

November 19, 2018

Greetings –

I offered detailed public comment at your October 24 hearing on the draft Regional Policy Plan, based on guidance asking for specific suggestions rather than general comments.

After my remarks, a Commission staff member asked if I would translate my 6 pages of hand-scribbled notes into readable comments. I started on that time-consuming process. Last week, I noticed that minutes from that hearing had been prepared. They missed a number of my spoken points. Some were extemporaneous rather than from notes. Presumably if not captured in minutes, they weren't registered as public comments. That is concerning.

Below represents an incomplete representation of my comments at the public hearing as well as an extension of them. Please provide a written response indicating how they've been addressed, or why they haven't been, once you complete the next draft of the RPP. I am glad to answer any questions or to elaborate on points presented.

Executive Summary

P. 2

- Commission must apply a climate lens to the entire RPP, from the start.
- Plan should acknowledge at highest level (first paragraph) that collective actions – land use, fossil fuel combustion, etc., on the Cape and around the globe – pose a particular threat to the Cape as a remnant of past climate episodes.
- Growth policy should acknowledge that locating growth in activity centers and other areas served by adequate infrastructure, while the right approach, is not sufficient in and of itself to protect Cape Cod due to the climate crisis. That creates rationale for Commission to take aggressive stance.

P. 3

- Key Challenges should acknowledge that climate change poses an existential threat to Cape Cod – going far beyond flooding and erosion to include what defines the region: our weather (temperatures and precipitation), species and habitats, water quality, public health, insurance costs and risks, etc.

PP. 4-7

- Shortcomings above lead to missed opportunities in setting goals and objectives, establishing regional performance measures, recommending actions.

Section 1

PP. 14-15

- Purposes of CCC Act cannot be met without leadership from the Commission in (1) reducing greenhouse gas emissions due to land use, transportation, and other factors directly under the Commission's purview and (2) increasing

natural sequestration through planting trees and protection of forests, marshes, etc. Fix this.

Section 4

PP. 28-29

- Development/Housing discussions should acknowledge basis in fossil fuel combustion and thus adverse consequences to climate/overall region.

PP. 31-32

- Description of transportation network does not include a word about how the network functions (fossil fuels) and its impacts to air quality and climate. Change this – state the obvious, over and over, to justify later actions.

P. 33

- Description of utilities should mention the Canal Plant's two derelict units, Unit 3, and planned offshore wind projects plus the challenges with grid reliability especially on Outer Cape.
- Discussion of electricity supply options is inaccurate – many suppliers exist including Compact aggregation, Eversource, competitive suppliers; Compact deserves distinction because of local control and opportunity for local change. Important to note here and elsewhere that Compact does not offer “100% green electricity” – it is only purchasing 1% more Class 1 RECs than required under state law. Class 1 RECs are the only RECs that matter from a climate mitigation perspective and should be promoted.
- Discussion of gas network should address where it stops (Eastham), how that affects choices in some areas of Cape, possible safety issues, methane leaks.
- Regional solid waste infrastructure and issues should be discussed, including interconnection with rail system.

Section 5

P. 38

- Loss of forest cover is highlighted, but impacts on a key ecosystem service function—carbon uptake and storage—are not. They should be.

P. 39

- CECs are a threat today, not a future threat—residents in Hyannis, Eastham, near the base will testify to this fact. This should be acknowledged

PP. 40-41

- Climate change is discussed as a major threat but adaptation is presented as the only response. Mitigation is essential at all levels. Why choose to ignore this – mitigation must be addressed equally.
- Discussion focuses on “adequate infrastructure” – what about **appropriate** infrastructure? Section should discuss the need to modernize and decarbonize all infrastructures, including the power grid, solid waste, and reuse/recycling/composting systems.

Section 6

- Generally, this section is where the failure to integrate climate/energy considerations becomes very evident, in that goals and objectives are not responsive or commensurate with threats posed. Comments below apply to pp. 71-74 as well.
- Natural Systems section needs goals and objectives relating to protecting, restoring, and enhancing uptake and sequestration of carbon and to preventing/controlling natural emissions of methane, etc.
- Coastal Resilience section is spot on in having a goal of preventing and minimizing human suffering and loss of life but that is impossible when goals and objectives relating to Capital Facilities and Infrastructure, Transportation, Energy, and Solid Waste have nothing (or little) to say about cutting emissions. Fix.
- Generally, goals and objectives should align with, support, and even exceed those under the Global Warming Solutions Act – 25% by 2020 and 80% by 2050 – and in the state’s zero waste plan.
- Energy/climate goals should tie to stakeholder-defined goals through the Cape Cod Climate Change Collaborative – 50% fossil fuel reduction, 100% renewable electricity, net-zero Cape & Island region

Section 7

P. 52

- The Regional Transportation Plan should include a vision for and focus on electrification, including charging stations, public transit, etc. Transport systems based on fossil fuel combustion are the Cape’s and the state’s largest source of GHG emissions.

