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MassIPL Comments on the Massachusetts Decarbonization Roadmap Submitted April 8, 2020

In the most strongly worded of its several reports, the Intergovernmental Panel on Climate Change (IPCC) declared in 2018 that “without increased and urgent mitigation....leading to a sharp decline in greenhouse gas emissions by 2030, global warming will [lead] to crisis after crisis for the most vulnerable people and societies”. Since 1991 Boston has experienced 21 weather related events that triggered federal or state disaster declarations. The climate emergency is also a public health crisis, and a recent study cited Boston as having the third highest mortality rate for asthma in the country and Springfield as having the highest rate of asthma hospitalizations in the country.

In his state of the state address in January of this year Governor Baker made a commitment that the Commonwealth would achieve “net zero greenhouse gas emissions” by 2050. We thank the governor for that commitment and offer the following comments on the Massachusetts 2050 Carbon Roadmap study process.

1. 2050 Emissions Limit.

The Global Warming Solutions Act (GWSA) of 2008 currently establishes a statewide greenhouse gas (GHG) emissions limit that is “at least 80% below the 1990 level”. On February 26th of this year, Massachusetts Secretary of Energy and Environmental Affairs (EEA) Kathleen Theoharides issued a Request for Public Comments regarding the 2050 emissions limit. It was accompanied by Findings of Fact that include the following:

- In order to avoid significantly damaging and potentially irreversible climate change, global atmospheric CO₂ concentrations should be stabilized at levels consistent with no more than a 1.5°C rise in global mean temperature above pre-industrial levels.
- To ensure no more than a 1.5°C rise in global mean temperature above pre-industrial levels, global GHG emissions should be reduced to at least net zero in 2050.
- Unless mitigated on the pace, scale and scope identified by the IPCC, climate change is likely to exceed the capacity of natural, managed and human systems globally and in the Commonwealth to adapt to it.

The IPCC definition of net zero carbon dioxide emissions is: “Net zero carbon dioxide (CO₂) emissions are achieved when anthropogenic CO₂ emissions are balanced globally by anthropogenic CO₂ removals over a specified period.” In order to achieve the goals stated in the above findings of fact Massachusetts should adopt the IPCC’s definition of net zero carbon dioxide emissions.

We recommend that:

- Massachusetts should adopt a 2050 emissions limit of net zero greenhouse gas emissions defined as follows:

“A level of statewide greenhouse gas emissions that is achieved when anthropogenic GHG emissions are balanced by the amount of anthropogenic GHG removals stored annually by, or attributable to the Commonwealth of Massachusetts.”

Offsets should not be included in the determination of when net zero GHG is achieved. If offsets are used however, they must be, real, additional, verifiable, enforceable and permanent, and meet the requirements established by the Regional Greenhouse Gas Inventory (RGGI).

2. 2030 and 2040 Interim Limits.

Average temperatures have already increased by 1.2 degrees and there are already enough GHGs in the atmosphere to cause significant additional warming. It is therefore essential that interim limits for 2030 and 2040 be as strict as possible.

We recommend that the 2050 Roadmap:

- Include one or more scenarios in modeling that will substantially accelerate GHG reductions between now and 2030 consistent with the most up-to-date climate science in order to identify the lowest level of 2030 GHG emissions that could be obtained with the strongest state policies.
- Modeling should not be limited to a “straight line” progression back from net zero in 2050; and,
- The **absolute minimum** interim reductions should be 50% by 2030 and 75% by 2040.

A recent study of California climate change policies shows that the benefits that have been achieved are worth 5 times the cost of their implementation. The longer that GHG reductions are delayed in Massachusetts, the longer vulnerable individuals will suffer, and the more severe will be the damage to public health and property.

3. Climate Justice.

Leaders of the Black Church in the United States declared in 2015 that climate change was “a moral issue and one of the **greatest public health challenges of our time** particularly for Black and other marginalized communities” because...Breathing dirty, carbon-polluted air...contributes to thousands of asthma attacks, hospital visits, and premature deaths every year..” *A Rabbinic Letter on the Climate Crisis* signed by more than 400 rabbis, also in 2015 proclaimed that “the poor in America and around the globe are **the first and the worst to suffer** from the typhoons, floods, droughts, and diseases brought on by climate chaos.” Last year Pope Francis declared that “Faced with a climate emergency, we must take action...in order to avoid perpetrating a **brutal act of injustice towards the poor and future generations.**” Massachusetts faith leaders across the religious spectrum have signed petitions, advocated before the legislature and participated in civil disobedience, all with the goal of fighting for bold solutions to address climate injustices.

The modelling for the 2050 Roadmap must carefully evaluate whether proposed policies are designed to restore the enormous damage already done to environmental justice communities in Massachusetts.

We recommend that the modeling include evaluation of:

- Whether historically marginalized communities participated meaningfully in the development of particular policies;
- The extent to which the policy contributes to improved safety, air quality, and public health in historically marginalized communities, especially those with disproportionate numbers of people of color, lower-income residents, and English-isolated residents;
- The extent to which the policy confers economic, social, and health benefits for historically marginalized communities, especially for environmental justice populations;
- Whether the policies target distribution of benefits to environmental justice populations; and
- Whether polluters are contributing a financial share that is proportionate to their GHG emissions contributions.

4. Carbon Pricing.

Three-hundred thirty Massachusetts faith leaders have signed the *Massachusetts Interfaith Call for Carbon Pricing*, calling for “a price on carbon that reflects its costs to the climate, public health, and the economy.” Pope Francis has stated that “carbon pricing is essential if humanity is to use the resources of creation wisely.” “Our use of the world’s natural resources can only be considered when the economic and social costs of using them are transparently recognized and are fully borne by those who incur them, rather than by other people or future generations (cf. *Laudato Si’*, 195). Similar positions have been taken by the national bodies of the Union for Reform Judaism, the United Church of Christ and the Episcopal Church, USA, among others.

Further complicating the crisis, the economic harm being caused by the Covid19 pandemic will have serious impacts on the budgets of state and municipal entities. By adopting a “polluter

pays” principle, carbon pricing provides a much-needed alternative source of the revenues that will be needed during the hard times ahead.

We recommend that:

- Massachusetts commit to **economy-wide carbon pricing**. Our state cannot achieve a 50% reduction in GHGs by 2030 unless we commit to carbon pricing across the transportation and the building sectors. The Transportation Climate Initiative, coupled with other Administration efforts focused on the transportation sector, may get us to a 38% emission reduction by 2030, but we will need carbon pricing to make the deeper reductions needed.
- Carbon pricing policy must **address the impact on low- and moderate-income people** by providing rebates, weighted to be larger than cost increases for low-income people. Moderate-income people should get rebates that cover their projected increases in fuel prices.
- A percentage of revenues from carbon pricing **should be invested in clean energy and transportation**, to accelerate the transition to a green economy. To help all members of society transition to cleaner options, at least 50% of investment funds should be directed to projects that ameliorate the past and future damage to environmental justice communities.

The forward to the IPCC Special Report on 1.5 degrees Celsius, concludes with the words, ***“Every bit of warming matters, every year matters, every choice matters.”*** Please be guided by those words as you make your decisions.

Thank you for the opportunity to provide these comments on this critically important phase of addressing the climate emergency in Massachusetts.

With gratitude and hope,
Jim Nail, President
Massachusetts Interfaith Power & Light