Completion time	4/13/22 19:52:43
First and Last Name	Eva Robenek
Affiliation type	Citizens or citizens groups;
Affiliation name (if any)	
Comment on proposed economy-wide emissions limits for 2025 and 2030	I do not agree with all this proposal, specially I do not agree with changing all the cars over to electric cars in MA , also do not agree with Uber and all the other transportation companies in MA being pushed to have to change all their fleet in to electric.
Comment on proposed sector-specific emissions sublimits for 2025 and 2030 and policies to achieve those sublimits (check one or more)	Transportation sector;
Comment on proposed sector-specific emissions sublimits for 2025 and 2030 and policies to achieve those sublimits	Do not agree with changing cars by 2030 to all electric.
Comment on proposed goals for natural and working lands for 2025 and 2030 and policies to achieve those goals	Do not agree with these proposals.

Completion time	4/14/22 9:29:27
First and Last Name	Dianne Plantamura
Affiliation type	Citizens or citizens groups;
Affiliation name (if any)	
Comment on proposed economy-wide emissions limits for 2025 and 2030	• DOER's proposal to amend the RPS rules to allow biomass power plants to qualify as renewable energy is not addressed in the slide presentation and is inconsistent with Massachusetts' climate law, which requires 50% greenhouse gas emissions reductions economywide by 2030 (70% in the electricity sector). Burning wood is burning carbon, an obvious particulate emission polluter to our communities. Biomass has no place in clean energy.
Comment on proposed sector-specific emissions sublimits for 2025 and 2030 and policies to achieve those sublimits (check one or more)	Electric Power sector;
Comment on proposed sector-specific emissions sublimits for 2025 and 2030 and policies to achieve those sublimits	• Massachusetts must eliminate clean energy subsidies for commercial and residential wood heating, which generates GHG emissions and an outsized proportion of the state's particulate matter (PM) emissions, a major public health concern. Electric power must be achieved from non polluting sources. Biomass has no place in this. Burning wood is NOT clean energy.
Comment on proposed goals for natural and working lands for 2025 and 2030 and policies to achieve those goals	• Massachusetts must adopt and implement real protections for forests and wetlands, to provide carbon sequestration, habitat protection, and other ecosystem functions, not the weak goal language in the slide presentation (e.g. "no net loss"; protecting forests from "conversion" but not logging and clearcutting).

Completion time	4/14/22 14:18:38
First and Last Name	Daniel Hazelton
Affiliation type	Private, non-government organizations;
Affiliation name (if any)	Center for Climate Strategies
Comment on proposed economy-wide emissions limits for 2025 and 2030	What cost analysis was performed to establish the least cost planning design metrics for the plan? Has there been specific cost analysis done for each of the actions in each sector, both aggregated sector wide and on an individual basis? Is there an understanding of the estimated cost for specific program actions along with identified sources and uses of funding for implementation?
Comment on proposed sector-specific emissions sublimits for 2025 and 2030 and policies to achieve those sublimits (check one or more)	
Comment on proposed sector-specific emissions sublimits for 2025 and 2030 and policies to achieve those sublimits	
Comment on proposed goals for natural and working lands for 2025 and 2030 and policies to achieve those goals	

Completion time	4/14/22 14:25:30
First and Last Name	Fred Bunger
Affiliation type	Municipal government or regional (in-state) entities;
Affiliation name (if any)	Wellesley Climate Action Committee
Comment on proposed economy-wide emissions limits for 2025 and 2030	
Comment on proposed sector-specific emissions sublimits for 2025 and 2030 and policies to achieve those sublimits (check one or more)	Buildings sector;
Comment on proposed sector-specific emissions sublimits for 2025 and 2030 and policies to achieve those sublimits	Testimony for DOER CECP Public Hearing 1PM April 14th, 2022My name is Fred Bunger. I am a member of the Town of Wellesley Climate Action Committee Building Working Group.Wellesley has achieved a 25% reduction in greenhouse gas emissions(GHG) from 2007 thru 2021. At 2021 Town Meeting, Wellesley adopted GHG reduction goals of 50% in 2030, 75% in 2040 and net zero emissions by 2050. A Climate Action Plan(CAP), issued in February, provides a roadmap for meeting those climate goals. Buildings are 61% of Wellesley's total emissions. Substantial reduction of energy use and emissions from buildings, both new and existing is critical to meeting the goals. Energy Use Intensity (EUI) is used to measure building energy efficiency in the CAP. Current residential average EUI is 65 kBTU/sq.ft/yr.. Current commercial/institutional average EUI is 104 kBTU/Sq.ft./yr.. The CAP establishes targets of 30 EUI average for residential units 40 EUI average for commercial & institutional buildings. These building energy efficiency targets coupled with electrification and supply of 100% renewable energy will meet the net zero emissions goal.We cannot meet the building energy efficiency targets and GHG emissions goals through local actions alone. We need the full support of the State for:1. A true net zero emission Stretch Energy Code so that new construction is energy efficient and does not permit fossil fuel use.2. Requiring annual energy use disclosure on property transfers now.3. Establish a State building energy disclosure and energy efficiency improvement program requiring both EUI and carbon intensity per square foot criteria by building type. Wellesley is promoting a voluntary Building Energy and Tracking program in anticipation of eventual State statutes.4. Improve incentives for both building envelope improvements and electrification through MassSave and provide support to municipal light plant communities.5. Support at least a 30% reduction in energy use from current stretch code if not adoption of Passive House standards in order to meet Wellesley energy use intensity targets.6. Wellesley has 234 units of state-owned subsidized housing that are sorely in need of deep energy retrofits and electrification. To meet our goals, state funding needs to be available to pay for building envelope improvements and conversion of fossil fuel equipment to electrical. State funding here would address a key environmental justice issue. Today's buildings will be tomorrow's problems if the State does not encourage maximum energy efficiency and minimum emissions from new and existing buildingsThank you for your consideration and for allowing me to speak at this public forum. Fred BungerWellesley Climate Action Committee Building Working Group Leader

