



July 22, 2025

Senator Becca Rausch, Senate Chair
Representative Christine Barber, House Chair
Joint Committee on Environment and Natural Resources
State House Room 215
Boston, MA 02133

RE: S.2542 An Act to build resilience for Massachusetts communities

Dear Chair Rausch and Chair Barber,

On behalf of the Northern Middlesex Council of Governments (NMCOG), one of the 13 regional planning agencies in Massachusetts, I am writing to express strong support for S.2542 An Act to build resilience for Massachusetts communities (“the MassReady Act”). Authorizing nearly \$2.9 billion in funding, which would increase investments from the prior environmental bond bill by nearly 21%, the MassReady Act is comprehensive legislation designed to bolster climate resilience, environmental sustainability, and community preparedness across Massachusetts. The bill serves as a roadmap guiding appropriations for many existing and critically needed programs, as well as new programs and policies. The bill also includes new and innovative approaches to address resiliency.

The Act authorizes substantial investments across a wide range of initiatives, including upgrading environmental infrastructure, fortifying coastal and inland areas against climate change impacts, restoring ecological habitats, enhancing recreational spaces, and supporting biodiversity conservation. The Act also includes provisions to modernize water and wastewater infrastructure, mitigate the impacts of hazardous materials, and ensure the protection of public health through improved environmental monitoring. Additionally, it introduces policies to support sustainable agriculture, preserve forest lands for carbon sequestration, and strengthen food security.

Key provisions include funding for the Department of Conservation and Recreation to improve public parks, recreational facilities, and urban forestry to mitigate heat islands and enhance green spaces. Significant funding is dedicated to the Department of Environmental Protection to address water pollution, PFAS contamination in drinking water, and waste reduction. The bill allocates funding to the Department of Fish and Game for river and wetland restoration, biodiversity initiatives, and improving public access to fishing and boating facilities. Furthermore, the bill establishes a Resilience Revolving Fund to provide low-interest loans to municipalities for climate-resilient infrastructure projects, such as flood control and coastal defense systems.

Regarding funding to address inland flooding and coastal resilience, NMCOG encourages the Commonwealth to focus on the expected life cycle of capital investments. Major infrastructure projects addressing projected sea level rise and coastal erosion must be evaluated not only for immediate need but also for long-term viability to avoid expending public funds on assets that may be functionally obsolete before the end of their design life. A climate-informed return-on-investment framework is essential to ensure fiscal responsibility and true resilience.

For the NMCOG region, the MassReady Act presents multiple opportunities for direct investment and technical assistance. NMCOG member communities can benefit from the Municipal Vulnerability Preparedness (MVP) program's expanded funding, which supports climate vulnerability assessments, local adaptation planning, and implementation of resilience projects. The extensive funding for dam repair, flood control, and inland waterway improvements will help address regional concerns such as flood risks along our riverways and tributaries. Moreover, grants for sustainable forestry, urban tree planting, and green infrastructure will improve environmental health and public spaces in urbanized and underserved parts of the region, including Lowell and surrounding communities.

Additionally, NMCOG can leverage funding for regional planning initiatives, land conservation, and smart growth efforts that align with climate change mitigation and adaptation strategies. The Act's support for sustainable housing through MassHousing's Momentum Fund will aid efforts to increase the production of mixed-income housing options with a focus on energy efficiency and sustainability, critical for addressing housing needs in growing communities within the NMCOG region. Overall, the MassReady Act provides a comprehensive suite of financial resources and policy tools that NMCOG and its municipalities can tap into to enhance resilience, promote environmental justice, and ensure sustainable regional development.

Based on the MassReady Act, NMCOG communities are well-positioned to pursue funding through various programs for projects that directly align with regional priorities in infrastructure resilience, environmental restoration, climate adaptation, and sustainable development. For example, all of our member municipalities have participated in the Municipal Vulnerability Preparedness (MVP) Program, with eight receiving MVP Action Grants since FY20 totaling approximately \$2.7 million. One of our member municipalities also received a FY25 MVP 2.0 grant. We believe that there is great demand for this program and that the funding amount should be increased to \$500 million. Given the number of nonprofit partners engaging in climate discussions in our region, we applaud the inclusion of nonprofit organizations being able to receive these funds. Further, we believe that many additional projects could be funded with these funds including advancing regional climate resilience planning for the Merrimack River watershed, increased green infrastructure to address heat islands and flooding, and providing nature-based solutions for flood mitigation in flood-prone communities.

The NMCOG region would also benefit from dam, flood control, and inland flood management for the repair and retrofit of aging dams in the region, including in Billerica and Dracut, and reestablishing fishways or aquatic habitat improvements in local waterways. There are at least four significant dam maintenance and removal projects under review and in design that will benefit from this funding source. NMCOG's recent work on mapping flood vulnerability with the other regional planning agencies as part of a statewide EEA-funded project, show that the region will benefit from funding for nature-based solutions to address inland flooding especially along the Concord and Shawsheen Rivers.

