



Are you on board?

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via email to Page.Czepiga@state.ma.us

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

Re: Suffolk Downs Redevelopment, DEIR

Dear Secretary Beaton,

On behalf of Boston Harbor Now, thank you for the opportunity to comment on the Draft Environmental Impact Report (Draft EIR) for the Suffolk Downs Redevelopment project submitted by The McClellan Highway Development Company LLC (MHDC).

Imagine Boston 2030 identifies Suffolk Downs as one the City's most promising growth areas. Suffolk Downs is to East Boston what the Seaport was to South Boston -- an important and timely opportunity to create significant employment opportunities, increased economic activity, and tax revenue. Similar to the Seaport District, Suffolk Downs is low-lying and will face increasing exposure to flood risks over time. Ensuring that the new development is fully resilient is essential. It is for the benefit of the City, the State, neighbors, and advocates that we get the planning and design of this area right.

We commend the proponent for its robust public engagement activities and for presenting to Boston Harbor Now and its stakeholders on two separate occasions.

Project description

As presented in the Draft EIR, 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.

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. Overall the project will add 8,000,000 SF of office space, 7,150,000 SF of residential space, 500,000 SF of retail space, and 550,000 SF of hotel space. As proposed, of the 7,150,000 SF, 4,300 housing units will be in the Boston portion of the project along with 8,000 structured garage parking spaces.

The entire redevelopment will be constructed in 5 phases over a 15-to-20-year period. As currently proposed, the site plans reflect a commitment to resiliency and a willingness to continue to improve climate change strategies throughout the entire project timeline.

Phase 1 Waiver

We understood the proponent's initial need to expedite the process in response to Amazon's search for new headquarters. A Phase 1 waiver was requested and granted to expedite the construction of the Belle Isle Square portion of the site.

The Suffolk Downs Redevelopment is a significant proposal that continues to have 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.

Seeing as Amazon HQ2 is no longer a possibility, we recommend re-visiting the need to isolate this particular section of development from the Master Plan.

Urban Design

We continue to support the project's commitment to create 40-acres of publicly accessible open space on site. The Suffolk Downs Redevelopment project is an opportunity to bring open space and amenities to a community that is currently deficient in parks, playgrounds, and recreational spaces. The two plazas, performance park, and civic plaza are all welcome additions.

Open space is a resource both East Boston and Revere neighborhoods are sorely lacking. We are excited about the prospect of an additional 40-acres of open space on-site. Linking existing open spaces and assets to the Suffolk Downs site will increase access to and usability of limited open space resources, many of which are high quality and water-oriented. As we have stated previously, the East Boston Greenway has the potential to link open spaces between Boston Harbor and the Belle Isle Marsh Reservation to include Piers Park, Bremen Street Park, Constitution Beach, Bayswater Street Urban Wild, and the Belle Isle Coastal Preserve.

To further improve the current open space plan, the site should incorporate both passive open spaces and active community-friendly recreational areas. This includes incorporating a range of recreational activities from active uses (playgrounds, soccer field, basketball, tennis) to more passive parks for meditation and leisure activities.

Per the Article 80 accessibility checklist, the only government buildings surrounding the project site are Revere police and fire stations located on Revere Beach Blvd. There is no mention of libraries, community centers, recreational facilities or others. This redevelopment project is an opportunity to incorporate valuable community assets that create a sense of place and destination for both the East Boston and Revere neighborhoods. We would encourage the proponent to work with the City and members of the community to explore the possibility of incorporating some community spaces into the overall Master Plan.

With a development site of this magnitude, a comprehensive signage system will be necessary to ensure both residents and the public are aware of on-site amenities. Signage can complement the larger effort to create a sense of place and awareness of abutting community amenities and public resources.

The Friends of the Boston Harborwalk, a group dedicated to promoting the use of the Boston Harborwalk, has created a successful neighborhood signage master plan that tells the story of Boston Harbor through interpretive signage placed throughout eight waterfront neighborhoods. A campus of this size can benefit immensely from a similar signage program that not only orients its visitors but also creates a sense of history and place.

