



Secretary Kathleen Theoharides  
Executive Office of Energy and Environmental Affairs  
Attn: Page Czepiga, Assistant MEPA Director  
100 Cambridge Street, Suite 900 (9<sup>th</sup> Floor)  
Boston, MA 02114

## Re: MyRWA Comments on Suffolk Downs Redevelopment FEIR

January 24, 2020

Dear Secretary Theoharides:

Thank you for the opportunity to comment on the largest single redevelopment project in the Mystic River watershed, which spans 21 municipalities from Reading through Revere. The Mystic River Watershed Association (MyRWA), was founded in 1972 to protect and restore the river, its tributaries, and watershed lands for the benefit of present and future generations.

MyRWA partners with multiple communities through our Mystic Greenways Initiative and Resilient Mystic Collaborative to restore and enhance riverfront parks and paths while helping watershed communities prepare for increased flooding, drought and heat. The Suffolk Downs redevelopment has an outstanding opportunity to both support and benefit from these regional efforts. Our comments reflect the FEIR and project implementation.

### Overall Analysis

Regulators required a high standard of analysis of projected 1% stormwater and coastal flooding in 2070. The analysis goes further than what we have seen in past developments and uses the best available scientific data and models. It led to some important insights that point to more cost-effective opportunities for flood management. We hope that public agencies are able to assist smaller developments with access to this quality of work. We also thank HYM for meeting with us twice and value the project improvements we saw over the course of this process.

As the expected project buildout spans 20 years during a time of rapid changes in climate science and transportation technologies we ask that the **permit require periodic updates in critical data and assumptions** (e.g., rate of sea level rise, temperature increases, parking needs) no less frequently than every five years, or when there is a significant change in the proposal. Our specific comments follow by chapter, with **recommendations in bold**.

### Urban Design

Given the scale of this development—larger than Tufts University's Medford campus—urban design decisions will play large roles within this development and for its host communities of East Boston and Revere. A robust landscape and building stock that provides environmental and quality of life benefits is hugely important. We commend the developer for enhancing Sales Creek and Horseshoe Pond, creating green streets ("green fingers") along portions of the street grid, increasing native

plantings and control of invasive species, reusing runoff for landscape irrigation, and redirecting stormwater discharge away from Sales Creek and Belle Isle Marsh. Our remaining comments follow:

### Connections to Belle Isle Marsh

We understand that the MBTA Blue Line lies in between the project site and Belle Isle Marsh, limiting opportunities for both pedestrian connections and opportunities for the marsh to migrate inland.

**We recommend providing clear signage and wayfinding through the Suffolk Downs and Beachmont Blue Line stations to link proposed pedestrian/bike pathways with those in the marsh.**

### Sustainability/Green Building

By pursuing a model of patient, neighborhood-level development, Suffolk Downs has the opportunity to set a new standard for cost-effective, carbon-neutral, climate-prepared development. We understand that the proponent needs flexibility for emissions performance due to expected technology and materials improvements anticipated over the next 30 years. However, considering that 80% of the development is in Boston, **we encourage HYM to commit to carbon neutrality by 2050, consistent with the City's goals.**

### Wetlands and Waterways

We commend the proponents for preserving and improving on-site wetland resource areas including the daylighting of Sales Creek, increasing native plantings and control of invasive species, removing impervious area in the Riverfront area and restoring disturbed or degraded areas closest to Bordering Vegetated Wetlands ("BVW") and Bank. We are also glad to see that the FEIR reduces the amount of impermeable surface by 14 acres, and adds 5.5 acres of Boston-owned or -controlled parkland.

During the DEIR review process, a diverse set of commenters requested the application of a customary 100-foot buffer zone, including us (MEPA comments C.022; C.024; C.027; C.033 referenced the buffer and attribute requests to DEP "and others" (C.027)). The FEIR Preferred Alternative maintains a minimum setback distance of 25-feet from Sales Creek (i.e. the Riverfront Area) for buildings and roadways.

Both Sales Creek and Belle Isle Marsh, are part of the Rumney Marshes ACEC that has been characterized by the U.S. Fish and Wildlife Service as "one of the most biologically significant estuaries in Massachusetts north of Boston." The area includes approximately 1,000 acres of highly productive saltmarsh, tidal flats, and shallow subtidal channels. We are not convinced that the current condition of the buffer zone should exempt the proponent from the customary 100-foot buffer zone, and ask that further work be done to **increase the buffer zone for Sales Creek beyond the proposed 25 feet** to improve and protect one of the last remnants of salt marsh habitat in Boston Harbor. We request that such an expanded buffer zone would receive permanent conservation restrictions, as being explored as part of the FEIR.

In light of the biological significance of Belle Isle Marsh and the potential impacts on the park area and the marsh, we strongly encourage that HYM form a productive partnership with the Friends of Belle Isle Marsh to achieve the protections that Belle Isle Marsh requires. We note that the Friends

of Belle Isle Marsh has articulated a specific need for the hydrology data created by this project and a desire for infrastructure that can better support education programs at the marsh.