Comment on proposed goals for natural and working lands for 2025 and 2030 and policies to achieve those goals	

Completion time	4/14/22 14:48:06
First and Last Name	Robert Cherdack
Affiliation type	Citizens or citizens groups;
Affiliation name (if any)	Appalachian Mountain Club
Comment on proposed economy-wide emissions limits for 2025 and 2030	If the goal is for 20% of forest products to be durable what are the rest. If the rest goes for fuel and short term uses, shouldn't they be drastically reduced in any greenhouse gas reduction plan.
Comment on proposed sector-specific emissions sublimits for 2025 and 2030 and policies to achieve those sublimits (check one or more)	Electric Power sector;
Comment on proposed sector-specific emissions sublimits for 2025 and 2030 and policies to achieve those sublimits	Re: the 8 GW of solar power you cited is that peak power or average power which is only about 15% of peak?
Comment on proposed goals for natural and working lands for 2025 and 2030 and policies to achieve those goals	Natural forest lands are our best and most available solution to reduction of CO2 in the air. More acres of forest will reduce CO2, cool local microclimates, and provide all the other benefits we know forest bring. Acquiring AND preserving forests are our cheapest and most beneficial method to reduce greenhouse gasses.

Completion time	4/25/22 13:21:17
First and Last Name	Brian Campbell
Affiliation type	Citizens or citizens groups;
Affiliation name (if any)	Private Citizen, Engineer BSEE UML 1991 & American Nuclear Society Member
Comment on proposed economy-wide emissions limits for 2025 and 2030	My name is BRIAN CAMPBELL and I live in CHELMSFORD, and I am strongly OPPOSED to 2025 and 2030 CECP – Clean Energy and Climate Plan, as it DOES NOT support, "war footing – an emergency", bottom-line, Massachusetts needs to support MORE ENERGY PRODUCTION and LNG EXPORTS TO EUROPE 2022! New England needs to expand Pipeline Capacity and KEEP OLD and BUILD NEW NUCLEAR POWER capacity by Expanding CES-E – Clean Energy Standard (Existing) & CES – Clean Energy Standard! Nuclear Power Provides 3400 MW to the ISO-NE GRID, of a 14000 MW average load, yet this blatant Anti-Nuclear CECP mentions "nuclear", ONCE on Page #40 and Solar 42 times. "We are on a war footing – an emergency," Energy Secretary Jennifer Granholm declared at the CERA energy conference in March 9, 2022, Houston, TX, "We have to responsibly increase short-term supply where we can right now to stabilize the market and to minimize harm to American families." Addressing oil executives in the audience, Granholm told them: "I hope your investors are saying these words to you as well: In this moment of crisis, we need more supply right now, we need oil and gas production to rise to meet current demand." https://www.energy.gov/articles/secretary-granholm-ceraweek-keynote-luncheon-and-11-fireside-chat-sp-globals-dan-yergin ISO New England can meet winter power demand 'if the weather is mild,' grid operator warns. Gordon van Welie CEO ISO New England can meet winter power demand 'if the weather is mild,' grid operator warns, But it also warned that this winter more than 3,700 MW of gas-fired generation resources are "at risk of being unable to get fuel when needed." 3,700 MW = PREmature Closed, VT Yankee + Pilgrim NUCLEAR + Brayton Point COAL. So Let's build more pipeline capacity to ensure reliable e-power because we New Englanders LOVE paying #3 HIGHEST $$$ ERATE in usa and HATE Reliable NUCLEAR POWER? 2025 and 2030 CECP – Clean Energy and Climate Plan will Raise these already high energy prices, higher with more emissions, and less reliable electricity, leading to rolling blackouts. >>https://www.masslive.com/news/2021/07/massachusetts-ranked-3rd-most-energy-expensive-state-new-england-states-all-make-the-top-15.html From CECP-"2020s include a balanced clean energy portfolio anchored by significant offshore wind resources, more interstate transmission, widespread electrification of transportation and building heat, and reducing costs by taking action at the point of replacement for equipment, infrastructure, and systems that use fossil fuels". A portfolio anchored by significant offshore wind resources, WILL require significant amounts of new Gas peaker electrical generation to backup unreliable offshore wind resources. BONUS>>Offshore Wind Plans Will Drive Up Electricity Prices And Require 'Massive Industrialization Of The Oceans' From CECP-"Massachusetts, even with maximal rooftop deployment far in excess of historic levels, that will require the installation of ground-mounted

	solar on approximately 60,000 acres of land in Massachusetts over the next thirty years." 60,000 acres of land in Massachusetts, is a large land footprint in a small state. Solar panels are subsidized by ITC for installing Cheap, because of, Uyghur slave labor from Xinjiang China, Solar Panels. Significant amounts of new Gas peaker electrical generation to backup unreliable Solar Panels & WIND. When Clean Energy Is Powered by Dirty Labor. Most solar panels come from China, and using them to fuel a clean energy transition risks reliance on Uyghur slave labor in Xinjiang. As CECP promotes more unreliable Renewable Energy, more "Celebrations" of NEW GAS electrical generation will be necessary. "State Representative Randy Hunt (R-Sandwich) said "It's ironic that we have to build a fossil fuel plant to make our renewable energy grid more robust," he said. The new unit helps to fill the gaps in those systems and has become even more vital as the Plymouth nuclear plant has been CLOSED.
Comment on proposed sector-specific emissions sublimits for 2025 and 2030 and policies to achieve those sublimits (check one or more)	Electric Power sector;Transportation sector;
Comment on proposed sector-specific emissions sublimits for 2025 and 2030 and policies to achieve those sublimits	MORE NUCLEAR POWER NEEDED!
Comment on proposed goals for natural and working lands for 2025 and 2030 and policies to achieve those goals	1 OPPOSED to 60,000 Acres of NEW Industries Solar PANELS is a large land footprint in a small state. Solar panels are subsidized by ITC and Cheap, because of, Uyghur slave labor from Xinjiang China, Solar Panels2 OPPOSED to Massachusetts Offshore Wind Plans THAT Will Drive Up Electricity Prices And Require 'Massive Industrialization Of The Oceans, Kill Seabirds and endanger threatened Right Whale with extinction .

