



October 21, 2022

Secretary Beth Card and Undersecretary Judy Chang  
Executive Office of Energy and Environmental Affairs  
100 Cambridge Street, Suite 900 Boston, MA 02114

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**RE: A Better City’s Comments on the 2050 Clean Energy and Climate Plan**

Dear Secretary Card and Undersecretary Chang:

On behalf of our 130 member businesses and institutions, thank you for your leadership in developing the 2050 Clean Energy and Climate Plan (2050 CECP). A Better City appreciates the Baker Administration’s commitment to identifying cost-effective and equitable strategies to ensure that Massachusetts meets or exceeds its ambitious, but achievable climate goals.

**EXECUTIVE COMMITTEE**

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A Better City is honored to sit on the Global Warming Solutions Act Implementation Advisory Committee (IAC), and to co-chair the Transportation Working Group and serve on the Buildings Sector Working Group. A Better City staff have reviewed the publicly available CECP presentation in both the IAC meeting and in subsequent CECP hearings. The enclosed comments, which are high-level in nature given the lack of available detail in the CECP presentation, focus primarily on the CECP transportation and buildings sector strategies and include additional comments for consideration regarding natural and working lands, power, and cross-cutting themes. All comments are informed by A Better City’s participation on the IAC and ongoing collaboration with the business community.

In summary, A Better City offers the following recommendations to strengthen the 2050 CECP as the Baker Administration considers final changes before the end of December deadline:

**Transportation Sector Policies:** A Better City urges the Administration to clarify and strengthen the proposed transit-oriented policies and to explicitly affirm the need for further investment in public transit throughout the Commonwealth. The current 2050 CECP approach continues to prioritize zero emission vehicles (ZEVs) over the improvement and expansion of public transit, representing a missed opportunity to maximize co-benefits that will create a more vibrant, equitable, and connected Commonwealth for all. Beyond prioritizing investment in public transit, the 2050 CECP should be sure to provide support for commercial fleets and Light Electric Vehicles (LEVs), consider the advancement of smart roadway pricing strategies through a partnership with federal government, and include employer-focused efforts, among other suggestions.

**Buildings Sector Policies:** A Better City recommends prioritizing deep weatherization as a pre-requisite to building electrification (with sufficient incorporation of digital technologies like Building Automation Systems) and committing to the completion of a study of the projected increase in electricity demand by load zone to inform strategic and sequenced electrification of the building and transportation sectors. A Better City supports the 2050 CECP’s intent to develop a Clean Heat Clearinghouse, establish a climate financing mechanism to spur building decarbonization, and to conduct a public education campaign for building electrification.

Richard A. Dimino  
**PRESIDENT & CEO**

\* Former Chair



**Natural & Working Lands (NWL) Policies:** A Better City recommends establishing baseline data for existing tree canopy and associated tree canopy loss. For privately owned tree canopy, A Better City urges the Administration to explore partnership opportunities around incentivizing tree canopy protection, maintenance, and expansion on privately owned land *first*, before considering regulatory approaches to limit deforestation. We recommend establishing a Developer Focus Group or Private Landowners Task Force to better understand existing governance, financing, and implementation structures for tree canopy maintenance on privately owned NWL. We also recommend the Administration to consider how to prioritize low-canopied environmental justice communities for tree planting efforts.

**Power Sector Policies:** A Better City recommends the Administration include more emphasis and commitment to grid reliability alongside electrification, which will be essential in ensuring a safe transition to a decarbonized economy that avoids power failure. We recommend looking into innovative grid resilience solutions like virtual aggregation of distributed energy resources with flexible load in times of peak load strain on the grid, like in heat emergencies. We also support the ongoing need to ensure equitable energy siting of our energy infrastructure. A Better City recommends that in addition to enabling community-informed processes for equitable energy siting, that the Administration also coordinate these efforts across the anticipated Grid Modernization Council and Transmission Working Group established by the 2022 Climate Act.

**Cross-Cutting & Enabling Policies:** A Better City recommends exploring opportunities for equitable workforce development in Building Automation Systems (BAS), in forestry and other NWL-relevant workforce opportunities, and in the transportation sector. We suggest looking into Boston's recently established [PowerCorps](#) program for equitable workforce development and considering opportunities to replicate such a program within MassCEC. A Better City also recommends considering the establishment of a statewide Resilience Commission to fill gaps in climate leadership. As mentioned previously, A Better City also strongly urges the Administration to include the recommendations of the Climate Justice Working Group, and to commit to sector-specific and cross-cutting climate justice priorities.