### Transportation

HYM has proposed multiple investments in 21<sup>st</sup> century, multi-modal transportation to reduce greenhouse gas emissions and provide safe and reliable transportation. We are especially pleased to see proposed walking and biking connections to Belle Isle Marsh and Constitution Beach as well as a 20-foot-wide (as possible) community path between Constitution Beach and Revere Beach. We support the updated plan to incorporate a “shared parking concept; and inclusion of a requirement to track parking demand data which can allow the Proponent to reduce the construction of additional parking spaces as the development is constructed.” For example:

#### East Boston Greenway Extension

We commend the proponent’s commitment to design and construct the East Boston Greenway from Constitution Beach to the development over Bennington Street along Walley Street as well a feasibility study and preliminary design for a community path from the Walley/Bennington Street to Revere Beach. **We ask that HYM include community stakeholders in these design processes, particularly the Friends of the East Boston Greenway and Friends of Belle Isle Marsh.**

#### Ongoing Transportation Mitigation and Management

We are pleased to see that HYM is exploring the creation of a Transportation Management Agency (TMA) to manage proposed on-site and off-site shuttles in addition to its TDM measures. We want to reiterate how important this management agency will be and encourage collaboration with future TMA’s in the area and other regional entities. **It would be ideal if this entity were able to propose and fund ongoing capital and operational needs around sustainable transportation** (e.g., transit, walking and biking and car share/electric vehicles initiatives).

#### Active Transportation

We are pleased to see that the proponent has developed an at-grade crossing at the Tomasello Drive/Route 1A intersection to allow for bicycle and pedestrian access across Route 1A. This would link to existing public waterfront access to the Chelsea River north of the Logan Cargo Park site.

#### Transit Improvements

We are pleased to see a \$20 million transit mitigation payment that will go toward Blue Line enhancements, Beachmont Station upgrades, Suffolk Downs Station reconstruction and Better Bus improvements. This sets a model precedent for future development projects that will have a significant transportation impacts.

#### Parking

We commend the proponents on reducing the total number of parking spaces from 15,250 to 13,820 and for proposing a time-limited and metered fee structure for on-street parking. We understand that there is uncertainty as far as future commercial tenants and their employer base so **we would ask that parking ratios be reviewed thoroughly during the planning and design for**

**Phases 3 and 4** given the rapid pace of change in transportation technology and regional traffic levels and how well this site is served by existing transit.

## Climate Resilience

Given the size and location of this project, state regulators required a high standard of analysis regarding projected sea level rise and coastal flooding. We applaud HYM's willingness to make their analysis available to Revere and DCR for use in climate planning in the Sales Creek watershed. **We strongly support HYM's commitment to "returning to MEPA prior to implantation Phase 4R to reevaluate the project's climate change and adaptation study and proposed Full Build mitigation."**

This modeling and analysis led to several significant on- and off-site investments, including on-site stormwater retention, and regrading of the property to drain into Chelsea Creek instead of Sales Creek to lessen the risk of flooding nearby neighborhoods. In developing the FEIR, additional modeling required by CZM led to HYM's awareness of a relatively narrow flood pathway along Washburn Avenue seaward of the Beachmont MBTA Station. They have acquired land and are committed to building a two-to-three-foot high berm to prevent near-term coastal flooding of the T Station and inland neighborhoods.

Longer term, HYM has committed to funding the feasibility study of a significantly larger Bennington Street berm system that could manage coastal flooding and potentially allow the marsh to migrate inland. **We support and offer our help in optimizing the effectiveness and additional benefits of both the Washburn and regional coastal flood barriers.** We continue to hope that the cities of Boston, Revere and Chelsea, the MBTA, Mass CZM and local stakeholders such as the Friends of Belle Isle Marsh form a taskforce to design and implement a regional flood barrier that would also provide ecological and social benefits.

Also, although the project is unlikely to affect the adjacent Irving Oil Terminal on Chelsea Creek, we are concerned that a severe coastal storm could damage the fuel tanks and spill oil into Chelsea Creek and the Suffolk Downs site. HYM and its public and private neighbors have a strong interest in ensuring that the Irving Oil Terminal is prepared for the more extreme coastal storms predicted by climate change.

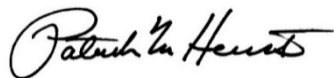
The project lifespan is predicted to last fifty years from full build out, or 2085. If sea level rise projections are higher than the 2100 intermediate projections modeled, the site could experience high tides six feet higher by then. We understand that the proposed finished floor elevation (FFE) for the portion of the project located in Boston ranges from 20.5 to 21.5 feet (Boston City Base), and the FFE in the Revere portion of the project is 18 to 18.5 feet BCB. The January and March 2018 Nor'easters, considered to be 1% coastal storms, reached 16 feet BCB. The proposed FFE elevations will almost certainly require expensive retrofits to prevent chronic saltwater flooding in the second half of this century. **Given the project site's susceptibility to coastal flooding, we continue to urge proponents to elevate finished floor elevations to 24 feet BCB through additional terracing between street level and their entrances.**

We are glad to see that residences are not proposed for the first floors, and we are glad to see that single family homes and townhouses will be designed to Passive House standards. **We encourage**

**HYM to consider Passive House standards for multi-family residences as well, as being constructed at the Concord Highlands affordable housing project in Cambridge.**

In closing, we are encouraged to see a development revitalize an underused site and connect communities across municipal borders and between Chelsea Creek and Boston Harbor. We look forward to a continued partnership with HYM and its host communities to create a thriving, climate-prepared, low-carbon, multi-income neighborhood. Please do not hesitate to contact us with questions or comments at (781) 316-3438 or [julie.wormser@mysticriver.org](mailto:julie.wormser@mysticriver.org).

Sincerely,

A handwritten signature in black ink that reads "Patrick Herron". The signature is written in a cursive, flowing style.

Patrick Herron  
Executive Director, Mystic River Watershed Association