Joint Comments on CECP 2030 Plan: Version 2, 2.4.21

[Insert seal from each community; intent is to feature the seal of each community that signs on]

February 19, 2021

Kathleen Theoharides

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs
100 Cambridge St., Suite 900
Boston, MA 02114

RE: Joint Comments from Municipalities regarding the Interim Clean Energy and Climate Plan for 2030

Dear Secretary Theoharides,

The Cities of [X, Y and Z] and the Towns of [X, Y and Z] ("Communities") are pleased to respond to the Interim Clean Energy and Climate Plan for 2030 ("2030 CECP").

Our Communities have grave concerns regarding the impact climate change will have on the Commonwealth, the United States, and the world, and we have each made strong commitments to reducing greenhouse gas emissions. We appreciate the thoughtful analysis the Executive Office of Energy and Environmental Affairs (EEA) has conducted to understand the complex scientific, technological and economic impact for various roadmaps.

As we work with you to advance our shared focus on climate mitigation, our Communities are struggling to answer the same question the EEA posed in the 2050 Decarbonization Roadmap Study:

How can we achieve Net Zero while maintaining a healthy, equitable, and thriving economy?

The release of the 2050 Decarbonization Roadmap Study and the 2030 CECP, which provides a rich and diverse collection of strategic state actions cities and towns can use to build local implementation plans, is an important first step, and we agree with the plan's overall approach to reducing emissions. Specifically, we agree with the bold actions, such as pressing BBRS to quickly implement a 2050-compliant building code, establishing 2035 as the end of sales of fossil fuel vehicles and taking actions that would change the goals and priorities of Mass Save and the Department of Public Utilities so as to align with our climate goals.

To further enhance the Commonwealth's plan, we provide the following specific requests from the viewpoint of municipalities who are endeavoring to do our part in achieving Massachusetts' climate goals and to model leading municipal actions within the state and nationally:

1. **Establish a Municipal Version of the GWSA Implementation Advisory Committee**

   The Interim CEC Plan states that, "It will take action at all levels of government…" and "…continued action by local government across the Commonwealth is required." The Communities agree with this statement and encourage the Commonwealth to formally engage municipalities in the Plan's implementation. We recommend establishing a Municipal version of the GWSA Implementation Advisory Committee to provide an ongoing bridge for communications between state and local government. The

Committee should be designed to reflect the diverse nature and needs of municipalities based on size, location and economic structure.

2. Increase Funding for Municipal Climate Action

The Communities encourage the Commonwealth to realize that, because work is needed at all levels of government, so too are new funds needed at all levels. Without this local support, which the 2030 CECP describes as "required", local actions will be delayed, sporadic or in too many cases not available at all.

Local funding should be prioritized for regional collaboration which leads to greater efficiency and uniformity among neighboring municipalities. These resources are needed at three levels. First, the Commonwealth should provide support at the community level such as funding for sustainability coordinators for program administration as well as funding for community-wide coaching to guide an equitable transition to 2050-compliant technology for all stakeholders. Second, municipalities need experts who can serve as resources in clean energy and sustainability technologies who can be available regionally to define and share best practices among cities and towns and ultimately to negotiate better deals with vendors. Third, it is crucial that municipalities are included in the improvements and expansions made to grant, rebate, and incentive programs (including renewable energy incentive programs) that will help them lead by example. Funding to facilitate, implement, maintain, and operate clean energy and electrification technologies such as EV charging station networks and clean heating equipment will be crucial to accelerating municipalities' progress to net zero.

3. Update the Building Code with a High-Performance Stretch Energy Code

The 2030 CECP correctly identifies the importance of moving quickly to a "new, high-performance stretch energy code requiring passive-house level building envelope efficiency." In doing so, the 2030 CECP outlines a plan to "present a new high-performance stretch energy code to the Board of Building Regulations and Standards (BBRS) in 2021 that allows for Green Communities to opt in starting in 2022 and that it will become mandatory and effective statewide no later than January 1, 2028."

The Communities – all of which have been designated as Green Communities – support the development of a new high-performance stretch energy code and the rapid, orderly transition to this code. To encourage early adoption by Green Communities, we recommend a pool of grant money be made available exclusively to Green Communities who adopt the high performance energy stretch code prior to 2028. This would accelerate adoption of 2050-compliant technology statewide, and this incentive would provide motivation for existing Green Communities to move quickly toward the goal we share.

The Communities also seek to remind DOER how challenging it can be to adopt a new code as a general ordinance via City Council or as a bylaw through a vote of Town Meeting. Creating a mechanism for Green Communities to avoid this local legislative burden as part of the opt in process would further increase the speed of widespread code adoption. Indeed, in debating and voting to support the existing stretch energy code, Green Communities have already agreed to adopt "any future editions, amendments or modifications thereto" established through the BBRS update process. As such, the Communities ask the Commonwealth to update the 2030 CECP to clarify the process Green Communities must take to adopt the proposed high-performance stretch code, and request a provision that gives the chief municipal executive in a Green Community the authority to opt in.

