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January 22, 2018

Secretary Matthew Beaton  
Executive Office of Energy and Environmental Affairs  
Attn: Paige Czepiga, MEPA Office  
100 Cambridge Street, Suite 900  
Boston, MA 02114

via email to [Page.Czepiga@state.ma.us](mailto:Page.Czepiga@state.ma.us)

Re: Suffolk Downs Redevelopment, EENF

Dear Secretary Beaton,

On behalf of Boston Harbor Now, thank you for the opportunity to comment on the Expanded Environmental Notification Form (EENF) for the Suffolk Downs Redevelopment project submitted by McClellan Highway Development Company LLC (McClellan) in November of 2017.

After reviewing the EENF and attending the January 8, 2018, MEPA site visit, our comments follow.

#### Project description

As presented in the EENF, this proposal is for the redevelopment of the existing Suffolk Downs horse racing facility located in East Boston and Revere. The site is approximately 161 acres extending over two municipalities--109 acres in Boston and 52 acres in Revere.

As proposed, the Suffolk Downs Redevelopment Master Plan Project will include 16.5 million SF of mixed-used development; approximately 11 million square feet will be in the City of Boston and 5.5 million square feet in Revere. The entire redevelopment will take 15 to 20 years to complete.

#### Phase 1 Waiver

MEPA reviews require State agencies to evaluate the environmental consequences of permitting a development project and to require all feasible measures to be taken to avoid, minimize, and mitigate potential damage to the environment. Under 301 CMR 11.11, the Secretary may waive any provision or requirement of the MEPA regulations and may impose appropriate and relevant conditions or restrictions, provided that he finds that strict compliance with the rule or requirement would not avoid or minimize

damage to the environment. The proponent has requested a Phase 1 waiver for a limited portion of the site, located in East Boston. Phase 1 would include:

- 520,000SF of office space,
- A new internal access road,
- Open space improvements, and
- 520 structured parking spaces.

We understand the proponent's need to expedite the process in response to Amazon's search for new headquarters and the site's inclusion in, the recently published, shortlist of potential sites. Assuming that the waiver has the support of the City of Boston and the Impact Advisory Group for this project, Boston Harbor Now does not oppose McClellan's request for a Phase 1 waiver. Our concern, expressed in the following comments, focus on the remaining sections of the Master Plan.

The Suffolk Downs Redevelopment is a significant proposal with some fluid and yet-to-be-designed portions. The project will require extensive collaboration between City and State agencies, effective communication between two different municipalities, and a lengthy construction period. A Draft Environmental Impact Report (DEIR) for the remaining acres of the redevelopment is an absolute necessity for a project of this magnitude. We look forward to reviewing the proponent's DEIR at a future time.

A portion of Phase 1 is located within landlocked tidelands that are exempt from Chapter 91 licensing obligations. The Secretary may, however, require a public benefits determination for the proposed Phase 1 section of the project. As proponents develop the DEIR, we ask that particular attention is given to project impacts on abutters and surrounding communities, the proposed on-site community activities, and the public benefits offered as part of the redevelopment.

#### Environmental Protection and Preservation

According to the EENF, the Suffolk Downs site contains 8 acres of wetland area. The Rumney Marshes Area of Critical Environmental Concern (ACEC) is part of the 8-acre wetland area and runs through a portion of the Suffolk Downs redevelopment site.

ACECs are areas that receive special recognition because of the significance of the natural and cultural resources they provide. Rumney Marsh was designated by the state as an ACEC in 1988 to preserve its environmental value as one of the most biologically significant salt marshes within and north of Boston. We commend the proponent for recognizing the importance of the area both in the EENF and at public meetings.

One of our predecessor organizations (The Boston Harbor Association) worked closely with the Saugus River Watershed Council to educate the community and advance the long-term objectives of the Rumney Marsh ACEC designation<sup>1</sup>. Section 4.4.6 of the EENF points to the Marsh as a "heavily disturbed" area due to previous onsite activities. We understand the history of activities on the site may have heavily disturbed the natural habitat. These salt marshes are still vitally important to the surrounding areas, partially due to their capacity to provide flood water storage and prevent flood damage. Boston Harbor Now is particularly interested in understanding the proponent's mitigation plans to address the existing disturbances and restore portions of this environmentally valuable natural resource. We look forward to reviewing additional details in the DEIR.

