



November 10, 2025

Tori Kim  
Director, MEPA Office  
100 Cambridge Street, Suite 900  
Boston, MA 02114  
Via Email: [MEPA-regs@mass.gov](mailto:MEPA-regs@mass.gov)

**Re: Proposed MEPA Special Review Procedure for Urban Renewal Plans**

Dear Director Kim,

MassINC's Gateway Cities Innovation Institute, on behalf of our Gateway Cities MEPA working group and our network of municipal and economic development leaders, is pleased to submit written testimony on the proposed Special Review Procedure for Urban Renewal Plans. Our understanding is that the purpose of the SRP is to streamline the review of URPs and major modifications, primarily by removing the EIR requirement.

Our network has also submitted written testimony in strong support of the proposed MEPA regulatory changes in 301 CMR 11:00, and we refer you to that letter, signed by many local officials and redevelopment leaders. Those rule changes will: save funds that are now invested in engineering fees; support housing, mixed-use and ecological restoration projects; and conserve MEPA office and municipal staff time for more essential work.

We appreciate the effort you and your team at MEPA have invested in developing the Special Review Procedure, and we believe it provides a valuable approach to MEPA review of URPs in instances not covered by the regulatory changes. **We urge the adoption of both the MEPA regulatory changes in 301 CMR 11:00 and adoption of the optional SRP for Urban Renewal Plans for the following reasons:**

1. It could help those communities that have already initiated new or major modifications to their urban renewal plans and for whom the proposed regulatory reforms will not apply;
2. It could provide greater flexibility for those URPs in which the municipality would like to propose specific redevelopment in conjunction with their conceptual plans;
3. The SRP could serve as a clear set of MEPA guidelines for urban redevelopment authorities in terms of how they should approach their URPs.

However, while supporting the adoption of the SRP, we recommend simplifying the procedure, or clarifying MEPA's intent to simplify the procedure, because we believe that some of the language could be interpreted by future regulators to re-open the door to cumbersome requirements and costly mandates.

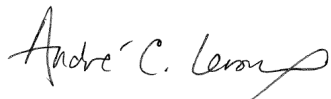
1. **Enable optional use of the SRP** – Since we believe that the SRP would be a valuable complementary tool to the 301 CMR 11.00 regulatory reforms, we suggest inserting explicit text that municipalities may opt in to the SRP process.
2. **Provide clear guidelines about drafting URPs** – The SRP should clarify as much as possible what constitutes a conceptual URP versus a URP that includes physical projects that might be subject to a higher level of MEPA review. This would help municipalities properly draft their URPs and separate plans from projects. If the proposed regulatory reforms get adopted, these guidelines will help municipalities understand when their URPs are exempted and when they should file through the SRP. As we have expressed to the MEPA office and EEA leadership over the last two years, urban renewal plans, while intended to address blight and facilitate redevelopment over time, do not directly result in development. Speculative attempts to evaluate future redevelopment cost time and money and are not helpful. Projects that exceed MEPA thresholds are already subject to MEPA review when they are proposed. However, URPs regularly identify local zoning and rule changes that could facilitate redevelopment and additionally prioritize specific blighted parcels. The SRP should state clearly that neither of these categories of actions identified by urban renewal plans will trigger a higher level of review.
3. **Clarify that project proponents are responsible for their analysis** – As drafted, the proposed language could imply that the municipality is responsible for providing the documentation for and analysis of specific redevelopment projects. Subjecting the URP to this kind of analysis places the cost and time burden on the municipality rather than the developer. In cases where an urban renewal plan includes physical projects, we believe that the expense of MEPA filings and analysis should be borne by project proponents, not the public via local governments or state agencies which might need to step in with additional grant and TA funds.
4. **Exempt public infrastructure investments from URP review** – The reason for inclusion of public infrastructure projects in the ENF is unclear. They demonstrate municipal commitment to the area, but these projects are typically not part of the URP. Tracking the impacts of these is outside the purview of a redevelopment agency, and if a public infrastructure project is undertaken and meets MEPA thresholds, it will then receive an enhanced MEPA review. Public infrastructure improvements that could help to achieve goals of a URP are unlikely to have disproportionate negative environmental impacts on EJ populations; rather these plans and their investments are geared to support and bring economic opportunities to the neighborhoods that need them. If the MEPA office intends something much simpler, such as listing recent and planned public infrastructure improvements in the urban renewal area, then the SRP language should reflect that and not imply that a more costly analysis may be required.
5. **Specify data collection about development impacts** – In a similar vein, we are unclear about the data collection requirements regarding the impacts of development in the URP area as discussed on pages 2 and 3. Is this impact data to be collected only on blighted properties mentioned in the URP, or is it on what is likely to be for a much larger number of parcels in the Urban Renewal Area but not part of the plan? If it refers to tracking only those

properties mentioned in the URP, the cumulative impact of development will likely be underestimated, while collecting data and estimating impact on all parcels would be a daunting task. In either case, we think this data collection adds another responsibility for the municipal agency that should remain with development proponents. We believe that the ambiguous language about data collection, particularly in regards to cumulative impacts, could create a serious unfunded mandate on municipalities requiring significant staff time and new tracking systems. Again, if this is not what MEPA intends, we request clarification of the text to more specifically reflect what will need to be demonstrated, such as a listing of all recent development projects in the urban renewal area, with clarity around timeframe (i.e. last five years) and types of projects (i.e. private/public). “Demonstrating” or even “estimating” impact is troublesome generic language since future regulators could interpret it in almost boundless ways.

While the proposed regulatory changes to 301 CMR 11.00 would provide widespread benefits to Gateway Cities and other municipalities if adopted, some municipalities may not benefit since they have already begun their URP process or for other particular reasons. In these cases, the SRP would offer a helpful pathway for a sensible review, as long as the SRP text delineates what constitutes conceptual planning and what constitutes physical development projects. We strongly encourage MEPA to steer away from speculative impact analyses of conceptual plans and burdensome data collection requirements.

Gateway Cities are home to many of the state’s EJ communities, and we whole-heartedly support their prosperity and seek to work collaboratively to clean up decades of environmental pollution. We appreciate the efforts of MEPA and EEA to simplify its environmental review process for urban renewal plans, and we thank you for the opportunity to provide feedback and suggestions on the proposed SRP language.

Thank you for your consideration. Please do not hesitate to contact me at [aleroux@massinc.org](mailto:aleroux@massinc.org) or 617-251-3861, or any of my colleagues in our Gateway Cities MEPA working group listed below.



André Leroux  
MassINC Gateway Cities Innovation Institute

*On behalf of the Gateway Cities MEPA working group:*

Joshua D. Amaral  
Director, Office of Housing and Community Development, City of New Bedford  
Executive Director, New Bedford Redevelopment Authority

Ken Fiola  
Executive Vice President  
Bristol County EDC

Liz Murphy  
Executive Director Community Development & Planning Department  
City of Fitchburg

Sarah Page  
Executive Director  
Fall River Redevelopment Authority

Jay Pateakos  
Executive Director  
Office of Economic and Community Development  
City of Taunton

Tom Skwierawski  
Chief of Planning and Community Development  
City of Revere

Aaron Vega  
Director, Office of Planning and Economic Development  
City of Holyoke