



## Massachusetts Decarbonization Roadmap: Comments from Massachusetts Campaign for a Clean Energy Future

<https://www.mass.gov/forms/comments-on-emissions-limit-for-2050>

April 10, 2020

Dear Secretary Theoharides:

We thank the Baker Administration for committing to reach net zero greenhouse gas emissions by 2050. The International Panel on Climate Change states that this target is necessary to stabilize the planet's climate and protect ourselves from devastating results from the climate crisis.

We also thank the administration for the extensive planning process it is going through for how to get to the 2050 mandate and an interim goal for 2030.

The signers of this letter appreciate the opportunity to submit comments on the Commonwealth's *Determination of Statewide Emissions Limit for 2050 – "Net-Zero Determination."*

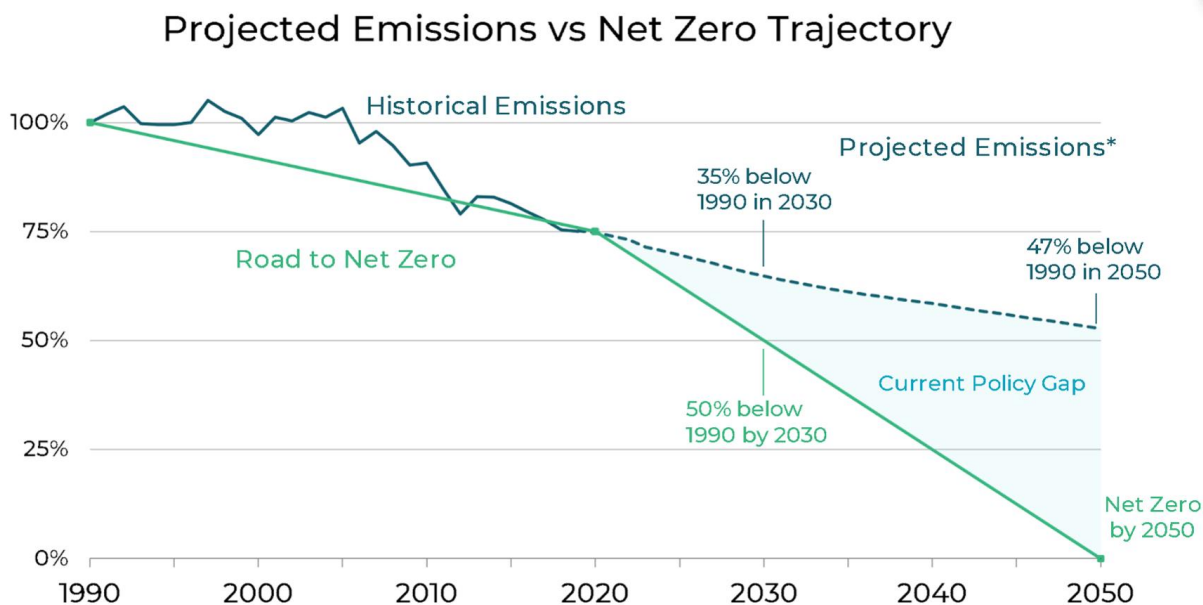
Below are our comments on the targets for 2030 and 2050, and the set of policies necessary to get us to those targets.

**2018 projections will not get us to the 2030 or 2050 goals:** EEA's latest set of public projections, made in December 2018 to the Implementation Advisory Committee (IAC), would get Massachusetts only to a 35% reduction in emissions in 2030 and a 47% cut by 2050. This compares, for example, to the latest IPCC goal of 45% below global 2010 emissions by 2030,<sup>1</sup> and to Governor Baker's call for net zero emissions in 2050. We realize that EEA is doing further projections since December 2018, with additional policies, but none are yet publicly available.

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<sup>1</sup> ["Summary for Policymakers of IPCC Special Report on Global Warming of 1.5°C approved by governments,"](#) IPCC, October 8, 2018.

To get to net zero by 2050, on a straight line from the present the state must cut emissions by approximately 50% by 2030, including any offsets. Given that much of the world will have difficulty achieving the IPCC's 45% target, Massachusetts should be a leader and set its target for 2030 substantially above 50%. The Administration's policy scenarios and modeling should include the most ambitious possible 2030 goal.



**2019 IAC policies inadequate for 2030 goal without carbon pricing:** Given the state of the science on the climate crisis, it is critical that we achieve not only the 2050 target but also the shorter-term target for 2030. The inventory of policies put out by the IAC in August of 2019 are unlikely to get us to a 50% reduction by 2030, because most of them are long-term in their impacts. These include, for example, further extension of building codes, promoting alternatives to driving, “integrate transportation and land use planning,” and “ensure Massachusetts’ electricity distribution system is 2050-compliant.”

