



Town of Stow  
**PLANNING DEPARTMENT**

**380 Great Road  
Stow, Massachusetts 01775-1122**

(978) 897-5098  
FAX (978) 897-2321  
planning@stow-ma.gov

**To:** Green Advisory Committee  
**From:** Valerie Oorthuys, AICP- Planning Director, Michael Slagle- Land Use Planner  
**Re:** Draft Climate Action Plan  
**Date:** February 6, 2024

The Planning Department would like to offer the following comments on the draft Stow Climate Action Plan, dated January 5, 2024. We recognize the Green Advisory Committee's tremendous efforts to create the first CAP for Stow and the commitment to reduce local greenhouse gas emissions by 36% by 2030.

#### **General**

- Organization and Formatting – Throughout the document, key points and statistics could be better visually displayed to convey hierarchy of the information provided and allow the reader to more easily digest the data.

As one example, perhaps the “How to Navigate the Stow Climate Action Plan” section could very clearly highlight the overarching goal of the plan as well as clarify the audience, which we assume to be those working for and with the government of Stow. Also, the “How Does Climate Change Impact Us Locally” section includes a number of interesting and key data that could be pulled out and highlighted to better grab the readers’ attention and provide context for the purpose of the Plan.

Additionally, we recommend merging the sector outlines and their corresponding action plans so that the Plan is more user-friendly.

- Community Engagement – We suggest separating the “Climate Action and Community Engagement” in order to better define actions taken to date and the community engagement associated with the drafting of this Plan. Further detailing the engagement and outreach associated with the CAP will bolster community trust of the recommendations in the Plan. While we were unable to view the appendix with the survey results, a visual snapshot of that feedback would be appropriate to add into the body of the CAP. The number of survey results is fantastic and exceeds the Planning Department’s typical number of responses. Who responded to the survey? What were their main concerns? Are there specific challenges respondents noted related to personal actions or municipal actions? Which goals or strategies were directly influenced by residents’ responses? Examples from the CAPs from the Towns of Action, Concord, and Wellesley could provide a useful template.
- Depending on the audience of the document, consider the addition of a section on governance to detail actions that can be taken specifically by the municipality. This could include bylaw

and policy updates that are needed, regional collaboration, ongoing implementation and support of the CAP, ensuring other planning processes intentionally consider recommendations within the CAP, and strengthening the Town's partnerships.

- Consider whether a discussion on waste management should be incorporated into the Plan. Through our Comprehensive Plan process to date, we have heard mutterings of interest in municipal waste collection, in addition to composting or recycling. We would be interested to know the Green Advisory Committee's thoughts.
- A handful of the links in the footnotes seem to be broken, including the Energize Stow website, Stow's Municipal Vulnerability Preparedness Plan and the Town Plans linked on page 6.
- Consider noting the regional and statewide plans that complement Stow's CAP on page 6. Stow's Hazard Mitigation Plan could be listed here as well.
- Consider adding data from Resilient MA or the discussion of hazards specific to Stow within the MVP Plan to strengthen the discussion within the section titled "How Does Climate Change Impact Us Locally"

## **Buildings**

### *Increase utilization of heat pumps and energy efficiency in existing residential buildings*

- Consider adding a task regarding providing information, training, and incentives for local developers and contractors to build to net zero standards.
- The Planning Board has heard feedback regarding the Accessory Apartment zoning bylaw that could be incorporated here. The CAP could suggest amending the definition of an accessory apartment so that the allowable square footage is not noted as gross floor area but rather gross living area. This way, residents would be encouraged to add additional insulation to an accessory apartment without this measure directly limiting the size allowed.
- Consider a recommendation to eliminate zoning and permitting related barriers to the installation of heat pumps within residential set-backs.

### *Improve utilization of heat pumps and energy efficiency in existing municipal, commercial, and industrial buildings*

- Consider repeating the implementation task under B1 item 3 so that this group is informed of potential incentives.

### *Create and track metrics to determine progress*

- If it is not possible to create metrics through the CAP process, we recommend a review of other CAPs developed in the region to kick start this task. The below example from Wellesley's CAP may offer a useful example:



## PERFORMANCE INDICATORS

| Metric  | Baseline (Year)  | 2030 Target  | 2050 Target  |
|---|--|--|--|
| GHG emissions from building sector by building type (MTCO <sub>2</sub> e) | Metric tons CO <sub>2</sub> /yr<br>Residential: 83,008 (2020)<br>Commercial: 25,527 (2020)<br>Municipal: 3,982 (2020)<br>Colleges: 22,559 (2020) | -17%   | Net zero   |
| Average EUI by building sector (kBtu/square foot/year)                    | Residential: 65 (2020)<br>Commercial: 104 (2020)<br>Municipal: 64 (2020)<br>Colleges: 115 (2020)   | 55<br>83<br>58<br>Downward trend                             | 30<br>40<br>30<br>Downward trend                               |
| Percent of new all-electric buildings developed                           | New Metric   | 100%   | 100%   |
| Number of existing buildings converted to all-electric                    | New Metric   | Residential: 8,934<br>Commercial & Municipal: 313            | 9,247 (100%)   |
| Number of existing buildings weatherized                                  | New Metric   | Residential: 2,234 (25%)<br>Commercial & Municipal: 47 (15%) | Residential: 6,701 (75%)<br>Commercial & Municipal: 313 (100%) |
| Number of participants in rebate and other incentive programs             | Residential: 960<br>Commercial: 18   | Upward trend   |  |
| Number of commercial buildings reporting annual energy use                | New Metric   | 120  | 276 (100%)   |

### Transportation and Mobility

We recommend the goal of this sector to be revised to encompass all low and zero emissions transportation options. As stated, the goal appears to be limited to personal vehicles which we understand as only one part of a larger picture of climate friendly mobility. Further, there are no implementation tasks associated with Action 3: Encourage alternative modes of transportation.

