

From: Brian Tang [mailto:brian.tang@uconn.edu]
Sent: Wednesday, July 08, 2015 11:39 AM
To: DEEP ClimateChange
Subject: Comment about Council on Climate Change -- Transportation Sector

Dear Governor's Council on Climate Change,

I wholeheartedly support the work you are doing and wish you the best of luck. I worry whether you have been given sufficient administrative or regulatory authority to bring about meaningful reductions in greenhouse gas emissions from the transportation sector. My understanding is that the state DOT has received or will soon receive bonding authority to plan and design several major expansions of highway capacity in our state. More cars and trucks traveling more miles has the potential to undermine whatever emissions reductions we can expect from improved fuel efficiency standards. It seems unfair to me to put the burden of emission reductions on regulated point sources (industries and electricity ratepayers) while highway travel in our state continues to grow.

We need to find a way--whether through NEPA documentation or some other regulatory means--to require highway projects to quantify increases in emissions resulting from expanded highway capacity. The DOT should be held accountable for these emissions. Highway expansion projects resulting in increased emissions should be required to include investments in freight or passenger rail infrastructure, waterborne shipping terminals, public transportation operations, or active transportation enhancements in the same corridor to offset new emissions. If such offsets cannot be achieved, the DOT should be required to divert an amount of funds from the highway bonding that is sufficient to purchase equivalent emission permits from RGGI for the duration of the lifetime of the expanded highway.

I realize this is asking for a radical departure from business as usual, but I am convinced that we need to think on this scale (or bigger) if we want to have any realistic hope of achieving our greenhouse gas emission reduction targets. We need to find a way to incorporate the societal costs of greenhouse gas emissions into the price of highway projects the same way that RGGI has helped to incorporate the cost of power plant emissions into the price of electricity.

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