PP. 53-56

- Resilience Planning section is okay as it stands but renewable energy siting and green communities should not be addressed here -- there should be a separate section on Climate Mitigation Planning consistent with GWSA targets.
- Energy discussion focuses on electricity production, with extraneous discussion of the Renewable Energy Standard. This is the cleanest part of our energy system and not the aspect that deserves highlighting. And if you want to talk about it, discuss the importance of RPS-compliant Class 1 RECs – anything else is greenwashing.
- DRIs include buildings, facilities, and infrastructure that will last decades, beyond 2050 – when state law requires an 80% reduction in emissions. Commission should ensure that DRIs are capable of achieving compliance with state law – putting solar panels on the roof is not enough, projects like the new Cape Cod 5 need to be running on all-electricity rather than natural gas.
- Efficiency and the use of green electricity throughout heating and transport systems should be highlighted. Audits and building codes alone are not enough – should be looking at zero net construction for DRI projects and development more broadly.

- Solar siting guidance must focus on degraded land, buildings, parking lot canopies. Must discourage forest clearing, conversion of agriculture/open space.
- Ocean Management Plan discussion should address bulk imports to local grid from offshore wind, critical component in electrification and decarbonization. Should also put offshore sand mining in context – not a solution, or even a bandaid.

Section 8

P. 65

- Areas with industrial zoning should not be designated as industrial activity centers when located in areas with Zone 2 resource protections, like in Brewster. Please verify that placetypes will reflect true context, not just zoning. In Brewster, the huge sand mine was allowed to expand illegally, and reclamation requirements are lacking. Brewster officials also tried to clearcut 30 acres of Zone 2 property for an industrial solar plant, without regard for ecosystem service values despite municipal water supply wells in the area.

Section 9

- A streamlined regulatory approach will inevitably have negative impacts if the true costs of resource development – especially carbon emissions – are not properly accounted for in Commission decision-making and regional mitigation. Consider the rubber-stamp to Canal 3: almost 1 million tons of carbon can be released annually affecting all of Cape Cod, while Sandwich gets > \$50 million plus additional funding from Canal 1 and 2, which can continue to operate with high inefficiency and emissions.
- Commission leadership and staff and have expressed that Technical Bulletins are the appropriate place in the RPP to address climate mitigation. These apply only to DRIs – a small fraction of development, redevelopment, and growth occurring across the Cape. They also are not part of the RPP, they are supplements; are they even approved by Assembly? Outsourcing regulation and making it optional are not consistent with enabling legislation.
- That said, if Commission were to declare entire region a DCPC due to emissions, and make everything subject to tight controls, then this approach has a little more merit.

Section 10

- The Commission should take ownership of a regular and comprehensive CO₂-equivalent emission inventory accounting for energy, waste, land use, etc. – sources and sinks. The Commission helped with the previous energy/emissions inventory done (by me) for calendar year 2007; 4 million metric tons due to energy consumption, with transport emissions the largest fraction. The Commission should lead on this to support planning and regulation and help the towns manage their energy use and emissions. You can't manage what you don't

measure, and the state's annual inventory does not offer timeliness nor granularity to county/town level.

- Critically, Commission should apply the data to lead in climate mitigation across all sectors – energy, transport infrastructure, building heat electrification, planting trees. Dozens of solutions to promote through future RPP and ongoing activities. Think broadly, e.g., for DRIs and more broadly, promoting shell driveways would take mineralized CO₂ out of the ocean, sequestering carbon.
- Having the data would allow Commission to lead in understanding and maintaining regional consistency with state targets and regional goals and objectives.

Section 11

P. 78

- Natural Systems area should account for the need to understand and enhance natural sequestration mechanisms. This is a huge opportunity for the Commission to innovate in soil carbon, tree planting, wetland management, aquacultural mineralization, etc.

P. 79

- Built Systems - Again, there should be a separate heading on Climate Mitigation. Commission should conduct a comprehensive emission inventory – sources and sinks – to help understand and track progress toward regional goals such as those developed through 5Cs.
- No waste actions: What about a regional zero waste plan? Are we stuck with Bourne Landfill and SEMASS incinerator forever? Yarmouth digester could be a huge plus for getting organics out of bury/burn stream, but dirty sludge/biosolids should not be mixed with clean food/other organics. Otherwise the end product is contaminated by toxics and can't be applied for agriculture without creating possible downstream risks. Regional planning is the best way to address issues like this, rather than vendors selling projects to towns without broad context.
- Why not a Regional Net Zero Housing Plan – instead of just a housing plan?

Final Thoughts

The “adequate, reliable, and diverse supply of energy” set by the Commission as a goal is not good enough given today's and tomorrow's climate threats. The Commission has the power and the opportunity to make a huge difference – why is Commission (or management and staff) choosing to keep head in sand? Are you afraid of adverse economic impacts? Or political repercussions?

Look at what the municipal appointees on the Cape Light Compact Governing Board just did: They approved imposing \$166.8 million in charges on all ratepayers on the Cape and Vineyard over the next 3 years to increase energy efficiency and to do visionary things like demonstrate integration of advanced electric heat pumps, solar PV, and battery systems. This will show how to drive fossil fuels out of the building sector while also avoiding peak demand impacts. That's real leadership.

Why not from the Commission? You could make the whole region a DCPC and apply a carbon tax. You don't have to go that far – but you need to do something, and you have opportunity to go big. Advocates and experts stand ready to help.

Please take action through this RPP, commensurate with the threat and opportunity to lead.

Best,

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