Completion time	4/28/22 23:08:32
First and Last Name	Kathleen Vandiver
Affiliation type	MIT Center for Environmental Health Sciences (NIEHS) Govt Funding ;
Affiliation name (if any)	MIT Center for Environmental Health Sciences (NIEHS) Govt Funding
Comment on proposed economy-wide emissions limits for 2025 and 2030	
Comment on proposed sector-specific emissions sublimits for 2025 and 2030 and policies to achieve those sublimits (check one or more)	Electric Power sector;
Comment on proposed sector-specific emissions sublimits for 2025 and 2030 and policies to achieve those sublimits	Hydroelectric power generated by construction of dams in rivers has be very detrimental to our nation's river ecosystems. Th recent dam removals in states like Massachusetts and Maine, have just begun to help fish populations rebound with the river herring migrating upstream to spawn. Their increasing numbers are helping our oceans recover from over-fishing, and provide sustenance for Indigenous people and for diverse wildlife living in these riparian environments. Please allow our rivers to run free and restore our rivers' life. To the point: -- Strike hydropower from the list of sustainable energy sources. -- Dams should continue to be REMOVED from rivers. -- Focus on generating electrical power in other ways that are ecologically cleaner.
Comment on proposed goals for natural and working lands for 2025 and 2030 and policies to achieve those goals	Earlier in my career, I taught sixth grade science and the children in my classes loved their project days being outside doing science, wearing tall boots observing and recording seasonal changes on their assigned wetland plots behind the school. They learned that wetlands can store large amounts of water, Wetlands can clean and restore water quality, and that wetlands make marvelous animal nurseries. Today we would be learning more about additional values of wetland in storing carbon. To the point. : -- REMOVE "streamlined permitting for wetland restoration and development in outer 50 ft. of wetland buffer zone," ALL TOGETHER from the 2030 CECP. Please, this idea should not go forward.

Completion time	4/29/22 7:32:57
First and Last Name	Kate McPherson
Affiliation type	Environmental Nonprofit;
Affiliation name (if any)	Narragansett Bay Riverkeeper
Comment on proposed economy-wide emissions limits for 2025 and 2030	EEA is recommending streamlined permitting for development in outer 50 ft. of wetland buffer zone. It appears this recommendation is intended to protect wetlands by keeping development farther away from the biological wetland, however this appears to backfire by incentivizing development in that outer buffer zone. It is well documented in the scientific community that buffers of AT LEAST 100 feet are required to protect wetlands and waterbodies from phosphorus, nitrogen, and other water quality impairments. Buffers for wildlife quality are significantly wider (over 500 feet) and so any permitted development near wetland resources is acknowledged to be detrimental to many types of wildlife intolerant to human disturbance. Development in the outer 50 feet of buffer zone will have serious impacts to water quality, wildlife habitat, and the wetlands' ability to store carbon and floodwaters. EEA is also recommending increased "clean electricity for Massachusetts customers." As the state ramps up renewables, we must make sure that hydropower is not included as a sustainable energy source. Investing in hydropower would be antithetical to the state's existing dam removal work. Hydropower may seem like a "clean" source of electricity, however impoundments are a serious source of greenhouse gasses. Global warming emissions are produced during the installation and dismantling of hydroelectric power plants, but recent research suggests that emissions during a facility's operation can also be significant. Such emissions vary greatly depending on the size of the reservoir and the nature of the land that was flooded by the reservoir.
Comment on proposed sector-specific emissions sublimits for 2025 and 2030 and policies to achieve those sublimits (check one or more)	Electric Power sector;Transportation sector;Buildings sector;
Comment on proposed sector-specific emissions sublimits for 2025 and 2030 and policies to achieve those sublimits	EEA is also recommending increased "clean electricity for Massachusetts customers." As the state ramps up renewables, we must make sure that hydropower is not included as a sustainable energy source. Investing in hydropower would be antithetical to the state's existing dam removal work. Hydropower may seem like a "clean" source of electricity, however impoundments are a serious source of greenhouse gasses. Global warming emissions are produced during the installation and dismantling of hydroelectric power plants, but recent research suggests that emissions during a facility's operation can also be significant. Such emissions vary greatly depending on the size of the reservoir and the nature of the land that was flooded by the reservoir.

Comment on proposed goals for natural and working lands for 2025 and 2030 and policies to achieve those goals	EEA is recommending streamlined permitting for development in outer 50 ft. of wetland buffer zone. It appears this recommendation is intended to protect wetlands by keeping development farther away from the biological wetland, however this appears to backfire by incentivizing development in that outer buffer zone. It is well documented in the scientific community that buffers of AT LEAST 100 feet are required to protect wetlands and waterbodies from phosphorus, nitrogen, and other water quality impairments. Buffers for wildlife quality are significantly wider (over 500 feet) and so any permitted development near wetland resources is acknowledged to be detrimental to many types of wildlife intolerant to human disturbance. Development in the outer 50 feet of buffer zone will have serious impacts to water quality, wildlife habitat, and the wetlands' ability to store carbon and floodwaters.

