The Honorable Stephanie Pollack,  
Secretary Department of Transportation

The Honorable Matthew Beaton,  
Secretary Executive Office of Energy and 
Environmental Affairs

January 26, 2017

Dear Secretaries Pollack and Beaton,

As businesses with operations in Massachusetts, we appreciate the opportunity to provide comments on efforts to reduce greenhouse gas emissions in the transportation sector and advance a clean transportation future. We were pleased to see the Commonwealth engage in formal transportation listening sessions in October and November, and look forward to additional opportunities to weigh in on these critical issues.

Transportation has surpassed the power sector as the largest source of greenhouse gas emissions in the United States. In the years since Massachusetts passed the 2008 Global Warming Solutions Act (GWSA), it has become increasingly clear that complying with the law’s emission reduction requirements will require significantly cutting emissions in the transportation sector. Lawmakers should therefore take action to reduce transportation emissions—helping ensure the Commonwealth can attract talent, grow businesses, and invest in a low-carbon future.

Massachusetts currently imports nearly all of our transportation fuels from beyond our borders, which sends approximately $11.6 billion out of the Commonwealth each year. By accelerating the transition to electric vehicles (EVs) or other advanced technology vehicles, we can ensure that more funds remain in Massachusetts and support economic development here at home. Our operations are also exposed to the volatility of fossil fuel prices, which hurts our ability to plan long-term and invest into the future. Electric vehicles can also help Massachusetts reduce business exposure to price fluctuations and the risks of supply disruption, which would improve stability and predictability for the business community.

More and more companies are setting ambitious goals around EVs and clean transportation. Nearly half of Fortune 500 companies have set at least one clean energy target, and reducing transportation emissions is an important part of that effort. Supportive state level policies are consequently needed to help businesses meet their objectives and reduce their footprint.

We therefore submit the following recommendations on how Massachusetts can accelerate EV adoption and reduce transportation sector emissions:

- **Massachusetts should participate in the design and implementation of a regional market-based approach to reduce transportation emissions.** We have already witnessed the successful model of the Regional Greenhouse Gas Initiative (RGGI). A similar, market-based approach can help Massachusetts become a global leader in strategic transportation emission reductions. Massachusetts leadership on reducing emissions and promoting clean energy has been an economic boon for our Commonwealth, and we hope to see the same ‘Bay State leadership’ through efforts to reduce transportation emissions.

- **Advance transportation investments to encourage walking, biking, and public transit as viable**
and enjoyable alternatives to driving. Massachusetts needs a public transit system that people can rely on to connect them to jobs and other opportunities. Our public transit system remains besieged with delays, and our commuter rail system had more trains break down last year than any other transit system in the country — even though the T runs less than half the number of miles of its New York and New Jersey counterparts.\(^1\) By increasing long-term investments in our public transit system, Massachusetts can continue to lead in the low-carbon transportation future. Massachusetts should also invest in making communities more bikeable and walkable, which would make our air cleaner, communities healthier, and commutes safer.

- **Develop programs and offer incentives to support the growth and transformation of the EV market.** This includes increasing the Commonwealth’s focus on consumer awareness and education as well as cash rebates, grants, and tax credits for consumer and corporate purchases of EVs and installation of EV charging infrastructure. Investments in EV charging infrastructure should address gaps in the current market and funding sources, and should not displace existing or planned investments. A recent report by Ceres and M.J. Bradley & Associates found that the benefits of increased investment in electric vehicle charging infrastructure outweigh the costs by more than 3 to 1.\(^2\)

- **Locate EV infrastructure investments at sites that are best situated to accelerate clean vehicle adoption, and barriers to installation should be removed.** Infrastructure investments should be focused on hubs including workplaces, entertainment venues, highway corridors, and multi-unit dwellings. Strategic siting can extend electric range for EV drivers, reduce “range anxiety,” and spur additional vehicle sales. Where appropriate, the Commonwealth should ensure that new developments are EV charging “ready” and that processes, from permitting to building codes, enable rather than restrict the speedy installation and strategic siting of charging infrastructure.

- **Solicit and support electric utility program proposals for consumer education and charging infrastructure investment.** Of particular importance is the implementation of well-designed time-of-use charging rates which will maximize consumer fuel cost savings and reduce stress on the grid during peak use hours, thereby reducing electricity costs for all ratepayers.

- **Prioritize investment in communities disproportionately affected by higher levels of pollution, nonattainment/maintenance areas, or designated Federal Class 1 areas.** Low-income communities and communities of color face disproportionate impacts from transportation pollution, and efforts to reduce transportation sector emissions should focus on reducing inequalities.

Thank you again for the opportunity to provide comments on these important issues. Please do not hesitate to contact us with any questions.

Sincerely,

Baldwin Brothers  
Saunders Hotel Group  
The Green Engineer  
BCK Law, P.C.  
Schneider Electric  
The Sustainability Group at Loring, Wolcott, and Coolidge  
Cambridge Energy Advisors  
Stance Capital  
Trillium Asset Management  
Greentown Labs  
Studio G Architects  
Worthen Industries  
IKEA  
Sustainability Roundtable Inc.  
Trip Zero  
JLL  
Tech Networks of Boston  
Worthen Industries