Dear Chair Michlewitz, Chair Rodrigues, Chair Hunt and members of the Joint Ways and Means Committees and House Committee on Federal Stimulus and Census Oversight:

Thank you for the opportunity to provide input on H.3922, An Act relative to immediate COVID Recovery Needs and the Commonwealth’s spending plan for American Rescue Plan Act (ARPA) funds.

As the statewide organization representing the Commonwealth’s 13 Regional Planning Agencies (RPAs), the Massachusetts Association of Regional Planning Agencies (MARPA) are the premier advocate for cities and towns to innovate in the delivery of municipal public services, to collaborate across municipal and regional boundaries, and to adopt planning best practices. Together MARPA members provide support to all 351 cities and towns in the Commonwealth. Our staff offer technical assistance on a variety of issues including transportation, housing, land use, climate change, and public health, and we share a common goal of improving the lives of Massachusetts residents.

RPAs were often the frontline coordinator to help our cities and towns address the immediate needs of pandemic response. This collaboration has continued as we work to advance an equitable and resilient recovery. **We urge that all areas of the Commonwealth receive the benefit of these federal dollars and that there be consideration of geographic equity.**

We welcome this opportunity to focus on priorities that will support the Commonwealth in a strong recovery.
MARPA urges the Legislature to use these historic funds to invest in those communities that have been disproportionately impacted by COVID-19 and were already experiencing systemic disinvestment.

We were glad to see the U.S. Treasury Interim Final Rule encourage states to prioritize investments in disproportionately impacted communities and residents and to give the state and localities flexibility to identify those residents who in fact experienced that impact. We urge the Legislature to center equity in recovery investments. ARPA funding should be prioritized for investments that address the historical and systemic inequities that led to the pandemic’s disparate impacts across the Commonwealth.

MARPA urges the Legislature to invest funding in planning and implementation.

Last year, the State launched the Local Rapid Recovery Planning (LRRP) program to provide municipalities with the opportunity to develop actionable, project-based recovery plans tailored to the unique economic challenges and COVID-19 related impacts to downtowns, town centers, and commercial districts. Awards were granted to 125 communities across the state. Communities over the past months have been developing locally driven, actionable strategies to support their downtown and commercial districts and benefit more than 15,000 small businesses across the state.

The Legislature should advance funding opportunities so that cities and towns can implement these plans to stabilize and grow the economy. LRRP plans have the potential to help communities become more resilient and responsive to unexpected challenges, but only if there are resources available to put them into action.

MARPA urges the Legislature to invest in local and regional public health.

Despite the dedication of local health staff and volunteers, the COVID-19 pandemic has revealed the inadequacies and inequities of our under-resourced and municipally-based local public health system — and this puts the entire state at risk. Unlike most states, Massachusetts does not have a county or regional system for local public health. Massachusetts has more local health departments than any other state in the U.S. even though it ranks 13th in the nation for population size and 44th in land area.

We urge the Legislature to allocate significant ARPA funds to address health disparities, enhance public health data systems, and support workforce development and training.

MARPA urges the Legislature to consider grant programs to support the water and digital infrastructure needs in the most impacted communities.

As you heard throughout the joint hearing on September 9th that focused on the areas of Economic Development: Transportation/Arts & Tourism/Climate/Infrastructure, water infrastructure costs are a large and growing concern throughout the state. From combined sewer overflows (CSOs), to Per- and polyfluoroalkyl substances (PFAS) remediation, culverts, and coastal flooding, water is impacting communities throughout the state in new and expensive ways with a changing climate at the heart of many of these concerns. The Legislative Commission on Water Infrastructure Finance’s Report in 2012 Chaired by Representative Carolyn Dykema and Senator Jamie Eldridge identified a funding gap of $23 billion over the next 20 years. This was
prior to the pressing challenges of responding to PFAS contamination and complying with the EPA’s MS4 Stormwater Permit. Over the last decade, only a fraction of the needed investments have been made.

