



March 22, 2021

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Secretary Kathleen A. Theoharides  
Executive Office of Energy and Environmental Affairs  
100 Cambridge Street, Suite 900  
Boston, MA 02114

Dear Secretary Theoharides:

On behalf of our 130 member businesses and institutions, thank you for your vision and leadership in developing both the 2050 Decarbonization Roadmap and the Interim Clean Energy and Climate Plan for 2030 (CECP). A Better City appreciates the Baker Administration's commitment to identifying cost-effective and equitable strategies to ensure that Massachusetts reduces greenhouse gas emissions by at least 85% by 2050 and achieves net-zero emissions.

A Better City is honored to sit on the Global Warming Solutions Act Implementation Advisory Committee (IAC) and to serve on both the Transportation Working Group and Buildings Sector Working Group. The enclosed comments are informed by A Better City's participation on the IAC and ongoing collaboration with the business community. A Better City is grateful for the opportunity to review the interim CECP and respectfully submits the enclosed comments, which focus primarily on the CECP transportation and buildings sector strategies.

Overall, the CECP transportation sector strategies fail to prioritize investment in public transit, instead focusing almost exclusively on the promotion of zero emission vehicles (ZEVs). This short-sighted, one-dimensional focus on ZEVs contradicts Governor Baker's own Commission on the Future of Transportation report, which stated that "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 CECP transportation 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.

Similarly, the narrowly-focused CECP buildings sector strategies emphasize the electrification of thermal heating systems, neglecting to adequately acknowledge or address the major hurdles that must be overcome in order to electrify systems in commercial, industrial, and institutional building stock. These hurdles include enormous technical and financial constraints associated with implementing so-called deep energy retrofits, as well as access to a qualified workforce and access to clean, reliable, affordable electricity. As explored further in A Better City's June 2020 report, "[Thermal Electrification of Large Buildings in the Commonwealth](#)," a variety of policies and strategies will be required to address the market barriers to thermal electrification technologies.

In summary, A Better City offers the following recommendations to strengthen the CECP:

- **Transportation Sector:** A Better City urges EEA to revise the CECP to include a new standalone strategy to modernize, expand, and improve public transit throughout the Commonwealth and to decarbonize train and bus fleets, including the MBTA's commuter rail and bus systems. Beyond prioritizing investment in public transit, the CECP should advance smart roadway pricing strategies; set more aggressive, annual VMT reduction targets for all passenger vehicle trips, not just for commutes; prioritize the electrification of commercial fleets, including delivery vehicles; incentivize the development of flexibly-designed commercial EV charging infrastructure, as well as the purchase of e-bikes; support Transportation Management Association (TMA)-led transportation demand management (TDM) strategies as well as the development of active transportation infrastructure; and ensure the affordability of clean, reliable power via the grid.
- **Buildings Sector:** A Better City recommends adding a suite of new standalone strategies to address the following overlooked priorities: deep energy building retrofits; workforce development; grid and building electric capacity; clean, reliable, and affordable electricity; and statewide financing strategies. Additionally, A Better City recommends targeted changes to the proposed stretch energy code development and implementation process; additional analysis to assess the impact of phasing out combined heat and power (CHP) incentives in the commercial, industrial, and institutional sectors; the addition of an A Better City representative on the Clean Heat Commission; and further study of low-and zero-carbon fuels to understand how they could support commercial building decarbonization.
- **Other:** A Better City suggests establishing a new strategy within the natural and working lands chapter to develop offsetting best practices to inform the proposed market-based accounting frameworks for carbon sequestration. Moreover, A Better City recommends expanding the composition of the Carbon Sequestration Task Force to include a representative from A Better City and other carbon offset experts in the Greater Boston business community.



As the Commonwealth begins its post-pandemic economic recovery, uncertainty about the future of work trends and the related impacts on the real estate sector cannot be used as an excuse to further delay long-needed investment in public transit, which is the backbone of our regional economy. Additionally, COVID-19 recovery and financial uncertainty should not stymie state investment in the efficiency and decarbonization of our commercial, industrial, and institutional buildings. The Commonwealth must take bold action now to achieve our climate goals and to create the clean economy of the future.

Thank you again for your leadership and for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Richard A. Dimino', written in a cursive style.

