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2020

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Dear Climate Council,

GrowSmart Maine appreciates the extensive work of the Climate Council Working Groups and supports the recommendations as consistent with our work and mission.

As an organization focusing on the interconnections among many of these strategies, GrowSmart Maine offers below an extensive array of ideas drawn from our board's collective experience and varied perspectives.

With the multiple challenges facing our state at this time, we hope the Council will choose to proceed broadly and boldly, transforming the challenge of climate change – along with our myriad other challenges – into opportunities. Toward this end, we have asked our board to respond with creativity and innovation, drawing on their individual expertise for pragmatic and innovative solutions.

We appreciate this opportunity to weigh in on the draft recommendations and have done so by first recommending a method of prioritization, and then commenting on each set of issues addressed by the Working Groups.

Prioritization of Strategies

Looking for the common themes that span multiple sets of issues could be a useful method of prioritization, identifying those solutions that will affect change in the greatest number of areas of concern. For example, major categories that align with smart growth are environment, community and economy. To help identify easier, low-cost solutions first, look for long-term economic benefit that is fiscally manageable, and considers economic, fiscal, and social ROI of associated costs. This will also provide an equity check. Some sample questions to test importance include:

- Does it mitigate climate change?
- Does it protect/enhance Maine's natural resources?
- Does it improve quality of life for citizens across all incomes, education levels, gender, race?
- Does it provide economic opportunity for Maine?
- Where does it rank in terms of cost for the next 10 years/20 years?

Challenge the state to think about whether the existing structure of the executive branch focuses on the challenges of our time. The report-outs don't appear to consider (at least on a large scale) a reorganization of state departments/bureaus to tackle climate change or other issues. The Brookings Report, commissioned by GrowSmart Maine a decade ago, spoke of the need to have a structure that

best organizes people to meet current challenges. The Office of Policy Innovation and Future is uniquely positioned to help direct a restructuring that may reduce the size and expense of the government while focusing on a few key proactive challenges.

Maine's pledge is the most aggressive in New England. Those ambitions require outcomes and action immediately. The urgency of the COVID-19 pandemic and the economic recovery demand that climate action happen in tandem with these efforts.

All of the topics call for developing educational materials. Consider the strength of an umbrella "brand" – and acknowledge interrelated consequences as an important priority.

Below are specific suggestions from our board in categories relevant to smart growth.

Buildings, Infrastructure & Housing

Strategy #3 -- Recommendations to Mitigate Emissions and Support Resilience in Maine Buildings -- focuses on energy efficiency of existing buildings. This is important, yet in addition, **recommendations must recognize the climate resiliency value of reuse of existing buildings, beyond simply reuse of materials in new construction.** The state's historic rehabilitation tax credit has proven its value for economic and community resiliency. It also supports rehab and reuse of existing buildings, with the climate advantage of repurposing embedded carbon in those materials compared with both demolition and new construction.

Adaptive Reuse

Adaptive reuse uses the embodied carbon of existing buildings to not just improve efficiency, but to make them healthier, creating supportive environments which overlap with Resiliency, Public Health, and Energy. If focused in downtowns or more walkable rural hubs, these reuses of existing buildings will also positively impact transportation by improving walkability.

While the report recommends the use of construction materials with embodied carbon, it does not appear to make a priority of it. Adapted reuse is a strategy that limits the carbon footprint, but sequestration strategies work to pull carbon out of the atmosphere. **There is an urgency in the need to slow climate change that calls for more proactive measures. The use of bio-based construction materials can also be an economic benefit to Maine. Increase of R&D funding to the university system to expand their research in new materials is a key recommendation here.**

An added benefit of this sort of program is that it could be made to add resiliency to existing housing stock without dependence on developers and large-scale property owners/landlords. There is so much more [than weatherization] needed to bring the aging housing stock up to usability such that it serves the needs of the population to support and empower individual homeowners to do more.

Public Funding

Public funding should be tied to smart locations of new buildings – e.g., school funding still seems to encourage newly constructed schools to be on the edge of town with a big vehicle drop off loop, rather than in a walkable neighborhood where buses and cars still have access but are not the tail wagging the dog.

Building Codes/Affordable Housing

Streamlining developers' permitting processes and reducing the cost of permitting has long been understood as an effective way to incentivize building in specific, denser locations where these benefits would be in force. **This strategy works for both commercial and residential construction, and the creation of density in community-approved locations contributes to walkability and reduces vehicle emissions.** (So this is pertinent to transportation as well.) Municipalities should be provided with templates so this can be implemented as a land use planning tool.

Additionally, while GrowSmart supports uniform building and energy codes, the emphasis on green and safe buildings, while clearly a good thing, can also be in direct conflict to the need for affordable housing. **How do we streamline adoption of building codes and other regulations to focus on sustainability (for planet + people) and energy conservation side-by-side with reducing the cost of construction? Approaching building codes with this perspective would yield benefits to all.**

Maine should broaden affordable housing calculations to take into account not only mortgage/rent, but also transportation and energy/utility costs. This broader view would reshape how Maine Housing and the public view what is affordable. This builds on the current thoughts on how housing funds are awarded -- location matters, as does lifetime energy costs.

The recommendations tend toward Behind the Meter interventions, which are related to the buildings themselves, not the location/land use decisions related to siting new buildings/facilities. There is opportunity to get upstream for greater impact. As part of this, look at ways to incentivize combined heat and power generation (also pertinent to the Energy section).

