



# Massachusetts Association of Regional Planning Agencies

November 10, 2025

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

**RE: Comments on proposed changes to MEPA Regulations at 301 CMR 11.00 et. seq.**

Dear Director Kim,


The Massachusetts Association of Regional Planning Agencies (MARPA) writes to express our support for the proposed MEPA Regulations amendments at 301 CMR 11.00. MARPA represents the 13 regional planning agencies (RPAs) that serve 351 communities across the Commonwealth. MARPA supports the Healey-Driscoll Administration's commitment to boost the Commonwealth's housing production while ensuring minimization of environmental impacts.

MARPA strongly encourages the MEPA Office to consider utilizing the Expanded Environmental Notification Form (EENF) requirements for qualifying housing project proposals. An EENF would include an alternatives analysis along with a more detailed environmental impact assessment (e.g., water and wastewater capacity, trip generation, etc.) available for public review and input. Additionally, a requirement that qualifying housing project proposals include preliminary identification of mitigation measures would be in alignment with Section 61 Findings in the current MEPA review process. Doing so would be of critical importance to provide guidance to the subsequent state permitting agencies and transparency about the mitigation measures the proposed development project is expected to conduct.

MARPA also requests that the MEPA Office provide additional guidance for more comprehensive and equitable engagement throughout the MEPA review process, especially for proposed projects in Environmental Justice communities. MARPA suggests that the MEPA Office work closely with its established Advisory Council – which is made up of municipal and community representatives – to develop clear criteria and guidance for how to conduct engagement as part of the MEPA permitting process. Existing resources, including the Municipal Vulnerability Preparedness (MVP) Planning 2.0 program, have already developed materials to support these outcomes. This will also ensure alignment and consistency with state's expectation and outcomes for community engagement.

Thank you for your consideration of MARPA's recommendations. If you have any questions, please do not hesitate to contact us at [ldunlavy@frcog.org](mailto:ldunlavy@frcog.org) and [jwalker@srpedd.org](mailto:jwalker@srpedd.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Linda Dunlavy". The signature is fluid and cursive, with the first name "Linda" and last name "Dunlavy" clearly distinguishable.

Linda Dunlavy  
Co-President, MARPA  
Executive Director, Franklin Regional  
Council of Governments