

Clean Energy and Climate Plan for 2050 Public Comment – Form Submissions

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Completion Time	10/4/22 12:34:23
First and Last Name	Michael Savage
Affiliation Type	Businesses, industries, or trade groups;
Affiliation name (if any)	
Comment on examples of compliance with net zero emissions in 2050.	My comment is specific to the buildings sector. Natural gas can decarbonize. The state needs to have hybrid solutions where different strategies do their best to remove whatever % they are good at. Not one strategy fits all.
Comment on the proposed net emissions accounting approach.	
Comment on proposed sector-specific emissions sublimits for 2050 and strategies and commitments to achieve those sublimits.	Low and negative carbon intensity renewable natural gas (RNG) is available that can be physically delivered to MA. It stands up environmentally (digesters capture methane that would have otherwise vented to the atmosphere and through combustion it is turned to CO2). Carbon capture is available now on the CO2 so it never reaches the atmosphere. It can be reused or permanently injected. These strategies are much more cost effective on a cost per MT of CO2 removed than trying to electrify high temp building process heating like steam. Hospitals, labs/ pharma, colleges and industrial buildings would all benefit while having resiliency and staying competitive.
Comment on proposed goals for natural and working lands for 2050 and strategies and commitments to achieve those goals.	RNG can have custom emission factors. We need to get off the crutch of EPA Portfolio Manager or it needs to evolve. The carbon intensity (CI) score of RNG is verifiable as should be the MA grid. CARB does a good job of this so there is one metric to compare to. I am fine with an emissions cap so long as RNG and carbon capture are allowed for the Buildings sector.

Completion Time	10/12/22 14:30:04
First and Last Name	Steven Roof
Affiliation Type	Academia;Residents or residents groups;Municipal government or regional (in-state) entities;
Affiliation name (if any)	Hampshire College and member of Town of Amherst Energy and Climate Action Committee
Comment on examples of compliance with net zero emissions in 2050.	
Comment on the proposed net emissions accounting approach.	One concern rarely acknowledged is that carbon sequestered in NWLs is not necessarily permanently stored. Carbon even in legislatively protected forests will be released if the trees succumb to pests, disease, and drought. Perhaps this is the cause of the plateau of NWL carbon sequestration rates?
Comment on proposed sector-specific emissions sublimits for 2050 and strategies and commitments to achieve those sublimits.	My comment focuses on the Environmental Justice goals mentioned on slides 11 and 15. The wording on these two slides suggests that EJ goals are focused only on equitable *future* clean energy infrastructure siting. I think we have to emphasize that our current fossil fuel infrastructure highly disproportionately impacts EJ communities across the Commonwealth. A primary EJ goal has to be removing fossil fuel power plants and reducing vehicle pollution from EJ communities.
Comment on proposed goals for natural and working lands for 2050 and strategies and commitments to achieve those goals.	The goals expressed in the NWL section are great. However, we need to understand the past, present, and future threats to NWLs in order to create effective policies. I understand the largest destroyer of NWL has been urban sprawl, at least according the MA Audubon's "Losing Ground" reports. I believe it will be useful for future reports to present and quantify the various threats to NWL and describe how land preservation policies will counter those different threats (that is, different policies will be needed to protect NWL from ground based solar development versus suburban housing and commercial development).

Completion Time	10/17/22 8:20:34
First and Last Name	Bill Shontz
Affiliation Type	Residents or residents groups;
Affiliation name (if any)	best candidate for green
Comment on examples of compliance with net zero emissions in 2050.	cute but ??? so what
Comment on the proposed net emissions accounting approach.	It sounds good but how?
Comment on proposed sector-specific emissions sublimits for 2050 and strategies and commitments to achieve those sublimits.	Planes will be electric? Trucks too? How about Boats and Ships (aircraft carriers, war ships, ammunition manufacturing etc) How by 2050? I'd need to see more about that. I believe you have a plan.
Comment on proposed goals for natural and working lands for 2050 and strategies and commitments to achieve those goals.	I'm afraid it will be too little too late. It is happening now. Better than nothing but not good enough.

Completion Time	10/17/22 8:26:49
First and Last Name	Carina Campobasso
Affiliation Type	Residents or residents groups;
Affiliation name (if any)	
Comment on examples of compliance with net zero emissions in 2050.	<p>Thank you for your thoughtful work on combatting climate change. However, if Massachusetts is to be a true leader in climate policies and is truly serious about averting climate disaster, the Clean Energy and Climate Plan should:</p> <p>Require emissions reductions from large buildings (instead of just energy reporting);</p> <p>Increase the Clean Energy Standard (renewable energy requirement) to 100% by no later than 2035; and</p> <p>Reduce vehicle miles traveled instead of just “stabilizing” them.</p> <p>Thank you, Carina Campobasso Winthrop</p>
Comment on the proposed net emissions accounting approach.	
Comment on proposed sector-specific emissions sublimits for 2050 and strategies and commitments to achieve those sublimits.	
Comment on proposed goals for natural and working lands for 2050 and strategies and commitments to achieve those goals.	

Completion Time	10/17/22 8:31:43
First and Last Name	Karyl Stoia
Affiliation Type	Residents or residents groups;
Affiliation name (if any)	Karyl
Comment on examples of compliance with net zero emissions in 2050.	Why aren't electric car charging stations located along Mass Pike & other major roads like routes 93, 3, 2, 1, etc?? I've had alot of trouble finding the since I bought my Leaf back in 2014.
Comment on the proposed net emissions accounting approach.	
Comment on proposed sector-specific emissions sublimits for 2050 and strategies and commitments to achieve those sublimits.	
Comment on proposed goals for natural and working lands for 2050 and strategies and commitments to achieve those goals.	

