



November 16, 2022

Mia Mansfield
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Richard A. Dimino
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RE: A Better City’s Formal Comments on the Draft MA Climate Change Assessment

Dear Ms. Mansfield:

On behalf of A Better City’s 130-member business organizations, we thank you and congratulate you and your team on a thoughtful and comprehensive Draft MA Climate Change Assessment (Assessment). We are appreciative of the opportunity to provide comments and look forward to ongoing conversations around how this Assessment will impact an update to the State Hazard Mitigation and Climate Adaptation Plan (SHMCAP), as well as help to guide climate funding, governance, and implementation decision-making in the Commonwealth moving forward.

Throughout our work on coastal resilience through Climate Ready Boston, urban tree canopy through Boston’s 20-Year Urban Forest Plan, and extreme heat through Boston’s Heat Plan, as well as engaging in community heat resilience solutions - we remain committed to helping to protect the Commonwealth from impending climate threats and to finding climate solutions that work in partnership with the business community.

We offer some initial comments on the Assessment below, which have also been submitted via online form as requested. We look forward to continuing to work together to help protect our communities, our critical infrastructure, and our Commonwealth.

Sincerely,

Richard A. Dimino
President and CEO
A Better City

Enclosures: 3
cc: Secretary Bethany Card
Undersecretary Judy Chang

A. EXECUTIVE SUMMARY COMMENTS

A Better City's comments regarding the Executive Summary content are included below:

- **Emphasizing Regional Approaches to Resilience Governance, Finance, and Implementation:** A Better City is concerned that there is not sufficient emphasis on a regional approach to climate threats across jurisdictions. While there are sub-regions highlighted in the Assessment, there are no considerations of how threats will be addressed *across* these regions in coordination. For example, much of our critical infrastructure crosses jurisdictional boundaries, and our investments in resilient critical infrastructure like pipelines, telecommunications, and transportation networks – will require an approach that works both at the state-level, and at the regional level across jurisdictions. Additionally, a regional approach would encourage greater emphasis on the need for collaboration with other states beyond the Commonwealth on transmission and interconnection infrastructure; delays in such infrastructure due to regional politics continue to be a threat to achieving our climate goals and protecting our communities.
- **Supporting Public-Private Partnerships:** A Better City recommends greater emphasis on the need for public-private partnerships, particularly in supporting climate resilience interventions on privately owned land. In the example of coastal resilience, we recommend working with the Wharf District Council to consider how to scale up public-private partnerships. For extreme heat and urban forestry interventions, we strongly urge the State to engage the private sector and developers with resilience interventions on private property. Particularly considering that over 60% of Boston's urban tree canopy is on privately owned land, and that the majority of natural and working lands in the State are in private ownership, the State must partner with private landowners to successfully implement resilience initiatives. Finally, we recommend the State consider the role of incentives for resilient infrastructure investments that may help to scale up public-private partnerships for climate adaptation.
- **Clarifying Impact on Climate Funding:** It would be helpful to clarify in the Executive Summary how the MA Climate Change Assessment may or may not impact future opportunities to leverage federal funding for climate initiatives in the Commonwealth.
- **Promoting Alignment Across Parallel Adaptation Policies:** We are curious to know how this Assessment will inform parallel adaptation and related mitigation policies at the state-level, including the State Hazard Mitigation and Climate Adaptation Plan, the Resilient Massachusetts Action Team's work, the Municipal Vulnerability Preparedness program, energy resilience initiatives within ISO-NE, energy resilience initiatives pursued by utilities, and anticipated federal resilience initiatives in the Commonwealth, to name a few. We are also interested to learn how this Assessment aligns with existing municipal climate resilience efforts like Boston's Climate Ready Boston reports, Greater Boston Research Advisory Group (GBRAG) report, Heat Plan, and 20-Year Urban Forest Plan. Further clarifying the possible impact of this Assessment on parallel climate adaptation policies impacting Massachusetts would be helpful.
- **Considering Cumulative Impacts & Compounding Threats:** A Better City recommends greater emphasis on the cumulative impact of climate threats, particularly on vulnerable populations. While each sector considers disproportionate impacts of specific climate threats, the impact on frontline communities is exacerbated when multiple climate threats impact the same communities over time. Additionally, A Better City urges the State to consider the interconnected nature of climate threats,

and that together, these threats can compound the negative impacts on communities. For example, extreme heat is listed as the number one threat to the human sector, followed by air pollution. For environmental justice communities like Chinatown that are heat island hotspots and have disproportionately high rates of asthma as well as particulate matter – the compounding impacts of heat exacerbating poor air quality and triggering greater asthma attacks illustrates why these threats need to be reviewed as both cumulative and compounding.

