



September 30, 2025

OFFICERS

James M. Tierney
CHAIR

Kara Buckley
VICE CHAIR

Kimberly Sherman Stamler
VICE CHAIR

Jeanne Pinado
TREASURER

Elizabeth Grob
CLERK

EXECUTIVE COMMITTEE

Robert Biggio
Michael Cantalupa*
Joseph Carroll
Donald Chiofaro
Andrew J. Dankwerth
Lawrence S. DiCara, Esq.*
John E. Drew*
Ronald M. Druker
Rita Kiki Edozie, PhD
Kristen Hoffman
Jessica Hughes
Thomas J. Hynes, Jr.
Mark R. Johnson
Allan Juwonoputro
William F. X. Kane
James G. Keefe
Edward Ladd
Christopher W. Maher
Michael E. Mooney, Esq.*
Young K. Park
Thomas Tilas
Yanni Tsipis
Dana E. Warren
David Wilkinson

Kate Dineen
PRESIDENT & CEO

Richard A. Dimino
PRESIDENT EMERITUS

*former Chair

Brian Swett

Chief Climate Officer, Environment, Energy and Open Space Cabinet (EEOS)

Oliver Sellers-Garcia

Environment Commissioner & Green New Deal Director

Chris Osgood

Director, Office of Climate Resilience

RE: A Better City's Comments on the Draft Climate Action Plan 2030 Update

Dear Chief Swett, Commissioner Sellers-Garcia, and Director Osgood:

On behalf of A Better City's 130 member businesses and institutions, thank you for the opportunity to provide comments on the City of Boston's 2030 Climate Action Plan (CAP) draft. A Better City appreciates the Wu Administration's vision and leadership, and strongly supports many provisions of the draft CAP, at a time when Boston continues to experience the worsening impacts of climate change.

Overall, A Better City appreciates the intent of the proposed strategies and encourages the City to consider the financial and technical feasibility of any new guidelines or requirements. As discussed in our September 18th focus group conversation, several A Better City members—many of whom are global industry leaders in decarbonization and resilience—have expressed concern about the projected and unknowable costs of compliance with potential new regulations, especially amid unprecedented economic uncertainty and destabilization of the renewable energy market.

As you work to further refine this draft, A Better City recommends streamlining and prioritizing the recommendations with an eye toward feasibility and impact. The enclosed comments provide recommendations across several categories, including buildings, transportation, energy, recovery and materials, open space, combating heat, combating stormwater and inland flooding, coastal flooding, combating cross-hazard climate risks, workforce development, and funding and financing.

A Better City remains eager to partner with the City of Boston on advancing actionable and equitable climate solutions that will help build a more vibrant, competitive, sustainable, and equitable city and region for all. Thank you for your ongoing partnership and leadership.

Sincerely,

Yve Torrie

Director of Climate, Energy, & Resilience

A Better City

A BETTER CITY'S RECOMMENDATIONS FOR THE DRAFT CLIMATE ACTION PLAN (CAP) 2030 UPDATE:

Buildings

General Comments: A Better City members understand the importance of and remain committed to Boston's climate leadership, and at the same time, have identified significant challenges within the development community, which make new projects even more challenging to finance and build in current economic conditions. Members support continuous improvement on emissions and energy use reduction and have expressed concern that there is little understanding about the cost of delivering these "products." The result will be less execution of projects, and slowed growth and development, which will make it even harder for Boston to remain competitive. A Better City welcomes working with the City of Boston on how to address development challenges, and to schedule follow up focus groups or additional member engagement when helpful. A Better City members have also raised concerns about their inability to influence tenants' energy use, which can be the largest energy use in a building. A Better City recommends that the City work with the real estate community to find ways to engage tenants effectively, as is the case outside of the U.S.

