

Letter Regarding Transit and Climate Actions in 2022 Climate Bill

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Subject: Take Action to Advance Transit Justice and Meet State Climate Obligations in 2022

Dear Chair Roy, Chair Barrett, Representative Chan, Senator Creem, Representative Jones, and Senator Tarr:

We write as the Massachusetts Transportation, Climate, and Equity Table on behalf of 20 organizations that include community-led, transportation, environmental, public health, labor, business, youth, and research organizations who have come together to engage in dialogue about transportation and climate policy. We acknowledge that tackling the climate crisis and addressing the inequities of our transportation system are not easy tasks and appreciate your leadership on these complex issues. The signatories and Legislature share the goals of creating and maintaining transportation systems that advance equity and we jointly recognize the complexity of accomplishing such goals.

The COVID-19 pandemic and the ongoing climate crisis underscore that our present systems are not working and there cannot be a “return to normal.” Our state climate, environmental, and transportation policies must improve mobility, air quality, and climate, and redress past environmental and public health inequities for overburdened and underserved communities, such

as those identified by the Commonwealth as environmental justice (EJ) populations. We urge the conference committee to take the following actions to strengthen S.2842, Senate amendment to the House Bill advancing offshore wind and clean energy (House, No. 4524):

- Expand air monitoring and require air quality improvements in air pollution hotspots and corridors; and
- Set ambitious deadlines for public transit electrification.

Below we provide further detail on these critical policies.

The Commonwealth must commit to a final climate bill that centers equity and justice. The Committee should advance two key policies that will contribute to transportation justice.

Our transportation systems are in crisis. Service cuts, safety failures, delayed infrastructure upgrades, and chronic delays deny riders the service we need, while reliance on fossil fuel vehicles degrades our health and the health of our climate. A 2019 report found that Black bus riders on the MBTA lose 64 more hours waiting for the bus than white riders, and Latina/o/x riders lose 11 hours.¹ During the pandemic, riders face crowded conditions on transit routes serving EJ populations even as we depend on transit to make essential trips. Throughout the Commonwealth, transit routes that serve EJ populations have shown the lowest reduction in ridership because people must ride buses and trains to get to and from work and make other essential trips.² Yet, our system is overwhelmed, underfunded, and utterly unprepared for changing conditions.

To meet the needs of the communities at the center of the climate crisis and those hardest hit by COVID-19, Massachusetts must pursue a suite of policies to address disproportionate burdens of pollution, reduce greenhouse gas emissions, and improve our transportation systems. In the short-term (by the end of 2022), the Legislature must take the following actions.

A. Expand and Improve Air Quality Monitoring and Mitigation

In Massachusetts, expanded air monitoring for fine particulate matter (PM_{2.5}) and ultrafine PM is necessary for the state to determine baseline conditions and track improved air quality trends. On average, residents of color in Massachusetts are exposed to pollution from vehicle emissions that

¹ 64 Hours: Closing the Bus Equity Gap, Livable Streets Alliance (Sept. 2019), available at: <https://d3n8a8pro7vhmx.cloudfront.net/livablestreetsalliance/pages/6582/attachments/original/1569205099/Isa-better-buses-2019-v9-20sep19.pdf?1569205099>.

² Massachusetts Bay Transportation Authority, Report from the General Manager to the Fiscal and Management Control Board, slides 4-8 (October 5, 2020), <https://cdn.mbta.com/sites/default/files/2020-10/2020-10-05-fmcb-E-report-from-general-manager-accessible.pdf>.

are 26 to 36 percent higher than the rate of exposure to white residents.³ Studies have shown that even if we implement policies designed to lower emissions from transportation, disparities in air quality in pollution hotspots will continue to persist in 2032.⁴ These findings should be a clarion call to decision-makers: Massachusetts must take proactive steps now to mitigate inequities and improve air quality for EJ populations and communities on the frontlines of pollution. However, the Commonwealth currently lacks sufficient baseline data to even begin to address this inequity and prevent further harm.

