



## ENVIRONMENTAL JUSTICE STAKEHOLDERS FOCUS GROUP SESSION COMMENTS

March 29 – April 1; May 25 – 26, 2021

### ABSTRACT

EEA hosted EJ Stakeholder Focus Group Sessions in Spring 2021. They were attended by 232 EJ Stakeholders, as well as members of the EEA EJ Task Force and other state staff. Sessions were grouped by subject matter under the following titles: (1) Urban and Rural Land Preservation and Land Use, (2) Protection, Use, and Stewardship of Natural Resources, (3) Energy and the Green Transition, and (4) Urban Water Quality, Air Quality, and Toxics. The public comments and recommendations recorded in this document were received orally and in writing in March, April, and May 2021. In compiling these comments, EEA's EJ Program attempted to preserve the original tenor, perspective, and "voice" of the commenter as much as possible. The comments received are recommendations made by EJ stakeholders and are not the views of EEA or that of its agencies.

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## Community Engagement / Public Participation

### State Government Interaction with Community-Based Organizations (CBOs), Non-Governmental Organizations (NGOs), and members of EJ Populations

- Deep canvassing should be done to understand how to support and fund communities.
- There is a lack of cultural competence from both service and product providers targeting many of our underrepresented communities.
- Communities need more information during agency community engagement and enforcement.
- Reach out to community development organizations (such as Codman Square Neighborhood Development Corporation), neighborhood associations, and councils.
- Make a point of connecting to people who live next to toxic sites. This can be done through the CDC's and Boston Housing Authority.
- Dedicated listening sessions with communities are needed.
- List a contact person at each agency for individuals to reach out to and ensure listed contact can provide adequate responses.
- Make information more available for smaller grassroots organizations. Some communities do not have CBOs, so we must reach out in other ways.
- Further relationship building and where it is possible, co-facilitating and collaborating with CBOs.
- Provide grants to CBOS on the ground or pay them as consultants so they can do outreach work and provide the state with input.
- State legislature can play a role in connecting CBOs with agencies.
- Encourage collaboration amongst community groups towards shared goals.
- MassAudubon would like to do more EJ work. MassAudubon can do training, engage with schools, connect and listen, and work with youth preparing for careers in STEM.
- MACC hosts conferences with 800 people – this is a networking opportunity for the state.
- Pursue and include a notification and inclusion process for Indigenous communities that intersect with contemporary MA jurisdiction.
- I am unaware of the degree of outreach to Native communities, especially those outside of the typical "easy targets" - i.e., federally recognized tribes. It is not hard to do better.
- Lay out the path of decision-making that includes timeline of project and step-by-step process highlighting where community input will be incorporated.
- Provide an adequate timeline for trust building and non-traditional community outreach in state-led and state-funded projects.
- Provide trainings to individuals to understand the public process and encourage participation.

### State Government Interaction with Tribal Governments, Tribal Organizations and members of the Tribes

- Please provide better outreach and notification to the individual Tribes, the MA Commission on Indian Affairs, and North American Indian Center of Boston (NAICOB). Be cognizant that gathering, and connecting, is very important in the cultures of many Indigenous people. DPH and EPA models of outreach to tribes are good models to look into.

- Engage Native communities who have historical ties and interest in MA but are no longer residents.
- State recognized/historic tribes in the region are often ignored or completely erased from the narrative and often completely left out of the EJ and other equity conversations that affect their homelands by both native and non-native people. Inclusion and acknowledgment go a long way with Tribal nations.
- Train and educate state staff on aboriginal and treaty rights and responsibilities to better understand the Tribal communities that live amongst them and reside in the state. Be inclusive and sure that all historic Tribal communities are included whether they are State-acknowledged or Federally-recognized.
- Important for state agencies to read Executive Order 126 and educate themselves on the tribal groups that exist in the Commonwealth.
- Full implementation of a legal support framework for Rights of Nature, integrated with The United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP).
- The Tribes put great importance on the preservation of the former concentration camp sites that housed captive Tribal members that are connected to King Philip's War (1675-1678). They wish to prevent any construction on any of the sites or the areas adjacent until the sites have been properly identified and surveyed (as is normally done in any other country or any other part of the world that responsibly faces and addresses its former history of genocide).
- Is there a connection between MEPA and the Resilient MA Team? MEPA rules and regulations need closer review and policy changes to reflect the concerns of the EJ communities and Tribal nations in the region. Many disastrous projects appear to avoid regulatory and environmental review due to technicalities that allow the continued deforestation and other degradation and assaults on our historic and ancient Tribal lands.
- MEPA is unknown among many tribal/First Nations governmental officials. MEPA should commit to educating tribal officials so they can understand and participate in MEPA process.
- There is lack of follow-through on MEPA requirements. In many instances, community members can't get the agency attention for enforcement. This is especially true of Tribal issues and requirements for project proponents to engage the MA Historical Commission.