- **B1:** A Better City supports the strategy to expand support structures for BERDO implementation via the Equitable Emissions Investment Fund, Building Decarbonization Advisor Program, and expanded educational and outreach efforts.
 - A Better City recommends continuing to work with BERDO-covered building owners on BERDO implementation and related challenges as they navigate economic uncertainty, which may require more flexibility around how to achieve decarbonization goals for large existing buildings. Specifically, A Better City's members suggested projecting the amount expected each year in the Equitable Emissions Investment Fund to help understand the projected impact of the Fund in meeting emissions reduction targets. Additionally, given that the Large Building Energy Retrofit program received American Rescue Plan Act (ARPA) federal funding, A Better City recommends clarifying how the City plans to fill this funding gap moving forward.
- **B2:** A Better City supports the strategy to improve demand response to minimize brownouts and blackouts in Boston.
 - A Better City recommends designing demand response programs to be prepared for extreme temperature events, including peak demand during extreme heat emergencies, as many environmental justice neighborhoods already experience rolling brownouts and blackout risk in the heat. To help support demand response, A Better City also recommends the City advance strategies to establish "islandable" community microgrids.
- **B5:** A Better City supports and appreciates the strategy to implement, extend, and expand the Boston Energy Saver program, as well as its reference to both commercial and nonprofit buildings.
 - A Better City recommends clarifying how the Boston Energy Saver Program may apply to commercial and nonprofit buildings, and work with building owners to address any challenges that may arise.
- **B7:** A Better City supports the strategy to collaborate with state partners to help increase available funding for building decarbonization.
 - A Better City encourages the expansion of both funding and financing opportunities to support the decarbonization of large existing buildings decarbonization, especially in the C&I sector. A Better City has long advocated for the establishment of a program like the [Empire Building Challenge](#).
- **B11:** A Better City appreciates the strategy to minimize permitting challenges in order to support building decarbonization, however, it remains unclear which permit structures this strategy intends to address.
 - A Better City recommends clarifying what kinds of permits are being targeted in strategy B11, whether it is building or energy permitting and whether it relates to new construction or existing building retrofits. A Better City would also like clarification on which permits the City has

jurisdiction over, and how these relate to ongoing state-level efforts to streamline permitting for clean energy projects.

Transportation

General Comments: Overall, A Better City appreciates the attention to transportation policies that are necessary to reduce harmful carbon emissions, improve public health, and promote different options for traveling safely throughout this region. With the exception of one recommendation to advocate for sustainable transportation funding from state and federal resources, the ideas in this category can be advanced by city government in the next few years and would help address our mobility challenges. In rolling out the final CAP and policies informed by the CAP, A Better City strongly recommends prioritizing earnest and robust engagement with both residents and the business community early in the process. Especially regarding potentially contentious topics like street redesign and parking policy, an objective analysis of the various tradeoffs and potential economic costs and benefits is paramount.

- **T1:** A Better City supports the strategy to improve access to the Fairmount line and other regional rail, however, would appreciate more specifics on what this might entail.
 - A Better City recommends clarifying to what extent this strategy would impact the number of parking lots in Boston, and to what extent it could also prioritize more opportunities for BlueBikes stations and secure bicycle parking, for example.
- **T2:** A Better City supports the strategy to expand infrastructure, incentives, and public training to encourage safer biking in Boston.
 - A Better City recommends clarifying key targets and goals for this strategy between now and 2030, and suggests re-affirming and, when possible, expanding upon the goals in the GoBoston 2030 Plan to ensure alignment.
- **T3:** A Better City supports the strategy to increase publicly available charging infrastructure.
 - A Better City recommends that any electric work or maintenance done in areas with potential for public charging, include capacity and connection upgrades to help accommodate micromobility charging, whether for individual vehicles or battery cabinets. Additionally, A Better City recommends learning from the work of peer cities on battery safety, including [NYC DOT's e-bike charging and battery swap pilot program](#). Finally, when possible, A Better City recommends exploring opportunities for community resilience hub locations like libraries and community-based organizations to be paired with charging and micromobility options.
- **T4:** A Better City appreciates and supports the CAP's strategies to plan for density near transit and to establish vehicle miles traveled (VMT) as a key performance metric for this strategy, as well as ongoing efforts to revise transportation demand management measures.
 - A Better City recommends providing more specificity and clarifying how the City intends to achieve these outcomes, particularly in sections T4.1-T4.3. Regarding VMT goals, A Better City also recommends clarifying how the City intends to implement planning for density near transit, zones for walkability, and measuring parking requirements, as referenced in this section. Finally, A Better City recommends an audit and enforcement study be included in proposed revisions to the Transportation Demand Management (TDM) Points System and parking regulatory changes.
- **T5:** A Better City supports the strategy to establish a sustainable logistics plan and related task force, as well as to establish priority pickup and drop off zones for electric vehicle transportation network companies.
 - A Better City recommends engaging A Better City's Transportation Management Agencies (TMAs) for this strategy, particularly around curb management. Additionally, it would be helpful for the sustainable logistics plan and task force to address transportation network companies (TNCs) more holistically, beyond delivery alone. Finally, A Better City is curious why priority pickup/drop off zones are only being considered for electric vehicles and not considered for all TNC trips. To help

address congestion and related emissions from slow and/or idling vehicles, A Better City recommends establishing best practices, rules, and zones for pickup/drop off of people and freight.