Richard A. Dimino  
President and CEO

Enclosures: 3

cc: Jamey Tesler, Acting Secretary, Massachusetts Department of Transportation  
Judy Chang, Undersecretary of Energy  
Steve Poftak, General Manager, MBTA  
Martin J. Walsh, Mayor, City of Boston  
Kim Janey, City Council President, City of Boston  
Chris Osgood, Chief of Streets, City of Boston  
Chris Cook, Chief of Environment, City of Boston

## ATTACHMENT A: Detailed Comments on Chapter 2 Transforming Our Transportation Systems

### **Summary Comments & Recommendations**

In their 2018 report, Governor Baker's Commission on the Future of Transportation stated that “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.” However, the CECP strategies for reducing emissions from the transportation sector are almost exclusively focused on subsidizing zero emission vehicle purchases, dismissing the potential of reducing emissions through expanded access to public transit. The CECP’s one-dimensional focus on ZEVs does not adequately encourage near-term VMT reduction. Additionally, this approach does not mitigate the extreme roadway congestion that has crippled Greater Boston or make meaningful progress toward achieving transportation equity.

Also in 2018, A Better City and AECOM released the [“The Transportation Dividend: Transit Investments and the Massachusetts Economy”](#) report quantifying the economic benefits and value of the MBTA system serving Greater Boston. The report found that our public transit system returns economic benefits worth five times the cost of operations, and many of those benefits are experienced daily by residents. While past investments have paid off, without renewed, long-term investments, Massachusetts risks the ability to continue recover, grow, and thrive.

The final CECP must affirm the foundational principle of the Commission on the Future of Transportation report and seize the opportunity presented in The Transportation Dividend report by prioritizing investments in public transit to support our climate, mobility, and equity goals. As acknowledged in the CECP, the electrification of the MBTA commuter rail and bus system would make progress toward achieving our GHG reduction targets. However, the capital investments needed to achieve system-wide electrification are largely unfunded.

A Better City is grateful to sit on the Global Warming Solutions Act Implementation Advisory Committee (IAC) and to serve on the Transportation Working Group. Unfortunately, the vast majority of the [IAC Transportation Working Group's recommendations](#) are not reflected in the CECP, including the recommendation to increase investment to expand public transit and enhance multi-rider mobility programs and to assess and deliver smart roadway pricing strategies.

By focusing solely on ZEVs at the expense of other strategies, the draft CECP represents a missed opportunity to maximize co-benefits that will create a more vibrant, connected, and accessible Commonwealth for all. While the CECP must of course prioritize GHG reductions, it should do so by advancing strategies that can help achieve other interrelated objectives, including enhanced equity,

public health, mobility, economic development, and overall quality of life.

As such, A Better City urges EEA to revise the CECP to include a new standalone strategy to modernize, expand, and improve public transit throughout the Commonwealth and to decarbonize train and bus fleets, including the MBTA's commuter rail and bus system. Beyond prioritizing investment in public transit, the CECP should advance smart roadway pricing strategies; set more aggressive, annual VMT reduction targets for all passenger vehicle trips, not just for commutes; incentivize the electrification of commercial fleets, including delivery vehicles; incentivize the development of flexibly-designed commercial EV charging infrastructure, as well as the purchase of e-bikes; support Transportation Management Associations (TMA)-led transportation demand management (TDM) strategies as well as the development of active transportation infrastructure; and ensure the affordability of clean, reliable power via the grid.

### **New Strategy: Modernize, Expand, and Improve Public Transit Operations Throughout the Commonwealth and Decarbonize Trains and Bus Fleets**

