



January 18, 2019

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 in 2017 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 16.2 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. Since the Expanded Environmental Notification Form (EENF) filing, the Proponent has reduced the Project's building program by approximately 300,000 sf.

The Project includes approximately 10.52 million sf of development in Boston and 5.68 million sf of development in Revere. The Proponent proposes to develop the site with a mix of uses (residential, retail, office, lab, hotel) connected and supported by new open space, neighborhood retail, and civic spaces allocated as follows:

- Commercial Office/Lab - up to 8,000,000 sf
- Residential - 7,150,000 sf (~ 7,200 units)
- Retail - 500,000 sf
- Hotel – 550,000 sf (~ 918 rooms)

The Project site is located in an area well served by public transportation. Two Blue Line Stations, Suffolk Downs and Beachmont, are adjacent to the Project with the majority of the Project site within a half-mile walk of these stations. Eight MBTA bus routes are also within close proximity to the Project site¹. The Project abuts Route 1A, which is a major commuter route and provides connections to downtown Boston and the regional highway network.

At full-build, there will be an estimated 15,250 parking spaces. The Project is forecast to generate between 76,810² and 65,276³ vehicle trips per day. The Project is a long-term development that will be implemented in phases over a period of 15-20 years.

¹ MBTA bus routes 119, 120, 424, 434, 448, 449, 450, and 459.

² CTPS/MassDOT Parameters (Table 6.6 Master Plan Adjusted Project Trips)

³ Expected TOD Parameters (Table 6.6 Master Plan Adjusted Project Trips)

The Proponent's Phase 1 Waiver request was granted on February 28, 2018. This initial development phase (Phase 1) was responsive to the Request for Proposals from Amazon for a second corporate headquarters, although Amazon has since decided to locate elsewhere. 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. Since Amazon will not be locating its second headquarters at this site, the Final Environmental Impact Report (FEIR) should definitively indicate the proposed program without Amazon.

MAPC has reviewed the Draft Environmental Impact Report (DEIR) and has concerns primarily in the areas of Project phasing and parking, monitoring of mode share goals, and a mitigation timeline. Furthermore, we have comprehensive comments addressing wetlands and climate adaptation, climate mitigation and building resilience.

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 FEIR.

Thank you for the opportunity to comment on this project.

Sincerely,

A handwritten signature in black ink, appearing to read "Marc D. Draisen". The signature is fluid and cursive, with a distinct loop at the end.

Marc D. Draisen
Executive Director

cc: Mayor Brian M. Arrigo, City of Revere
Robert O'Brien, City of Revere
Commissioner Gina Fiandaca, Boston Transportation Department
Tad Read, Boston Planning and Development Agency
David Mohler, MassDOT

**Metropolitan Area Planning Council (MAPC) comments on
Suffolk Downs Redevelopment, Draft Environmental Impact Report, MEPA #15783**

Alternatives Analysis

MAPC notes that, although encouraged by the Secretary, the DEIR did not include analysis of a reduced development alternative. A reduced development alternative would decrease the square footage and/or footprint of development, reduce impervious surfaces, generate less traffic generation, reduce fill in the floodplain, and increase open space. Specifically, the Certificate asked the DEIR to “provide conceptual plans and describe and quantify each alternative’s impacts on land alteration, creation of impervious area, impacts to wetland resource areas, ACEC, traffic generation, GHG emissions, parking, water use, and wastewater. This comparison should be provided in a tabular format with supporting narrative and conceptual site plans.” (Certificate, pp. 16-17) The Proponent should address this in the FEIR.

Instead of complying with the Secretary’s direction in the Certificate, the Proponent elected to continue with their originally proposed alternatives in the EENF, Program A and Program B, neither of which is a reduced development alternative. Both alternatives propose the same amount of total square footage, approximately 16 million. The difference between these two alternatives is not the total amount of development, but the mix of commercial, retail, hotel and residential uses. Without providing a detailed analysis, the Proponent stated that Program A is generally more impactful as it relates to traffic generation and other impacts compared to Program B. The analysis presented in the DEIR is based on Program A. Since Amazon’s decision to not locate a second headquarters at this site was announced after the issuance of the DEIR, the FEIR should specify the program they propose to advance and fully analyze its impacts and mitigation needs in the FEIR.

