



Charles River Watershed Association

Tori Kim, Director
MEPA Office
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114
MEPA-regs@mass.gov

Re: Proposed Amendments to MEPA Regulations Regarding Environmental Justice

Dear Director Kim:

Charles River Watershed Association ("CRWA") submits the following brief comments on the proposed amendments to the MEPA regulations regarding environmental justice.

CRWA supports the additions to the regulatory language proposed by Conservation Law Foundation, Mass Audubon, GreenRoots, and Alternatives for Community & Environment that are intended to ensure that ecological restoration projects are implemented in environmental justice populations and contribute to the equitable distribution of energy and environmental benefits. CRWA agrees that in some cases, preparation of a full environmental impact report ("EIR") for ecological restoration projects located in proximity to environmental justice populations may be too burdensome in terms of time and cost, and that EEA should have discretion to determine, on a case-by-case basis, whether a full EIR should be required for such projects. The parameters proposed by Conservation Law Foundation et al. regarding when the requirement to prepare a full EIR may be met by a combined expanded environmental notification form ("EENF")/EIR are reasonable and should be adopted.

Thank you for considering these comments, and we look forward to participating in the remaining regulatory revision process.

Sincerely,

Heather Miller, Esq.
General Counsel & Policy Director