- A Better City urges the Commonwealth to set a clear goal for “modernizing, expanding, and improving public transit,” not simply “investing in clean transportation solutions”—this should be a standalone strategy and the objective should also be woven into the other existing strategies, as appropriate.
- A Better City urges the MBTA to move forward with critical foundational investments to advance Regional Rail as endorsed by the Fiscal Control and Management Board in November 2019, including electrification of the commuter rail network, frequent all-day service, and accessible stations with high-level platforms. Full transformation of this mode could result an 150% increase in daily commuter rail boardings (+122,400 new transit trips), thus fewer vehicle hours and miles traveled and reduced congestion, reduced GHG emissions, and positive benefits to environmental justice communities in terms of accessibility, mobility, and environmental quality.<sup>1</sup>
- A Better City urges EEA to work with the MBTA and with local communities to identify sites along commuter routes that are suitable for transit-oriented development (TOD) and can also meet critical housing needs, reduce VMT, and support economic development objectives.
- A Better City implores the Commonwealth to prioritize the decarbonization of transit and other bus fleets and to provide new regulatory and financial incentives for the MBTA and RTAs. Such incentives should include: (a) reducing, if not eliminating, peak-load and peak-demand utility charges to public transit agencies for power used to fuel battery electric buses (BEB) vehicles and fleets; (b) taking necessary steps to immediately provide for off-peak utility pricing to public transit agencies for power used to fuel BEB vehicles and fleets; (c) requiring that all new public

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<sup>1</sup> <https://cdn.mbta.com/sites/default/files/2019-10/2019-10-18-rail-vision-advisory-committee-meeting-presentation-accessible.pdf>

transit bus maintenance facilities be designed and constructed with all electrical substation and conduits to enable direct current fast charging (DCFC) access for each BEB vehicle to be housed at any such new facility; (d) providing immediate and substantial direct financial incentives to the MBTA and RTAs to encourage purchase of BEB vehicles and fleets and install complimentary DCFC infrastructure as needed. See A Better City's August 2019 report "[New MBTA Bus Maintenance Facilities & Evolving Battery Electric Bus Technology, Case Study: Albany Street Garage](#)" for additional context and recommendations.

### **Strategy T1: Cap Transportation Sector Emissions and Invest in Clean Transportation Solutions**

- A Better City supports the intent of this strategy—but recommends enhancing and expanding the proposed actions. As described above, A Better City urges the Commonwealth to set a clearer goal for “modernizing, expanding, and improving public transit,” not simply “investing in clean transportation solutions”—this should be a standalone strategy and the objective should also be woven into the other existing strategies, as appropriate.
- Regarding the currently proposed actions, A Better City supports and appreciates the Commonwealth’s leadership in establishing the Transportation and Climate Initiative Program (TCI-P), and urges the Commonwealth to strategically invest TCI-P revenue to modernize, expand, and improve public transit, and to provide active transportation and micro-mobility options, particularly serving transit-dependent communities. Further, A Better City urges the Commonwealth to engage directly with communities and with the business sector to identify and implement investment priorities.
- A Better City also supports the intent of establishing a regional Low Carbon Fuel Standard (LCFS), though additional information about program structure is needed. As new fuels are developed and distributed, A Better City encourages the Commonwealth to avoid potential negative impacts to environmental justice communities, many of which have been disproportionately burdened by the production, transport, and storage of fuel.

### **Strategy T2: Implement Coordinated Advanced Clean Vehicle Emissions and Sales Standards**

- A Better City supports the proposed implementation of the California Advanced Clean Cars II Standard, requiring that all new LDV sales must reach about 50% by 2030 and be 100% ZEV by 2035; the California Advanced Clean Trucks rule; and the California Advanced Clean Fleets rule. A Better City also supports the ongoing collaboration with other jurisdictions under the Zero Emission Medium- and Heavy-Duty Vehicle Memorandum of Understanding and Action Plan to provide a framework for achieving 30% of all new truck and bus sales being ZEVs by 2030 and 100% by 2050.
- As discussed above, A Better City implores the Commonwealth to prioritize the decarbonization of public transit and other bus fleets.

### **Strategy T3: Reduce Upfront ZEV Purchase Cost Burden**

- A Better City recommends that the Commonwealth take immediate steps to strengthen the proposed actions to commit to providing MOR-EV rebates at point of sale in 2021 and to commit to launching a low and moderate income (LMI) consumer program for ZEVs.
- A Better City recommends EEA consider extending incentives and rebates to include micro-mobility options like e-bikes.
- A Better City supports the development of a heavy-duty ZEV incentive program and again encourages the Commonwealth to prioritize the decarbonization of transit and other bus fleets.

