



March 15, 2022

Bill: City Operations - Net-Zero Emissions of Greenhouse Gases (21-0161)
Position: Favorable with Amendment

Dear Committee Chair McCray and Members of the Committee,

Blue Water Baltimore's mission is to restore the quality of Baltimore's rivers, streams, and Harbor to foster a healthy environment, a strong economy, and thriving communities. We strongly support City Operations - Net-Zero Emissions of Greenhouse Gases (21-0161) with amendments.

The climate crisis is here, and it is already causing harm to Baltimore's communities, waterways, and environment. Rising temperatures exacerbate the urban heat island effect and disproportionately impact formerly redlined neighborhoods.¹ Increased rainfall causes hazardous flooding and sewage backups across the city, particularly in predominantly Black communities which have received inequitable investments in city infrastructure.² As the climate continues to warm, environmental injustices such as these will worsen in Baltimore.

Baltimore must take urgent action to mitigate the effects of climate change and to increase the city's resilience in the face of this crisis. The City of Baltimore has taken steps to reduce emissions over the past decade,³ and the Scott administration recently committed to becoming a carbon neutral city by 2045.⁴ By making City government operations net zero, 21-0161 will help codify the Mayor's commitment, reduce local emissions, and enable the City of Baltimore to model the net zero transition required across the city to reach the 2045 target. As the City Council considers this important bill, it should strengthen it by speeding up the timeline, reducing the use of offsets, centering environmental justice, increasing participation and transparency, and ensuring there is adequate capacity to carry out this work.

Specifically, the timeline should be moved up to 2045 and interim emission reduction goals of 30% by 2025 and 60% by 2030 should be established to bring 21-0161 in line with 21-0075R, which the City Council adopted earlier this year. The City Council should also change the definition of "net zero emissions" currently included in the bill to limit the use of offsets, define carbon offsets, and add parameters for what types of carbon offsets will be accepted. We recommend adopting the definitions from Austin's Climate Equity Plan⁵ (see suggested amendments 1-4 at the end of this document).

As we have noted in previous testimony, "net zero" does not mean the same thing as "zero emissions." Becoming net zero simply means that Baltimore's greenhouse gas emissions are balanced by the amount of emissions the city removes from the atmosphere through carbon

¹ Roxanne Ready, et al. (2019). [No trees, no shade, no relief as climate heats up](#). Capital News Service.

² Ian Duncan. (2017). [Study finds deep racial disparities in way Baltimore allocates public construction dollars](#). The Baltimore Sun.

³ Dylan Gaeta et al. (2020). [City of Baltimore 2017 Greenhouse Gas Emissions Inventory Report](#). Department of Environmental Health and Engineering, Johns Hopkins University.

⁴ Mayor Brandon M. Scott. (2022). [Mayor and Sustainability Office Release Carbon-Neutral Goals for Baltimore City](#).

⁵ Austin Climate Equity Plan Steering Committee. (2020-21). [Austin Climate Equity Plan](#).

sequestration, offsets, or other mechanisms. By contrast, *zero emissions* means a hard end to all emissions with no balance sheet or offsets. Zero emissions should be the ultimate goal in order to truly limit the effects of climate change, but well-crafted net zero policies can help cut emissions and build toward that target.⁶

Since climate change disproportionately affects low-income and Black, Indigenous, and People of Color (BIPOC) communities, any actions to address the climate crisis must center these communities. Therefore we urge the City Council to incorporate language into 21-0161 committing to prioritize any building upgrades, capital projects, or other investments associated with this bill in communities on the frontlines of climate change (see suggested amendment 5). The University of Maryland's Environmental Justice Screen Tool provides detailed, census-tract level data on pollution exposure and impacts, which can inform decisions about which areas to prioritize.⁷

Additionally, when tracking progress in achieving its net zero target, the City should use key environmental justice indicators to track community environmental health impacts in addition to reductions of greenhouse gases (see suggested amendment 6). The City should engage communities in collectively developing "metrics that are meaningful to them and address how they see their community is being impacted."⁸ Such metrics can include reductions of criteria pollutants (ground-level ozone, particulate matter, carbon monoxide, lead, sulfur dioxide, and nitrogen dioxide)⁹ and the "parity or disparity of benefits and burdens across different populations."¹⁰

For City operations to become net zero, all agencies need to participate in this transition and need to be held accountable. To ensure there is adequate capacity to carry out this net zero transition, the City should assess any additional staffing needs required to implement this ordinance.

Finally, this process must be transparent and participatory. We recommend requiring regular opportunities for residents to learn about the City's progress toward the net zero goal and to share feedback.

