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15 State Street Suite 1100  
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[bostonharbornow.org](http://bostonharbornow.org)

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November 14th, 2022

Via email: [MEPA-regs@mass.gov](mailto:MEPA-regs@mass.gov)

MEPA Office  
100 Cambridge Street  
10th Floor  
Boston, MA 02114

Attn: Tori Kim

Re: Proposed MEPA Regulatory Updates

Dear Ms. Kim,

Boston Harbor Now respectfully submits the following comments on the Proposed Amendments for 301 CMR 11.00 and associated policies and guidance put forward by the Massachusetts Environmental Protection Agency (MEPA). Staff from Boston Harbor Now have been engaged in the regulatory update process and attended the most recent October 27th, 2022 public meeting. We are supportive of the clarifications beginning to streamline the permitting process for projects that are making a positive environmental impact.

As longtime stewards of the Boston Harborwalk, Boston Harbor Now is committed to ensuring that the waterfront we build today is designed for a more resilient and inclusive future. We use the term “Harborwalk 2.0” to capture the framework and aspirations of this work. In order to protect public rights and expand the adaptive capacity of our coastal areas, we regularly monitor and review waterfront projects subject to MEPA oversight to ensure that they address our core principles of resilience, equity, and access in conjunction with other regulatory processes Chapter 91 and Boston’s Article 80.

With the current pace of development in the region, we support the more curated focus on projects likely to impact vulnerable communities, potentially damaging to the local environment, and running counter to climate goals like reducing greenhouse gas emissions. We believe that the proposed amendments follow their initial mandate of protecting environmental justice communities since projects that exceed the dimensional maximums or do not pass the Secretary’s review will still be required to complete an ENF and EIR. Further, projects that provide environmental benefits, like the creation of safer complete streets or ecological restoration projects, will be encouraged by the reduction of regulatory hurdles. The proposed amendments will expedite the permitting process for environmentally beneficial projects which will not only allow them to be built in communities faster, but also promote their development.



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We recognize that these initial rule changes are only the beginning of a more extensive process to adjust state regulations to ensure that these processes are evaluating the most critical concerns of the present day and future challenges. We appreciate the opportunity to comment on this process and look forward to remaining engaged in further processes to review and revise MEPA's regulations.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathy Abbott", with a long, sweeping flourish extending to the right.

Katherine F. Abbott  
President and CEO  
Boston Harbor Now