

COMMONWEALTH OF MASSACHUSETTS
THE GENERAL COURT

STATE HOUSE, BOSTON 02133-1053

BRA

January 10, 2018

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Director Brian Golden
Boston Planning & Development Agency
One City Hall Plaza, 9th Floor
Boston, MA 02201

Re: Suffolk Downs Project – 525 William F. McClellan Highway

Dear Director Golden:

We write to you with regards to the Phase 1 Development of Suffolk Downs. The current plan includes approximately 520,000 square feet of office space and corporate amenity space in a two building complex adjacent to the Suffolk Downs MBTA Blue Line Station. Suffolk Downs is a 162 acre lot that is the largest single development site in Boston, which also includes a parcel of land in Revere. Given the size, scope, and inevitable impact of the proposed development, it is imperative to have a robust, transparent, resident driven, community process. HYM Investments (HYM) has already commenced a strong community dialogue to solicit feedback by presenting its plans to the East Boston and Revere communities, meeting with abutters, and soliciting feedback from residents. We expect such efforts to continue throughout the duration of this process and to include bilingual outreach, particularly in Spanish,¹ to maximize resident engagement.

East Boston and Revere are diverse, blue-collar immigrant communities that are currently facing many challenges. Examples of these issues include scarce affordable housing, displacement of families, dislocation of small businesses, severe traffic congestion, a lack of both before-and after-school programming for youth, and the ever increasing threat of sea level rise and severe weather events due to climate change. We are hopeful that the development of Suffolk Downs will help address existing needs without creating new problems for the area. In this letter, we outline guiding principles and recommendations for Phase I and the development as a whole that would greatly benefit Suffolk Downs' host communities and help to ensure the overall success of this project.

As this area continues to develop and grow, transportation pressures are noticeably increasing. Residents specifically face challenges with public transit infrastructure, traffic congestion, and connectivity to the rest of Greater Boston. Connectivity is necessary to ensure the continued economic development of these communities and access to greater opportunity in the region. Presently, transportation options are stymied by the lack of service between the Blue and Red Line trains. A financial commitment supporting the funding of this project would not only increase access to the development, but also provide members of

¹ Over fifty percent of East Boston's population is Latino.

the community with a much needed service. The present limits to transportation infrastructure have resulted in high levels of congestion along densely populated Route 1A, making investments in improving the corridor a necessity. In addition, increased capacity to present transportation structures and alternative approaches, such as a water transportation system on Chelsea Creek, would assist in reducing local congestion. Additional consideration should be given to onsite parking, snow emergency parking, electric vehicle charging stations, and pedestrian infrastructure, including bike paths and permeable pavements, to ensure the host communities are not burdened by the development. As a transit-oriented development, a comprehensive transportation study that addresses accessibility, capacity and traffic will ensure the development remains a part of the East Boston and Revere communities.

The redevelopment of Suffolk Downs presents a unique economic opportunity for these communities, whether it is the addition of a flagship business such as Amazon or other commercial developments. Still, it is important that the project remains focused on the economic needs of the host communities. In that vein, we ask that the project make significant hiring efforts from East Boston and Revere both during and after the construction process. In addition, a firm commitment to work with local labor organizations, worker centers and other advocates would ensure that workers are treated with the respect and dignity they deserve. Further, the development should include significant space and opportunities for local small businesses and artists. East Boston and Revere remain among the most culturally and economically diverse communities in the Commonwealth and we encourage HYM to maintain this diversity through a concerted effort in their contractor and vendor selection.

The potential for economic development and job creation can provide needed vitality to the proposed site; however, it presents an absolute need for additional housing stock to ensure these communities remain affordable for current families. To achieve this, a comprehensive study evaluating the impact of 10,000 new housing units on the host communities and their schools is needed. Additionally, we hope to see a multi-million dollar early-phase investment in housing that includes affordable, workforce and senior units to reduce the overall impact on East Boston and Revere. We would also appreciate a concerted effort for building net-zero homes or passive homes,² and the use of solar energy on as many housing and commercial units as possible.

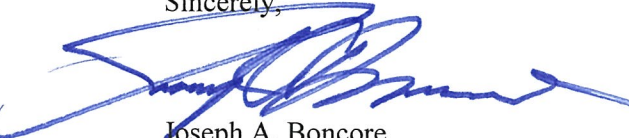
As coastal communities, East Boston and Revere are particularly susceptible to, and have already been impacted by, the effects of climate change. Bordered by shoreline and marshland, the project at Suffolk Downs must place resiliency at the forefront of the planning process. A climate ready project that addresses the impacts of climate change and provides protection to the existing shoreline and marshland will ensure the sustainability of the development. Additionally, East Boston and Revere have placed strong emphasis on the maintenance of green space in urban environments. Continued commitment to the beautification of these cities can be achieved through the reservation of at least 40 acres of dedicated open space at Suffolk Downs and a commitment to extend the East Boston Greenway through the property and to Revere.

² Homes that have the lowest possible energy use and ecological footprint


Akin to the East Boston Foundation,³ a community benefit fund should be established and operated by a third party nonprofit entity that would ensure balanced investment of mitigation funds to the various nonprofit and community interests in East Boston. A similar initiative should be pursued in Revere.

Though we remain optimistic about the potential for this project, we want to ensure that it remains an open and transparent process with adequate opportunity for review and community input. Regardless of whether Boston is chosen as Amazon's second headquarters, these are the principles that we would like to see with any large-scale development at Suffolk Downs. Thank you for your consideration of our comments on Phase I of this project. HYM has thus far been a valued partner in this project and we look forward to working with all stakeholders to ensure that what is built at Suffolk Downs benefits the community and residents for the short and long term.