Completion Time	10/17/22 8:43:53
First and Last Name	Rosalie Anders
Affiliation Type	Residents or residents groups;
Affiliation name (if any)	Mass Peace Action
Comment on examples of compliance with net zero emissions in 2050.	
Comment on the proposed net emissions accounting approach.	Engineered removal and storage seems fraught with too many long-term problems. I'd like to see a New England-wide nature-based solution--states partnering with each other to ensure that there is
Comment on proposed sector-specific emissions sublimits for 2050 and strategies and commitments to achieve those sublimits.	We need to lobby hard for much more efficient vehicles of all kinds--how about minicabs, for example? And of course, in many areas, smaller and more frequent EV buses.
Comment on proposed goals for natural and working lands for 2050 and strategies and commitments to achieve those goals.	Make this a New England-wide plan, with mutual aid. Figure out how to repurpose suburban sprawl (and how to stop it NOW). Make the forests of Maine and the human resources of Boston, e.g., part of a mutually interdependent human-bio ecosystem. Promote growing food locally through land-use policies and regulations.

Completion Time	10/17/22 10:19:03
First and Last Name	Rebecca Clarke
Affiliation Type	Residents or residents groups;
Affiliation name (if any)	
Comment on examples of compliance with net zero emissions in 2050.	
Comment on the proposed net emissions accounting approach.	
Comment on proposed sector-specific emissions sublimits for 2050 and strategies and commitments to achieve those sublimits.	<ol style="list-style-type: none"> 1. Delineate how much of the 88.6% in expected greenhouse gas emissions reductions by 2050 each suggested strategy or policy is responsible for, to allow for better tracking and course adjustment as needed; 2. Require emissions reductions from large buildings (instead of just energy reporting); 3. Increase the Clean Energy Standard to 100% by no later than 2035; 4. Track pollution levels in addition to clean energy investments in environmental justice communities; 5. Maintain the focus on expanding workforce development; 6. Aim to reduce vehicle miles traveled instead of just “stabilizing” total driving; and, 7. Reconsider the impact of federal developments resulting from the Inflation Reduction Act.
Comment on proposed goals for natural and working lands for 2050 and strategies and commitments to achieve those goals.	

Completion Time	10/17/22 11:14:14
First and Last Name	Ileen Thelen
Affiliation Type	Residents or residents groups;
Affiliation name (if any)	
Comment on examples of compliance with net zero emissions in 2050.	
Comment on the proposed net emissions accounting approach.	
Comment on proposed sector-specific emissions sublimits for 2050 and strategies and commitments to achieve those sublimits.	<p>For the final draft of the 2050 CECP, I encourage the Executive Office of Energy and Environmental Affairs to:</p> <ul style="list-style-type: none"> - Delineate how much of the 88.6% in expected greenhouse gas emissions reductions by 2050 each suggested strategy or policy is responsible for, to allow for better tracking and course adjustment as needed; - Require emissions reductions from large buildings (instead of just energy reporting); - Increase the Clean Energy Standard to 100% by no later than 2035; - Track pollution levels in addition to clean energy investments in environmental justice communities; - Maintain the focus on expanding workforce development; - Aim to reduce vehicle miles traveled instead of just “stabilizing” total driving; <p>and,</p> <ul style="list-style-type: none"> - Reconsider the impact of federal developments resulting from the Inflation Reduction Act. - These changes will result in a stronger, more transparent final CECP for 2050. <p>Thank you for your consideration.</p> <p>Sincerely, Ileen Thelen Newton, MA</p>
Comment on proposed goals for natural and working lands for 2050 and strategies and commitments to achieve those goals.	

Completion Time	10/17/22 13:34:47
First and Last Name	Richard Rosenberry
Affiliation Type	Residents or residents groups;
Affiliation name (if any)	Upper Charles Climate Action
Comment on examples of compliance with net zero emissions in 2050.	We should have 0% carbon emissions by 2050. 28 years is more than enough time to get it right.
Comment on the proposed net emissions accounting approach.	I do not consider biomass to be renewable.
Comment on proposed sector-specific emissions sublimits for 2050 and strategies and commitments to achieve those sublimits.	I find the sub-limits for 2050 to be unsatisfactory. Please keep more CO2 out of the atmosphere.
Comment on proposed goals for natural and working lands for 2050 and strategies and commitments to achieve those goals.	

Completion Time	10/17/22 19:24:47
First and Last Name	Prasannan Parthasarathi
Affiliation Type	Academia;
Affiliation name (if any)	Boston College
Comment on examples of compliance with net zero emissions in 2050.	<p>My name is Prasannan Parthasarathi and I am a resident of Newton, MA. I am writing today to offer comments on the draft Clean Energy and Climate Plan (CECP) for 2050. For the final draft of the 2050 CECP, I encourage the Executive Office of Energy and Environmental Affairs to:</p> <p>Delineate how much of the 88.6% in expected greenhouse gas emissions reductions by 2050 each suggested strategy or policy is responsible for, to allow for better tracking and course adjustment as needed;</p> <p>Require emissions reductions from large buildings (instead of just energy reporting);</p> <p>Increase the Clean Energy Standard to 100% by no later than 2035;</p> <p>Track pollution levels in addition to clean energy investments in environmental justice communities;</p> <p>Maintain the focus on expanding workforce development;</p> <p>Aim to reduce vehicle miles traveled instead of just “stabilizing” total driving; and,</p> <p>Reconsider the impact of federal developments resulting from the Inflation Reduction Act.</p> <p>These changes will result in a stronger, more transparent final CECP for 2050.</p> <p>Thank you for your consideration.</p> <p>Sincerely, Prasannan Parthasarathi Newton, MA</p>
Comment on the proposed net emissions accounting approach.	
Comment on proposed sector-specific emissions sublimits for 2050 and strategies and commitments to achieve those sublimits.	
Comment on proposed goals for natural and working lands for 2050 and strategies and commitments to achieve those goals.	

