



March 9, 2022

The Honorable Michael Rodrigues
Chair, Senate Committee on Ways and Means
State House, Room 212
Boston, MA 02110

The Honorable Aaron Michlewitz
Chair, House Committee on Ways and Means
State House, Room 243
Boston, MA 02110

Re: American Rescue Plan Act (ARPA) Investments in Environment and Climate

Dear Chair Rodrigues, Chair Michlewitz, and members of the Committees on Ways and Means,

Thank you for your leadership in recognizing that investments in water infrastructure, tree planting, and climate resilience, including the Municipal Vulnerability Preparedness program, are essential components of our COVID-19 recovery. This was reflected in your first American Rescue Plan Act (ARPA) spending legislation in the fall, and we were grateful for the opportunity to participate in that process. We are similarly grateful for the opportunity to continue to engage with you on a second tranche of investment. Together, we can ensure a full recovery and a green and healthy future, especially for those who were disproportionately impacted by the pandemic.

As you know, use and enjoyment of state, local, and nonprofit outdoor spaces and waterways dramatically increased during the pandemic. On average, outdoor spaces saw their visitation double, and some state parks saw a 300% increase in visitation.¹ And this trend continues – despite disturbing inequities in access. A recent report found high disparities in access to open space for communities of color and for communities with lower household incomes.² Specifically, households in neighborhoods with the lowest income quartiles tend to have half as much available protected land as those in the highest quartile. Additionally, communities with the highest proportion of people of color have only about 60% as much nearby protected land.

As the pandemic wears on, we understand better the relationship between access to nature, open space, and waterways and COVID impact and recovery. The communities that were devastated by COVID-19 are largely the same communities whose residents have limited access to open space. These residents continue to experience more halting and difficult recoveries.

¹ Google COVID-19 Community Mobility Report, June 23, 2020.

² Sims, Katherine R.E.; Lee, Lucy G.; Estrella-Luna, Neenah; Lurie, Margo; and Thompson, Jonathan R.; Environmental justice criteria for new land protection can inform efforts to address disparities in nearby open space (2022).

<https://www.amherst.edu/system/files/media/Incorporating%2520EJ%2520into%2520Land%2520Conserv-ERL-Manuscript%2520and%2520SI.pdf>

As you also know, since the first ARPA package was signed into law, the Department of Conservation and Recreation (DCR) Special Commission, which was required by an outside section of the FY20 GAA,³ published its report, and its conclusions are discouraging. Over the past eight years, state and local governments in Massachusetts spent \$32.65 per 1,000 people, and \$0.50 per \$1 million of personal income, on parks and recreation. On both measures, this ranks Massachusetts 50th out of the 50 states – dead last.⁴

It is in this context that we find ourselves disappointed by the de-prioritization of open space in the first round of ARPA spending. That package contained only \$15 million for investments in land conservation, public access, and deferred maintenance – a small fraction of the \$225 million we requested and less than one-half of 1% of the entire package. Again, Massachusetts is an outlier among our neighbor states. New Hampshire, for example, committed \$22.65 million in ARPA funds for parks and recreation last August, out of a federal relief package less than 10% the size of Massachusetts' first ARPA package.⁵ Many states invest in land, parks, and trails because they understand access to nature and outdoor recreation are a critical driver of long-term jobs and economic growth, a tool to improve physical and mental health, and a way to promote a more equitable recovery. These states seized the opportunity presented by new federal funds to enhance parks and recreation and grow their outdoor recreation industry.⁶ Massachusetts should, too. The U.S. Department of Commerce reports that outdoor recreation is a significant driver of the Massachusetts economy, with \$10.5 billion annually in added value to the state's GDP, directly supporting 114,000 jobs, and \$5.5 billion in wages and salaries.⁷ Yet, Massachusetts ranks 32nd among all states in value added outdoor recreation growth.

When you commit the remaining discretionary ARPA funds, we respectfully urge you to include at least \$210 million in investments for open space. This is in line with our collective request for \$225 million for that category from August 2021.

In addition, we respectfully urge you to include at least \$90 million in investments for ecological restoration. This is a reiteration of our request from August 2021.

We also support Gov. Baker's proposal to increase funding for Municipal Vulnerability Preparedness (MVP) projects, Division of Ecological Restoration priority projects, and other climate resilience projects using FY22 state budget dollars. While we were disappointed to see the House Ways & Means Committee remove it from the bill, we appreciate that there may be other opportunities for this funding. We strongly hope to see this investment, although we are agnostic about the legislative vehicle, timing, and source of funding.

Below, please find a breakdown of specific requests ARPA investments in these two categories:

³ See section 100 of chapter 41 of the Acts of 2019.