### **Strategy T4: Deploy Electric Vehicle Supply Equipment & Enable Smart Charging**

- A Better City appreciates the intent of the proposed actions to build out and maintain the charging infrastructure needed to facilitate a widespread transition to ZEVs—but encourages the Commonwealth to also take a more aggressive posture in implementing (not just exploring, piloting, or analyzing) the critical incentive programs and rate structures.
- A Better City encourages EEA to launch a utility-based commercial charging incentive program. Additionally, A Better City recommends that DOER consider ways to encourage the development of charging infrastructure as part of the revised stretch energy code for buildings. As explored further in the buildings section of this comment letter, the development of the stretch energy code must be guided by robust stakeholder engagement from design, engineering, construction, and building operations practitioners.
- A Better City recommends that charging infrastructure be designed to accommodate multiple forms of electric vehicles, including smaller-scale micro-mobility options like e-bikes and e-scooters and low emission vehicles like e-mopeds and powered quadcycles, rather than favor a single form-factor.
- A Better City also emphasizes that the Commonwealth's efforts ensure the affordability of clean, reliable power via the grid and prioritize equitable access to charging infrastructure, including in environmental justice communities.

### **Strategy T5: Engage Consumers & Facilitate Markets**

- A Better City appreciates the intent of the proposed actions to increase consumer awareness and to catalyze the expansion of the clean transportation market—and encourages EEA to adopt a stronger focus on incentives and pilots to expedite commercial fleet conversion across the commercial, industrial, and institutional sectors.
- A Better City suggests that delivery sector opportunities include strategies to encourage the use of light-duty electric delivery vehicles like e-bikes and e-trikes.

## Strategy T6: Stabilize Light-Duty VMT & Promote Alternative Transportation Modes

- A Better City urges the Commonwealth to pursue a more aggressive VMT reduction strategy that is rooted in strategic, substantial investments in the modernization, expansion, and improvement of public transit. The Commonwealth should set annual VMT reduction targets for all passenger vehicle trips, not just for commutes.
- A Better City urges the Commonwealth to develop and implement a smart roadway pricing/toll equity strategy to encourage mode shift, raise additional revenue for public transit, and reduce roadway congestion. With the anticipated advances in fuel efficiency and potential growth in the use of electric vehicles, these policies indirectly threaten the long-term viability of the gas tax as a stable, robust, and predictable source of transportation revenue. Massachusetts must move toward roadway pricing as a stable source of transportation revenue to maintain and create modern and safe transportation infrastructure.
- A Better City recommends reinstating state funding for Transportation Management Associations (TMAs), which are uniquely positioned to advance employer-led efforts to coordinate the use of private shuttles and ferries to complement public transit and to encourage commuter transit use and active transportation.
- A Better City encourages EEA to coordinate with MassDOT and municipalities to invest in developing the infrastructure needed for commuters to safely choose active modes of transportation, including cycling. A recent A Better City survey, "[Anticipating Post-Pandemic Commute Trends in Metro-Boston](#)," showed that two thirds of respondents live 10 miles or less from their office, elucidating a tremendous opportunity for the Commonwealth to encourage active transportation options for Greater Boston commuters. MassDOT should be empowered to accelerate trail/off-road path construction to transform the Emerald Necklace into a regional superhighway.
- A Better City supports efforts to encourage and incentivize a broad range of smart growth policies, and encourages EEA to link these efforts with public transit investments, roadway pricing strategies, and transit-oriented development policies.



## ATTACHMENT B: Detailed Comments on Chapter 3 Transforming Our Buildings

### Summary Comments & Recommendations

A Better City's comments in this section are specific to strategies within the buildings sector, specifically relevant to commercial, industrial, and institutional buildings. These comments also assume that the version of the Climate Bill (S.30), currently on Governor Baker's desk, is ultimately signed into law.

The CECP strategies for reducing emissions from the buildings sector are almost exclusively focused on the electrification of thermal heating, which excludes huge hurdles ahead, including: deep energy building retrofits; workforce development; grid and building electric capacity; clean, reliable, and affordable electricity; and a statewide financing program or climate bank. As explored further in A Better City's June 2020 report "[Thermal Electrification of Large Buildings in the Commonwealth](#)," a variety of policies and strategies will be required to address the market barriers to thermal electrification technologies.

