



July 29, 2025

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Senator Rebecca Rausch and Representative Christine Barber
Co-Chairs, Joint Committee on Environment & Natural Resources
Room 215 or 167, State House, Boston, MA 02113
JointCommittee.Environment@malegislature.gov

RE: A Better City's Comments on S.2542, An Act to Build Resilience for Massachusetts Communities

Dear Chairs Rausch and Barber:

On behalf of A Better City's 130 member businesses and institutions, thank you for the opportunity to provide comments on S.2542, *An Act to Build Resilience for Massachusetts Communities* (the Mass Ready Act). A Better City appreciates the Healey-Driscoll Administration's vision and leadership in supporting climate resilience in Massachusetts at a time when our communities and critical infrastructure continue to struggle with the threats of extreme precipitation, coastal and inland flooding, extreme heat, poor air quality, and more.

A Better City strongly supports S.2542 and urges the Committee to advance this bill. A Better City also offers the following recommendations for consideration in bill amendments: expand authorization for the Municipal Vulnerability Preparedness (MVP) Program; amend the new Resilience Revolving Fund; prioritize Clean Water Trust projects that address combined sewer overflows; implement a pilot study for urban tree planting; streamline permitting beyond Chapter 91 and the Wetlands Protection Act; maintain the Advanced Building Technology seat while adding other seats to the Board of Building Regulations and Standards; establish a Resilient Permitting Commission; and establish an Extreme Heat Task Force.

Thank you for your ongoing leadership and please reach out to Isabella Gambill (igambill@abettercity.org) with any comments or questions.

Sincerely,

A handwritten signature in black ink that reads "Kate Dineen".

Kate Dineen
President & CEO
A Better City

Cc: Chief Hoffer, Secretary Tepper, Undersecretary Antos, Assistant Secretary Mansfield

Recommendations Related to Proposed Bill Language for the Mass Ready Act

- **Expand Authorization for the Municipal Vulnerability Preparedness Program:** The Mass Ready Act's proposed bill language invests \$315 million into the Municipal Vulnerability Preparedness (MVP) program, but we have heard from member institutions, partner organizations like the Resilient Mystic Collaborative, and beneficiaries of the MVP program, that the current need for this program's funding is closer to \$500 million in the environmental bond, or up to \$100M per year.
 - ***Given the increased need for climate resilience initiatives, particularly those that address stormwater flooding, drought, and extreme heat, A Better City suggests that authorization for the MVP program be raised to \$500 million over 5 years (up to \$100 million authorization for MVP per year).***
- **Amend the New Resilience Revolving Fund:** The bill language creates a new Resilience Revolving Fund to provide for low to no-cost loans to municipalities, tribal governments, and public water and wastewater districts for shovel-ready projects as recommended by a newly formed Advisory Committee, which A Better City welcomes and strongly supports. This Fund could also be critical for supporting nonprofits and community-based organizations in their climate resilience projects, particularly those that approach climate resilience at a neighborhood or district scale, seeking to protect surrounding communities and critical infrastructure beyond the property boundaries of a particular project. Additionally, as written in the Mass Ready Act language, there will be an Advisory Committee for the Resilience Revolving Fund, consisting of a state treasurer or their designee, the secretary of administration and finance or their designee, the secretary of energy and environment (EEA) or their designee, one (1) member appointed by the Clean Water Trust, and one (1) member appointed by the Secretary of EEA. A Better City recommends that the Advisory Committee be expanded to include expertise in climate resilience, nature-based solutions, regional planning, and real estate sector development and/or management. Finally, all recommendations for Fund investments should prioritize regional and district-scale resilience investments that provide multiple co-benefits across climate hazards when possible.
 - ***A Better City recommends expanding the Resilience Revolving Fund to also include opportunities for nonprofit institutions and community-based organizations to access the program's low and no-cost loans for community climate resilience projects. Additionally, A Better City recommends that the Fund's Advisory Committee includes members that have expertise in designing and implementing climate resilient projects, particularly coastal climate resilience projects touching the waterfront and projects leveraging nature-based solutions, as well as regional planning associations, and real estate sector development and/or management. Finally, A Better City suggests prioritizing regional or district-scale resilience investments that provide multiple co-benefits across climate hazards whenever possible.***
- **Prioritize Clean Water Trust Projects that Address Combined Sewer Overflows:** The Mass Ready Act's language authorizes \$385 million for the Clean Water Trust to invest in clean water infrastructure remediation, public health, and utility upgrades, which will be especially helpful in the face of increased stormwater and extreme precipitation.
 - ***In considering investments to be made by the Clean Water Trust, A Better City suggests prioritizing projects that address repeated Combined Sewer Overflow contamination impacting public access points and beaches. Such projects will help to ensure coastal, riverine, and marine ecosystem health, while also protecting publicly-accessible beaches and public access points, a key strategy for providing heat relief and outdoor recreation.***
- **Implement a Pilot Study for Urban Tree Planting:** The Mass Ready Act's language specifically calls for evaluation and planning of forestry and tree planting projects, tree stock, and other costs, for priority of tree planting efforts in areas that experience urban heat island effect, have low tree canopy cover, have environmental justice

