# **🚧 DRAFT 🚧**

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# Comparison of Existing Ordinances and Brookline Proposal

## 1 Comparison of coverage and scope

| Jurisdiction | Coverage thresholds | Building types covered | Net‑zero target and milestones | Electricity emissions | Reporting & verification |
| --- | --- | --- | --- | --- | --- |
| **Boston (BERDO 2.0)** | Non‑residential buildings ≥20 000 ft²; residential buildings with **15+ units** or **≥20 000 ft²**[[1]](https://www.boston.gov/departments/environment/berdo#:~:text=Who%20is%20covered%3F) | Commercial, institutional, industrial and multifamily buildings meeting thresholds; multiple buildings on one parcel aggregated[[1]](https://www.boston.gov/departments/environment/berdo#:~:text=Who%20is%20covered%3F) | Emissions caps start **2025** for larger buildings and **2030** for smaller ones[[2]](https://www.boston.gov/departments/environment/berdo#:~:text=1,compliance%20year); net‑zero by **2050**[[3]](https://www.boston.gov/departments/environment/berdo#:~:text=owners%20who%20need%20extra%20assistance,com) | Electricity use is included in emissions calculations; owners can procure renewable electricity or make alternative compliance payments into the **Equitable Emissions Investment Fund**[[4]](https://www.boston.gov/departments/environment/equitable-emissions-investment-fund#:~:text=The%C2%A0Building%20Emissions%20Reduction%20and%20Disclosure,established%20to%20support%20this%20goal) | Annual energy and emissions reporting; third‑party verification in verification years (2026, 2030, 2034…)[[5]](https://www.boston.gov/departments/environment/berdo#:~:text=HOW%20DO%20I%20COMPLY%20WITH,PARTY%20VERIFICATION) |
| **Cambridge (BEUDO)** | Only non‑residential buildings **≥25 000 ft²** are subject to emissions standards[[6]](https://www.cambridgema.gov/sustainable/BEUDO#:~:text=Buildings%20below%2025%2C000%20square%20feet,not%20covered%20by%20BEUDO%20regulations); buildings **≥100 000 ft²** have accelerated timelines[[7]](https://www.cambridgema.gov/sustainable/BEUDO#:~:text=%2A%20Non,to%20net%20zero%20by%202035) | Non‑residential buildings; residential buildings of any size must report but are not required to reduce emissions[[8]](https://www.cambridgema.gov/sustainable/BEUDO#:~:text=Residential%20buildings%2C%20regardless%20of%20size%2C,energy%20and%20water%20use%20data) | ≥100 k ft² buildings must reach **net‑zero by 2035**[[7]](https://www.cambridgema.gov/sustainable/BEUDO#:~:text=%2A%20Non,to%20net%20zero%20by%202035); 25–100 k ft² must start reducing in **2030** and reach net‑zero by **2050**[[7]](https://www.cambridgema.gov/sustainable/BEUDO#:~:text=%2A%20Non,to%20net%20zero%20by%202035) | Electricity included; owners may purchase renewable energy (PPAs/VPPAs)[[9]](https://www.cambridgema.gov/sustainable/BEUDO#:~:text=Purchase%20Renewable%20Energy%3A%20Starting%20in,VPPAs) or **Verified Carbon Credits** (VCCs) starting 2030[[10]](https://www.cambridgema.gov/sustainable/BEUDO#:~:text=Verified%20Carbon%20Credits%3A%20Starting%20in,site%20thermal%20energy%20emissions); alternative compliance credits priced at **$234 per metric ton**[[11]](https://www.cambridgema.gov/sustainable/BEUDO#:~:text=Alternative%20Compliance%20Payments%3A%20are%20payments,234%2FmT%20for%202026%20to%202030) | Annual benchmarking through ENERGY STAR Portfolio Manager; baseline established using two consecutive years between 2010–2019[[12]](https://www.cambridgema.gov/sustainable/BEUDO#:~:text=Owners%20of%20all%20Covered%20Properties,in%20a%20process%20called%20benchmarking); data verification starting 2026[[13]](https://www.cambridgema.gov/sustainable/BEUDO#:~:text=The%20baseline%20is%20the%20initial,in%20energy%20efficiency%20and%20electrification) |
| **Newton (BERDO 2024)** | Commercial buildings **≥20 000 ft²** initially; residential buildings ≥20 000 ft² to be added later[[14]](https://www.nationalgridus.com/media/pdfs/ma/project-expediter-program/2024-september-pex-meeting.pdf#:~:text=BERDO%20Notes%20for%20PEX%20Meeting,vote%20to%20approve%20BERDO%2038)[[15]](https://www.nationalgridus.com/media/pdfs/ma/project-expediter-program/2024-september-pex-meeting.pdf#:~:text=Buildings%20Covered%20%E2%80%A2%20BERDO%20covers,including%20centrally%20heated%20residential%20condos) | Focus on large commercial buildings; future phase will include multifamily residential; covers ~293 commercial and ~120 residential buildings[[14]](https://www.nationalgridus.com/media/pdfs/ma/project-expediter-program/2024-september-pex-meeting.pdf#:~:text=BERDO%20Notes%20for%20PEX%20Meeting,vote%20to%20approve%20BERDO%2038) | Uses five compliance intervals from **2026** through **2050**[[16]](https://www.nationalgridus.com/media/pdfs/ma/project-expediter-program/2024-september-pex-meeting.pdf#:~:text=%E2%80%A2%20Scope%3A%20Includes%20direct%20emissions,year%203%20of%20emission%20standards); buildings must eliminate on‑site fossil‑fuel emissions within 20–25 years[[17]](https://www.nationalgridus.com/media/pdfs/ma/project-expediter-program/2024-september-pex-meeting.pdf#:~:text=PEX%20vendor%20notes%20%E2%80%A2%20Newton,whole%20building%20all%20at%20once) | **Excludes electricity emissions** from compliance; owners report electricity but are not penalised[[17]](https://www.nationalgridus.com/media/pdfs/ma/project-expediter-program/2024-september-pex-meeting.pdf#:~:text=PEX%20vendor%20notes%20%E2%80%A2%20Newton,whole%20building%20all%20at%20once) | Reporting via ENERGY STAR; third‑party verification every five years; fines and alternative compliance payments directed to environmental‑justice projects[[16]](https://www.nationalgridus.com/media/pdfs/ma/project-expediter-program/2024-september-pex-meeting.pdf#:~:text=%E2%80%A2%20Scope%3A%20Includes%20direct%20emissions,year%203%20of%20emission%20standards) |
| **Brookline proposal/plan** | Several options: **Low impact** (non‑residential ≥20 000 ft²); **Medium impact** (all MA LBER buildings ≥20 000 ft²); **High impact** (all buildings including single‑family homes) | Initially targets large non‑residential buildings; later phases would include residential buildings and gradually lower the square‑footage threshold (15 k ft² in 2032, 10 k in 2033, 5 k in 2034) | Aims for **net‑zero by 2040**; the plan’s phase‑in timeline begins in **2026** with non‑residential buildings and reaches full coverage by 2040 | Proposal suggests reporting electricity but excluding it from compliance, following Newton’s model; final decision left to rulemaking | Aligns with MA LBER reporting; future ordinance would specify verification years and third‑party review. |

