

EASTMAN/ELDER STREETS NEIGHBORHOOD ASSOCIATION
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September 21, 2015

Brian Golden, Director
Boston Redevelopment Authority
One City Hall Square
Boston, MA 02201-1007

Re: South Bay Town Center, 101 Allstate Road, Dorchester, Massachusetts

Dear Mr. Golden:

Thank you for the opportunity to comment on the proposed South Bay Town Center project. Two of our members, Joan Tighe and Susan Capachione, serve on the BRA's Impact Advisory Group (IAG) for the project. Our concerns center primarily on three aspects of the project: traffic impacts, density and environmental review.

1. Traffic Impacts

This proposed project will have a huge impact on traffic on Massachusetts Avenue as well as the safety of cyclists and pedestrians. With the influx of residents in the proposed 475 housing units as well as patrons of the new movie theatre, shops, and a new garage with 619 parking spaces, traffic woes will dramatically increase.

The problems with the traffic related to the current South Bay Center are legendary in our neighborhood. First, exiting the Center via All State Road during the day is often difficult, especially if you want to make a left hand turn on Mass Ave. The wait to make the turn can be two or three lights due to volume. A redesign of the timing of the traffic lights must be undertaken.

Even more egregious is the traffic control at the intersection of Mass Avenue, Shirley Street, and Newmarket Square. The City changed the traffic light pattern several years ago. It added right turn lane and light going north on Mass Avenue to Newmarket Square by the Newmarket Station. However, nothing was done to control traffic turning left at the same intersection. A high volume of cars turn left on Shirley Street heading over to Norfolk Avenue and Dudley Street. Consequently, cars on Mass Ave turning left jockey with cars heading south on Mass Avenue to either make the turn or continue going south while the light is green. The result is constant back-ups on both Mass Ave sides of the intersection. Also, drivers use the Mass Avenue entrance to the Metro Credit Union drive-through ATMS on the north side of the street to make left turns to avoid the backup, causing additional problems. These situations must be

addressed in a redesign of the intersection to better accommodate the cars, cyclists, and pedestrians.

We also share the concerns of our neighbors in the McCormick Civic Association about traffic impacts on Boston Street but they are in a better position to address them.

2. Density

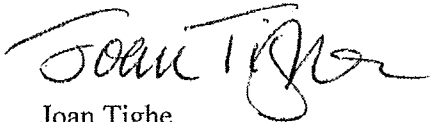
The developer is proposing 475 apartments in two residential buildings, to be marketed primarily to millennials and seniors. This is too dense. We support a reduction of the number of units to 350. Furthermore, we request that the developer:

- Make half of the units' rentals and half condominiums, as ownership will help encourage residents' investment in our community
- Place a deed restriction on the condominium units that requires that the owner live in the unit to avoid absentee owners renting to unvetted tenants.
- Increase the number of 3-bedroom units to make room for more families in the development.

3. Environmental Review

Lastly, we request that the developer be required to submit to and comply with the Massachusetts Environmental Policy Act (MEPA) review, without waiver of any MEPA requirements by any department, agency, commission, or other subsection of the City or state. We are especially concerned that the Project go through the rigors of MEPA review, because several commercial industries either exist or once conducted business using contaminants on one or more of the parcels to be used within the project.

Respectfully submitted,



Joan Tighe
For the Eastman/Elder Streets Neighborhood Association

CC: City Council President Bill Linehan
City Councilor Frank Baker
Representative Evandro Carvalho
Representative Nick Collins
Representative Dan Hunt
Senator Linda Dorcena-Forry

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By Hand Delivery

September 21, 2015

Raul Duverge
Boston Redevelopment Authority
One City Hall Plaza, 9th Floor
Boston, MA 02201

**RE: Comment Letter
South Bay Shopping Center – Expansion Proposal
8 Allstate Road, Dorchester, MA**

Dear Mr. Duverge,

The within correspondence is my comment to the Project Notification Form (“PNF”) filed by Edens for the proposed development/expansion of the South Bay Shopping Center in Dorchester. I live at 131 Boston Street and work at 123 Boston Street. I am also a member of the Impact Advisory Group.