Identify Development Phases with Mitigation

The Secretary’s Certificate required that “the DEIR should identify proposed phases with supporting building program and site plan configurations. It will be particularly important to demonstrate that access to the Blue Line stations will not be impeded at intermediate stages of development, and that transportation/transit mitigation, greenhouse gas commitments, stormwater improvements, public open space, and other public benefits are phased proportionally to development. The DEIR should also address appropriate thresholds for provision of phased mitigation.” The Certificate also states that, “If appropriate, the mitigation implementation schedule should clearly note how mitigation will be provided in relation to project phasing; tying commitments to either completion of project square footages or generation of a specific number of traffic trips based upon project build out.” (ENF Certificate, pp. 15 and 29)

With the exception of urban design, the DEIR has not identified proposed phases with a supporting building program or with appropriate thresholds for provision of phased mitigation as required by the Secretary. This must be addressed in the FEIR.

While MAPC understands that the Project’s development program is intended to have flexibility between uses in order to meet changes in market demand, the FEIR must outline commitments to provide impact analysis at key build-out thresholds. At each stage, particular emphasis should be required with respect to:

- timing transportation mitigation such as public transportation improvements in advance of development; and
- phasing in parking supply to avoid overbuilding.

It is imperative that the Proponent provide greater detail on how the Project will be phased, as impacts are expected to vary over time as technology and transportation initiatives evolve. The FEIR must outline commitments to provide impact analysis for each phase or at key build-out thresholds. The Proponent should also ensure that all necessary off-site transportation improvements are completed prior to the opening of project phases expected to generate impacts that will be mitigated by those improvements.

Traffic Mitigation

The Proponent proposes to invest over \$50 million in off-site traffic mitigation measures at over 20 locations to support major improvements to regional and local routes and intersections. These improvements include the full reconstruction and signalization of Route 1A from Boardman Street to Winthrop Avenue, new ramp connections at the Route 1/Route 16 interchange, Winthrop Avenue corridor improvements from Route 16/Harris Street to Revere Beach Parkway, and improvements at Bell Circle and to Day Square. In addition, MAPC supports MassDOT's request that the Final EIR should consider modified mitigation for Route 1A that includes the following alternatives:

- No additional lanes
- An added northbound lane
- Transit-dedicated lanes
- An adjacent shared-use path

The DEIR identified two intersections that may need additional improvements:

- Winthrop Avenue at Route 16/Harris Street
- Winthrop Avenue at Tomasello Drive

These two intersections need to be closely monitored to determine if additional improvements may be needed.

Public Transportation Mitigation

Given the scale of the proposed Project, its potential traffic impacts, and the proximity of public transit services, it is essential for the Proponent to make public transportation a core component of its mitigation program. It is important to note that Certificate requested that *"The Proponent should provide robust connections between public transit serving the site and the Master Plan project. The access should be visible, fully integrated with the proposed buildings, and outfitted with ample accommodation for transit vehicles and with attractive amenities for passengers."* (Certificate, p. 21)

Station improvements may be needed to bring station infrastructure into a state-of-good-repair and to comply with current codes. The Proponent, as requested and in coordination with the MBTA, is in the process of conducting an engineering and architectural assessment of the Suffolk Downs and Beachmont Blue Line Stations. The scope of the station assessments will evaluate the station infrastructure conditions and compliance with current codes. The assessments will determine the type and cost of improvements that could be conducted as part of the mitigation. The FEIR should identify station improvements, which may be needed to bring station infrastructure into a state-of-good-repair and to comply with current codes. In addition, the MBTA is planning to conduct a forthcoming signal upgrade study for the Blue Line, which will assess Blue Line performance and infrastructure conditions as well as identify potential targeted upgrades and improvements.

While the Proponent has committed to providing roadway improvements in the DEIR, there should be a similar commitment to mitigate the project's impacts on public transportation. The Proponent needs to indicate how they will coordinate with the MBTA, specifically identifying how connections to and from the Project will be enhanced. The Proponent should partner with the MBTA by contributing to the cost of service improvements in an amount that is reasonably related to the Project's additional demand on transit services.

