



SMART GROWTH AND REGIONAL COLLABORATION

January 19, 2018

Matthew A. Beaton, Secretary  
Executive Office of Energy & Environmental Affairs  
Attention: MEPA Office – Page Czepiga, MEPA #15783  
100 Cambridge Street, Suite 900  
Boston, MA 02114

RE: Suffolk Downs Redevelopment, MEPA #15783

Dear Secretary Beaton:

The Metropolitan Area Planning Council (MAPC) regularly reviews proposals deemed to have regional impacts. The Council reviews proposed projects for consistency with *MetroFuture*, the regional policy plan for the Boston metropolitan area, the Commonwealth's Sustainable Development Principles, consistency with Complete Streets policies and design approaches, as well as impacts on the environment.

MAPC has a long-term interest in alleviating regional traffic and environmental impacts, consistent with the goals of *MetroFuture*. Furthermore, the Commonwealth encourages an increased role for bicycling, transit and walking to meet our transportation needs while reducing traffic congestion and vehicle emissions. Additionally, the Commonwealth has a statutory obligation to reduce greenhouse gas emissions (GHG) by 25% from 1990 levels by 2020 and by 80% from 1990 levels by 2050. In addition, MassDEP issued new regulations last year to meet the GWSA's emission reduction requirements. This ruling and issuance of MassDEP's regulations reasserts the state's obligation to meet these goals.

The HYM Investment Group (the Proponent) proposes to develop 16.5 million square feet (sf) at the former Suffolk Downs horse racing facility. Of the 161 acres that make up the Suffolk Downs Redevelopment's Master Plan Project (the Project), approximately 109 are in Boston and approximately 52 are in Revere. The Project includes approximately 11 million sf of development in Boston and 5.5 million sf of development in Revere. Full-build out of the site is anticipated to occur over a period of 15-20 years.

The Project also includes an initial development phase (Phase 1) which is responsive to the Request for Proposals from Amazon for a second corporate headquarters. The Proponent has requested a Phase 1 Waiver that will allow the Proponent to proceed with this portion of the Project prior to completing the MEPA process for the entire Project. Phase 1 includes construction of two office buildings (each 260,000 sf, or 520,000 sf total), an internal access driveway, and 520 structured parking spaces. Phase 1 would be located within the southeastern corner of the Project Site near the Suffolk Downs MBTA Blue Line station.

MAPC has reviewed the Expanded Environmental Notification Form (EENF) and has concerns that primarily address provision of an on-site shuttle service, a program that outlines monitoring of mode share goals and a mitigation timeline. Furthermore, we have comprehensive comments addressing wetlands and climate adaptation, climate mitigation and building resilience, housing, urban design, and specific comments addressing the Phase 1 waiver.

These issues, proposed recommendations, and questions are detailed as an attachment to this letter. MAPC respectfully requests that the Secretary incorporate our comments as part of the Certificate issuance for the Draft Environmental Impact Report (DEIR).

Thank you for the opportunity to comment on this project.

Sincerely,

A handwritten signature in black ink, appearing to read "Marc D. Draisen".

Marc D. Draisen  
Executive Director

**Metropolitan Area Planning Council (MAPC) comments on  
Suffolk Downs Redevelopment, Expanded Environmental Notification Form, MEPA #15783**

**Transportation**

At full-build, the Project's two Master Plan alternatives are forecast to generate between 33,320 and 33,760 vehicle trips per day. In order to determine the full transportation impacts of the Project and how best to mitigate those impacts, we have outlined areas for further study and proposals to reduce the number of single-occupancy vehicles (SOVs) trips to/from the site.

Transportation Analysis

MAPC recommends that the Proponent use the services of the Central Transportation Planning Staff (CTPS) to estimate future traffic volumes for the study area based on the CTPS regional model. The modeling effort can be designed to depict the actual transportation network as closely as possible, including attributes such as capacity and travel speeds along with roadway links. With factors in the model such as socio-economic projections, CTPS will be able to accurately estimate the number of vehicle trips anticipated to be generated by the project and assign vehicle routes based on roadway capacity and travel speeds. In addition, the model will be able to derive an internal capture rate for the site and to make assumptions for transit and non-motorized trips. There is precedence for utilizing the regional travel model as it is being applied for the Union Point development in Weymouth.