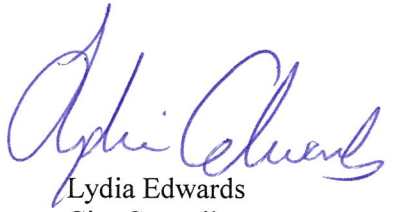
Sincerely,



Joseph A. Boncore
State Senator
First Suffolk and Middlesex



Adrian Madaro
State Representative
First Suffolk



Lydia Edwards
City Councilor
District One

³ A nonprofit organization that manages mitigation monies from Logan International Airport through grant awards to local organizations and initiatives

BOSTON

Martin J. Walsh, Mayor

February 2, 2018

Ms. Teresa Polhemus
Boston Planning and Development Agency
One City Hall Square
Boston, MA 02201

RE: Suffolk Downs EENF/EPNF; 525 McClellan Highway in East Boston

Dear Ms. Polhemus:

Boston Parks and Recreation Department (BPRD) has reviewed the *Expanded Environmental Notification Form and Expanded Project Notification Form* (EENF/EPNF) for the Suffolk Downs redevelopment located at 525 McClellan Highway in East Boston.

Belle Isle Marsh Reservation

The site is about 350' from the Belle Isle Marsh Reservation - a 241 acre open space that is part of the 1000 acre Rumney Marshes Area of Critical Environmental Concern (ACEC). Belle Isle Marsh is the last remaining salt marsh in Boston, and is the type of wetland that once lined the shore of Massachusetts Bay. Belle Isle Marsh, and much of the Rumney Marsh, is protected open space owned by the Department of Conservation and Recreation (DCR) and municipalities.

DCR notes that this marsh is critical habitat to many plants and wildlife that are rare to the metropolitan area. The salt marsh is also important for climate resiliency as it provides flood water storage that can reduce property damage.

Open Space

The Suffolk Downs site includes wetland resources such as Sales Creek which connects portions of the Revere watershed with the Belle Isle and Rumney Marshes. There is an existing pond on the site and other wetlands. The EENF/EPNF notes that these wetland resources will be preserved and integrated into the proposed open space system in the master plan.

The EENF/EPNF notes that the project will provide a network of 40 acres of publicly-accessible open space, which is 25 percent of the project site. This open space will include a 15 acre central common; a landscaped amphitheater; retail plazas, play areas; and dog parks.

The open space network will be passive use, designed for wetland protection, storm water management, climate resiliency and linear recreation. It will provide connections to the East Boston Greenway, Belle Isle Marsh, Constitution Beach and Revere Beach.



Boston Parks and Recreation Department

1010 Massachusetts Ave., Boston, MA 02118 / Tel.: 617-635-4505 / Fax: 617-635-3173

The plan does not show active recreational facilities to serve the needs of residents and other users. The project should provide public facilities for active recreation in addition to the passive use open space, and in compliment to the natural wetland resources at Belle Isle Marsh.

The proponent should clarify how it is counting the acreage, type and use of the open space. It would be helpful to provide a detailed chart that includes all open space that is proposed as mitigation for the development allowed under the PDA, as well as the proposed public benefits for development in landlocked tidelands under M.G.L. c.30 s.621.

The public realm of streets, sidewalks, retail plazas and parking areas is distinct from public parks, though it can be complimentary. This type of space should be counted separately from open space suitable for protection of natural resources, wetland areas, active recreation, etc.

Development Programs

The site is 161 acres total with 109 acres in the neighborhood of East Boston, and 52 acres in the City of Revere. The plan consists of a total of 16.5 million sf of development with 11 million sf in Boston, and 5.5 million sf in Revere. The project will have 15-20 year buildout. The plan proposes two development programs, with a range in the mix of commercial, residential, retail, and open space uses in order to allow flexibility in response to market forces over time.

The proponent is seeking a Planned Area Development (PDA) approval to allow for residential use and variances from existing zoning and to establish the mitigation of impacts and corresponding contributions to offset the development program.

The proposed residential use is the most important factor in terms of demand for and impact to open space. This would range from 7500 units under Program A, to 10,000 units under Program B. The EENF/EPNF does not provide an estimate of the number of residents or users. However, this could be roughly estimated to range from 7,500-30,000 residents under Program A, to 10,000-40,000 residents under Program B. The number of visitors and employees are unknown.

Needs Analysis

East Boston is underserved by public parks suitable for active recreation with a ratio of 1.31 acres per 1000 residents of parks, playgrounds and athletic fields. This is less than the city average of 3.24 acres per 1000 residents.¹ Mayor Walsh endorsed the Trust for Public Land's "Ten Minute Campaign" to ensure that all residents live within a 10 minute walk of a public park. The adjacent Orient Heights neighborhood is an area of particular need as identified by the Trust for Public Land² and the City's *Open Space and Recreation Plan*.³

Significant new development in East Boston is putting more pressure on existing public parks. The Suffolk Downs project will add 16.5 million sf of development to the neighborhood with 7500-10,000 households, which can be estimated to accommodate up to 40,000 new residents.

¹ 2011-2015 American Community Survey and the City of Boston GIS system

² Trust for Public Land, Park Score Evaluator: Boston

³ *Boston Open Space and Recreation Plan 2015-2021* Map 4: Open Space by Type: East Boston, page 229

The project should address how it is meeting this ratio and the public open space needs outlined in the City's Imagine Boston 2030, which includes the Open Space and Recreation Plan 2015-2021. The active recreation needs of this new population should be provided onsite or mitigated offsite so as not to impact already overburdened public parks.

Impact Assessment

This project will require new park land to meet the active recreational needs of the population that is enabled through the PDA. It is therefore critical to conduct a thorough impact assessment.