populations, and other critical needs, within the Forests as Climate Solutions plan. A Better City urges the Forests as Climate Solutions Plan implementation process to consider a pilot study to help inform urban forestry programs as they relate to urban heat islands with little street space for tree planting.

- ***Given the experience of tree planting efforts in Boston urban heat island neighborhoods, A Better City recommends including language for a pilot project to study tree planting efforts in locations with less access to sidewalk space for trees (e.g. Chinatown), as well as funding for tree maintenance and stewardship programs. A Better City also recommends prioritizing native trees, whenever possible.***
- **Streamline Permitting Beyond Chapter 91 and the Wetlands Protection Act:** A Better City continues to hear from members and partner organizations that innovative climate resilient projects, which are needed to protect communities, critical infrastructure, and nature, are unable to move forward due to limitations and bottlenecks within existing permitting structures. The Mass Ready Act’s language establishes a general license for marsh restoration, dam removal, wetland enhancement, and other nature-based climate resilience projects, in an effort to expedite permitting for housing and nature-based solutions projects, which A Better City supports, but is concerned that this does not go far enough to include waterfront climate resilience projects.
 - ***A Better City has long advocated for streamlined climate resilience permitting and recommends considering additional measures to support the advancement of waterfront climate resilience projects, like those proposed by the Wharf District Council. A Better City is concerned that the General License applies only to a limited scope of nature-based solutions—not green and grey interventions that will protect people and property from extreme weather. Additionally, the General License does not appear to exempt or fast-track any activities related to the MEPA process.***
- **Maintain the Advanced Building Technology Seat While Adding Other Seats to the Board of Building Regulations and Standards:** A Better City supports the effort to include new members of the Board of Building Regulations and Standards (BBRS) that will be able to help integrate climate resilience into Massachusetts’ state building codes. However, A Better City is concerned that these new seats are coming at the expense of needed input from the field of advanced building technology. As a key partner in PowerCorpsBOS’s building operations workforce development program, A Better City recognizes the need for smart building technology in order to achieve our emissions reduction goals in the building sector, and to ensure that net-zero buildings are operating at peak efficiency.
 - ***A Better City supports including experts in climate risk and climate-resilient design, as well housing development on the Board of Building Regulations—and strongly suggests maintaining the “advanced building technology” seat in addition to these new seats. As currently written, Section 59 (beginning on line 1655) of the bill language replaces the “advanced building technology” member seat on BBRS with these two new seats—this is imprudent given the demand for smart building technology in achieving our climate goals for the building sector.***

Other Recommendations Currently Missing from the Bill

- **Establish a Resilient Permitting Commission:** The Mass Ready Act’s proposed bill language takes an important step in streamlining environmental permitting related to housing and nature-based solutions projects but as mentioned above, does not go far enough to review environmental permitting delays impacting all climate resilient projects.
 - ***As suggested in prior advocacy, A Better City recommends the establishment of a Resilient Permitting Commission, similar and parallel to the Clean Energy Siting and Permitting Commission, to review existing permitting structures impacting climate resilience projects and recommend needed policy and regulatory reform to expedite climate resilience projects. This Commission could also help to inform the recommendations and work of the Resilience Revolving Fund’s Advisory Committee.***

- **Establish an Extreme Heat Task Force:** [H.3495](#) / [S.2244](#) *An act promoting resilience against the heat-related impacts of climate change* has several comprehensive measures to address extreme heat resilience, including establishing an Extreme Heat Task Force to coordinate cooling assistance for vulnerable populations and emergency preparedness.
 - ***A Better City recommends including this Task Force as an outside section of the Mass Ready Act, to ensure that the Commonwealth can coordinate on both short-term heat emergency response and long-term heat resilience, and to protect communities and critical infrastructure from increasing impacts of heat. This would help to build upon the leadership of the heat community of practice in Greater Boston and across environmental justice communities in Massachusetts.***