MAPC also recommends including Revere Beach Boulevard and Ocean Avenue as part of the study area.

Blue Line Impacts

The Draft Environmental Impact Report (DEIR) should analyze whether the Project will impact service on the Blue Line, especially during the peak morning and evening commute hours. The Proponent should work with the MBTA to determine whether service may need to be augmented in order to maintain appropriate levels of peak hour service (e.g., signalization).

MBTA Bus Impacts

The DEIR should include a summary of the specific MBTA bus routes that will be impacted by the Project, the estimated increase in trips by route, and whether those routes will experience over-crowding. The Proponent should work with the MBTA to determine whether service levels need to be increased to address crowding, and if so, those efforts should be added to the mitigation plan.

The DEIR should also study the need for new MBTA bus stops either within or adjacent to the Project site to provide enhanced access. This should include improved bus connections to and from the Suffolk Downs and Beachmont Blue Line stations.

On-Site Shuttle Service

The Proponent should commit to operating an on-site shuttle service for the Project's employees, residents, and visitors to the site. Specifically, the on-site shuttle would run as a continuous connection providing access to the various buildings within the Project. The shuttle service should be designed to enhance connectivity with existing MBTA subway and bus connections. To ensure significant mode shift, strong connectivity among these transportation options is critical. The DEIR should include a conceptual map of the shuttle service area and provide information about anticipated routes, stops, and schedules. MAPC recommends the shuttles use alternative fuels (e.g., Compressed Natural Gas, Liquefied Natural Gas) or be electric. By comparison, the previous development proposal for this same site, the Mohegan Sun Casino, committed to a robust shuttle system connecting the site to the Suffolk Downs Blue Line station. This Master Plan proposal is yet a larger development in terms of square footage and traffic generation, so a shuttle should be all the more necessary.

Street Connectivity

New street connections to the east and west of the site are difficult, with the Blue Line tracks to the west and the oil tanks to the east. However, new connections to the north and south may be possible, such as a potential connection to Walley Street in the southeast corner near Suffolk Downs station, or a connection to Waldemar Avenue to the south. The Proponent should explicitly study these possibilities and report on them in the DEIR.

## Mode Share Goals, Mitigation Commitments and Timeline, Monitoring and Reporting

### *Mode Share Goals*

The DEIR should delineate a program that ensure specifically defined mode share goals are accomplished over a specified time frame related to the phases of project development. Along with specific steps to achieve these goals, the Proponent should provide annual updates, publicly sharing the results. Mode share goals should result in an increase of public transportation, shuttles, walking, and bicycling, and a decrease for single-occupancy vehicle (SOV) use.

Developing and monitoring mode share goals is a central component of TIA preparation as outlined in the *EOEEA/MassDOT Guidelines for Traffic Impact Assessments (TIAs)*. Specifically, the TIA Guidelines state: “*The TIA should include an assessment of the mode split assumptions, as well as the Proponent’s plan to maximize travel choice, promote non-SOV modes, and achieve the assumed mode shares (p 17).*” The Proponent needs to define mode share goals clearly, with specific targets for automobiles (SOV and shared), bicycle, pedestrian, Blue Line (Suffolk Downs and Beachmont Stations), and bus.

### *Monitoring and Reporting*

The scope should require the Proponent to develop a monitoring program for all modes. The monitoring program should have measurable milestones and serve as a benchmark for progress in meeting the mode share goals and other transportation objectives, including changes in parking, local and regional traffic, and public transportation. It should outline contingency measures that will be undertaken if these benchmarks are not met. The Proponent should provide annual updates, publicly sharing the results. The intent of the transportation monitoring program is to confirm that actual changes are consistent with forecasted changes. With a monitoring program, the actual impacts of a project can be determined and additional mitigation measures identified, if necessary. Shortfalls in meeting mode share or other targets can be identified and remedied. The need and schedule for the implementation of additional mitigation measures will depend on the results of the transportation monitoring program.

