Memorandum

To:	Transportation and Climate Initiative Leadership Team
From:	Signatory Agencies
On:	February 28, 2020
Re:	Comments Regarding the Transportation and Climate Initiative Draft Memorandum of Understanding

The undersigned regional planning organizations believe the overall mission of TCI to improve transportation, develop the clean energy economy and reduce carbon emissions from the transportation sector is timely and critical to effectively address the challenge of climate change. We appreciate the opportunity to comment on the TCI's draft Memorandum of Understanding for a regional low-carbon transportation program to reduce climate-changing emissions and invest in cleaner transportation, healthier communities, and more resilient infrastructure. We believe proposed the cap-and-invest program could be a key component of a comprehensive strategy to address the social, economic, and environmental impacts of climate change on our cities and towns.

Over the past several months, regional planning agencies[1] from throughout the TCI states and the District of Columbia have convened to discuss the importance of an equitable and robust TCI policy framework, and we are pleased to see the policy development process move forward in a timely and inclusive manner. Most recently, our organizations came together in Washington, D.C. in January 2020 to discuss the recently released draft Memorandum of Understanding (MOU). We commend the TCI leadership team for reaching this important milestone and look forward to working with you to advance the initiative.

Regional planning entities are uniquely poised to play a valuable role in educating our constituencies about the need and beneficial impacts of a cap and invest program. One of our core functions is to convene local and regional stakeholders on critical land use, transportation, and climate issues facing our communities today and in the future. We often provide direct technical assistance to cities and towns to address these challenges, and in many cases, this work happens in collaboration with our state partners. Several COGs are also designated as MPOs to program federal transportation dollars. As a result of all these functions, we have deep knowledge and expertise around regional and state transportation and climate needs.

As the TCI jurisdictions work toward developing a final MOU, we encourage the leadership team to consider the following elements that our organizations see as crucial to the successful implementation of a cap-and-invest program:

Program Design

TCI investments should lead to significant, measurable reductions in transportation emissions as well as improve transportation options in Environmental Justice (EJ), low-income, and/or rural communities.

To maximize the impact of the funds generated from a cap-and-invest strategy and to build support for the program, revenue should be allocated toward investments that will yield <u>significant</u> and <u>measurable</u>

[1] These agencies include Councils of Governments (COGs), Metropolitan Planning Organizations (MPOs), Regional Planning Commissions (RPCs), and Regional Planning Agencies (RPAs), with the precise names often varying across states.

reductions in transportation emissions. TCI jurisdictions should adopt a common set of performance standards for evaluating investment decisions over the short and long term, with specific and agreed-upon procedures to integrate what is learned into future investment decisions. The jurisdictions, along with their partners at the regional and local level, should also work toward the shared goal of increasing the low-carbon travel mode share in the region.

At the same time, we must acknowledge that residents in EJ, low-income, and/or rural communities have often faced chronic disinvestment in safe and affordable transportation infrastructure, and in many cases a disproportionate impact of the pollution associated with transportation. TCI offers an opportunity to redress these legitimate grievances by targeting significant investments to improve transportation options in these communities – investments that should be accompanied by the adoption of complementary policies designed to improve public health outcomes and to promote economic opportunity.

Regional planning entities should be active partners throughout the development and implementation of TCI.
Technical analysis and related work activities associated with assessment of travel demand and on-road motor vehicle emissions to inform the emissions caps and investment opportunities should be coordinated and aligned with the existing federally-mandated modeling and planning work of regional agencies. This is crucial to ensure consistency with regional transportation planning and also to leverage and complement federal and state dollars MPOs currently program in their Long Range Transportation Plan (LRTP), Transportation Improvement Program (TIP), and Unified Planning Work Program (UPWP). In addition to these technical capabilities, one primary function of regional planning entities is to convene our municipal and regional stakeholders who will have a role in implementing the investments. We strongly encourage TCI jurisdictions to look to our regional entities as facilitators for conversations around TCI, especially when looking to advance this initiative among local elected officials, during both program design and implementation.

The final program design should be flexible enough to allow for new states to join over time.
As has been the case with the Regional Greenhouse Gas Initiative, TCI should allow for new states to join after the initial cohort of jurisdictions sign on to the final MOU. This will allow the program to capture a larger share of emissions from transportation and it will keep open the possibility of linking with other cap-and-invest programs elsewhere in the country. To accommodate the addition of new jurisdictions, the program design should retain enough flexibility to allow for the emissions cap and rate of reduction to adjust over time.

Investments

While investments should focus on reducing transportation emissions, each participating jurisdiction should be able to decide on the investment portfolio that best suits local needs.
Our organizations are deeply concerned about the equitable investment of TCI revenue, including balancing different needs in urban, suburban, and rural areas. TCI jurisdictions should have the flexibility to invest program revenue in solutions that will help achieve emission goals in communities with varying density and transit access. In addition to using TCI revenue to improve and expand public transit options, the jurisdictions should also consider allowing for investments in transit-oriented affordable and mixed-income housing and other measures that would help to reduce emissions. Such land-use solutions will help to reduce our dependence on automobiles, make it easier for more people to take transit, encourage walking and biking, and shorten the duration of many auto trips. Such changes must be an important piece of a broader strategy to reduce transportation emissions. We encourage having a variety of investment options be on the table when considering how this program can most effectively make transformative changes to our transportation system across the TCI region.

TCI revenue must be generated and invested transparently.

Information about the amount of revenue generated, the investments made, and the anticipated emissions reductions should be publicly available online and in physical locations. Any performance measures or emissions targets developed as part of this program should also be made available, along with regular reports highlighting progress toward emission reduction goals. While the draft framework references a commitment to meaningful community engagement, the TCI jurisdictions should specifically continue community listening sessions throughout program implementation to gather additional feedback for ongoing investments.

TCI jurisdictions should ensure the possibility for multi-state investments.
Some regional planning entities serve communities located in two or more TCI jurisdictions, and they know well the challenges associated with inter-state or state-district collaboration. While the draft framework reasonably notes that each jurisdiction will make its own decisions about how proceeds are to be invested, there should be the opportunity to make investments across multiple participating jurisdictions. Multiple jurisdictions that wish to come together to invest in, say, electric charging stations for I-95 or Amtrak improvements, they should be clearly allowed to do so, and any regulatory questions regarding how TCI funds may be disbursed across multiple jurisdictions should be answered once the dollars become available.

Thank you for your consideration of these principles, and we look forward to working with you on this important initiative.

Sincerely,

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