



December 3, 2014

Nancy Girard, Commissioner  
Environment Department  
City of Boston  
Suite 709  
1 City Hall Plaza  
Boston, MA 02201

Dear Commissioner Girard:

I am pleased to provide you with detailed comments on the 2014 Draft Climate Action Plan on behalf of the Conservation Law Foundation. Founded in 1966, CLF protects New England's environment for the benefit of all people. We use the law, science, and the market to create solutions that preserve our natural resources, build healthy communities, and sustain a vibrant economy.

It is heartening to see that the City of Boston, and Mayor Walsh as the City's chief executive, takes the threat of climate change with such grave concern. Indeed, the 2014 Draft Climate Action Plan includes critical steps that must be taken to ensure that the City meets its 2020 and 2050 climate change goals as well as ensure the climate preparedness of the City in order to protect those of us who live and/or work here. Despite the proposed actions outlined in the draft CAP, we feel that there are a number of additional measures the City can undertake to strengthen the 2014 CAP.

#### The CAP Should Include Specific Targets, Dates, and Performance Measures

In large part, the draft CAP is aspirational, in some cases lacking specific targets and performance measures. For example, on page 28, actions 1.21 and 1.22 discuss programs to be introduced in Boston Public Schools. These programs – green teams and curriculum modifications to include sustainability – are forward-thinking and have great potential to shape how our future leaders perceive and address climate change. Nevertheless, there is no date that would hold the City to implementing these two innovative programs. Also, the City might consider creating incentives for schools to adopt and showcase these programs, such as a citywide competition between schools.

Page 29, action 2.18 touches on the phasing out of carbon-intensive heating systems in residences and small businesses. This could be a very effective measure; however, it could go a step further, helping the City meet its 2020 and 2050 greenhouse gas reduction goals if tied to a date or year certain. Similarly, actions 2.12 and 2.13 could achieve more if it were tied to a deadline and specific benchmarks.

On page 38, action 1.51 proposes improved enforcement of current energy codes through inspector training. The City should commit to training inspectors within a specific timeframe. Also, in fostering sustainable transportation choices for workers described in section 1.6, this measure could more expressly

include dedicated no-cost electric vehicle parking spots with charging stations, a limitation on new parking spaces for conventionally-fueled vehicles, and the City could set an example by converting its own vehicle fleets to zero emission vehicles by a date certain. Additionally, the City should provide adequate enforcement so that EV parking spaces are truly available to qualifying vehicles.

#### Transportation Measures Should be More Aggressive

On page 44, the draft CAP refers to the fact that “a lowered, more achievable VMT reduction target of 5.5 percent below 2005 levels,” stating that it is warranted because of the rise in fuel economy. The original standard of 7.5 percent below 2010 level was set in the 2011 Climate Action Plan. On page 46, section 2.1 is titled “Maintain a VMT Target of 7.5 Percent Below 2010 Levels,” which is inconsistent with page 44. To be clear, we believe the 7.5 percent goal is achievable and would play an important role in helping the City meet its GHG reduction goals. Also, we question whether it is wise to soften the VMT target now when a fuel economy target won’t be set until some point in the future through the Go Boston 2030 process.

On the same point, section 4.1 on page 48 of the draft CAP states that the “City’s means of tracking fuel economy, commuter mode share, and vehicle miles traveled is limited” and that “[w]ithout clear measures that can be tracked year-over-year, progress towards the Climate Action Plan goals is unclear.” The fact that “Go Boston 2030 will create better and more regular data systems” is important but without more detail doesn’t address the underlying problem. The CAP must specifically commit to developing the means to track fuel economy, commuter mode share, and VMT.

On page 47, the draft CAP states that “...the City must work with the MBTA to ensure not only that it maintains a world-class level of service for existing residents as well as new residents and workers over the next five years, but also is able to increase its mode share via increased coverage and/or service.” We applaud this goal, but at the same time, we’re not sure how the MBTA is supposed to achieve this without additional funding. The CAP and Go Boston 2030 should therefore include a commitment by the City of Boston to increase its assessment to the MBTA and/or to advocate aggressively for more state dollars for the T.

With respect to the Hubway Bike Share program, there should be greater access in Boston’s lower income communities, especially Roxbury, Dorchester, and Mattapan where Hubway stations are scarce.

Page 45 includes a table of 2020 goals and targets, listing transportation at an 18 percent reduction of GHG emissions. It appears that this reduction is from 2013 CO<sub>2</sub>e for the transportation sector. We question the sufficiency of this reduction when the state Global Warming Solutions Act requires a reduction of 25 percent of 1990 levels by 2020, particularly considering that transportation is responsible for over one third of the state’s GHG emissions, and Boston – given its size and density and existing transit system – should be better equipped to reduce GHG emissions from the transportation sector than any other part of the state.

#### Residential Waste and Organics Diversion Goals Can Achieve More

Section 2.1 beginning on page 41 discusses waste and consumption. The City should institute curbside pickup of residential organic waste and a “pay-as-you-throw” trash program to increase recycling.

### The Draft CAP's Underlying Theme of Social Equity Should Be Strengthened

While we appreciate the Draft CAP's explicit acknowledgement of social equity and gentrification issues that plague the City, there is little in the plan that truly promotes social equity. The CAP should aggressively advance social equity and combat gentrification with a commitment to proactively maintain housing affordability for low income and working class families.

Furthermore, the CAP should include in its community engagement goals set out on page 27, actions 1.1 – 1.5, the development of partnerships with community-based organizations and designated funding to those groups to assist the City with outreach and education, especially in low income communities.

### Conclusion

We very much appreciate this opportunity to provide these comments on what could be the basis of a strong 2014 Climate Action Plan. As Boston's carbon footprint continues to shrink the public health as well as the environment will improve, and we will be more adequately girded against the ravages of our changing climate. The Draft CAP rightly points out that natural gas is only a temporary bridge to a clean energy future, especially considering that natural gas produces methane, a greenhouse gas that is 34 times more potent than CO<sub>2</sub>, according to the International Panel on Climate Change.

We look forward to the release of the final Climate Action Plan next month. In the interim, please let us know if you have any questions concerning these comments.

Best regards,



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