### *Mitigation Commitments and Timeline*

The scope for the DEIR should require the Proponent to outline specific mitigation commitments, plus a timeline that will address the Proponent’s contributions to programming for infrastructure and roadway improvements. A scope and timeline of mitigation commitments should also be included in the Section 61 findings as a basis for subsequent permitting.

Plans for the long-range maintenance and upkeep of infrastructure improvements (e.g., new and existing roadways, transit improvements, and bicycle/pedestrian infrastructure) should also be included. The Proponent needs to ensure that significant off-site transportation improvements are completed prior to the opening of project phases that are expected to generate impacts that will be mitigated by those improvements.

For the Boston portion of the development, these transportation mitigation and monitoring measures can be most effectively implemented by coordinating with the Boston Planning and Development Agency’s (BPDA) Cooperation Agreement and the Boston Transportation Department’s (BTD) Transportation Access Plan Agreement. These will address the details of how the transportation monitoring program will be implemented in Boston.

### Transportation Demand Management (TDM)

MAPC applauds the Proponent for proposing an extensive Transportation Demand Management (TDM) program (e.g., car-sharing, Hubway, on-site transportation coordinator) and we look forward to reviewing strategies to reduce SOV travel and encourage use of alternative transportation modes in the DEIR. While the Project site is well served by public transportation, public transit needs to be strongly promoted for employees, residents, and visitors. We recommend the TDM program also include:

- A greater commitment from the Proponent to promote future employer/resident incentives such as employer/resident subsidized transit passes (e.g., through tenant lease arrangements).
- Electric vehicle charging stations where appropriate in parking areas. Infrastructure should be built-in to accommodate additional charging stations.

### Parking

Although the EENF states that the Phase 1 component of the Project will require 520 parking spaces (1 space per 1,000 sf) and that the site currently has an existing 3,028 parking spaces, the document does not identify the total number of spaces or any preliminary numbers for the Master Plan as a whole. The total number and allocation of proposed parking spaces by land use type needs to be provided in the DEIR as a baseline for full build-out.

### *Shared Parking*

MAPC was pleased to read that the Proponent proposes implementing a shared parking program. A shared parking program that does not overbuild parking would encourage and reinforce the use of available alternative modes of transportation to access the Project, including Blue Line, bus, shuttle service, as well as walking and bicycling. We look forward to reviewing a more comprehensive parking analysis that quantifies how shared parking will be developed and meets the projected parking needs of the Project in the DEIR.

### *Structured Parking*

While EENF mentions that the majority of parking proposed for the Project's Master Plan will be structured, the document neither identifies the number of spaces nor indicates where these spaces will be located. The distinction between below-grade and at-grade parking needs to be clearly outlined in the DEIR. Also, plans for future adaptability of structured parking should be explored for the potential productive reuse of the space, should parking demand decrease in the future due to emerging technologies.

### *Parking Management Strategies*

In addition to shared parking, other parking management strategies the Proponent should consider applying to reduce and manage the supply of available parking include, but are not limited to unbundling parking for residents, and offering parking cash-out incentives for employees. We ask the Secretary to require the Proponent to evaluate these alternatives in the DEIR.

### Pedestrian/Bicycle Access

MAPC is pleased the Proponent intends to develop multi-use paths to and through the site. A complete sidewalk system will allow full pedestrian and bicycle access and connectivity. Existing and proposed bicycle and pedestrian routes, both within and connecting the site to nearby areas should be clearly identified in the DEIR. To promote pedestrian and bicycle usage, the Project should include appropriately placed crosswalks, signage, short and long-term bicycle parking spaces, and Hubway stations, as well as amenities such as benches, lighting, and landscaping.

The pedestrian and bicycle plan should strengthen pedestrian and bicycle connections to and within the site, particularly to the Suffolk Downs and Beachmont MBTA stations. Pedestrian and bicycle access should also improve connections to adjacent neighborhoods through the Project site, including open space.