The Commonwealth must take bold action now to achieve our climate goals and to create the equitable clean economy of the future, and the business community remains ready and committed to helping achieve these goals. Thank you again for your leadership, and for your time and consideration.

Sincerely,

A handwritten signature in black ink that reads 'Richard A. Dimino'.

Richard A. Dimino  
President and CEO  
A Better City

Enclosures: 5

cc:

Jamey Tesler, Secretary and CEO, Massachusetts Department of Transportation

Steve Poftak, General Manager, MBTA

Patrick Woodcock, Commissioner, Department of Energy Resources

Michelle Wu, Mayor, City of Boston

Jascha Franklin-Hodge, Chief of Streets, City of Boston

Rev. Chief Mariama White-Hammond, Chief of Environment, Energy, & Open Space, City of Boston

Alison Brizius, Commissioner of Environment Department, City of Boston

Oliver Sellers-Garcia, Boston Green New Deal Director, City of Boston

## ATTACHMENT A: DETAILED COMMENTS ON PROPOSED TRANSPORTATION SECTOR POLICIES

### Summary

In addition to our comments on the 2025/2030 CECP, our recommendations for the 2050 CECP are included below. Overall, A Better City appreciates the extension of several key policies to achieve our emissions reduction targets, including the electrification of transit fleets, prioritization of multimodal transportation infrastructure, and expansion of transit-oriented housing development. However, more detail is needed to clarify and strengthen these and other policies—and further investment in public transit is still needed to balance the disproportionate focus on zero emission vehicles (ZEVs). As Governor Baker's own Commission on the Future of Transportation report emphasized, “high-frequency, high-capacity public transit is the most efficient and sustainable way to move large numbers of people as they go about their daily lives. This is true today and will be true in 2040.” The current 2050 CECP approach does not adequately encourage near-term vehicle miles traveled (VMT) reduction to reduce crippling roadway congestion and represents a missed opportunity to maximize co-benefits that will create a more vibrant, equitable, and connected Commonwealth for all. Beyond prioritizing investment in public transit, the CECP should be sure to provide support for commercial fleets and Light Electric Vehicles (LEVs), consider the advancement of smart roadway pricing strategies through a partnership with federal government, and include employer-focused efforts, among other suggestions.

### Extension of Current Policy

- **Implementation of Advanced Clean Cars 2 and Advanced Clean Truck Standards which will require manufacturers to increase the number of zero-emission vehicles on the road.** A Better City appreciates the Commonwealth’s leadership in pursuing the implementation of these programs, which have the potential to transform the market for clean vehicles.
  - **A Better City supports the implementation of the Advanced Clean Cars 2 and Advanced Clean Truck Standards.**
- **Build charging infrastructure, including a network of public fast charging stations sufficient to serve the needs of a fully electrified fleet, as well as support for charging at homes and workplaces.** A Better City appreciates the intent of the policy to build out the charging infrastructure needed to facilitate a widespread transition to ZEVs. Charging infrastructure should be designed to accommodate multiple forms of electric vehicles, including smaller-scale Light Electric Vehicles (LEVs) like e-bikes, e-cargo delivery bikes, e-cargo family bikes, and e-mopeds, rather than favor a single form-factor.
  - **A Better City recommends prioritizing the build out of fast, adaptable charging infrastructure at MBTA-owned parking lots, including commuter rail lots, in addition to other state and municipal government facilities. Additionally, A Better City suggests further exploring opportunities for public-private partnerships to deploy charging infrastructure more rapidly. Infrastructure should be designed to accommodate a range of EVs, including LEVs, and prioritize equitable access to charging infrastructure, including in environmental justice communities.**
- **Continue to expand housing production near public transportation stops.** A Better City recognizes the importance of policies and initiatives like the MBTA Communities & Housing Choice Program that have the potential to catalyze transit-oriented development across the region. However, successful transit-oriented development quite literally cannot happen without the availability of safe, reliable, frequent, and affordable transit service.

