MAPC
METROPOLITAN AREA PLANNING COUNCIL

SMART GROWTH AND REGIONAL COLLABORATION

April 1, 2021

Kathleen Theoharides, Secretary
Executive Office of Energy & Environmental Affairs
Attention: MEPA Office
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: Comment on the Draft MEPA Interim Protocol for Climate Adaptation and Resiliency

Dear Secretary Theoharides:

The Metropolitan Area Planning Council (MAPC) regularly reviews policy and project proposals deemed to have regional impacts. With a long-term interest in alleviating environmental impacts and promoting sustainable development, MAPC conducts reviews for consistency with MetroFuture, the regional policy plan for the Boston metropolitan area, and the Commonwealth's Sustainable Development Principles. Preparing for climate change, including mitigation and adaptation, is one of the key priorities established in MAPC's Strategic Plan.

The Council has reviewed the draft MEPA Interim Protocol for Climate Adaptation and Resiliency (Interim Protocol) and offers comments below. Overall, we are pleased to see the enhanced focus on climate resiliency in MEPA reviews. We commend EEA for proposing these important, forward looking amendments to the MEPA review process. Our comments focus on suggestions for how various aspects of the proposed protocol could be further strengthened. We hope you find these suggestions helpful as you finalize this proposal.

For Section I – Climate Risks Based on Project Location of the Interim Protocol, MAPC recommends including and/or modifying the following components:

- For Part A's question related to tree removal, the protocol should require projects to provide more specific information including the number of existing trees on site; the number of trees, and their caliper, to be removed as a result of the proposed project; as well as the number of trees to be replaced and/or added to site as part of the proposed project. Such details will provide a better understanding how a project addresses potential climate risks related to extreme heat.

- MAPC suggests including additional assessment criteria to understand more fully whether a project site is located in an existing/identified urban heat island/islet. Air and land surface temperature vary substantially across the urban-exurban gradient and even within urban areas, for example, from street to street depending on land surface characteristics and air movement. As such, some areas may experience increasing extreme heat earlier and most severely. A potential screening tool that can be used for land surface temperature assessment is the Trust for Public Land's "City Heat Island" dataset. TPL hosts a GIS 30-meter resolution layer depicting relative land surface temperature derived from Landsat 8 imagery, which covers every municipality in the United States. The layer is publicly available and updated yearly with new imagery.
  https://server4.tplgis.org/arcgis4/rest/services/National_UHI/city_heat_islands/ImageServer.

- For Part B, the proposed project should clearly identify the methodology and/or resources used to investigate the project site's flooding history.

- For Part C, if a project is located in a coastal community, the proponent should also clarify whether it is located in a Velocity Zone, as structures in this zone face additional hazards associated with storm waves.

- A follow-up question to Part D should ask whether a project is within the 200-feet boundary of DEP-mapped wetlands. Particularly in inland locations where FEMA flood maps often do not capture urban and suburban flooding, proximity to wetlands is a useful screening tool for assessing pluvial flood risk.

Under Part A of Section II – Evaluation of Project Criticality of the Interim Protocol, the current requirement to provide information about the criticality of a project is framed in such a way as it assumes the project is a benefit to the geographical area and populations in the vicinity of its site. MAPC recommends that the proposed project provide additional information regarding whether the construction and operations of a project may have negative environmental and social impact(s) to the immediate geographical area and populations near the project. Additionally, the levels of criticality (low, medium, high) should have clear definition, so that ranking of criticality will be consistent across projects.

For Section III – Climate Change Adaptation and Resiliency Strategies of the Interim Protocol, MAPC recommends that an initial assessment of potential impacts to Environmental Justice (EJ) populations be required under Part B. Furthermore, if a project is located in an EJ neighborhood, it is critical that the proponent should describe any potential environmental burdens or risks such a project type may cause, either directly or indirectly, and whether alternative location(s) have been considered for the project site. Currently, EEA's 2017 Environmental Justice Policy[1] requires enhanced analysis of impacts and mitigation when projects "exceed the mandatory Environmental Impact Report (EIR) thresholds for air, solid and hazardous waste, or wastewater and sewage treatment and disposal." MAPC believes such an assessment should be required as part of the Environmental Notification Form (ENF) submittal.

MAPC further suggests that MEPA take into consideration the potential differential climate impact of affordable housing projects compared to market rate housing. Residents of affordable housing projects typically have lower rates of automobile ownership and Vehicle Miles of Travel (VMT), while using non-auto transportation modes at a higher rate, thus generating GHG at a lower rate.

MAPC respectfully requests that the Secretary incorporate our comments into the MEPA Interim Protocol for Climate Adaptation and Resiliency. Thank you for the opportunity to comment on this draft Interim Protocol.

Sincerely,

Marc D. Draisen
Executive Director

1 EEA, 2017 Environmental Justice Policy. Source: https://www.mass.gov/files/documents/2017/11/29/2017-environmental-justice-policy_0.pdf.