The Suffolk Downs Project provides a unique opportunity to connect our trail systems with an "open space ribbon" through the site and connecting to the Blue Line and regional trails beyond. We request that the following trail connections be studied as part of this Project:

### *Suffolk Downs Site*

The Project should provide a roughly East/West shared use path through the site, connecting the Suffolk Downs MBTA station with Belle Isle Marsh to the east and Chelsea Creek to the West.

### *East Boston Greenway Extension*

The East Boston Greenway (EBG) Extension is a continuous shared use path from the Boston Harbor near Maverick Station in East Boston and currently terminates at Constitution Beach, just short of Orient Heights Station. This Project should develop concepts to extend the EBG from its terminus through Orient Heights Station area to the Suffolk Downs station and the Project site. Routing shall be investigated in two alternatives: 1) along the Blue Line and 2) to the east through Belle Isle Marsh.

### *Chelsea Creek*

The west end of the Project site should be connected by a waterfront trail along Chelsea Creek. The potential trail would use an MBTA owned unused railroad right-of-way that extends north from Chelsea Street (and the bridge)

along Chelsea Creek to just west of the Project site. The trail could continue along the creek to Revere Beach Parkway. We recommend that the Proponent study the feasibility of this trail.

### Construction Impacts

According to the Proponent, the estimated volume of fill within LSCSF (Land Subject to Coastal Storm Flowage) for the Phase 1 Project is approximately 19,000 cubic yards. Assuming a commercial dump truck holds between 10-14 cubic yards, that equates between 1,357 to 1,900 dump truck loads of fill just for Phase 1.

The DEIR should provide additional information regarding the estimated number of truck trips, the proposed routes, duration, and trip frequency for the entire Project, particularly for adding fill within LSCSF. The Proponent should also address steps they will take to minimize truck traffic and noise disruption to surrounding neighborhoods. Given the large amount of fill needed for the buildout of the Master Plan, the DEIR should also discuss the alternative sources of fill as well as any potential impact on the source area(s).

## **Environment**

### Wetlands

The Proponent should provide greater detail regarding wetlands encroachments and efforts to minimize temporary and permanent impacts. The Proponent should also describe and delineate changes in grade in the buffer zone to the Bordering Vegetated Wetland (BVW), Sales Creek, and for the Riverfront Area. Phase I grading shows fill to the edge of the infield pond and indicates that the limit of work extends to the wetlands flags for the intermittent stream. The Proponent should consider alternatives to lessen buffer zone encroachment. The DEIR should evaluate the impact of moving Tomasello Road, the primary site access road, closer to the BVW marked by "Flag Series A," and consider alternatives to relocating Tomasello Road.

### ACEC (Areas of Critical Environmental Concern)

The Proponent should provide greater detail on activity in the ACEC and explain how they meet the standard of no adverse impact to the wetlands interests identified for the Rumney Marsh ACEC (flood control, prevention of storm damage, protection of land containing shellfish, and fisheries; prevention of pollution, protection of wildlife habitat, and protection of public and private water supplies). The DEIR should consider alternatives to proposed roadways crossing the ACEC, including daylighting Sales Creek and utilizing bridges over the creek where crossings are necessary. This would improve flood storage and the health of the creek, as well as provide potential assets to the site design.

Mitigation for wetlands impacts should focus on wetlands restoration within the Rumney Marsh ACEC, particularly Sales and Green Creeks and the Belle Isle Marsh. Given that the Project will be constructed in phases over a 15 to 20 year period, the timing of the implementation of natural resource and open space improvements should be coordinated with the development phases.

### Stormwater Treatment

MAPC commends the Proponent for using the Boston Water and Sewer Commission's projections for the 10 and 100-year design storms in 2100 under a medium emissions scenario. The Department of Environmental Protection (DEP) has issued a draft Pathogen Total Maximum Daily Load (TMDL) for the Boston Harbor Watershed. As this project presents relatively few constraints on stormwater management, and the site drains to Outstanding Resource Waters and includes an ACEC, the Project should therefore meet the highest standards of stormwater treatment. The Proponent should utilize stormwater Best Management Practices (BMPs) that maximize treatment of pathogens. The DEIR should include evaluation of Low Impact Development and Green Infrastructure Best Management Practices, and the Project should incorporate these to the maximum extent feasible.