Completion Time	10/17/22 22:31:33
First and Last Name	Brian Campbell
Affiliation Type	American Nuclear Society MEMBER;
Affiliation name (if any)	
Comment on examples of compliance with net zero emissions in 2050.	The Scale of goals is very expensive and NOT Realistic, and does NOT include NEW NUCLEAR EGEN.
Comment on the proposed net emissions accounting approach.	The Scale of goals is very expensive and NOT Realistic, and does NOT include NEW NUCLEAR EGEN.
Comment on proposed sector-specific emissions sublimits for 2050 and strategies and commitments to achieve those sublimits.	Electrifying everything ? The Scale of goals is very expensive and NOT Realistic, and does NOT include NEW NUCLEAR EGEN.
Comment on proposed goals for natural and working lands for 2050 and strategies and commitments to achieve those goals.	60000 to 12500 acres NEW INDUSTRIAL SLAVE MFG IMPORTED CHINA #1 Solar Panels defeats this goal

Completion Time	10/18/22 10:45:17
First and Last Name	Seana Parker-Dalton
Affiliation Type	Residents or residents groups;
Affiliation name (if any)	Tipping Point 01545
Comment on examples of compliance with net zero emissions in 2050.	<p>My name is Seana Parker-Dalton and I am a resident of Shrewsbury, MA. I am writing today to offer comments on the draft Clean Energy and Climate Plan (CECP) for 2050. For the final draft of the 2050 CECP, I encourage the Executive Office of Energy and Environmental Affairs to:</p> <p>Delineate how much of the 88.6% in expected greenhouse gas emissions reductions by 2050 each suggested strategy or policy is responsible for, to allow for better tracking and course adjustment as needed;</p> <p>Require emissions reductions from large buildings (instead of just energy reporting);</p> <p>Increase the Clean Energy Standard to 100% by no later than 2035;</p> <p>Track pollution levels in addition to clean energy investments in environmental justice communities;</p> <p>Maintain the focus on expanding workforce development;</p> <p>Aim to reduce vehicle miles traveled instead of just “stabilizing” total driving; and,</p> <p>Reconsider the impact of federal developments resulting from the Inflation Reduction Act.</p> <p>These changes will result in a stronger, more transparent final CECP for 2050.</p> <p>Thank you for your consideration.</p> <p>Sincerely, Seana Parker-Dalton Shrewsbury, MA</p>
Comment on the proposed net emissions accounting approach.	
Comment on proposed sector-specific emissions sublimits for 2050 and strategies and commitments to achieve those sublimits.	
Comment on proposed goals for natural and working lands for 2050 and strategies and commitments to achieve those goals.	

Completion Time	10/18/22 19:35:10
First and Last Name	Michael McCord
Affiliation Type	Residents or residents groups;Private, non-government organizations;
Affiliation name (if any)	Gasl Transition Allies (formerly 'Gas Leaks Allies'); Back Bay Green, Boston Clean Energy Coalition
Comment on examples of compliance with net zero emissions in 2050.	<p>I am a resident of Massachusetts and have been so for over 50 years. I am writing today to offer comments on the draft Clean Energy and Climate Plan (CECP) for 2050.</p> <p>I believe that taking transformative action to switch from methane based gas fuels (natural gas, RNG, Biomethane, oil) to clean renewable energy sources (wind, solar, and hydro--including perhaps tidal and wave action) during this decade of the 2020's is absolutely critical to the long term health and sustainability of our Commonwealth, and, indeed, of the World. We do not have a moment to waste. And while the challenges are immense, and the costs similar, we have faced expensive challenges before and we can do so again. There can be no price put on the survival of our civilization, and right now we should be putting 100% of our efforts into achieving that goal.</p> <p>With regard to the current version of the CECP, I support the specific recommendations of the Green Energy Consumer's Alliance which are to encourage the Executive Office of Energy and Environmental Affairs to:</p> <p>Delineate how much of the 88.6% in expected greenhouse gas emissions reductions by 2050 each suggested strategy or policy is responsible for, to allow for better tracking and course adjustment as needed;</p> <p>Require emissions reductions from large buildings (instead of just energy reporting);</p> <p>Increase the Clean Energy Standard to 100% by no later than 2035;</p> <p>Track pollution levels in addition to clean energy investments in environmental justice communities;</p> <p>Maintain the focus on expanding workforce development;</p> <p>Aim to reduce vehicle miles traveled instead of just "stabilizing" total driving; and,</p> <p>Reconsider the impact of federal developments resulting from the Inflation Reduction Act.</p> <p>These changes will result in a stronger, more transparent final CECP for 2050 and I hope the will be embraced by the EOEEA.</p> <p>Thank you for your consideration.</p> <p>And best wishes,</p>

	<p>Michael McCord Boston</p>
<p>Comment on the proposed net emissions accounting approach.</p>	<p>I think you should also include embodied emissions in your calculations as is being proposed by Boston in its draft changes to the Zoning Code. John Dalzell at the BPDA is a marvelous resource on the cogent.</p>
<p>Comment on proposed sector-specific emissions sublimits for 2050 and strategies and commitments to achieve those sublimits.</p>	<p>I defer</p>
<p>Comment on proposed goals for natural and working lands for 2050 and strategies and commitments to achieve those goals.</p>	<p>I haven't reviewed them, but any and all efforts should be made to preserve trees and open land and to direct housing and business development toward existing transportation hubs and underused existing buildings. (Transportation hubs, themselves, need to be expanded with rail service) We should be seeking to both reduce built expansion on existing farmlands, woodlands, semi-wetlands, etc. and to also reduce the need for people to drive long distances instead of taking rail transportation.</p> <p>On privately held lands, any expansion of asphalt or other hard surfaces should be prohibited if there are viable alternatives and some maximum square foot standard for private homes should be established as essential to the reduction of emissions. We have enough gargantuan homes already!</p>

Completion Time	10/19/22 14:42:23
First and Last Name	Michael Kozuch
Affiliation Type	Private, non-government organizations;
Affiliation name (if any)	Earth Day Boston
Comment on examples of compliance with net zero emissions in 2050.	2050 is too far away. We need to rapidly reduce emissions if we are to meet the Paris Climate agreement. Thus we need to delineate how much of the 88.6% in expected greenhouse gas emissions reductions by 2050 each suggested strategy or policy is responsible for, to allow for better tracking and course adjustment as needed.
Comment on the proposed net emissions accounting approach.	
Comment on proposed sector-specific emissions sublimits for 2050 and strategies and commitments to achieve those sublimits.	Require emissions reductions from large buildings (instead of just energy reporting). Track pollution levels in addition to clean energy investments in environmental justice communities; Aim to reduce vehicle miles traveled instead of just “stabilizing” total driving;
Comment on proposed goals for natural and working lands for 2050 and strategies and commitments to achieve those goals.	