### Observations

* **Threshold differences:** Boston and Newton use 20 000 ft² for both commercial and residential coverage, while Cambridge’s threshold is 25 000 ft² and adds an accelerated schedule for ≥100 k ft² buildings[[6]](https://www.cambridgema.gov/sustainable/BEUDO#:~:text=Buildings%20below%2025%2C000%20square%20feet,not%20covered%20by%20BEUDO%20regulations). Brookline’s proposal lists options aligned with MA LBER (≥20 k ft²) but leaves open whether to cover smaller buildings.
* **Net‑zero timelines:** Cambridge’s largest buildings must decarbonize by **2035**[[7]](https://www.cambridgema.gov/sustainable/BEUDO#:~:text=%2A%20Non,to%20net%20zero%20by%202035), earlier than Boston’s **2050** target[[3]](https://www.boston.gov/departments/environment/berdo#:~:text=owners%20who%20need%20extra%20assistance,com). Newton aims for zero on‑site fossil‑fuel combustion by 2050 but allows owners 20–25 years[[17]](https://www.nationalgridus.com/media/pdfs/ma/project-expediter-program/2024-september-pex-meeting.pdf#:~:text=PEX%20vendor%20notes%20%E2%80%A2%20Newton,whole%20building%20all%20at%20once). Brookline seeks a **2040** finish, more ambitious than Boston/Newton but slower than Cambridge’s largest‑building timeline.
* **Electricity treatment:** Newton excludes electricity from compliance[[17]](https://www.nationalgridus.com/media/pdfs/ma/project-expediter-program/2024-september-pex-meeting.pdf#:~:text=PEX%20vendor%20notes%20%E2%80%A2%20Newton,whole%20building%20all%20at%20once), while Boston and Cambridge include it and allow alternative compliance payments or renewable procurement. Brookline’s proposal leans toward Newton’s approach—report but do not penalize electricity use—citing fairness for owners who electrify their buildings.
* **Alternative compliance pricing:** Both Boston and Cambridge set alternative compliance payments around **$234 per metric ton**[[11]](https://www.cambridgema.gov/sustainable/BEUDO#:~:text=Alternative%20Compliance%20Payments%3A%20are%20payments,234%2FmT%20for%202026%20to%202030); Newton’s costs are unspecified but fines fund local environmental‑justice projects. Brookline’s plan adopts the $234/mT figure in Phase 2.

