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February 28, 2020

Dear Transportation and Climate Initiative members,

On behalf of Mass Audubon, I submit the following comments in strong support of the Draft Memorandum of Understanding (MOU) of the Transportation and Climate Initiative (TCI).

Mass Audubon protects more than 38,000 acres of land throughout Massachusetts and is our state's largest nature conservation nonprofit. Through our work to preserve the natural heritage of our beautiful state for today's and future generations, climate change has become inextricably linked to everything we do, from conservation to education to advocacy.

We know our climate is already changing—and with it, our natural lands, waters, and wildlife. The last decade alone has included eight of the 10 warmest years since measurements began, and extreme weather events have contributed to economic loss, not to mention a devastating loss of human and ecological life.

Despite these challenges, we have the capacity to avoid the worst future impacts if we take urgent action. TCI offers one crucial strategy: addressing the transportation sector, which currently is responsible for 40% of all greenhouse gas emissions. Without addressing this sector, it will be impossible to reach our emissions reduction goals.

Transportation pollutants are also a major contributor to our ongoing public health crises, as the soot and smog from cars and trucks are known to cause lung disease and other health problems across the region, especially in already-vulnerable urban areas.

By utilizing a similar cap-and-invest approach as the already successful Regional Greenhouse Gas Initiative used in the power sector, TCI offers solutions for both emissions reduction and investment in sustainable transportation infrastructure. These investments could include modernizing the MBTA, increasing the number of electric vehicles and charging stations, improving sidewalks and bike lanes, and providing transportation funding to rural and lower-income communities.

We encourage individual state spending of these funds to be made equitably and distributed statewide – priorities for which Mass Audubon plans to advocate at the legislative level here in Massachusetts.

TCI would also provide significant, additional returns on these investments, given the estimate that the program could yield annual public health benefits across the Northeast of \$3-\$10 billion, and \$250-\$892 million in avoided costs due to worsening storms and other climate impacts.

Mass Audubon strongly supports the regional approach taken by TCI, and we urge an emphasis on states adopting the emissions cap that cuts the most pollution most quickly. As federal environmental rollbacks continue at an alarming rate, it is increasingly up to states to push overdue climate action policies forward.

Thank you for considering these comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "John J. Clarke".

John J. Clarke  
Director