

Exhibit E

1. Comment Letters from City Departments

MEMORANDUM

TO: Brian Golden, Director, Boston Parks and Recreation Commission
CC: Joyce Linehan, Chief of Policy, City of Boston
Austin Blackmon, Chief, Environment, Energy and Open Space Cabinet
Christopher Cook, Commissioner, Boston Parks and Recreation Department
Corey Zehngebot, Senior Urban Designer, Boston Redevelopment Authority
FR: Carrie Marsh, Executive Secretary, Boston Parks and Recreation Commission
DT: 103015
RE: Provision of Permanently Protected Open Space in Urban Renewal Areas

The update of the Urban Renewal Areas provides an opportunity to increase the inventory of public open space in Boston. *Housing a Changing City: Boston 2030* projects a population of 700,000 residents by 2030, and calls for 53,000 new housing units to accommodate that growth. The city will need to add another 625 acres of permanently protected public open space in order to meet projected growth and maintain its current ratio of 7.6 acres per 1000 residents, or 1300 new acres in order to offer resources commensurate with top U.S. cities.

Boston's projected growth will exacerbate existing disparities in the distribution of open space across the city. Some neighborhoods are significantly underserved, particularly by large open space suitable for active recreational uses. Many of the densest neighborhoods offer few opportunities for new open space, and are experiencing additional residential development, which increases the pressure on existing open spaces. Urban renewal tools should help meet the challenge to increase public open space in a mature, compact, and densely developed city.

The Urban Renewal Areas should prioritize the balance of growth with green space in neighborhoods throughout the city. The Boston Parks and Recreation Department (BPRD) makes the following recommendations for how to achieve this balance.

1. **Open Space and Recreation Plan 2015-2021.** The City's Open Space and Recreation Plan should be the foundation for open space provision in urban renewal areas, in order to ensure that parks are developed in underserved areas. In particular, several of the urban renewal areas correspond to high need priority areas for parks, including Charlestown (west of Rutherford Avenue), Washington Park (Grove Hall area), CBD/South Station (on the South Boston side), and the South End (east of Washington Street).
2. **Objectives.** The objectives of the urban renewal plans should include a goal to increase and improve the open space in the city, both through the provision of publicly owned and protected parks and playgrounds, and through the provision of meaningful private onsite open space that is restricted in perpetuity through conservation restrictions.

3. **Actions.** The actions of the urban renewal plans should specifically include the provision of parks, playgrounds and recreation spaces as qualifying public improvements to be created through clearance and redevelopment activities.
4. **Planning for Parks.** The plans for the urban renewal areas should proactively delineate where significant sized public parks, playgrounds and recreation spaces will be provided, meeting the areas of highest need. Passive plazas and pocket parks should be balanced with the provision of large scale open space suitable for recreation where feasible.
5. **Land Use Requirements.** The land use and building requirements in the urban renewal plans should include specific requirements and dimensions of open space. BPRD can help to define meaningful onsite open space that can serve the residents and users of a site.
6. **Zoning.** BPRD can help to create the appropriate dimensional requirements to be included in the urban renewal plans that will form the basis for zoning, in order to create a ratio that fits current needs.
7. **Property for Parks.** Property owned or acquired for urban renewal purposes should include land for park, playground and recreation purposes. Many of the City's significant parks were created through earlier urban renewal plans. This commitment to acquiring land for public open space should remain a priority of the renewed plans.
8. **Open Space Design.** Open space provided as a requirement in urban renewal areas should be suitably landscaped, recreationally significant and environmentally sustainable.
9. **Climate Change.** Heat island mitigation, storm water management, flood control and ground water recharge should all be considered in the design of open spaces.
10. **Developer's Obligations.** Open space should be included in the requirements for redevelopment in relationship to housing units, as the two are tied together.
11. **Standard Formula.** BPRD can help to create a standard formula for providing open space, such as a percentage of acreage set aside in an urban renewal area, a per unit calculation, a percent of total development costs, an impact fee, a special assessment district, incentives, exactions, mitigation for variances, etc.
12. **Perpetuity.** Open space that is created through an urban renewal plan should be permanently protected in perpetuity under Article 97 through a conservation restriction, or via transfer to the Parks Department, the Conservation Commission, or the State Department of Conservation and Recreation (DCR).

13. **Land Disposition Agreements.** LDAs should specifically require that open space be provided and should specify that it be permanently protected in perpetuity through conservation restrictions or transfer to an appropriate agency, so that it remains a public benefit even if the term of the agreement ends or the urban renewal plan area goes away.

By way of example, open spaces that were created in the South End Urban Renewal area are provided for in agreements that state that “the Property is to be used and maintained for open space purposes, including, but not limited to: community gardening, neighborhood related green space use, and landscaping, parkland and children’s play areas, and shall be kept open and green forever.”

It is unclear how this open space will be kept open and green forever. The protection is only valid for the length of the agreement or the term of the urban renewal area. Permanent and binding protection should be required for open space created through urban renewal.

14. **Parks vs. Public Realm.** The difference between open space and public realm improvements should be specified. Open space is different that streetscape improvements, waterfront infrastructure, transportation infrastructure or TIF/DIF agreements. The urban renewal plans should not consider them interchangeable – open space is open space.
15. **Percent for Parks.** The Park Plaza Urban Renewal Plan includes a 1% of total development costs to be allocated to the Boston Common and Public Garden. That is the only urban renewal area with a percent requirement for parks. BPRD advocates that all urban renewal areas should include 1% for parks to be provided for development on BRA owned land.
16. **Transfer of Parks to the Parks Department.** Open space has been created through urban renewal in the past. A number of these properties continue to be held by the BRA. They should all be transferred to BPRD so that they are protected in perpetuity.
17. **Chapter 121A.** All project reviews made through Chapter 121A should be required to provide for permanently protected open space, and also be required to be reviewed by the Parks Commission. There should be no exception to this review during the streamlined permitting and negotiations for long term tax abatement or stabilization agreements.



CITY OF BOSTON

THE ENVIRONMENT DEPARTMENT

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October 29, 2015

Mr. Brian Golden
Director
Boston Redevelopment Authority
One City Hall, Ninth Floor
Boston MA 02201

RE: Downtown Waterfront–Faneuil Hall Urban Renewal Plan

Dear Mr. Golden

The staff of the Boston Landmarks Commission (BLC) appreciates the opportunity to comment on the proposed extension of the Downtown Waterfront–Faneuil Hall Urban Renewal Plan.

Within this area is the historic Blackstone Block. The street network of this area is the oldest existing in Boston and likely one of the oldest of America's Colonial Era. Portions of the area are designated Landmarks. Additionally, the Boston Landmarks Commission reviews some other work in the area through a Memorandum of Agreement with the Boston Redevelopment Authority authorized through the 1964 Urban Renewal Plan. The Commissioners take great pride in the development of this particularly important and unusual part of Boston. The upcoming Connect Historic Boston project was reviewed with much positive comment for its potential to bring more attention and people to the heart of the Blackstone Block. The extension of the Urban Renewal Plan would allow the Commission to continue its shepherding of the Blackstone Block into Boston's future.

The staff and Commissioners of the Boston Landmarks Commission value their relationship with the Boston Redevelopment Authority and look forward to continuing the mutually supportive review process in the Blackstone Block.

Sincerely,

Elizabeth A. Stifel, AIA, LEED AP BD + C
Staff Architect
Boston Landmarks Commission