



December 3, 2014

Attn: Brian Swett  
Chief of Environment and Energy, City of Boston  
Environment, Energy, & Open Space  
1 City Hall Square - Room 603  
Boston, MA 02201

Dear Mr. Swett:

LISC, the Massachusetts Association of Community Development Corporations and the undersigned Boston community development corporations (CDCs) strongly support the City of Boston's Climate Action Plan (CAP) released November 12, 2014 for public comment. CDCs and Community-Based Organizations (CBOs) are well positioned to help the City meet and exceed its goals on energy efficiency, renewable energy, and neighborhood resiliency efforts. The CAP emphasized cross-cutting themes such as social equity, economic development, and public health and safety; all of these themes are part of the core day-to-day work that CDCs carry out in the City's neighborhoods.

The CAP outlined some ambitious goals such as increasing the number of energy audits to 72,000 and weatherizations to 36,000 by 2020. While our state has some of the best utility programs in the country, the sheer number and complexity of the programs makes them difficult to navigate. Within a neighborhood context, a CDC could help people connect to the following programs: Mass Save 1-4 family and multifamily, Renew Boston's Whole Building Incentive, ABCD's 1-4 family low-income program and multifamily program, NSTAR's Direct Install Program for Small Businesses, and Solarize Boston programs.

While CDCs are well positioned to help the City achieve its CAP goals, it is important to highlight that most CDCs do not have a single full-time or part-time employee dedicated solely to energy efficiency or sustainability. There is a strong need for new incentives for CDCs and CBOs to help accelerate energy efficiency, renewables and resiliency efforts. Whether these are neighborhood competitions or the City working with the utilities to create mechanisms that incentivize neighborhood groups to do this work, there's an opportunity to unlock untapped potential and accelerate these efforts in Boston neighborhoods. Beyond providing new incentives that will help offset CDC staff time dedicated, the City could help coordinate and foster volunteer efforts with CDCs and groups such as faith based institutions, the business community, Boston Cares, BCAN, USGBC, and our numerous higher education institutions. Promoting peer-to-peer learning is critical so neighborhood leaders don't feel as if they have to be experts in the field in order to promote energy efficiency and renewable efforts.

CDCs and CBOs are interested in piloting climate preparedness/resiliency issues and pursuing net zero or E+ developments. It is critical for CDCs to have a better understanding of what resources the City is willing to offer in pursuing these goals collaboratively. New and improved financing programs will be important in accelerating this work; however, the key is understanding the strengths and limitations of

these programs. For example, PACE financing may be a terrific option for a large manufacturer that seeks energy efficiency improvements, but PACE is currently ill-suited for multifamily affordable housing owners that utilize federal financing programs. However, we are interested in understanding how on-bill repayment for efficiency improvements could work well. We look forward to working collaboratively with the City to improve utility programs and state incentives.

In conclusion, CDCs are vested in pursuing a long-term strategy to provide more housing and jobs in Boston's neighborhoods- particularly near transit. CDCs and CBOs have the trust of their respective communities and maintain relationships with numerous institutions within their neighborhoods. Going forward it will be critical to strengthen incentives available and facilitate partnerships that make it easier for these organizations to help the City meet and exceed its goals outlined in the CAP.

Sincerely,

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Joe Kriesberg.  
Executive Director, MA Association of Community Development Corporations

David Price  
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