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February 11, 2022

Submitted electronically via email.

Air Pollution Control Commission
Boston City Hall
Environment Department, Room 709
1 City Hall Square
Boston, MA 02201

RE: BERDO Phase 1 Regulations

Dear Commissioners:

The Conference of Boston Teaching Hospitals, on behalf of our 12 member hospitals, appreciates the opportunity to comment on the City of Boston's Phase 1 regulations for the implementation of the Boston Emissions Reduction and Disclosure Ordinance (BERDO).

As you know, COBTH's member hospitals provide the highest quality medical care, in addition to training the next generation of physicians and other health providers, and conducting cutting-edge medical research. We believe that the mission of our teaching hospitals and the City's efforts to reduce carbon emissions are aligned. To that end, we wanted to express our gratitude for the Environment Department's thoughtful and professional approach to developing regulations to implement Phase 1 of BERDO. COBTH submitted comments to the Environment Department on the draft Phase 1 regulations, and greatly appreciated the opportunity to share our hospitals' unique perspective on implementation and workability. We were pleased to see that some of COBTH's feedback was incorporated into the final regulations currently under review by the APCC.

We look forward to continuing to engage with the Environment Department and the APCC as the regulatory process advances, and look forward to the opportunity to provide additional feedback on forthcoming regulations, guidance documents, and reporting forms currently under development. Please do not hesitate to be in touch if there is any additional information we can provide.

Sincerely,

Patricia McMullin
Executive Director
Conference of Boston Teaching Hospitals