I have attended public meetings where Edens has presented and discussed the proposed project on the site and have also read the PNF. As a matter of procedure, I note that Edens has not presented to the McCormack Civic Association membership (which membership resides in the area most affected by the proposed development) or at an IAG meeting since its submission of the PNF. Nevertheless, the period for public comment on the PNF expires today. I ask that you note my objection to having a comment period expire without the requiring Edens to present and discuss the details of the PNF to the community. I believe this is fundamentally unfair and will inevitably result in many community members being uninformed about the details of the PNF as well as their opportunity to comment on the plans detailed therein. I am aware that an IAG meeting is scheduled for September 29, 2015, and I request that the BRA reopen the comment period after the IAG meeting so as to permit interested residents the opportunity to submit their comments after the meeting.

As you may know, at the few meetings held by Edens prior to the PNF submission, it has been represented by Edens representatives, as well as by members of the BRA, that Edens’ proposal was in its beginning phases and that the concerns of the communities impacted by the proposal would be addressed. Unfortunately, a review of the PNF demonstrates that no modifications have been implemented based on the most significant concerns raised: namely, the roadways and overall scale of the project.

The proposed project clearly seeks to utilize Boston Street, via West Howell Street, as a major artery for ingress and egress to the new development (as well as the existing establishments located within the mall). While the BRA’s goal may be connectivity between the Polish Triangle and the

proposed development, the vast majority of the residents of the Polish Triangle, myself included, have expressed an objection to Boston Street being transformed into an access way. The congestion on Boston Street is already heavy and causes a burden to our community. Direct access by shoppers, renters, and moviegoers will act to increase the traffic and pollution in the Polish Triangle. I both live and work in the Polish Triangle because it is centrally located to highway entrances and Boston and because it provides the feel of a suburban neighborhood.

There is little doubt that the areas which Edens seeks to develop have been underutilized. However, the tradeoff does not need to be the loss of a neighborhood. Both the scale of the proposed development and its accessibility from Boston Street will adversely impact the Polish Triangle.

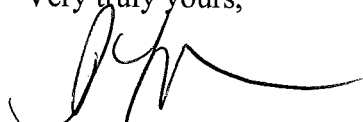
I am attaching hereto an alternative designation for the contemplated West Howell Street Extension and the continuation of West Howell Street where Building D and E intersect behind the South Bay Center (Panera Bread). This alternative is not ideal as it still permits ingress and egress into the proposed expansion from Boston Street for hotel guests and the occupants of Building D. It does, however, restrict the access of the retail customers and moviegoers. As you can see from the attached, access onto Boston Street from the West Howell Street Extension and from West Howell Street will be limited to Foley Fish, Building D and E occupants, and authorized commercial vehicles (e.g., trash removal services, emergency services, etc...). The retail customers and moviegoers, however, would not have access to the West Howell Street Extension or to West Howell Street from inside the mall and, thus, Boston Street would not be utilized by them for egress.

While not demonstrated on the attached, the same travel restriction could easily be implemented on Enterprise Street where it intersects with the "New Road". This would result in Building C retaining ingress and egress to Boston Street but would prohibit direct egress by the retail customers and moviegoers onto Boston Street.

Edens has repeatedly stated at the public hearings that it envisions the Boston Street access point to be predominately pedestrian. This representation has been made despite the direct vehicular access being presented in its plans. At a minimum, the restrictions discussed above would require mall customers to exit through the mall's existing access points and therefore limit the number of new vehicles on Boston Street. The bottom line here is that Edens must develop traffic patterns that will not burden the Polish Triangle.

In short, I oppose the present design of the proposed development and request that the BRA not grant its approval to the project. Edens, if it desires, can present plans to suit the concerns of residents in the existing neighborhoods that will be impacted by its development on the proposed site. The land upon which Edens proposes to develop is located in a desirable area of Dorchester and there should be little doubt that less intrusive development can be accomplished.

