



Save the Sound[®]

Action for our region's environment.

**Testimony of Save the Sound
Before the Environment Committee**

In Support of [S.B. No. 884](#) AN ACT REDUCING TRANSPORTATION-RELATED CARBON EMISSIONS.

In Support, with amendments, of [H.B. No. 6551](#) AN ACT CONCERNING ENVIRONMENTAL AIR QUALITY.

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Save the Sound is a nonprofit organization representing over 4,200 member households and 10,000 activists statewide. Our mission is to protect and improve the land, air, and water of Connecticut and the entire Long Island Sound region. We use legal and scientific expertise and bring citizens together to achieve results that benefit our environment for current and future generations.

Dear Co-Chairs Cohen and Gresko, Ranking Members Miner and Harding, and members of the Environment Committee:

I. Save the Sound supports [S.B. No. 884](#) AN ACT REDUCING TRANSPORTATION-RELATED CARBON EMISSIONS.

We all know the crisis that we are facing with respect to climate change and the very real impacts that it poses for Connecticut, from more extreme heat days and the respiratory toll that takes on our most vulnerable citizens, to more frequent and more severe storms, to rising sea level rise and increased flood events.

While we appear to be on track to achieve our 2020 greenhouse gas reduction targets, moving forward we face the challenge of needing to decrease our emissions at a much quicker and steeper pace to meet our medium and long-term mitigation targets. And we can't be successful unless we focus on transportation.

In Connecticut (and generally throughout the region), transportation is the largest source of our emissions profile, accounting for approximately 38% of our climate emissions. Of that, gasoline and on-road diesel account for about 92%. Additionally, light duty vehicles, and medium and heavy duty trucks account for approximately 66% of the NOx that contributes to our ground level ozone (or smog), a particular problem for Connecticut.

TCI is designed to specifically address these emissions. This has been a long time coming and has sprung from the efforts of a large group of states throughout the Northeast and Mid-Atlantic region working, over the past decade or so, on how best to reduce greenhouse gas emissions and other pollution from the transportation sector. Beginning around 2018, they started focusing in on the development of a program modeled on the successful cap and invest program that was previously adopted for the electricity sector, RGGI (the Regional Greenhouse Gas Initiative).

Building upon the framework of the already successful RGGI model, TCI is a critical component of ensuring that we can achieve our Greenhouse Gas reduction targets under our Global Warming solutions Act. As with most greenhouse reduction programs, TCI will not only mitigate climate change but it will also directly improve our air quality throughout

the state and especially in our most overburdened communities. I'm sure we'd all agree that CT is a great place to live, but we have some of the worst air quality in the nation with respect to particulate matter, ozone and other pollutants.

Like RGGI, TCI has two primary components that drive down emissions. First, it establishes a declining cap on the allowable carbon emissions from on-road transportation fuels imported into the participating jurisdictions. Under the current program design, the emissions budget will decline 26% - 30% by 2032.

Secondly, because the source of those emissions will need to hold auctioned allowances for the carbon content of the emitting fuels, the program will generate revenue that will be devoted to investments in additional, complementary clean transportation polices, accelerating and reducing the cost of emission reductions.

While the TCI program is designed and operated regionally, each state has full control over how the auction revenues derived from their individual state carbon allowances are used. It's up to the state and in-state stakeholders how to prioritize those investments.

The range of clean transportation investments that might be considered is broad, and runs the gamut of clean transportation policies:

- Expanding electric vehicle charging infrastructure
- Expanding and improving public transit options
- Accelerating the transition to clean electric vehicles and buses
- Supporting a more robust complete streets strategy
- Other policies and programs that can address the negative impacts of transportation emissions and improve the state's transportation system

There are also clear economic benefits, in addition to the obvious health and environmental benefits. For the four preliminary participating jurisdictions, the program has been estimated to provide an average annual increase in GDP of \$97 million, an increase in Disposable Personal Income of \$75 million, and an increase in employment of over 400 job-years.¹ So all of the metrics are positive.

As we consider these investments, it's important to note that a focus on equity is built into the program. The TCI Memorandum of Understanding (MOU) calls for a *minimum* of 35% of the auction revenue to be directed specifically for the benefit of overburdened and underserved communities. Additionally, the MOU calls for the establishment of an Equity Advisory Body, comprised of stakeholders with a majority of members being representatives of overburdened and/or underserved communities. The Equity Advisory Board will provide recommendations for equitable investment priorities and develop metrics for evaluating how those investments provide direct and meaningful equity benefits. And there will be annual reporting on how well the program is meeting these objectives.