## 2 Press commentary

Understanding stakeholder sentiment helps anticipate political challenges. Below are selected perspectives from news and advocacy sources.

### Positive perspectives

* **Boston’s equitable process:** An NRDC blog celebrates Boston’s BERDO 2.0, noting that the ordinance is a “win for residents” because it was developed through a transparent process that centered the priorities of those most affected by pollution and housing costs[[18]](https://www.nrdc.org/bio/emily-barkdoll/boston-passes-equitable-building-performance-standard#:~:text=This%20is%20a%20win%20for,residents). The article highlights co‑benefits such as **better air quality**, **reduced energy bills** and an **equitable emissions investment fund** administered by a review board[[19]](https://www.nrdc.org/bio/emily-barkdoll/boston-passes-equitable-building-performance-standard#:~:text=Boston%20has%20taken%20a%20huge,be%20net%20zero%20by%202050)[[18]](https://www.nrdc.org/bio/emily-barkdoll/boston-passes-equitable-building-performance-standard#:~:text=This%20is%20a%20win%20for,residents).
* **Newton advocates:** Green Newton describes Newton’s BERDO as an important step toward net‑zero and explains that large commercial buildings account for 23 % of the city’s GHG emissions; requiring them to measure emissions and reduce over time will help meet the city’s climate goals[[20]](https://greennewton.org/what-is-berdo-answers-to-your-questions/#:~:text=In%20December%202024%2C%20Newton%E2%80%99s%20City,being%20used%20in%20the%20city). An article on the ordinance’s passage notes that the city council approved it **23–0** and frames it as a significant climate milestone[[21]](https://greennewton.org/berdo-passed-by-newton-city-council/#:~:text=Great%20News%21%20BERDO%20,to%20reduce%20their%20GHG%20emissions).