#### Necessity for "Plain Language" during Outreach, Communication, and Engagement

- Public comment periods and hearings can, contrary to intent, be disempowering and intimidating.
- State announcements can have a lot of jargon. Turn messaging into plain language (Why people should care and how it relates to them practically). Use plain language and explain what the project/proposal/ issues mean regarding real lives.
- Use plain language when communicating. The recommendation is to keep writing below an 8th grade reading level to reach most communities--6th grade and below is even better.
- Participants should not have to be environmental lawyers or consultants to navigate state government and get help about their concerns.
- Funding to communities needed to get independent experts to look at these projects to bridge this gap of technical understanding.
- Engagement with graphics and visuals can be helpful to explain technical information.

#### Provision of Language Services

- Please inform interpreters of relevant material before public meetings to make sure that vocabulary will translate appropriately to community members.

- Please do a better job of translating materials and webpages.
- Before outreach sessions, please bring staff that are conversational in languages spoken in the communities and speak on programs and how to access them.
- Translations and language services are needed in many different languages for outreach during the development of new regulations. This is right now true under the new sewage notification statute. Also, languages services are needed for advisory on combined sewage overflows.

### Process of Community Engagement

- State agencies need meaningful outreach to communities. This outreach should be guided by a target plan that incorporates specific municipality, community, and local considerations to identify stakeholders and have quality engagement.
- Make community engagement an integral part of decision-making.
- Provide context with stories of how community members and residents have changed the trajectory of a policy or impacted change to give them hope that their input will be listened to and be impactful.
- Feedback provided by community members should be acknowledged and considered. Please show how the feedback was used and provide a response.
- Post any public comments online to promote transparency.
- Go out to communities, do not expect them to come to you. Urban farmers' markets, food trucks/vans, food distribution centers, are some non-traditional ways to do outreach. Go where people are already congregating.
- Use the MBTA and Regional Transit Authority bus, bus stop, and waiting areas to provide simple signage in multiple languages or in easy-to-understand symbols.
- Invest in community ambassadors that are trusted by the community and provide them with resources to facilitate discussions (agendas, facilitator guides, other materials).
- Bring staff that are conversational in languages spoken to these communities and speak on programs and how to access them.
- Make meetings more interactive (small group discussions, check-in questions, polls, etc.).
- Use clubs and places of worship, libraries, high-school groups, housing advocates, social service providers, youth services, cultural shopping centers, and mutual aid groups to get the word out. Think broadly and don't just "go to the choir."
- Youth are often left out of the conversation. Provide opportunities for them to get involved, preparing them for careers in STEM education.
- Provide transportation to residents of EJ communities who do not have access to nearby public transportation.
- Hold public meetings in towns adjacent to where projects are occurring.
- Include housing advocates and other social service providers into conversations, especially in considering Green/Climate gentrification.
- Engage with hospitals and clinics so they are contributing to community resilience.
- Transparency of access is an important component. Make it as easy as possible for people to get their thoughts in.
- More time is needed to review and comment on documents and projects.

- Inform residents about public hearing and comment periods in advance.
- Early community input is as an opportunity to create benefits to the community.
- Statutes and deadlines can and should be revisited. They should be flexible and change with the needs of the community.

#### Use of Technology, Virtual Platforms, and Social Media

- A Twitter account specifically for EJ purposes would be helpful for sharing EJ related opportunities to stakeholders.
- Zoom format has opened up access so people don't have to drive to places, but there are also broadband and connectivity issues (the Commonwealth needs to acknowledge broadband issues and what state government is doing to address it). Please maintain a hybrid of Zoom, phone, and in-person meetings.
- Virtual meetings have given more flexibility in scheduling and discussions, but also tend to diminish participation and engagement in discussions and meetings. People aren't able to look each other in the eye and interpret body language as they would in person. Some people get lost in their own space in virtual work. Being in a space together forms more of a bond.
- Have virtual public comments, public comments by phone and email, in addition to in-person.
- Use closed captioning during Zoom meetings and two-way language translation.
- Advertise meetings as "Join by Zoom or Phone". Include instructions on how to use zoom functions (mute/unmute, raise hands, chat box), remove requirement to register in advance, be able to call in without a registration.
- Provide other ways to engage besides going to a meeting (ex: recordings with option to email comments)
- Ensure people have access to info via email, phone, and traditional mail.
- Add environmental justice framework to existing agency webpages.

#### Benefit of Pre-Meetings and Pre-formal Community Engagement

- EFSB w/ EEA support should have advanced conversations w/ communities that are being impacted and the project proponent.
- Project proponents should prerecord and release a video of the presentation that the proponent plans to give at the public meeting about the project, and do so in multiple languages.
- How can the state provide incentives and guidance for developers to work with communities much earlier in the process?
- Is there a way for companies / businesses to post information of pollutants in the business' window, such that community members can see what is being used there and be aware?

#### General Issues

- Have residents from BIPOC communities sit on task forces, work groups, and boards so they are at the table when agencies are creating Roadmap Bill programs and for any concerns/decisions that will affect them. Provide compensation.
- Commission of farmers of color to talk about how policies, investments, and programs can work to address those inequities.
- Provide EJ Training for conservation commissions to engage with EJ Populations.