The proponent should provide the maximum projected population of residents and other users of the development under Options A and B.

The proponent should also detail how the open space acreage is being counted. Streets, sidewalks, plazas and parking should be counted as public realm, not conflated with park land.

This assessment will inform the demand for park land for active recreation use at the maximum buildout, compared to the amount of open space to be provided by the project, the resulting impacts to existing public open space, and the appropriate mitigation of this impact.

Public Benefits for Landlocked Tidelands

Suffolk Downs is subject to the *Landlocked Tidelands Legislation M.G.L. c.30 s.621*. This requires the Secretary of the Executive Office of Energy and Environmental Affairs (EOEEA) to approve the benefits that support the public's rights to access, use and enjoy tidelands.

Open space that is provided as mitigation for the PDA, as well as any amendments to the PDA, should correlate to the open space that is approved as a public benefit by the EOEEA.

Open space that is approved by the EOEEA as a public benefit should be permanently protected through conservation restrictions or transfer to public ownership.

Open Space Mitigation in the PDA

The proponent will seek approval of a Planned Area Development (PDA). A PDA will allow for approval of residential uses, and zoning relief for massing, density, and height. The intent of the PDA is to allow for flexibility in land use and timing to respond to market factors. The PDA will establish the mitigation for the impacts of the project created by this relief from zoning.

The mitigation established through the PDA should consider the impact of the maximum potential residential buildout (10,000 units) on open space. Residential users will have the greatest demand for park land, particularly for active recreational needs. The highest estimate of residents should therefore be used as the basis for mitigation.

Land that is provided for open space as mitigation of the PDA should be permanently protected through conservation restrictions or transfer to public ownership.

In the event that mitigation cannot be provided onsite, the equivalent amount of park land should be mitigated nearby. The proponent is encouraged to consider a contribution to the City of land suitable in size for a regional park with active recreational fields. This need could also be addressed by contributing to a fund for development of future public park land.

Protection in Perpetuity

The provision of permanently protected public open space is critical to the balanced development of this new neighborhood. The EENF/EPNF notes that the open space will be open to the public. It does not indicate if the open space will be publicly owned and protected in perpetuity.

Land that is provided as open space as mitigation of the PDA, or approved as a public benefit by the EOEEA should be permanently protected through conservation restrictions approved by the EOEEA or through transfer to public ownership. It may be privately managed.

A relevant example is the A Street Park in Fort Point which was created as a public benefit in exchange for development rights in the 100 Acre PDA. The ownership was then transferred to BPRD thereby ensuring permanent protection of the park land. A long term agreement was created for the proponents to maintain and improve the park.

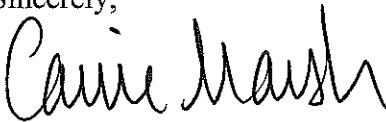
Open Space in Phase I

The Suffolk Downs project is proposed with a 15-20 year buildout.

The mitigation in the PDA should require that the open space system be fully implemented in the first phase of the project. This will establish the framework for development. It will ensure that the public benefit to residents of the development and to the neighborhood of East Boston is fully realized in the near term. And it will further ensure that the open space system is securely in place as amendments are potentially made to the PDA over time.

Thank you for your consideration of the above.

Sincerely,



Carrie Marsh, Executive Secretary
Boston Parks and Recreation Commission

cc: Christopher Cook, Commissioner, BPRD
Liza Meyer, Chief Landscape Architect, BPRD
Jon Greeley, Director of Development Review, BPDA
David Carlson, Deputy Director of Urban Design, BPDA
Tim Czerwienski, Project Manager, BPDA

**Boston Water and
Sewer Commission**



980 Harrison Avenue
Boston, MA 02119-2540
617-989-7000

January 4, 2018

Secretary Matthew A. Beaton
Executive Office of Energy and Environmental Affairs
Attn: MEPA Office
Page Czepiga EEA No. 15783
100 Cambridge Street, Suite 900
Boston MA 02114

And

Mr. Timothy Czerwienski, Project Manager
Boston Planning & Development Agency
One City Hall Square
Boston, MA 02201

Re: Suffolk Downs Redevelopment Project
East Boston and Revere

Dear Secretary Beaton and Mr. Czerwienski:

The Boston Water and Sewer Commission (Commission) has reviewed the Expanded Environmental Notification Form (EENF) and the Expanded Project Notification Form (EPNF) for the proposed redevelopment of Suffolk Downs Race Track located at 525 McClellan Highway in the East Boston. This letter provides the Commission's comments on the EENF/EPNF.

The project site is 161 acres of land located in East Boston and Revere. Approximately 109 acres of the site is in East Boston and approximately 52 acres is in Revere. The sites present use is a thoroughbred horse racing facility. Buildings on the site include a clubhouse, grandstand, horse barn and administration, maintenance and support buildings. The project proponents, HYM Investment Group, LLC and The McClellan Highway Development Company, LLC (HYM/MHDC) master plan proposes to develop the site in stages over the next 15 to 20 years. The overall master plan project consists of constructing approximately 11 million square feet (msf) of transit oriented mixed use facilities in Boston and 5.5 msf in Revere.

Phase I of the project is anticipated to be the home of Amazon's second headquarters. The second headquarters will include two 260,000 square foot (sf) buildings, 520 marked parking spaces in the existing paved parking lot, utility and other site improvements. The two buildings, are to be located at the southeast corner of the race track. Details on subsequent phases of



development were not defined in the EENF/EPNF, but are planned to be a combination of commercial, retail and residential buildings and public open space. As future phases of the project are advanced, HYM/MHDC coordinate with the Commission

Water to the site is provided by both the Commission and the City of Revere. The connections to the Commission water distribution system are an 8-inch water main in Waldemar Avenue and 12-inch water in the rear access road to Suffolk Downs at the end of Walley Street behind the MBTA station. The water main in Waldemar Avenue is served by the Commission's northern high pressure zone and serves the grandstand and utility building. The water main in Walley Street is served by the Commission's northern low pressure zone and provides water to the horse barn area.

