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THOMAS P. KOCH
Mayor

JAMES J. FATSEAS
Planning Director

October 29, 2025

Tori Kim, Director
MEPA Office
100 Cambridge Street, Suite 900
Boston, MA 02114

Re: Proposed MEPA Special Review Procedure for Urban Renewal Plans

Dear Director Kim:

Thank you for the opportunity to comment on the draft Special Review Procedure (SRP) for Urban Renewal Plans (URP) issued by the MEPA Office on September 10, 2025. The City of Quincy understands how vital URPs are in facilitating the strategic acquisitions, parcel assemblages and dispositions, and public realm improvements that are fundamental to revitalizing many of the Commonwealth's neighborhood centers and business districts. URPs enable us to attract new and expand existing businesses; encourage mixed-use residential development; improve circulation for pedestrians, vehicles, and public transit; enhance visitors' experiences; and strengthen the quality of life for residents. Quincy adopted its first Urban Renewal Plan for the Quincy Center District on May 7, 2007, and is in the process of establishing the Wollaston Center Urban Renewal District.

As the MEPA office recognizes, expanded review requirements – including the requirement to file an Environmental Impact Report (EIR) for URPs that only trigger the threshold for an Environmental Notification Form (ENF) due to their proximity to Environmental Justice Populations – have increased the complexity of and timeline for the review of URPs. The purpose of the SRP is to streamline the review of new URPs and associated major modifications, primarily by removing the EIR requirement.

The City of Quincy would like to offer the following comments and questions:

- We note that the MEPA Office has simultaneously released draft amendments to 301 CMR 11.00 that would remove the EIR requirement for URPs. We understand that those amendments may be adopted in lieu of this SRP. We believe that the regulatory amendment is more straightforward and is therefore a preferable approach.

- P.4, first paragraph: "Any urban renewal agency **wishing to proceed under this SRP** shall sign an acknowledgement agreeing to comply with the procedures set forth herein." However, p. 6, 2nd paragraph under "Term of SRP and Modification" states: This SRP **shall apply** to new URPs or major modifications to be submitted for approval by EOHLC or EOED after the effective date of the SRP. Would URPs be required to use the SRP, or is it optional?
- P.4, bullet 3: "A description of proposed land uses and development strategy for the URA shall be provided consistent with EOHLC/EOED requirements, together with any available information on potential impacts such as estimates of total land alteration, traffic, water/wastewater usage, etc." We believe that the impacts associated with a URP are limited to those resulting from the actions that qualify as Urban Renewal Projects (a.k.a. Urban Revitalization and Development Project) regulated under 760 CMR 12.00, which typically include land acquisition/disposition and public realm improvements. Any changes to land use or zoning designations would not result in impacts subject to MEPA review, unless and until a project is proposed that would exceed a MEPA threshold (much like in any other municipal land use plan or zoning map amendment).
- P.5, bullet 2: If the proposed amendments to 301 CMR 11.00 are promulgated in lieu of the SRP, would it still be possible to link subsequent MEPA filings for projects within the URP district administratively to the EEA number corresponding to the URP filing, or is that only available under the SRP?
- P.5, bullet 4: "For each ENF filing for an individual project, the urban renewal agency shall coordinate with the project proponent, to the extent feasible, to provide an updated accounting of redevelopment completed by the urban renewal agency's disposition of parcels identified in the urban renewal plan, together with other redevelopment, if known, and estimated cumulative impacts of **all redevelopment to date**, as of the time of the ENF filing." Does "**all redevelopment to date**" include projects not subject to MEPA?
- Term of SRP and Modification: If the proposed regulatory change were to be adopted instead of the SRP, would proponents still be allowed to file an NPC with a request to rescind a Scope previously issued (after consultation with the MEPA Office)?

Again, thank you for seeking public input on this important proposal. We look forward to continuing to work with the MEPA office as this process unfolds.

Sincerely,



James J. Fatseas
Planning Director

CC: Mayor's Office