### Climate Adaptation

The site has a complex hydrology, as it contains Land Subject to Coastal Flooding, and is also subject to flooding from rain events. Sales and Green Creeks drain stormwater from Revere. A Department of Conservation and Recreation (DCR) operated tidegate closes during high tides. The DCR also pumps stormwater from Sales Creek when high tides prevent the release of stormwater. Failure to follow this regime results in flooding in Revere. The Proponent proposes significant fill in order to accommodate 40 inches of sea level rise and allow occupants of the site to shelter in place. The Proponent should provide proposed contours and elevations for all fill. The DEIR should

consider the impact of the loss of flood storage on the site and its surroundings. The Proponent should evaluate the impact of a significant hurricane or northeaster that combines high tides, coastal flooding, and heavy rain. Considerations should include 1) whether the existing pumping system is adequate to prevent flooding under the proposed conditions, 2) how proposed drainage changes will affect drainage from the channel associated with Flag Series A, 3) off-site impacts associated with redirecting coastal flooding, and 4) whether stormwater from large rain events will be redirected, particularly to the lower elevation Beachmont area, and to the directly adjacent residences at Waldemar Avenue.

### **Climate Mitigation and Building Resilience**

The EENF includes some plans for energy efficiency, but can go much further to realize deep carbon reductions and long-term cost savings. The proposed Project has a large footprint and would lead to a significant increase in greenhouse gas emissions if only built to stretch code standards. The cities of Revere and Boston, as part of the Metro Mayors Coalition, have a net-zero by 2050 goal, and this Project could significantly set back efforts to reach this goal if not built to high-efficiency standards.

The Project should take full advantage of the greenhouse reduction strategies such as passive design, having a tight envelope and avoiding excessive windows and curtain walls, using highly efficient lighting and HVAC technologies, and adding solar PV and renewable thermal technologies. According to an analysis conducted by the MA Department of Energy Resources, by implementing these strategies, the development could cut emissions by up to 85 percent. They will also enhance the buildings' resilience to severe climate events. For example, with passive design, buildings may remain habitable even during a power outage.

### **Housing**

In a number of locations, the Proponent notes that the proposal is consistent with MetroFuture, the regional plan for the Boston metropolitan area. We concur that the mix of uses to create several new neighborhoods, complete with residential, retail, restaurant, office, and outdoor public recreational spaces and plazas, all in a dense transit-oriented location, supports the overall goals of MetroFuture. However, we would note that there are several areas where alterations to, or clarifications of, the proposal would improve consistency with the regional plan, and we encourage the Proponent to address these in the DEIR. In addition to the transportation, environmental, and site design issues raised elsewhere in this letter, the Proponent should be encouraged to address the affordable housing elements of the Project in the DEIR, since a greater proportion of affordable housing tends to reduce the number of cars owned, the number of auto trips, and VMT. Specifically, we would like the Proponent to include the number of affordable units, their level of affordability, tenure (ownership v. rental), and the bedroom distribution.

The Transportation Analysis (page 5-9 of the EENF) lists the number of units in the mid-rise, high rise, and senior unit types, for purposes of trip generation analyses. However, there is no listing anywhere in the report noting the details on the number of units by building type including the townhomes (not detailed in the transportation analysis), the number of units by bedroom number, and the details of affordability. MAPC encourages the Proponent to incorporate the following changes or clarifications into the DEIR for the Project:

- In addition to meeting the Inclusionary Zoning requirements of the City of Boston (13% of total proposed units), the Proponent should commit to increasing the total number of affordable units through use of the linkage payments for the commercial space to be built, or by other means. MAPC feels that a higher goal of 15% or 20% is more appropriate for a development of this scale. Considering the City's goal of minimizing displacement in the adjacent East Boston community, and also considering similar concerns in neighboring Revere, a higher percentage of affordable units is appropriate.
- There should be a similar commitment for affordable units in the City of Revere (currently at 8.1% affordable on the state's Subsidized Housing Inventory), even though that City does not have a required inclusionary percentage.