- **A Better City recommends coupling any future transit-oriented development strategies with substantial investments in the MBTA and regional transit agencies (RTAs) to improve and expand transit service throughout the Commonwealth. See new policy below for additional recommendations regarding public transit.**
- **Prioritize multimodal transportation infrastructure.** A Better City assumes that multimodal transportation infrastructure includes commuter rail, rail transit, roadways and rights of way to accommodate bus lanes, bike lanes, pedestrian paths, complete streets, stops and stations, and supports including power, communications, signals, lighting, signage, maintenance, maintenance facilities, etc. It may be instructive to consider the Mobility as a Service (MaaS) approach which combines access to various modes of transportation and related services into a single, comprehensive, and on-demand mobility platform.
  - **A Better City supports the prioritization of broadly defined transportation infrastructure to provide sustainable, accessible mobility for all residents, including transit-dependent riders and residents of environmental justice communities.**
- **MassDOT and the MBTA will continue to work to meet the goals for electrification of transit outlined in the Climate Bill and detailed in MBTA Rail Vision.** A Better City appreciates the general commitment to meeting the electrification goals outlined in the recently enacted Climate Acts of 2021 and 2022, as well as the MBTA Rail Vision. However, “work to meet” as indicated in the 2050 CECP does not convey the urgency necessary to meet or exceed the electrification targets as expediently as possible.
  - **A Better City recommends clearly articulating the various targets that are embedded in this policy, including specific electrification timelines and deadlines by mode, as well as a commitment to system-wide carbon neutrality.**
- **Expand EV incentives until the upfront cost of electric vehicles reaches upfront cost-parity with internal combustion equivalents.** A Better City appreciates the intent of this policy and encourages the Commonwealth to ensure that future incentives be available for commercial fleets. Additionally, incentives should be available to support the purchase of LEVs including e-bikes, e-cargo delivery bikes, e-cargo family bikes, and e-mopeds, which can help encourage mode-shift from single occupancy vehicles.
  - **A Better City recommends ensuring that future incentives include options for commercial fleets as well as LEVs for both personal and commercial use.**

#### New Policy

- **Begin to add additional policy incentives to retire old combustion vehicles.**
  - No specific comment.
- **Require commitment to smart charging as part of all EV incentives by 2031.**
  - No specific comment.
- **Adopt fuels policies to promote clean biofuels and hydrogen in difficult to electrify sectors such as aviation, marine and long-haul trucking.**
  - No specific comment.

## Additional Policies for Consideration

- **Modernize, expand, and improve public transit throughout the Commonwealth:** A Better City urges the Commonwealth to set a clear goal for modernizing, expanding, and improving public transit, in addition to the previously discussed commitment to decarbonize the transit system. The CECP should declare that additional resources for the MBTA and RTAs are necessary in the short and long term. Additionally, the CECP should include the assessment of more affordable fare products on the Commuter Rail as well as the establishment of an MBTA low-income fare program (which enjoys [broad public support across the state](#)) to encourage ridership, support low-income communities, and encourage equitable economic growth.
- **Advance smart roadway pricing strategies through a partnership with federal government:** Massachusetts must move toward roadway pricing as a stable source of transportation revenue to maintain and create modern and safe transportation infrastructure, while encouraging mode-shift. Pricing strategies should be rooted in robust stakeholder engagement and provide exemptions and/or rebates for low-income families. Additionally, revenue investments should prioritize transit enhancements that service environmental justice communities and transit-dependent communities. A Better City urges the Commonwealth to develop and implement a smart roadway pricing/toll equity strategy to price the use of roads and bridges more accurately through smarter roadway pricing/tolling to create a regionally equitable road pricing network, raise new revenue for public transit, reduce GHG emissions, and improve air quality, especially for environmental justice population. MassDOT could apply in 2022 to the federal Value Pricing Pilot Program (VPPP) at the U.S. Department of Transportation Federal Highway Administration to evaluate the potential road pricing strategies to reduce traffic volumes, improve driver behavior, increase transit ridership, and address air quality concerns. The Congestion Relief Program, a competitive grant program created by the 2021 Bipartisan Infrastructure Law, could provide an additional funding opportunity.
- **Include employer-focused efforts:** Employer-led efforts to encourage alternatives to single occupancy commutes should be a component of the CECP, but these efforts should not be limited to the encouragement of remote or hybrid work policies, which are only applicable to certain sectors and may have widespread impacts on the economic vibrancy of our downtowns. Transportation Management Associations (TMA) are well-positioned to lead transportation demand management (TDM) strategies and perform a critical accountability function to ensure TDM outcomes are being achieved. A Better City recommends renewed cooperation between the state and TMAs, which are uniquely positioned to advance and track employer-led efforts to coordinate the use of active transportation, connector shuttles, and ferries to complement public transit and to encourage sustainable commuter trips.