Therefore, in addition to the strategy-specific feedback outlined below, A Better City recommends that EEA develop standalone strategies for each of the following priorities:

- **Prioritize Deep Energy Retrofits:** Deep energy retrofits in commercial buildings are currently untested. We have worked diligently with members and partner organizations over the last two years to encourage the piloting of deep energy retrofits in different building typologies, without success. Although the CECP report states that about 40% of HVAC equipment is expected to retire in commercial buildings in the next decade and that for many of these buildings, heat pump systems will be the least-cost decarbonization option, our members have reported that without pursuing deep energy retrofits first, a heat pump system would at least double energy costs. Our members are also concerned that these costs will escalate with increased ventilation requirements post-pandemic. As these deep energy retrofits happen infrequently, A Better City recommends establishing a dedicated funding source beyond Mass Save incentives to advance deep energy retrofits in the commercial, industrial, and institutional sectors.
- **Establish Foundational Workforce Development Initiative:** The goals of the CECP cannot be accomplished without a strategic, comprehensive workforce development initiative to train our residents for the jobs of tomorrow. Although mentioned as an action item in Strategy B2 and Strategy B3, workforce development should be elevated to its own, standalone strategy with an emphasis on providing career training and placement for those in underserved and environmental justice communities. The specific skills that will be required include the design and construction of deep energy building retrofits; the design and construction of high efficiency buildings; the installation and operation of heat pump technologies; the installation and

maintenance of onsite renewables and the procurement of offsite renewables; and broadly-defined building operations. A Better City urges EEA to launch a comprehensive workforce development initiative in partnership with the private sector to uplift environmental justice communities and to fill the critically-needed jobs of the future. (See Strategy B2 below for additional feedback).

- **Expand Grid and Building Electric Capacity:** Grid and building electric capacity will both need to be expanded substantially to compensate for the anticipated increase in electricity demand from electrified buildings, as well as other soon-to-be electrified sectors of the economy, like transportation. As mentioned above, retrofits are essential to limiting this increase in energy demand within buildings, but even with retrofits, most buildings will require significant electricity capacity upgrades. To enable these upgrades, A Better City recommends that EEA prioritize the expansion and modernization of generation, transmission, and distribution infrastructure systems.
- **Ensure Clean, Reliable, and Affordable Electricity:** The provision of clean, affordable, and reliable electricity is a prerequisite for achieving a decarbonized buildings sector. As mentioned above, our members have reported that without pursuing deep energy retrofits first, a heat pump system would at least double energy costs. A Better City encourages EEA to use all available regulatory tools to ensure access to clean, reliable, and affordable electricity for residential and commercial customers alike.
- **Establish a Statewide Financing Program or Climate Bank:** Additional funding and financing models are needed to scale up building sector decarbonization. Although mentioned in Strategy B3, this statewide financing program for decarbonization needs to be elevated to its own strategy. A Better City encourages EEA to establish a comprehensive funding and financing strategy to support deep energy retrofits (including pilots of deep energy retrofits within commercial building typologies that do not currently exist), equitable workforce development, renewable energy generation and accessibility, clean heating, cooling and ventilation, and projects that advance both GHG reduction and climate adaptation. Additionally, EEA should remove barriers to building decarbonization in other state funding/financing programs, such as the Community Preservation Act and Massachusetts School Building Authority.

### **Strategy B1: Avoid Lock-In of Building Systems That Are Not 2050-Compliant**

A Better City supports EEA in developing a new high-performance stretch energy code to allow the Commonwealth to move toward net-zero for new construction in a deliberative, phased manner that is guided by expert industry input and enabled by the provision of incentives.

- A Better City does not support the timeline for a new high-performance stretch energy code to be presented to the BBRS in 2021 and that allows for Green Communities to opt in starting in 2022. We suggest the development and promulgation of a new high-performance stretch energy

code be extended to 18 months to align with the pending climate bill and the 10<sup>th</sup> edition of the Massachusetts Building Code.