Very truly yours,



India L. Minchoff

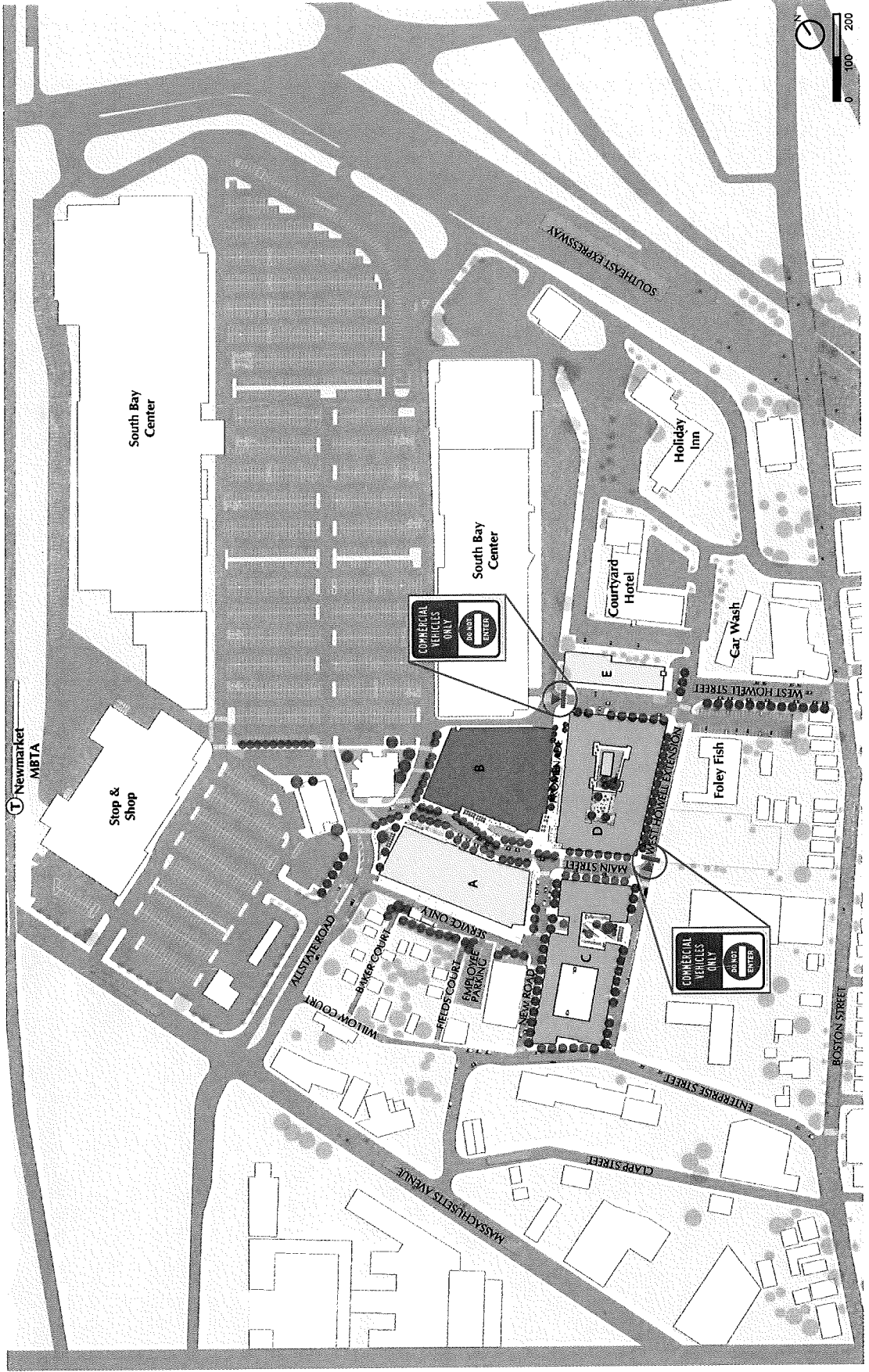


Figure 1-3
Project Site Plan
Source: ADD Inc, now with Stantec, 2015

September 16th, 2015

Dear Raul Duverge,

My name is Ramon Suero and I live at 26 Elder St, Dorchester MA. I am also a member of the Impact Advisory Group (IAG) for the South Bay Town Center Project. As a resident of the neighborhood and someone who has worked at all of the hotels in the neighborhood I know the neighborhood and the existing project well. The developer has been open to all my ideas and has held numerous meetings with the community.

This project will provide over 1,000 on-site parking spaces which is good because parking in the area can be tough. The project will also eliminate industrial truck traffic, which currently has over 100 trucks coming into the area each day. In addition, I suggested that the developer make sure the hotel has a shuttle to and from public transportation; which they have assured me they will have. Some other thoughts I had would be a shuttle to JFK and T cards for hotel employees so that it would cut down on traffic and parking. The existing hotels in the South Bay Center already do this.