## ATTACHMENT B: DETAILED COMMENTS ON PROPOSED BUILDINGS SECTOR POLICIES

### Summary

In addition to the comments provided for the 2025/2030 Clean Energy and Climate Plan, A Better City makes the following comments and recommendations to the 2050 Clean Energy and Climate Plan's policy portfolio for the buildings sector, as presented at public hearings in October 2022. In summary, we recommend that deep weatherization be prioritized as a pre-requisite to building electrification (with sufficient incorporation of digital technologies like Building Automation Systems), and that the State conduct a study of the projected increase in electricity demand by load zone to inform strategic and sequenced electrification of the building and transportation sectors. A Better City supports the CECP intent to develop a Clean Heat Clearinghouse, establish a climate financing mechanism to spur building decarbonization, and to conduct a public education campaign for building electrification.

### Extension of Current Policy

- **Implement a Clean Heat Standard (CHS) as a regulatory approach to meet buildings emissions sublimits through electrification and energy efficiency:** A Better City continues to be concerned that there is not enough emphasis on prioritizing, incentivizing, and implementing deep weatherization opportunities *first*, prior to the consideration of electrified buildings. Deep weatherization and deep energy retrofits are the most important transformation within the buildings sector to ensure that electrification is successful, affordable, and expediently done. We therefore urge the Administration to clarify that deep weatherization will be a pre-requisite to heat pumps and other electrification efforts in buildings, to help reduce strain on the grid and lower electricity costs for rate payers as buildings decarbonize. We also want to highlight the role of digital technologies, like Buildings Automation Systems, in complementing deep weatherization. Building Automation Systems (BAS), provide greater flexibility in building operations by developing setpoints and optimizing for energy efficiency by space and occupancy at different times of the day. We therefore recommend expanding opportunities for digital technologies that support BAS and the associated equitable workforce development required to train a BAS-fluent workforce. Finally, A Better City also recommends including specific opportunities to leverage Mass Save for deep energy retrofits and weatherization in commercial and industrial (C&I) buildings, in partnership with the newly formed Commercial & Industrial Working Group for the Energy Efficiency Advisory Council.
  - **A Better City recommends that deep weatherization be prioritized as a pre-requisite to building electrification within the 2050 CECP, and that digital technologies like Building Automation Systems be included as complementary approaches to deep weatherization to ensure the greatest energy efficiencies in the operation and decarbonization of our buildings. A Better City also recommends considering specific opportunities to leverage Mass Save for deep energy retrofits and weatherization in commercial and industrial (C&I) buildings.**
- **Instruct utilities to conduct coordinated planning for targeted natural gas decommissioning and electric distribution and transmission systems:** As mentioned in previous comments, A Better City supports the coordinated planning of a comprehensive energy transition approach. As both buildings and transportation sectors transition to electricity, we suggest a study be conducted to understand the resulting increase in electricity demand by load zone and sub load zone over time, in conjunction with understanding the current capacity of the grid by load zone and sub load zone. This would help to understand what areas have the capacity for electrification now, and what areas will require additional capacity before pursuing electrification. Conducting a study on electric capacity by load zone would help to sequence the electrification of buildings and transportation based on current and new electrical capacity, to ensure that the increasing demand is safely and strategically managed, and grid failure is avoided.
  - **A Better City recommends the 2050 CECP include a study of the projected increase in electricity demand from electrified buildings and transportation by load zone and sub load zone, alongside**

the current electrical capacity of each load zone and sub load zone. Such a study would help to ensure electrification is sequenced appropriately and safely by load zone. We recommend this study be done in coordination with the newly established Grid Modernization Council and Transmission Working Group, as per the 2022 Climate Act.

