

**From:** [Sarah Freeman](#)  
**To:** [MEPA-regs \(EEA\)](#)  
**Subject:** Comments re: MEPA updating regulations - 301 CMR 11.00 and associated policies and guidance  
**Date:** Tuesday, September 17, 2024 1:06:01 AM

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Dear "MEPA-regs",

Thank you for seeking public feedback regarding updating regulations: 301 CMR 11.00 and associated policies and guidance.

I'd like to add my voice to those asking for MEPA regulations to acknowledge that logging has impacts on climate change & greenhouse gas emissions. These impacts should be disclosed and considered in any decisions made regarding state-owned land.

It is apparently possible for projects to be exempt from MEPA review - even large projects with significant negative impacts - by following an "approved cutting plan or other similar generally accepted forestry practices". This is not in the best interests of environmental health.

Please update the MEPA regulations to require that the development of forest management plans, timber sale plans, forest stewardship plans, or other efforts to manage timber resources occurring on state-owned lands under the control of DCR be:

- developed in compliance with [Section 2f of Chapter 21](#),
- published in the Environmental Monitor
- submitted to the Stewardship Council for approval as provided by said section.

Comprehensive forest resource planning efforts:

- must consider the cumulative impacts of similar projects on state-owned lands occurring over a 10-year planning horizon
- shall be subject to full disclosure of climate impacts as specified in [Section 61 of Chapter 30](#).
- Cumulative impact analyses shall also consider similar management activities being conducted on private lands which may be adjacent to those state-owned lands where planning for active management is being considered.

Within one year of passage:

- the Commissioner shall enact regulations specific to the agency's vegetation management efforts occurring in public forests, parks, and watershed protection areas, consistent with the above, and in accordance with [Chapter 30A](#).
- Such regulations shall include a provision for citizen appeal of final decisions and shall specify the process for disposition of such appeals.

Thank you again for considering these revisions to the MEPA regulations.

Sincerely,

Sarah Freeman, 22 Arborway, Jamaica Plain, MA 02130

**From:** [Sarah Freeman](#)  
**To:** [MEPA-regs \(EEA\)](#)  
**Subject:** Please add biohazards related to opioids to the thresholds  
**Date:** Monday, September 16, 2024 9:22:24 PM

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Dear "MEPA-regs",

I just learned that you are reviewing the MEPA regulations. I'm concerned that there are no thresholds (that I'm aware of) for biohazards related to opioids, such as discarded used needles and contaminated human waste.

An example:

A review of the needle pick-up pages on the website below provides a sense of what was happening at the Shattuck Hospital site during the presence of the temporary cottages & reuse of the Pine St. Inn shelter to house 50+ residents in low threshold/no barrier housing:

<http://bostonheatmap.com/>

An RFP for permanent supportive housing & related services on the site was controversial. There was only one response to the RFP, and the proposal was for a development many times larger than the RFP envisioned. Nevertheless, the lone proposal was provisionally designated. Public meetings drew much opposition from the environmental justice neighborhoods around Franklin Park, from providers of recovery services and from people in need of services. (Wrong site, wrong location, wrong size etc.)

These services are important, but they should not be concentrated in one location due to the environmental (and other) negative impacts. A statewide de-centralized plan is needed for this statewide challenge.

<https://www.mass.gov/info-details/shattuck-campus-redevelopment-at-morton-street-proposal>

Thank you for considering this revision,  
Sarah Freeman  
22 Arborway, Jamaica Plain, MA