I support this project because the developer has been thoughtful in incorporating the suggestions of myself and other IAG members. I support the approval of this project and thank you for allowing the community and I to have a voice.

Sincerely,

Ramon Suero

South Bay Town Center Impact Advisory Group

September 21, 2015

Boston Redevelopment Authority
One City Hall Square
Boston, MA 02201-1007

Re: South Bay Town Center, 101 Allstate Road, Dorchester, Massachusetts

Dear Sir or Madam:

The members of the Impact Advisory Group ("IAG") respectfully submit this comment letter in response to the Project Notification Form ("PNF") dated August 3, 2015, submitted by Allstate Road (Edens), LLC (the "Proponent"), for the mixed-use development proposed for 101 Allstate Road, Dorchester (the "Project" or "South Bay Town Center").

In preparing this comment letter, the IAG has carefully reviewed the PNF, documents the Proponent provided before the PNF, and other materials. Members of the IAG have had preliminary discussions on the proposed project with members of the community and elected officials but it should be noted there has only been one IAG community meeting as of the date of this letter which occurred prior to the release of the PNF. The IAG has also met to discuss the proposed project amongst themselves, and some members have attended the community meetings sponsored by Edens.

In short, the IAG agrees that the Proponent must address and rectify several areas of concern, as described in more detail in Section II below. For example, there is serious concern from members of the IAG and the community at large about the traffic flowing into and out of the South Bay Town Center. Traffic in the area is already a major issue in the neighborhood, especially on Boston Street. The traffic anticipated from the movie theatre, retail, and restaurant uses will likely make that major traffic problem worse.

In addition to rectifying each of the items in Section II below, the IAG agrees that the Proponent must also provide the mitigation package described in Section III below. To be clear, the Proponent must be required to correct the items in Section II and provide the mitigation package in Section III.

I. PROJECT DESCRIPTION

The Proponent proposes to build a mixed-use development on an approximately 9.9 acre site that is spread across 10 different parcels. As described in the PNF, the Project would include a 12 screen movie theatre, 475 dwelling units, 130 hotel rooms, and approximately 113,000 sf of retail and restaurant space.

The Project would also include a total of 1,066 parking spaces. 147 parking spaces would be located in surface lots and along the new roadways -- 70 spaces dedicated to the 130 room hotel, 32 spaces dedicated for parking for employees working in the retail stores, restaurants, movie theatre and hotel, and 45 spaces that would not be dedicated to any particular use.

The other 919 parking spaces would be in three different garages within the South Bay Town Center. 309 parking spaces will be located in two different garages in the residential buildings, and will be dedicated to the 475 proposed residential units – *i.e.* only parking spaces per residential unit. The final 610 parking spaces would be a third, stand alone garage (the “Commercial Garage”). These spaces would provide parking for the movie theatre, retail stores, and restaurants.

II. AREAS OF CONCERN

The IAG has identified the following areas of concern in the PNF for the South Bay Town Center, which the Proponent must address and rectify.

TRAFFIC / PARKING / SAFETY

1. The Proponent has not adequately addressed the traffic flow for vehicles.
For example:
 - a. The use of West Howell Street as a main entry point is hazardous and the plans do not address how the volume of potential vehicle flow will be handled without creating increased traffic bottlenecks throughout the entire neighborhood. The Proponent must adequately address how the volume of traffic flow will be handled on West Howell
 - b. The Boston Street offramp from 93 South can't handle the increased volume of traffic. The Proponent must work with the BRA to create a new roadway from the Boston Street offramp to the new Town Center without the utilization of Boston Street proper.
 - c. Enterprise and Clapp Streets are also not designed for two way traffic flow. This needs to be addressed to prohibit vehicle traffic exiting the Town Center from using these roads as major access points
 - d. The Proponent must provide improvements to the egress from Route 93 South. The egress must be redesigned to encourage vehicle traffic to use Route 93S as an outlet from the development and the South Bay Shopping Center. The current markings are inefficient, and the Proponent's own traffic study confirms that this egress is currently underutilized.
2. Because the Proponent has failed to adequately address the traffic flow, the IAG requests that the BRA conduct an additional traffic study to review the street light timing throughout the neighboring communities with a particular focus on Andrew Square, Edward Everett Square, the intersection of Massachusetts Avenue and Allstate Road, and along Columbia Road to Interstate 93. The IAG requests an independent recommendation on how the timing of lights and movement of traffic can be best accommodated with the increased traffic volume projected for the South Bay Town Center, along with the increased traffic volume projected for other major developments in the area, including but not limited to the Maxwell building on East Cottage and 235 Old Colony Avenue. To the extent additional traffic study is necessary to provide or supplement any of the projected traffic volume, the Proponent must provide those traffic studies.