### Critiques and concerns

* **Cambridge small‑business anxiety:** A Cambridge Day article details concerns from small property owners who fear that BEUDO’s accelerated timeline and costs are unrealistic. One property manager notes that universities have sustainability teams but most owners do not: *“I am the sustainability team. If the city is serious about going carbon neutral, you have to help people get there”*[[22]](https://www.cambridgeday.com/2022/08/25/smaller-business-and-property-owners-anxious-over-costs-of-new-clean-energy-requirements/#:~:text=consultants%20to%20evaluate%20the%20costs%2C,Barrett%20said). Another owner criticizes the ordinance for including apartment buildings while omitting large single‑family homes, arguing that this inequity places greater burdens on multifamily buildings[[23]](https://www.cambridgeday.com/2022/08/25/smaller-business-and-property-owners-anxious-over-costs-of-new-clean-energy-requirements/#:~:text=Charlie%20Marquardt%2C%20owner%20of%20Mid,family%20homes%2C%20he%20said). The article also records civic complaints about the process, such as hearings being cancelled and last‑minute changes to ordinance language[[24]](https://www.cambridgeday.com/2022/08/25/smaller-business-and-property-owners-anxious-over-costs-of-new-clean-energy-requirements/#:~:text=The%20cancellation%20of%20Beudo%20hearings,%E2%80%9D). Commenters warn that electrification without major grid upgrades could lead to higher upstream emissions and grid bottlenecks[[25]](https://www.cambridgeday.com/2022/08/25/smaller-business-and-property-owners-anxious-over-costs-of-new-clean-energy-requirements/#:~:text=leaves%20us%20burning%20more%20coal,know%20nothing%20about%20how%20buildings).
* **Boston compliance challenges:** A Boston.com report notes that **few building owners had submitted their greenhouse‑gas data** by late 2022, prompting the city to extend reporting deadlines[[26]](https://www.boston.com/news/local-news/2022/11/20/barely-any-boston-buildings-have-reported-their-greenhouse-gas-emissions-despite-new-rule/#:~:text=Boston%20building%20owners%20might%20be,15). Business groups expressed concerns about how BERDO fits with other state and federal programs and flagged difficulties in verifying data[[27]](https://www.boston.com/news/local-news/2022/11/20/barely-any-boston-buildings-have-reported-their-greenhouse-gas-emissions-despite-new-rule/#:~:text=Boston%20building%20owners%20might%20be,15).
* **Newton cost impacts:** The Newton Beacon reports that meeting BERDO requirements could increase rents by about **4 %** and that capital costs for compliance range from **$5–35 per square foot**[[28]](https://www.newtonbeacon.org/how-much-could-the-proposed-berdo-cost-property-owners/#:~:text=Cost%20of%20compliance). It also notes that the city must budget up to **$290 000 per year** for administration[[29]](https://www.newtonbeacon.org/how-much-could-the-proposed-berdo-cost-property-owners/#:~:text=There%20will%20be%20costs%20to,to%20administer%20the%20BERDO%20program). These concerns suggest that policymakers will need to balance decarbonization goals with affordability and economic impacts.

## 3 Gaps and opportunities for Brookline

* **Balancing ambition and feasibility.** Brookline’s proposed **2040 net‑zero target** is more ambitious than Boston’s and Newton’s 2050 goals but less aggressive than Cambridge’s requirement for very large buildings to decarbonize by 2035. Adopting Cambridge’s accelerated timeline for buildings ≥100 000 ft² could focus early action on the largest emitters while retaining a 2040 goal for smaller buildings.
* **Scope decisions.** The choice of threshold will determine the number of buildings covered. Aligning with MA LBER (≥20 k ft²) ensures consistency and administrative simplicity but covers more buildings than Cambridge’s 25 k ft² threshold. Brookline’s plan contemplates gradually lowering the threshold to 5 000 ft²; however, this expansion will require additional staff and support programmes.
* **Electricity emissions.** Brookline must decide whether to count electricity emissions. Excluding them (Newton model) would reduce complexity and avoid penalizing electrified buildings but may limit overall emissions reductions. Including electricity (Boston/Cambridge model) encourages renewable procurement and deeper decarbonization but requires more complex accounting.
* **Alternative compliance design.** Lessons from Boston and Cambridge suggest that alternative compliance payments should be tied to an **equitable investment fund** and priced high enough ($234/mT) to incentivize direct reductions[[11]](https://www.cambridgema.gov/sustainable/BEUDO#:~:text=Alternative%20Compliance%20Payments%3A%20are%20payments,234%2FmT%20for%202026%20to%202030). Brookline can also incorporate Cambridge‑style limits on the use of offsets (declining caps on Verified Carbon Credits) to ensure local benefits.
* **Equity and support.** All three ordinances provide support for environmental‑justice communities—Boston through its Equitable Emissions Investment Fund[[4]](https://www.boston.gov/departments/environment/equitable-emissions-investment-fund#:~:text=The%C2%A0Building%20Emissions%20Reduction%20and%20Disclosure,established%20to%20support%20this%20goal), Cambridge through funding that prioritizes affordable housing projects, and Newton through local reinvestment of fines. Brookline’s proposal rightly emphasises an **Equitable Emissions Investment Fund** and suggests assistance programmes and financing options; implementing these elements effectively will be critical for equity and political acceptance.
* **Stakeholder engagement.** Press coverage highlights the importance of robust outreach. Cambridge’s roll‑out faced criticism for insufficient communication and limited support for small businesses[[30]](https://www.cambridgeday.com/2022/08/25/smaller-business-and-property-owners-anxious-over-costs-of-new-clean-energy-requirements/#:~:text=consultants%20to%20evaluate%20the%20costs%2C,Barrett%20said). Boston had to extend deadlines because few owners submitted data[[26]](https://www.boston.com/news/local-news/2022/11/20/barely-any-boston-buildings-have-reported-their-greenhouse-gas-emissions-despite-new-rule/#:~:text=Boston%20building%20owners%20might%20be,15). Brookline’s plan includes a detailed **stakeholder engagement plan** (Phase 1A/B/C), which should be fully implemented to avoid similar pitfalls.