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<sup>1</sup> <http://www.mass.gov/eea/docs/dcr/stewardship/acec/rumneymarsh.pdf>

Finally, according to the supplemental information provided to MEPA, the Phase 1 project will add an estimated 19,000 cubic yard volume of fill within Land Subject to Coastal Storm Flowage (LSCSF). Although the proponent confirms there are no plans to alter existing wetland areas, the grading plan indicates the use of fill to increase site grade near the infield pond and at the edge of existing wetland areas. The DEIR should focus on impacts to the wetland areas resulting from fill on abutting resource areas and the effects associated with redirecting storm flooding.

#### Public Access and Transportation

Recognizing that this project is being expedited due to its role in Boston's bid for the second Amazon headquarters, we anticipated a plan that more closely aligned with the Boston proposal. The City's proposal included a water transportation component that is not mentioned in the EENF. For future ferry service to be a viable option for the site, there must be meaningful connectivity to and across Route 1 at the southwest corner of the site included in the plan. The DEIR should include a passenger ferry viability study that considers travel times and travel time savings from Downtown Boston and North Station, a feasible location and design for a ferry dock proximate to the site, and vessel designs that can be used with the Andrew McCardle and Chelsea Street bridges.

Currently, the Phase 1 section of the project is proximate to the Suffolk Downs T station but it is not near an existing bike path/network. The nearest bike and pedestrian pathway is the East Boston Greenway that currently terminates near the Orient Heights T station. We are excited to hear that the proponent plans to connect the East Boston Greenway to Revere Beach. We strongly support efforts to incorporate several modes of transportation to and from the redevelopment site. Extending the existing East Boston Greenway will provide both the site and the surrounding communities with improved access and recreational benefits.

As presented in the EENF, there will be several new east-west pedestrian pathways that cut across the site to connect Revere and Orient Heights. We applaud efforts to improve walkability across the site and encourage the proponent to explore additional north-south connections across the site as part of the DEIR. We look forward to reviewing details of improved pedestrian and bike pathway connections in the DEIR.

A detailed mitigation commitment timeline that addresses the proponent's transportation contributions should also be included in the DEIR.

#### Climate Change

We were glad to read that the proponent understands the vulnerability of the Suffolk Downs redevelopment site to flooding. We see this project proposal as an excellent opportunity to build an exemplary climate resilient project that creates on-site as well as district-wide resiliency that will also benefit the surrounding communities. We strongly urge the project proponent to consider district-wide resiliency approaches as part of the DEIR.

As completed by the proponent, the Boston Climate Change Resiliency and Preparedness Checklist confirms that the project site is within the FEMA 100-year Flood Zone AE with a Boston City base site elevation ranging from 14-22 (the lowest point on the property is currently 14 inches at the Beachmont station in the Revere section of the project). As presented in the EENF and at public hearings, the proponent plans to elevate portions of the site to the Boston Planning and Development Agency-recommended standard of 40-inches above the 100-year FEMA flood elevation and to create an opportunity for the community to shelter in place. We applaud this initiative.

The proponent's responses to the Resiliency Checklist also indicated that the frequency of storms, the need for temporary flood barriers, the resiliency of critical building systems, flood proof elevations, and first floor elevations are yet-to-be-determined or have not been analyzed. Site and building design should consider the possibility that today's 1% storm could have a frequency of 10% by mid-century, and that chronic flooding associated with monthly and seasonal high tides will become more and more prevalent during the latter half of the century. We strongly recommend the proponents evaluate the combined impacts of both nuisance flooding and storm scenarios as well as increased intensity of super storms, nor'easters, and hurricane events that was suggested by the Climate Ready Boston/Boston Research Advisory Group report.

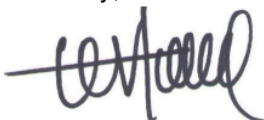
We also note that the Boston Research Advisory Group's projections for the Climate Ready Boston project indicated that that sea level rise may completely submerge the Bell Isle Marsh over time, substantially reducing the buffering capacity of this natural resource. The resilience plan for the Suffolk Downs site should consider this possibility.

During the MEPA site visit, our staff inquired about coastal flooding during winter storm Grayson. The development team confirmed that the tide gates along Bennington Street were vital in preventing storm surge and coastal flood waters from entering the Belle Isle Square section of the property. We note that the tide gates affecting the redevelopment project are operated and managed by the Department of Conservation and Recreation (DCR). Climate change resiliency plans explored as part of the DEIR should consider a program that supports DCR's tide gate operations.

Finally, it is clear there will be a significant gap of time between the completion of Phase 1 and full buildout of the Suffolk Downs redevelopment. It is essential that Phase 1 is well-designed, with the public amenities, resilient design standards, and multimodal connections that will make it a great place and destination on its own.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Jill Valdes Horwood". The signature is fluid and cursive, with a prominent horizontal stroke across the middle.

Jill Valdes Horwood  
Director of Policy