- “Reverse 911 call” which goes out city-wide and allows folks to tap a button and listen to the meeting via phone. Groups have worked with City of Taunton, City of Pittsfield, and Mayor’s Office and local TV to do this.
- Can there be one email or phone number to which to submit an inquiry from a resident or community member? Many participants of the focus group mentioned the use of 311 when seeking information. Can agencies use 311 as a tool?
- Make outreach about things people can do, about something that affects them, participating in decision-making coming up, rather than simply telling people what the agency is doing. Invite the public to share a story about themselves, rather than eliciting a response to a technical question.
- Very few people in coastal communities are aware of projects going through processes that include a public comment period. More broad announcements of these opportunities (with some simple instructions) to comment might bring in new voices.
- Have EJ regional coordinators, who are present in these communities, who act as liaisons to connect residents and CBOs to programs and help navigate state government.
- Notify residents about sewage overflows and impacts regardless of type of sewage. Make the language equitable and that the notification is reaching people (not just on a website). Signage at sites themselves and downstream, electronic marquees, ads in the train station.
- There are sometimes assumptions about what communities want. The people who show up and have the time to show up to meetings may want something different from the rest of the community.
- Focus at a very local neighborhood level to understand the barriers around accessing state programs and how to address those barriers.
- Timing of a lot of the meetings is inconvenient for working people. Provide childcare and other accommodations. Provide children with their own child-friendly version of the information being provided at the meeting.
- Ensuring equitable access to meetings by hosting meetings and sessions in EJ communities and near public transit.
- Statutes and deadlines can and should be revisited. They should be flexible and change with the needs of the community.
- Please develop a publication that comprehensively informs of every funding opportunity at the state level – cross secretariat- that is released at regular intervals (yearly, quarterly), published online.
- Neighbor 2 Neighbor holds 2 membership meetings every month to notify community of projects and other things going on in the community. Can EEA model this?

## MEPA

- Please have MEPA site visits occur during standard off-work hours, if possible: weekend, day-time (lunch), evening hours. Many people who want to attend cannot do so in the middle of a working day.
- The Environmental Monitor is not user-friendly, very technical, and hard to use to gather information. Please name projects by name and locations rather than by number as a very first step.
- Materials should be translated, and interpreters provided in project-specific appropriate languages throughout the MEPA process.
- Have a community meeting before the start of filing in the formal process (like an information session).

- Project proponent should be required to reach out to Community Based Organizations – before formal process starts. Once process starts, open any site visit or any formal comment period with informational session where proponent is required to present project and there is a dialogue – with back-and-forth questions and answers. Not just a presentation with one-way comments.
- Information session could take advantage of MEPA's strength of being able to look at project holistically. Therefore, possible mitigation aspects should be reviewed during the information session.
- Conduct training sessions across the state as to what MEPA is and how to participate. Perhaps a recorded online video that is available 24/7 with 2-3 Q&A sessions hosted by MEPA staff in-person or virtually in real-time.
- Consider the use of local cable companies for outreach.
- Failsafe Review standard is too high and difficult. Not sure whether it has ever been successfully invoked, but it could be used as a good tool for EJ matters. Please consider revising the standards for failsafe review.
- Cumulative impact of pollution assessment is the most crucial aspect of assessing a project.
- MEPA should be a place for all agency action to be coordinated.
- Many projects slip through the cracks of the Notice of Project Change. Project proponents do not file for it when they need to.
- The extensive use of state agency acronyms in speaking and writing is very difficult to understand.
- Listen to the community when they talk, particularly when addressing the consequences of the size of a project.
- Is there a connection between MEPA and the Resilient MA Team? MEPA rules and regulations need closer review and policy changes to reflect the concerns of the EJ communities and Tribal nations in the region. Many disastrous projects appear to avoid regulatory and environmental review due to technicalities that allow the continued deforestation and other degradation and assaults on our historic and ancient Tribal lands.
- MEPA is unknown among many tribal/First Nations governmental officials. MEPA should commit to educating tribal officials so they can understand and participate in MEPA process.
- There is lack of follow-through on MEPA requirements. In many instances, community members can't get the agency attention for enforcement. This is especially true of Tribal issues and requirements for project proponents to engage the MA Historical Commission.
- Please listen to communities when they say they want an EIR done, or if they believe a project is significant enough to trigger one.
- MEPA is very strict. The timelines are too tight for residents to respond to or comment on notifications, and there is no flexibility for neighboring residents to revisit decisions.
- Alternatives analysis is not taken seriously enough. This is true in revising proposals in terms of location, size, and other operating conditions. It is also true in looking into the availability of cleaner technological options to a generally polluting facility.
- Can there be a process that emulates the Technical Assistance Grants (TAG) grants in the Brownfields clean-up program?