- **Develop a Clean Heat Clearinghouse as a center point of contact for customers for all clean energy solutions (e.g., deep weatherization and energy efficiency measures, solar, heat pumps, EV charging, storage):** A Better City supports the development of a Clean Heat Clearinghouse as a one-stop-shop for clean energy solutions. As there are already many leading programs and experts for clean energy solutions, it is essential to build upon these resources and existing expertise, as opposed to reinventing the wheel. We have also noticed that many resource hubs offer robust residential clean energy solutions but lack the same resources for large commercial and industrial buildings, whose emissions reduction potential is the greatest. We recommend ensuring resources for all buildings are provided.
  - **A Better City supports the development of a Clean Heat Clearinghouse, provided that it can help to build and expand upon existing resources and expertise. We also recommend expanding resource offerings for large commercial and industrial buildings, some of the largest emitters in the state, as many existing resource hubs tend to focus primarily on residential clean energy solutions.**
- **Establish climate finance mechanisms to de-risk and mobilize private sector investments for buildings pursuing deep decarbonization:** A Better City supports the establishment of a finance mechanism like a climate or green bank in Massachusetts to help spur deep decarbonization of existing buildings. We suggest connecting with the Boston Green Ribbon Commission and their efforts to establish a two-year pilot for a MA/Boston Climate Bank to help fund equitable decarbonization of the built environment. This effort is intended to help equitably fund compliance with Boston’s BERDO 2.0 and similar building decarbonization policies and is being jointly pursued by the Green Ribbon Commission, City of Boston, MassCEC, Bank of America, and others. We also suggest leveraging federal funding opportunities like the Inflation Reduction Act for seed funding. Finally, we recommend considering what governance structures will be needed to equitably, transparently, and effectively administer and govern the disbursement of funds over time (e.g. there currently is no existing governance structure that could allocate climate resilience funds at a regional scale, for example, across jurisdictions within the Commonwealth – please see our “climate leadership” recommendations below).
  - **A Better City supports the establishment of a finance mechanism and recommends connecting with the Boston Green Ribbon Commission and considering how to leverage federal funding opportunities like the Inflation Reduction Act for seed funding. We also recommend considering what governance structures will be needed to equitably, transparently, and effectively administer and govern the disbursement of funds over time.**
- **Conduct a comprehensive public education campaign and implement community-level engagement to build momentum for building electrification:** A Better City supports the implementation of a public education campaign to build momentum for building electrification. We recommend the campaign include all building types.
  - **A Better City supports the implementation of a public education campaign for building electrification and urges the Administration to consider additional staff capacity to help provide technical assistance to stakeholders engaged in the public education campaign as well as building owners seeking to decarbonize their building portfolios.**

## ATTACHMENT C: COMMENTS ON PROPOSED NATURAL & WORKING LANDS (NWL) POLICIES

### Summary

In addition to our comments on the 2025/2030 CECP, our recommendations for the 2050 CECP are included below. A Better City remains concerned that there is not sufficient emphasis on establishing baseline data for existing tree canopy and associated tree canopy loss on both public and private land, nor is there sufficient emphasis on a need to partner and coordinate with private landowners on NWL solutions (given that the majority of existing NWL in Massachusetts are privately owned). We also urge the Administration to consider how to prioritize tree equity in low-canopied environmental justice communities for tree planting efforts, and how to partner with private landowners, land trusts, community-based organizations, and the business community on NWL solutions for privately owned land. A Better City urges the Administration to explore partnership opportunities around incentivizing tree canopy protection, maintenance, and expansion on privately owned land *first*, before considering regulatory approaches to limit deforestation. We recommend establishing a Developer Focus Group or Private Landowners Task Force, similar to what Boston did while gathering input for the 20-Year Urban Forest Plan, to better understand existing governance, financing, and implementation structures for tree canopy maintenance on privately owned NWL.

### Extension of Current Policy

- **Expand NWL conservation with federal and state funding, state support to municipalities and Regional Planning Associations (RPAs), and options to channel private investments to NWL conservation:** While we agree that more private investments are needed in NWL conservation, we are concerned that the 2050 CECP policies presented do not do enough to consider how to track, manage and steward, and fund NWL conservation on privately owned land, *in partnership* with large private institutional landholders. Given that over 60% of Boston’s existing tree canopy is held on privately owned land, and that the majority of our statewide NWL are in private ownership – it would be helpful to empower solutions that partner with large institutional and private landowners across the state on tree canopy data, preservation, maintenance, and expansion on private land. Finally, we recommend considering releasing a Request for Information on what is needed for tree planting on privately owned land as in the case of Boston’s efforts around private tree canopy, and how such initiatives may build upon the leadership of land trusts and private land conservation groups in the Commonwealth. It will be especially important to explore public-private partnerships, incentive programs, and collaborative opportunities with private landowners first, *before* considering regulatory pathways like tree protection ordinances that would encroach on private land management (see more under “explore regulatory pathways to limit deforestation,” below).
  - **A Better City recommends that the 2050 CECP track tree canopy coverage data over time on both public and privately owned land and partner with large institutional and private landowners on solutions for NWL. We also recommend launching a RFI for tree planting and maintenance on privately owned land, like with [Boston’s recently released RFI](#), to help build partnership with private landowners, land trusts, and relevant stakeholders on long-term private tree canopy stewardship and maintenance.**
- **Encourage local tree supply and expand planting efforts to more state partners (e.g. NGOs, schools, youth groups):** As mentioned above, we are concerned that there is not enough baseline data or coordination with private landowners and institutional landowners on NWL solutions, in addition to proposed efforts on public lands and with state partners. A Better City supports and appreciates the earlier CECP commitments to expanding new tree canopy coverage and climate-smart forestry, as well as the expansion of the 2050 CECP’s intent to encourage local tree supply and planting efforts. However, we are concerned that there is not enough emphasis on *existing* tree canopy maintenance and stewardship in addition to local tree supply, nor on the workforce required to maintain a healthy tree canopy throughout the state. With new trees in Boston seeing mortality rates of around 40% in early years of planting, and with the threat of land conversion from