Completion time	4/29/22 9:19:39
First and Last Name	Karen Buck-Gilbert
Affiliation type	Citizens or citizens groups;
Affiliation name (if any)	Friends of the Malden River; Malden River Works Waterfront Cl Project
Comment on proposed economy-wide emissions limits for 2025 and 2030	We agree with the reduction rate and hope that by increasing the percentages of reductions that businesses will realize that future reductions are imminent and should be addressed immediately for any mechanical improvements that are within 5 years.
Comment on proposed sector-specific emissions sublimits for 2025 and 2030 and policies to achieve those sublimits (check one or more)	Electric Power sector;Buildings sector;Transportation sector;
Comment on proposed sector-specific emissions sublimits for 2025 and 2030 and policies to achieve those sublimits	We applaud the State's commitment to decarbonizing the electric grid. We must be thoughtful and judicious in our methods. In our urgent transition to renewable energy, though, we must not destroy the natural resources on which our resilience depends. Therefore we oppose hydropower in the Interim 2030 CECP electricity sector goals, and encourage the State to pursue other sources of renewable energy in future CECP updates that do not yield such harmful impacts. Please remove hydropower as a listed source of clean energy in this plan and elsewhere in EEA's work to encourage renewable energy. It has been determined that dams are detrimental to our ecosystems and our waterways. To encourage hydropower as a sustainable energy source is to ignore the science. It is not a natural solution.Hydroelectric generation and transmission is not a green, ethical, or sustainable option. Hydropower dams destroy river ecosystems, release large quantities of carbon and methane from inundated greenspace, impinge on indigenous lifeways, and can impact disadvantaged and environmental justice communities, particularly in rural areas. The Massachusetts Division of Ecological Restoration works to remove dams statewide in order to restore aquatic ecosystems, and has extensive information on their website on the impacts of small dams. Building out new hydropower would be contrary to DER's ongoing work, and waste good investments the state has already made.Massachusetts should oppose development of any new hydroelectric facilities and new transmission of hydroelectricity from outside our borders, in order to oppose the horrendous environmental and social impacts caused by these facilities. That is not a legacy we want for the Commonwealth.

Comment on proposed goals for natural and working lands for 2025 and 2030 and policies to achieve those goals	We appreciate the state prioritizing conservation of our natural and working lands for carbon storage, which yields additional habitat and water quality benefits. However, we strongly oppose "streamlined permitting for wetland restoration and development in outer 50 ft. of wetland buffer zone," and request that it be removed from the 2030 CECP. We struggle with these small margins of protection on the Malden River. So many of our urban rivers have already lost their wetlands to channelization and therefor are not protected or have limited protections against development. We need to restore wetlands and increase their protections. Development increases heat islands and polluted stormwater output. Most of the urban and blighted rivers are in environmental justice communities. Any encouragement to develop in wetland buffer zones is antithetical to the buffer zone's purpose, and will not support wetlands' ability to store carbon, nor their important ecosystem services. Wetland protection is one of the best things the state can do for climate resilience. Wetlands protect communities from flooding, provide excellent wildlife habitat, and according to the Blue Calculator tool in the 2020 Clean Energy and Climate Plan, store thousands of tons of greenhouse gasses. The 2030 CECP updates also recommend restoring more wetlands; encouraging development in their buffer zone is contrary to the State's own stated goals, and will have the unintended consequence of actually incentivizing development in that space. Furthermore, development even in the outer 50 feet of a wetland buffer zone will increase stormwater pollution to the adjacent wetland and beyond. If developers take advantage of streamlined permitting, the state will face increased costs down the line for water quality remediation. On a watershed scale, not just allowing but encouraging such development will yield negative environmental quality, and degrade the wetlands' carbon storage ability.

Completion time	4/29/22 9:49:36
First and Last Name	Katharine Lange
Affiliation type	Private, non-government organizations;
Affiliation name (if any)	Massachusetts Rivers Alliance
Comment on proposed economy-wide emissions limits for 2025 and 2030	Thank you for your urgency in transitioning Massachusetts to a decarbonized reality.
Comment on proposed sector-specific emissions sublimits for 2025 and 2030 and policies to achieve those sublimits (check one or more)	Electric Power sector;
Comment on proposed sector-specific emissions sublimits for 2025 and 2030 and policies to achieve those sublimits	We applaud the State's commitment to decarbonizing the electric grid. In our urgent transition to renewable energy, though, we must not destroy the natural resources on which our resilience depends. Therefore we oppose hydropower in the Interim 2030 CECP electricity sector goals, and encourage the State to pursue other sources of renewable energy in future CECP updates that do not yield such harmful impacts. Please remove hydropower as a listed source of clean energy in this plan and elsewhere in EEA's work to encourage renewable energy. Hydroelectric generation and transmission is not a green, ethical, or sustainable option. Hydropower dams destroy river ecosystems, release large quantities of carbon and methane from inundated greenspace, impinge on indigenous lifeways, and can impact disadvantaged and environmental justice communities, particularly in rural areas. The Massachusetts Division of Ecological Restoration works to remove dams statewide in order to restore aquatic ecosystems, and has extensive information on their website on the impacts of small dams. Building out new hydropower would be contrary to DER's ongoing work, and waste good investments the state has already made.Massachusetts should oppose development of any new hydroelectric facilities and new transmission of hydroelectricity from outside our borders, in order to oppose the horrendous environmental and social impacts caused by these facilities. That is not a legacy we want for the Commonwealth.