We support Section 76 of S.2842, which requires the Massachusetts Department of Environmental Protection (MassDEP) to convene an air quality technical advisory committee and expand air monitoring for ultrafine particles. That section also requires MassDEP to file a report recommending ways to reduce air pollution in pollution corridors and hotspots by 2030. We urge the conference committee to require MassDEP to require air pollution improvements instead of simply filing a report with recommendations by June 30, 2024. We further recommend incorporating language from [H.2230/S.1447](#) on improving indoor air quality.⁵

B. Set deadlines for public transit electrification.

The transportation sector is the largest contributor to GHG emissions in Massachusetts,⁶ and per Governor Baker’s Commission on the Future of Transportation, “[w]ithout further action, transportation sector GHG emissions are projected to increase.”⁷ The Commission emphasized that “bus service, in particular, needs to be reinvented”⁸ and concluded that all buses purchased with state resources should be zero emissions by 2030.⁹ The lifecycle costs of electric buses are lower than that of diesel buses due to reduced fuel costs, fewer maintenance costs, and avoided health costs,¹⁰ and they are quieter and produce no tailpipe emissions. Despite these

³ Maria Cecilia Pinto de Moura, David Reichmuth, Union of Concerned Scientists, “Inequitable Exposure to Air Pollution from Vehicles in the Northeast and Mid-Atlantic,” (June 21, 2019), available at [Inequitable Exposure to Air Pollution from Vehicles | Union of Concerned Scientists \(ucsusa.org\)](#).

⁴ Transportation, Equity, Climate & Health Project, Preliminary Results – Updated February 25, 2021, slides 7, 25 (February 25, 2021), available at <https://cdn1.sph.harvard.edu/wp-content/uploads/sites/2343/2021/02/TRECH-SlidedeckUpdateFeb2021.pdf>.

⁵ [H.2230/S.1447](#), “An Act to Improve Outdoor and Indoor Air Quality for Communities Burdened by Transportation Pollution.”

⁶ Mass.gov, MA GHG Emission Trends: MA and US GHG by Sector, <https://www.mass.gov/doc/appendix-c-massachusetts-annual-greenhouse-gas-emissions-inventory-1990-2017-with-partial-2018/download>.

⁷ Commission on the Future of Transportation, Choices for Stewardship: Recommendations to Meet the Transportation Future: Executive Summary, 3 (December 2018), <https://www.mass.gov/files/documents/2018/12/14/FOTC-ExecutiveSummary.pdf>.

⁸ Commission on the Future of Transportation, Choices for Stewardship: Recommendations to Meet the Transportation Future: Volume 1, at 36 (December 2018), <https://www.mass.gov/doc/choices-for-stewardship-recommendations-to-meet-the-transportation-future-volume-1/download>.

⁹ *Id.* at 54.

¹⁰ U.S. PIRG, “Paying for Electric Buses: Financing Tools for Cities and Agencies to Ditch Diesel,” at 7-8 (2018), <https://uspig.org/sites/pirg/files/reports/National%20-%20Paying%20for%20Electric%20Buses.pdf>. See

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recommendations, progress toward zero-emission fleets has been slow. The deployment of zero-emission buses for our public transit and school bus fleets is necessary to improve our air quality and achieve our climate targets, and these efforts should begin with bus routes that serve and pass through EJ communities.

The Legislature should set public transit electrification targets. We urge targets for the MBTA to operate a fully electric bus fleet by 2030. In terms of operations, we recommend 40% of all MBTA buses should be electric by 2025; 60% by 2027; 80% by 2028; 90% by 2029. To ensure achievement of the milestones, MBTA will only procure electric vehicles on and after December 31, 2023. We further seek prioritized deployment of electric buses on bus routes serving EJ communities—including Chelsea, Everett, Revere, Somerville, Chinatown, Roxbury, Dorchester, Lynn, Mattapan, Fall River, Springfield, Holyoke, Lawrence, and Brockton by 2025.

We support Section 75 of S.2842, which directs MassDOT to provide Regional Transit Authorities (RTAs) with assistance to create an electric bus rollout plan. We urge targets for the RTAs to operate fully electric bus fleets by 2035, with a commitment from MassDOT and the legislature to support the development of comprehensive electric bus plans and charging infrastructure

We also need a fully electric commuter rail system by 2035, with early action on the Fairmount Line, Newburyport/Rockport Line, and Providence Line.

In conclusion, we encourage the Legislature to pass legislation that will implement the transportation and equity provisions discussed herein and establish associated funding sources. If you have questions about this letter, please direct them to Sofia Owen, Staff Attorney, Alternatives for Community & Environment, at sofia@ace-ej.org and Staci Rubin, Vice President, Environmental Justice, Conservation Law Foundation at srubin@clf.org.

Respectfully submitted by the following organizations:

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Environmental and Energy Study Institute, “Battery Electric Buses Fact Sheets: Benefits Outweigh Costs,” (October 2018), https://www.eesi.org/files/FactSheet_Electric_Bus_Benefits_Outweigh_Costs_1018.pdf.

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