



November 29, 2021

Executive Office of Energy and Environmental Affairs  
Attn: MEPA Office, Tori Kim, Director  
100 Cambridge Street, Suite 900  
Boston, MA 02114

**Re: Draft MEPA Protocol for Analysis of Project Impacts on Environmental Justice Populations**

Dear Director Kim,

On behalf of the Cape Cod Cranberry Growers' Association (CCCGA), we offer these comments regarding the draft MEPA Protocol for Analysis of Project Impacts on Environmental Justice Populations. Our concern lies with the mandatory Environmental Impact Report (EIR) that will be required for projects within one-mile of an Environmental Justice (EJ) population. Specifically, the issue is with bog restoration projects, those projects that are restoring active cranberry bogs to their natural wetland condition, retiring the bogs from agricultural activities in perpetuity. There is renewed interest in these types of projects, with demand currently outpacing dollars to restore these properties.

By mandating an EIR for EJ areas, the projects that are already underfunded will prove even more costly to undertake. Further, with the delays and unknowns of the EIR process, many growers will no longer opt for the restoration path and will act as a disincentive for considering entering into the restoration process. This decision could eliminate the potential for hundreds of acres of bog restoration projects. As currently situated, the majority of proposed bog restoration projects would require an EIR due to the EJ distinction.

The practice of restoring cranberry bogs to their natural condition is not one that is harmful to the environment. It is simply re-shaping a wetland that has been impacted by commercial agriculture for decades and returning it closer to its original natural condition, enhancing its wetland characteristics. These types of projects are not going to negatively impact EJ populations or the surrounding environment.

To force bog restoration projects into a mandatory EIR is going to have significant negative impacts to cranberry bog restoration efforts. Just as the state is poised to increase its capacity for restoration projects, this protocol will stop progress and likely result in numerous projects not being considered. We urge you to eliminate the requirement for a mandatory EIR within the EJ radius for bog restoration projects.

Sincerely,

Brian A. Wick, Executive Director

**About CCCGA:** CCCGA represents more than 300 cranberry growers in Southeastern Massachusetts, Cape Cod and Nantucket. Cranberries are the largest agricultural food commodity produced in the state with an annual crop value of \$64.9 million dollars. Massachusetts is home to 30% of all cranberry acreage and according to the most recent Farm Credit East Knowledge Exchange Report, provides more than 6,900 jobs and a total economic benefit of over \$1.4 billion to the Massachusetts economy.

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**Cape Cod Cranberry Growers' Association**

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