Completion Time	10/19/22 15:17:50
First and Last Name	Leslie Zebrowitz
Affiliation Type	Residents or residents groups;
Affiliation name (if any)	Newton EV Task Force
Comment on examples of compliance with net zero emissions in 2050.	
Comment on the proposed net emissions accounting approach.	It is not sufficient to count emissions or sequestration only within MA For example, emissions associated with the production of biofuels and biomass outside of MA should also be counted.
Comment on proposed sector-specific emissions sublimits for 2050 and strategies and commitments to achieve those sublimits.	<p>An Act Creating A Next-Generation Roadmap for Massachusetts Climate Policy, specifies January 1st, 2023 as the deadline for the adoption of the 2050 emissions limits and sub-limits, as well as the release of a comprehensive plan to achieve those limits.</p> <p>What I have learned about the CECP 2050 proposal from public hearings reveals admirable targets for emissions limits. However, I have not found a comprehensive plan to achieve those limits, a plan that must begin to be implemented well in advance if it is to be successful. Below, I raise several questions that need to be addressed. I limit my comments to Transportation which is the sector where I have worked to promote electrification as Co-Chair of the Newton EV Task Force.</p> <p>Transportation New Policy includes</p> <ol style="list-style-type: none"> 1. adding additional policy incentives to retire old combustion vehicles. Questions: In 2023 there will be a \$1000 MOR-EV rebate for turning in a combustion engine vehicle. By how much and when will this incentive be increased? Is there an advantage to starting with a larger incentive that decreases over time in order to motivate people to take this action sooner rather than later? 2. requiring a commitment to smart charging as part of all EV incentives by 2031. Questions: How will smart charging be monitored? The utilities have to be involved. Currently, National Grid’s Charge Smart program offers reduced electrical rates for off -peak charging, but only to a limited number of vehicles. Eversource doesn’t offer this program. What is needed is to mandate the installation of smart electric meters by the utilities, with higher rates charged for all electrical use during peak times, not just for electric vehicle charging. MA is far behind on this -- as early as 2016, nearly half of all U.S. electricity customers had smart meters! https://www.eia.gov/todayinenergy/detail.php?id=34012. <p>Key targets include</p> <ol style="list-style-type: none"> 3. Essentially all passenger vehicles on the road are electric.

	<p>Questions: What about school buses? public buses? trucks? commuter rail? MBTA subways and light rail? These must also be electrified and there is a need to set target dates between 2030 and 2050 for a certain percentage of vehicles of each type to be electric.</p> <p>4. Sufficient EV charging structure in place. Questions: What is 'sufficient'? What policies will be enacted to get owners of existing multi-unit dwellings to install chargers in their parking lots?</p>
<p>Comment on proposed goals for natural and working lands for 2050 and strategies and commitments to achieve those goals.</p>	

Completion Time	10/20/22 17:57:05
First and Last Name	Alexander Hasha
Affiliation Type	Residents or residents groups;
Affiliation name (if any)	Sustainable Milton
Comment on examples of compliance with net zero emissions in 2050.	
Comment on the proposed net emissions accounting approach.	
Comment on proposed sector-specific emissions sublimits for 2050 and strategies and commitments to achieve those sublimits.	<p>My name is Alex Hasha and I am a resident of Milton, MA. I am writing today to offer comments on the draft Clean Energy and Climate Plan (CECP) for 2050. For the final draft of the 2050 CECP, I encourage the Executive Office of Energy and Environmental Affairs to:</p> <p>Delineate how much of the 88.6% in expected greenhouse gas emissions reductions by 2050 each suggested strategy or policy is responsible for, to allow for better tracking and course adjustment as needed;</p> <p>Require emissions reductions from large buildings (instead of just energy reporting);</p> <p>Increase the Clean Energy Standard to 100% by no later than 2035;</p> <p>Track pollution levels in addition to clean energy investments in environmental justice communities;</p> <p>Maintain the focus on expanding workforce development;</p> <p>Aim to reduce vehicle miles traveled instead of just “stabilizing” total driving; and,</p> <p>Reconsider the impact of federal developments resulting from the Inflation Reduction Act.</p> <p>These changes will result in a stronger, more transparent final CECP for 2050.</p> <p>Thank you for your consideration.</p> <p>Sincerely, Alex Hasha Milton, MA</p>
Comment on proposed goals for natural and working lands for 2050 and strategies and commitments to achieve those goals.	

Completion Time	10/21/22 8:43:50
First and Last Name	Susan Starkey
Affiliation Type	Faith Communities;
Affiliation name (if any)	Faith Communities Environmental Network, Cape Cod
Comment on examples of compliance with net zero emissions in 2050.	<p>Re Sequestration: we need policies that inhibit cutting trees/forests to install solar farms. Cape Cod should have over 40% of our land protected given that so much is already protected on the National Seashore.</p> <p>Re Biofuels: they should not be counted as renewable, as deforestation in order to create them is unacceptable, and, using land to grow crops for fuel in an era where we need regenerative agriculture to produce food is also unacceptable.</p>
Comment on the proposed net emissions accounting approach.	Agree
Comment on proposed sector-specific emissions sublimits for 2050 and strategies and commitments to achieve those sublimits.	<p>Caution: the goal of 70% sublimits by 2030 that leads us to electrify our power plants is very ambitious and likely means that we intend to use Mineral Mining (both here in the US and elsewhere) to get the supplies needed to build batteries. This is an EJ issue- we CANNOT mine minerals from Indigenous lands anywhere in the world! This ambitious plan looks likely to be dependent on these minerals though- we really need a different answer and I can't imagine what it is!</p> <p>Re Transportation: we need PUBLIC Transportation to be fueled by renewables, and we need walkable towns and easier access for bicycles. It is a mistake to continue to promote single cars (whether EV or not).</p>
Comment on proposed goals for natural and working lands for 2050 and strategies and commitments to achieve those goals.	<p>RE Environmental Justice (EJ) and Just Transition:</p> <p>While it is good to begin tracking and setting goals for a certain percentage of clean energy and climate investments to benefit EJ</p> <p>What we REALLY need is to ensure a just transition that protects all land (and therefore soil) from further depletion or extraction. 80% of the countries protected and healthy lands are cared for by Indigenous communities and these must be preserved (and these communities must not be forced off these lands). We also need incentives and policies and practices in EJ communities and across MA to foster Local, Regenerative Agriculture, Local and Roof Top Solar and other small scale solutions that move us to Net Zero in ways that benefit EJ populations.</p>

