

April 10, 2020

Secretary Kathleen Theoharides
Executive Office of Energy and Environmental Affairs
Saltonstall Building
100 Cambridge Street #900
Boston, MA 02114

RE: Determination of Statewide Emissions Limit for 2050

Dear Secretary Theoharides,

The undersigned members of the Global Warming Solutions Project (GWSP)¹ and the Alliance for Clean Energy Solutions (ACES)² appreciate the opportunity to submit comments on the Commonwealth's *Determination of Statewide Emissions Limit for 2050 – "Net-Zero Determination."*

We commend the Baker administration for updating Massachusetts' 2050 emissions limit to net-zero under the GWSA. We support a science-based approach and recommend that the Commonwealth continue to update climate targets to reflect the most up-to-date scientific consensus on what must be done to avoid the worst impacts of climate change.

The severe disruptions and harm to public health and the economy from COVID-19, which particulate pollution aggravates³, demonstrate the heightened need to take action to avert further damage from the climate crisis. Those most vulnerable to the pandemic due to underlying health issues, less social network support, and the inability to endure economic hardship will also be most vulnerable to impacts from climate change. Increasingly and in the long term, climate change will have severe consequences and pose a grave threat to our health, our infrastructure, our economy, and the environment.

We are encouraged that the Commonwealth and its residents are taking urgent, decisive action to save lives and minimize the impact of COVID-19. Climate change is an existential threat that requires similarly urgent action to avert its most severe consequences.

We strongly support a 2050 net-zero requirement, including actual emissions reductions of at least 90% from 1990 levels. We urge the Commonwealth to provide targets for all sectors (transportation, electricity, buildings, non-energy emissions, land use, and natural climate solutions), specify equitable policies that will be needed to attain net-zero emissions, and implement safeguards to ensure we are truly getting to net-zero. Furthermore, we recommend an interim emissions reduction for 2030 of not less than 50% below 1990 levels, and we believe that a more aggressive 2030 target is justified, given

¹ GWSP is a network of advocacy organizations coordinated by the Environmental League of Massachusetts. The GWSP works to ensure the Commonwealth achieves its long-term commitments to reduce greenhouse gas (GHG) emissions as required by the Global Warming Solutions Act (GWSA).

² ACES is a "coalition of coalitions" composed of business groups, clean energy companies, environmental organizations, labor, health, transportation, and consumer advocates dedicated to advancing clean energy for Massachusetts. ACES is committed to ensuring that those charged with shaping Massachusetts' energy policies have the most rigorous, current data on the benefits and costs of clean energy.

³ Xiao Wu and Rachel C. Nethery, "Exposure to air pollution and COVID-19 mortality in the United States," *Harvard T.H. Chan School of Public Health*. April 5, 2020, <https://projects.iq.harvard.edu/covid-pm>

the current scientific consensus. This 2030 emissions limit must be economy-wide to ensure that all sectors are making appropriate progress toward the 2050 net-zero limit.

Bold, equitable policies and implementation pathways for GHG mitigation will be needed to meet the 2030 and 2050 emissions limits, as well as a future 2040 limit. Strong policies should be outlined for each sector, with specific recommendations and outcomes. Moreover, equity and social justice should be considered throughout all parts of the process. Equity considerations should be modeled and be part of cost-benefit analyses, as well as health co-benefits.

We support the policy recommendations produced by the GWSA Implementation Advisory Committee (IAC). The modeling done for the net-zero determination should include all such policies to determine if additional actions are needed to reach the 2030 target. If the IAC's recommended policies to date are not sufficient to reach the targets for 2030 and 2050, then new, just, and strengthened policies must be added. The following policies are particularly integral to reaching our GWSA goals: deep energy efficiency building retrofits, transitioning to 100% clean energy generation with a rapid and responsible build-out of the Commonwealth's untapped offshore wind potential, a strong Transportation and Climate Initiative (TCI), electric vehicle investments, and expanded carbon pricing. Carbon pricing should be considered and modeled economy-wide as well as for the building and transportation sectors.

Consistent with Executive Order 569, all policies related to climate change should be complementary and not at cross-purposes for mitigation, adaptation, and resiliency. Policies should be integrated and connected in a holistic framework, and support cross-cutting environmental quality efforts. In order to achieve deep decarbonization, there must be coordination at every level and across state government agencies, regional agencies and municipalities.

Dedicated and robust investment in these solutions must be a priority—the cost of inaction on climate change is too great. Strong policies will help us avoid such costs and will also bring multiple benefits such as improved public health outcomes, new jobs and industries, and natural resource protection. We also urge the Commonwealth to use a holistic view of costs when conducting cost-benefit analyses, addressing externalities to the extent possible.

Thank you for the opportunity to comment on the Commonwealth's net-zero determination. Public engagement, input, and feedback are of utmost importance. The world and the economy have changed drastically since the release of the net-zero determination, and the climate crisis remains. The disruptions and damages we are seeing as a result of this public health crisis demonstrate the need for decisive and urgent action to prevent the most catastrophic impacts of climate change. We encourage the Commonwealth to be far-reaching in its establishment of updated emissions limits. We look forward to continued engagement from the Commonwealth on how best to reach our shared goals.

Sincerely,

Susannah Hatch, Clean Energy Coalition Director – **Environmental League of Massachusetts**

Deborah Donovan, Massachusetts Director & Senior Policy Advocate – **Acadia Center**

Heather Clish, Senior Director Conservation & Recreation Policy – **Appalachian Mountain Club**

Marc Breslow, Ph.D, Policy & Research Director – **Climate XChange**

Caitlin Peale Sloan, Senior Attorney – **Conservation Law Foundation**

Bill Ravanese, Senior Director of Health Care Green Building & Energy – **Health Care Without Harm**

Jack Clarke, Director of Public Policy & Government Relations – **Mass Audubon**

Rebecca Davis, Deputy Director – **Metropolitan Area Planning Council**

Sarah Simon, Director – **Environmental Entrepreneurs, New England Chapter**

Eugenia Gibbons, Policy Director – **Green Energy Consumers Alliance**

Curtis Fisher, Northeast Regional Executive Director – **National Wildlife Federation**

Paula Garcia, Bilingual Energy Analyst, Climate & Energy Program – **Union of Concerned Scientists**

Stephan Roundtree, Northeast Director – **Vote Solar**