**Virginia Sierra Club**

**Comments on Framework for a Draft Regional Low Carbon Transportation Policy Proposal**

A cap-and-invest program to reduce transportation carbon emissions provides a tremendous opportunity to expand clean transportation choices, improve access and outcomes for all residents, and make our communities more economically competitive with better access to bus and rail transit. The transportation sector accounts for more than 40% of carbon emissions in Virginia. Our current transportation system is heavily weighted toward automobile travel. This not only increases pollution, but also limits access to economic opportunity for those who cannot afford to own a vehicle. Our auto-oriented transportation system is also deeply inefficient and fiscally irresponsible, requiring massive outlays for new roads that quickly fill up, with relatively little economic return.

Virginia has made impressive strides in developing a performance-based system for evaluating transportation investments, and prioritizing maintenance and repair of existing assets. Virginia’s SMARTSCALE program is funding a broad array of transit, pedestrian, bicycle and other clean transportation projects that expand choices and reduce pollution. A cap-and-invest program is an opportunity to build on this progress. However, it will only be successful if Virginia develops a strong investment strategy with metrics for reducing VMTs and accelerating clean transportation technologies. Investments in expanded walking, bicycling, transit, and electric vehicle options will bend down the carbon emissions curve and help create more vibrant, economically competitive communities where people want to live and employers want to locate.

We strongly support the Framework's focus on "Expanding low-carbon and clean mobility options in urban, suburban, and rural communities, particularly for populations and communities that are currently underserved by the transportation system or disproportionately adversely affected by climate change and transportation pollution." In developing parameters for investment of proceeds, emphasis should be given to the following:

* improve transportation access for lower-income census tracts, such as through improved bus service, pedestrian connections to services, access to clean vehicle use;
* provide funds to improve resiliency and adaptation in communities most affected by recurring flooding and other climate-related impacts, such as communities located in floodplains;
* increase housing options through funding preservation and development of more affordable housing near transit areas.

In regard to Regulated Entities, we support the recommendation that state fuel suppliers would be the regulated entities under the proposed program and would be required to hold allowances to cover reported emissions.

In conclusion, we strongly support Virginia’s participation in a regional cap-and-invest program to reduce carbon emissions from transportation. Participating in regional program ensures that reductions are accomplished more effectively and efficiently, at the lowest possible cost. By providing new funding streams for clean transportation, including transit, bicycling and pedestrian facilities as well as electric vehicles, a cap-and-invest program will build on Virginia’s progress in creating a more efficient transportation system that provides residents with more choices in how they get around.