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COMMENTS TO BE SUBMITTED VIA ONLINE FORM BY FEBRUARY 22, 2021

In response to the Massachusetts Executive Office of Energy and Environmental Affairs' request for public comments on the interim 2030 Clean Energy and Climate Plan (CECP), the Town of Berlin offers the following:

Comments from the Town of Berlin Agricultural Commission:

One of the observations that has come out of the COVID-19 pandemic is the recognition by consumers and officials for the need for more locally sourced food.

This past season, the farming community stepped up to this challenge by providing lots of fresh vegetables and fruit. If this trend continues, there more than likely will be the need for more greenhouses in this state. Most greenhouses are currently heated with fossil fuels such as fuel oil, natural gas and propane. Chapter 3 of the CECP identifies the need for a widespread deployment of heat pumps for households and other buildings to meet the greenhouse gas emission objectives. Based on the current technology, the Commission does not believe that heat pumps are practical for heating greenhouses.

Although the report acknowledges that agricultural activity in Massachusetts is much smaller than states like California, it would seem appropriate that the report should recognize the potential expansion of agriculture and greenhouses in this state and address what heat sources would be appropriate.

General comments on the CECP's Strategy Actions:

T1 Strategy Actions: The Town of Berlin's Complete Streets Tier II Prioritization Plan and Master Plan memorialize the community's desire to increase safe pedestrian and bicycle access in the coming years. This aligns well with the Commonwealth's proposed investment in clean transportation strategies; specifically, the Transportation and Climate Initiative Program's (TCI-P) proposed investments in improved public transportation, safe bike and pedestrian infrastructure.

T2 Strategy Actions: As a designated Massachusetts Green Community, the Town of Berlin continually strives to achieve energy efficiency and reduced carbon emissions. Zero Emission Vehicles (ZEVs) require a higher up-front investment than traditional vehicles, which has prevented many municipalities from investing in these highly efficient vehicles. Berlin has

begun a police vehicle replacement program comprised only of hybrid front-line vehicles and our Police Chief's car is an electric vehicle. Municipalities with limited financial resources will need access to rebate and incentive programs to comply with the MassDEP's adoption and implementation of:

1. the California Advanced Clean Cars II Standard (all new LDV sales must be 100% ZEV by 2035) by the end of the year in which the standard is finalized by California.
2. the ZEV purchase mandates of the California Advanced Clean Trucks rule by Dec. 31, 2021 and the Advanced Clean Fleets rule by the end of the year in which the rule is finalized by California, and
3. the multi-jurisdictional Zero Emission Medium- and Heavy-Duty Vehicle Memorandum of Understanding and Action Plan to provide a framework for achieving 30% of all new truck and bus sales being ZEVs by 2030 and 100% by 2050.

T3 Strategy Actions: As noted above, continued rebate and incentive programs, including the Massachusetts Electric Vehicle Incentive Program (MassEVIP) and the Massachusetts Offers Rebates for Electric Vehicles (MOR-EV) program administered by the Department of Energy Resources, will be critical in mitigating the cost burden for private consumers, municipalities and other public agencies.

T4 Strategy Actions: The Town of Berlin intends to install EV charging stations at its Public Safety Complex and Town Offices for the benefit of residents. Efforts by the Commonwealth to assure EV charging financial viability through various incentive programs and restructuring of utility demand rates will improve residential and public agency movement toward EV purchases. Additionally, as noted in T5 Strategy Actions, efforts must include raising consumer awareness and providing technical assistance opportunities.

B1 & B2 Strategy Actions: A phased approach and municipal stakeholder involvement are both critical to DOER's implementation of any new proposed high-performance stretch code, building envelope retrofit and clean heating system standards. Municipalities, the building design and construction industry, and consumers must be given sufficient time to transition to the enhanced standards.