



For a thriving New England

CLF Massachusetts 62 Summer Street
Boston, MA 02110
P: 617.350.0990
F: 617.350.4030
www.clf.org

BY ELECTRONIC DELIVERY ONLY

March 13, 2024

Commissioner Elizabeth Mahony
Massachusetts Department of Energy Resources
100 Cambridge Street, STE 1020
Boston, MA 02114
doer.energy@mass.gov

Re: Comments on DOER's February 29th, 2024 Town Hall

Dear Commissioner Elizabeth Mahony:

Conservation Law Foundation ("CLF")¹ appreciates the opportunity to provide comments on the Massachusetts Department of Energy Resources' ("Department" or "DOER") call for comments regarding the Department's recent Town Hall held on February 29th, 2024 on Zoom and DOER's future engagement efforts with the public. The Town Hall utilized multiple best practices for community engagement, and we encourage the Department to continue to build upon this example in its further engagement with the public.

The Department's simultaneous interpretation of the Town Hall over Zoom in Spanish, Portuguese, Mandarin, Cantonese, Haitian Creole, and Vietnamese was accommodating for those communities across Massachusetts that speak these languages. It is further appreciated that the Town Hall slides, audio recordings, and Q&A will be provided in five out of six of these languages. CLF respectfully requests that the Department similarly translate these materials into Haitian Creole to ensure accessibility to them by Massachusetts Haitian Creole-speaking communities.

Continued public engagement with DOER efforts and work is crucial to ensure Massachusetts communities are informed and have a voice during this clean energy transition. Consultation with communities requires lead time and continuous, repetitive

¹ Founded in 1966, Conservation Law Foundation ("CLF") is a nonprofit, member-supported, regional environmental organization working to conserve natural resources, protect public health, and promote thriving communities for all in the New England region. CLF has advocated for Massachusetts families and communities for decades by forging solutions to environmental challenges caused by climate change. More information about CLF can be found at our website, www.clf.org.

communication. Specifically, DOER must ensure meaningful engagement with low-income, Black, Brown, Indigenous, and immigrant communities – who suffer the devastating effects of environmental and climate injustice at a much higher rate.²

Some recommendations for the Department’s future public engagement efforts should include:

Continued Community Outreach: CLF strongly encourages DOER’s continued outreach with Massachusetts community organizations, the public, and environmental justice communities throughout its future public engagement efforts. Notably, a broad selection of community partners should be included in these conversations to ensure diversity in perspectives and prioritization of community-specific concerns. Communities should also be consulted in advance about what information they want most to hear, and also what communications approaches are likely to be most well-received.

Accessibility to Information by All: Information must be easily accessible by all interested individuals and stakeholders. Educational and informational resources about the DOER’s programs or work efforts should be in plain language and ensure inclusive language access.

Use of Additional Resources to Address Knowledge Gaps: There must also be a shared understanding of the issues by assessing where there may be knowledge gaps. Organizations representing marginalized Massachusetts residents, including environmental justice populations, should be consulted on issues affecting the populations they serve. CLF strongly encourages DOER to review the US EPA’s October 2023 publication, “Capacity Building Through Effective Meaningful Engagement: A Tool for Local and State Governments”³ and the Office of the Attorney General’s Stakeholder Working Group May 2023 report, “Overly Impacted & Rarely Heard: Incorporating Community Voices into Massachusetts Energy Regulatory Processes”⁴ as resources for meaningful engagement and

² U.S. Environmental Protection Agency, *Learn About Environmental Justice*, available at <https://www.epa.gov/environmentaljustice/learn-about-environmental-justice>.

³ U.S. Environmental Protection Agency, *Capacity Building Through Effective Meaningful Engagement: A Tool for Local and State Governments* (October 2023), available at https://www.epa.gov/system/files/documents/2023-09/epa-capacity-building-through-effective-meaningful-engagement-booklet_0.pdf.

⁴ Massachusetts Attorney General’s Office, Stakeholder Working Group, *Overly Impacted & Rarely Heard: Incorporating Community Voices Into Massachusetts Energy Regulatory Processes* (May 2023), available at <https://www.mass.gov/overly-impacted-and-rarely-heard-incorporating-community-voices-into-massachusetts-energy-regulatory-processes>.

involvement of Massachusetts communities.

CLF appreciates DOER's efforts to engage the public on its work and looks forward to working with the Department as it helps move our Commonwealth toward an electrified future.

Sincerely,

A handwritten signature in black ink, appearing to read "Katherine Lee Goyette", written in a cursive style.

Katherine Lee Goyette
Staff Attorney
Conservation Law Foundation