There are three such precedents for developers committing to public transit improvements through the MEPA process. The proponents for Encore Boston Harbor and XMBLY have committed to improve Orange Line service. The third precedent is in Kendall Square, where Boston Properties, the City of Cambridge, the Cambridge Redevelopment Authority, the MBTA, and MassDOT signed a Memorandum of Understanding, under which Boston Properties will contribute a transit improvement fee to support MBTA service improvements.

The Project site is well served by public transportation and benefits from adjacent MBTA Blue Line service as well as multiple MBTA local and commuter bus routes that operate within one-quarter mile of the Project site. It is therefore reasonable to ask the Proponent to contribute to the improvement and enhancement of these services, all of which will benefit the Project and its tenants.

MBTA Bus Routes

MAPC is pleased the Proponent has invested in a new stop and turnaround on Tomasello Drive for the MBTA Bus Route 119, identified opportunities to incorporate bus pull-outs on Route 1A at Tomasello Drive for inbound and outbound buses, and will continue to work with the MBTA to explore potential future bus routing and stops within the Project Site as demand is warranted by the Project.

Blue Line and Bus Route 119 – Increase in Ridership Demand

The Project is expected to increase ridership demand above “policy capacity levels” for both the Blue Line and MBTA Bus Route 119 in the Build Condition. Specifically, the Blue Line is projected to exceed policy capacity levels during off-peak hours. The MBTA’s Bus Route 119 is expected to exceed policy capacity levels for early morning and morning inbound trips.

The Proponent needs to identify additional mitigation and develop strategies to address these potential impacts in the FEIR. The Certificate asked the Proponent to calculate the cost to the MBTA to accommodate the unmet transit demand. This cost estimate should be provided in the FEIR.

It should be noted that there could be an even higher increase in ridership demand than originally projected by the Proponent. According to the Proponent, the model is very conservative in its estimation of transit share and transit ridership and has the potential to exceed this rate given the Project’s mixed-use nature and direct connectivity to the MBTA Blue Line stations.

Mode Share Goals, Mitigation Timeline, Monitoring and Reporting

Mode Share Goals

The FEIR should delineate a program that ensures 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, and publicly share the results. Mode share goals should specify a numerical target for increased use 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 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 specifically, with numerical targets for automobiles (SOV and shared), bicycle, pedestrian, Blue Line (Suffolk Downs and Beachmont Stations), and bus.

Mitigation Timeline

In addition to outlining specific mitigation commitments (as requested earlier in these comments), the Proponent should provide a specific and detailed timeline that will address the Proponent’s proportionate contributions to programming for infrastructure and roadway improvements. A scope and timeline of mitigation commitments should 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.

Monitoring and Reporting

It is imperative that the Proponent be required to develop a monitoring program for all modes. It is important to underscore that the Secretary’s Certificate stated that the “*DEIR should include a proposed monitoring program to evaluate assumptions regarding traffic generation, mode splits and, effectiveness of the traffic mitigation program and the TDM program. The Proponent should consult with MassDOT regarding the duration and frequency of monitoring, the identification of triggers for identification and implementation of additional improvements or programs.*” (Certificate, pp. 23-24)

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.

Shuttle

MAPC applauds the Proponent for proposing two new shuttle bus routes (inner loop and outer loop) for a privately operated shuttle bus system to encourage the use of public transit and to reduce auto-dependency. The inner loop will provide shuttle connections for internal trips made within the Project site. The outer loop will provide direct transit connections from the Project site to the MBTA Blue Line stations (Beachmont and Suffolk Downs), North Station, South Station, Chelsea Station (closest commuter rail station serving the Newburyport/Rockport Line), and the Seaport District.

A two percent shuttle mode share was assumed for Project trips occurring during the morning and evening peak periods. MAPC strongly urges the Proponent to aim for a more heavily utilized shuttle program. It is critical to point out that the Certificate states, *"I refer the Proponent to comments which support implementation of a shuttle service...and to facilitate a significant mode shift. Comments also recommend the use of alternatives fuels or electric shuttles to reduce GHG emissions."* (Certificate, p. 22) Advancing a robust shuttle system is critical. MAPC urges the Proponent to develop a heavily utilized shuttle and to include the estimated ridership of the shuttle program (inner loop and outer loop) in the FEIR. MAPC looks forward to reviewing refinements and modifications to the proposed routes (inner loop and outer loop) and the anticipated timing of route implementation in the FEIR.