- **Incorporating Equity, & Climate Justice:**

- **Considering IAC Cross-Sector Climate Justice Recommendations:** We recommend considering the cross-sector [recommendations](#) from the Implementation Advisory Committee’s Climate Justice Working Group, and how these may be translated and relevant to the MA Climate Change Assessment.
- **Limitations with EJ Block Group Data:** We understand that EJ Block Group data, used to assess disproportionate impacts of climate threats on environmental justice populations, are largely fueled by census geospatial data. As we have heard from Environmental Justice Council deliberations, EJ Block Group data do not adequately capture tribal populations, communities that have wide income disparities within one neighborhood, undocumented populations, unhoused populations, and other vulnerable communities, and do not provide a complete view of environmental justice populations in Massachusetts. We therefore recommend following the guidance of the Environmental Justice Council regarding how to best capture environmental justice populations in our climate resilience and preparedness efforts.

B. SECTOR-SPECIFIC COMMENTS FOR CONSIDERATION

A Better City's sector-specific comments are included for your consideration below:

1. Human Sector

- **Extreme Heat:** A Better City agrees with the need to focus on extreme heat as a key climate threat, since this is the #1 silent killer of all weather-related climate impacts and poses a threat to our communities, our economy, and critical infrastructure. However, we are concerned that the human sector does not clarify how heat impacts environmental justice communities and communities of color worst and first. We recommend placing greater emphasis on the disproportionate threat of heat on environmental justice and communities of color in the Assessment itself, as Boston's Heat Plan did with neighborhood heat island hotspots like Chinatown, Dorchester, East Boston, Mattapan, and Roxbury.
- **Addressing Compounding & Cumulative Impacts:** A Better City recommends connecting the threats within the human sector to understand compounding and cumulative impacts that will make certain populations even more vulnerable. As mentioned above, populations that are hot spot communities with disproportionate air pollution will also likely have disproportionately high rates of asthma. Since people living with asthma are more likely to be triggered to have an asthma attack in heat wave events, and even more likely when heat waves are combined with poor air quality – their vulnerability due to compounding threats is not currently captured in the draft Assessment.
- **Incorporating Social Isolation as a Threat:** While A Better City appreciates the references to language isolation making certain populations more vulnerable to climate threats, we would recommend also considering the role of social isolation more broadly as a threat multiplier to certain vulnerable populations (ex. the elderly, unhoused, and/or disabled residents).
- **Quantifying Extreme Heat Costs:** A Better City urges the State to work with leading healthcare institutions to better understand premature deaths attributable to extreme heat, as we believe that the numbers referenced in the Assessment may be undercounting heat-related deaths. We also want to encourage the expansion of economic costs of extreme heat by region beyond that of premature deaths as captured in Figure 7. The health impacts and associated economic costs of extreme heat are extensive, can be lifelong, and go far beyond premature fatalities, so we recommend they be more broadly defined and vetted in the human sector of the Assessment. Suggested considerations include healthcare costs associated with extreme heat-related illnesses and deaths, as increases in ambulatory visits, emergency room visits, and three-day return visits to the emergency department during heat emergencies increase, in addition to the exacerbation of existing medical conditions.
- **Incorporating Regional Extreme Heat Preparedness:** On page 36, we also recommend referencing the Metropolitan Area Planning Council's Keeping Metro Boston Cool [report](#), conducted in partnership with the Metro Mayors Climate Taskforce. Additionally, we suggest referencing the Greater Boston Research Advisory Group [report](#) from 2022, which includes additional regional considerations for Metro Boston.

2. Infrastructure Sector

- **Electric Grid Capacity:** A Better City is concerned that there is not enough emphasis on the electric grid's ability to supply clean, reliable, affordable, resilient, and sufficient capacity in electricity across the region, which will put the Commonwealth at greater risk of power failure as we electrify our buildings and transportation (with even greater risks of power failure during extreme heat events, for example). We recommend incorporating concerns for sufficient grid capacity, reliability, resilience, and affordability on page 55. We believe that the risk of grid failure is a climate threat multiplier, as this

will threaten our critical infrastructure including transportation mobility and communications, which will be vital in keeping our communities safe during heat emergencies and other climate emergencies.

- **Integrating Resilience Across Multiple Climate Threats:** We know that multiple climate threats impact our infrastructure in compounding and cumulative ways, so we need our climate adaptation guidelines for resilient infrastructure to plan across multiple climate threats at once. In addition to making our infrastructure more resilient to flooding, for example, we also need to incorporate resilience against extreme heat, drought, wind, extreme precipitation, and other climate threats so that our resilience investments provide multiple co-benefits and are as cost-effective as possible. Additionally, we recommend the State consider how multiple climate threats will impact our critical transportation infrastructure like public transit, highways, and roadways, and whether future transportation financing and bond bills should calculate and include the cost of needed resilient transportation infrastructure upgrades more effectively.
- **Considering Drought Impacts to the Built Environment:** As we have learned in Boston, ongoing periods of drought may threaten to lower the water table, meaning that wooden pilings intended to be permanently submerged in water, may be exposed to air and vulnerable to rotting. Considering the interconnectedness of these threats, and how the natural environment sector will impact infrastructure and other sectors, is crucial.