## Summary

Brookline’s proposed BERDO can draw on the strengths of neighbouring ordinances while addressing their shortcomings. An effective ordinance will balance ambition and feasibility, adopt equitable compliance mechanisms, provide robust support programmes, and engage stakeholders early and often. The press commentary underscores that even well‑designed policies face opposition unless they are paired with financial assistance, clear communication, and sensitivity to cost impacts. By learning from Boston, Cambridge and Newton, Brookline can craft a building‑performance standard that accelerates decarbonization, protects vulnerable populations and enjoys durable political support.

[[1]](https://www.boston.gov/departments/environment/berdo#:~:text=Who%20is%20covered%3F) [[2]](https://www.boston.gov/departments/environment/berdo#:~:text=1,compliance%20year) [[3]](https://www.boston.gov/departments/environment/berdo#:~:text=owners%20who%20need%20extra%20assistance,com) [[5]](https://www.boston.gov/departments/environment/berdo#:~:text=HOW%20DO%20I%20COMPLY%20WITH,PARTY%20VERIFICATION) Building Emissions Reduction And Disclosure | Boston.gov

<https://www.boston.gov/departments/environment/berdo>

[[4]](https://www.boston.gov/departments/environment/equitable-emissions-investment-fund#:~:text=The%C2%A0Building%20Emissions%20Reduction%20and%20Disclosure,established%20to%20support%20this%20goal) Equitable Emissions Investment Fund | Boston.gov

<https://www.boston.gov/departments/environment/equitable-emissions-investment-fund>

[[6]](https://www.cambridgema.gov/sustainable/BEUDO#:~:text=Buildings%20below%2025%2C000%20square%20feet,not%20covered%20by%20BEUDO%20regulations) [[7]](https://www.cambridgema.gov/sustainable/BEUDO#:~:text=%2A%20Non,to%20net%20zero%20by%202035) [[8]](https://www.cambridgema.gov/sustainable/BEUDO#:~:text=Residential%20buildings%2C%20regardless%20of%20size%2C,energy%20and%20water%20use%20data) [[9]](https://www.cambridgema.gov/sustainable/BEUDO#:~:text=Purchase%20Renewable%20Energy%3A%20Starting%20in,VPPAs) [[10]](https://www.cambridgema.gov/sustainable/BEUDO#:~:text=Verified%20Carbon%20Credits%3A%20Starting%20in,site%20thermal%20energy%20emissions) [[11]](https://www.cambridgema.gov/sustainable/BEUDO#:~:text=Alternative%20Compliance%20Payments%3A%20are%20payments,234%2FmT%20for%202026%20to%202030) [[12]](https://www.cambridgema.gov/sustainable/BEUDO#:~:text=Owners%20of%20all%20Covered%20Properties,in%20a%20process%20called%20benchmarking) [[13]](https://www.cambridgema.gov/sustainable/BEUDO#:~:text=The%20baseline%20is%20the%20initial,in%20energy%20efficiency%20and%20electrification) BEUDO

<https://www.cambridgema.gov/sustainable/BEUDO>

[[14]](https://www.nationalgridus.com/media/pdfs/ma/project-expediter-program/2024-september-pex-meeting.pdf#:~:text=BERDO%20Notes%20for%20PEX%20Meeting,vote%20to%20approve%20BERDO%2038) [[15]](https://www.nationalgridus.com/media/pdfs/ma/project-expediter-program/2024-september-pex-meeting.pdf#:~:text=Buildings%20Covered%20%E2%80%A2%20BERDO%20covers,including%20centrally%20heated%20residential%20condos) [[16]](https://www.nationalgridus.com/media/pdfs/ma/project-expediter-program/2024-september-pex-meeting.pdf#:~:text=%E2%80%A2%20Scope%3A%20Includes%20direct%20emissions,year%203%20of%20emission%20standards) [[17]](https://www.nationalgridus.com/media/pdfs/ma/project-expediter-program/2024-september-pex-meeting.pdf#:~:text=PEX%20vendor%20notes%20%E2%80%A2%20Newton,whole%20building%20all%20at%20once) September PEX Meeting