## Permitting / Siting

### General

- Each agency should reflect on where there's been a project w/ significant community opposition in the past and how a strategy can be written to better address community concerns over projects, so it doesn't keep happening.
- End the practice of siting energy facilities in EJ communities. The practice of "mitigation" does nothing to protect the health of the residents and is only a tool by which the EEA and the industry have further degraded EJ areas by injecting monies that do nothing for the residents or practicing a form of cap and trade that, again, does nothing to protect already overburdened communities.
- Measure how many polluting industries are in EJ communities vs. well-to-do white communities. Consider a policy of locating polluters in the alternative until the numbers are equal. This will mean only industries that are clean and responsible get permits, which is as it should be.
- Provide better communication about situations where a decision has been changed because the agency applied an EJ lens.
- Make sure EJ policy is not just "checking boxes" but is done in a robust and meaningful way (qualitative not quantitative). Think about how Agencies can make substantive changes, not just changes in procedural things and public notices.
- If impacts cannot be avoided, always take the opportunities to leave a community better than it was when a facility is proposed.
- Seriously consider cumulative impacts.
- Create opportunities to rectify previously approved harmful projects. Look back at past wrongs and consider reversing or changing permits for facilities including East Boston Substation, Weymouth Compressor, and Wheelabrator Saugus, to name a few.
- Develop a system to hold project proponents accountable.
- Any requests for a permit should trigger a report that goes out to stakeholders and community members.
- Can there be an established structure for consultation? (Perhaps twice a year, and early in the permitting process).
- The state should require that climate resilience measures be part of every grant and permit application. There are projects going forward that don't help stakeholders adapt to climate change, e.g. new housing projects that take down trees (RMAT project on standards for state owned infrastructure).
- Provide consolidated way of providing protocols for permitting programs so all stakeholders are aware of the process (i.e. a user-friendly website accessible to non-subject matter experts).
- We are dealing with people's lives and lived experiences. We should not push for things that are not getting us to Net Zero and impacting public health.
- Activity and Use Limitations (AULs) are incentivizing more pavement because that land can't be used for anything else, which exacerbates the heat island effect. Look at these issues with a holistic approach. Most of these are in EJ communities.
- Is there a way for EEA to weigh in on digital billboards? There is a situation with Boston Bowl trying to site boards on I-93 and into EJ neighborhoods. It is within 300 ft of Neponset River and can cause a disturbance to habitats.



- State agencies should challenge Federal Energy Regulatory Commission (FERC) more often.
- The state needs to work with utilities to create a statewide plan that recognizes the number of electrical facilities needed as we aim to reach electrification goals and where we will site them. How do we do this in a way that is equitable and involves communities in the process?
- Trash incinerators are currently being subsidized by the State as renewable energy facilities and 5/6 of these are in EJ communities.
- Regulatory review processes and reviews are often unfair and do not take into consideration the impacts on the environment and the Tribal communities, or take into consideration the views of the EJ community or local Tribe.
- High threshold for intervener status is inaccessible to residents/ratepayers. Allow residents/ratepayers to enter intervener status in a simpler process. Also, there is some confusion on how to become an intervener and who can do so.
- There is a disconnect between what is put down on paper vs. what happens (ex: Same types of project approvals keep getting approved even w/ significant community opposition).
- It was good to see EEA reverse the decision on the Springfield Biomass Incinerator and begin to take steps to implement the Next Generation Climate Bill.
- EEA should require that proponents create plan/programs for protecting facilities from cyber-attack. Four unplanned releases occurred at the Enbridge compressor station in Weymouth, MA and the root cause analysis has been inconclusive. This creates concerns on the vulnerability of facilities for cyber-attacks causing malfunctions of dangerous facilities.

#### Siting Solar Projects

- State agencies have competing interests for land use. I.e., near town of Amherst in Shutesbury there is issue of 200 acres of forest being cut down to convert that land to solar panels. This decision contributes to global warming. Many in the affected communities are against this. Why clear-cut for the sake of solar? A workgroup should be created to address this.
- Please de-incentivize putting solar on land. Instead, the state should incentivize putting it on rooftops, parking lots and other developed places. Please implement penalties for clearing forest and farmland for solar use. The solar program is skewed to making it cheaper to cut down a forest rather than siting solar in a parking lot or on rooftops.
- In public interactions, many solar developers say the SMART program “supports” the placement of solar on open land.
- Can towns take over the management of these projects – smart development credits? Some towns have solar by-laws.
- There needs to be an educational component for siting solar panels.
- Can the state develop a holistic solar mapping plan? Acadia Center looked at rooftops and brownfields to incentivize siting.
- Can we incentivize the siting of solar close to where there is a demand for energy? That increases resilience in the case of a severe weather event.
- In solar program, the incentives are not high enough for the companies to put solar in the commercial areas, which would also be the EJ areas.

- Policies used by utilities must be improved. Credit should be given for decentralized energy sources such as solar panels, wind power, and energy storage.