- A Better City recommends launching a robust stakeholder engagement process to develop a phased update of the stretch energy code. This process should be guided by a technical advisory group of Massachusetts-based practitioners representing all facets of real estate and the real estate development process. Expertise reflected on the advisory committee should span the residential, mixed-used, commercial, and industrial sectors and include those familiar with energy-intensive building stock like universities, healthcare facilities, labs, and data centers.
- A Better City also recommends ensuring that the stretch energy code itself be structured in a phased manner to account for both technical and cost constraints—the cost-competitive availability of building technologies and the availability of reliable, clean, affordable power via the grid must lead these timelines. In general, the compliance timeline for the commercial sector should not be the same as the compliance timeline for the smaller-scale residential sector, as there are not currently sufficient examples of net-zero or extremely high performing large commercial buildings in our climate zone. Additionally, special considerations and hardship exemptions must be made for certain commercial and industrial building typologies like universities, healthcare facilities, labs, and data centers that operate 24/7 and have unique energy-intensive needs. Overall, the timeline should align with the MA Building Code 10th Edition, which is expected to be finalized in late 2022 /early 2023 through the BBRS.
- It is our understanding that this new high-performance stretch energy code would establish three codes in the near-term: the existing stretch energy code, the new high-performance municipal opt-in stretch energy code, and the base building code. In 2028, when the updated stretch energy code potentially becomes the base building code, then there will only be one code. ABC recommends clarifying this interplay in the CECP language.
- A Better City recommends requiring the provision of incentives to support stretch energy code compliance and technological innovation. Despite the strides made to date, we have been unable to identify tangible examples of large-scale, commercial/institutional net-zero building projects in our climate zone beyond the Boston University Center for Computing & Data Sciences.

### **Strategy B2: Pivot the Market for Building Envelope Retrofits and Clean Heating Systems**

- While A Better City supports the broader alignment of the Commonwealth’s energy efficiency programs and climate targets, we believe that additional analysis is needed to assess the impact of phasing out combined heat and power (CHP) incentives on the limited commercial and

industrial (C&I) market segments that can still benefit from CHP's energy and non-energy benefits in the near-term, as well as the present lack of available alternative technologies and fuels that can meet these specific needs. CHP systems can provide substantial energy efficiency and resiliency benefits to large C&I building owners in key market segments (e.g., healthcare, manufacturing) and can be a crucial transitional option for hard to decarbonize buildings.

- A Better City therefore recommends reassessing incentives for gas-fueled CHP and that the energy-intensive market segments that benefit most from CHP have exemptions (e.g., by sector, energy use intensity, etc.) to any incentive rollback where the energy and resiliency benefits of CHP cannot be suitably replaced by other technology options.
- Additionally, we suggest as part of a CHP assessment that the potential role of and enhanced incentives for biogas in serving existing and new CHP systems are investigated. In particular, many businesses in Massachusetts generate and must properly dispose of significant quantities of food and other organic wastes, which could be harnessed to support increased availability of anaerobic digester gas to reduce the emissions impact of existing and new CHP systems.
- A Better City supports the need for refinement and enhancement of workforce development programs related to building decarbonization. However, what is proposed is not adequate to meet either the magnitude or the immediacy of clean energy workforce development needs if we are to meet the stated CECP goals. As discussed above, A Better City recommends that building workforce development and training be developed into a separate strategy to create the critically-needed jobs of the future, including the design and construction of deep energy building retrofits; the design and construction of high efficiency buildings; the installation and maintenance of heat pump technologies; the installation and maintenance of onsite renewables installation and the procurement of offsite renewables; and broadly-defined building operations.
  - A Better City also supports the emphasis on equitable workforce development in underserved and environmental justice communities. In particular, we support attracting and training young and diverse participants through increased outreach and collaboration with vocational and technical schools and increased funding for internships, apprenticeships, and other job placements. Roxbury Community College's [Smart Buildings Technology Program](#) is an excellent example of this. Broadening this clean energy workforce in the buildings sector—and proactively partnering with the private sector—will be critical in ensuring that a pipeline of trained workers is available to meet our targets.