Statewide building codes could lead to regional or state-level building inspectors. Compliance, training, and staffing are significant costs to communities and could be regionalized. Small town exceptions to MUBEC could be reduced or eliminated with regional inspection capacity.

Building codes should consider additional requirements, such as installing solar panels on all new buildings, as implemented in California. Recommendations include getting PV/EV ready, but orientation of rooflines might be important to consider too.

Community Resilience Planning, Public Health & Emergency Management

This category has strong ties with Buildings, Infrastructure & Housing – by providing supportive built environments, we lift the public health of communities, including psychological health. With greater partnership between these complementary silos, there is huge potential for moving the needle. GrowSmart Maine addressed these links in Maine at our 2019 Summit.

Planning

Maine is due for a major overhaul of the Growth Management statute. This should include more emphasis on Future Land Use planning (looking ahead) and helping municipalities with implementation, with less emphasis on statistics and chasing data (looking back). This has been looked at several times over the last 10-15 years by the state and its non-profit partners and is an area where GrowSmart could lead. **In general, comprehensive planning is expensive for municipalities and can take much time. How can this process be improved through streamlining and making resources (templates, for example) available to municipalities? This is also an excellent opportunity to emphasize and incentivize the benefits of regional planning while still maintaining communities' right to municipal home rule.**

The certification process where the state makes sure regional and state goals are addressed is valuable, but there is no capacity for follow-up and support, which is key especially since in many rural towns the comprehensive plan process is undertaken by volunteers.

There should be more incentives (and some penalties) in regard to eligibility for technical assistance and funding, related to implementation. Planning is a worthwhile community building activity, valuable in its own right, but the ultimate goal has to be implementation – change that make a difference.

Building Standards

The importance of building standards was made clear by the Buildings, Infrastructure & Housing group. **Standards for buildings, public spaces, municipalities/communities and organizations to positively impact human health and well-being already exist: (WELL, Fitwel, Living Building Challenge, Assembly).** A bold move would be incentivizing adoption of these in parallel to the Efficiency Maine model for energy savings.

Transportation

Reduction of miles traveled through more strategic and thoughtful land use is smart growth. Since land use is the purview of municipalities, this is not a problem that can be solved by transportation agencies, but should be at the forefront of incentives provided by the state for comprehensive planning purposes.

More, we need to lean in hard to encourage/incentivize businesses to continue remote work as is currently being done, for as much of the workforce as possible for at least part of the work week. We expect this will significantly reduce vehicle emissions and reduce long-term road maintenance costs from wear and tear on existing roadways. Creating employee tax incentives for Work-From-Home remote equipment needs would help with equity of work from home feasibility for smaller businesses.

Additional planning-related actions include forward-looking infrastructure investments such as disincentivizing non-resilient infrastructure practices (such as cul-de-sacs, etc.) and **moving away from auto-centric design wherever possible, such as urban school locations (see above).**

An action that would immeasurably help to support access to suburban/rural public transportation involves ensuring that buses will have an edge during peak travel times: **whenever a new road is created or an existing road is expanded (using MaineDOT or Maine Turnpike Authority funds), new infrastructure should include facilities for bus-only lanes to be used now or in the future. Otherwise we are locking ourselves out of efficient bus transport in congested rural, suburban and urban corridors.**

Natural & Working Lands

Strategy #1 states we should, “Protect and conserve working and natural lands and water through a dedicated, sustained funding source to support a robust forest products and agricultural economy, increase carbon storage opportunities, avoid future emissions and enhance climate adaptation and resilience.” **GrowSmart Maine fully supports this goal, and notes the critical need to include access to fisheries.**

Energy

Energy conservation is the best clean energy and this should be a high priority.

Maine needs an energy grid based on distributed generation. Transmission projects (for electricity or pipelines) are expensive and increasingly subject to disruption. We should consider incentivizing solar panels on all roofs and battery storage at all properties so that new properties could opt out of being connected to the grid.

Electric vehicles have a strong focus in the plan: **We should target rural and suburban incentives for electric/hybrid vehicles, as these are the places where overnight plug-ins will be easiest to adopt.** Towards that end, incentivize/require businesses locating in non-urban areas to install charging stations for employees. Begin by phasing in the requirement that all businesses, regardless of location, should be installing at least one station, scaling up based on number of employees/customers. Community-based stations would be allowed.

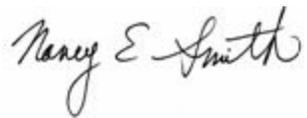
Coastal & Marine

There is a strong overlap here with community resilience planning: we need to encourage infrastructure adaptations: nature-based solutions/models such as green infrastructure. One radical idea is to reverse grandfather (10-30 years) residential/commercial building on land that will be directly affected by sea level rise and storm surge. To some this sounds obvious but building is still happening in these locations on a regular basis. We need to expand flood zone/shoreland zoning to not only look at areas that have been subject to flooding, but areas that are likely to be subject to flooding. Allow no more buildings in areas likely to be flooded in by 2050 unless built for those conditions.

Consider the benefits of zero tax dollars being invested in rebuilding areas affected by sea level rise and storm surge, including sea walls and seaside road repairs. We have to start talking about when to sunset this NOW. Tax dollars are better focused on movement or adaptation of threatened utility infrastructure.

We at GrowSmart Maine thank you again for your hard work and excellent recommendations. We hope you find our ideas to be useful as we move toward implementation.

Sincerely,

A handwritten signature in black ink that reads "Nancy E. Smith". The signature is written in a cursive style with a large initial 'N' and 'S'.

Nancy E Smith
Executive Director