- The affordable units should be constructed on site, and incorporated into structures/neighborhoods throughout the proposed development in such a way as to prevent the segregation of lower-income households.
- The development should include a mix of 1-, 2-, and 3-bedroom units, to ensure that there is housing for all types of households, including families, and these units should be distributed throughout the site in both municipalities. The bedroom mix in the market and affordable units should be the same.
- As noted elsewhere in this comment letter, in order for the transit-oriented nature of this proposal to be successful, an internal shuttle system is critical to provide the residents with access to the Blue Line stations. The DEIR should outline this commitment to such a shuttle.

## **Master Plans**

The EENF includes a review of the relevant sections of the Imagine Boston 2030 Master Plan. For the DEIR, the Proponent should consider Revere's planning efforts as they relate to the project site. First, Revere is working on an update to its Open Space and Recreation Plan (OSRP), which should be completed by the Spring of 2018. The plan will include a discussion of the environmental and open space resources on site. Additionally, the city is about to embark on a full citywide Master Plan, which should commence sometime in early 2018. Thus, the timeline for the preparation of that plan is concurrent with the production of the DEIR. MAPC urges the proponent to work with Revere in understanding the relevancy of city's Master Plan as it relates to the Suffolk Downs site. MAPC is working closely with Revere on both the OSRP and Master Plan.

## **Urban Design**

### Transit-Oriented

The transit-orientation of the district is a primary feature and of critical importance to the function and connection of the future uses. The proposed transit-oriented squares at Suffolk Downs and Beachmont are a great concept for placing transit at the center of the district. However, the major shortcoming of these squares is that the transit station will not be located in them. Major effort in design, configuration and amenity must be focused on minimizing the perceived and real gap in distance from the transit-oriented squares to the transit stations. As designed, this gap at Suffolk Downs is approximately 1,000 feet and approximately 600 feet at Beachmont. The transit-oriented squares must also accommodate transfers and connections between other modes and function as transit hubs. This accommodation should include Hubway stations, integrating shuttle bus pick-up and drop-off areas, private vehicle, taxi, and ride share pick-up and drop-off areas, and other amenities such as a seating, shelter, and lighting.

Additionally, the transit-orientation of the district is unique with transit access offered by two stations. The Master Plan approaches both stations in a similar manner with the transit-oriented squares and similar street and building configurations and offerings for uses and amenities. Flexibility should be retained in the Master Plan to explore the potential for the two stations to have a differentiated approach. If one station were positioned more as the front door and the other as the back door, they may attract different uses and support transit-users to use the stations differently. For example, district residents or office workers may prefer one station over the other if they were approached differently from a land use and urban design perspective.

### Massing and Context

The Proponent should explore variations in the overall Master Plan building heights and massing that may place additional building height at the center of the site where it is buffered from the surrounding context or place additional building height near the transit stations to strengthen the transit-orientation of the district. Placing the lowest buildings at the perimeter is also beneficial to the surrounding context and reduced wind impacts. The context sensitivity appears to be most out of alignment at the southern edge and southwestern "tail" of the district. These areas may benefit from a building type that provides more of a transition than currently illustrated. This new building type would offer a middle step between the extension of the Waldemar Avenue context and the large scale podium buildings shown along the southern edge in the current Master Plan. A smaller building type in

the southwestern “tail” of the Project may allow the entry roadway to be double-loaded with buildings on both sides adding to the district walkability and vitality as discussed in additional detail in the comment below.

#### Walkability and District Vitality

The Proponent should explore maximizing the opportunity for vitality in the district through the design of the street network, disposition of active ground floor uses, and connections to transit and open space. For example, would the district be more vital and walkable if the retail uses were concentrated near one station rather than anchoring both stations? In the Master Plan, the two Blue Line stations are treated as equal amenities with the surrounding development similarly designed. In practical use, Suffolk Downs may be the favored station of the district as many users will prefer to walk in the direction of their train trip, which is likely to be inbound for most trips. District vitality and walkability may also benefit from further definition and differentiation of the two Blue Line stations and their relationship to the district.