⁴ Department of Conservation and Recreation Special Commission. 2021. Prepared by UMass Donahue Institute. <https://www.mass.gov/doc/umdi-dcr-special-commission-report/download> p. 51.

⁵ National Conference of State Legislatures. 2022. ARPA State Fiscal Recovery Fund Allocations. <https://www.ncsl.org/research/fiscal-policy/arpa-state-fiscal-recovery-fund-allocations.aspx>

⁶ Flush With Federal Cash, States Invest in Their Crowded Parks. 2021. <https://www.pewtrusts.org/en/research-and-analysis/blogs/stateline/2021/06/23/flush-with-federal-cash-states-invest-in-their-crowded-parks>

⁷ U.S. Dept. of Commerce Bureau of Economic Analysis. 2019. Massachusetts Outdoor Recreation Satellite Account report. <https://outdoorindustry.org/wp-content/uploads/2015/03/Massachusetts.pdf>

I. Open Space and Recreation

We urge you to fund the creation and improvement of parks, trails, beaches, rivers, streams, and outdoor recreation opportunities, especially in underserved communities. This can be achieved by investing in public land, and by providing grants to nonprofit partners, such as land trusts and watershed associations, who are often responsible for helping cities and towns with planning, funding, and completing complex land and water conservation and restoration projects, and for leveraging significant private investments to complete them. Moreover, nonprofits have the flexibility and expertise to spend this money quickly and efficiently.

We request at least:

- **\$90 million** for programs and grants within the Executive Office of Energy and Environmental Affairs (EEA) and agencies to maintain, restore, and improve public access on state, municipal, and nonprofit parks, trails, conservation land, and waterways. Programs and grants may include, but are not limited to, DCR and Department of Fish and Game (DFG) deferred park maintenance, recreation, streamflow protection, and wildlife habitat restoration efforts, as well as grants to nonprofits to improve the condition of, and public access to, lands and waters in all communities.
- **\$95 million** for municipalities and nonprofits to dramatically increase the pace of new open space, including waterfront parks, urban parks, trails, bike paths, playgrounds, urban farms, community gardens, and green spaces designed to absorb heat, remediate stormwater pollution, and reduce flooding impacts. This could be through existing grant programs, like the Conservation Partnership Grant Program, the Local Acquisitions for Natural Diversity (LAND) Program, and the Parkland Acquisitions and Renovations for Communities (PARC) Program, or new ones. Funding should be prioritized for environmental justice communities and those that have been disproportionately affected by the pandemic.
- **\$25 million** for DCR, DFG, and the Department of Agricultural Resources (DAR) to acquire conservation land and conservation and agricultural preservation restrictions on working farms and forests, especially in critical headwaters, wetland, and estuarine areas.

II. Nature-Based Solutions for Climate Mitigation, Adaptation, and Resilience

Nature is our ally in the fight against climate change, and we appreciate you recognizing that last fall when you invested \$100 million in environmental infrastructure. That is a fantastic start and will contribute to meaningful progress in the deployment of natural and nature-based climate solutions. Natural infrastructure provides a significant opportunity to address climate mitigation, adaptation, and resiliency while also creating long-term jobs in communities across the state.

When we protect, manage, and restore natural and working lands (like forests, farms, wetlands, and waterways) we not only help protect our communities, but we also mitigate climate impacts. Natural climate solutions (NCS) in Massachusetts can reduce and remove an additional 1-2 MMtCO₂e (million metric tons of carbon dioxide equivalent) every year,⁸ the equivalent of taking ~215,000 to 435,000 cars off the road.⁹ NCS are now part of the Global Warming Solutions Act and statutorily required to be included in EEA's updated 2030 Clean Energy and Climate Plan.

⁸ Nature4Climate. 2020. See MA state profile at: <https://nature4climate.org/u-s-carbon-mapper>

⁹ EPA Greenhouse Gas Equivalencies Calculator. 2020. <https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator>

Invest in Ecological Restoration: We appreciate your generous investments in ecological restoration in the first round of ARPA spending. Nature-based solutions (NBS) projects have the potential to generate significant jobs while building more resilient communities, reconnecting aquatic systems, and improving access to nature. The Division of Ecological Restoration (DER) has found that for every \$1 million spent on NBS projects, 12.5 full time jobs are created or maintained.¹⁰ And the National Oceanic and Atmospheric Administration (NOAA) has found that their funding for coastal habitat restoration supports on average 15 jobs per million dollars spent and up to 30 jobs per million dollars spent on more labor intensive restoration projects.¹¹ Additional economic benefits of NBS projects include avoiding billions in costs for disaster recovery and repairs by providing sustainable flood protection services and helping municipalities meet mandatory water quality standards. Ecological restoration projects also create new opportunities for boating, fishing, hiking, birdwatching, and swimming, which support Massachusetts' outdoor recreation industries.

