



April 12, 2023

Mayor Sumbul Siddiqui
Councilors Patty Nolan and Quinton Zondervan
Members of the Cambridge City Council Ordinance Committee
Cambridge City Hall, 795 Massachusetts Ave
Cambridge, MA 02139

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RE: A Better City's Comments on the City Manager and CDD's draft of the Cambridge BEUDO Amendment

Dear Mayor Siddiqui, Councilors Nolan and Zondervan, and distinguished members of the Cambridge City Council Ordinance Committee:

A Better City's membership represents 130 of Greater Boston's business leaders across multiple sectors of the economy, including close to 20 member organizations who are property owners or operators in Cambridge. On their behalf, we are providing comments on the latest draft of the Building Energy Use and Disclosure Ordinance (BEUDO) amendment, proposed by City Manager, Yi-An Huang, Assistant City Manager for Community Development, Iram Farooq, and Community Development Department staff, notably Susanne Rasmussen and Seth Federspiel, on April 12, 2023.

A Better City's comments are specific to the BEUDO process based on over two years of working very closely with the City of Boston on their Building Performance Standard, BERDO 2.0. The BERDO process has been driven by robust stakeholder engagement, with the City of Boston's environmental staff, advocates, and the business community, all of whom have come together to pass the ordinance and work collaboratively through the regulatory process.

In contrast, since early 2022, the process led by the Cambridge City Council has unnecessarily pitted environmental advocates against large buildings despite shared goals. In doing so, this process has failed to leverage the expertise of the national sustainability leaders within the real estate community and the experts on the City's environmental staff.

The process has dismissed some of the real challenges associated with decarbonizing existing large buildings, which are very different to decarbonizing a home. Similarly, the process has failed to consider the utilities' data that shows that by requiring large existing buildings to be net zero by 2035 in Cambridge, a percentage of the limited resources the utilities spend annually



will be dedicated to Cambridge alone—at the expense of other communities, including under resourced and environmental justice communities.

It is well understood that the 2035 net zero goal for existing buildings cannot be technologically realized and will instead result in Alternative Compliance Credit payments that will stifle building owner's progress toward true GHG reduction work. The purpose of this ordinance should be to reduce GHG, not to penalize partners for an inability to achieve an infeasible target.

A Better City supports the City of Boston and Commonwealth's goal of achieving net zero in existing buildings by 2050 and does not believe a 2035 goal is currently feasible. However, if Cambridge moves forward with a 2035 goal, we support the approach laid out by the City Manager and the Community Development Department's team, as it allows flexibility, including the use of offsets for fossil fuel use, exemptions, baseline options, and a 2031 review. In addition, purchasing of offsets must remain separate from price parity with alternative compliance credit payments.

We remain committed to working with your expert staff and with all stakeholders to find solutions to the challenges and opportunities within large existing buildings so we can meet the GHG reduction goals necessary to reach global climate change goals.

Sincerely,

Y. L. Torrie

Yve Torrie

Director of Climate, Energy & Resilience

CC: Yi-An Huang, City Manager and B Kimmerman, Chief of Staff for City Manager
Iram Farooq, Assistant City Manager for Community Development
Susanne Rasmussen and Seth Federspiel, Community Development Department