



MASSACHUSETTS  
Rivers Alliance



April 10, 2023

The Honorable Aaron M. Michlewitz  
House Chair, Joint Committee on Ways & Means  
State House Room 243

The Honorable Michael J. Rodrigues  
Senate Chair, Joint Committee on Ways & Means  
State House Room 212

Dear Chair Michlewitz, Chair Rodrigues, and Honorable Members of the Joint Committee on Ways and Means,

Thank you for the opportunity to offer comments on the Fiscal Year 2024 Budget as you work to craft a comprehensive package that meets the Commonwealth's needs and prepares us for a prosperous, resilient future. The Green Budget Coalition advocates for robust, sustainable state funding for Energy and Environmental Affairs to meet the scope and scale of our climate, conservation, and adaptation challenges. We welcome the opportunity to share our priorities and provide information that details the critical needs we anticipate in the coming fiscal year.

Protecting the Commonwealth's land, water, air, and wildlife while supporting healthy communities and historically underserved populations, while meeting our ambitious climate goals, requires state agencies that are well-resourced and well-staffed. Currently, only 0.83% of the state's operating budget is spent on both energy and environmental programs. Despite steady, slowly growing investments in these agencies, funding has yet to return to the levels of the early 2000s. Funding levels have not been fully remediated when adjusting for inflation and staffing losses due to Great Recession cuts and early retirement programs, particularly in the technical science and engineering sectors.

At the same time, the statutory and regulatory obligations of these agencies have grown dramatically. The 2021 and 2022 climate laws and 2025/2030 Clean Energy and Climate Plans have significantly increased the role that state agencies play in supporting emissions reduction and climate response efforts. Throughout the COVID-19 pandemic, interest in outdoor recreation and use of publicly owned and managed lands exploded and demand for DCR services remains high. The rollout of new drought management regulations, the 2030 Solid Waste Master Plan, and growing awareness of the prevalence and risks of PFAS in our water supplies have increased DEP's monitoring and oversight responsibilities. And the impacts of climate change have made the habitat conservation, restoration, and management efforts of the Natural Heritage and Endangered Species program more pressing.

The Green Budget Coalition has identified the following programs as key environmental priorities for FY24. These priorities reflect areas of significant need and programs where targeted investments can work to significantly accelerate our progress toward the state's climate and conservation goals.

*Support H.1 funding recommendations in the following areas:*

**Core EOEEA Agencies:**

- **EEA Administration (2000-0100): \$18,172,987**

- ***Climate Adaptation and Preparedness (2000-0101): \$10,003,414***
- ***Environmental Justice (2000-0102): \$8,804,284***

EEA's Administrative Office is responsible for coordinating and implementing strategies for climate change adaptation and preparedness including the resiliency of the Commonwealth's transportation, energy and public health infrastructures; built environments; municipal assistance; improved data collection, analysis, and planning; and improved resiliency through the strengthening and revitalization of natural resources. Implementation of the 2021 Roadmap to Net Zero law and the 2025/2030 Clean Energy and Climate Plans require significant investment in the state agencies responsible for facilitating the state's climate response and clean energy transition.

Proposed improvements in H.1 include the establishment of a federal and regional leadership office and hiring of 14 new environmental justice coordinators to execute on equitable coordinated climate action. As of 2022, EJ Populations have been identified in 186 communities across Massachusetts, and staffing up the new Office of Environmental Justice is needed to provide training, outreach, and support for state agencies serving those communities in compliance with the new laws.

#### **Department of Conservation and Recreation State Parks (2810-0100): \$107,632,351**

In 2021, the legislative DCR Special Commission found broad consensus that DCR is chronically underfunded and overburdened, creating staffing deficiencies and service backlogs lasting decades. DCR currently has approximately 975 full-time equivalent staff (FTEs), an increase from last year but still below the 2008 level of 1,279. At the same time, DCR needs have increased dramatically. More people than ever before have visited state parks during the COVID-19 pandemic, and investments in climate adaptation and resiliency on DCR properties will become increasingly critical to ensure properties are prepared for impending impacts of flooding, drought, growth of new pests and invasive species, and more.

H.1 proposes a \$22 million increase for this item to address persistent staffing and maintenance shortfalls, to ensure preservation of ongoing DCR programs and partnerships, and to work to implement the recommendations of the Commission.

#### **Department of Public Utilities Administration (2100-0012): \$19,781,167**

In recognition of the key role that the Department of Public Utilities will play in meeting our climate goals, the coalition has included DPU as a priority for the first time. The Electric Power Division within DPU has taken on several new roles in recent years extending beyond reliability, including grid modernization planning, interconnection of renewable energy facilities, managing customer net metering programs, and transmission planning. In addition to creating direct new responsibilities for DPU relative to the implementation of the Clean Energy and Climate Plan, the 2021 Roadmap to Net Zero law also directed DPU to consider emissions and equity impacts of docket proposals it reviews, necessitating the hiring of more climate- and EJ-focused staff to fully meet its legislative mandate.