### Enforcement

- Please consider the connection between law enforcement and black and brown people when considering park enforcement actions (and the history of trauma in enforcement in green spaces). There should be heightened awareness within the state staff. Could training to law enforcement personnel be provided?
- EEA agencies must do more for translations and language outreach and education on enforcement. A consideration is having an interpreter join an enforcement officer during work.
- EEA should go out into the affected community for meetings.
- Please enable a differential impact analysis for EJ communities regarding enforcement and other topics on which EEA publishes data.
- How can the state build communications into the community so there is an opportunity for them to engage and report when they see possible violations occurring?
- Connect with MA 311 as a tool for reporting environmental violations.
- It does not occur to people to contact the environmental police.
- Please have a hotline or email to alert agencies about environmental crimes. Does one already exist? If so, please get the word out.
- Utilize enforcement to fund some of the programs under restorative justice. How can we take some of the money from enforcement cases and use it to pilot things in EJ communities?
- Recently regarding Kings Cove Park Beach in Weymouth, there was a contamination issue, and community members had to be bussed to another location to attend a meeting.
- In Weymouth, there has been no signage of poor water quality and contaminated shellfish.
- In Weymouth, there has been no enforcement of mitigation for the compressor station, this is also a Chapter 91 issue under the license.
- There is lack of follow-through on MEPA requirements. In many instances, community members cannot get the agency's attention for enforcement.
- The Neponset River is contaminated with PCBs. Signs are needed at Tenean Beach in many different languages.
- QR codes can help as one way to reach out, but many people do not own a smart phone.
- Enforcement needed concerning the cutting down of mature trees in EJ communities – see the Shade Tree Law.
- Water quality – contaminated shellfish sites and none of the signage is translated.
- Tenean Beach doesn't have signs that say the beach is contaminated (keeps getting put on backburner. The only beach that DCR runs that is still contaminated. Mostly minorities visit this beach).
- Calpine Power Plant (Formerly Sithe)'s waterways license is from the year 2000. Waiting twenty-one years to implement simple requirements of signage is disappointing. We ask EEA to support residents to make sure these comply, and that non-compliance is quickly resolved.
- Timelines provided for enforcement would be helpful.

- Neponset River water is contaminated and there should not be any fishing. There might be a few signs now in various languages, but there definitely need to be more. Fish are contaminated and people are trying to fish there.
- Would be good to have some basic information put out to the public that there are laws protecting air and water quality and which agency to contact in case of violation, in multiple languages on the state website.

### Grant Disbursement

- Combuys is clunky and hard to navigate.
- Reimbursement grants are not feasible for EJ Populations.
- Grants that are “matching” do not work because it is very hard for poor, small community groups to find the match money. Perhaps the grant could exempt EJ Populations from the matching requirement?
- Promote better and more equitable access to grant and loan funding.
- Please simplify the processes for putting a grant application together. It takes a lot of time to do so. Could a grant application take a ½ hour to fill out, instead of a week?
- Could there be a common application for grants? For example, <https://www.mass.gov/guides/community-one-stop-for-growth>. A one-stop shop for grants (document or grant/funding viewer).
- Could there be a system for applicants to use a grant search engine to check off what they are looking for and then fill out a generic application to apply for multiple grants with one application?
- Meeting the deadlines for grants is difficult. Please have a rolling or flexible deadline for grant applications.
- Grant descriptions could explain up-front what type of grant project could be “competitive” so that applicants and state staff do not waste resources on applications.
- Could more projects be allowed an extended timeline to finish? One year is too short when dealing with the issues of EJ Populations.
- Streamline grant proposals with feedback. Allow applicants to put forward ideas prior to submitting a full proposal and get feedback on which program is the best fit. A common application would greatly help.
- Give advanced notice of grant opportunities, such as a calendar of important dates.
- Please have a way to provide coaching on grant applications and provide feedback before time and resources are invested into a full application.
- Please hold Basic 101 training around grants for organizations and individuals (annual or bi-annual), and a periodic training on available grants (perhaps biannually).
- Perhaps a portion of grants and other rebates/pre-bate programs can be allocated to EJ populations.
- Apply for technical assistance hours with state staff with a pre-application or letter of intent prior to filling out full application with pre-application meetings.
- Please have personalized emails, calls, visiting folks (when it’s safe to do so) when advertising grants. Could we have Twitter account to announce grants specifically for EJ communities?
- Please allocate state staff time to be used to reach out to EJ communities as part of the process for grant outreach.
- State agencies should collaborate to create joint funding initiatives for Community Based Organizations and communities.

- Different town departments are competing among themselves for state money. Sometimes this is destructive, but sometimes it is good – “more bang for the buck” if one town gets multiple grants.
- Provide grants that address the financial income barriers of traditional retrofits required before accessing new energy efficient technologies. For example, grants to fix a roof before installing rooftop solar, or grants to fix faulty wiring before installing energy efficiency technology.
- Please reach out to new communities (not the usual suspects) to convey what the grant is about.
- Immigrant populations often are unfamiliar with the concept of “grants.” Please explain in the grant documentation the real-life application of the grant and what it can do for the recipient.
- The language for grant application and disbursement is too fancy and vague. Makes it hard for lay people to understand information.
- Green space and energy efficiency should be required in every state supported project.
- Amherst has a wealthy population and a vulnerable population. We would like funding to deal with water quality concerns. Low-income populations have limited places to cool off and folks swim in contaminated areas/ i.e., Fort River and E Coli at a local popular swimming hole.
- More grant programs for EJ communities to purchase land should be made available. The MDAR Urban Agriculture grant has limitations. I would love to see a program that provides EJ communities with streamlined information about conservation funding sources that can be used to help finance a land purchase, and the technical assistance to secure such funding.
- Please prioritize proposals from within the communities themselves, or from businesses and organizations who are already serving the communities. Include representatives from the communities on the proposal review panel.
- Provide competitive funding opportunities to assist municipalities in converting municipal land to agriculture or dual use. Prioritize bids which are expected to have a large/lasting impact for underserved communities.
- Develop ranking system for farming lease applications. Application questions should include intended community impact, existing connection(s) to priority communities, applicant demographics including race, ethnicity, gender, age, and beginning or experienced farmer, and other priority categories. State-owned lands are a unique opportunity to practice affirmative action in land access.
- Every state-funded project should require green space to accompany it.
- Grants are needed to deal with wastewater and other quality issues, not just loans.
- Programs are not getting to multi-family housing, renters, and low to moderate income folks. Need to ensure that there are dollars approved to make this happen.
- Make sure that the lion's share of the stimulus, infrastructure, SRF, MVP and other moneys go to environmental justice areas and the less affluent parts of the state (whether they are officially environmental justice or not). As much of it as possible should be grants, not loans, and it should come with strings attached, that these towns need to follow best practices to protect their environment.

