

10/10/25 public comment submitted through MEPA public comment portal

Our concern is with the proposed removal of Urban Renewal Plans from the MEPA public notification system that would deny the public the opportunity to be aware of major project proposals, and therefor their chance to track the proposals' future design and authorization progress, and thus eliminate meaningful public commentary.

Changing the MEPA requirements from and EIR to an ENF so that a full report doesn't need to be created, but that the Urban Renewal Project proposals still are part of the MEPA public notification system would reduce the burden for entities considering filings (the intention behind the proposed change) while still preserving the public notification process and the opportunity for a meaningful response (by continuing to preserve the public notification process).

Urban Renewal Proposals have a deeply mixed history, both nationally and in the Commonwealth, with well documented adverse community impacts, and this requires a public process with public notification and engagement opportunities to safeguard any future work against past errors.

Our concern is based on long experience with state highway plans where a 30% design is too early for public comment and the next stage for input is a 70% design where it is too late for substantial modification, thereby eliminating meaningful public input into a project. The fear with this proposed MEPA change is that if you eliminate **ALL** MEPA notification at the outset you will create a "too early for public comment" period and effectively only leave a "too late for substantial modification" period, thereby eliminating all meaningful public input.

We acknowledge the State's desire to reduce the burden on filing a broad Urban Renewal Plan, but we wish to preserve the current public notification process through the MEPA Environmental Monitor. We believe that both ends can be achieved by eliminating the requirement for a full impact report while still posting the proposals as a notification in the MEPA regular bulletin.

To eliminate all notifications for Urban Renewal Plans until they are at the point of formal construction proposals is to create an environment where we revisit past planning process excesses and open the door to public disenfranchisement.

Thank you very much for your attention to this matter.

Sincerely,
Colin M.J. Novick
Executive Director
Greater Worcester Land Trust