<https://www.nationalgridus.com/media/pdfs/ma/project-expediter-program/2024-september-pex-meeting.pdf>

[[18]](https://www.nrdc.org/bio/emily-barkdoll/boston-passes-equitable-building-performance-standard#:~:text=This%20is%20a%20win%20for,residents) [[19]](https://www.nrdc.org/bio/emily-barkdoll/boston-passes-equitable-building-performance-standard#:~:text=Boston%20has%20taken%20a%20huge,be%20net%20zero%20by%202050) Boston Passes Equitable Building Performance Standard

<https://www.nrdc.org/bio/emily-barkdoll/boston-passes-equitable-building-performance-standard>

[[20]](https://greennewton.org/what-is-berdo-answers-to-your-questions/#:~:text=In%20December%202024%2C%20Newton%E2%80%99s%20City,being%20used%20in%20the%20city) What is BERDO? Answers to Your Questions

<https://greennewton.org/what-is-berdo-answers-to-your-questions/>

[[21]](https://greennewton.org/berdo-passed-by-newton-city-council/#:~:text=Great%20News%21%20BERDO%20,to%20reduce%20their%20GHG%20emissions) BERDO Passed by Newton City Council: New Ordinance Marks Big Step Towards Achieving GHG Emissions Reduction

<https://greennewton.org/berdo-passed-by-newton-city-council/>

[[22]](https://www.cambridgeday.com/2022/08/25/smaller-business-and-property-owners-anxious-over-costs-of-new-clean-energy-requirements/#:~:text=consultants%20to%20evaluate%20the%20costs%2C,Barrett%20said) [[23]](https://www.cambridgeday.com/2022/08/25/smaller-business-and-property-owners-anxious-over-costs-of-new-clean-energy-requirements/#:~:text=Charlie%20Marquardt%2C%20owner%20of%20Mid,family%20homes%2C%20he%20said) [[24]](https://www.cambridgeday.com/2022/08/25/smaller-business-and-property-owners-anxious-over-costs-of-new-clean-energy-requirements/#:~:text=The%20cancellation%20of%20Beudo%20hearings,%E2%80%9D) [[25]](https://www.cambridgeday.com/2022/08/25/smaller-business-and-property-owners-anxious-over-costs-of-new-clean-energy-requirements/#:~:text=leaves%20us%20burning%20more%20coal,know%20nothing%20about%20how%20buildings) [[30]](https://www.cambridgeday.com/2022/08/25/smaller-business-and-property-owners-anxious-over-costs-of-new-clean-energy-requirements/#:~:text=consultants%20to%20evaluate%20the%20costs%2C,Barrett%20said) Smaller business and property owners anxious over costs of new clean-energy requirements - Cambridge Day

<https://www.cambridgeday.com/2022/08/25/smaller-business-and-property-owners-anxious-over-costs-of-new-clean-energy-requirements/>

[[26]](https://www.boston.com/news/local-news/2022/11/20/barely-any-boston-buildings-have-reported-their-greenhouse-gas-emissions-despite-new-rule/#:~:text=Boston%20building%20owners%20might%20be,15) [[27]](https://www.boston.com/news/local-news/2022/11/20/barely-any-boston-buildings-have-reported-their-greenhouse-gas-emissions-despite-new-rule/#:~:text=Boston%20building%20owners%20might%20be,15) Barely any Boston buildings have reported their greenhouse gas emissions, despite new rule

<https://www.boston.com/news/local-news/2022/11/20/barely-any-boston-buildings-have-reported-their-greenhouse-gas-emissions-despite-new-rule/>

[[28]](https://www.newtonbeacon.org/how-much-could-the-proposed-berdo-cost-property-owners/#:~:text=Cost%20of%20compliance) [[29]](https://www.newtonbeacon.org/how-much-could-the-proposed-berdo-cost-property-owners/#:~:text=There%20will%20be%20costs%20to,to%20administer%20the%20BERDO%20program) How much could the proposed BERDO cost property owners? - Newton Beacon

<https://www.newtonbeacon.org/how-much-could-the-proposed-berdo-cost-property-owners/>