3. The Proponent has also not adequately addressed pedestrian traffic flow. For example:
 - a. Enterprise and Clapp Streets lack proper sidewalks. Proper 6-foot sidewalks that meet the accessibility requirements by law must be provided by the Proponent.
 - b. The Proponent must evaluate and provide improvements to pedestrian access from Southampton Street.
 - c. The Proponent should evaluate vehicle traffic on the new "Main Street" and make this street more conducive to pedestrians and their safety.
 - d. The Proponent must replace and install lighting improvements along Boston Street to provide a safe walking path to and from the MBTA stations at night. In addition to providing safe lighting, the light structures must be of identical or better materials than those materials used for lighting along the new streets of Town Center. This is especially important for the increased hotel visitors who are travelling to and from Andrew Square.
 - e. The Proponent must provide the "Blue Light" system within its development, along Massachusetts Avenue to Newmarket Station, and along Southampton Street to Andrew Square Station.
 - f. The Proponent must commit to continuously trimming all trees that block lighting on Southampton Street and Boston Street – as well as all new streets within the South Bay Town Center. The Proponent must provide a written maintenance schedule and a contact for the community to report street lighting that is blocked by trees.
4. The Proponent must be required to increase security both on foot and in car. This includes visible security personnel or paid police details at the cinema for weekend, holiday and new releases so that traffic will utilize the Massachusetts Avenue, Southampton Street, and 93S outlets to exit the South Bay Town Center.
5. The Proponent's proposed parking ratio of less than 1 car per unit will likely exacerbate the parking problems in the neighborhood. Given the demonstrated recent issues with the MBTA, such a ratio likely may not meet the parking demand from the residential units. To off-set the parking impact:
 - a. The Proponent must enter into a binding and enforceable agreement to allow residents who live in the neighboring communities to park in the Commercial Garage during snow emergencies, at no cost to area residents.
 - b. Parking dedicated for the residential use within the South Bay Town Center must be available to all residents of the development, at no additional charge to them. The Proponent and its residential real estate partner (whom the Proponent has not yet identified) may not dedicate, assign, sell, transfer, or lease a particular parking space for particular residents. The Proponent and its residential real estate partner cannot impose any fee on top of monthly rent for a parking space. The Proponent and its residential real estate partner cannot sell or transfer a specific parking space to particular tenants.

- c. The Proponent must provide dedicated Zipcar and Hubway areas to encourage less vehicle traffic.
6. The Proponent must comply with all state and federal laws and guidelines, including but not limited to all fair housing laws and their design and construction provisions, as well as state guidelines. The IAG specifically requests that the Proponent provide written confirmation that it has complied with the laws and guidelines regarding accessibility (including parking spots).
7. The Proponent must commit in writing to work with the IAG and the community to address the traffic flow, as the review process for the South Bay Town Center continues.

DENSITY / SHADOWING

8. At 475 residential rental units, the residential component of the South Bay Town Center is too dense with no ownership. The Proponent must reevaluate the scope of the residential component, and provide a new proposal to allow for less massing in the area. The IAG agrees that 350 units would be more appropriate for this project coupled with a commitment that 50% are owner occupied units managed by a management company.
9. The IAG encourages the Proponent to make half of the units' rentals and half condominiums, as ownership will help encourage residents' investment in our community. The development can still be managed by one management company allowing for the same level of oversight.
10. There is concern regarding the shadowing impacts of Garage "A" on the neighborhood located behind the garage in the area of Fields and Willow Court. The Proponent must study the shadows created by the garage. If it creates an adverse impact on the directly abutting neighborhood, the Proponent must provide an alternate proposal with a lesser shadow impact. Additionally, the exterior of the garage should be aesthetically changed so that it is not a simple concrete structure especially at the back of the building facing into the neighborhood.
11. The Proponent must sign a binding written agreement prohibiting the leasing or construction of any billboards or commercial signage on Boston and Enterprise Streets. All commercia
12. The Proponent must provide the IAG with more detailed plans for the parcel just east of Building D known as the "finger" parcel as presented by Edens.

