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## City of Dover, New Hampshire

DEPARTMENT OF PLANNING AND COMMUNITY DEVELOPMENT

**RECEIVED**

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**OFFICE OF ENERGY  
AND PLANNING**

City of Dover Energy Commission  
288 Central Avenue  
Dover, NH 03820

July 16, 2014

Meredith Hatfield, Director  
NH Office of Energy and Planning  
Governor Hugh J. Gallen State Office Park  
Johnson Hall, 3rd Floor  
107 Pleasant Street  
Concord, NH 03301

**Re: City of Dover Energy Commission Response to NH Draft State Energy Strategy**

Dear Director Hatfield:

The Dover Energy Commission provides educational outreach to the public and spearheads specific energy-related projects for the benefit of the City of Dover. In addition, it advises other boards and committees on sustainable practices such as energy conservation, energy efficiency, and energy generation. Through energy savings measures implemented in City facilities and buildings, spurred by the 2008 Dover Energy Action Plan, the City of Dover is projected to achieve savings of \$3.6 million over ten years and significantly reduce overall impact to the environment. The Commission continues to explore new options for cleaner and more efficient energy.

The Dover Energy Commission has reviewed the NH Draft State Energy Strategy, and our member representatives attended the June 24<sup>th</sup> OEP meeting presenting the plan at Pease International Tradeport in Portsmouth, NH. We appreciate this opportunity to provide this input, and encourage OEP to continue to coordinate with local energy commissions- and to provide support to the local commissions in the implementation of the finalized plan.

We provide the following constructive feedback to the draft plan based upon our review:

The current draft of the State Energy Plan lacks reference to the inherent connection to climate change. The emissions of greenhouse gases from the combustion of fossil fuels directly impacts the rate and extent of climate change that will impact our state's environment, people, and economy.

The State has demonstrated a significant effort in recent years to engage sectors and the public at large in developing a New Hampshire Climate Action Plan (2009). The New Hampshire Department of Environmental Services was a leader in this effort. While it includes passing reference to the data used in that assessment, there is little connection made to the strategies and goals that the NH Climate Action Plan set forth toward energy usage in the state.

There are significant and cumulative co-benefits of reducing greenhouse gas emissions (specifically, minimizing the burning of fossil fuels) in order to reduce the impacts of climate change, as outlined in the NH Climate Action Plan's "Economic Opportunities" chapter. Thus, the State's energy strategy should leverage this document, and specifically consider how strategies set forth achieve the resulting economic benefits of addressing climate change including:

- Reduced spending by consumers, businesses and government on imported fossil fuels.
- Redirection of spending (from the above) directly into the state's economy, which increases state output and creates jobs.
- Reduced exposure to volatile imported energy prices, enabling a more stable business cost and investment environment in the state.
- Business development opportunities and job creation related to energy efficiency and generation of renewable sources of energy.
- Avoidance of costs associated with degradation of the natural environment and ecosystems and related decline in natural resources, tourism and related industries.
- Avoidance of costs associated with healthcare and related costs related to toxic emissions and climate change.

Moreover, the Strategy should be consistent with the goals of the NH Climate Action Plan, which are oriented toward "long-term reduction in greenhouse gas emissions of 80 percent below 1990 levels by 2050, consistent with the New England Governors – Eastern Canadian Premiers resolutions and the consensus recommendations of the scientific community" (NH Climate Action Plan 2009, p. 5).

To this end, the 67 actions of the Climate Action Plan are oriented around 10 overarching strategies, which should also be reflected in the State's energy strategy:

1. Maximize energy efficiency in buildings.
2. Increase renewable and low-co2-emitting sources of energy in a long-term sustainable manner.
3. Support regional and national actions to reduce greenhouse gas emissions.
4. Reduce vehicle emissions through state actions.
5. Encourage appropriate land use patterns that reduce vehicle-miles traveled.
6. Reduce vehicle-miles traveled through an integrated multi-modal transportation system.
7. Protect natural resources (land, water and wildlife) to maintain the amount of carbon fixed or sequestered.
8. Lead by example in government operations.
9. Plan for how to address existing and potential climate change impacts.
10. Develop an integrated education, outreach and workforce training program.

Our Commission representatives also reviewed the energy strategies of our neighboring states including the States of Massachusetts, Connecticut, and Vermont. There were common elements in all these sources that pointed out a potential missing element of NH's draft: our state strategy needs to more boldly emphasize the importance of clean and renewable energy and its impact on the environment and public health (as stated in SB191) in addition to addressing the economic impacts and benefits.

The overarching vision statement of the State Energy Strategy should include more substantial statements on the growth of a clean energy economy, decreasing environmental impacts of New Hampshire's energy use, encouraging municipalities to develop Green Communities, and promoting commitment to total energy reductions in towns and cities through policy, funding, and incentives. The overall plan itself should seek to maximize use of our state's brainpower and innovation—connecting the plan's implementation to our strong New Hampshire secondary education system, the resources these educational and research institutions provide, as well as the wealth of knowledge of our state's educators and to our student population as the future permanent residents of our great state.

Lastly, we strongly encourage the plan be developed as a unifying document for interagency collaboration of our state agencies, as issues of land development, land protection, energy use and community planning cannot be effectively utilizing a silo approach.

Overall we are impressed by OEP's depth of research in creating this draft plan and by the public process encouraging cities and towns to provide input. Thank you for soliciting public feedback and our expertise in contribution to this timely and important State Energy Strategy.

Sincerely,



Michele Alexander  
Chair, City of Dover Energy Commission

Cc: City of Dover Council  
J. Michael Joyal, Jr., City Manager  
Christopher G. Parker, AICP, Director of Planning and Community Development  
Timothy Corwin, Assistant City Planner