



October 25, 2013

Meg Lusardi, Director
 Green Communities Division
 Massachusetts Department of Energy Resources
 100 Cambridge St., Suite 1020
 Boston, MA 02114

Via email: green.communities@state.ma.us

Re: **Green Communities RFI**

Dear Ms. Lusardi:

Thank you for issuing a Request for Information (RFI) inviting comments regarding the Green Communities designation criteria and program funding. The undersigned organizations support inclusion of smart growth and sustainable development techniques as measures that would qualify toward municipalities meeting Green Communities designation criteria. We encourage you to include these concepts in the upcoming regulatory rulemaking process you are planning for the program, where the details of such provisions can be spelled out.

Smart, Sustainable Development: Key Cross-Cutting Measures for Mitigation and Adaptation

We are strong supporters of the Green Communities Program, and believe that the program could have an even greater impact if designation criteria were broadened to include other sustainability goals that affect overall energy use and efficiency – such as green transportation planning that promotes walking, biking and public transit – and zoning measures to support compact, low-impact development. The *Massachusetts Clean Energy and Climate Plan for 2020* and *Massachusetts Climate Change Adaptation Report* recognize the importance of smart and sustainable development as cross-cutting measures that will both help the Commonwealth reach its ambitious targets for reductions in greenhouse gas emissions (GHG) and assist communities in adapting to unavoidable climate change impacts already underway.

Green Communities Qualifying Criteria and Smart Growth

The transportation sector is the largest contributor to GHG emissions in Massachusetts, comprising 39% of the total, followed by building heating and processes (28%) and electricity (24%). Cities and towns can help minimize these emissions by adopting zoning and other land-use regulations that support compact development, including infill and redevelopment in areas with existing infrastructure and open space design zoning as an alternative to conventional residential subdivisions. Enabling people to live, work, and shop in close proximity while providing alternatives to single-occupancy vehicle travel reduces transportation emissions. Compact forms of development can also reduce per-person building-related energy consumption while preserving forests that sequester carbon and farmlands that provide local food sources. Landscaping standards in local subdivision and site plan review rules can maximize retention of trees and other native land cover as well as encourage planting of trees in a manner that reduces building heating- and cooling-related energy consumption. Local governments can also ensure that development minimizes impacts on water resources and the energy expenses associated with water supply and treatment. For example, Low Impact Development (LID) techniques can maintain natural hydrology and water quality while utilizing rainwater as a source for landscape irrigation rather than a waste product. Local wetlands protection bylaws and ordinances can assure that wetlands and open spaces continue to play critical roles in preserving water quality while performing climate change mitigation and adaptation functions.

Therefore, we encourage you to include sustainable development practices as eligible activities for communities to adopt for credit toward meeting and retaining Green Communities designation. As suggested in the RFI, provisions for meeting Criterion 3 could include water conservation, transportation planning, and reduction in consumption of land and water resources. Qualifying actions could include sustainable planning and zoning measures such as those described in the Executive Office of Energy and Environmental Affairs *Smart Growth/Smart Energy Toolkit* <http://www.mass.gov/eea/ma-smart-growth-smart-energy-toolkit.html>. Several of these techniques could also apply to Criterion 5, regarding building standards for new construction that reduce life-cycle energy costs. Compact development and appropriate tree planting and landscaping can help reduce life-cycle energy costs.

Water Conservation and Efficiency

The RFI also asked whether water savings measures should be eligible for Green Communities funding. We support inclusion of water conservation and efficiency measures as qualifying for funding, to the extent such programs go beyond basic repair or replacement of aging infrastructure and will help the communities reach their GHG reduction targets. Furthermore, since climate change is expected to result in hydrologic impacts including both more intense storms and more frequent droughts, it is critical that communities adopt every feasible measure to conserve water and manage stormwater with LID.

Conclusion

Land use plays a critical role in energy consumption, and land use is controlled in Massachusetts primarily through local government. In order to provide jobs and housing in a more energy-efficient manner, communities need to update their local land use plans, zoning, and regulations. The Green Communities program can create incentives for these important local initiatives through the designation qualification and recertification processes and grants.

Sincerely,

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Mass Audubon

John Dieckmann, Vice President
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