Sustainability/Green Building/Carbon Free Boston

On June 14, 2018 the Boston Planning and Development Board adopted the Smart Utilities Policy for Article Development Review. This project proposal was filed a short time ahead of the City's adoption of the Smart Utility Policy. However, due to the length of project build out and proposed building life, we strongly recommend that the Smart Utilities Policy be applied to this project.

Moreover, Boston Harbor Now is concerned that the project falls short of meeting the City of Boston 2050 carbon free goal. We feel strongly that projects permitted today must be in line with the City's goals. The proponent should do more to articulate the kind of low-carbon standards that will be employed throughout the entire site as part of a comprehensive carbon mitigation strategy, a piecemeal approach is not acceptable for a project of this magnitude.

Exemplary carbon mitigation should, at minimum, include high-performance buildings, low carbon transportation options, and district renewable energy. We were disappointed to learn that, according to the proponent's cost benefit analysis, developing a district energy/microgrid system is not financially feasible at this time. There are organizations and stakeholders with necessary expertise that are well-positioned and willing to analyze this determination.

Our brief inquiry suggests that while there may be studies that arrive at the same conclusion as the proponent, there is plenty of research to suggest that with strategic planning and the right key players, construction of a microgrid is possible.

Finally, we are glad to see the incorporation of double duty solutions like the construction of a berm bike/pedestrian path along Bennington Street. This will not only improve pedestrian and bicycle travel along this busy stretch but will also prevent on-site flooding due to the overtopping of flood gates during coastal storm events.

Climate Change Resiliency

The Suffolk Downs redevelopment project should epitomize both climate resiliency and carbon mitigation. As one of the largest development projects in the Northeast, it represents an unprecedented opportunity to provide both environmental and economic benefits to the City of Boston.

We commend the proponent for including, in the DEIR, a detailed analysis of climate resilience impacts and district level coastal flood risk with future sea level rise predictions. We are glad to see that the proponent plans to elevate grades across their site consistent with current and anticipated flood risk.

Resiliency is an all-inclusive term that extends beyond climate change. Social resiliency is equally critical to the capacity of a community to bounce back from storm events quickly and effectively. In addition to climate resiliency, the proponent should work with the City to consider the benefits of shelter in place facilities, where they should be located, and how they can be designed to function as double-duty spaces when not in use.

With climate change increasing at a more rapid rate than initially predicted, a single layer resiliency solution will not suffice. We strongly recommend incorporating redundancy and layers of resilient infrastructure to the entire 161-acre site. The proponent should continue to work with owners of adjacent property and public infrastructure to identify ways in which the resiliency of the project and adjacent neighborhoods can be further enhanced.

In his October 2018 address to the Greater Boston Chamber of Commerce, Mayor Walsh revealed the Resilient Boston vision -- the City's latest climate change vision. As the proposal moves into the final EIR stage, it should address how the project plans to incorporate portions of the Resilient Boston Harbor vision into the plan and make the most of this unique opportunity to create an exemplary climate-resilient and climate-forward development.

Transportation

We are pleased to hear that the proponent is supportive of new and increased ferry service in the area. While we know that the project does not currently benefit from direct access to the water's edge, we feel an analysis and exploration of the project's ability to support potential future water transportation expansion in Boston's Inner Harbor is justified.

It is unclear if the DEIR traffic analysis accounts for all of the service vehicles need for the entire Suffolk Downs campus and operations. We find it unlikely since the entire program for the site is yet to be determined. We would recommend an initial traffic analysis with estimated counts followed by regular updates as proposals are drafted and traffic plans solidified.

We commend the proposal for incorporating walkable, dense, mixed-use, low parking ratios for a non-core site, high-frequency shuttle connections to both Blue Line stations, and a proposed bike network for the site as fundamentally consistent with low-carbon transportation outcomes. While this is not the silver-bullet carbon reduction answer, we applaud the proponent's efforts to implement these strategies.

Thank you for your time and consideration.

Sincerely,



Jill Valdes Horwood
Director of Policy