Comment on proposed goals for natural and working lands for 2025 and 2030 and policies to achieve those goals	We appreciate the state prioritizing conservation of our natural and working lands for carbon storage, which yields additional habitat and water quality benefits. However, we strongly oppose “streamlined permitting for wetland restoration and development in outer 50 ft. of wetland buffer zone,” and request that it be removed from the 2030 CECP. Any encouragement to develop in wetland buffer zones is antithetical to the buffer zone’s purpose, and will not support wetlands’ ability to store carbon, nor their important ecosystem services. Wetland protection is one of the best things the state can do for climate resilience. Wetlands protect communities from flooding, provide excellent wildlife habitat, and according to the Blue Calculator tool in the 2020 Clean Energy and Climate Plan, store thousands of tons of greenhouse gasses. The 2030 CECP updates also recommend restoring more wetlands; encouraging development in their buffer zone is contrary to the State’s own stated goals, and will have the unintended consequence of actually incentivizing development in that space. Furthermore, development even in the outer 50 feet of a wetland buffer zone will increase stormwater pollution to the adjacent wetland and beyond. If developers take advantage of streamlined permitting, the state will face increased costs down the line for water quality remediation. On a watershed scale, not just allowing but encouraging such development will yield negative environmental quality, and degrade the wetlands’ carbon storage ability.

Completion time	4/29/22 9:54:29
First and Last Name	Kerry Snyder
Affiliation type	Private, non-government organizations;
Affiliation name (if any)	Neponset River Watershed Association
Comment on proposed economy-wide emissions limits for 2025 and 2030	
Comment on proposed sector-specific emissions sublimits for 2025 and 2030 and policies to achieve those sublimits (check one or more)	
	We applaud the State's commitment to decarbonizing the electric grid. In our urgent transition to renewable energy, though, we must not destroy the natural resources on which our resilience depends. Therefore we oppose hydropower in the Interim 2030 CECP electricity sector goals. Instead, we encourage the State to pursue other sources of renewable energy in future CECP updates that do not yield such harmful impacts. Please remove hydropower as a listed source of clean energy in this plan and elsewhere in EEA's work to encourage renewable energy. Hydroelectric generation and transmission is not a green, ethical, or sustainable option. Hydropower dams destroy river ecosystems, release large quantities of carbon and methane from inundated greenspace, impinge on indigenous lifeways, and can impact disadvantaged and environmental justice communities, particularly in rural areas. The Massachusetts Division of Ecological Restoration works to remove dams statewide in order to restore aquatic ecosystems, and has extensive information on their website on the impacts of small dams. Building out new hydropower would be contrary to DER's ongoing work, and waste good investments the state has already made.
Comment on proposed sector-specific emissions sublimits for 2025 and 2030 and policies to achieve those sublimits	Massachusetts should oppose development of any new hydroelectric facilities and new transmission of hydroelectricity from outside our borders, in order to oppose the horrendous environmental and social impacts caused by these facilities. That is not a legacy we want for the Commonwealth.

Comment on proposed goals for natural and working lands for 2025 and 2030 and policies to achieve those goals	We appreciate the state prioritizing conservation of our natural and working lands for carbon storage, which yields additional habitat and water quality benefits. However, we strongly oppose "streamlined permitting for wetland restoration and development in outer 50 ft. of wetland buffer zone," and request that it be removed from the 2030 CECP. Any encouragement to develop in wetland buffer zones is antithetical to the buffer zone's purpose, and will not support wetlands' ability to store carbon, nor their important ecosystem services. Wetland protection is one of the best things the state can do for climate resilience. Wetlands protect communities from flooding, provide excellent wildlife habitat, and according to the Blue Calculator tool in the 2020 Clean Energy and Climate Plan, store thousands of tons of greenhouse gasses. The 2030 CECP updates also recommend restoring more wetlands; encouraging development in their buffer zone is contrary to the State's own stated goals, and will have the unintended consequence of actually incentivizing development in that space. Furthermore, development even in the outer 50 feet of a wetland buffer zone will increase stormwater pollution to the adjacent wetland and beyond. If developers take advantage of streamlined permitting, the state and municipalities will face increased costs down the line for water quality remediation. On a watershed scale, not just allowing but encouraging such development will yield negative environmental quality, and degrade the wetlands' carbon storage ability.

Completion time	4/29/22 11:49:50
First and Last Name	Rachel Chu
Affiliation type	Citizens or citizens groups;
Affiliation name (if any)	Charles River Conservancy
Comment on proposed economy-wide emissions limits for 2025 and 2030	
Comment on proposed sector-specific emissions sublimits for 2025 and 2030 and policies to achieve those sublimits (check one or more)	
Comment on proposed sector-specific emissions sublimits for 2025 and 2030 and policies to achieve those sublimits	
Comment on proposed goals for natural and working lands for 2025 and 2030 and policies to achieve those goals	We strongly oppose “streamlined permitting for wetland restoration and development in outer 50 ft. of wetland buffer zone,” and request that it be removed from the 2030 CECP. We need to protect wetlands as they protect communities from flooding, serve as habitat for local wildlife, and store greenhouse gases. Development even in the outer 50 feet of a wetland buffer zone will increase stormwater pollution to the wetland and beyond, causing the state to incur increased water quality remediation costs.