MAPC also requests the following issues regarding shuttle services be addressed in the FEIR:

- When the proposed inner and outer loop shuttle services will be activated and how this relates to overall project phasing.
- While the Proponent has committed in the DEIR to explore the feasibility of providing an electric fleet for the inner loop shuttle, they should do the same for the outer loop.

Parking

At full-build, approximately 15,250⁴ parking spaces, the majority of which will be provided in structured garages, are proposed on multiple parcels. The FEIR needs to delineate clearly the number of parking spaces by project phase, land use type, location, and whether the spaces will be structured or at-grade.

The Proponent indicates that during build-out of the Project, parking usage will be monitored to avoid overbuilding of parking and managed via shared parking and unbundling of spaces. However, the DEIR does not provide specific plans regarding how parking will be monitored and managed. It is important to note that the Project's mixed-use nature and proximity to two MBTA Blue Line stations, multiple bus routes, and a shuttle service, provide the opportunity to require fewer off-street parking spaces. (See more below, under "Number of Parking Spaces.")

It is important to underscore that the Secretary's Certificate stated, *"The DEIR should identify the proposed parking supply for the Master Plan project, include a parking study that identifies assumptions and methodology used to project parking demand, provides the information identified in MassDOT's comment letter, and describe[s] its shared parking strategy (on- and off-site). The TDM Program should incorporate policies designed to minimize parking demand, including unbundling parking for residents, fees for parking and parking cash-out incentives for employees."* (Certificate, p. 23) The Proponent has elected to not respond to the Secretary's requirements regarding parking. As a result, they must be specified in the FEIR.

⁴ Of the approximate 15,250 proposed parking spaces, 3,028 are existing spaces.

Number of Parking Spaces

Although the Proponent claims that the proposed number of parking spaces already represents a reduced parking provision, they also acknowledge that the Project exceeds the City of Boston's parking recommendations for retail, residential, as well as office and lab uses, but does not provide the parking ratios associated with each land use type. The FEIR should clearly outline the proposed parking ratios for each land use type and explain why they have exceeded the City of Boston's parking recommendations as well as how they conform to the City of Revere's parking requirements. It is imperative that the Proponent make a concerted effort to minimize the number of parking spaces available at this site and maximize the extent to which the spaces can be shared.

Structured Parking

Plans for future adaptability of structured parking should be explored for the potential productive reuse of the structure(s), should parking demand decrease in the future due to emerging technologies.

Shared Parking

MAPC is pleased the Proponent proposes to utilize a shared parking approach to accommodate the parking needs of multiple uses (e.g., residential, hotel, and retail) to use parking more efficiently and reduce the parking garage footprint on-site. However, we remain concerned as the DEIR did not include a quantitative parking analysis that delineates how shared parking will be developed and enforced, how the shared parking approach will meet the Project's projected parking needs, and how many parking spaces can be avoided by following a shared parking approach.

Parking Management Strategies

In addition to shared parking, the Proponent should adopt other parking management strategies that reduce and manage the supply of parking. These strategies include, but are not limited to: unbundling parking for residents, offering parking cash-out incentives for employees, and requiring those who drive to the site to pay for parking. We ask the Secretary to require the Proponent to evaluate these alternatives and elaborate on how they will be implemented in the FEIR.

Interim Parking

The Proponent states that parking demand may be accommodated via the use of existing surface parking lots for interim parking needs during initial phases of the Project. The specific number of proposed interim surface parking spaces and schedule should be specified in the FEIR.

Curbside Management

Approximately 557 on-street parking spaces are proposed to be used for time-limited shared use (e.g., use of open space, retail customers, and visitors of office tenants and residents). On-street parking will be time-limited to help manage parking space use and discourage long-term on-street parking uses. A time-limited shared use on-street parking plan should be provided in the FEIR. At a minimum, this plan should include locations and land uses served. The Proponent needs to clarify whether the on-street spaces will be under municipal jurisdiction and how they will coordinate with the cities of Boston and Revere to determine timing and cost of parking.