Mayor Scott and the Office of Sustainability have already established a goal of reaching carbon neutrality across the city by 2045. City government operations must lead this transition by becoming net zero. We urge a favorable report on 21-0161 with the suggested strengthening amendments.

Sincerely,



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⁶Adrienne L. Hollis. (2021). [Net Zero, Gross Zero, Negative Zero. Simply Put, Which One Is Better?](#) The Chisholm Legacy Project.

⁷ Community Engagement, Environmental Justice, and Health Laboratory. (2017). [MDEJScreen](#). University of Maryland.

⁸ Tamara Toles-O'Laughlin, et al. (2017). [Environmental Justice Toolkit Draft: Guidance to policymakers on incorporating social equity, cultural sensitivity, and community health considerations into air quality, climate, and energy planning](#). Metropolitan Washington Council of Governments. Page 12.

⁹ United States Environmental Protection Agency. (2021). [Criteria Air Pollutants](#).

¹⁰ Talia Lanckton and Subin DeVar. (2021). [Justice in 100 Metrics: Tools for Measuring Equity in 100% Renewable Energy Policy Implementation](#). Initiative for Energy Justice. Page 13.

Suggested Amendments for 21-0161

1. Move up the timeline to 2045 and bring in line with the Carbon Neutral City resolution by setting emission reduction goals of 30% by 2025 and 60% by 2030.
2. Change the definition of "net zero emissions" to limit the use of offsets. Here's suggested language based on [Austin's Climate Equity Plan](#):
 - a. "Net-zero emissions" means all human-made greenhouse gas emissions are removed from the atmosphere through direct reduction and the use of carbon offsets or carbon dioxide removal as needed. For any given year, carbon offsets cannot exceed more than 10% of the city's 2007 GHG emissions baseline level. This 10% should be reserved for sectors where emission reductions are cost-prohibitive or impossible to reduce with existing technology. When carbon offsets are used:
 - i. They should be purchased from projects as close to the Baltimore area as possible.
 - ii. They should be purchased from projects that create additional environmental and equity benefits.
 - iii. Carbon offsets from negative emissions should be prioritized over avoided emissions, and the use of avoided emissions should be phased out by 2040.
3. Add a definition of carbon offsets. Here's suggested language from Austin:
 - a. "Carbon offset" means one metric ton of carbon dioxide equivalent (CO₂e) that is kept out of the atmosphere by either preventing the creation of the emissions ("avoided emissions") or sequestering carbon in vegetation, soils, rock, or water ("negative emissions"). The avoided or negative emissions occur outside of Baltimore and compensate for an equivalent amount of greenhouse gas emissions occurring within Baltimore.
4. Add parameters for what types of carbon offsets will be accepted. Here's suggested language, also from Austin:
 - a. "Carbon offsets must adhere to an approved accounting protocol that ensures the carbon offsets are additional, measurable and permanent, and do not create negative environmental or social impacts. The offsets must also be third-party verified and registered."
5. Ensure that building upgrades, capital investments, etc associated with this bill are implemented in the communities most impacted by climate change and pollution first.

Suggested language:

 - a. On page 3, line 18 after "DEFINED IN CITY CODE ARTICLE 1, § 34-1(E);" add "WHILE ENSURING THAT BUILDING UPGRADES, CAPITAL INVESTMENTS, ETC ASSOCIATED WITH THE NET ZERO TRANSITION ARE PRIORITIZED TO THE

EXTENT POSSIBLE IN THE COMMUNITIES MOST IMPACTED BY CLIMATE CHANGE AND POLLUTION.”

6. Require the use of key environmental justice indicators to track community environmental health impacts. Suggested language from the [Initiative for Energy Justice](#) and [Metropolitan Washington Council of Governments](#):
 - a. On page 4, line 1 before “set criteria and recommend mandatory measures” add “(7) ESTABLISH KEY ENVIRONMENTAL JUSTICE INDICATORS TO TRACK COMMUNITY IMPACTS OF PLAN; AND (8).”
 - b. On page 4, line 5 after “Article 23, § 16-2; and” add “(III) COMMUNITY ENVIRONMENTAL HEALTH METRICS INCLUDING DECREASE IN METRIC TONS OF CRITERIA POLLUTANTS AND THE PARITY OR DISPARITY OF BENEFITS AND BURDENS ACROSS DIFFERENT POPULATIONS; AND (IV)”
7. Assess any additional staffing needs required to implement this ordinance.
8. Require additional transparency and community-based public participation mechanisms to provide input and track progress of the net zero transition. Suggested language:
 - a. The Office shall develop rules and regulations to require additional transparency and community-based public participation mechanisms to provide input and track progress of the net zero transition.