Completion Time	10/21/22 9:16:54
First and Last Name	Nanci Worthington
Affiliation Type	Municipal government or regional (in-state) entities;Residents or residents groups;
Affiliation name (if any)	MassAudubon and New Marlborough, MA Conservation Commission and School Committee
Comment on examples of compliance with net zero emissions in 2050.	I live in the Berkshires and being a forested land it is both a natural carbon sink and oxygen producer. Protecting this type of landscape is of local and regional importance and should be considered in development plans, making it financially viable for landowners to hold onto the lands that fall within the NWL guidelines. This can be done via direct payment for carbon sequestration via tax deductions amongst other things. The 2050 Clean Energy and Climate Plan needs policies that show greater urgency and scale for Natural and Working Lands (NWL).
Comment on the proposed net emissions accounting approach.	I am a large NWL owner in the Berkshires, land that I've lived on since 1965, and intimately know biophysical activity that creates sound environmental status. Despite voices like mine, it is still seen as "useless" land beyond its "nature lover" resort status. Energy and Climate Plan needs policies that show greater urgency and scale for Natural and Working Lands (NWL). Natural and working lands are invaluable to reaching our ambitious climate goals because they do double-duty on climate: these lands currently remove 7% of MA's annual emissions, and they help us be more resilient to climate impacts like extreme heat and growing flood risks. We simply cannot meet our goal of net-zero emissions by 2050 if we continue to lose forests, farms, and other natural lands. We need to commit to a specific quantitative goal for NWL carbon removal by 2050, and work backwards to 2030 to understand how much forest needs to be protected by then. We also need better planning to reach our clean energy goals without coming at the expense of forests. Over the last decade, we lost over 7,000 acres of forests converted just for development of large, ground-mounted solar projects.
Comment on proposed sector-specific emissions sublimits for 2050 and strategies and commitments to achieve those sublimits.	For rural residents of the Commonwealth, three things stand out: 1) Reliable, electric public transportation, like that which is common in the EU and Latin America, is critical. We drive many miles a day for work, errands and school. I am tired of hearing that it is ""too expensive"" to invest in public transport for Berkshire County. 2) The median income of the rural townships often reads high, but that is due to second home owners' incomes. Local resident incomes are generally at or below the poverty line, meaning that upgrading heating/hot water systems, including simple things like insulation and climate friendly windows, are out of reach. Grants, beyond the CDBG must be made available, either by individual or town. 3) NWL is our resource and should be treated as a resource, like gas, oil and electricity.

	<p>We need a dedicated, permanent source of public funding for land protection and restoration. We fully endorse the plan to expand nature conservation with federal and state funding, state support to municipalities and regional planning agencies. However, Massachusetts is not investing nearly enough in land protection. We should be investing a minimum \$75M annually in nature protection and restoration. And, we need to direct significant funds to increasing access to nature for communities of color and low-income residents, who have borne the brunt of exposures to fossil fuel pollution.</p>
<p>Comment on proposed goals for natural and working lands for 2050 and strategies and commitments to achieve those goals.</p>	<p>CECP policies should recognize forests not only for carbon removal but everything they do for the people of the Commonwealth. The benefits provided to our people from wetlands and forests – from filtering our drinking water, absorbing stormwaters, reducing flood risk, to providing health through recreation and access to nature – are simply irreplaceable. Proposed policies should be designed to compensate for carbon removal but also build in incentives for maintaining critical co-benefits of forests.</p> <p>We urge the Commonwealth to commit to, not just explore, setting a regulatory approach to protecting forests. It’s the only way to draw in private investment for protecting them. What has happened in the energy sector is a great example of this. By first setting well-designed regulatory standards which required an increase in clean energy production, we’ve succeeded in pulling in major private investment in clean energy, which is now a thriving new industry. We cannot reach our goals for NWL and achieve more carbon removal by public funding or voluntary efforts alone. To draw in private investment for nature protection, we need to price losses of NWL carbon in a similar way as we’ve done for energy (through renewable standards), transportation (through vehicle GHG standards) and buildings (through stretch energy codes).</p>

Completion Time	10/21/22 9:27:54
First and Last Name	Carolyn Solomon
Affiliation Type	Municipal government or regional (in-state) entities;
Affiliation name (if any)	Faith Communities Environmental Network and Dennis MA Alternative Energy
Comment on examples of compliance with net zero emissions in 2050.	I am in favor of the state's plan
Comment on the proposed net emissions accounting approach.	I am in favor of the state's plan
Comment on proposed sector-specific emissions sublimits for 2050 and strategies and commitments to achieve those sublimits.	I am in favor of the state's plan
Comment on proposed goals for natural and working lands for 2050 and strategies and commitments to achieve those goals.	I am in favor of the state's plan

Completion Time	10/21/22 10:12:26
First and Last Name	Gleb Bahmutov
Affiliation Type	Residents or residents groups;
Affiliation name (if any)	
Comment on examples of compliance with net zero emissions in 2050.	
Comment on the proposed net emissions accounting approach.	
Comment on proposed sector-specific emissions sublimits for 2050 and strategies and commitments to achieve those sublimits.	
Comment on proposed goals for natural and working lands for 2050 and strategies and commitments to achieve those goals.	<p>As a resident of Cambridge, MA I am afraid these proposals don't do enough to address the urgent climate crisis we are facing. I urge you to strengthen them to:</p> <ul style="list-style-type: none"> - require actual greenhouse gas emissions reductions, rather than reporting, especially for larger buildings - accelerate the timetable to achieve net zero to the next 5-10 years rather than 2050 - almost all scientists are now saying that 2050 is way too late - lower the number of vehicle miles traveled rather than keep it constant <p>Thank you, Gleb</p>