3. Natural Environment Sector

- **Clarifying Threat By Land Type:** It would be helpful for the Assessment to consider how climate threats operate differently across private, public, tribal, and federally owned land, and how those differences may impact climate resilience implementation. For example, for urban tree canopy, as mentioned above, we know that over 60% of Boston's existing canopy is on privately owned land, meaning that the success of resilience interventions on the natural environment will hinge upon private sector collaboration and working with private landowners. We also urge the State to consider how to implement resilient natural environmental solutions regionally, perhaps at a watershed-scale, across different land ownership types, including public, private, tribal, and federal lands.
- **Integrating Boston's 20 Year Urban Forest Plan, Promoting Tree Equity, & Leveraging Private Landowners:** While A Better City is grateful to see several references to Boston's Heat Plan, we are concerned that there is not sufficient alignment or coordination with [Boston's 20-Year Urban Forest Plan](#). As mentioned above with heat vulnerability, we urge the State to consider the low percentages of tree canopy coverage in environmental justice neighborhoods and communities of color, compared to other neighborhoods. A Better City recommends considering the suggested interventions of the Urban Forest Plan, as well as considering the establishment of a State-Level Private Landowner Focus Group to help implement tree canopy solutions on privately owned land, in addition to filling existing data gaps on tree canopy coverage across land typologies.

4. Governance Sector

- **Filling Regional Governance Gaps:** As mentioned in several comment letters at the state-level, A Better City is concerned that there is not sufficient governance to implement resilience solutions that work across jurisdictions in the Commonwealth. While we appreciate the role of the Municipal Vulnerability Preparedness Program, and its efforts to consider regional projects, we believe that more must be done to address regional governance, implementation, and financing of resilience initiatives. A Better City recommends considering the establishment of a State-level Resilience Commission to help fill this key regional governance gap and/or leveraging existing regional well-respected governance bodies like the Massachusetts Water Resources Authority (MWRA) to help with climate resilience implementation.

- **Working with Regional Partners:** A Better City is concerned that there is not sufficient emphasis on the need for inter-state collaboration within the region, which could lead to inaction with neighboring states. In the example of transmission infrastructure for projects like the Hydro Quebec Pipeline, the Commonwealth remains vulnerable to delays in climate and energy resilience due to the actions of our regional partners.
- **Inequitable Climate Migration:** While A Better City appreciates the initial consideration of climate migration in the face of climate threats, we also urge the State to consider that not all residents will have the means or ability to move out of harm's way, and that our environmental justice communities and communities of color cannot be left behind in our climate migratory efforts. Additionally, compounding with the lack of affordable housing, if some of the only affordable housing remains in areas at disproportionate risk of climate threats, then this will further drive vulnerable populations to inhabit homes that will be hit worst and first by flooding, heat, and other threats from climate change.

5. Economic Sector

- **Existing Loss of Labor Productivity During Heat Events:** Although the assessment considers the risk of future economic impacts due to loss of labor productivity during heat emergencies, A Better City recommends clarifying that we are already losing around [\\$100B annually](#) from loss in labor productivity during heat waves, with even greater economic costs to our healthcare systems during heat events. Finally, as mentioned above, we believe that illnesses and deaths attributable to heat emergencies are being undercounted, meaning that the economic and social impacts of heat are also being underestimated. Since heat is seen as a silent killer (with heat-related deaths often being masked as attributable to asthma, cardiovascular conditions, age, etc.), it means that the economic impacts of it as a climate threat are not being fully captured. Finally, while the Assessment considers impact on labor productivity for folks who are not able to work inside during heat emergencies, we also urge the State to consider the health and safety of remote workers and/or students who must work from home in inefficient, unsafe housing that may not have access to affordable or accessible cooling relief.

C. REGIONAL FINDINGS

A Better City's comments on regional findings are included for your consideration below:

- **Including Cross-Regional Findings and Threats for Implementation:** While A Better City appreciates the sub-region analysis of climate threats and agrees with the threats listed for Boston, we also recommend considering how climate threats will be experienced across the region, like in Metro Boston, or at a watershed-scale across the Commonwealth. Thinking through climate threats at a regional scale will help to identify challenges for resilience governance, financing, and implementation, as mentioned above, and will help to clarify interventions for critical infrastructure and community resilience across jurisdictions. In addition to considering regional threats in the Assessment (beyond analysis of sub-regions as written), we also recommend considering regional equity challenges, as well as regional implementation challenges with governance actors like neighboring states, ISO-NE, and others.
- **Incorporating Findings from Municipal Climate Preparedness:** A Better City recommends incorporating more of the findings of the Climate Ready Boston reports and the Greater Boston Research Advisory Group's 2022 report throughout the Assessment, as well as in the Boston Harbor regional finding section.