

DRAFT COMMENTS FROM THE ACRPC TAC ON THE [TCI DRAFT MOU](#)

TO BE SUBMITTED TO <https://www.transportationandclimate.org/main-menu/tci-regional-policy-design-stakeholder-input-form>

DUE DATE: FEBRUARY 28, 2020

The following comments are on behalf of the Addison County Vermont Regional Planning Commission's Transportation Advisory Committee to offer public input on the draft Transportation Climate Initiative (TCI) Memorandum of Understanding (MOU) for a regional program to establish a cap on global warming pollution from transportation fuels. We support the goal of limiting greenhouse gas emissions from the transportation sector, and offer the following comments to improve the draft MOU.

In apportioning the regional cap to TCI jurisdictions, the final MOU must take into account existing efforts to curb transportation related greenhouse gas emissions. For example, jurisdictions that already invest heavily in mass transit should not be penalized for prior investments that have reduced emissions.

Section 3 of the MOU discussing Investments and Equity lacks detail. The costs of the program are fairly clear, but the benefits, which should be spelled out in this section, are still vague. It will be extremely important in building political support for the MOU that constituents have a better idea of how the revenue raised will make an impact in their lives.

To that point, it is very important to our constituents that efforts be made to mitigate the impacts of the TCI on low-income populations in rural areas. In rural areas like Addison County, our poorest community members often live far from populations centers. In purchasing vehicles, they rely upon second-hand cars and trucks, and the availability of fuel-efficient vehicles at a low price point in that market is constrained. Some of the revenue raised by the TCI should go to assist this population in transitioning to low emission vehicles and to offset the economic hardship they will face when the cost of fuel increases.

The draft MOU lacks detail on how a Participating Jurisdiction would leave the TCI (Section 5B) and what would happen to allowances auctioned on their behalf. Would those allowances still be honored as in Section 2J – “Participating Jurisdictions shall accept allowances sold or originated in other Participating Jurisdictions”?

We thank you for the opportunity to comment on the draft MOU.