The FEIR should show clearly where pick up/drop off areas will be designated for buses and shuttles as well as how on-demand car services will be accommodated.

The Proponent should specifically explore spaces proximate to MBTA stations to accommodate TNC service. Estimates and assumptions for future demand of such services should be quantified and explained. Plans to accommodate a potential increase to on-demand services should be specified.

Advancement of Shared Vehicle Technology

Over the period of project build out, the Proponent should study the potential implications and opportunities that the rapid advancement of shared autonomous vehicle technology presents. The FEIR should describe how the Project will anticipate these changes, including flexibility in design to accommodate rapid shifts in transportation technology and travel behavior.

Similarly, the Proponent should also give consideration to integrating shared micro-mobility services (e.g., scooters, e-bikes, one-wheels) within the Project. This includes on- and off-street parking, storage within buildings, and roadway infrastructure maintenance and management. While it might be difficult to anticipate ongoing changes in micro-mobility technology, the Proponent should at least create a plan to monitor changes in technology and demand, and to respond over time.

Transportation Demand Management (TDM) Plan

As previously stated in our comment letter addressing the EENF, MAPC applauds the Proponent for proposing a strong TDM program (e.g., car-sharing, bikeshare, on-site transportation coordinator). However, several components of the TDM plan could be strengthened with more specifics.

Although the Project site is well served by public transportation, public transit needs to be strongly promoted for employees, residents, and visitors. The TDM program should include a greater commitment from the Proponent to offer incentives for using public transportation. This could be done by promoting future employer/resident incentives such as employer/resident subsidized transit passes (e.g., through tenant lease arrangements). It is important to note that the Certificate stated, that *“Project planning should place equal emphasis on roadway improvements and TDM measures and pursue creative solutions to encourage both patrons and employees to use alternative, less-polluting transportation.”* (Certificate, p. 19)

MAPC requests that the Secretary require the Final EIR to include additional TDM measures, such as the following:

- subsidizing MBTA passes and other incentives to use bike share, rideshare, and shuttle services for office and retail tenants as well as hotel patrons;
- offering real-time transit and mobility information within buildings and at the Blue Line stations;
- developing a comprehensive car share network plan for the entire Project;
- providing unbundled parking from residential units;
- providing cash-out incentives for employees that do not utilize on-site parking facilities;
- offering flexible work hours and teleworking, and providing incentives in commercial tenant leases to encourage such practices; and
- promoting ridesharing through NuRide, the Commonwealth’s web-based trip planning and ridematching service that enables participants to earn rewards for taking “green” trips.

The FEIR should address how the TDM plan will have measurable goals and be enforced once the site reaches full build out, as well as when there are changes in ownership and operation.

Electric Vehicle (EV) Accommodation

The DEIR states that “for the parking that will also be provided in the near-term, the Proponent has committed to provide at least 2% of parking spaces with EV charging stations.” It is not clear what “near-term” parking refers to, or how many parking spaces this includes. This should be clarified in the Final EIR. While the Proponent has outlined a program accommodating EVs, MAPC encourages the Proponent to consider a 5% minimum for EV charging spaces, with another 10% make-ready wired as per the City of Boston’s EENF comment letter⁵. If there is rapid adoption of EVs, the Proponent should be open to increasing these percentages over the life of the build out. Massachusetts is party to a multistate Memorandum of Understanding for an action plan facilitating implementation of zero-emission vehicle (ZEV) programs. The goal is to ensure that there are 300,000 ZEVs on the roads in Massachusetts by 2025, which requires adequate infrastructure⁶. Large-scale projects such as Suffolk Downs should help us to meet this commitment.

⁵ Letter from BTDA and BPDA to BPDA dated February 21, 2018.

⁶ State Zero-Emission Vehicle Programs, Memorandum of Understanding, October 24, 2013. <https://www.zevstates.us/>

Collaboration for a Transportation Enhancement Program

MAPC supports the City of Revere's recommendation that a mechanism similar to the Kendall Square Transportation Enhancement Program (KSTEP) be explored and evaluated for this Project. The KSTEP creates a partnership that allows parties from the public and private sectors to work together on longer term transportation solutions in the context of evolving development.