Sewer and drain service from the site discharges to the Commission's sewers at two locations. The grandstands and other utility buildings discharge to a 12-inch sewer in Waldemar Avenue through a private 12-inch sewer and pump station. A private gravity combined sewer collects sewerage and surface drainage from the barn area and flows to a retention pond. Flows from the retention pond are pumped to the Commission's wastewater system through a private force main that connects to a manhole at the end of Wally Street behind the MBTA station. A separate private storm drainage system collects water from roofs in the horse barn area and discharges to Sales Creak near the southwest corner of the barn area.

The EENF/ EPNF states that water demand for the proposed project, for all phases, will be 2.73 million gallons per day (mgpd) and wastewater generation will be approximately 2.48 mgpd

The Commission has the following comments regarding the proposed project as they relate to Commission facilities and the portion of the site in the City of Boston:

General

1. Prior to demolition of any buildings, all water, sewer and storm drain connections to the buildings must be cut and capped at the main pipe in accordance with the Commission's requirements. The proponent must then complete a Termination Verification Approval Form for a Demolition Permit, available from the Commission and submit the completed form to the City of Boston's Inspectional Services Department before a demolition permit will be issued.
2. All new or relocated water mains, sewers and storm drains must be designed and constructed at HYM/MHDC's expense. They must be designed and constructed in conformance with the Commission's design standards, Water Distribution System and Sewer Use Regulations, and Requirements for Site Plans. To assure compliance with the Commission's requirements, the proponent must submit a site plan and a General Service Application to the Commission's Engineering Customer Service Department for review



and approval when the design of the new water and wastewater systems and the proposed service connections to those systems are 50 percent complete. The site plan should include the locations of new, relocated and existing water mains, sewers and drains which serve the site, proposed service connections as well as water meter locations.

3. The Department of Environmental Protection (DEP), in cooperation with the Massachusetts Water Resources Authority and its member communities, is implementing a coordinated approach to flow control in the MWRA regional wastewater system, particularly the removal of extraneous clean water (e.g., infiltration/inflow (I/I)) in the system. In April of 2014, the Massachusetts DEP promulgated new regulations regarding wastewater. The Commission has a National Pollutant Discharge Elimination System (NPDES) Permit for its combined sewer overflows and is subject to these new regulations [314 CMR 12.00, section 12.04(2)(d)]. This section requires all new sewer connections with design flows exceeding 15,000 gpd to mitigate the impacts of the development by removing four gallons of infiltration and inflow (I/I) for each new gallon of wastewater flow. In this regard, any new connection or expansion of an existing connection that exceeds 15,000 gallons per day of wastewater shall assist in the I/I reduction effort to ensure that the additional wastewater flows are offset by the removal of I/I. Currently, a minimum ratio of 4:1 for I/I removal to new wastewater flow added is used. The Commission supports the policy, and will require proponent to develop a consistent inflow reduction plan. The 4:1 requirement should be addressed at least 90 days prior to activation of water service and will be based on the estimated sewage generation provided on the project site plan.
4. The design of the project should comply with the City of Boston's Complete Streets Initiative, which requires incorporation of "green infrastructure" into street designs. Green infrastructure includes green spaces, such as trees, shrubs, grasses and other landscape plantings, as well as rain gardens and vegetative swales, infiltration basins, and paving materials and permeable surfaces. The proponent must develop a maintenance plan for the proposed green infrastructure. For more information on the Complete Streets Initiative see the City's website at <http://bostoncompletestreets.org/>.
5. For any proposed masonry repair and cleaning HYM/MHDC will be required to obtain from the Boston Air Pollution Control Commission a permit for Abrasive Blasting or Chemical Cleaning. In accordance with this permit HYM/MHDC will be required to provide a detailed description as to how chemical mist and run-off will be contained and either treated before discharge to the sewer or drainage system or collected and disposed of lawfully off site. A copy of the description and any related site plans must be provided to the Commission's Engineering Customer Service Department for review before masonry repair and cleaning commences. HYM/MHDC is advised that the Commission may impose additional conditions and requirements before permitting the discharge of the treated wash water to enter the sewer or drainage system.



6. The Commission will require HYM/MHDC to undertake all necessary precautions to prevent damage or disruption of the existing active water and sewer lines on, or adjacent to, the project site during construction. As a condition of the site plan approval, the Commission will require HYM/MHDC to inspect the existing sewer lines by CCTV after site construction is complete, to confirm that the lines were not damaged from construction activity.
7. It is HYM/MHDC's responsibility to evaluate the capacity of the water, sewer and storm drain systems serving the project site to determine if the systems are adequate to meet future project demands. With the site plan HYM/MHDC must include a detailed capacity analysis for the water, sewer and storm drain systems serving the project site, as well as an analysis of the impacts the proposed project will have on the Commission's water, sewer and storm drainage systems.
8. Activities within the proposed Facility may have Standard Industrial (SIC) Codes that the Environmental Protection Agency (EPA) has designated as requiring a Multi-Sector General Stormwater Permit for Industrial Facilities (MSGP). The project proponent or owner of the facility is responsible for determining whether a MSGP is required. If a MSGP is required the project proponent or owner is responsible for submitting to EPA a Notice of Intent (NOI) for coverage under the MSGP, and for submitting to the Commission a copy of the NOI and Pollution Prevention Plan prepared pursuant to the NOI. If the MSGP designated SIC Codes apply to the project and the project obtains "No-Exposure" Certification from EPA for the activities, a copy of the No-Exposure Certification must be provided to the Commission.