development across the state, we urge the Administration to consider how to better protect, preserve, and maintain existing forest canopy in partnership with private landowners. We recommend prioritizing the maintenance of existing tree canopy clusters when possible, which are more effective in delivering climate and community resilience co-benefits than individual plantings of trees. Additionally, we are concerned that there is not sufficient emphasis on improving tree equity across the Commonwealth's communities and ensuring that our lowest canopied neighborhoods are prioritized first in new planting opportunities. Finally, we urge the State to consider the workforce required to maintain and steward tree canopy in perpetuity, and to pursue training programs for forestry similar to the [PowerCorps](#) model in Boston, alongside the ongoing support of land trusts and private land conservation organizations.

- **A Better City recommends establishing baseline data and targets for protecting and maintaining existing tree canopy on both public and private land, as well as targets for improved tree equity that prioritize low-canopied environmental justice neighborhoods whenever possible. Finally, we recommend establishing statewide programs to support equitable workforce development in forestry to help build the workforce required for ongoing maintenance and stewardship of healthy tree canopies.**
- **Develop methodologies for quantifying GHG emissions implications of large-scale land clearing and potential options for mitigation:** A Better City remains concerned that there is no stated intent to track carbon sequestration or carbon removals associated with baseline tree canopy and/or expanded tree canopy in NWL over time. Before developing methodologies for quantifying the GHG implications of large-scale land clearing, we believe that it will be important to establish existing tree canopy and associated GHG emissions data *first*, to help establish baselines for existing tree canopy, as well as rates of tree canopy loss on different land typologies throughout the state. Without these baselines, the State will not be able to track progress or the effectiveness of mitigation options for land clearing. In particular, we are curious how the NWL sector targets and metrics for mitigation of land clearing will relate to privately owned land, particularly institutional land. It would be helpful to empower solutions that partner with large institutional and private landowners across the state on tree canopy data, preservation, maintenance, and expansion on private land whenever possible.
  - **A Better City recommends that the 2050 CECP establish baseline tree canopy coverage and tree canopy loss data on both public and privately owned land, prior to the consideration of mitigation options for land clearing, and empower NWL solutions that partner with private and institutional landowners across the state.**

#### New Policy

- **Explore regulatory pathways to limit deforestation:** As mentioned above, A Better City is concerned that the 2050 CECP does not place enough emphasis on partnership and collaborative opportunities with private landowners on tree canopy maintenance, expansion, and the avoidance of tree canopy loss. Within Boston's 20-Year Urban Forest Plan development process, A Better City sat on the Community Advisory Board as a Collaborating Partner, and also worked with the City to hold a Developer Focus Group, which was facilitated by a consultant and allowed private landowners and developers to share their comments on tree protection ordinances and similar policies intended to protect tree canopy from deforestation. In the Developer Focus Group and throughout meetings with private landowners, there were a lot of concerns voiced about the unintended consequences that tree protection ordinances may have on stalling affordable housing development. Additionally, with new tree planting mortality as high as 40% in Boston, with new tree plantings dying in many cases from threats beyond the landowner's control (e.g. from drought, gas leaks, storm/wind damage, etc.) – we are concerned about considerations of regulatory pathways for limiting deforestation, before empowering landowners with the information and staff capacity needed to sufficiently maintain and steward tree canopy long-term.

- **A Better City recommends the State release a 20-Year Forest Plan, including considerations for expanded tree equity and public-private partnerships, *before* considering any regulatory frameworks to limit deforestation. In particular, we recommend establishing a Developer Focus Group or Private Landowners Task Force at the state-level to help establish baseline data, governance structures, and financing gaps in private tree canopy, and to help inform opportunities for incentivizing better stewardship and expansion of tree canopy on privately owned land.**