Completion time	4/29/22 13:10:12
First and Last Name	Don Keeran
Affiliation type	Private, non-government organizations;
Affiliation name (if any)	Association to Preserve Cape Cod
Comment on proposed economy-wide emissions limits for 2025 and 2030	
Comment on proposed sector-specific emissions sublimits for 2025 and 2030 and policies to achieve those sublimits (check one or more)	
Comment on proposed sector-specific emissions sublimits for 2025 and 2030 and policies to achieve those sublimits	
Comment on proposed goals for natural and working lands for 2025 and 2030 and policies to achieve those goals	Founded in 1968, the Association to Preserve Cape Cod (APCC) is the Cape region's leading nonprofit environmental advocacy and education organization, working for the adoption of laws, policies and programs that protect, preserve and restore Cape Cod's natural resources. APCC focuses our efforts on the protection of groundwater, surface water, and wetland resources, preservation of open space, the promotion of responsible, planned growth and the achievement of an environmental ethic.While APCC supports the proposal to streamline permitting for wetland restoration projects in the outer 50 ft. of a wetland buffer zone, we strongly oppose the inclusion of other "development" in the proposal for streamlining permits. Facilitating development projects within any part of the wetland buffer zone does nothing to assist in a wetland storing carbon or helping to build climate resistance. In fact, there is a reasonable assumption that disturbance of a wetland buffer zone would ultimately have a detrimental effect on the functions and benefits of the wetland. This policy proposal at a minimum is misguided and is at odds with the Commonwealth's goal of protecting, restoring and building wetlands to increase ecological services and address our growing climate crisis. If adopted, this policy will do nothing to discourage development within the inner 50 ft. buffer of the wetland; it will only encourage more development than occurs now in the outer 50 ft. wetland buffer by making it easier to do so.APCC strongly urges EEA to amend this policy proposal to only include streamlined permitting for beneficial ecological restoration projects and to eliminate streamlined permitting for other types of development within the outer 50 ft. buffer to wetlands.

Completion time	4/29/22 14:10:33
First and Last Name	Heather Miller
Affiliation type	Private, non-government organizations;
Affiliation name (if any)	Charles River Watershed Association
Comment on proposed economy-wide emissions limits for 2025 and 2030	
Comment on proposed sector-specific emissions sublimits for 2025 and 2030 and policies to achieve those sublimits (check one or more)	
Comment on proposed sector-specific emissions sublimits for 2025 and 2030 and policies to achieve those sublimits	We applaud the State's commitment to decarbonizing the electric grid. In our urgent transition to renewable energy, though, we must not destroy the natural resources on which our resilience depends. Therefore we oppose hydropower in the Interim 2030 CECP electricity sector goals, and encourage the State to pursue other sources of renewable energy in future CECP updates that do not yield such harmful impacts. Please remove hydropower as a listed source of clean energy in this plan and elsewhere in EEA's work to encourage renewable energy. Hydroelectric generation and transmission is not a green, ethical, or sustainable option. Hydropower dams destroy river ecosystems, release large quantities of carbon and methane from inundated greenspace, impinge on indigenous lifeways, and can impact disadvantaged and environmental justice communities, particularly in rural areas. The Massachusetts Division of Ecological Restoration works to remove dams statewide in order to restore aquatic ecosystems, and has extensive information on their website on the impacts of small dams. Building out new hydropower would be contrary to DER's ongoing work, and waste good investments the state has already made.Massachusetts should oppose development of any new hydroelectric facilities and new transmission of hydroelectricity from outside our borders, in order to oppose the horrendous environmental and social impacts caused by these facilities. That is not a legacy we want for the Commonwealth.

Comment on proposed goals for natural and working lands for 2025 and 2030 and policies to achieve those goals	We appreciate the state prioritizing conservation of our natural and working lands for carbon storage, which yields additional habitat and water quality benefits. However, we strongly oppose "streamlined permitting for wetland restoration and development in outer 50 ft. of wetland buffer zone," and request that it be removed from the 2030 CECP. Any encouragement to develop in wetland buffer zones is antithetical to the buffer zone's purpose, and will not support wetlands' ability to store carbon, nor their important ecosystem services. Wetland protection is one of the best things the state can do for climate resilience. Wetlands protect communities from flooding, provide excellent wildlife habitat, and according to the Blue Calculator tool in the 2020 Clean Energy and Climate Plan, store thousands of tons of greenhouse gasses. The 2030 CECP updates also recommend restoring more wetlands; encouraging development in their buffer zone is contrary to the State's own stated goals, and will have the unintended consequence of actually incentivizing development in that space. Furthermore, development even in the outer 50 feet of a wetland buffer zone will increase stormwater pollution to the adjacent wetland and beyond. If developers take advantage of streamlined permitting, the state will face increased costs down the line for water quality remediation. On a watershed scale, not just allowing but encouraging such development will yield negative environmental quality, and degrade the wetlands' carbon storage ability.

Completion time	4/29/22 20:04:17
First and Last Name	Staci Rubin
Affiliation type	Private, non-government organizations;
Affiliation name (if any)	Global Warming Solutions Act Implementation Advisory Committee Climate Justice Working Group
Comment on proposed economy-wide emissions limits for 2025 and 2030	
Comment on proposed sector-specific emissions sublimits for 2025 and 2030 and policies to achieve those sublimits (check one or more)	Electric Power sector;Transportation sector;Buildings sector;Non-Energy and Industrial sectors;
Comment on proposed sector-specific emissions sublimits for 2025 and 2030 and policies to achieve those sublimits	Please see the emailed version of the full comment letter. To summarize: The CECP should prioritize and anchor equity and justice throughout all sections. The CECP must explicitly state a commitment to avoid further harm to populations most vulnerable to and most at risk from climate impacts, pollution, displacement, energy burdens and costs, while prioritizing climate, environmental, energy, and health benefits to such populations. We also encourage the EEA to prioritize analysis of cumulative impacts, while reducing burdens and increasing benefits to EJ populations.The CECP should support a people-centered approach to policy making, program design, and implementation. We recommend language that demonstrates EEA's commitment to language access and stakeholder engagement. The implementation of the CECP should provide for and ensure broad-based stakeholder participation, input, and oversight. The interests of and people from populations most vulnerable to effects of climate change and most at risk of pollution, displacement, energy burden, and cost must be represented and influential in this process.The CECP should prioritize climate investments in EJ populations. An equitable response to climate change cannot be achieved through verbal commitments alone. Dollars must be directed and invested in a way that supports community-led planning and fosters climate-smart building, community resilience, and markedly increased access to clean energy solutions than currently exists for EJ populations and communities most vulnerable to climate change. The CECP should redress harm of long-standing environmental, energy and development policies that have burdened EJ populations and other vulnerable residents. Investments in clean energy and climate measures made to address environmental, health, and energy burdens imposed on EJ populations and other climate vulnerable residents should not induce displacement. Instead, processes should include measures to ensure that communities do not turnover as a result of environmental, energy, housing, and economic improvements tied to CECP implementation. Further, all environmental, energy, and development projects that receive state funding should contribute to making housing within their vicinity more affordable.