Completion Time	10/21/22 10:44:40
First and Last Name	Francis Cummings
Affiliation Type	Residents or residents groups;
Affiliation name (if any)	
Comment on examples of compliance with net zero emissions in 2050.	<p>i have submitted comments, including at the pre-COVID Worcester meeting in March 2020, on earlier plans in which I called for faster and greater GHG reductions, and I'm incorporating them here by reference because they are still relevant.</p> <p>In the comments I asked: "If the climate emergency becomes more extreme ... and public support increases for more ambitious policies and results, what contingency plans could be prepared now to kick in and accelerate progress?"</p> <p>To ensure that this net zero limit is achieved by or before 2050, I urge you to explicitly establish in the CECP and in agency budgeting and staffing a mechanism to identify and develop contingency plans on an ongoing basis to accelerate the emission reductions faster than the timing in the applicable plans in the event that scientists and policymakers call for such acceleration at any time in the future.</p> <p>We cannot know today how bad the #Climate Emergency may become, potentially as a result of the world's failure to achieve pledges or as climate system tipping points are better understood. As governments or people begin to support more radical reductions, the Commonwealth should have contingency plans ready to immediately accelerate the mobilization of all means to reduce emissions.</p> <p>Therefore I propose that particular agency positions in an Office of Climate Contingency Planning be explicitly assigned responsibility to maintain such contingency plans, including accelerated reduction levels and modeling of the budgets that would be required to meet them, which should also accompany future CECPs to be released.</p>
Comment on the proposed net emissions accounting approach.	
Comment on proposed sector-specific emissions sublimits for 2050 and strategies and commitments to achieve those sublimits.	<p>I support the improvements proposed by Green Energy Consumers Alliance and summarized below:</p> <ol style="list-style-type: none"> 1 Delineate how much of the 88.6% in expected greenhouse gas emissions reductions by 2050 each suggested strategy or policy is responsible for, to allow for better tracking and course adjustment as needed; 2 Require emissions reductions from large buildings (instead of just energy reporting);

	<p>3 Increase the Clean Energy Standard to 100% by no later than 2035;</p> <p>4 Track pollution levels in addition to clean energy investments in environmental justice communities;</p> <p>5 Maintain the focus on expanding workforce development;</p> <p>6 Aim to reduce vehicle miles traveled instead of just “stabilizing” total driving; and,</p> <p>7 Reconsider the impact of federal developments resulting from the Inflation Reduction Act.</p>
<p>Comment on proposed goals for natural and working lands for 2050 and strategies and commitments to achieve those goals.</p>	

Completion Time	10/21/22 13:23:13
First and Last Name	Diane Juhas
Affiliation Type	Private, non-government organizations;
Affiliation name (if any)	Mass Audubon
Comment on examples of compliance with net zero emissions in 2050.	
Comment on the proposed net emissions accounting approach.	This should include ocean-based carbon removal solutions.
Comment on proposed sector-specific emissions sublimits for 2050 and strategies and commitments to achieve those sublimits.	
Comment on proposed goals for natural and working lands for 2050 and strategies and commitments to achieve those goals.	Strongly recommend adding ocean-based solutions for carbon removal to this area. With 1,500 miles of coast line, the Bay State should explore and deploy ocean-based solutions. An example of this is the work that Running Tide https://www.runningtide.com/ is doing.

Completion Time	10/21/22 14:00:12
First and Last Name	Cathy Kristofferson
Affiliation Type	Private, non-government organizations;
Affiliation name (if any)	Pipe Line Awareness Network for the Northeast, Inc.
Comment on examples of compliance with net zero emissions in 2050.	Compliance that is based on claims that combustion of biomethane as being neutral or negative are based on gas industry marketing, not science. The building sector should rapidly transition off all combustion. The gas system needs to be phased out as quickly as possible. No blended combustion, no hybrid heating, no unnecessary "backup" combustion heating for ASHP.
Comment on the proposed net emissions accounting approach.	We need to stop combustion, including biofuels and biomass. These are not clean solutions. Over-counting on sequestration and undercounting on combustion will not get us to NZ. CCUS (Engineered carbon dioxide removal & storage) as a solution to emissions is technological wishful thinking. Please see all of the reporting about its failures.
Comment on proposed sector-specific emissions sublimits for 2050 and strategies and commitments to achieve those sublimits.	The Building Sector should not be counting on so-called "decarbonized" gases as an approach to reaching our reduction mandates. They are just a stall tactic by the gas industry to keep their revenue generating distribution system in place. Rapid transition to geothermal and electrification with EE upgrades, retrofits, demand response, etc. should be the single focus. On the Power Sector side, we need time of use rates to encourage overnight vehicle charging.
Comment on proposed goals for natural and working lands for 2050 and strategies and commitments to achieve those goals.	Strategies and goals for our NWL must include stopping the clearing of forested land for solar installs, and stopping timber harvests by DCR on public lands. Solar needs to be focused on the built environment. We need trees sequestering all carbon possible. DCR should be focused on sequestration not keeping loggers busy. We should institute a Ch61c, or similar but longer timespan program, to allow carbon sequestration as a private current use tax savings.