TCI is designed to ensure successful climate mitigation while maximizing public health benefits and increasing transportation accessibility, with a clear focus on equity. **Save the Sound urges the Environment Committee to support SB 884 and Favorably Report the bill out of Committee.**

II. **Save the Sound supports, with recommended amendments, H.B. No. 6551 AN ACT CONCERNING ENVIRONMENTAL AIR QUALITY.**

While we support the elements of the bill as far as they go, additional language should be added to:

- (1) Establish clear accountability for state agency decision-making that supports the states' greenhouse gas reduction obligations under the Global Warming Solutions Act (GWSA) and
- (2) Provide for citizen enforcement of the GWSA pursuant to the Connecticut Environmental Protection Act.

As we strengthen the foundational elements of the laws designed to protect our most vulnerable citizens from pollution, it is critical to ensure that the state's progress towards meeting its greenhouse gas reduction and environmental health goals is not hindered or undone by the individual decisions made by various state agencies.

¹ Estimating the Regional Environmental, Health, and Economic Benefits and Costs of the Transportation and Climate Initiative Program, at 7. https://www.transportationandclimate.org/sites/default/files/TCI-P_modeling-summary_12-21-2020.pdf.

Despite the clear climate, environmental health and clean energy goals that we have adopted as law, we continue to permit new, sources of localized polluting emissions in our communities – adding to the burden of already poor air quality. Rather than moving us closer to our goals, such actions merely add to the urgency and difficulty of the choices we will face in the future.

We must ensure that all arms of the government are supporting our climate and environmental goals to achieve a healthy and prosperous future for all. And when government agencies fail to do so, citizens should be able to hold them accountable.

As noted in the Final Report of the Mitigation Strategies Working Group of the Governor’s Council on Climate Change:

While Connecticut appears to be on track to meet its 2020 GHG reduction target, much steeper emission reductions will be needed to keep us on track to reach our 2030 and 2050 targets. To ensure that we continue to make the necessary progress, the state must have a disciplined and consistent approach to prioritizing mitigation policies and evaluating the climate impact of proposed actions. . . .

National and subnational actors are adopting increasingly comprehensive approaches to ensure that they remain on track to fulfill their GHG emissions-reduction obligations. While adoption of comprehensive GHG reduction and reporting requirements is critical to addressing needed emissions reductions, governments are recognizing that comprehensive compliance frameworks also are essential to ensure that discrete actions by agencies do not inadvertently cause states to diverge from the path toward to their formal reduction targets.²

New York,³ Vermont,⁴ Massachusetts,⁵ and Rhode Island⁶ have all recently taken steps to strengthen their climate legislation in a manner that enhances accountability and increases the likelihood of successfully achieving the goals that science tells us are essential. The Connecticut Mitigation Strategies Working Group recommended statutory requirements substantially similar to those proposed in this testimony.⁷

We urge the Committee to support HB 6551 and to report it out of Committee with the suggested additions.

Conclusion

Both of these bills will result in substantial environmental and health benefits for the citizens of Connecticut. We urge you to approve them consistent with the above testimony.

Thank you for your time and consideration of this testimony.

Respectfully submitted,

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² Final Report, Progress on Mitigation Strategies Working Group, Governor’s Council on Climate Change, at 14 (November 2020).

³ New York’s Climate Leadership and Community Protection Act requires all state agencies to assess whether their actions are consistent with the state’s goals of reducing greenhouse gases.

⁴ The Vermont Global Warming Solutions Act of 2021 establishes a cause of action for the failure to comply with the procedural or substantive provisions of the Act.

⁵ Massachusetts’ Act Creating a Next Generation Roadmap for Massachusetts Climate Policy establishes enhanced GHG reduction targets and environmental justice protections for vulnerable, communities.

⁶ Rhode Island’s 2021 Act on Climate legislation updates the state’s climate reduction targets and provides citizens with standing to enforce Rhode Island’s climate law by means of an action in the superior court.

⁷ Final Report, Progress on Mitigation Strategies Working Group, Governor’s Council on Climate Change, at 15 (November 2020).