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January 23, 2020

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

Kathleen Theoharides, Secretary  
Executive Office of Energy and Environmental Affairs  
Attn: Paige Czepiga, Assistant MEPA Director  
100 Cambridge Street, Suite 900 (9th floor)  
Boston, MA 02114

Re: FEIR - Suffolk Downs Redevelopment Project (EEA 15783)  
East Boston, MA

Dear Ms. Czepiga,

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

The FEIR evaluates the “pro-residential” program, which consists of less office space and more residential space than the previous preferred alternative. It reduces impervious surface area by 14 acres from the Draft Environmental Impact Report (DEIR) and reduces by 2,600 the number of parking spaces on site. The project site is identified in the Imagine Boston 2030 report as a key site for Boston’s future growth, specifically with respect to the creation of housing and targeted for new mixed-use development. It is also historic marshland and in a floodplain.

#### Urban Design

Boston Harbor Now continues to support the project’s commitment to create 40-acres of publicly accessible open space on site. The proponent has taken steps since the DEIR to ensure that the space is available to the public and welcoming to the entire community through the deeding of some of the land to the City of Boston and the use of conservation easements. The proponent has also made sure that the site incorporates both passive open spaces and active community-friendly recreational areas. As advocates for high-quality public spaces, we are excited by the extensive open space that runs through the project site and includes Sales Creek

and Horseshoe Pond. While we applaud the dual use of this space in the proponent's plan to reduce or eliminate flooding impacts to adjacent neighborhoods (the FEIR Preferred Alternative includes flood mitigation efforts such as buffers to and daylighting of Sales Creek, floodable open spaces, etc.), we are concerned that more frequent or intense storm events may severely restrict actual public use. If this open space becomes unusable to the public in the future, we hope that final designs can create both effective flood storage and usable open space.

Further, as the site is proximate to the Belle Isle Marsh Reservation, a state-designated Area of Critical Environmental Concern, we would also recommend close coordination of the project with local advocacy groups to ensure minimal impact to the marsh. The FEIR details steps taken to protect the marsh from stormwater runoff, which we support. As one of the last remaining salt marshes in Boston, it is critical that we protect the resiliency functions that this area provides to the community and the region. This project should strive to not only protect, but enhance, this valuable resource.

Boston Harbor Now is also cognizant that a development project of this size in such close proximity to the marsh is likely to increase visitation to the marsh by neighbors, dog owners, etc. Currently, there is only one full-time Department of Conservation and Recreation employee to manage the entire Reservation, and this increased visitation may require additional resources to be dedicated to protecting the marsh and supporting more usage as the project approaches full build-out.

#### Sustainability/Green Building/Carbon Free Boston

As noted in the FEIR, the proponent has included several measures to increase the energy efficiency of the project and to reduce greenhouse gas emissions associated with the full build-out of the site. We are encouraged that the project now includes 2 MW of solar, 20% green roof-top coverage, and some passive house construction.

The FEIR Preferred Alternative, the "pro-residential" program, will create 7,150 housing units in the City of Boston as well as 2,850 units in Revere. This will help the City of Boston to reach its goal of adding 69,000 new housing units by 2030, a much-needed increase. However, we continue to believe that it is critical that these units are built to a standard that meets the City's 2050 carbon-free goal. A project of this size and notoriety should be built to the highest standard of sustainability in design and construction.

#### Transportation

At full build-out, the project is anticipated to create approximately 69,000 additional daily new vehicle trips and an additional 30,000 transit trips daily. While we applaud the proponent for their commitment of funding to improve public transit at the Beachmont and Suffolk Downs Blue Line stations, as well as their commitment to help fund local roadway improvements, we are concerned about the project's impact on present and future traffic and congestion on state highways, local roads, and on the MBTA transit system. In addition to the mitigation measures

already agreed to, we believe that alternative, creative approaches to relieving the transportation impacts should be considered. These could include coordination with the existing and proposed water transportation system that is available on Boston Harbor. This would have the benefit of relieving the above-mentioned burden and potentially providing an alternative means of accessing downtown Boston for the local community.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Aaron Toffler', written in a cursive style.

Aaron Toffler  
Director of Policy  
Boston Harbor Now