

November 15, 2021

Governor Roy Cooper  
Office of the Governor  
20301 Mail Service Center  
Raleigh, NC 27699-0301

**Re: Executive Action for an Equitable Clean Transportation Plan**

Dear Governor Cooper,

Executive Order 80 properly set a goal for decarbonizing North Carolina's economy 40% from 2005 levels by 2025. The success of NC DEQ's Clean Energy Plan in setting 2030 and 2050 energy sector emission reduction targets supported by stakeholders provides a model for how the state can address emissions reduction for other sectors. According to North Carolina's Greenhouse Gas Inventory, transportation emissions are the second highest contributor to GHG emissions, second only to electricity, and is expected to soon become the highest contributor. It is important then for your administration to build on the success of EO80 with executive action calling for a Clean Transportation Plan.

We salute the administration for recognizing the importance of reducing transportation emissions. We appreciate the steps you have taken to date to reduce emissions, including last year's agreement to collaborate with other states to decarbonize heavy duty trucks by 2050. We urge the administration to build on these efforts by taking executive action so that carbon emissions from the transportation sector will reach zero CO2 equivalent emissions by 2050. Immediate emission reduction goals, with strong intermediate targets will help set North Carolina on a path to reach this necessary future goal.

As such, we request that you issue an Executive Order noting the importance of transportation to the state's climate goals, and setting the following transportation emission reduction targets:

- 20% transportation sector CO2e (carbon dioxide equivalent) emissions reduction by 2025
- 40% reduction by 2030
- Zero emissions by 2050

As with E.O. 80, reductions should be based on 2005 baseline emission levels. Achieving these targets will require a combination of electrification, increased fuel efficiency, and a reduction in vehicle miles traveled ("VMT"). The following critical actions should be taken:

- To accelerate transportation electrification and vehicle efficiency, NC must adopt the Advanced Clean Truck rule, the NOx Heavy-Duty Omnibus Rule and California's Low-Emission Vehicle Criteria and Zero-Emission Vehicle Regulations under Section 177 of the Clean Air Act.
- To achieve VMT reduction, the state must adopt VMT targets and assess new transportation projects by projected VMT impact, as recommended in our October 2019 letter. NCDOT should partner with Metropolitan and Rural Planning Organizations to incorporate VMT reduction targets into planning and assessments. NCDOT should use its VMT reduction study, the VMT task force, and the upcoming VMT reduction toolkit to help guide planning efforts throughout the State.
- NCDOT should reevaluate its planned transportation spending plan, particularly in light of new federal funding. NCDOT should increase funding of integrated mobility projects such as rail, transit, biking, walking and ride sharing that demonstrate VMT reduction. NCDOT should also reevaluate and reprioritize current and future highway spending through a lens of VMT reduction, and be responsive to priorities starting to be set by MPOs to fund fewer highway expansion projects.

The Executive Order should ensure accountability by requiring the following:

- NCDOT must deliver to the NC Climate Change Interagency Council (NCCCIC) by no more than one year after the issuance of the order a plan for how to achieve the stated emission reduction goals.
- NCDOT must report bi-annually to the NCCCIC on progress towards the emission reduction goals and any other requirements of the order.
- In creating this report NCDOT should convene sub-groups of stakeholders in transportation decarbonization, transportation equity, VMT reduction, along with NESCAUM and LEV/ZEV in order to create detailed road maps on how these provisions of the Clean Transportation Plan can be achieved.

None of these goals should be pursued at the cost of burdening historically disadvantaged communities. With the passage of Executive Order 143, the administration took historic action to address public health, climate change and environmental injustice. As that order states, now is the time to, “[a]dvance climate justice by *prioritizing actions that equitably reduce greenhouse gas emissions*, increase community resilience to the impacts of climate change, and advance sustainable economic and infrastructure recovery efforts for low-income, minority and vulnerable communities.” (emphasis added)

Historically disadvantaged communities lack equitable access both to clean, zero emission transportation and the economic opportunities in the transportation system's construction and maintenance. Historically disadvantaged communities, including communities of color, also disproportionately bear the public health and safety risks created by today's

transportation system. As we transition to a clean transportation system we must work intentionally to reduce the harms, increase benefits and to ensure the participation of these communities as we plan a cleaner, more equitable transportation system.

Sincerely,