Comment on proposed goals for natural and working lands for 2025 and 2030 and policies to achieve those goals	Please see the emailed version of the full comment letter. To summarize: The CECP should prevent removal of healthy trees, especially in places vulnerable to heat island effect. The CECP should include an explicit directive to preserve healthy, mature trees and naturally vegetated areas, especially but not exclusively in the urban environment. Too often, EJ populations are waging campaigns to preserve mature trees, which provide many existing public health benefits against development plans that aim to remove such trees in the name of new housing or safer streets. We recommend adding a specific action to the CECP that agencies should avoid the removal of healthy, mature trees, and mitigate any loss for transportation, development, or energy infrastructure projects. All projects undertaken by the state or receiving state funding or permits should evaluate impacts of tree removal and the ability to retain existing tree cover and add additional carbon sequestration features. The Commonwealth needs to establish a bold goal to plan a specific number of urban and suburban trees by a certain date, with a focus on EJ populations, and along rivers, streams and meadows.Priority locations for tree planting should include public transit bus stops, school bus stops, and school grounds. The action should also include creating a network of shady green spaces in high-density neighborhoods across the Commonwealth using vacant lots, tax title parcels and other areas.Incorporate additional regulatory changes that support wetland protection and promote EJ. Amendments should be made under 310 CMR 10.05 to require the commission to consult with EJ populations before approving development projects. EEA should review and incorporate content from the Blue Carbon Protection Act, a proposed federal bill, which includes language that wetlands provide buffers against storm surges, “especially for communities of color, low-income communities, and Tribal and Indigenous communities.”

Completion time	4/30/22 7:56:14
First and Last Name	Jeff Clark
Affiliation type	Citizens or citizens groups;
Affiliation name (if any)	Western Massachusetts Climate Action Now
Comment on proposed economy-wide emissions limits for 2025 and 2030	The most recent draft of 2025/2030 CECP is frustratingly short on policy details, numerical targets, cost estimates and appropriate funding mechanisms. I hope the final CECP provides clear evidence that the administration has thought through the details and identified funding for the proposed initiatives and provides evidence to support the presumption that the proposed policies will actually achieve their goals. For example, there are a number of policies that require changing residents' behaviors – whether it is changing housing patterns to better mesh with public transportation options, reducing vehicle miles traveled, increasing bike use, reassuring building managers that heat pumps are ready for mass deployment (without fossil backup), convincing owners of forested land to protect, as opposed to develop, their property, etc. Addressing many of these issues will require significant, two-way, community/business engagement and well thought out plans. It will also take bold policies with some muscle behind them. That will be time-consuming and costly. How are you going to provide assurance that you can meet the related targets? Additionally, only partly addressed are the details of how to ensure that important independent or quasi-independent agencies, such as the DPU, ISO-NE, MassSave, Board of Building Regulations and Standards, the Energy Facilities Siting Board, etc. have clear mandates and are willing to engage in cross-agency cooperation to effectively follow through to ensure the success of policies that fall within their purview. Finally, most of the proposed policies are things the state will do: launch programs, increase support, reform a policy, convene this or that. Saying that we will be launching vaguely-identified policies is to say we will start to start to solve the problem. Do we have enough staff and funding for staff to achieve our goals?
Comment on proposed sector-specific emissions sublimits for 2025 and 2030 and policies to achieve those sublimits (check one or more)	Transportation sector;Buildings sector;

Comment on proposed sector-specific emissions sublimits for 2025 and 2030 and policies to achieve those sublimits	For Transportation:- Adequacy of resources and policy solutions: At the moment, the draft CECP has proposals, but few details. What specific policies will do the job? What level of funding (if needed) will be required for success? Where will that come from? What are the obstacles that need to be addressed?- EV adoption: The definition of low-emitting vehicles has included EVs, plug-ins and hybrid vehicles, with vagueness about targets for each. Any numerical targets for EVs need to specify that we are talking about fully electric cars. Any discussion about plug-ins needs to account for typical proportions of fossil fuel and electricity used in such vehicles. Any discussion about hybrids needs to be clear that they should only be a “transition” technology and their sale should be limited with those of fossil-fuel powered vehicles.- Public EV charging stations: The CECP is proposing one public charging station for every 12 EVs. The chance that a charging station will be available when needed or conveniently located seems very small to me. The stumbling blocks for EV adoption are cost, range and access to fast charging. Until vehicle range is improved by manufacturers, the burden will fall on the availability of public charging stations and state rebates to convince residents to get an EV. At the moment, neither rebates nor the number of charging stations will provide enough incentive to get 200,000 EVs on the road by 2025.- Resources: How can the phase-out of the transportation-related fossil fuel industry be managed? What support will exist for displaced workers?For Buildings:- Adequacy of resources and policy solutions: Again, at the moment, the draft CECP has proposals but few details – what specific policies will do the job? What level of funding (if needed) will be required for success? Where will that come from? What are the obstacles that need to be addressed?- Opt-in building code and opt-in building score cards: The current policy needs require a large and rapid transition but we keep settling on opt-in requirements in the building sector. If this is due to home-rule requirements, how can that be changed? Does the state need to work with each town to convince them to adopt strict building codes?- Scope of building codes: Our most serious issues is existing buildings. Currently building codes affect mostly new construction. The purview of building codes needs to be extended to more than just significant renovations, if we are to meet our goals. Finally, what is the hesitancy about requiring non-emitting technologies in new buildings?Electric heating in 500,000 homes (or hybrid systems)? Regulations related to hybrid heating systems need to be carefully considered. What size systems are we talking about? What will ensure the fossil fuel system would not be used as the primary one? Can we ensure that the cost of fuel oil is much larger than that that of the electricity?- Deep Weatherization: We should not be counting percent of housing stock with deep weatherization. That is a meaningless metric in a situation in which very retrofit will be different. We need a metric that provides insight into whether we are getting the emissions reductions we want! We should be measuring success with a metric such as total saved CO2e.- Heat pump adoption: There are many homeowners, who have heard too many stories of heat pumps that have are inadequate. When correctly designed, of course, there are no issues. There needs to be training for HVAC installers to address this.