H.1 proposes a \$1.4 million increase to support increased hiring of staff to meet new and ongoing climate and clean energy obligations required of DPU in statute, particularly within the Electric Power Division and to support agency-level environmental justice work.

**Department of Environmental Protection Administration (2200-0100): \$51,969,763**

Massachusetts is experiencing increasing and intersecting threats to its water supply and vulnerable natural resources as climate impacts accelerate and new public health hazards are identified. MassDEP has a broad set of critical responsibilities, including ensuring clean air and water, watershed planning and permitting, the safe management of toxics, enforcing environmental laws, reducing solid waste, the timely cleanup of hazardous waste sites and spills, and the preservation of wetlands and coastal resources. The Department currently has around 80% of the FTEs it had in 2009 while taking on more responsibilities such as PFAS testing and mitigation, incorporating climate resilience measures in permitting, and developing and implementing a new framework for cumulative impact analysis. Early retirement programs have hit this department particularly hard and science/engineering staff have seen disproportionate cuts.

H.1 proposes a \$6.5 million increase to support an ambitious and necessary staffing plan, funding over 50 new DEP staff for critical work including PFAS testing and mitigation, inspection and compliance, and incorporating climate preparedness in permitting. The Department and Executive Office have identified allocating resources specifically for recruiting and hiring to make these staff increases possible.

*Support incremental increases over H.1:*

**Natural Heritage and Endangered Species (2310-0300): \$1,500,000**

MassWildlife's Natural Heritage and Endangered Species Program (NHESP) is responsible for the protection, management, and restoration of the Commonwealth's most imperiled animals and plants and the sensitive communities and habitats on which they depend. Currently, 432 native plant and animal species are listed as endangered, threatened, or of special concern under the Massachusetts Endangered Species Act (MESA). In the face of habitat loss, emerging diseases, invasive species, and climate change, NHESP's protection work is more important than ever. MassWildlife also oversees the BioMap web portal, which delivers the latest scientific data and resources to help state and local governments, land trusts, non-government organizations, and other conservation partners strategically plan projects to conserve wildlife and their habitats.

The Coalition recommends a \$500,000 increase over FY23 levels to support increased demand for services as well as the continuing rollout of BioMap3 and increased regional support. H.1 proposed a ~\$300,000 increase.

**Division of Ecological Restoration (2300-0101): \$4,300,000 (level funding with FY23)**

The Division of Ecological Restoration has over 140 active river and wetland projects across the state, including dam removals, wetland restoration, culvert upgrades, urban river revitalization efforts, floodplain and streamflow restoration, and cranberry bog restoration. All DER projects work to restore

healthy habitat and help communities adapt to climate change, while also generating significant economic benefits. H.1 proposes a \$500,000 cut to this line item, which would undermine the multiyear progress made toward increasing the capacity of DER to meet local demand for project support.

Requests for DER's technical, project management, and funding assistance far exceed DER's resources. There are 3,000 dams and 25,000 culverts and small bridges across the state, many of which are deteriorating and are vulnerable to threats from severe storms and flooding. Aging dams and culverts impact environmental health, public safety, municipal budgets, fish passage, and community resilience to climate change. Communities want to remove dams and upgrade culverts but lack the knowledge, technical skills, and funds to do so. In 2021, DER received applications from over 70 communities for culvert grant projects and was only able to provide assistance to 26 communities. DER currently begins roughly twice as many new restoration projects as it completes each year. Level funding will help the Division to ensure that project timelines stay on track and backlogs do not accumulate.

Thank you for your consideration on these important priorities and for your tireless ongoing work to shape the FY24 budget. Please contact Casey Bowers at [cbowers@environmentalleague.org](mailto:cbowers@environmentalleague.org) or 781-771-5404 with any questions or requests for additional information.

Sincerely,

***Green Budget Coalition:***

Environmental League of Massachusetts  
Appalachian Mountain Club  
Massachusetts Association of Conservation Commissions  
Massachusetts Audubon Society  
Massachusetts Organization of State Engineers and Scientists  
Massachusetts Rivers Alliance  
The Nature Conservancy  
The Trustees of Reservations

***Endorsing organizations:***

Acadia Center  
Charles River Conservancy  
Charles River Watershed Association  
Conservation Law Foundation  
Massachusetts Land Trust Coalition  
Metropolitan Area Planning Council