



City of Boston
Environment



City of Boston
Mayor Michelle Wu

Undersecretary María Belén Power
Office of Environmental Justice and Equity
100 Cambridge Street, Suite 1020
Boston, MA 02114

October 31, 2025

By Electronic Submission to ej.inquiries@mass.gov

Re: *OEJE Standards and Guidelines for Community Benefit Plans and Agreements*

Thank you for the opportunity to provide written comments on the draft *Standards and Guidelines for Community Benefit Plans and Agreements* (“Draft Guidelines”) filed by the Office of Environmental Justice and Equity (“OEJE”), outlining best practices for Community Benefit Plans (“CBPs”) and Community Benefit Agreements (“CBAs”). The City of Boston appreciates OEJE’s commitment to ensuring clean energy infrastructure development aligns with environmental justice principles while delivering meaningful, community-driven benefits. The City appreciates the creation of these standards and encourages OEJE to further emphasize the inclusion of CBPs and CBAs as a key component of the clean energy infrastructure permit application process. Early integration of CBPs and CBAs can ensure community benefits are thoughtfully designed, locally relevant, and aligned with municipal planning efforts. The City encourages continued collaboration with municipalities to support implementation of these guidelines and ensure local communities’ priorities are incorporated throughout the project.

As non-legally binding documents, CBPs outline how a project proponent will engage a community during development and operation of the facility, but lack the enforceability to ensure those benefits reach the intended communities. Without structured follow-up, these plans may fall short of the standards or commitments originally agreed upon by key stakeholders. The City recommends that OEJE amend this guidance to establish how to engage with municipalities throughout the CBP and CBA development process to ensure coordination with local planning, permitting, and community engagement processes. This collaboration would ensure community benefits are realistic, aligned with neighborhood priorities, and effectively implemented throughout the useful life of a clean energy infrastructure project. The City suggests that a post-construction review or report should be recommended to be included as a part of any CBP or CBA to assess whether the benefits are being delivered as promised and capture any lessons learned for future clean energy infrastructure projects.

The City appreciates that the Draft Guidelines emphasize the importance of centering environmental justice and overburdened communities. This focus is integral to ensuring that the benefits of clean energy infrastructure projects are distributed equitably and that communities most impacted by climate and environmental burdens are prioritized throughout the planning, design, and construction of projects. The City encourages OEJE to clarify the opportunities for local governments to provide additional guidance on how engagement can be tailored for local



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communities. The City is committed to identifying each of our community's needs and priorities and is well-equipped to provide this guidance to project proponents/ applicants.

In dense cities like Boston, engagement should account for neighborhood diversity, language accessibility, housing density, and other urban-specific considerations. For example, the "Key Stakeholders" definition includes residents and organizations within one mile of a facility. In Boston, and other dense, urban environments, a one-mile radius might not prioritize the most impacted residents and organizations within a community. Taking City Hall as a discrete example, a one-mile radius includes ten different neighborhoods of Boston. The Draft Guidelines should better reflect the opportunities for local governments to direct project proponents on how to effectively engage with different communities.

The City of Boston greatly appreciates OEJE's leadership in developing the Draft Guidelines and recognizes the importance of CBAs and CBPs in advancing equitable and inclusive clean energy development. Thank you for your consideration of the City's comments on the guidelines. Should you have any questions about these comments, please do not hesitate to contact me at (617) 635-0031 or Oliver.SellersGarcia@boston.gov.

Sincerely,

Oliver Sellers-Garcia
Green New Deal Director, Office of Mayor Michelle Wu
Commissioner of the Environment Department, City of Boston