Massachusetts has more than 3,000 dams, including 328 that are considered “potentially high hazard,” according to the US Army Corp of Engineer’s National Inventory of Dams.¹² Dams are intended to control water, but can also degrade water quality, block the passage of fish and other animals, and detrimentally impact biodiversity. Removing hazardous and obsolete dams allows more natural water flow, boosts water quality and quantity, and reduces the risk of catastrophic flooding,¹³ while providing high quality, local jobs. We urge you to invest in restoration activities like these to protect communities and restore natural systems. Investments should include grants to cities and towns, as well as to nonprofit partners. There is also tremendous opportunity to leverage federal funding, particularly from the bipartisan infrastructure bill through NOAA, USDA, and FEMA, for this kind of work.

We hope the state will continue to make significant investments in ecological restoration, especially for projects of regional and statewide significance.

We request at least:

- **\$45 million** to remove 25 obsolete and unwanted dams statewide.
- **\$20 million** to protect up to 2,000 acres of headwaters land and restore 1,000 acres of wetlands on cranberry farmlands taken out of production by their owners.
- **\$25 million** for coastal and tidal wetlands restoration, including salt marshes, for climate adaptation and habitat restoration benefits.

Advance Municipal Preparedness: We strongly support Governor Baker’s proposal to invest \$150 million in FY22 state surplus funds in climate resiliency, through the Municipal Vulnerability Preparedness (MVP) program, DER priority projects, and other programs. As you know, over 90 percent of the Commonwealth’s municipalities are enrolled in the MVP Program and have prioritized action projects that use NBS and address equity. In the latest MVP action grant round, the state received 92

¹⁰ Massachusetts Department of Fish and Game (DFG), Division of Ecological Restoration (DER). 2015. Economic Benefits from Aquatic Ecological Restoration Projects in Massachusetts: Summary of Three Phases of Investigation.

<https://www.mass.gov/files/documents/2016/08/wi/summary-of-der-economic-benefits-studies-all-phases.pdf>

¹¹ Samonte et al. 2017. Socioeconomic Benefits of Habitat Restoration. NOAA Tech. Memo. NMFS-OHC-1.

<https://repository.library.noaa.gov/view/noaa/15030>

¹² U.S. Army Corps of Engineers. 2022. National Inventory of Dams: high hazard dams in Massachusetts.

[https://nid.usace.army.mil/#/dams/search/sy=@stateKey:MA%20@hazardId:\(4\)&viewType=map&resultsType=dams&advanced=false&hideList=false&eventSystem=false](https://nid.usace.army.mil/#/dams/search/sy=@stateKey:MA%20@hazardId:(4)&viewType=map&resultsType=dams&advanced=false&hideList=false&eventSystem=false)

¹³ Snyder & Associates. Dam Removal: An alternative to costly maintenance and repairs. <https://www.snyder-associates.com/dam-removal-benefits/>

applications requesting a total of \$28 million, while only having \$10 million available to distribute. There are many shovel-ready and-worthy projects with far reaching benefits for the Commonwealth that can be implemented as soon as funds are made available. Jobs associated with the kinds of projects supported by MVP action grants include planners, engineers, landscape architects, soil scientists, aquatic ecologists, construction workers, and more.

We hope the legislature recognizes this need in 2022, and funds MVP, DER, and other climate resilience programs through supplemental appropriation, federal COVID relief funding, or as part of separate climate legislation. These funds focus on critical projects of statewide significance; support implementation of the State Hazard Mitigation and Climate Adaptation Plan and other state and local climate resilience plans; and should be available to municipalities, regional planning bodies, watershed organizations, land trusts, and conservation and community-based nonprofits.

Thank you for your consideration of these recommendations.

Please contact Linda Orel at lorel@thetrustees.org or Emily Myron at emily.myron@tnc.org with questions. We look forward to continuing to work with you to ensure a green and just recovery for the Commonwealth.

Sincerely,

Linda Orel
Policy Director
The Trustees

Emily Myron
Policy Manager
The Nature Conservancy, Massachusetts Chapter

Michelle Manion
VP of Policy & Advocacy
Mass Audubon

Katharine Lange
Policy Specialist
Mass Rivers Alliance

Heather Clish
Senior Director Conservation
& Recreation Policy
Appalachian Mountain Club

Casey Bowers
Assistant Vice President
for Government Relations
Environmental League of Massachusetts

Robb Johnson
Executive Director
Mass Land Trust Coalition

Dorothy McGlincy
Executive Director
Mass Association of Conservation Commissions