Water

1. HYM/MHDC must provide separate estimates of peak and continuous maximum water demand for residential, commercial, industrial, irrigation of landscaped areas, and air-conditioning make-up water for the project with the site plan. Estimates should be based on full-site build-out of the proposed project. HYM/MHDC should also provide the methodology used to estimate water demand for the proposed project.
2. If HYM/MHDC proposes interconnections between the Commission's and City of Revere's water distribution system, the Commission will require HYM/MHDC to install backflow prevention devices at all connections to the Commission's water distribution system. Any interconnections must be coordinated with the Commission and the City of Revere.
3. The Commission supports HYM/MHDC commitment to explore opportunities for implementing water conservation measures in addition to those required by the State Plumbing Code. In particular HYM/MHDC should consider outdoor landscaping which requires minimal use of water to maintain. If HYM/MHDC plans to install in-ground



sprinkler systems, the Commission recommends that timers, soil moisture indicators and rainfall sensors be installed. The use of sensor-operated faucets and toilets in common areas of buildings should be considered.

4. HYM/MHDC is required to obtain a Hydrant Permit for use of any hydrant during the construction phase of this project. The water used from the hydrant must be metered. HYM/MHDC should contact the Commission's Meter Department for information on and to obtain a Hydrant Permit.
5. The Commission is utilizing a Fixed Radio Meter Reading System to obtain water meter readings. For new water meters, the Commission will provide a Meter Transmitter Unit (MTU) and connect the device to the meter. For information regarding the installation of MTUs, HYM/MHDC should contact the Commission's Meter Department.

Sewage / Drainage

1. The project's plan must show the sewer system for the development that will be installed, the plan must show size, location and connections to the Commission's systems. If HYM/MHDC proposes to discharge sewerage from the Revere portion of the project development to the Commission's wastewater collection system, this must be indicated on the development plan and coordinated with the Commission and the City of Revere.
2. The existing drainage system discharges to Commission storm drains in Waldermer Avenue and Sales Creek. The DCR has a NPDES permit for the drainage system that discharges to Sales Creek. The proposed storm drains for Phase I at the northern portion of the site appear to connect into the DCR's drainage system. HYM/MHDC must coordinate the connection with the DCR.
3. In conjunction with the Site Plan and the General Service Application HYM/MHDC will be required to submit a Stormwater Pollution Prevention Plan. The plan must:
 - Identify specific best management measures for controlling erosion and preventing the discharge of sediment, contaminated stormwater or construction debris to the Commission's drainage system when construction is underway.
 - Include a site map which shows, at a minimum, existing drainage patterns and areas used for storage or treatment of contaminated soils, groundwater or stormwater, and the location of major control structures or treatment structures to be utilized during the construction.
 - Specifically identify how the project will comply with the Department of Environmental Protection's Performance Standards for Stormwater Management both during construction and after construction is complete.



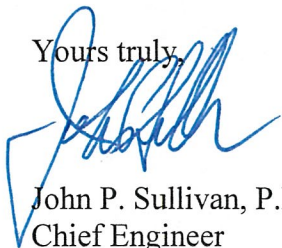
4. Developers of projects involving disturbances of land of one acre or more will be required to obtain an NPDES General Permit for Construction from the Environmental Protection Agency and the Massachusetts Department of Environmental Protection. HYM/MHDC is responsible for determining if such a permit is required and for obtaining the permit. If such a permit is required, it is required that a copy of the permit and any pollution prevention plan prepared pursuant to the permit be provided to the Commission's Engineering Services Department, prior to the commencement of construction. The pollution prevention plan submitted pursuant to a NPDES Permit may be submitted in place of the pollution prevention plan required by the Commission provided the Plan addresses the same components identified in item 3 above.
5. The Commission supports HYM/MHDC commitment to protect stormwater quality. HYM/MHDC should as part of the stormwater management plan consider minimizing sanding and the use of deicing chemicals, pesticides, and fertilizers. Structural components of the plan should include the feasibility of constructing green infrastructure and BMP's designed to reduce the nutrient loadings and peak discharge rates to receiving waters.
6. The discharge of dewatering drainage to a sanitary sewer is prohibited by the Commission. HYM/MHDC is advised that the discharge of any dewatering drainage to the storm drainage system requires a Drainage Discharge Permit from the Commission. If the dewatering drainage is contaminated with petroleum products HYM/MHDC will be required to obtain a Remediation General Permit from the Environmental Protection Agency (EPA) for the discharge.
7. HYM/MHDC must fully investigate methods for retaining stormwater on-site before the Commission will consider a request to discharge stormwater to the Commission's system. The site plan should indicate how storm drainage from roof drains will be handled and the feasibility of retaining their stormwater discharge on-site. Under no circumstances will stormwater be allowed to discharge to a sanitary sewer.
8. The Massachusetts Department of Environmental Protection (MassDEP) established Stormwater Management Standards. The standards address water quality, water quantity and recharge. In addition to Commission standards, HYM/MHDC will be required to meet MassDEP Stormwater Management Standards.
9. Sanitary sewage must be kept separate from stormwater and separate sanitary sewer and storm drain service connections must be provided. The Commission requires that existing stormwater and sanitary sewer service connections, which are to be re-used by the proposed project, be dye tested to confirm they are connected to the appropriate system.