It is important to note that the City of Revere's comment letter states, "*We would suggest that such a mechanism would be even more useful in this case because the Suffolk Downs redevelopment involves a larger site with a lengthier timeframe and – perhaps most importantly as compared to Kendall Square – it involves two municipalities and related complications of state jurisdiction.*" (January 19, 2018, p. 12)

MAPC would welcome the opportunity to be included should there be future discussions to consider forming a mechanism similar to the KSTEP for this Project.

Pedestrian/Bicycle Access

MAPC is pleased that the Proponent proposes the following enhancements for bicycles and pedestrians both onsite and offsite to improve local and regional connections:

- an on-site bicycle network with over 17,000 linear feet of on-street bike accommodations and over 13,000 linear feet of cycle tracks;
- a pedestrian network with several community paths, which will extend through the 40-acre open space system;
- a two-way cycle track along Winthrop Avenue from Washburn Avenue to North Shore Road;
- a new at-grade community path crossing of Route 1A at Tomasello Drive to the Chelsea Creek side;
- a new at-grade pedestrian crossing of Route 1A at Furlong Drive to the Chelsea Creek side;
- a community path connection to the proposed Walley Street bicycle facilities, which leads back to Bonito Square and the East Boston Greenway; and
- Exploring and designing an East Boston Greenway extension from Constitution Beach to Revere Beach.

The Proponent proposes to incorporate five Bluebike Stations, one adjacent to each of the Blue Line Stations and three within the interior of the larger site. Although Bluebikes do not currently operate in Revere, the Proponent is willing to include these in the Revere portion of the Project pending further discussion with the City of Revere and Bluebikes. The demand for Bluebikes will be monitored over time and the number of stations and bikes will be adjusted accordingly.

Additionally, most vehicular streets within the site plan will be designed to include bike lane provisions. In spite of these positive bicycle provisions, the FEIR should clearly show where and how bicycle services and racks will be accommodated in the public realm, at individual buildings, and at the two MBTA stations. The locations, number, and type of on-street and off-street bicycle provisions (e.g., indoor storage, outdoor racks, number of bicycles) should be detailed in the FEIR.

The Proponent should develop concepts to extend several regional trails from the Project site outward in four directions. Providing these trail connections will enhance the value of the project site significantly with direct connections to Revere Beach, Logan Airport, and the Chelsea River. The suggested regional trail extensions are as follows:

- Extend the East Boston Greenway Extension from its terminus through the Orient Heights Station area to the Suffolk Downs Station and the Project site.
- Study the feasibility of a trail/greenway from the Project site at Winthrop Avenue along or over Revere Beach Boulevard to Revere Beach (at Eliot Circle). Direct access to the beach via this connection could be a key selling point of this project as the distance is less than a half mile.

- Develop a trail/greenway over Route 1A from the Project site to the Chelsea River and future trail along an unused railroad R-O-W.
- Connect Belle Isle Marsh trails to the Project site via a new bridge over the Blue Line tracks.

As a final point, the Proponent should detail how the internal pedestrian and bicycle network will be separated from automobile traffic.

Environment

MAPC notes that the Project has been designed to meet MA stormwater treatment standards for new development and incorporates green infrastructure. Environmental improvements include daylighting a portion of Sales Creek, improved tree canopy, and an invasive species treatment plan.

A critical issue for this Project is the vulnerability of this location to the impacts of sea level rise and increased extreme precipitation events due to climate change. The EENF Certificate required further analysis to model impacts to the property and adjacent properties. As a result of this analysis, the Proponent has increased flood storage (Central Common and Parking Garages) and directed additional stormwater to Chelsea Creek. Their modeling indicates a further need for an additional tide gate and pumping capacity at Sales Creek. The additional pumping capacity would be associated with the DCR tidegate. It is not clear whether the Proponent currently has the right to put in an additional tidegate. The Proponent suggests that a regional district scale solution may be more appropriate. This raises the question of whether the Proponent will be responsible for protecting this new community, or whether this task will ultimately fall to government entities. The Proponent should clarify when their modeling finds an additional tidegate and pumping capacity is needed, based on likely year and flood stage. The FEIR should clarify whether the Proponent has the legal right and the intention to take responsibility for contributing to upgrading the tidegate and additional pumping capacity. If they do have that right, we hope the FEIR will indicate when and how the Proponent intends to contribute to these improvements; if they do not currently have that right, we hope the FEIR will suggest a specific mechanism to engage with other governmental entities to make sure the issue is addressed.