- **T7:** A Better City appreciates the strategy to maximize curbside and off-street parking for electric vehicle adoption and pedestrian safety.
 - A Better City recommends incorporating parking for micromobility vehicles, in addition to electric vehicles and trucks. Additionally, A Better City recommends exploring a policy of “daylighting” crosswalks in downtown intersections and using the space close to the corners for micromobility corrals.
- **T9:** A Better City appreciates the strategy to perform a market analysis of public and private electric vehicle charging capabilities.
 - A Better City recommends that any market analysis of EV charging capacity includes any potential connections and upgrades for micromobility charging, in addition to electric vehicles and trucks.

Energy

General Comments: A Better City’s healthcare members have federal requirements regarding backup generation, mandating that they have fossil fuel backup at hospitals and healthcare facilities in the near-term and medium-term future. A Better City recommends working with hospitals and healthcare members to understand challenges around energy decarbonization and resilience for hospital systems. Finally, throughout the CAP, it would be helpful to affirm healthcare centers and hospitals as critical infrastructure needed to help safeguard frontline communities.

- **E1:** A Better City appreciates and supports this strategy’s intention to increase the amount of renewable energy capacity supplied to the Boston grid.
 - A Better City recommends clarifying how the City of Boston intends to expand clean energy capacity for Boston, given current federal roadblocks.
- **E2:** A Better City supports and would like to learn more about the intention to develop a renewable energy procurement strategy for large- to medium-sized property owners.
 - A Better City recommends establishing a focus group of property owners that have experience in virtual power purchase agreements (vPPAs), particularly with multiple property owners across sectors. Such a focus group would benefit from members like PowerOptions, MIT, Harvard, Boston University, Mass General Brigham, and A Better City, among others.
- **E3:** A Better City supports the strategy to determine priority sites for future energy infrastructure siting.
 - A Better City recommends working closely with state and federal permitting authorities, utilities, and local communities to ensure that new energy infrastructure is developed thoughtfully and expeditiously. As feasible, A Better City suggests prioritizing the development of the infrastructure needed to provide reliable power to critical facilities, economic hubs, and vulnerable communities.
- **E5:** A Better City strongly supports the strategy to develop safety and emergency response criteria for battery energy storage systems.
 - A Better City recommends clarifying whether this strategy applies only to City buildings, or to all battery storage systems in Boston, and to what extent this strategy would involve updating the fire code to accommodate battery storage. Additionally, A Better City recommends developing best practices and design guidelines for battery storage systems and community microgrids that comply with Boston’s fire code.
- **E6:** A Better City supports the strategy to develop a holistic, citywide energy plan to guide a just transition to a clean, resilient, and affordable energy system.
 - A Better City recommends affirming that resilience within this strategy includes a reliable energy system, which will be particularly important during times of peak demand, clean energy development, and limited grid capacity. Additionally, A Better City recommends naming energy burden as a key challenge for affordable energy systems and defining metrics that would help to

minimize energy burden in Boston. In order to help improve access to clean and affordable energy for vulnerable residents, A Better City recommends partnering with and expanding [Boston Medical Center's Clean Power Prescription Program](#), and working with hospitals like BMC to identify which residents in Boston need help paying for electricity, and those that depend on plug in medical equipment.