## General Comments

### Partnership and Collaboration (Cross-agency, cross-secretariat, CBOs)

- Please avoid inconsistency across agencies and work collaboratively with folks from all Secretariats because there is a lot of interconnectedness with issues.

- It is important that there are conversations between EEA, EOHEd and other secretariats where they can talk about strategies that prevent gentrification and keep people where they are as we introduce green things.
- As we bring more natural green spaces and energy efficiency into urban environments, how do we reduce gentrification as these places become more attractive? State can partner with/support community land trusts around anti-displacement, affordable housing.
- Smart Growth funding should be placed side-by-side with housing issues. Can there be coordination with Housing and Community Development to prevent gentrification.
- Need for state agencies and policies to look at decisions for programming and policy in a more holistic manner. This will benefit all and ties into the cumulative impact framing that many systems are interrelated and linked to the health of individuals, communities, and the state.
- Please have a cross-agency strategy to keep river access locations publicly accessible.
- EJ populations have real reasons not to trust the state. In the energy efficiency context, Community Based Organizations (CBOs) often work for the state's purposes without compensation. In the Transportation Climate Initiative (TCI-P) context, CBOs are being asked to co-convene and collaborate without compensation. This may be happening even in the permitting context. CBOs, which are almost always non-profit organizations, have a full roster of their own work, apart from assisting the state upon request.

#### Data, Mapping, Metrics and Reporting

- Address EJ outcomes for each program and make this data public.
- The state needs to measure and define equity (Programs are not getting to multi-family housing, renters and low to moderate income folks. Need to ensure that there are dollars approved to make this happen).
- Release annual report of farmer leaseholders.
- There seems to be a disconnect between the reports that are generated—which identify vulnerabilities and opportunities—and actual implementation of recommendations coming out of such reports, to the detriment of EJ communities.
- Agencies should do an evaluation on where they have placed their resources and share that information publicly.
- More environmental data needs to be collected on water and air quality in EJ communities. Many EJ communities across the state do not have the capacity, systems, and resources to collect this data.
- Include health into environmental decision making.
- State-developed science, mapping and technical resources need to be integrated with the social sciences.
- Ask the communities the state aims to serve when measuring progress of state EJ efforts.
- Appropriate metrics to measure progress in EJ efforts include:
  - health metrics of EJ population,s
  - harmful projects not approved in EJ communities,
  - surveys of EJ populations demonstrating increased sense of being listened to by state and local government,
  - increased presence/participation in public hearings/meetings by EJ populations,
  - more diverse workforce at EEA/agencies,
  - improved air, drinking water, and surface water quality in EJ communities, and
  - number of community members reached.

### Climate Vulnerability

- Climate Ready Boston is user friendly, and no technical experience required. Creating these types of maps statewide would be helpful so that people can put in inputs and see how their own neighborhood will be affected.
- RMAAT tool is a good way to create a streamlined process for assessing climate vulnerabilities so that projects in EJ communities do not get a “pass”. ResilientMA Climate Change Clearinghouse is also a great resource.
- Ensure that all presentations/discussions about flooding include inland flooding, not just coastal.
- Summarize what cities/towns should be doing regarding climate action (both mitigation and resilience) versus what they are doing (to identify areas of improvement).

### Water Quality and Access

- In Widett Circle, there are options for neighborhood level flood prevention.
- Concerned about run-off from land into water and the use of quick-release chemicals to fertilize. Natural lawns can be used as a tool to capture carbon -- only if these fertilizers are not used.
- MWRA is analyzing septic sewage.
- There are limited places for people to cool off when it gets hot. People want to go swimming and some of the places where people go to swim might be contaminated. Identify locations where contaminant might be introduced to water, provide funding to do testing in towns to narrow down where issues originate and how to address them.
- There are real issues around access to blue space (water). Folks who live in certain communities don't have access to clean recreational water.
- Public access to waterfronts and tidelands, as guaranteed by Chapter 91 Waterways, needs to be considered in all applications. In the case of the Fore River Basin, access needs to be revisited and granted and expansion into the Designated Port needs to be considered.
- Water pollution is an environmental concern. State funding is needed for updating water infrastructure in EJ communities (with a big focus on lead service line replacement).
- Data shows numerous criteria pollutants in the Fore River Basin well above safe levels and cumulative numbers have been ignored.
- Communities are offered money to be sites for contamination. No community should feel financial pressure to accept something that threatens their water supply or environment.
- Communities like Lawrence feel demonized for Combined Sewage Overflows (CSOs) by more affluent communities downstream (like Newburyport). No one should be discharging sewage into rivers or swimming in it downstream. (Plenty of low-income communities are also downstream from CSOs).
- Water quality is a concern due to Sanitary Sewer Overflows (SSO), industrial pollutants historically dumped in the Fore River and Quincy Bay, and the toxification of the fisheries and shellfish in the Basin area.
- Steps need to be taken to prevent the Sanitary Sewer Overflows (SSO) and residents need notification when and where they are happening so that they may avoid the contaminated areas.

