

November 12, 2020

To: Connecticut, Delaware, Maine, Maryland, Massachusetts, New Hampshire, New Jersey, New York, Pennsylvania, Rhode Island, Vermont and Virginia Governors and D.C. Mayor

Re: Need for an Ambitious and Equitable Transportation and Climate Initiative Program

Dear Governors and Mayor:

We, the 200 undersigned transportation, health, environment, business, labor, and community groups and regional and state coalitions, write to express our collective position on the proposed regional Transportation and Climate Initiative (TCI) program that Northeast and Mid-Atlantic states and D.C. have been developing since 2017, and for which a Memorandum of Understanding (MOU) committing to the program is expected later this year.

We support an ambitious and equitable TCI program that includes strong safeguards and guarantees for overburdened and underserved communities as an important part of our shared efforts to combat the climate crisis, protect public health, and address inequities in the transportation sector. We urge TCI jurisdictions to move forward with such a program, consistent with the principles and criteria we outline below, while continuing to work with communities to develop and advance other critical programs that are also needed.

Together, we recognize the following:

- The United States and the world face a climate crisis fueled by the extraction and use of fossil fuels. In the Northeast and Mid-Atlantic region and across the U.S., the transportation sector is the number one culprit as gasoline and diesel-fueled vehicles spew toxic air and emit dangerous, climate-altering carbon pollution. We cannot avoid the worst impacts of climate change unless we adopt and implement policies to substantially reduce transportation pollution. If we do not act quickly and comprehensively, climate change will dramatically destabilize American society.
- Our current transportation system is deeply inequitable. As recent research from Harvard and other leading universities shows, Black and Brown communities face disproportionate exposure to and health harms from transportation vehicle pollution.¹ Low-income families and individuals across urban, rural, and suburban areas struggle to obtain safe and affordable transportation to get to work, school, medical appointments, recreation, and other needs. Many of these same overburdened and underserved communities are on the front lines of, and most vulnerable to, the impacts of climate change. As recent extreme weather events across the country vividly demonstrate,

¹ Transportation, Equity, Climate and Health (TRECH) Project Research Update: Preliminary Results (October 6, 2020), <https://cdn1.sph.harvard.edu/wp-content/uploads/sites/2343/2020/10/TRECHResearchUpdate10.20.pdf>.

vulnerable populations are always impacted first and hardest, and are the slowest to recover.

- Addressing these overlapping crises will require transitioning to a clean and equitable transportation system, along with transformational new investments in our infrastructure and communities that reduce the overall amount of motor vehicle travel. The COVID-19 pandemic has further heightened and exposed these needs as public transit systems in the region face staggering budget deficits and as the most pollution-overburdened communities have experienced the greatest health harms.

A TCI cap-and-invest program alone will not solve these problems, and it cannot and must not be our only response. A well-designed TCI program, however, with strong safeguards and guarantees will move us forward by investing billions of job-creating dollars in clean and equitable transportation. Those investments combined with a legally binding limit on transportation carbon pollution will *hold the oil industry accountable*. Such a program will help us tackle critical issues in our region's mobility and build a better, more just transportation system that makes communities safer and healthier, helps rebuild our economy from the COVID-19 pandemic, and creates thousands of good, family-sustaining green jobs.

We call on you to lead this transformation by adopting a TCI program that achieves these outcomes by including the following:

- **A strong carbon pollution cap, requiring at a minimum a 25 percent reduction in transportation carbon pollution over the next decade.**
 - We have no time to waste in cutting climate pollution, and analyses by the states and independent experts show that more ambitious caps would provide greater economic, job creation, health, and environmental benefits.
 - The TCI program must be as ambitious as possible, requiring at least the 25 percent pollution reduction states have modeled. We urge states to adopt an even more ambitious reduction to achieve greater benefits.
- **An ironclad guarantee to prioritize and dedicate significant program spending to address the needs of overburdened and underserved communities.**
 - The 35 percent funding commitment proposed by states for overburdened and underserved communities is an absolute minimum, and individual states should commit to investing significantly more in these communities. As states establish definitions for overburdened and underserved communities they should further revisit these funding commitments to assess whether they are adequate.
 - To address long-standing inequities, it is essential that, in addition to the minimum regional investment standard, states commit to ensuring that overburdened and underserved communities receive a significantly greater share of program benefits and spending than these communities' share of the population. The program's impacts in each jurisdiction must be progressive and not regressive.