Recovery & Materials

- **R2:** A Better City supports and appreciates the need to reduce embodied carbon during deconstruction of existing buildings and renovations.
 - A Better City recommends working with Boston Building Resources and related organizations like Save That Stuff to understand what would be needed to establish deconstruction infrastructure at a scale that would be required for Boston's citywide deconstruction efforts. A Better City recommends defining deconstruction best practices as a key success metric for the CAP between now and 2030, as well as identifying the deconstruction infrastructure (and related businesses/partners) that will be needed to scale up deconstruction capacity.
- **R3:** A Better City has concerns about a proposed deconstruction ordinance that could potentially hinder development, increase construction timelines, and therefore increase construction costs, all at a time when there is not sufficient support infrastructure and capacity to implement this.
 - A Better City recommends identifying models of deconstruction ordinances in other cities, how successful they have been, what challenges they have faced, and then working with real estate developers to develop an implementable deconstruction infrastructure. Until this foundation for deconstruction is developed, implemented in partnership with developers, and measured over a number of years, A Better City recommends taking a deconstruction ordinance off the table.
- **R4:** A Better City has concerns about the timing for leveraging Net Zero Carbon (NZC) Zoning to tackle embodied carbon, given that many developers are already challenged with the cost and feasibility of building in Boston, while complying with city- and state-level policies and codes. As the NZC Zoning is still in nascent stages of implementation, only intended to begin gathering information on embodied carbon at this stage, A Better City is concerned that it is too early to begin considering performance standards for embodied carbon.
 - A Better City recommends clarifying if there are examples of embodied carbon policies in other cities, and to what extent they leverage NZC or similar zoning policies for embodied carbon regulation. When possible, it would be helpful to provide more information on how such policies collect embodied carbon data, and how these data factor into compliance.

Open Space

- **O1:** A Better City appreciates and supports the strategy to strengthen existing tree policies, expand and protect existing canopy, and ensure long-term maintenance.
 - A Better City recommends establishing metrics for tree canopy expansion and survival, prioritizing low canopied heat island neighborhoods for implementation. Relevant metrics for tracking urban tree canopy efforts in Boston could include percent tree canopy cover by heat island neighborhood, percentage of native trees and related biodiversity, and tree planting survival rates. Additionally, A Better City recommends supporting and expanding programs that engage local residents in tree care, watering, and maintenance, like the GreenRoots Tree Keeper Program. Finally, to help support the expansion of the Boston Tree Alliance's efforts on privately owned land, A Better City recommends publishing case studies of successful urban forestry strategies that can be replicated on private land.

- **O2:** A Better City appreciates and supports the strategy to expand open and green space through strategic land use planning, including the use of resilience deployables across both flooding and extreme heat to enhance community resilience and emergency preparedness.
 - A Better City recommends working with A Better City members to pilot and showcase the use of both flood and heat resilience deployables. Additionally, A Better City recommends expanding this strategy to include piloting deployables in privately owned public spaces (POPS) and other private land throughout Boston. Finally, A Better City recommends uplifting case studies of successful examples of deployables in use across Boston that could be replicated and scaled up.
- **O3:** A Better City appreciates and supports the strategy to pilot expanded nighttime lighting in open spaces.
 - A Better City recommends working with the Greenway Business Improvement District (BID) on piloting lighting expansion along the Greenway and in other public open spaces. Additionally, such pilot projects could explore opportunities to combine public art with public lighting and other resilience strategies.

Combating Heat

General Comments: A Better City recommends leveraging public-private partnerships for heat resilience pilots and data analysis to inform policy implementation, including examples like the [B-COOL partnership](#), [C-HEAT](#), [Community Adaptation to City Heat \(CATCH\)](#), [Common SENSES](#), [Wicked Hot Boston](#), and other research efforts by local academic institutions. Additionally, A Better City recommends naming the intersection of heat and air quality impacting heat-vulnerable populations, particularly for people with respiratory illnesses and asthma. A Better City also urges the CAP to frame extreme heat as a threat to critical infrastructure as well as vulnerable communities, and to identify a strategy for combating heat that addresses vulnerable critical infrastructure during heat events (ex. power grid brownouts and blackouts, transportation systems' failure, potential impacts to airport tarmac and highways from melting or buckling asphalt in the heat, inability of community health centers and hospitals to maintain operations during heat emergencies, etc.). Finally, it would be helpful to understand potential impacts of extreme heat on the regional economy (ex. impacts to labor productivity).