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- The Town of Braintree and the MWRA did not list any sanitary sewer overflows into the Fore River from the manholes right on the tidal shore of the Fore River. However, manholes in East Braintree have metal grates on top to allow the sewer manhole caps to surcharge like a geyser to not lose the caps. Are these permitted discharges? How often do these sewer manholes discharge?
- Industrial wastes dumped into the Fore River and the Town River and migrating into Quincy Bay and Boston Harbor have contaminated shellfish, lobster, and fisheries in this area.
- Encourage the implementation of wetlands as a strategy for improving water quality in urban areas. Encourage more nature-based solutions in EJ communities.
- Fore River Residents envision a better future in which the Fore River Basin and its tributaries are restored and are safe to swim, boat, fish, shellfish, and paddle and are neighborhoods where people can breathe clean air. Envision more access to their rivers, waterfront, and tidelands.
- The MWRA's East Braintree Siphons have many cracks and holes and are in poor condition. Saltwater is likely intruding at this location and raw sewage may flow out of the cracks and holes during and after rain events. Too much infiltration of salt water with sea level rise threatens the viability of the Deer Island Wastewater Treatment Plant.
- Translations and language services are needed in many different languages for outreach during the development of new regulations. This is right now true under the new sewage notification statute. Also, languages services are needed for advisory on combined sewage overflows.

### Air Quality

- Communities are doing their own air quality monitoring. The state should be doing the monitoring or providing funding for communities to do so.
- Remove diesel buses and prioritize electric buses in EJ communities in actual implementation. (Attendee specified Nubian Station in Roxbury).
- There are air quality issues in East Somerville and East Cambridge because of highways.
- The EJ Legislative Roundtable is pushing for legislation (HD2696, SD1742) that would establish baseline air quality conditions in pollution hot spots and asking the state to reduce pollution in those areas and make that air quality information accessible.
- Please fund filtration in places like schools, nursing homes, prisons/jails, etc., locations within transit heavy areas. State resources dedicated to programs to do these things and prioritize areas with EJ populations first.
- How can the state undo air quality burdens of EJ populations? Air pollution and asthma rates are high in EJ communities. The state should prioritize air filters, monitoring, and pushing for legislation that is going to keep children of color safe.
- Three trash-to-energy incinerators are near 3 gateway cities. This should not be.
- South Shore community is caught in a position that EEA is now mandated to consider cumulative emissions, but they are not protected.
- Concerned that the proposed new bus depot in Quincy that would add significant diesel pollution near the same EJ communities impacted by the compressor station. They host the most polluting MBTA buses in the entire system and have requested a new bus depot with all zero emissions electric buses.



- EEA needs to closely monitor data from the recently installed AQ monitor in Fore River Basin, and if AQ pollution is above safe limits, investigate the source and act to correct it until the air measures consistently within safe range.

#### Funding and Programming

- One of the pre-requisites for funding for Electric Vehicle (EV) charging stations was that they be located inside EJ communities. This pre-requisite is tone deaf. If the state is putting this out there, I think that it is not paying attention to the limitations and barriers of EV's in EJ neighborhoods. Funding could be re-directed or needs to be applied in a more equitable way. It does not feel accessible to people. Some people take offense to that "located in EJ communities" requirement.
- Communities without capacity do not get help from the state. Can there be an effort at capacity-building?
- State does not provide feedback for why Community Based Organization projects aren't listened to/implemented, and does not inform on how to get community ideas and projects implemented. Please provide that feedback.
- Increase access to clean technology and electrification for income-eligible households. Allocate financial resources in the LEAN Program towards battery storage. The LEAN program continues to rely heavily on gas.

#### Infrastructure and Development

- Link affordable housing developments with clean energy programs automatically rather than having advocates on the ground doing the work.
- There should be real annual funding secured to help affordable housing developers meet new climate-related efficiency targets and to cover the additional costs related to adding solar or measures such as heat pumps.
- Electrification of the Fairmount Line should be a priority.
- Smaller grids can provide more resilience.
- Allow for and incentivize infrastructure improvements.
- There is an influx of infrastructure money coming from the federal government (with a portion focused on lead pipes). The state should think about how to prioritize the distribution of this funding to EJ communities and roll it out efficiently and effectively. Apply 40% of infrastructure investments towards EJ communities.
- Cooling systems as well as flooding systems should be put into place as the effects of global warming are becoming more evident, mainly in public housing units.

#### Workforce

- Green transition provides opportunities for workforce development in a cross-secretariat way.
- In the offshore wind siting and energy siting generally, please remain aware of the needs of youth and the need for increased jobs.
- MassCEC workforce development programs require a college degree. This excludes a lot of people in BIPOC communities. Codman Square NDC has a Green Infrastructure Training and Certification program that is successful and requires a GED rather than college degree. Could something similar be developed?
- The average age of employees working in drinking water infrastructure is between 50-60 years. These jobs should be advertised to a younger group with targeted training programs established.