Comment on proposed goals for natural and working lands for 2025 and 2030 and policies to achieve those goals	- No net loss of forest and farmland: If we want to seriously follow through on the no net loss of forest and farmland goal, we need to put serious muscle behind this. Owners of private land can do almost whatever they want with their private land. The state's population is increasing, adding pressure to development of open land. How, specifically, does the state intend to address this? Just addressing state-owned lands and construction projects will not do it! Just saying there will be no net loss of forest and farmland without serious policy adjustments will not do it!- Clearing land for solar projects vs rooftop solar: The earlier analysis for the state's technology roadmap to address climate change indicated that perhaps half of the PV solar we will need will need to come from undeveloped land (forests). As we are trying to preserve forest land, we need to incentivize solar on rooftops, parking lots, public rights of way, brown fields, etc. in a way that such opportunities are fully developed.- State guidance on development of forest land for PV: Many towns in western MA are struggling with contentious issues related to plans for large scale development of PV on forested lands. Some of those towns have enacted by-laws to limit solar development in forests. Possible income for the town, depletion of the state's only sequestration resource (our forests) and the urgency of developing renewable energy resources get pitted against each other. There is no clarity whether allowing a given project will open the door to destruction of our forests or will not, ultimately, be necessary, if it turns out we might get all we need from rooftops and other open locations. State policies defining just how much solar could be developed in our forests (total MW from forested land before 2030 and no more, for example) would speed the installation of what we need, avoid overbuilding of projects in our forests, and be critical to protecting our forest and farmland.

Completion time	4/30/22 9:20:47
First and Last Name	Stephen Silva
Affiliation type	Citizens or citizens groups;
Affiliation name (if any)	Secretary
Comment on proposed economy-wide emissions limits for 2025 and 2030	The Taunton River Watershed Alliance (TRWA) strongly supports the comments of the Massachusetts Rivers Alliance. We are working hard with Mass Fish and Wildlife, DCR and others to remove dams to improve and restore diadromous fisheries critical to making both watershed and offshore fisheries resilient to climate change. Hydropower is a step backwards that does more damage than good. Sadly we are already seeing too much development in wetland and stream buffer zones. The proposal as Mass Rivers Alliance points out carved out another opportunity for buffer zone destruction.
Comment on proposed sector-specific emissions sublimits for 2025 and 2030 and policies to achieve those sublimits (check one or more)	
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Comment on proposed goals for natural and working lands for 2025 and 2030 and policies to achieve those goals	

Completion time	4/30/22 16:20:53
First and Last Name	Jacqueline Royce, PhD
Affiliation type	Citizens or citizens groups;
Affiliation name (if any)	Muddy Water Initiative
Comment on proposed economy-wide emissions limits for 2025 and 2030	We are opposed to hydropower's inclussion as a sustainable energy source. Investing in hydropowere would be antithetical to the state's existing dam removal work. as suggested byu Union of Concerned Scientists
Comment on proposed sector-specific emissions sublimits for 2025 and 2030 and policies to achieve those sublimits (check one or more)	
Comment on proposed sector-specific emissions sublimits for 2025 and 2030 and policies to achieve those sublimits	I am opposed to hydropower's inclusion as a sustainable energy source. Investing in hydropower would be antithetical to the state's existing dam removal work as stated by Union of Concerned Scientists and others.
Comment on proposed goals for natural and working lands for 2025 and 2030 and policies to achieve those goals	I am opposed to incentivizing development in 50 ft of wetland buffer zone because such development would have serious impacts on water quality, wildlife habitat, and the wetlands' ability to store carbon and floodwaters.

Completion time	4/30/22 21:02:12
First and Last Name	Priscilla Lynch
Affiliation type	Citizens or citizens groups;
Affiliation name (if any)	
Comment on proposed economy-wide emissions limits for 2025 and 2030	Net zero is not sufficient. We must remove more carbon than we emit.
Comment on proposed sector-specific emissions sublimits for 2025 and 2030 and policies to achieve those sublimits (check one or more)	
Comment on proposed sector-specific emissions sublimits for 2025 and 2030 and policies to achieve those sublimits	
Comment on proposed goals for natural and working lands for 2025 and 2030 and policies to achieve those goals	There is no mention of the social costs of carbon, s is required by the Road-Map 2021. Leave the state forest free of logging. Logging emits huge amounts of carbon, leasing the forests undisturbed stores and sequesters carbon. It's a no brainer. Relying on carbon markets is a loosing proposition. Carbon markets are questionable in their ability to truly address carbon emissions: polluters use the market and keep on polluting. Areas put into the market are areas that would not have been logs anyway.