



BY EMAIL DELIVERY ONLY: gwsa@mass.gov

April 27, 2022

Secretary Kathleen A. Theoharides
Executive Office of Energy & Environmental Affairs
100 Cambridge St., Suite 900
Boston, MA 02114

Re: *Comments on the Massachusetts Clean Energy and Climate Plan for 2030*

Dear Secretary Theoharides:

The Cape Cod Climate Change Collaborative (“Climate Collaborative”) appreciates this opportunity to provide comments on the Commonwealth’s Executive Office of Energy and Environmental Affairs’ (“EEA”) proposed Clean Energy and Climate Plan (“CECP”) for 2030.

The Climate Collaborative is a nonprofit 501 (c) (3) organization whose mission is to reduce our region’s contribution to climate change and to protect it from its potentially devastating impacts. Our goals are to broaden understanding, deepen partnerships, accelerate programs, and inspire individual and collective action to counter the climate crisis. Our membership of nearly 3,000 individuals includes leaders from energy efficiency, business, transportation, building, education, science, faith, clean energy, public policy, environmental protection, and activist communities across the region. While a diverse group, we are united by our shared experience of residing in and caring for Cape Cod and the Islands, an area increasingly threatened by climate change impacts.

The Climate Collaborative supports the 2030 Plan and the improvements made during this public comment period. Our perspective on the final version plan is informed by some of the Cape Cod’s unique characteristics:

1. **Buildings:** Cape Cod is largely fully developed with little area available for new residential construction. Much of the existing housing stock is older and in need up weatherization (insulation and energy efficiency measures) and updating (new systems). Therefore, we support:
 - Establishing a target of 50% deep weatherization of existing housing stock by 2030
 - Making the stretch energy code mandatory and effective statewide by 2024 and applicable to a wide range of substantial renovations of existing properties
 - Incentivizing efforts to expand access to energy efficiency and clean heat systems for low- and moderate-income residents.

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2. **Transportation:** While very developed, Cape Cod is also a sprawling area without population densities that facilitate efficient mass transit systems. As a result, significant miles are traveled per vehicle. In addition, Cape Cod relies on its seasonal economy with hundreds of thousands of visitors arriving each summer, virtually all by private vehicle. In fact, according to the Cape Cod Commission's Greenhouse Gas Emissions

Inventory, Cape Cod's highest GHG emissions are associated with transportation, equaling 55.5% of total Cape inventory emissions. Therefore, we support:

- Establishing the 2030 target of one million new EVs on the road and creating additional financial incentives targeting low- and moderate-income drivers
 - Establishing a target of 100,000 publicly available fast-charging EV chargers
 - Deploying numerous fast-charging stations along state highways on Cape Cod for its hundreds of thousands of seasonal visitors
 - Providing financial incentives for EV charging station installations at multi-family properties.
3. **Natural Lands:** Cape Cod is highly vulnerable to ocean-related climate impacts, especially sea level rise, storm surge, erosion, and resulting loss of natural systems. Our fragile coastal systems both store carbon to mitigate climate change and protect us against the impacts of climate change. Therefore, we support:
- Developing robust and effective sequestration accounting and market frameworks
 - Strengthening protections for forests (including woodlands) and wetlands both inland and coastal
 - Creating incentives to facilitate coastal wetland restoration projects
 - Establishing a firm, no-net-loss of forests and wetlands policy statewide
 - Including recommendations for priority measures, monitoring programs, data collection, and resources for private landowners including voluntary landowner programs, conservation easements, tax incentives, land use policies, model zoning by-laws, and other tools

The Climate Collaborative appreciates the efforts EEA has made in seeking and encouraging public input in refining the Interim CECP and preparing the final version. The changes and improvements show that EEA is listening carefully to the views of diverse perspectives, and the Climate Collaborative applauds this ambitious plan. We commend your leadership in promoting clean energy, reducing greenhouse gas emissions, and preserving and expanding natural solutions while simultaneously prioritizing environmental and climate justice considerations. This plan can demonstrate what climate leadership looks like.

Sincerely,

Richard Delaney

Richard F. Delaney
Executive Director