The Master Plan street network also includes streets with buildings on only one side of the street. These one-sided streets may not provide the sense of district vitality and pedestrian-friendliness that is desired. It appears the street network could be adjusted in some of these locations to create streets with buildings on both sides. Nearly the entire length of Tomasello Drive is one-sided with buildings and the other side open to the oil tank farm frontage. The roadway on the eastern edge of the central open space is also one-sided. This may not provide the most optimal relationship between open space and development for walkability and district vitality.

#### Street Network and Connectivity

The Proponent should explore additional opportunities for street connections to the surrounding street network and maintain flexibility in the street network. Future connections may be vehicular or pedestrian, but the layout should support the future addition of new connections. For example, future connections to Walley Street or Waldemar Avenue may create new benefits for connectivity in and around the site. Additionally, streets that are pedestrian-only as part of the Master Plan, such as the “Sporty Spine” should be designed with adequate width to provide flexibility for possible conversion to be part of the vehicular circulation network in the future. Flexibility in the street network and connections will allow the Project to adapt to future traffic patterns.

#### Transition to Neighborhood Developments

The design of the structures should ensure that there is a good transition between existing neighborhoods and the higher density areas of the proposed development. We would encourage additional low-rise structures such as townhomes along a greater extent of the boundaries of the development (there is only one small section of townhomes along the southern Project border in the EENF). The Proponent should be required to prepare an additional development scenario that includes significantly lower-scale development near existing abutting neighborhoods and an increased density in the core of the site.

#### Neighborhood Impacts Open Space Connectivity

Impact of the proposed development on abutting residential neighborhoods should be analyzed, including impacts of shadow, loss of views, wind, and access to open space. The Proponent has indicated that a benefit to the surrounding residential neighborhoods would be the ability to access the open spaces within the proposed development; the DEIR should include details of the guarantee that the open spaces within the site will be open to the general public, and that the access to, and connections to, existing neighborhoods will be designed in a welcoming fashion.

#### District Comparisons

The Proponent should provide examples of comparable districts in order to better communicate the scale of the district and to show that the new district is context sensitive within Boston and Revere. These district comparisons should include characteristics such as average block size, street hierarchy and street types, open space types and sizes, building types, average building height, density, total units, total building area, length of Main Street district, and amount of retail area. This direct comparison of the proposed Master Plan characteristics to other recognizable local districts, or relevant examples nationwide, would clarify the similarities and differences that may exist between the Master Plan and its context.

## Phase 1 Waiver

While MAPC does not oppose the requested Phase 1 waiver, we request the Secretary to include the following three conditions as part of a waiver approval:

- The Phase 1 development should allow for direct shuttle access to Suffolk Downs Station. It appears in the illustrations that the intent is that this area provide pedestrian-only access. Note that Figure 5.1 Phase 1 Project Access/Circulation Plan does indicate that the existing access drive to the Suffolk Downs station remains; however, it is not clear whether this will be maintained as a potential shuttle access route for the full Master Plan buildout. The approval of a Phase 1 waiver should be conditioned to allow a direct connection between the Suffolk Downs station and a potential future shuttle route.
- The street network for Phase 1 should provide continuous sidewalks and bicycle accommodations to reinforce street vitality and walkability, and access to the Suffolk Downs station. This connection sets the stage for advancing the Master Plan as a true Transit Oriented Development. As illustrated in the EENF, the Phase 1 proposal does not appear to create the critical multi-modal connection that will serve as the transit-oriented front door of the development.
- The Proponent should provide additional information about the connectivity from the development to the Suffolk Downs station. In the EENF, a gap of approximately 1,000 feet exists between the development and the Suffolk Downs station. The EENF's design illustration appears to depict a disconnected gateway in which transit is not well-connected to the development.