- States must adopt strong safeguards to ensure the investments of funds in overburdened and underserved communities cannot be redirected or reduced. States must similarly adopt safeguards to ensure the vast majority of other program funds are invested in clean and equitable transportation solutions that advance the goals of the TCI program.
- **Equity Advisory Bodies that are representative of each state’s overburdened and underserved communities and have clear decision-making roles.**
 - Overburdened and underserved communities across urban, rural, and suburban areas must be engaged and have their transportation needs and priorities addressed under the TCI program. This includes both states’ commitment to establish diverse and representative Equity Advisory Bodies and the need for broad and accessible stakeholder processes and engagement in establishing program priorities and conducting implementation. The *majority* of Equity Advisory Body members should be representatives from overburdened and underserved communities or populations. TCI states should also provide funding to support the capacity of community-based organizations that are located in or work most closely with overburdened and underserved communities to lead community outreach and education.
 - Equity Advisory Bodies must have a clear and influential role in identifying “overburdened and underserved” communities in each state, developing metrics for equity assessments that states will be required to report, and defining criteria to evaluate funding proposals and potential projects and the degree to which they would provide direct benefit to communities. Communities themselves must have agency in deciding how best to prioritize and spend these resources.
 - We recognize and affirm the concerns of environmental justice and community organizations that TCI discussions and stakeholder processes to date have not lived up to communities’ demands for justice and equity. We call on states to correct these deficiencies and meaningfully engage with overburdened and underserved communities in the continuing development of the TCI program post-MOU and during implementation. Doing so will help ensure that these communities are not further unduly harmed.
- **Commitments to achieve emissions reductions in overburdened communities and full transparency and reporting on program spending and emissions and equity outcomes.**
 - Implementation of the TCI program must be transparent and include metrics to measure its impacts, including progress toward achieving equity goals. Investments and program outcomes should be reported at least annually, both regionally and in each participating jurisdiction, with opportunities for stakeholders to review and provide recommendations for improvements to the planning process, allocation of investments, and program metrics.
 - TCI jurisdictions must commit to, measure, and ensure that the TCI program will not create or exacerbate pollution hotspots in any environmental justice community and prioritize program investments to reduce pollution burdens in

these communities. Therefore, it is not enough for the TCI program to include a strong cap, dedicated investments, and Equity Advisory Bodies. **States must also commit to adopting complementary measures that will lead to localized pollution reductions in disproportionately affected communities as part of and in addition to the TCI program.** To ensure the TCI program achieves these outcomes, it is critical that, as soon as possible, states deploy air quality monitoring in every EJ community and provide publicly accessible data to establish baselines and measure results.

- If monitoring and reporting show local co-pollutant emissions reductions and other benefits are not being achieved, TCI states must commit to course correction(s), including adjusting investment allocations as needed, and a regular process of program review with robust community engagement to identify and implement improvements that guarantee emission reductions.
- **Commitment to strong labor and workforce development standards and a just transition.**
 - Through investment, procurement, and infrastructure projects, the TCI program must promote high-road, domestic jobs with fair, livable pay, good benefits including health care and paid sick leave, and union neutrality.
 - The program should also support workforce development and job training, especially for workers affected by the transition to cleaner vehicles. Communities that are most in need of good employment opportunities, including those living in low-income areas, veterans, people with disabilities, and formerly incarcerated individuals, should have targeted recruitment, inclusive hiring, and entry-level job training programs linked to positions in careers that provide opportunity for advancement.
 - Additionally, the program should include supplier diversity goals to prioritize proposals from businesses owned by women, minorities, and veterans.