Completion Time	10/21/22 14:11:18
First and Last Name	Claire Kokoska
Affiliation Type	Businesses, industries, or trade groups;
Affiliation name (if any)	RISE
Comment on examples of compliance with net zero emissions in 2050.	<p>RISE would like to thank the Massachusetts Executive Office of Energy and Environmental Affairs (EEA) and the Global Warming Solutions Act (GWSA) Implementation Advisory Committee (GWSA IAC) along with its various work groups (e.g. Climate Justice, Buildings, Transportation, Electricity, and Land Use and Nature-Based Solutions) for assembling the next ambitious phase of the Massachusetts Clean Energy Climate Plan.</p> <p>Since 1978, RISE has worked to build a sustainable company that energy users and program sponsors trust to consistently deliver energy-efficiency solutions which improve living and working environments and set the industry standard for professionalism and customer satisfaction. RISE is an employee-owned company that provides turnkey services to residents, multifamily homes, and commercial & industrial entities in the private and public sector. RISE works with utilities and other energy program sponsors in MA, RI, NY, and other surrounding states to offer energy users comprehensive energy efficiency services and solar + storage installations that reduce their environmental footprint and operating expenses.</p> <p>Per the October 2022 public hearings related to the CECP 2050, IAC modeling has set Massachusetts on a pathway to achieve Net Zero by 2050 and reduce its GHG by 88.6% below 1990 levels. An Act Creating a Next Generation Roadmap for Massachusetts Climate Policy (“2021 Climate Law”) stipulated a required 85% or greater GHG reduction from 1990 levels by 2050. RISE supports the ambitious goals laid out in the CECP 2050 to usher the Commonwealth to Net Zero by 2050 among other goals related to updating greenhouse gas emissions targets by sector, increasing equitable workforce development, implementing environmental justice initiatives, and establishing further metrics to meet clean electrification targets.</p> <p>RISE further supports the CECP 2050’s goals to greatly increase solar installations, access to EV charging infrastructure, use of ductless mini splits and high efficiency heat pumps in buildings, energy efficiency measures in buildings, and equity in benefits from the renewable energy and energy efficiency transition to disadvantaged areas.</p>
Comment on the proposed net emissions accounting approach.	
Comment on proposed sector-specific emissions	RISE encourages the GWSA IAC to ensure that commercial & industrial and residential solar storage are prioritized alongside utility-scale energy storage. A

<p>sublimits for 2050 and strategies and commitments to achieve those sublimits.</p>	<p>widespread effort to increase energy storage will positively impact emergency preparedness and resiliency, demand management, grid efficiency, and electric rate control. As buildings and vehicles are electrified, far greater control of peak load will be needed to maintain an effective grid. A focus in the CECP 2050 of only utility-scale energy storage would represent a large missed opportunity to increase energy storage in other critical sectors.</p> <p>We appreciate the opportunity to submit our comments on the CECP 2050 for the consideration of the EEA and IAC.</p>
<p>Comment on proposed goals for natural and working lands for 2050 and strategies and commitments to achieve those goals.</p>	

Completion Time	10/21/22 15:21:17
First and Last Name	Birgit Kohl
Affiliation Type	Residents or residents groups;Municipal government or regional (in-state) entities;
Affiliation name (if any)	Westford Clean Energy and Sustainability Committee
Comment on examples of compliance with net zero emissions in 2050.	
Comment on the proposed net emissions accounting approach.	The accounting approach is much too vague.
Comment on proposed sector-specific emissions sublimits for 2050 and strategies and commitments to achieve those sublimits.	<p>The plan should identify reasoning for the allocations, especially where emissions are allowed to grow, such as in the case of Industrial Processes.</p> <p>It would be helpful to include here the absolute values, not just the percentages, so that one can understand the contribution of the sector to the overall emissions.</p> <p>It is strange that agriculture is not listed, as agriculture is a large contributor of emissions and sustainable agriculture provides significant promise. I recommend adding allocations for agriculture.</p>
Comment on proposed goals for natural and working lands for 2050 and strategies and commitments to achieve those goals.	<p>Please identify a single entity (EEA Secretary?) that will coordinate the implementation of this plan and be accountable to the public for meeting milestones and defending decisions. Please also define a mechanism for the public to be kept abreast of progress to the plan, such as quarterly reporting and/or updated milestones on a website.</p> <p>Please also provide insight into the assignment of goals to organizations in the executive branch (such as MassDEP and DPU), and the allocation of funds, if any, to these organizations for the purpose of implementing this plan. Ensure they are involved in the creation of any goals that are ultimately allocated to them.</p> <p>Please explain how these agencies will be incented to accept and implement goals that are in their area of responsibility? Create motivation for them to still seek to implement this plan when budgets are tight and something has to give. (I.e., recommend their unique responsibilities are included in the tasking that is reported to the governor and the public each year.)</p> <p>Please dictate that the sublimits required to be defined by sector must be identified for the 5-year increments that the economy-wide reductions are defined for.</p>

	<p>Please make the model used for assessing GHGs public, to include assumptions made, GHG contributors included, and formulas used? This will help both with the ability of the public to provide support and obtain insights, but can also help municipalities who seek to do similar assessments at the local level.</p> <p>Please show not only the sublimits below the 1990 level, but also below current level. Please also express emissions in both percentage and in actual absolute levels.</p> <p>Please provide explanations for any area which is allowed to grow rather than reduce GHG emissions (e.g., industrial processes).</p> <p>The agriculture sector emits great amounts of carbon; why are there no sublimits imposed? Please include agricultural sublimits that will help to foster sustainable agriculture in MA.</p> <p>Please explain why biofuels are in this mix at all. They may speak to energy independence, but they do not contribute to emission reductions.</p> <p>Relying on off-shore wind is better for powering communities close to the wind farms, but less effective to powering communities further away due to transmission losses. Please consider including more distributed options as well, to include promotion of solar canopies over our numerous parking areas, as well as rooftop solar.</p> <p>I applaud efforts to increase family-friendly, affordable housing stock along the commuter rail lines; but I note that those seeking affordable housing will be put off by the cost of the tickets for commuter rails. Perhaps work with the DPU to discover ways to reduce the cost of commuter rail service to enhance ridership and also enable underprivileged families to even consider moving to these new homes in the suburbs?</p> <p>Should this plan include a strategy to include the conversion of empty commercial spaces into residential ones, if current virtual work trends continue, rather than continually building more space when existing space is empty.</p> <p>Should the plans include promotion of multi-use zoning that encourages neighborhood gyms, stores, and community centers, etc. for the purpose of getting folks out of their cars and onto their feet or bikes or scooters?</p> <p>The decommissioning of some natural gas piping will dovetail with the use of “Green Natural Gas” from extinct landfills, that the utilities are planning on (or at</p>
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	<p>least National Grid is). The energy goals should address methods for minimizing leakage and inspections of the new piping.</p> <p>How do the Building Sector’s Key Targets & Metrics translate to percentage of residences and commercial square feet?</p> <p>Without disincentives to plunder forested land for the sake of building solar farms, industry will cut trees to put up solar. The net carbon balance of this is typically net negative. Please provide a negative incentive for cutting trees to erect o</p>
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Completion Time	10/21/22 15:58:00
First and Last Name	Dale LaBonte
Affiliation Type	Residents or residents groups;
Affiliation name (if any)	
Comment on examples of compliance with net zero emissions in 2050.	
Comment on the proposed net emissions accounting approach.	
Comment on proposed sector-specific emissions sublimits for 2050 and strategies and commitments to achieve those sublimits.	Much more attention should be given to community scale distributed energy generation and transmission. There continues to be too much emphasis on massive power plants and larger capacity transmission lines. Every building should become a node of energy production, not just consumption, with use of small scale solar, geothermal, low-head hydro in water pipes, among many other technologies unlikely to be commercially exploitable. More creativity needs to go into thinking about converting energy between thermal, photovoltaic and kinetic systems for energy production and storage. On- or off-shore wind and battery storage are not likely to produce much in the way of results even by 2050.
Comment on proposed goals for natural and working lands for 2050 and strategies and commitments to achieve those goals.	All natural and working lands (forests, wetlands and fields) should be treated as "reserves," with no logging or other disturbance allowed, in order to maximize the one reliable system of carbon capture there is--one that has been reducing carbon in the atmosphere for years. The biodiversity bank, water retention capacity and cooling effects are also critical to a live-able planet. Farm fields should managed with no-till regenerative practices that minimize disturbance.