### Strategy B3: Convene the Commission and Task Force on Clean Heat & Cap Heating Fuel Emissions

- A Better City understands and appreciates that there is not a one-size-fits-all clean heating solution for buildings in Massachusetts and that not every building can currently be cost-effectively electrified.
  - We recently learned that the Commission and Task Force on Clean Heat are two separate entities and request this is made clearer in the CECP. Our understanding is that the Commission on Clean Heat will be made up of a range of stakeholders. We request this includes a diverse set of experience and skills that span the residential, mixed-used, commercial, industrial, and institutional sectors and includes those practitioners within buildings that are more difficult or expensive to electrify. Given our role working with large commercial building owners and tenants, we request including a representative from A Better City on the Commission. In addition to leading the Commercial Real Estate Working Group for the Boston Green Ribbon Commission, A Better City sits on the IAC buildings working group, is working with the City of Boston on the proposed Building Performance Standard for existing buildings, and sits on two of the technical advisory groups for Boston's Zero Net Carbon Standard for New Construction.
- A Better City also recommends EEA conduct a study of low-and zero-carbon fuels to understand how they could support building decarbonization, particularly in large commercial and institutional building types that are more difficult and/or more expensive to electrify. As stated in the Buildings Sector Report of the 2050 Decarbonization Roadmap, these technologies have constraints such as they are not readily available today, may take longer to scale, may face fuel supply limitation, or may be more expensive to use relative to operating an electric heat pump. However, it is important to understand the optimal application of hydrogen and other decarbonized fuels for these harder to decarbonize building types sooner rather than later.

## ATTACHMENT C: Detailed Comments on Chapter 6 Protecting Our Natural and Working Lands

### Summary Comments & Recommendations

Over the past year, A Better City has been actively engaging our member organizations, partner organizations, and stakeholders across all sectors around best practices for carbon offsetting. Due to climate commitments at the city- and state-level in Massachusetts, we know that up to 10% of emissions in the City of Boston under “net zero” could be accounted for through tools like offsets and up to 15% of statewide emissions could be compensated for by offsets come 2050. While the CECP for 2030 does not explicitly mention offsets, Strategy L4: Develop Market Sequestration and Accounting Frameworks will require the establishment of accounting and market-based structures like a regional offsetting program.

A Better City recommends establishing a new strategy within the natural and working lands chapter to develop offsetting best practices to inform the proposed market-based accounting frameworks for carbon sequestration referenced in Strategy L4. Particularly as Strategy L4 references a market-based framework that could operate at a regional scale in a way that allows the purchasing of “least-cost sequestration services from its neighbors across the Northeast,” it will be vital for the CECP to establish offsetting best practices at the state-level, as well as across the region. In particular, the Commonwealth will need to ensure that there is no double counting within the participating Northeast states and no “leakage” of emissions outside the accounting system’s region. Additionally, it would be helpful for offsetting best practices to align with existing U.N. Sustainable Development Goals (SDGs), to allow for stakeholders to also maintain their international climate commitments.

Finally, the CECP does not specify if Strategy L4 will solely address future emissions, or will also address the sequestration of historic emissions in the Commonwealth. A Better City recommends EEA provide further clarification on the scope of the intended market-based sequestration and accounting frameworks. More detail on recommended offsetting best practices and the CECP’s Carbon Sequestration Task Force may be found below:

- **Offsetting Best Practices:** These must prioritize market sequestration frameworks that are verifiable, transparent, equitable, and permanent in order to ensure an effective achievement of the CECP’s carbon sequestration goals. A Better City recommends:
  - Following the PAVER+ framework for offsetting, developed by the World Resources Institute, which stands for permanent, additional, verifiable, enforceable, and real offsets, with the additional “plus” capturing co-benefits beyond CO<sub>2</sub> emissions sequestration or avoidance. Such co-benefits could include air quality and health

benefits, stormwater retention and other ecosystem services, and local community workforce development, to name a few examples.

- Including the additional best practice of “contemporary relevance” or ensuring that any carbon credits sold and accounted for within the Northeast region are available at the time of sale, rather than realizing their full potential at a future date after the time of sale.
- Committing to a “no net loss” policy for natural and working lands at both a state-level and regional scale, to ensure that our existing carbon sequestration “sinks” are utilized to their best ability in order to accomplish our CECF sequestration goals.
- **Carbon Sequestration Task Force:** A Better City has engaged our member organizations across sectors as well as partner organizations interested in carbon offsetting over the last year. We therefore recommend that A Better City and other carbon offset experts in the Greater Boston business community be included on the Carbon Sequestration Task Force. As our members operate at the local, regional, state, national, and international levels, we believe that our expertise and research in offsetting best practices at various geographic scales and across different sectors’ needs will help to strengthen the outcomes of the Carbon Sequestration Task Force, due to convene in 2021.