- **H1:** A Better City supports and would like to continue its partnership with the City on the expansion of extreme heat interventions, via A Better City's Extreme Heat Working Group.
 - A Better City recommends working with extreme heat researchers and practitioners in the A Better City Extreme Heat Working Group to establish best practices for both short-term heat relief during declared heat emergencies and advisories, as well as long-term heat resilience interventions working toward cooler buildings, commutes, and neighborhoods. Additionally, for heat relief and resilience across multiple hazards, A Better City recommends establishing community resilience hubs at local libraries, community health centers, recreational facilities, faith-based institutions, and community-based organizations to serve as trusted distribution hubs for cooling resources (as mentioned below in the combating cross-hazard climate risks section, Boston could benefit from replicating [New Orleans' Community Lighthouse Project](#)).
- **H2:** A Better City appreciates the recent passage of heat worker protections for city workers and contractors, which unanimously passed City Council in August.
 - A Better City recommends working with the A Better City's Extreme Heat Working Group to pilot voluntary heat worker safety protections for privately employed workers, leveraging large employers in sectors like construction, healthcare, and hospitality. Additionally, it would be helpful for the City to clarify if data are available regarding the impact of heat on workers in Boston (both indoor and outdoor), and to what extent unions are engaged in heat worker protection efforts.
- **H3:** A Better City supports the effort to expand the cooling toolkit through innovative pavement types, roofs, shade structures, and other solutions.
 - A Better City recommends pursuing a shade pilot to identify design specs and best practices for awning and other fabric/pop-up shade structures, in places where tree planting may not be possible. Additionally, A Better City recommends pursuing a tree planting pilot for minimal street

space in partnership with the Boston Tree Alliance to understand how to overcome space constraints in neighborhoods like Chinatown.

- **H4:** A Better City appreciates the objective to establish maximum indoor air temperatures and utility shut-off protections for extreme heat.
 - A Better City recommends pursuing a study on what would be required to update the state sanitary code for indoor maximum temperature requirements, and to explore how models from other jurisdictions like Louisiana might be applied here. Potential emergency shut-off protections should be developed in coordination with utilities, relevant state agencies, and local heat-vulnerable communities, and informed by the best available scientific data.

Combating Stormwater and Inland Flooding

General Comments: It would be helpful for the CAP to explicitly name the link between stormwater, combined sewer overflows (CSOs), and impacts on waterways and beaches. A Better City recommends considering the incidence of combined sewer overflow events and related beach closures as a metric relevant to successful stormwater retention efforts.

- **S1:** A Better City supports efforts to incentivize stormwater mitigation on private property.
 - A Better City recommends clarifying what kinds of incentives the City might consider for stormwater mitigation on private property, and how this would work with the existing stormwater fee and program run by Boston Water and Sewer, and related efforts by the Office of Green Infrastructure. A Better City also recommends publishing case studies and models for successful stormwater retention on private property, to provide examples of the kinds of interventions that the City hopes to incentivize and scale.
- **S2:** A Better City supports the strategy to complete more green infrastructure projects in our streets and parks.
 - A Better City recommends working with the PowerCorps Boston urban forestry tract to enhance green infrastructure on publicly accessible private land, like privately owned public spaces (POPS). Additionally, A Better City recommends working with the Streets Cabinet, Office of Climate Resilience, and Office of Green Infrastructure to strategically install green infrastructure projects along major bicycle routes and transit hubs across the city, which would help to expand green infrastructure and stormwater retention while also moving the needle on establishing “cool commute” corridors as suggested by the 2022 Heat Plan.
- **S4:** A Better City appreciates the need for a citywide inundation model for stormwater and inland flooding, alongside existing modeling for coastal flooding and flood pathways.
 - A Better City recommends clarifying the intent of use for the citywide inundation model, and whether it might change the current Coastal Flood Resilience Overlay District, for example. A Better City recommends ensuring consistency and alignment of the best available science across coastal flooding, stormwater, and inland flooding, as well as alignment with regional and state-level resilience efforts.

Coastal Flooding

General Comments: A Better City appreciates the City’s establishment of the [Office of Climate Resilience](#) to lead the City’s all-of-government response to the challenges of coastal flooding, in addition to stormwater flooding and heat. Partnership with both state and federal partners, as well as private and public landholders, is critical to ensuring the financing, construction, and maintenance of large-scale coastal resilience projects. A Better City reaffirms the City’s commitment to maximizing co-benefits, including enhanced public access, economic development opportunities, and ecosystem restoration and biodiversity. Additionally, A Better City urges the City to advance needed climate financing and funding opportunities for resilience, through advocacy for the state Mass

Ready Act and other city-level and regional initiatives for resilience funding (see more in the funding and financing section, below).

