



Massachusetts Port Authority  
One Harborside Drive, Suite 200S  
East Boston, MA 02128-2909  
Telephone (617) 568-1000  
[www.massport.com](http://www.massport.com)

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March 31, 2021

Tori Kim, Director  
**Massachusetts Environmental Policy Act Office**  
100 Cambridge Street, Suite 900  
Boston, MA 02114

**Re: MEPA Regulatory Updates**

Dear Director Kim:

On behalf of the Massachusetts Port Authority (Massport), we are pleased to have the opportunity to provide initial comments on the Massachusetts Environmental Policy Act (MEPA) Office regulatory update process. We understand that the MEPA Office is in the process of revisiting its existing greenhouse gas (GHG), Environmental Justice, and Climate Adaptation Policies/Protocols as well as the MEPA regulations at 301 CMR 11.00. The regulatory review process will address various administrative updates including MEPA review thresholds, definitions, and review procedures and is intended to better align the above-mentioned policies, protocols, and regulations with current policy and planning efforts related to GHG emissions, environmental justice, and climate resiliency planning. Each of these policies are important to Massport's diverse portfolio of aviation, maritime, and real estate holdings.

Massport is supportive of MEPA's effort to harmonize its policies and regulations with current policy and planning efforts to ensure that environmental justice and climate resiliency considerations are more formally incorporated into the statewide environmental review process. We also agree that this is a good time to review the selected administrative and procedural elements suggested. As we have informally discussed, several of the current regulatory definitions such as "replacement project" and "routine maintenance" would benefit from clarification. Further, in support of Massport's efforts to protect the critical airspace around Boston Logan International Airport, L.G. Hanscom Field, and the Worcester Regional Airport, we appreciate your consideration of including Massport in the formal distribution requirement for projects near our three airports. We look forward to reviewing proposed updates and discussing the other key policies, thresholds, and definitions as they become available during the review process.

We understand that MEPA intends to hold public presentations, technical sessions, and public hearings to discuss and evaluate the proposed regulatory updates. Massport plans to participate in these sessions and will provide additional comments during the upcoming public comment period.

As always, we appreciate the ongoing spirit of collaboration with the MEPA office, and look forward to additional dialogue on these topics as you move forward with the regulatory update process. Please do not hesitate to contact me at 617-568-3524 or Brad Washburn at 617-913-9561 or [bwashburn@massport.com](mailto:bwashburn@massport.com) if you wish to discuss any of our comments.

Sincerely,

**Massachusetts Port Authority**



Stewart Dalzell

Deputy Director, Environmental Planning & Permitting

cc: J. Barrera, F. Leo, B. Washburn/Massport