#### Additional Policies for Consideration

- **Incorporate climate and community resilience co-benefits within NWL targets:** Beyond the CECP's focus on climate-smart forestry practices that benefit decarbonization and resilience, A Better City recommends prioritizing nature-based solutions that enhance community and climate-resilience co-benefits whenever possible across the strategies of the NWL sector. Given the opportunity for nature-based solutions to provide co-benefits that can help to address extreme heat, extreme precipitation and storm damage, coastal and inland flooding, sea level rise, storm surge, and other severe climate impacts, we believe that ensuring co-benefits across community and climate resilience in this sector will be vital to achieving our climate goals and protecting our communities in as cost-effective a manner as possible. We also recommend encouraging regional community and climate resilience co-benefits to ensure nature-based solutions that work across jurisdictional boundaries and benefit multiple communities.
- **Prioritizing environmental justice and historically disinvested communities in our nature-based solutions and ensuring tree equity:** We appreciate the addition of 2050 CECP targets looking to permanently conserve 40% of Massachusetts land and water and to add at least 64,000 acres of new and riparian trees by 2050. As mentioned previously, we are concerned that there is no mention of tree equity in the NWL targets for 2050. Beyond the Greening Gateway Cities Program, we also believe that it will be vitally important to prioritize retaining and expanding tree canopy in environmental justice communities like Springfield that have disproportionately high risks of asthma and other negative health impacts from air pollution, high heat exposure during heat waves, and disproportionately low tree canopy coverage. We recommend following the [20-Year Urban Forest Plan](#) model in Boston, as well as the [Heat Resilience Solutions for Boston report](#). We also recommend prioritizing Municipal Vulnerability Preparedness grants that operate at a regional scale whenever possible.
- **Clarifying and defining best practices for carbon removals and carbon sequestration accounting:** We appreciate the ongoing efforts to include carbon sequestration accounting, measurement, and market frameworks in the Commonwealth's climate solutions in the NWL sector. However, we are concerned that there are no clear targets, metrics, or best practices for carbon sequestration included in the CECP, nor are there any recommendations for the ongoing governance and stakeholder engagement needed for effective, transparent, and equitable carbon removals in Massachusetts. A Better City suggests including the targets and metrics for carbon sequestration from the 2050 Decarbonization Roadmap Study within the 2050 CECP itself, as well as the establishment of a Carbon Sequestration Task Force. Since the initial ideation of a Carbon Sequestration Task Force was intended to work across state agencies only, we recommend either expanding representation of the Task Force to include stakeholders with expertise in carbon removals like A Better City's membership, or to establish a parallel Carbon Sequestration Working Group that would partner with the Task Force. Finally, A Better City recommends referring to our June 2021 report [Establishing a Regional Offsetting Program for Emissions Reduction Compliance in Massachusetts: Challenges and Opportunities](#) and its associated recommendations for effective, transparent, and equitable carbon removal best practices in the Commonwealth.

## ATTACHMENT D: COMMENTS ON PROPOSED POWER SECTOR POLICIES

### Summary

In addition to our 2025/2030 CECP comments, A Better City offers additional considerations below for the power sector. We recommend the Administration include more emphasis and commitment to grid reliability and affordability alongside electrification, which will be essential in ensuring a safe transition that avoids power failure. We recommend looking into innovative grid resilience solutions like virtual aggregation of distributed energy resources with flexible load in times of peak load strain on the grid (like in heat emergencies). We also support the ongoing need to ensure equitable energy siting of our energy infrastructure. A Better City recommends that in addition to enabling community-informed processes for equitable energy siting, that the Administration also coordinate these efforts across the anticipated Grid Modernization Council and Transmission Working Group.

### Extension of Current Policy

- **Modernize electric distribution system infrastructure to facilitate electrification and other decarbonization strategies:** With the anticipated increase in electricity demand, the resilience of our electricity supply is also essential for a safe transition to a decarbonized economy. We are concerned that the current plan does not directly address grid resiliency alongside decarbonization. Some key elements we would like to see supported and incentivized include district-based microgrids, expanded energy storage (long-duration and largescale storage, as well as building-specific), and peak demand management with distributed energy generation resources to ensure the grid's peak demands are reduced as much as possible. We recommend looking into opportunities for scaling up distributed energy generation during peak load events in Massachusetts, assessing lessons learned from California. In addition, it will be important for critical grid infrastructure to be resilient to the impacts of climate change, like extreme heat, extreme precipitation and storm damage, sea level rise, storm surge, and both coastal and inland flooding.
  - **A Better City recommends the 2050 CECP include strategies and incentives for programs like microgrids, storage, and peak demand management to ensure grid resiliency. We also recommend ensuring that the 2050 CECP encourage critical electric grid infrastructure upgrades to be resilient to the impacts of climate change, including extreme heat.**
- **Ensure that siting for solar, offshore wind, transmission, and distribution infrastructure consider the impact on EJ communities:** A Better City supports the need to ensure equitable energy siting that also keeps pace with demand. While we appreciate that the 2022 Climate Act establishes an anticipated Grid Modernization Council and Transmission Working Group, we urge the Administration to convene these groups, in partnership with utilities, businesses, and environmental justice community stakeholders, as soon as possible. Additionally, we continue to hear from our membership about delays in interconnection for needed renewable energy projects, and we also urge the Administration to consider opportunities to expedite and streamline the interconnection process for renewable energy projects that are already in development.
  - **A Better City recommends convening the Grid Modernization Council and Transmission Working Group as soon as possible, and ensuring that both groups work with businesses, utilities, and environmental justice communities in the expedient and equitable siting of needed energy infrastructure.**