A TCI program that meets these criteria would be a significant step forward, but alone it will not be enough to achieve an equitable and sustainable transportation system. It is essential that states also adopt other complementary transportation, land-use, economic, and environmental policies in addition to TCI that further address and center transportation equity and justice, particularly policies for which environmental justice communities have spent decades advocating.

The recent Harvard study of TCI's health impacts underscores this need, revealing that while a TCI cap-and-invest program will reduce pollution inequities, it will not fully solve them. Pollution burdens that disproportionately harm Black and Brown residents are projected to continue unless states also take other actions to cut pollution. We urge states to work directly with overburdened and underserved communities to identify, adopt, monitor, and implement other measures that communities need. These actions should go beyond what is already required by law, be co-developed and co-led with impacted communities, and not replace current programs and policies that these communities feel are working.

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In the coming weeks, we urge you to adopt an ambitious and equitable TCI program MOU consistent with the principles outlined above. Beyond the MOU, we also urge states in the coming months to work with stakeholders and provide meaningful opportunities for community input and review—both regionally and within each state—as states develop a detailed Model Rule and state-specific implementation plans for the TCI program. Building on the MOU, the TCI program Model Rule and implementation plans must provide safeguards and guarantees necessary to achieve states’ commitments and the TCI program’s potential for reducing inequities in overburdened and underserved communities.

Together with other complementary measures, a TCI program consistent with these principles would help us build the better and more just transportation system and economy that our region wants and deserves. Now is the time for leadership. We urge you to incorporate these principles into the MOU and to add your signature with other Governors showing leadership on this critical public health and climate program.

Sincerely,

350 DC
350 Maine
350 Mass for a Better Future
350 New Hampshire
350 Rhode Island
A Better City
A Climate to Thrive
Acadia Center
Active Prince William
Adirondack North Country Association
Advanced Energy Economy
Alliance for Business Leadership
Alliance for Clean Energy New York
AlphaStruxure
Amalgamated Transit Union Local 1336
American Lung Association
Appalachian Mountain Club
Ashford Clean Energy Task Force
Aztech Geothermal
Bedford 2030
Beverly Human Rights Committee
Beyond Extreme Energy
Bike Walk CT
CALSTART

Capital Region EV Drivers
CASA (Maryland, Pennsylvania, and Virginia)
Center for an Ecology-Based Economy
Center For Climate Change Communication,
George Mason University
Center for Climate Communities (C3)
Center for Sustainable Communities
Center for Sustainable Energy
Central Maryland Transportation Alliance
Ceres
Chesapeake Climate Action Network
Chispa Maryland
Citizens Campaign for the Environment
Citizens for Local Power
Citizens for Regional Transit
Citizens’ Climate Lobby, Prince William
County VA Chapter
Citizens' Climate Lobby, Rhode Island
Chapter
Clean Air Council
Clean Energy Advisory Committee of
Beverly
Climate Action Now, Western
Massachusetts

Climate Change Awareness & Action
Climate Group
Climate Law & Policy Project
Climate Reality New York Chapters Coalition
Climate Smart Kingston Commission
Climate Solutions Accelerator of the
Genesee-Finger Lakes Region
Climate XChange
Coastal Enterprises, Inc
ColorBrightonGreen.org
Concerned Health Professionals of NY
Connecticut ATU Legislative Council
Connecticut Commuter Rail Council
Connecticut League of Conservation Voters
Connecticut Roundtable on Climate and
Jobs
ConnPIRG
Dandelion
Delaware Electric Vehicle Association
Drive Electric Long Island
Drive Electric RVA
E2 (Environmental Entrepreneurs)
EarthKind Energy
East Coast Greenway Alliance
Elected Officials to Protect America
Electric Auto Association
Electric Vehicle Association of Greater
Washington, DC (EVADC)
Emerald Alternative Energy Solutions, Inc.
Environment America
Environment Connecticut
Environment Maine
Environment Maryland
Environment Massachusetts
Environment New Hampshire
Environment New Jersey
Environment New York
Environment Rhode Island
Environment Virginia
Environmental Health Strategy Center
Environmental League of Massachusetts
EV Club of Connecticut
Evangelical Environmental Network
Faith Alliance for Climate Solutions