In addition to the need for the tidegate and pumping capacity, the Proponent also notes that their proposal will require DEP to issue a waiver to peak stormwater discharge rates. The Proponent should consider alternatives that lessen flooding impacts and stormwater discharge rates. Alternatives considered should include reduced impervious surfaces, elevation of buildings as an alternative to fill, additional daylighting of Sales Creek, as well as reduced development.

The DEIR does not comply with the following direction of the EENF Certificate: *“The DEIR should include a reduced development alternative that would reduce impervious surfaces, traffic generation, decrease development and fill in the floodplain and increase open space...The DEIR should evaluate alternative designs that avoid, minimize, and mitigate any impacts to LSCSF and the beneficial functions of the floodplain currently present on the project site.”* (Certificate, pp. 16-17) Table 1-27 shows no change in impacts to Land Alteration, Impervious Area, or Wetlands impacts.

Housing

MAPC is pleased that the DEIR has outlined various housing types including townhomes, apartments, condominiums, studios (smaller-sized and standard) as well as on-site affordable units and senior housing. In addition, MAPC notes that the updated development program in the DEIR includes more townhomes along Orient Heights and a stepped-down set of heights near Orient Heights and the Revere edge as well. These development changes will lessen the impact of massing on the abutting existing residential areas. MAPC recognizes that the residential and mixed use areas have been moved closer to the train stations, and interspersed with the commercial area along Main Street. This will provide better access to transit and parks and also establish an “18-hour” presence.

Boston and Revere are both part of the 15-city Metropolitan Mayors' Coalition that recently issued a joint statement committing to the construction of 185,000 total new housing units by 2030, along with a set of 10 principles and best practices to guide the commitment toward meaningful action (see <https://www.mapc.org/news/metro-boston-mayors-region-must-produce-185k-new-housing-units-to-keep-up-with-economic-population-growth>). The number of housing units proposed in both Boston and Revere as part of the Suffolk Downs redevelopment will greatly assist in meeting this commitment. However, the redevelopment does fall short on two of the principles established by the Coalition, being the commitments to affordable housing and to family housing.

Per the City of Boston's Inclusionary Housing Program, the Proponent has committed to 13% affordable housing on-site. In addition to the on-site affordable housing, the DEIR makes reference to the fact that conversion of the property to mixed use from the existing race track will require a payment to the Affordable Housing Trust Fund and also to the Jobs Fund. We commend the developer and the City of Boston for this affordable housing commitment.

We are disappointed, however, that there will apparently no affordable units and no family units (e.g., 3 BR or more) on the Revere side of the Project. This is likely to have a negative environmental impact, since market-rate tenants are more likely to own cars (or multiple cars) and are also more likely to travel more by car and to take transit less.

We recognize and support Revere's desire to expand commercial space, to create more jobs, and to expand its commercial tax base, especially in light of recent losses of major employers in the city. We further recognize that Revere's public school population has grown significantly in the current decade. Nonetheless, since the Suffolk Downs project is such a significant opportunity, we believe that at least some of the units should be affordable to lower and moderate-income households. This is especially true because fully half the households in Revere are cost-burdened (e.g., they pay more than 30% of their income for housing) and 25% of the households in Revere are severely cost-burdened (e.g., they pay more than 50% of their income for housing). Without affordable units, it will be very difficult for cost-burdened Revere households to find an affordable place to live at Suffolk Downs.

All that said, we are encouraged that the Proponent has agreed to work with the City of Revere long-term to address its housing needs, and we would like to see some detail added to this commitment in the FEIR. MAPC is also prepared to work closely with Revere on housing issues, including as part of the Master Planning process currently underway. Since we recognize the link between housing and school age population, we are also prepared to work with Revere in its pursuit of state resources to assist in public school development and modification to meet growing demand.