CONSTRUCTION REQUIREMENTS

13. The Proponent must commit to comply with the Boston Residence Jobs Policy which requires that on private development projects over 100,000 sq. ft., 50 % of workers are Boston residents, 25% are minorities and 10% are women.
14. The Proponent must commit to spend a minimum of 35% of pre-construction/construction costs or any agreed upon equivalent with businesses located

within a 5 mile radius of the Town Center. We encourage discussions with Newmarket Business Association to align these interests with the Proponent.

15. The Proponent must consult with the City and provide a thorough rodent abatement at the project site and within ___ mile radius from the construction site, throughout the whole construction process.
16. The Proponent must provide a community relations office located on site in order to address community concerns with the South Bay Shopping Center and the development, including but not limited to concerns that arise during any construction process. It is the expectation of the IAG this office will be permanent post construction.
17. The Proponent and its contractors are prohibited from parking construction vehicles on Boston Street during any phase of construction

III. MITIGATION PACKAGE

Because of the significant impacts the construction process and the development will create upon the community, in addition to addressing each of the issues above, the IAG requires the Proponent to provide the following mitigation package:

- The Proponent must pay an upfront lump sum donation to the community of either 1% of the estimated cost of construction or \$850,000, whichever is higher.
- In addition to the initial donation, the Proponent must provide an annual \$25,000 donation to the community each year thereafter.
- All donations shall be made to a charitable trust to be named and created. These donations will be utilized to make community improvements, maintain our local parks and historical sites and fund donations to art, youth, economic and educational programs as the trust do decides based on a rigorous application process.
- The IAG also asks the Proponent and its commercial tenants to implement internship opportunities for local high school/undergraduates to expose them about community development, architecture and construction as the project commences. This program would be similar to the "Building a Building" program created for the Brighton Aberdeen project.

* * *

The IAG thanks the Boston Redevelopment Authority and its staff in advance for giving the areas of concern and the mitigation package the IAG has recommended in this letter very serious consideration.

The IAG also reserves the right to raise additional areas of concern, and the right to revise the requested mitigation package, as the BRA's review of the South Bay Town Center continues. Accordingly, the IAG strongly recommends that the BRA hold the Proponent to all requirements of Article 80 and Article 80B of the Boston Zoning Code, without waiving any requirements. We look forward to our review of the DPIR document that the developer has committed to submit for this project and further discuss this development and its impact to the community.

Additionally, the IAG is hereby on record in requesting that the Proponent be required to submit to and comply with the Massachusetts Environmental Policy Act ("MEPA") review, without waiver of any MEPA requirements by any department, agency, commission, or other subsection of the City or state. The IAG is especially concerned that the Project go through the rigors of MEPA review, because several commercial industries either exist or once conducted business using contaminants on one or more of the parcels to be used within the project.

The undersigned members of the IAG, which constitute a majority of the group, are in agreement with the language of this document.

Very truly yours,

IAG for South Bay Town Center

Eileen Boyle, Columbia/Savin Hill Civic Association
Susan Capachione, Eastman/Elder Neighborhood Association
Neil Janulewicz, John W. McCormack Civic Association
Pattie McCormick, Andrew Square Civic Association
India Minchoff, John W. McCormack Civic Association
Desmond Rohan, Columbia/Savin Hill Civic Association
Millie Rooney, John W. McCormack Civic Association
Susan Sullivan, New Market Business Association
Earl Taylor, Dorchester Historical Society
Joan Tighe, Eastman/Elder Neighborhood Association
Linda Zablocki, Andrew Square Civic Association

cc: City Council President Bill Linehan
City Councilor Frank Baker
Representative Nick Collins
Representative Dan Hunt
Representative Evandro Carvalho
Senator Linda Dorcena-Forry