



November 14, 2022

Massachusetts Environmental Policy Act Office
Director Tori Kim
100 Cambridge Street, 10th floor
Boston, MA 02114

RE: Comments on Proposed MEPA Regulations

Dear Director Kim,

Thank you for the opportunity to comment on the proposed regulations to the Massachusetts Environmental Policy Act (MEPA), (301 CMR 11.00). Buzzards Bay Coalition (BBC) is a membership-supported organization dedicated to improving the health of the Buzzards Bay ecosystem for all through education, research, advocacy, and conservation, including the restoration of natural resources.

We strongly support exempting Ecological Restoration projects from MEPA review. These projects are critical to improving the ecological health of our rivers, streams, wetlands. Exempting these environmentally beneficial projects will allow these nature-based solutions to occur at a quicker pace, restoring degraded habitats that benefit our waterways, as well as our communities.

Buzzards Bay Coalition is very active in planning and implementing projects that directly restore impaired wetland functions on the landscape. Restoring wetland function improves the ability of our watersheds and coastal ecosystems to provide important ecosystem services (including assimilating pollution, tempering storm floods, and providing fish and wildlife habitat) that are being strained by a rapidly changing climate. However, having experienced the permitting process first hand on several restoration projects, the MEPA process adds a significant amount of time and cost to our restoration efforts, which already inherently benefit the resource. Therefore, in these cases, the MEPA process does not result in additional benefit to the resource. The slow and expensive process inhibits important restoration work being completed. Therefore, we strongly urge the MEPA Office to exempt Ecological Restoration Projects from MEPA review to reduce permitting hurdles for these projects.

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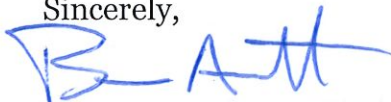
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Furthermore, BBC strongly supports expanding MEPA exemptions to include **“Ecological Restoration Projects” and Ecological Restoration Limited Projects**” as defined in 310 CMR 10.04. This includes the following types of restoration projects:

- Low impact or nature-based marsh restoration techniques (e.g., runnels, ditch filling with biodegradeable materials such as hay, etc.);
- Fish passage and channel restoration improvements (e.g., dam removals, nature-like fishways, culvert replacements, etc.), including associated public access improvements (e.g., overlooks, canoe launches); and
- Restoration of natural wetlands within formerly farmed cranberry bog complexes.

We thank you for the opportunity to provide you with these comments and recommendations.

Sincerely,



Brendan Annett
VP Watershed Protection
Buzzards Bay Coalition