The Communities welcome partnering with the DOER to further discuss these requests.

4. Align Funding for Public Buildings with Net Zero Goals

The 2030 CECP acknowledges the importance of "avoiding new infrastructure or construction that is based on fossil-fuels for heating which would not be 2050 compliant, as well as ensuring that new equipment and products within buildings are on the path towards 2050 compliance." However, one of the largest funders of new public buildings, the Massachusetts School Building Authority (MSBA), does not currently require

districts to seriously consider 2050 goals in the design and construction of new or renovated school buildings.

At present, the MSBA provides two additional reimbursement points to projects that exceed the Massachusetts Energy base code by 20%. While this is a step in the right direction, it does not go far enough. School districts across the state, including Acton-Boxborough, Arlington, Belmont, Brookline, Cambridge, Lexington, Watertown, Wellesley, and Westborough are demonstrating that fully electric, net zero ready schools – and other building types – are possible and that they do not present a significant financial burden to taxpayers. The Communities urge the EEA to require all new public buildings that are funded by the Commonwealth to be net zero starting in 2022 and to direct additional funding through such avenues to support the implementation of innovative clean energy and sustainability solutions in their construction.

5. **Prioritize Public Transit in Transportation Emission Reduction Strategies**

While the Communities applaud the plan's focus on the "near-term, widespread electrification of the majority of the Commonwealth's vehicles", the absence of a clear strategy to improve and expand public transit is worrisome.

The only mention of public transit in the 2030 CECP is in relation to the Transportation and Climate Initiative Program (TCI-P), which "will also help support investments that will make it easier to get around without a car, such as improved public transportation". This singular reference to public transit reflects an inadequate level of attention to a resource that is critical to maximizing the effectiveness of smart growth policies in our Communities and across the Commonwealth and is equally necessary in advancing equity in the transition to net zero. The Communities ask the EEA to re-evaluate the role of public transit in achieving the state's 2030 emissions reduction goal and, at a minimum, to provide further detail on how TCI-P funding will be used to improve public transportation.

6. **Provide Resources to Accelerate Electrification Locally**

While municipal governments have limited expertise in emerging technologies like electric vehicles and heat pumps, we have unique insight into our communities and the concerns of local property owners who will be making decisions on the adoption of carbon-free technologies. As municipalities, we are eager to support early adopters and normalize these technologies, similar to the experience many communities have had participating in the Massachusetts Clean Energy Center's Solarize and HeatSmart programs.

As MassCEC transitions from supporting community-level technology campaigns, we ask the state to provide municipalities with training, engineering services, technical support, web-based resources, procurement tools, implementation services and more to educate and engage with our residents and business owners about electrification opportunities.

7. **Increase Access to Emissions Data**

Local data supports local decisions, and provides feedback on progress. At present, state agencies and public utilities capture data about emissions-related activities occurring in local communities, but do not maintain or share the data in a timely manner that allows communities to assess needs, affirm actions or allow for adjustments.

The Communities ask the Commonwealth for increased access to emissions-related data that impact our cities and towns. This includes the number of electric and battery electric vehicles registered in our communities, the number of kilowatt-hours generated by solar panels located in our communities, the number of heat pumps installed in our communities, the number of properties that have participated in MassSave by Census blocks and the types of energy efficiency improvements taken, and more.

A step in the right direction is the Metropolitan Area Planning Council's (MAPC) new tool for measuring community-wide greenhouse gas emissions, which was funded by an EEA grant. This tool allows any Massachusetts community to estimate its community-wide emissions without the added cost of hiring a consultant. It is a tremendously valuable start, but even it is handicapped by stale data – most notably the 2014 Massachusetts vehicle census, which – more than five years later, remains the most recent valid vehicle census available from the state.

The Communities also believe the Massachusetts Legislature plays an essential role in conveying the voice of citizens as well as providing funding and legal mandate to the goals and path forward for the Commonwealth. There are many valuable elements of the climate legislation currently being considered in the Statehouse, and the Communities urge the Baker Administration to act quickly on this and to seek a compromise to ensure a climate bill is passed early in 2021, which will ensure the 2030 CECP has the full support of the state government.

We are proud to be part of Massachusetts's effort to achieve net zero by 2050 and look forward to collaborating with you to realize our shared goal.

Thank you for your commitment to the climate.

Sincerely,

[NAME OF CITY/TOWN AND 1-2 SIGNATORIES PER MUNICIPALITY TO BE ADDED IN ALPHABETICAL ORDER]