## ATTACHMENT E: CROSS-CUTTING & ENABLING POLICIES

### Summary

A Better City appreciates the addition of cross-cutting and enabling policies into the 2050 CECP. We recommend exploring opportunities for equitable workforce development in Building Automation Systems (BAS), in forestry and other NWL-relevant workforce opportunities, and in the transportation sector. We suggest looking into Boston's recently established [PowerCorps](#) program for equitable workforce development and considering opportunities to replicate such a program within MassCEC. A Better City also recommends considering the establishment of a statewide Resilience Commission to fill gaps in climate leadership. Finally, as in our previous comment letters, we urge the Administration to include the recommendations of the Climate Justice Working Group, and to commit to sector-specific climate justice goals within each sector of the CECP, in addition to committing to cross-cutting climate justice priorities across all sectors of the CECP.

- **Workforce Development:** As mentioned above, we believe that significant equitable workforce development is needed to complement deep weatherization and decarbonization of existing buildings through digital technologies like Buildings Automation Systems (BAS), as well as within our forestry and maintenance of tree canopy on both private and public lands. There are also significant opportunities within the transportation sector, in which workforce development could help to fill needed positions within the MBTA and regional transportation agencies, as well as anticipated positions to come with the decarbonization and modernization of our transportation systems.
  - **A Better City supports the focus on equitable workforce development opportunities as a cross-cutting priority of the 2050 CECP and suggests looking into Boston's [PowerCorps](#) model for equitable workforce development at the state-level.**
- **Climate Leadership - Establishing a Statewide Resilience Commission:** We remain concerned that there is not a sufficient governance structure at the state-level to coordinate and lead climate and community resilience efforts across jurisdictions. While we appreciate the leadership and transformative successes of the Municipal Vulnerability Program (MVP), we are concerned that this does not go far enough to ensure the strategic, coordinated, and *regional* approaches to resilience that will be needed to fortify the very infrastructure needed to achieve our emissions reduction goals, including our transit system and electric grid. Since much of our critical infrastructure is cross-jurisdictional, and as we anticipate multiple opportunities to leverage federal funding in addition to a possible MA Climate Bank, we strongly recommend the establishment of a statewide Resilience Commission to help govern, implement, and finance needed regional climate and community resilience initiatives.
  - **A Better City recommends establishing a statewide Resilience Commission to help govern, implement, and finance regional climate and community resilience initiatives and lead opportunities to leverage federal funding.**
- **Environmental Justice (EJ) and a Just Transition:** A Better City recommends revisiting the cross-sector climate justice priorities put forward by the IAC's Climate Justice Working Group and including climate justice commitments in each sector detailed in the CECP. We also recommend including overarching CECP recommendations on the equitable funding and financing of a transition to a decarbonized economy, including but not limited to establishing a Massachusetts Climate Bank to help leverage public-private partnerships, regional initiatives, and multi-year climate solutions to help fund the critical infrastructure needed to achieve our statutory climate commitments. As suggested above, we recommend connecting with the Boston Green Ribbon Commission on their two-year pilot project for a MA/Boston Climate Bank. Finally, we suggest the CECP consider equitable climate governance commitments that can help govern, implement, and finance our climate solutions over time. We appreciate the recent establishment of a state-level Environmental Justice Council as mandated by the Climate Act of 2021 and are eager to hear more details

about the incorporation of the Council’s recommendations into the 2050 CECP. Specifying and affirming equitable climate governance, implementation, and financing commitments in the 2050 CECP will help to hold the Commonwealth accountable in ensuring that no one is left behind as we transition to a decarbonized economy.

- **A Better City suggests considering the cross-sector CECP recommendations from the IAC Climate Justice Working Group, as well as including sector-specific climate justice commitments in the CECP. We also recommend establishing a Massachusetts Climate Bank to help fund and finance an equitable transition to a decarbonized economy. Finally, we recommend the inclusion of recommendations from the recently established Environmental Justice Council into the 2050 CECP itself.**