Completion Time	10/21/22 16:24:32
First and Last Name	Elena Weissmann
Affiliation Type	Private, non-government organizations;
Affiliation name (if any)	Vote Solar
Comment on examples of compliance with net zero emissions in 2050.	
Comment on the proposed net emissions accounting approach.	
Comment on proposed sector-specific emissions sublimits for 2050 and strategies and commitments to achieve those sublimits.	We encourage EEA to more thoroughly incorporate equity into its emissions reductions planning. Equity needs to be front and center, and infused into each element of the rather than as a standalone bullet at the very end. EEA must be hyper-aware of who suffers the most from pollution and focus efforts on emissions reductions in those Bay Staters’ neighborhoods. We encourage a greater focus on reducing and ending reliance on peaker plants when discussing emissions reductions. We are supporting the EJ air quality monitoring bill for this reason, because we cannot only focus on emissions as a whole while we meet the needs of the climate crisis, we need to look at tangible community impacts where pollution is worst. We also encourage a focus of the economic benefits of the clean energy and efficiency transition within environmental justice communities (where peaker plants are disproportionately located), such as ownership of projects, workforce development for family-sustaining careers, bill savings, and support for business development.
Comment on proposed goals for natural and working lands for 2050 and strategies and commitments to achieve those goals.	Rubin

Completion Time	10/21/22 16:26:29
First and Last Name	Staci Rubin
Affiliation Type	Private, non-government organizations;
Affiliation name (if any)	GWSA Implementation Advisory Committee Climate Justice Working Group
Comment on examples of compliance with net zero emissions in 2050.	Please see attached comment letter.
Comment on the proposed net emissions accounting approach.	Please see the attached letter.
Comment on proposed sector-specific emissions sublimits for 2050 and strategies and commitments to achieve those sublimits.	Please see the attached letter.
Comment on proposed goals for natural and working lands for 2050 and strategies and commitments to achieve those goals.	"Please see the attached letter.

Completion Time	10/21/22 16:36:41
First and Last Name	Thomas Matuszko
Affiliation Type	Municipal government or regional (in-state) entities;
Affiliation name (if any)	Berkshire Regional Planning Commission
Comment on examples of compliance with net zero emissions in 2050.	
Comment on the proposed net emissions accounting approach.	
Comment on proposed sector-specific emissions sublimits for 2050 and strategies and commitments to achieve those sublimits.	<ol style="list-style-type: none"> 1. Given the generally low profit margin for Massachusetts farmers, major funding incentives need to be provided for farmers to convert to electric vehicles or farm vehicles should be prioritized for alternative fuel use 2. The goals for EV use must be tied to production of vehicles. Can the market supply the high number of vehicles. 3. Incentives for solar development must be carefully crafted so that high quality farm land or forest land is not extensively converted. The greatest incentives for solar development should be for rooftop solar. 4. Grid improvements must be uniformly implemented at the same time across the entire state. Frequently the rural communities in the Western part of the state get left behind.
Comment on proposed goals for natural and working lands for 2050 and strategies and commitments to achieve those goals.	<ol style="list-style-type: none"> 1. Greater land conservation in rural small towns must be matched or tied to annual incentive payments to municipalities. There needs to be a dedicated funding source for these incentives so that they don't get short-changed like the PILOT payments do. 2. Massachusetts should develop a comprehensive growth and development plan that integrates all the various plans the numerous state agencies produce. These should be done on a regional or subregional basis.

Completion Time	10/21/22 20:40:43
First and Last Name	Jacqueline Royce
Affiliation Type	Residents or residents groups;
Affiliation name (if any)	Boston Green Action
Comment on examples of compliance with net zero emissions in 2050.	
Comment on the proposed net emissions accounting approach.	
Comment on proposed sector-specific emissions sublimits for 2050 and strategies and commitments to achieve those sublimits.	
Comment on proposed goals for natural and working lands for 2050 and strategies and commitments to achieve those goals.	Organizations I belong to (eg Green Energy Consumers Alliance) are much more focused on 2030 requirements because only if we each 50% reduction by 2030 can we hope to reach to reach 85% by 2050. We need more specificity, large buildings should be required to reduce emissions instead of just energy reprinting; MA should increase its clean energy standard for electricity CES should be raised to100% by 2035! We need more emphasis on workforce development and to track pollution and health levels in EJ communities. Thank you for opportunity to offer my concerns for your consideration.

Completion Time	10/21/22 23:40:55
First and Last Name	Isabela Chachapoyas Ortiz
Affiliation Type	Academia;Private, non-government organizations;
Affiliation name (if any)	
Comment on examples of compliance with net zero emissions in 2050.	n/a
Comment on the proposed net emissions accounting approach.	n/a
Comment on proposed sector-specific emissions sublimits for 2050 and strategies and commitments to achieve those sublimits.	n/a
Comment on proposed goals for natural and working lands for 2050 and strategies and commitments to achieve those goals.	There needs to be more content in general for this section.