In addition to the growing costs, there is a lack of federal funds to address these concerns and we anticipate that when federal funds are made available, they are likely to require a state or local match. In the absence of a designated federal grant program to address Combined Sewer Overflow legacy infrastructure and the harm they contribute to our waterways, Massachusetts’ municipal water utilities must finance the hundreds of millions of dollars of work left undone across the Commonwealth off the backs of ratepayers, many of whom reside in our poorest, urban communities. At the state level, utilizing the State Revolving Fund (SRF) program will allow communities to borrow funds, but they would be required to pay the state back, unlike almost all other programs proposed in this legislation that are explicitly only allowed to be grant programs. We urge you to create more grant opportunities to cities and towns for water infrastructure investments.

One creative way to address many of these challenges would be for the Legislature to use ARPA funds to provide the initial capital to start a Climate Infrastructure Bank. Initial investments by the Bank could then be spent in communities hardest hit by COVID, which are often the same communities most impacted by climate change. Bank investments could serve not only to bolster our water infrastructure, but also contribute to the funding and financing required to meet the climate crisis in the buildings, transportation, and waste sectors. Using ARPA funds to make a down payment toward critical infrastructure upgrades would position the Commonwealth well to take advantage of federal infrastructure dollars when they become available.

As you also heard during the hearing, the pandemic has highlighted the stark disparities in access to broadband. Between work, school and accessing needed services, access to the internet is going to remain a key feature of our lives for the foreseeable future. ARPA investments should address these disparities, so the hardest hit communities are not left behind. These investments would:

- Bring fiber access to public housing properties, schools community centers and other areas that are not adequately served;
- Facilitate data sharing, reporting and collaboration among municipalities, government agencies and other entities;
- Support digital literacy and digital access for underserved individuals; and
- Create digital access and equity plans or capital improvement plans for broadband infrastructure in communities.

As we build and rebuild our infrastructure, MARPA urges the State to ensure that our recovery advances our existing climate and housing goals.

While the 2021 IPCC Climate Report paints a dark picture, it also strongly asserts that humans can improve the future course of climate change. We need to pursue strong, rapid, and sustained reductions in greenhouse gas (GHG) emissions if we are to stabilize the climate and prevent some of the most devastating changes. As a major source of emissions in the Commonwealth, reducing emissions in the building sector presents a major opportunity for GHG reduction. Buildings consume 40 percent of primary energy annually in the United States and 54 percent of energy annually in Massachusetts when accounting for electricity, heating, cooling, and industrial processes.
We urge the Legislature to consider investments that reduce the carbon footprint of our new and existing buildings. These investments are expensive but critical, making ARPA investments an important opportunity to meet the challenge. Investments in better buildings will not only reduce emissions, but also improve public health outcomes, enhance resilience, and lower energy bills so that both renting and owning are more affordable. Smart investments would:

• Ensure new affordable housing is built to Net Zero or Passive House standards, which will enable longer-term resilience and lower operating costs

• Augment the existing LEAN and Mass Save programs to improve weatherization for low- and moderate-income residents, particularly renters, and others also historically underserved

• Supplement the federal Low Income Home Energy Assistance Program (LIHEAP) to provide electric and heating fuel utility bill relief in both the summer and winter

• Expand resources available for deep energy retrofits to public housing and multifamily properties

• Set aside funds for residents in communities of color and low-income communities to invest in clean heating and cooling systems, mitigating upfront capital costs and ensuring that we reduce – rather than maintain or increase – high energy burdens.

RPAs are dedicated to supporting our communities to become more resilient and creating the conditions that allow residents and businesses to thrive. ARPA funds are an unprecedented opportunity for the Commonwealth to make down payments to address some of the most persistent and complex challenges facing the public including climate change, public health disparities, housing affordability, and transportation access. These funds will last for only a few short years but if invested prudently, their impact has the potential to be felt for lifetimes.

Thank you for your consideration of this letter. If you have any questions, please do not hesitate to contact us at ldunlavy@frcog.org and jwalker@srrpedd.org.

Sincerely,

Linda Dunlavy
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