The Urban Forestry and Tree Planting Programs would help with the expansion of urban tree canopies and tree planting programs in Chelmsford, Lowell, and Tewksbury to reduce heat islands and improve air quality. These programs would also help to address invasive species and support tree health across the region. To ensure long-term impact, we recommend the Commonwealth invest in research and incorporate Traditional Ecological Knowledge to identify tree species and forest management strategies that are better suited to future climate conditions, including increased heat, drought, and pest pressure.

We applaud the addition of this funding to address costly PFAS mitigation and removal from water bodies, particularly public drinking water, and addressing issues in wells and other public infrastructure. This is critically needed and timely for communities like Billerica, Dunstable, Pepperell, and Westford. Additionally, NMCOG has been studying the potential for upgrades and expansions to existing water and wastewater systems, this funding would potentially catalyze upgrades to wastewater infrastructure that will improve water quality in the Merrimack River.

The NMCOG region will also benefit from funding for ecological restoration of wetlands, riverways, barrier removal and for biodiversity grants. Through our efforts with the Northern Middlesex Stormwater Collaborative, many of our communities may be interested in exploring the removal of outdated culverts or barriers to restore fish passage and improve flood resiliency and habitat biodiversity through wetland restoration projects.

With all of our communities recently creating or completing Open Space and Recreation Plans, the region will benefit from expanded MassTrails funding, including for the Bruce Freeman Rail Trail extension, and to improve parks in underserved neighborhoods, and to conserve critical open space to enhance recreation and ecosystem services in Billerica, Chelmsford, Dracut, Dunstable, and Lowell.

Funding food security, farm sustainability, and resilience presents an important opportunity to strengthen local food systems across the NMCOG region. Investments in community-supported agriculture, urban farming in Lowell, and local farms in Dracut, Dunstable, and Tyngsborough can enhance both environmental sustainability and community climate resilience. To maximize long-term

benefits, resources should be directed toward supporting the transition to climate-smart agricultural practices and upgrading infrastructure to withstand future environmental stressors.

The flexible and innovative climate-resilient infrastructure loan funding proposed through the Massachusetts Clean Water Trust could be used to flood-proof municipal infrastructure, ensure that resilient energy systems are installed at public facilities, and that our transportation infrastructure is designed and built to be more climate-resilient. In addition to funding infrastructure upgrades, we recommend the Commonwealth explore hazard insurance reforms to reduce long-term public exposure to climate risk. One-time buyouts or caps on state reimbursement for properties that experience repeated and significant weather-related damage would create stronger incentives for resilience while protecting public resources from recurring losses.

NMCOG supports a number of key funding provisions included in the bill as follows:

- 2000-7068 \$10 million for tree planting on public and private lands
- 2000-7082 \$120 million for MassTrails and grants for open space conservation and preservation and parks
- 2000-7086 \$9.5 million for dam removal and hazard mitigation for inland flooding
- 2000-7088 \$315 million for the Municipal Vulnerability Program
- 2200-7026 \$42 million for Hazardous Material Clean Up
- 2200-7027 \$27.8 million for capital investments in resource protection, climate adaptation, and decarbonization
- 2200-7029 Funding to Improve Water Infrastructure and Address PFAS
- 2800-7026 \$308 million for removing and maintaining dams
- 1100-2524 \$50 million for grants to municipalities, regional planning agencies, and others for capital improvements in climate mitigation
- 7004-4785 \$50 million for the MassHousing Momentum Fund

NMCOG supports a number of key policy provisions included in the bill as follows:

- Section 12, EEA Secretary may exempt certain housing developments from Environmental Impact Reports
- Section 17, Preservation of Agricultural Lands
- Section 57-59, add individuals with climate risk, climate resiliency, and housing development expertise to the State Board of Building Regulations and Standards roster
- Section 61, Residential Flood Disclosure
- Section 65, transfer of certain roads from DCR to MassDOT control and jurisdiction
- Section 73, develop guidelines for priority housing types

This is a pivotal opportunity to invest in the resilience and well-being of our communities. We urge you to support the MassReady Act and help ensure that the NMCOG region and all of Massachusetts are equipped to confront the challenges of climate change while protecting our environment, public health, and economic vitality for generations to come. All of this funding would directly advance NMCOG's regional priorities around climate adaptation, public health, flood mitigation, environmental justice, transportation, and housing resilience.

Thank you for your leadership and continued commitment to the preservation of the Commonwealth's natural resources. Should you have any questions, please do not hesitate to contact me at jraitt@nmcog.org.

Sincerely,

A handwritten signature in black ink, appearing to read 'J M Raitt', with a stylized flourish at the end.

Jennifer M. Raitt
Executive Director