



January 23, 2020

Kathleen Theoharides, 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 Theoharides:

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 transit, bicycling, 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.

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 Draft Environmental Impact Report (DEIR) filing, the Proponent has reduced the overall parking supply, resulting in a proposed supply of structured parking of about 13,190 spaces plus approximately 630 on-street spaces, for a total of 13,820 spaces. The proposed parking program outlined in the Final Environmental Impact Report (FEIR) equates to a reduction of 1,430 spaces as compared to the DEIR. The Project, a long-term development that will be implemented in phases over a period of 15-20 years, is forecast to generate approximately 71,425 vehicle trips per day when fully complete.

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.

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

MAPC has reviewed the FEIR and is pleased the Proponent has responded to many of the concerns and questions outlined in our comment letter addressing the DEIR². In particular we applaud the Proponent for identifying a mitigation program for public transit, providing detailed information regarding project phasing, and specifying mitigation commitments within the context of project phasing. We also commend the Proponent for committing to monitor parking use as each phase is built out and submit appropriate recommendations to the cities of Boston and Revere for reducing parking. However, we do have remaining comments as they pertain to the Project's mitigation program and monitoring program for public transit.

Mitigation Program

The Proponent has increased the total amount of transportation-related mitigation funds to \$61 million. Specifically, \$41 million will be allocated for off-site traffic improvements and \$20 million will go towards Blue Line enhancements, Beachmont Station upgrades, Suffolk Downs Station reconstruction, and Better Bus improvements.

Table 1-2: *Master Plan Project Phasing*, Table 1-4: *Planned Off-Site Infrastructure and Improvements by Phase*, and Table 13-1: *Summary of Proposed Mitigation by Development Phase* all identify detailed information addressing project phasing coupled with the timing of mitigation. We respectfully request that these tables be included in the Section 61 Findings as part of the MassDOT and DCR Access Permits. Doing so will help better document the Proponent's mitigation commitments for this Project.

Monitoring Program for Public Transit

The Proponent has projected that the public transit mode share for the Project will be 29.7%³. In order to ensure the success of attaining this mode share, public transit needs to be monitored. MAPC notes that while the Proponent has outlined a monitoring program for the traffic impacts during the course of the Project, a similar monitoring program for public transit needs to be identified.

In addition, MAPC respectfully requests that the monitoring of public transit clearly distinguish between Blue Line (Beachmont and Suffolk Downs Stations), MBTA buses (e.g., Bus Route 119), and the shuttle (inner and outer routes). We note the Proponent has stated that they are "committing to various mitigation projects, services, and strategies to reduce single-occupant vehicle travel, with a heavy emphasis on encouraging transit use."⁴ In order to ensure robust public transit use, it is critical that public transportation be monitored at key stages of the Project, in a manner similar to what has been identified for traffic. With a monitoring program, the actual public transit usage can be determined and additional mitigation measures identified, if necessary.

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,



Marc D. Draisen
Executive Director

cc: Mayor Brian M. Arrigo, City of Revere
Robert O'Brien, City of Revere
Interim Commissioner Gregory T. Rooney, Boston Transportation Department
Tad Read, Boston Planning and Development Agency
David Mohler, MassDOT

² Dated January 18, 2019.

³ Table 6-5 Peak Period Mode Share Summary - 2040 Build with Improvements. Drive Alone 33.2%, Carpool/HOV 22.3%, Public Transit 29.7%, Walk 11.4%, and Bike 3.4%.

⁴ Pages 14-23a, 14-25a, 14-26a, 14-35a, 14-36a, 14-66a.