Master Plans

MAPC recognizes that the DEIR has acknowledged ongoing and recently completed planning efforts in the DEIR. These planning efforts include: MetroFuture, Imagine Boston 2030, Go Boston 2030 Vision and Action Plan, Boston Open Space Plan, and Revere Open Space and Recreation Plan (OSRP). MAPC notes that although Imagine Boston 2030 is a higher-level aspirational plan, the Project on the Boston side is generally consistent with the vision for Suffolk Downs. These consistencies include:

- a transit-oriented mixed-use development;
- strengthening of industrial uses along the Chelsea River;
- emphasis on flood protection and open space, including signature network of protective water-oriented green spaces that connect to Belle Isle Marsh;
- strengthened pedestrian, vehicular, and bike connections to East Boston and Downtown; and
- development planning that supports a district-wide resilience strategy.

The DEIR acknowledges that Revere has been developing a new OSRP, which is now complete. While the OSRP does not specifically reference the Project, the FEIR should identify potential open space links to areas outside of the boundaries of the Project site.

The FEIR should acknowledge that Revere is working with MAPC on a city-wide Master Plan. The Proponent should coordinate with Revere regarding how the proposed Project fits into the City's overall approach toward housing need and production; economic development; transportation; and open space as delineated in the Master Plan.

Revere is in the midst of writing its special permit pursuant to the Suffolk Downs Overlay District, which was adopted in March 2018. The FEIR needs to address how the proposed Project complies with the special permit and any conditions attached to that permit. MAPC recognizes this compliance was probably negotiated during the review process.

Urban Design

As per the DEIR, "Belle Isle Square" at the Suffolk Downs Blue Line Station has undergone a material redesign and expansion to include large plaza areas, retail pavilions, community gathering space, and circulation for intermodal transit and transfers. This redesign strengthens the multimodal connections to the station, enhances the sense of place, and improves the transit-orientation of the redevelopment.

The redesigned "Belle Isle Square" differentiates it from "Beachmont Square" and provides more variety and sense of place, which is unique for each of the two stations. The potential programming of each square also differentiates treatment of the Suffolk Downs Station and the Beachmont Station, with variation in the approach to retail, outdoor plaza space, and a proposed "innovation center" at Beachmont Station.

MAPC would like to point out that efforts to improve transit-orientation at the two stations and multi-modal connections does not stop at the property line. The Proponent should be required to develop improvements to extend the transit plazas to the stations and enhance transit connections.

Additional master plan refinements have strengthened buffering to the existing neighborhood on the southern edge with significant design changes to the Waldemar Avenue edge, including small scale homes and townhomes, completing the street, a small park, dense landscape buffer, and stepping down larger residential buildings to further transition to the taller building height in the new district.

MAPC notes that the improvements on the southernmost border of the Project did not extend west into the southwestern "tail" of the property on Route 1A. The same design techniques could be applied in this location to assist with transition to the neighborhood, including many of the same design techniques mentioned in the previous paragraph.

Respecting the surrounding context could be further strengthened by refining building height in the district. The building height strategy should continue to explore variations in the placement of height that would reinforce transit-orientation of the district and reduce height adjacent to existing neighborhoods. In particular, the 190 feet height in the southwestern "tail" fronting on Route 1A should be reduced. Building height in those areas could be relocated to other areas of the master plan. For example, heights at the center of the district, or near the transit stations could possibly be increased.

Vitality in the district is likely improved through the refined Retail Plan and integration of the open space network to create a clearer and more concentrated retail corridor that links the redefined transit plazas. The Proponent has also enhanced district vitality and pedestrian-friendliness by adding a new north-south internal street parallel to and between the Main Street Retail District and Tomasello Drive.

Construction Impacts

MAPC recognizes the Proponent has developed a draft Construction Management Plan for Phase 1 which is included in Appendix G of the DEIR. As previously requested in the EENF comment letter, the Proponent should provide information regarding the estimated number of truck trips, the proposed routes, duration, and trip frequency for when the Proponent will be adding fill within Land Subject to Coastal Storm Flowage (LSCSF). Given the large amount of fill needed for the buildout of the Project, the FEIR should also discuss the alternative sources of fill as well as any potential impact on the source area(s).