The IAC inventory includes carbon pricing in three places – for buildings (Policy #1, “mandatory emission reductions,” pages 2 and 7), transportation (Policy #3, “price transportation externalities,” pages 6 and 30), and economy-wide (“Regional/State/Federal and economy-wide”, page 31). All three of these policies must be fully considered and included in the modeling for the GWSA targets.

**TCI will not get us to 2030 target:** The Transportation and Climate Initiative (TCI), based on the strongest scenario modeled, with a 25% reduction in transportation emissions, will only yield us an additional 3% decrease in economy-wide emissions by 2030 (federal fuel efficiency standards, which make up 19% of TCI’s reductions in transportation, are already in the 2018 projection). Thus, carbon pricing extended to the buildings sector and economy-wide must be implemented in the near future if we are to reach the 2030 target.

**Protection of low and moderate income people:** Carbon pricing policy must ensure that low and moderate income people who are the most impacted by climate change come out financially ahead. This will require both targeted infrastructure investments that help these

communities transition to low-carbon energy sources and income-based rebates to offset cost increases due to carbon pricing.

**Spending the revenues:** Billions of dollars will be needed to pay for the improvements in buildings and transportation needed to cut emissions sharply. Carbon pricing, from RGGI, TCI, and buildings can yield over \$1 billion a year in revenues, as shown in the table below.

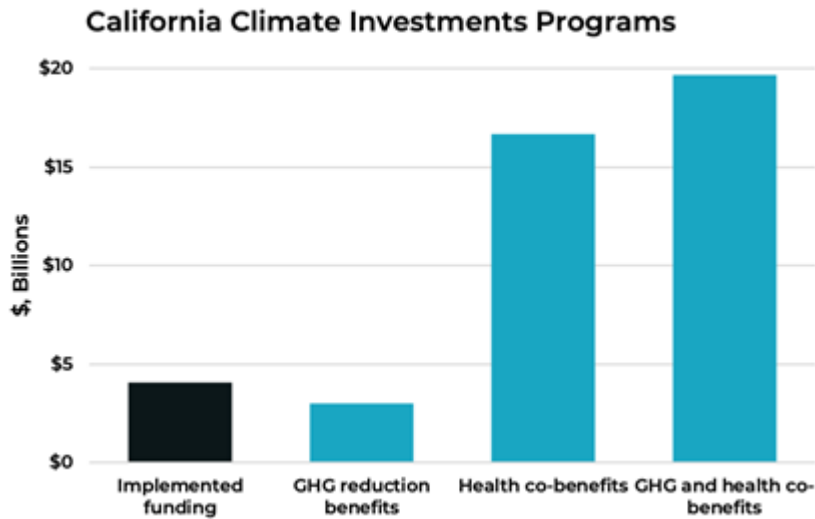
It is also sufficient to provide a high level of funding for Environmental Justice (EJ) populations. To help all members of society transition to cleaner options, at least 40% of investment funds should be directed to projects that enable low and moderate income people and Environmental Justice populations to reduce greenhouse gas emissions.

Carbon pricing sectors	Annual revenue \$ millions <sup>2</sup>
RGGI	\$90
TCI (20% vs 25% cut in emissions)	\$150 to \$590
Buildings – rising from \$20 to \$40 per ton	\$330
3 sectors	\$570 to \$1,010
To EJ populations at 40% of total funding	\$230 to \$400

**Health and other co-benefits:** A recent study by coalition member Climate XChange showed that in California’s cap-and-trade program the public health and GHG reduction benefits of the investments made with the funds raised were almost five times the cost of the programs.<sup>3</sup> We would urge EEA to fully model these health benefits in looking at the benefit-cost of its climate change programs, along with other co-benefits such as increases in employment.

<sup>2</sup> Projections made by Climate XChange based on expected emissions and price per ton.

<sup>3</sup> [Cap-and-Trade in California: Health and Climate Benefits Greatly Outweigh Costs](#), Climate XChange, March 2020.



Thank you for the opportunity to comment on the Commonwealth’s net-zero determination and plans for its 2030 limit. We look forward to further dialogue on these critical issues for the Commonwealth and the future of the planet.

Sincerely,

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Allandale Coalition

Alliance for Business Leadership

Arlington Street Church, Boston (Rev. Fred Small, Minister for Climate Justice)

Citizens Climate Lobby-Massachusetts

Clean Water Action

Climate XChange (Marc Breslow, Policy & Research Director)

Healthy-Kids.info (Ellie Goldberg)

HealthLink

League of Women Voters of Massachusetts (Judy Zaunbrecher, Co-President)

Massachusetts Interfaith Power and Light (Jim Naill, President)

Mothers Out Front-Massachusetts

Our Climate (Eben Bein, New England Field Coordinator)

Sustainable Marblehead

Western Massachusetts CAN