- **C2:** A Better City supports and appreciates the strategy to advance the design and permitting of capital projects needed to close near-term flood pathways for Boston.
 - A Better City recommends working with the State Department of Environmental Protection, as well as the ResilientMass team, to identify and address resilience permitting backlogs, as well as the needed regulatory reform to help move innovative resilient infrastructure projects forward.

Combating Cross-Hazard Climate Risks

- **X1:** A Better City supports the strategy to expand the City’s climate data network and believes that there are many opportunities for partnership with regional academic and research institutions, hospitals, and healthcare centers to leverage existing data and make them more publicly accessible.
 - A Better City recommends clarifying to what extent cross-hazard climate data will be made publicly available and also recommends ensuring that such data leverage the best available science, as well as promote consistency across jurisdictions (ex. alignment with state-level datasets relevant to ResilientMass). Additionally, A Better City recommends working with local resilience experts in climate-resilient design to identify existing datasets that may be leveraged for climate solutions. Finally, A Better City recommends partnering with local academic institutions to uplift climate data associated with local sensor networks, including but not limited to the [B-COOL project](#), [CATCH](#), [C-HEAT](#), and [Wicked Hot Boston](#), as well as ongoing sensor network efforts at Northeastern University ([Common SENSES](#) project) and MIT (heat sensor work through their Office of Sustainability and the City of Cambridge). Whenever possible, such datasets should emphasize cumulative and compounding risks of multiple climate hazards, like the intersection of extreme heat and poor air quality.
- **X4:** A Better City supports the effort to establish community resilience hubs and recommends prioritizing this strategy as both a near-term and long-term commitment.
 - A Better City recommends exploring opportunities to leverage successful community resilience hub and microgrid models from other jurisdictions, including [New Orleans’ Community Lighthouse Project](#) and Phoenix’s [Maricopa County Heat Relief Network](#).
- **X6:** A Better City would like to be engaged in any update to the Coastal Flood Overlay District (CFROD) to ensure that both community members and coastal property owners in vulnerable areas are engaged and consulted prior to any CFROD updates.
 - A Better City recommends working with the Wharf District Council, Boston Harbor Now, and other coastal resilience community organizations to gain feedback on how to update the CFROD according to best available science as well as community needs. A Better City also recommends clarifying how the stormwater inundation model and CFROD would intersect, as well as how often the City intends to update the CFROD over time.

Workforce Development

- **W1:** A Better City supports the strategy to expand the Boston Climate Jobs Alliance (BCJA), as pre-apprenticeship programs like those within PowerCorps Boston building operations tract have proven to be successful for both trainees and large buildings.
 - Whenever possible, A Better City recommends emphasizing and scaling up opportunities for train-to-hire programs (beyond the traditional internship program).
- **W3:** A Better City supports the continuation of PowerCorpsBOS as an integral job pathway into the decarbonization of large existing buildings, as it has proven to be vital to both interested trainees as well as buildings needing to reduce emissions.

- A Better City appreciates and supports the efforts to provide train-to-hire opportunities for PowerCorps trainees across all tracts, including both urban forestry and green infrastructure, as well as building operations.

Funding & Financing

General Comments: A Better City recommends clarifying how an accelerator fund for climate solutions would be complementary to, and not duplicative of, existing funding structures like the BERDO Equitable Emissions Investment Fund, the state-level Massachusetts Community Climate Bank, and ongoing efforts to pass state legislation for climate resilience funding. It will be important to find opportunities for financing (ex. low or no-cost loans) in addition to funding, to help minimize barriers to implementation. Finally, investment in climate solutions should strive to promote co-benefits across climate mitigation, resilience, and climate justice whenever possible.

- **F1:** A Better City supports the strategy to leverage public-private partnerships (PPPs) for climate action.
 - A Better City recommends clarifying what kinds of public-private partnerships for climate action have been successful in other jurisdictions, and what types of partnerships that Boston would be interested in pursuing. Additionally, it would be helpful to clarify how the City may incentivize PPPs.
- **F4:** A Better City supports the consideration of an accelerator fund for climate solutions.