In stating this, we recognize that as a developing suburb, the majority of residents in Stow are car-bound. However, we effort to vision Stow as a community in which residents can reduce local vehicular miles travelled.

- The second bullet point under Climate Impacts/ Considerations appears to favor owner-occupied single-family homes, which we recognize as a land use pattern that is a leading contributor to an increase in vehicle miles travelled. In expanding the goal of this sector, it would be helpful for the Plan to recognize the positive climate impacts of mixed-use development and development of multi-family housing. In our current efforts to update the Housing Production Plan, residents have provided feedback related to the creation of neighborhoods that are in proximity to local amenities, such as businesses and town services, and connected to those amenities via sidewalks, bike lanes, rail trails, and other networks.
- Staff are happy to assist with providing clarifications and additional items under the Actions To Date section. Notably, references are missing related to the Council on Aging van service, Go Stow program, and efforts related to the Track Road Assabet River Rail Trail connection.
- Staff are happy to assist with providing clarifications to the description of M3: Encourage Alternative Modes of Transportation on page 63 to describe the implementation of Complete Streets projects.
- Consider whether the CAP should include a recommendation related to sidewalk plowing.

- Action item 1: Accelerate the Adoption of EVs and PHEVs mentions three specific sites to install EV charging stations. How were these housing developments selected and prioritized? If the Planning Department is intended to “investigate potential locations for charging stations” it would be helpful to understand how GAC prioritizes locations.
- Action item 2: Develop plans to transition municipal vehicles to EVs or PHEVs includes implementation tasks that focus on the Council on Aging and providing charging stations at schools. This item could be expanded to include the police, fire, highway, and facilities’ fleets (other than the types of vehicles that don’t currently have an EV or PHEV option).
- Additional action items and associated implementation steps we recommend:
  - Reduce local vehicle miles travelled
    - Support Complete Streets initiatives at Town Meeting and provide letters of support to associated grant requests
    - Work with the Nashoba School District to partner with the Commonwealth’s Safe Routes to School program
    - Advocate for the development of “Complete Neighborhoods” including multi-family development and sidewalk construction
    - Advocate for Stow connections to the Assabet River Rail Trail and the Central Mass Rail Trail
  - Promote low-impact transportation options
    - Evaluate and advocate for locations for a potential bike share program
    - Support expansion of existing shuttle services and promote their services
    - Advocate at Planning Board and Zoning Board of Appeals public hearings for the inclusion of sheltered bike racks and construction of sidewalks and bike facilities
    - Reduce community-wide vehicle idling through education and ticketing

## Energy

*Provide Clean, reliable and affordable electricity which is sufficient to meet higher demand*

- Consider a recommendation to partner with HL&P to explore the feasibility of a tax program for the placement of underground utilities in order to increase the Town’s climate resilience in the face of strong storms.

## Natural Solutions & Adaptation and Resilience

The discussion of these two sectors should be strengthened. In particular, the Action Plan for Natural Solutions leans on the Open Space and Recreation Plan and the Adaptation and Resilience refers solely to the Municipal Vulnerability Preparedness (MVP) Plan without the inclusion of a corresponding Action Plan. Perhaps there are specific items from those Plans that can be restated here. We’ll note the MVP was finalized in 2018, so perhaps there was resident feedback from the CAP survey that could assist in providing a more current direction for these sectors’ associated Action Plans. Are there recommendations in those Plans that GAC would like to see implemented in a different way or under a different timeframe?

Please see the following comments regarding the Priority Actions for Adaptation and Resilience:

- If the intent is to include all “Top Recommendations” and “Highest Priority” recommendations from the 2018 MVP Plan, consider the inclusion of “encourage LID implementation” and “assess and make repairs to high priority hazard dams”.
- Consider restating “update bylaws to require multiple access routes for new development” to mirror the intent as described in the MVP Plan: “decrease isolation of neighborhoods by adding bylaws requiring multiple access points to new developments, in the event of road closures”.

This may clarify that the purpose is to consider whether a secondary emergency access is needed, rather than to require multiple points of access for all new subdivisions. In the MVP Plan, this item also refers to the potential for implementing bylaws to require emergency generators at developments with individual private wells.

These sectors should include a discussion of stormwater management and erosion control. Please consider the following items:

- Provide education around residential, commercial, and industrial water conservation
- Provide education for residents, businesses, and institutions around the protection of biodiversity and electrification of landscaping equipment
- Minimize stormwater runoff
  - Exploration of potential zoning bylaw amendments to improve stormwater regulations, and strengthen the protection of wells and septic systems, particularly in the Lake Boon neighborhood
  - Ensure the Town is in compliance with the Massachusetts Small MS4 General Permit

Regarding Actions To Date, staff can assist in providing a more robust description of the Climate Resilience Master Plan effort underway at the Stow Acres North Course.

Thank you for the opportunity to provide feedback on the draft Climate Action Plan. Please consider holding a second round of comments to allow more time for input on any additional goals or action steps included. As always, staff are happy to assist with providing any specific language needed or discussing any of the above comments further.