Farmingdale State College
FLxDER Inc.
Frack Action
Friends of Casco Bay
Gateway Cities Innovation Institute at
MassINC
Generation180
Get Your GreenBack Tompkins
Gobike Buffalo
Greater Prince William Climate Action
Network
Green Energy Consumers Alliance
Green For All
GreenFaith
Groundwork Rhode Island
Grow Smart RI
Harford County Climate Action
Health Care Without Harm
Hudson River Sloop Clearwater, Inc.
Institute for Transportation & Development
Policy
Isles
League of Women Voters of Delaware
League of Women Voters of Massachusetts
League of Women Voters of New York State
League of Women Voters of Pennsylvania
League of Women Voters of Vermont
Longwood Energy Group
Maine Audubon
Maine Conservation Voters
Maine Youth for Climate Justice
Maryland Conservation Council
Maryland League of Conservation Voters
Maryland Legislative Coalition
Maryland PIRG
Massachusetts Interfaith Power and Light
MassBike
MassPIRG
Metropolitan Area Planning Council
Mothers Out Front Massachusetts
Mothers Out Front Virginia
National Fisheries Conservation Center
Natural Resources Council of Maine
Natural Resources Defense Council

NECEC
Network for a Sustainable Tomorrow (NEST)
New Haven Climate Movement
New Jersey Future
New Jersey League of Conservation Voters
New Jersey Sustainable Business Council
New Paltz Climate Action Coalition
New York League of Conservation Voters
New York Solar Energy Society
New York Sustainable Business Council
New Yorkers for Clean Power
NHPIRG
NJPIRG
Nobody Leaves Mid-Hudson
NY for TCI
Old Colony Planning Council
PennEnvironment
PennPIRG
Philadelphia Solar Energy Association
Philly Transit Riders Union
Physicians for Social Responsibility New York
Physicians for Social Responsibility Pennsylvania
Pittsburgh Community Reinvestment Group
Pittsburghers for Public Transit
Plug in America
POWER: An Interfaith Movement
Rail Passengers Association
Rails-to-Trails Conservancy
Regional Plan Association
Renewable Energy & Sustainability Center at Farmingdale State College
Renewable Energy Long Island
RESTORE: The North Woods
Rhode Island Center for Justice
Rhode Island Committee on Occupational Safety and Health
RI Transit Riders
Riders Alliance
RIPIRG
RUPCO
Save the Sound
Schneider Electric

Solar United Neighbors of DC
Solar United Neighbors of Maryland
Solar United Neighbors of Pennsylvania
Southern Environmental Law Center
Southern Maine Conservation Collaborative
SunCommon
Sustainable Hudson Valley
Sustainable Westchester
Transit Choices
TransitCenter
Transport Hartford Academy at the Center for Latino Progress
Transportation for America
Transportation for Massachusetts
Transportation for Vermonters
Tri-State Transportation Campaign
U.S. Green Building Council - Long Island Chapter
U.S. Green Building Council Rhode Island
U.S. PIRG
Union of Concerned Scientists
Unitarian Universalist Congregation of the Catskills
Unitarian Universalist Legislative Ministry of Maryland
VEIC
Vermont Businesses for Social Responsibility
Vermont Climate and Health Alliance
Vermont Conservation Voters
Vermont Interfaith Power and Light
Vermont Natural Resources Council
Vermont PIRG
Virginia Clinicians for Climate Action
Virginia Conservation Network
Virginia Organizing
Walk Boston
Washington Area Bicyclist Association
Working for Justice Ministry, St. Paul's United Methodist Church
YSG Solar



