

April 30, 2019

Transportation and Climate Initiative
c/o Georgetown Climate Center
Hall of States, Suite 422
444 N. Capitol Street
Washington DC 20001

RE: Transportation and Climate Initiative

To the Transportation and Climate Initiative Community:

We are environmental justice (EJ) organizations in the northeast whose constituencies will be affected by the Transportation and Climate Initiative (TCI) and for that reason wanted to weigh in on the conversation that has emerged about TCI, EJ and equity. We especially want to support and elaborate on concerns about the TCI process raised by our friends, colleagues and allies in the Climate Justice Alliance, in their recent Climate Justice Equity Principles for the Transportation and Climate Initiative letter.

We are disturbed by a process that seems to have, either purposely or otherwise, relegated EJ groups to a relatively marginal status in the TCI regional policy development process. EJ groups were not invited to a TCI advocacy table that seems to have existed for years. It is our understanding that the table included large Green Groups and while it is not clear to us how influential the table was on the official TCI process it is clear we were not a part of it. We fear that we were left out because it was strongly suspected EJ groups would not support a cap and trade system, or some variation of the same, as the basic framework to be used to address transportation emissions and climate change.

It further appears to us that TCI favored some type of cap and trade system early in its organizational existence (*Reducing Greenhouse Gas Emissions from Transportation: Opportunities in the Northeast and Mid-Atlantic*, 2015). Instead of being part of any early consultation that might have occurred between the advocacy table and the official TCI process, EJ groups only testified at public listening sessions that ultimately were used to support the selection of a cap and invest system as the Initiative's emissions reductions operational framework. Whether the selection of a cap and invest system was pre-ordained or EJ groups were just outnumbered, this process had the effect of marginalizing EJ groups that represent Of Color and low-income communities, which frequently suffer disproportionate amounts of pollution. This is a troubling and unacceptable approach to addressing transportation and climate issues.

Furthermore, it seems that another organization, without an EJ focus and based in another part of the country, somehow became a proxy for local EJ organizations in the region and attempted to act as a "funnel" for EJ concerns. This is not an appropriate means by which to address EJ concerns relevant to the Transportation and Climate Initiative. Local EJ organizations in the

northeast should speak for themselves and should be a priority for inclusion in the discussion of a substantive framework and substantive policies to address transportation emissions.

The TCI sessions on April 30th and May 15th bifurcates the discussion of technical mechanisms for delivering a cap and invest system and equity considerations and is symptomatic of the problem of superficial attention to meaningful participation and equity.

The substantive development of transportation-related climate change mitigation policy should go hand in hand with the discussion of potential equity implications of such a program design. Issues such as the regressive nature of fuel cost impacts, the interaction with existing state and local transportation equity policies, and other related issues cannot be discussed absent a full vetting of the assumptions and mechanisms being proposed for the implementation of a regionwide policy. EJ organizations that work with frontline and impacted communities should be prioritized for deliberations on the substantive issues of policy development and not just be an often-conflicted participant in a discussion of potential revenue allocation from such a model. Furthermore, we believe that there are viable alternatives to a cap and invest system that can reduce mobile source emissions that are not only contributing to climate change but are also harming the health of overburdened EJ communities. In fact, many of our organizations are actively engaged and leading efforts in our respective states to reduce transportation related emissions.

Before engaging in the TCI process in a substantive manner, our groups would like to meet with TCI officials and discuss how we can ensure that a process will be implemented which seriously considers recommendations we put forth, even if they conflict with prevailing ideas held by the Initiative. We look forward to such discussions.

Sincerely,

New Jersey Environmental Justice Alliance
Ironbound Community Corporation