

Dear Mayor Siddiqui,

MIT, Harvard, MassBio, the Cambridge Chamber of Commerce, and the Kendall Square Association are pleased to submit our collective edits to the proposed 4/6/22 version of the City's BEUDO ordinance amendment (attached). As you know from our discussions, we are all actively investing in building decarbonization and the pursuit of net zero plans.

Our edits create the flexibility required to enable the accelerated goal of establishing 2035 as the City's net zero target (in contrast to Boston's and the Commonwealth's targets of 2050) — and allow that objective to be reached through the most efficient science-based pathways and mechanisms. Our primary edits (and their corresponding pages in the document) are as follows:

- 1) Pages 1-2: Allow verified global carbon credits to offset 100% of emissions through 2035, 50% through 2050, and 0% after that. This is a tremendous, ahead-of-the-curve, opportunity for Cambridge. Our further thoughts are below:
 - The credits will be third-party verified Greenhouse Gas Emissions credits issued by an International Carbon Reduction and Offset Alliance (ICROA-endorsed) voluntary carbon offset standard
 - Verified global carbon credits will definitively offset carbon emissions and are the appropriate investment to be made at this time since verified local offset carbon credits do not yet exist
 - Cambridge can lead the way in catalyzing immediate global impact by incorporating verified carbon credits, rather than imposing compliance penalties that do not result in reduced emissions
 - This approach incorporates significant social, health, and environmental justice benefits at a local and global scale
 - This path enables transformations for technologies and markets that remove metric tons of CO₂ completely from the atmosphere
 - Financial support of local sustainability initiatives that do not achieve verified carbon credits should be provided by the City
- 2) Page 4: Allow the application of RECs to on-site generated energy with lower carbon intensity than the ISO-NE grid. This will ensure that highly efficient cogeneration plants are not penalized.
- 3) Pages 13-14: Allow the use of alternative compliance plans that can be approved by a designated body to acknowledge the differences among property owners'

portfolios and ensure that the ordinance's goals are being met. This would allow flexibility for baseline determination, deferred credits, and pre-established net zero plans in progress. Boston's BERDO includes this mechanism and can serve as an instructive example.

Additional edits in other sections provide further clarity to various definitions and terms.

Finally, based on comments at the end of our Tuesday 4/12/22 meeting, we would like to be assured that the BEUDO ordinance will maintain its focus on operating emissions from existing buildings, and not be altered to create penalties for embedded emissions related to the construction of new buildings. While we do not believe that penalties for embedded construction emissions are appropriate at this time, we would be open to forming a working group with City representatives and affected stakeholders to evaluate a prudent path forward in this nascent and unregulated area of understanding.

We thank you, sincerely, for your leadership in this important matter and process.

With respect,

Cambridge Chamber of Commerce

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David Maher, President and CEO

Harvard University

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