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TO: Madison Sustainable Design & Energy Committee Members  
FROM: Delora Newton,  
Executive Vice President, Greater Madison Chamber of Commerce  
DATE: April 11, 2011  
RE: The Madison Sustainability Plan

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Thank you for the opportunity to comment on the draft Madison Sustainability Plan. Our members strive to be as environmentally conscious and energy efficient as possible to the benefit of both their business and community. There are many goals and objectives throughout the draft plan that not only do we support, but we would hope to partner with the City to achieve. In particular, goals aimed at providing more information, educational outreach and voluntary incentives to make Madison businesses more sustainable are goals we would gladly support. It is why we continue to support the Dane County Clean Air Coalition and other regional initiatives aimed at creating a cleaner environment to live and work in.

As you note, the plan should be balanced, both in terms of environmental and social goals and the expected economic impact. The report also acknowledges that in certain cases there are market barriers that keep individuals and businesses from instituting sustainable practices. We agree that costs are a significant factor in what businesses are able to do, and that it is not always an option to make upgrades to their facility and business practices. We would encourage implementation of goals that provide more education and voluntary incentives as opposed to new costs and regulations.

Again, there are many positive ideas outlined in the plan. For the purpose of this memo we will focus on areas where there may be unintended economic consequences and should be removed from the report or modified.

- Natural Systems Goal 7: Improve Storm Management. The primary objective of this goal is to “develop more stringent requirements than those outlined by NR151 and Dane County Chapter 14 standards.” Our concern with this statement is the potential impact new regulations could have on property owners and the tax base. Instead, we encourage the City to focus on properly enforcing NR151 and providing additional education about ways to reduce pollution into our waters.
  
- Planning & Design Goal 3 proposes new LEED certification requirements for all construction supported by public funds (e.g., TIF). There could be unintended consequences with this requirement as it would likely increase the amount of TIF

requested by applicants. In addition, by spending more in TIF per project, it may ultimately decrease the number of projects the City would be able to support. The City's TIF policy objectives already encourage high standards for building design and materials. Those goals are appropriate but should not be made requirements for TIF assistance.

- Transportation Goal 2 includes an action item to create new policies and procedures that require all new developments to include a Transportation Demand Management Plan that prioritizes all transportation modes. We have strong objections to this recommendation. Not all areas of the city are the same or have access to mass transit options. For many parts of the city – especially the periphery – automobile is the primary mode of transit for customers and employees. While all development projects should consider different transportation modes, they cannot be prioritized equally in all cases.
- Carbon & Energy Goal 1 proposes researching the impact of downtown toll zones with the objective of reducing the number of vehicles downtown. Recognizing that this goal only states “researching” the idea, we must emphasize the devastating impact downtown tolls would have on downtown businesses. Customers would avoid the tolls, thus avoid the downtown area. A thriving, energetic downtown not only impacts businesses downtown, it also impacts the region. Our goal as a city should not be to reduce the number of vehicles downtown. A better way to approach the issue is to find more options for individuals to get downtown to shop, dine and recreate.
- Carbon & Energy Goal 3 proposes a new “green building fee” on development projects, and reducing the fee amount based on LEED certification. The goal also calls for a minimum 50% vegetated green roof on all new commercially constructed buildings. More taxes and regulations will not bring more business to Madison. It will send it to municipalities neighboring Madison, contributing to sprawl and impacting Madison's tax base.
- Employment & Workforce Goal 1 proposes attaching more requirements to city financial assistance tools and procurement and contracting policies, such as provisions for health benefits, project labor agreements, community benefit agreements, local hire, etc. While these provisions have positive effects, they can also add costs to projects. We must be cautious that we aren't attaching too many strings to financial incentives meant to stimulate economic growth. The same comments can be said for Employment & Workforce Goal 2 when discussing additional evaluation requirements to get city funding.

Thanks again for the opportunity to provide feedback on this report. We look forward to assisting with education and promoting voluntary incentives to help our members be more efficient. Feel free to contact me with any questions.