10. The Commission requests that HYM/MHDC install a permanent casting stating “Don’t Dump: Drains to Boston Harbor” next to any catch basin created or modified as part of this project. HYM/MHDC should contact the Commission’s Operations Division for information regarding the purchase of the castings.
11. If a cafeteria or food service facility is built as part of this project, grease traps will be required in accordance with the Commission’s Sewer Use Regulations. HYM/MHDC is advised to consult with the Commission’s Operations Department with regards to grease traps.
12. The enclosed floors of a parking garage must drain through oil separators into the sewer system in accordance with the Commission’s Sewer Use Regulations. The Commission’s Requirements for Site Plans, available by contacting the Engineering Services Department, include requirements for separators.
13. The Commission requires installation of particle separators on all new parking lots greater than 7,500 square feet in size. If it is determined that it is not possible to infiltrate all runoff from the new parking lot, the Commission will require the installation of a particle separator or a standard Type 5 catch basin with an outlet tee for the parking lot. Specifications for particle separators are provided in the Commission’s requirements for Site Plans.

Thank you for the opportunity to comment on this project.

Yours truly,



John P. Sullivan, P.E.
Chief Engineer

JPS/ra

cc: T. O’Brien, MHDC
M. Connolly, MWRA
M. Zlody, BED
M. Nelson, BWSC
P. Larocque, BWSC



Are you on board?

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January 30, 2018

Director Brian Golden
Attn: Tim Czerwienski, Project Manager
Boston Planning and Development Agency
One City Hall Square
Boston, MA 02201

via email to tim.czerwienski@boston.gov

Re: Suffolk Downs Redevelopment, EPNF

Dear Director Golden,

On behalf of Boston Harbor Now, thank you for the opportunity to comment on the Expanded Project Notification Form (EPNF) for the Suffolk Downs Redevelopment project submitted by McClellan Highway Development Company LLC (McClellan) in November of 2017.

After reviewing the EPNF and attending the December 19, 2017 public meeting, our comments follow.

Project description

As presented in the EPNF, this proposal is for the redevelopment of the existing Suffolk Downs horse racing facility located in East Boston and Revere. The site is approximately 161 acres extending over two municipalities--109 acres in Boston and 52 acres in Revere.

As proposed, the Suffolk Downs Redevelopment Master Plan Project will include 16.5 million SF of mixed-used development; approximately 11 million square feet will be in the City of Boston and 5.5 million square feet in Revere. The entire redevelopment will take 15 to 20 years to complete.

Phase 1 Waiver

MEPA reviews require State agencies to evaluate the environmental consequences of permitting a development project and to require all feasible measures to be taken to avoid, minimize, and mitigate potential damage to the environment. Under 301 CMR 11.11, the Secretary may waive any provision or requirement of the MEPA regulations and may impose appropriate and relevant conditions or restrictions, provided that he finds that strict compliance with the rule or requirement would not avoid or minimize

damage to the environment. The proponent has requested a Phase 1 waiver for a limited portion of the site, located in East Boston. Phase 1 would include:

- 520,000SF of office space,
- A new internal access road,
- Open space improvements, and
- 520 structured parking spaces.

We understand the proponent's need to expedite the process in response to Amazon's search for new headquarters and the site's inclusion in, the recently published, shortlist of potential sites. Assuming that the waiver has the support of the City of Boston and the Impact Advisory Group for this project, Boston Harbor Now does not oppose McClellan's request for a Phase 1 waiver. Our concern, expressed in the following comments, focus on the remaining sections of the Master Plan.

The Suffolk Downs Redevelopment is a significant proposal with some fluid and yet-to-be-designed portions. The project will require extensive collaboration between City and State agencies, effective communication between two different municipalities, and a lengthy construction period. A Draft Environmental Impact Report (DEIR) for the remaining acres of the redevelopment is an absolute necessity for a project of this magnitude. We look forward to reviewing the proponent's DEIR at a future time.

A portion of Phase 1 is located within landlocked tidelands that are exempt from Chapter 91 licensing obligations. The Secretary may, however, require a public benefits determination for the proposed Phase 1 section of the project. As proponents develop the DEIR, we ask that particular attention is given to project impacts on abutters and surrounding communities, the proposed on-site community activities, and the public benefits offered as part of the redevelopment.

Environmental Protection and Preservation

According to the EPNF, the Suffolk Downs site contains 8 acres of wetland area. The Rumney Marshes Area of Critical Environmental Concern (ACEC) is part of the 8-acre wetland area and runs through a portion of the Suffolk Downs redevelopment site.

ACECs are areas that receive special recognition because of the significance of the natural and cultural resources they provide. Rumney Marsh was designated by the state as an ACEC in 1988 to preserve its environmental value as one of the most biologically significant salt marshes within and north of Boston. We commend the proponent for recognizing the importance of the area both in the EPNF and at public meetings.

One of our predecessor organizations (The Boston Harbor Association) worked closely with the Saugus River Watershed Council to educate the community and advance the long-term objectives of the Rumney Marsh ACEC designation¹. Section 4.4.6 of the EPNF points to the Marsh as a "heavily disturbed" area due to previous onsite activities. We understand the history of activities on the site may have heavily disturbed the natural habitat. These salt marshes are still vitally important to the surrounding areas, partially due to their capacity to provide flood water storage and prevent flood damage. Boston Harbor Now is particularly interested in understanding the proponent's mitigation plans to address the existing disturbances and restore portions of this environmentally valuable natural resource.

¹ <http://www.mass.gov/eea/docs/dcr/stewardship/acec/rumneymarsh.pdf>

Finally, according to the supplemental information, the Phase 1 project will add an estimated 19,000 cubic yard volume of fill within Land Subject to Coastal Storm Flowage (LSCSF). Although the proponent confirms there are no plans to alter existing wetland areas, the grading plan indicates the use of fill to increase site grade near the infield pond and at the edge of existing wetland areas. Future filings should focus on impacts to the wetland areas resulting from fill on abutting resource areas and the effects associated with redirecting storm flooding.

