



Secretary Rebecca Tepper
Executive Office of Energy and Environmental Affairs
100 Cambridge Street
Boston, MA

Re: Proposed Changes to MEPA Regulations

Dear Secretary Tepper,

On behalf of the Cambridge Redevelopment Authority (“CRA”) I am writing to express support for the proposed changes to the MEPA regulations to streamline the MEPA review process for new urban renewal plans (“URP”) and major amendments. Overall, the CRA appreciated the efforts to revise MEPA regulations to support housing development, especially infill redevelopment plans and projects near transit station.

The CRA especially supports the proposed changes to the MEPA regulations on new urban renewal plans or major modifications to URPs at 301 CMR 11.03(2)(b)7, removing urban renewal plans as a MEPA review threshold in the proposed regulations. It would provide for simply an Environment Notification Form (ENF) review where a filing would be for a URP or major plan amendment that does not include a specific development proposal. This allows the specific development projects under those plans to be reviewed based on their specific potential for environmental damage, which are often easier to measure later in plan implementation process.

A public redevelopment agency, such as the CRA, would facilitate comprehensive public review and feedback on a plan or plan amendment as outlined in the ENF. These regulatory modifications would streamline the MEPA review process for qualifying projects; reducing public costs and duplication of effort associated with neighborhood revitalization efforts and entitlement for infill housing projects undertaken under URPs.

Reducing the time and costs associated with MEPA review may encourage redevelopment authorities to advance comprehensive redevelopment plans to deliver new housing units. The CRA is strongly committed to expanding housing opportunities in the City of Cambridge and a new strategic plan has been implemented in which expanding affordable homeownership options has become a key focus for the CRA’s mission over the next several years. New redevelopment plan areas might assist in meeting this objective.

The only modification to the Special Review Procedures (“SPC”) I would suggest is for the SPC to allow the Secretary to be authorized to determine that only an ENF filing is required for a housing-focused redevelopment plan that functions as a planning document and “meets or substantially meets” the criteria set forth in the proposed regulations (301 CMR 11.01(2)(c)1.a.-g)

identifying projects that will not cause Damage to the Environment. Such a refinement to the proposed regulations could reduce uncertainty in planning for future housing development and materially expand the utility of the streamlined regulation for redevelopment plans.

Thank you for this opportunity to provide you with these comments and support for the proposed changes to the MEPA regulations. We look forward to working with you on their successful implementation.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Thomas L. Evans', with a stylized, cursive script.

Thomas L. Evans
Executive Director