

Tri-State's Comments on the TCI Draft Framework

November 8, 2019

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Tri-State Transportation Campaign (TSTC) is an advocacy organization dedicated to reducing dependency on traditional automobiles by improving the quality of public transit, decreasing greenhouse gas emissions caused by transportation, and advocating for safer, greener, equitable street design in New Jersey, New York, and Connecticut. TSTC advances its mission by developing unique technical, data, and policy analysis that allows us to build trusted relationships with legislators, inform advocates and coalition partners, and advance our message in the media.

Comments on Process

Equity

Considering the RGGI standards' effects on environmental justice communities, Tri-State appreciates the states' deliberations on decision-making. We urge the TCI coalition to continue its emphasis on this and we look forward to the draft MOU including concrete actions to back up the message from this draft framework.

Public Input

Tri-State encourages a transparent, accountable process and decision-making on TCI. We are encouraged by NY listening sessions and appreciated the state's outreach to advocates. We urge all states, especially New Jersey and Connecticut, to follow suit and exceed level of community involvement in decision-making.

Leadership

New York and New Jersey in particular are two of the most populous and progressive states in the region and must be part of this process. If they are not involved in decision-making, that discretion goes to more conservative leadership from smaller states. They're leaving revenue on the table by not committing or engaging publicly with this project.

Modeling

Georgetown has done modeling on greenhouse gas emissions reductions, but no potential financial modeling based on existing fuel pass through and usage. To show a compelling financial reason and the potential for investment in these communities, advocates and state governments need sound proof that this program is worth the time and energy required.

Comments on Investment

Transit

Transit capital funding for All-Electric Buses and electrifying rail is already overdue and a vital component to expand the transit systems in our region. Each state is at a different place with electric rail and we want to see that become the norm to have all rail in the region be electrified.

In New Jersey, New York State, and Connecticut the potential of many municipalities as destinations in and of themselves has been eclipsed by the attention given to improving the commute to and from New

York City (Newark and Jersey City are prime examples). This would encourage and refocus the transportation authorities on intra-state travel and not just in and out of Manhattan. Under this focus, station-to-station connections become vitally important.

Fleet Electrification

NJ Transit must commit to electrifying its bus fleet by 2040, joining 60 other transit agencies that are moving forward with deploying electric buses, including the MTA and CT Transit. In addition to this vision, NJ Transit needs 10 dedicated operating revenue to support the commitment. NJ Transit must also put forth an implementation plan for EV buses that prioritizes environmental justice communities and front-line communities that suffer disproportionately from the negative health effects of deadly emissions specifically high asthma rates, especially in children.

Priority Communities

New York State passed the Climate Leadership and Community Protection Act in 2019, requiring a 35 percent investment of all clean energy program resources in environmental justice communities, and advocates continue to push for 40 percent.¹ This type of investment commitment is key to ensuring the proceeds are utilized for improved transportation and air quality projects. Tri-State is focused on these commitments as the first step to real for residents of these communities and encourage states to publish similar metrics for TCI revenue.

Freight

The utilization of rail is the most environmentally sound way to move freight. Trains are four times more fuel efficient than trucks. They also reduce congestion, lower greenhouse gas emissions, and reduce pollution. Incentives and funding must be available to encourage freight railroads to develop and implement greener technologies and operating practices to support greater environmental benefits.

Complete and Green Streets

TCI states must also prioritize funding programs and the development of infrastructure that supports and encourages biking and walking. Complete Streets² policies are an effective way to ensure these projects are included in the local and state planning processes. Including micro-mobility options such as bike share, e-scooters, are another way to reduce single occupancy vehicle use, especially for the first mile/last mile problem.

Electric Vehicles and Infrastructure

Electric Vehicle infrastructure is currently funded in the most part with one-shot pots such as the Volkswagen settlement. Partnership for Plug-In is a good starting point but requires long-term funding. Conversion to this new way of powering vehicles means an overhaul not only of power but through land-use changes and trip planning. Electric Vehicles may be incentivized not only through state investment in charging infrastructure but through tax incentives or subsidies to improve adoption rates.

Revenue

While the states will be largely responsible for determining the use of revenues, TCI revenue must be allocated appropriately to address all sources of GHG emissions and other clean energy policy goals. All

¹ <https://www.dec.ny.gov/press/118458.html>

² https://www.state.nj.us/transportation/eng/completestreets/pdf/CS_Model_Policy_2019.pdf

revenues must have protection mechanisms to avoid misuse of funds and to preclude states from being able to flex dollars to fill other budget shortfalls.

Comments on Complementary Policies

Policies that recognize and focus on the reduction of vehicle miles traveled (VMT) will be most effective to reach the goals of TCI. This includes Complete & Green Streets Policies (see above) and vital planning documents such as Energy Master Plans and Transportation Master Plans which focus on the connection between land use and transportation as ways to eliminate the need for use of the single occupancy vehicle and reduce overall VMT. This should be the primary goal of TCI jurisdictions. Benchmarking mechanisms must be in place to hold jurisdictions accountable for implementation. This could include, but not be limited to: linear feet of sidewalk including pervious surface, number of bikeshare and scooter programs, miles of bike lanes and off-road trails, and shade trees planted, among others.

Climate Commitments

Many large transit authorities, including the MTA and CT Transit, have committed to electrification by 2040, but New Jersey has not.³ Additionally, all three states in our catchment area are members of the United States Climate Alliance.⁴ This is an excellent starting point, but does not commit to specific policies. To use TCI funds effectively, Tri-State calls on these states to use legislative and executive solutions to prioritize their climate goals.

Local Planning

To ease the transition away from single occupancy vehicle use and reduce vehicle miles traveled, local planning organizations and departments may implement green and complete streets policies to make their communities more walkable, safe, and healthy.⁵ Changes in land use to focus on transit-oriented development and higher density are also helpful to reduce vehicle miles traveled.⁶ Conversely, projects that encourage car use—especially road widening—should be resisted and avoided.

³ <http://www.tstc.org/resources/electrify-nj-transits-bus-fleet-now/>

⁴ <http://www.usclimatealliance.org/governors-1>

⁵ <https://smartgrowthamerica.org/resources/complete-and-green-streets/>

⁶ https://www.cdc.gov/healthyplaces/transportation/vmt_strategy.htm