



Kimberly H. Robinson, MUP
Executive Director

July 26, 2021

Ms. Kathleen A. Theoharides, Secretary
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, Massachusetts 02114

Attention: MEPA Unit

Reference: PVPC Comments on the Draft MEPA Public Involvement Protocol for
Environmental Justice Populations

Dear Secretary Theoharides:

The Pioneer Valley Planning Commission (PVPC) has the following review comments on the Draft MEPA Public Involvement Protocol for Environmental Justice Populations as currently posted on the MEPA website. In general, we are very supportive of the draft language and feel it strengthens the outreach process and expands opportunities for public engagement through the MEPA process.

The draft document contains language on page 3 indicating that “any project that will require an unusually large volume of project-or construction-related diesel trucks or equipment may be regarded as affecting air quality up to a 5-mile radius.” Additional clarity on the number or percentage of trucks that would trigger this requirement would be helpful. Relative to air quality, it may also be beneficial for MEPA to consider adding a consideration involving the extent of impervious area since such surfaces increase ambient air temperatures and create conditions for increased ground level ozone, especially during the heat of summer months.

On the publishing of Letters of Intent (LOI) submitted to MEPA on page 4, current proposed language indicates that the LOI may be made available in either the Environmental Monitor or on a dedicated section of the MEPA website. We’d recommend this occur in the Environmental Monitor to conveniently summarize all documents submitted to MEPA in one location.

Also on page 4, where it indicates that the project summary should be written in succinct non-technical format, consider including a specific reference for guidance. One source could be: *Federal Plain Language Guidelines*, available at: www.plainlanguage.gov/guidelines/. Such a standard could serve in all aspects of how proponents communicate about their project to stakeholders.

We would request that the corresponding regional planning agency be added to the list of invitees for any required project information meetings. This would be helpful to ensure that sufficient notice is provided in advance of the meeting.

It is agreed that language interpretation services should be provided upon request for public meetings, however, it is not always possible to arrange such services in as little as 48 hours in advance of a meeting. It is suggested that additional options be considered to allow the project proponent to provide interpretation services such as a private meeting when an interpreter is not available.

Thank you for the opportunity to offer our comments on this draft version of the Public Involvement Protocol for Environmental Justice Populations.

Sincerely,

A handwritten signature in cursive script, appearing to read "Kimberly H. Robinson".

Kimberly H. Robinson, MUP
Executive Director