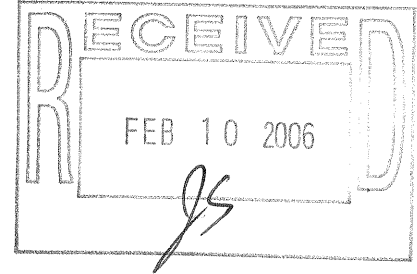


Mr. Jay Szklut, Planning and Economic Development Manager
Homer Municipal Building, Town Hall Complex
19 Moore Street
Belmont, MA 02478



February 8, 2006

Dear Mr. Szklut:

Sustainable Belmont, a subcommittee of the Belmont Vision 21 Implementation Committee, wishes to submit comments regarding the pending Comprehensive Permit Application for the Residences at Acorn Park (hereafter referred to as the "Belmont Uplands Development" or "Development"). Sustainable Belmont respectfully requests that you submit this letter detailing our comments to the Belmont Zoning Board of Appeals (ZBA) on Sustainable Belmont's behalf.

Although the Development would increase the percentage of Belmont's affordable housing units, Sustainable Belmont requests that the ZBA impose the following conditions prior to approving the Comprehensive Permit Application for the Development.

First, Sustainable Belmont requests that the Development be built using integrated design and high-efficiency, sustainable standards. Sustainable buildings use energy, land, water, and materials more efficiently than buildings simply built to code. Such buildings also reduce the amount of hard, impervious surfaces to minimize water runoff, and use effective placement of landscaping and natural vegetation for shelter and shade to complement heating and cooling systems and to lower water usage. High-performance sustainable buildings, which exceed Energy Star standards, are beneficial for the environment and are cost-effective over their lifetime.

What additional benefits might sustainable building methods produce? Green Communities, a national green building program dedicated to affordable housing, notes that more than four million children in the U.S. have asthma and 40% of doctor-diagnosed asthma cases among children is attributable to irritant exposure in a residential setting. New England has the highest regional rate of adult asthma in the nation and recent research suggests that environmental pollutants contribute to onset of asthma, according to the New England Asthma Regional Council. Natural light and better air circulation—two components of green building design—promote health and comfort for occupants.

Sustainable Belmont would point out that building the Development as a high-performance project would not impose an economic hardship on the developer of the Belmont Uplands Development and, in fact, might be less expensive to build.

Case study: The Codman Square Neighborhood Development Corporation, working with the Hickory Consortium, completed construction of 50 units of new affordable housing in Dorchester, Massachusetts, in 2000. This project, the Erie-Ellington Homes, used a holistic systems approach that exceeded the U.S. Department of Energy and Environmental Protection Agency Energy Star requirements. It combined water efficiency measures, an enhanced ventilation and air circulation system, and low-VOC carpets and paint (which

improved indoor air quality), and cost an estimated 20% less than building comparable urban housing in the Boston area. Additionally, after several years of occupancy, Erie-Ellington Homes had 50% lower utility costs compared with standard construction. If energy costs and water/sewer rates continue to escalate, both the developer and the residents will reap additional monetary benefits over the entire lifetime of the housing unit.

Second, Sustainable Belmont requests the ZBA to obtain a qualified peer review of the integrated design, energy efficiency, and sustainable components of the proposed Development and to ensure that performance standards and measures of accountability for environmental efficiency and sustainable use of resources are built into the design and construction of the Development. Building to Leadership in Energy and Environmental Design (LEED) standards, for example, would guarantee that such sustainability measures were implemented and also promote the positive attributes of high-performance buildings.

Additionally, Sustainable Belmont notes that the Town of Belmont has incorporated energy efficiency and other sustainable elements into its own new building design and construction in recent years: Two fire stations currently under construction, the new Wellington School, and Belmont's new Senior Center (proposed to be built to LEED standards). And, in 2005, the Town hired an energy services company to implement conservation measures in 12 municipal buildings, which will yield an estimated \$200,000 in annual savings. Therefore, Sustainable Belmont is only asking the ZBA to require the developer of the Belmont Uplands Development to incorporate energy efficiency and sustainability measures that the Town itself is already doing.

Sustainable Belmont asks that the ZBA consider the cost of utilities, especially for residents of affordable housing, for whom paying the escalating cost of these services is an increasing economic burden. Currently, Massachusetts citizens pay the third highest energy prices in the United States, according to the U.S. Department of Energy, and government forecasts regarding pricing of energy supplies do not indicate relief any time soon.

Short-term Energy Outlook: January 2006 temperatures were 27% warmer than average across the United States. Yet, U.S. households who heat with oil are expected to pay an average 16% more this winter than during the 2004-2005 heating season and households who use natural gas for heat will pay an estimated 24% more. Low world spare oil production capacity and rapid world oil demand—China's demand for oil grew 15% in 2004 and its need for imported oil will double between 2003 and 2010—suggests that above average costs for heat may continue to rise. (Massachusetts Municipal Association, November 1, 2005; U.S. Department of Energy, February 7, 2006).

Long-term Energy Outlook: Due to supply constraints, limited production capacity, and continued world demand, the cost of a crude barrel of oil is forecast to increase from an average \$40.49 in 2004 dollars to \$54.08 in 2025 and to \$56.97 per barrel in 2030. (U.S. Department of Energy, December 2005). If such forecasts come to pass, it especially makes economic sense to build new construction to optimal high-performance energy standards.

Water/Sewer: The Massachusetts Water Resources Authority (MWRA) found that the estimated annual household charges for combined water/sewer rate (based on 90,000 gallons usage per household) in the 21 core communities it serves rose from \$681 in Fiscal Year 2000 to \$886 in Fiscal Year 2005. Because charges differ by community, the average annual charge for the water/sewer rate for Belmont in Fiscal Year 2005 was \$1,453 (*5-Year Progress Report: 2000-2004*, the most recent report available). Then, on February 3, 2006, the MWRA proposed its steepest rate hike in 10 years for Fiscal Year 2007. If approved, on July 1, 2006, the average annual combined water/sewer bill in Belmont will increase another 11.3%. Water efficiency and water conservation should be an important consideration in the design and construction of the Development.

In conclusion, with the financial, environmental, and health benefits that high-performing, sustainable buildings employ, Sustainable Belmont respectfully believes that NOT building to such standards, especially for housing intended for residents who live within income restrictions, is unconscionable. At an absolute minimum, the Development should be built to Energy Star standards.

Thank you for allowing Sustainable Belmont to offer these comments on the pending Comprehensive Permit Application for the Residences at Acorn Park. Sustainable Belmont endorses the Permit Application, with approval subject to the conditions contained within this document.

Respectfully submitted for Sustainable Belmont,



Jan Kruse
Co-chair, Sustainable Belmont



Heather Tuttle
Co-chair, Sustainable Belmont

cc: Belmont Planning Board; Vision 21 Implementation Committee