Public Access and Transportation

Recognizing that this project is being expedited due to its role in Boston's bid for the second Amazon headquarters, we anticipated a plan that more closely aligned with the Boston proposal. The City's proposal included a water transportation component that is not mentioned in the EPNF. For future ferry service to be a viable option for the site, there must be meaningful connectivity to and across Route 1 at the southwest corner of the site included in the plan. The final plan should include a passenger ferry viability study that considers travel times and travel time savings from Downtown Boston and North Station, a feasible location and design for a ferry dock proximate to the site, and vessel designs that can be used with the Andrew McCardle and Chelsea Street bridges.

Currently, the Phase 1 section of the project is proximate to the Suffolk Downs T station but it is not near an existing bike path/network. The nearest bike and pedestrian pathway is the East Boston Greenway that currently terminates near the Orient Heights T station. We are excited to hear that the proponent plans to connect the East Boston Greenway to Revere Beach. We strongly support efforts to incorporate several modes of transportation to and from the redevelopment site. Extending the existing East Boston Greenway will provide both the site and the surrounding communities with improved access and recreational benefits.

As presented in the EPNF, there will be several new east-west pedestrian pathways that cut across the site to connect Revere and Orient Heights. We applaud efforts to improve walkability across the site and encourage the proponent to explore additional north-south connections across the site.

A detailed mitigation commitment timeline that addresses the proponent's transportation contributions would be a helpful addition to the master plan documents.

Climate Change

We were glad to read that the proponent understands the vulnerability of the Suffolk Downs redevelopment site to flooding. We see this project proposal as an excellent opportunity to build an exemplary climate resilient project that creates on-site as well as district-wide resiliency that will also benefit the surrounding communities. We strongly urge the project proponent to consider district-wide resiliency approaches as part of its Master Plan.

As completed by the proponent, the Boston Climate Change Resiliency and Preparedness Checklist confirms that the project site is within the FEMA 100-year Flood Zone AE with a Boston City base site elevation ranging from 14-22 (the lowest point on the property is currently 14 inches at the Beachmont station in the Revere section of the project). As presented in the EPNF and at public hearings, the proponent plans to elevate portions of the site to the Boston Planning and Development Agency-recommended standard of 40-inches above the 100-year FEMA flood elevation and to create an opportunity for the community to shelter in place. We applaud this initiative.

The proponent's responses to the Resiliency Checklist also indicated that the frequency of storms, the need for temporary flood barriers, the resiliency of critical building systems, flood proof elevations, and

first floor elevations are yet-to-be-determined or have not been analyzed. Site and building design should consider the possibility that today's 1% storm could have a frequency of 10% by mid-century, and that chronic flooding associated with monthly and seasonal high tides will become more and more prevalent during the latter half of the century. We strongly recommend the proponents evaluate the combined impacts of both nuisance flooding and storm scenarios as well as increased intensity of super storms, nor'easters, and hurricane events that was suggested by the Climate Ready Boston/Boston Research Advisory Group report.

We also note that the Boston Research Advisory Group's projections for the Climate Ready Boston project indicated that that sea level rise may completely submerge the Bell Isle Marsh over time, substantially reducing the buffering capacity of this natural resource. The resilience plan for the Suffolk Downs site should consider this possibility.

During a recent site visit, our staff inquired about coastal flooding during winter storm Grayson. The development team confirmed that the tide gates along Bennington Street were vital in preventing storm surge and coastal flood waters from entering the Belle Isle Square section of the property. We note that the tide gates affecting the redevelopment project are operated and managed by the Department of Conservation and Recreation (DCR). Climate change resiliency plans explored as part of the Master Plan should consider a program that supports DCR's tide gate operations.

Finally, it is clear there will be a significant gap of time between the completion of Phase 1 and full buildout of the Suffolk Downs redevelopment. It is essential that Phase 1 is well-designed, with the public amenities, resilient design standards, and multimodal connections that will make it a great place and destination on its own.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Jill Valdes Horwood". The signature is fluid and cursive, with a large initial "J" and "V".

Jill Valdes Horwood
Director of Policy



January 25, 2018

Mayor Brian Arrigo
ATTN: Robert O'Brien, Director of Economic Development
City of Revere
281 Broadway
Revere, MA 02151

Secretary Matthew Beaton
ATTN: Page Czepiga, MEPA Analyst
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114

Director Brian Golden
ATTN: Tim Czerwienski, Project Manager
Boston Planning and Development Agency
One City Hall, Ninth Floor
Boston, MA 02201

RE: WalkBoston comments on Suffolk Downs redevelopment (EEA No. 15783)

Dear Mayor Arrigo, Secretary Beaton and Director Golden:

Thank you for the opportunity to comment on HYM Investment Group's proposed redevelopment of the Suffolk Downs site in East Boston and Revere. WalkBoston looks forward to working with the City of Revere, EEA, BPDA, HYM, and other agencies and project stakeholders to help advance the proponent's stated goal of "creating a vibrant, mixed-use walkable community."

Leveraging connections between walkability and transit

The proponent's Expanded Project Notification Form (EPNF) reflects a strong commitment in principle to walkability and multimodal transportation connectivity. The proposed Phase 1 project emphasizes new pedestrian connections at the Suffolk Downs Blue Line station on the MBTA, and the Master Plan project is similarly premised upon pedestrian access to and from the Blue Line at Suffolk Downs and Beachmont Stations. Overall the Suffolk Downs site is well-positioned for walkable transit-oriented development, which is reflected in HYM's high anticipated mode shares for walking and transit for the Master Plan project. (The projected mode shares for walking range from 10.9% for office uses to 19.6% for residential uses; the projected mode shares for transit range from 45.4% for residential uses to 54.7% for hotel uses.)