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- Fore River Shipyard helped build ships for WWI and WWII. Would be great to be part of the new clean energy and transportation solutions. I would love to see Wind, Solar, Storage and Electric Transportation rather than fossil fuel companies in the Fore River Basin.
- Tap into partners like Roxbury Community College, Benjamin Franklin Institute of Technology, Bunker Hill CC, Madison Park (and other community colleges) and Boston Green Academy to encourage partnership, more hiring of BIPOC, and highlight and promote their work.
- Create targets such as half of all jobs created through the Roadmap Bill should be set aside for BIPOC residents.
- Ensure that the agencies and contractors involved in the projects represent a broader diversity -- racially and geographically. The more that the people making the decisions have deep roots in the community, the less likely we are to have decisions that adversely impact that community.

### Land Access and Ownership

- Extend the maximum lease term allowable on state-owned land to make state and municipal land more accessible to EJ communities and increase land ownership among EJ communities so we can build more community-centered food systems.
- Identify properties particularly suited to community-focused agriculture with close proximity to urban centers.
- Release annual report of farmer leaseholders.
- Allow for subdivisions of current parcels. Many parcels are perfect for agricultural uses but are large and are difficult or near-impossible for farmers with limited capital to properly steward. By allowing parcels to be subdivided, the state will create more opportunities for small-scale agriculture to succeed.
- Work with the Bureau of Community Health and Prevention and the Office of Health Equity to identify high-priority communities in both urban and rural settings and the state/municipal land parcels which might serve these communities. Evaluate the suitability of these parcels to meet the needs of the communities, including soil quality, contamination issues, and accessibility.
- Solicit proposals for use of these (state) lands and provide administrative support to municipalities who are interested in using their own lands. Advertise opportunities in the affected communities and in languages spoken by residents of the communities.
- Suburban land trusts have played a major role in uneven ownership and access to homes. These land trusts have contributed to injustice.
- Ensure equitable access to rivers, green space, and trees – specifically protecting and increasing public access to waterways and natural resources in EJ communities.
- Green spaces must be conserved across whole areas, not just in particular neighborhoods, given their economic and psychological benefits.
- Provide access to state public land that is not being utilized by agencies and quasi-agencies such as MassPort, MassDOT, DCR, DCAMM, and others to provide long-term, low-dollar access for projects focused on and originating from our communities.

### Food Access and Waste

- Important for people in EJ communities who do not grow for themselves to have access to healthy, affordable, local food.
- Difficult for vendors to get certified to accept SNAP/HIP. Few customers know they can use HIP/SNAP at farmer's markets; please get the word out.

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- It is important to consider food waste as part of the EJ/Climate Change conversation.
- Change ‘revenue requirements’ to ‘production requirements’ and allow for community farms & gardens.
- Allow for direct sales from the farm site.

### Outdoor Recreation

- Strengthen partnerships with outdoor recreation organizations that take a social justice lens/approach. Organizations like Outdoor Afro do awesome work at a grassroots level of bridging the "nature gap". I personally would love to see the EEA do a better job of empowering/supporting existing activists that are bringing communities of color into the outdoors.
- Share information about how to use GIS to better grasp what land that is accessible for public recreation in urban spaces. Easily finding a park or green space is a privilege and it would be nice if there was a compiled set of resources that highlight where people live in proximity to parks. That software and feature might already exist, but the public doesn't know how to access it at this point.

### Other

- The air and water quality problems due to siting, pollution, and overflows are denying the constitutional rights of residents of the Fore River Basin under the Constitution of the Commonwealth of Massachusetts Article 97. The constitution states, “The people shall have the right to clean air and water, freedom from excessive and unnecessary noise, and the natural, scenic, historic, and esthetic qualities of their environment”.
- Make accommodations for communities that have lost their ability to fish for sustenance and not just recreation or sport.
- Please think about how agencies can make substantive changes, not just changes in procedural things and public notices.
- Update environmental laws and regulations (Wetlands Protection Act, Chapter 91, etc.) to include climate change and EJ considerations.
- One thing to commend DEP on - in response to a coalition request, they extended the public comment period for the 303d list of integrated waters by about a month. We are grateful for that extension! There is a ton of data to sort through so our member groups need more time to comment meaningfully.
- DOER's 3-year energy efficiency plan did not incorporate recommendations from various Community Based Organizations (CBOs) and EJ community members into their draft.
- Advocate for an office of Outdoor Recreation (there's a bill in legislature). Some states have created this office and have an EJ and Public Health angle.
- Justice requires thinking outside the box of expected outcomes.
- Think beyond urban, anthropocentric norms.
- Power outages and the ability to stay cool/warm during summer/winter is an equity and EJ issue.
- Cooling systems as well as flooding systems should be put into place as the effects of global warming are becoming more evident, mainly in public housing units.
- Concerned there is no adequate evacuation plan or emergency response plan to deal with climate emergencies (such as coastal and inland flooding) in EJ communities where there is a concentration of polluting industries.

*End*