



March 22, 2021

Secretary Kathleen Theoharides
Executive Office of Energy and Environmental Affairs
100 Cambridge Street
Boston MA, 02114

Dear Secretary Theoharides,

Thank you for the opportunity to provide comment on the Interim Clean Energy and Climate Plan for 2030.

The Massachusetts Association of Community Development Corporations (MACDC) is an association of mission driven community development organizations dedicated to working together and with others to create places of opportunity where people of diverse incomes and backgrounds access housing that is affordable, benefit from economic opportunities and fully participate in the civic life of their community. We achieve this by building and by sustaining a high performing and adaptive community development sector that is supported by private and public investment and sound public policies.

MACDC is a Founding Member of the Massachusetts Smart Growth Alliance (MSGA), a coalition of organizations working on a broad range of policy issues at the intersection of housing, transportation, and climate change. We are a signatory to the MSGA comment letter submitted on the Clean Energy and Climate Plan for 2030. As such, we fully endorse MSGA's comments, including the following:

- Without long-term investments in a robust and reliable public transit system, and changes in our land use policy to support more dense, affordable, mixed-use development near transit, pursuing decarbonization through electrification of the transportation system alone will exacerbate existing inequities.
- We urge EEA to put greater emphasis on the importance of investments in our public transit system as a pathway for decarbonization. The climate mitigating effects of producing more housing and enabling more compact, mixed-use development near transit are undermined if transit service is unreliable and people still need to travel by car. Additionally, our public transit system must be nimble enough to accommodate the evolving commuting patterns of the future.
- In addition to increasing investments in transportation and fostering more transit-oriented development, decarbonizing buildings is essential to complying with the Commonwealth's emissions targets for 2030 and 2050. Decarbonizing the building sector offers a host of co-benefits, including improving public health outcomes,

creating thousands of well-paying jobs, and addressing the Commonwealth's housing crisis by constructing energy efficient, affordable homes.

We have additional comments, based on the work that community development corporations are doing to create and preserve affordable housing that provides a safe, quality living environment for all residents of the communities they serve. This work is informed by the structural inequities that low-income communities, and communities of color, often face in securing the housing they need.

From this experience, and perspective, we offer the following additional comments:

- To facilitate the rapid and efficient decarbonization of our older housing stock- especially smaller properties- it is essential that clean energy and climate funding be leveraged with housing dollars and vice versa. It is equally essential that these dollars be delivered through a single, simple, efficient funding process that does not require homeowners, landlords, property owners, CDCs, municipalities or others to apply to multiple sources and deal with different rules, timelines and requirements. We cannot have our housing and energy agencies fighting over who pays for which expense when we need a whole building approach to decarbonization.
- Significant improvements to older housing in our Gateway Cities offer many benefits to residents in these communities, but can also generate the risk of rising rents and reduced affordability. The Commonwealth needs to develop a policy toolbox to mitigate these concerns and ensure that we have energy efficient, climate-resilient housing that remains affordable across all income levels. This will require subsidy, but also constraints on rent increases, property flipping, speculation and other real estate practices that harm vulnerable populations.

Thank you for your consideration of these comments. We look forward to partnering with the Commonwealth to implement a comprehensive decarbonization strategy. Feel free to reach out to me if you have any questions. I can be reached at 617-379-5922.

Sincerely,

A handwritten signature in black ink, appearing to read "Joseph Kriesberg". The signature is fluid and cursive, with the first name "Joseph" written in a larger, more prominent script than the last name "Kriesberg".

Joseph Kriesberg
President & CEO