The Phase 1 project has a much lower projected transit mode share of 37.5%, as well as a 44.4% projected mode share for single occupancy vehicles. We are concerned that this will create

MAKING MASSACHUSETTS MORE WALKABLE

significant auto dependency from the onset of this project that will affect the future Master Plan development as well. The proponent states that “while there will be emphasis to support a high proportion of alternative trip making by the Phase 1 Project, this more conservative mode share profile has been utilized given the Phase 1 buildings are being analyzed as a standalone project without the benefit of a mixed-use environment.” We urge the proponent to aim for more ambitious transit, walking and biking mode share goals for the Phase 1 development to maximize the site’s potential for transit-oriented development.

The proponent also anticipates over 54,000 new transit trips per weekday, including over 4,000 trips during the morning peak hour and over 5,000 trips during the evening peak hour. This number is very high relative to current Blue Line ridership levels. As part of their transit analysis for the Draft Environmental Impact Report (DEIR), HYM should detail how they arrived at this number and how Blue Line ridership will change as the Master Plan project is phased in over time. This analysis should be accompanied by the proponent also clarifying their plans to invest in capacity upgrades along the Blue Line as part of a broader package of Transportation Demand Management (TDM) strategies.

Exploring opportunities to reduce single occupancy vehicle trips and parking spaces

While the high projected transit mode share and ridership are positive attributes of this development proposal, the proponent still projects over 33,000 new vehicle trips per weekday, including over 3,000 trips during the morning peak hour and over 3,000 trips during the evening peak hour. This increased vehicular traffic has the potential to significantly affect congestion and pedestrian safety within the project site and along surrounding roadways. Given that vehicular access to the site is limited to just two intersections (Route 1A/Tomasello Way and Winthrop Avenue/Tomasello Way), the proponent should clarify how the project site and surrounding streets will handle this traffic in the DEIR. Significant mitigation measures will be necessary to address 33,000 new vehicles on already congested streets.

While HYM does not specify how many new parking spaces will be needed to accommodate these vehicles, WalkBoston calculates that between 10,800 and 16,200 new spaces will be necessary, depending on the development program and parking ratios used. (The proponent states that the following parking ratio ranges should adequately support the Master Plan project’s parking demand into the future: residential, 0.5 to 1.0 spaces per unit; office, 1.0 spaces per 1,000 SF; lab, 1.0 spaces per 1,000 SF; hotel: 0.5 spaces per room; retail: 0.5 spaces per 1,000 SF). We are encouraged by the relatively low proposed parking ratios for the residential units, as well as HYM’s broader recognition that auto trip rates are likely to decrease over time. The final residential parking ratio should be as close to 0.5 spaces per unit as possible and we look forward to reviewing HYM’s TDM plans as part of the DEIR. Any strategies and mitigation measures proposed must further enhance walkability, bikeability and transit access, while reducing single occupancy vehicle use and the associated need for parking.

Exploring opportunities for bus/shuttle connectivity and related pedestrian access

HYM notes that there are several MBTA bus lines (450, 459 and 119) along Route 1A and Winthrop Avenue within a half-mile walk of the project site, and that “there are opportunities to expand MBTA bus service into the project site and provide for internal site

transportation/shuttle to further improve access to public transit” as the Master Plan project is built out. The proponent should further explore and detail these options as part of their TDM plans in the DEIR, as increased utilization of MBTA buses and/or shuttles can reduce single occupancy vehicle use. An analysis of bus/shuttle options should examine the potential for increased service on existing MBTA bus lines and associated changes in ridership, as well as the potential to service the neighborhoods surrounding the project site. The proponent should also clarify their plans for investing in such services, whether through funding the MBTA or their own shuttles.

Ensuring that pedestrians can safely and comfortably walk to and from bus/shuttle stops is critical to ensuring that these services will be utilized. Ideally bus/shuttle stops will be located within a quarter-mile of the project site to maximize their usage. We appreciate HYM’s commitment to improving sidewalks adjacent to the project site to meet ADA standards and to include street trees if feasible, as well as their acknowledgement of the need for mitigation measures and infrastructure improvements at the site’s primary vehicular access points (Route 1A/Tomasello Way and Winthrop Avenue/Tomasello Way). The proponent states that “geometric and traffic signal improvements will be recommended at both of these intersections to optimize traffic operations.”

Improvements at these locations must also address pedestrian safety and traffic calming. HYM plans to widen Tomasello Way and Route 1A as part of the Master Plan improvements, yet there are no crosswalks across Route 1A near the project site and the crosswalk across Tomasello Way at Route 1A is already 140 feet wide with minimal pedestrian refuge. Any signal and roadway upgrades at this location and near other shuttle/bus stops must provide safe pedestrian crossings and well-timed WALK signals that provide countdowns and leading pedestrian intervals. Long crossing distances should be reduced as much as possible using curb extensions, and pedestrian refuges should be created and enhanced to provide protected waiting areas. In extreme circumstances, the proponent might consider working with the MBTA to relocate bus stops to more pedestrian-friendly locations.

Creating a walkable project site that meets Complete Streets standards

In addition to leveraging pedestrian access to and from the Blue Line, the proponent has integrated walkability and pedestrian connectivity into many other aspects of their redevelopment proposal. These include creating a new interior street network on site that meets Boston Transportation Department’s (BTD) Complete Streets guidelines, developing a system of multi-use ADA-compliant paths and trails that connects to adjacent neighborhoods and regional path networks, and activating the public realm with open space amenities and extensive ground-floor retail. Creating streets, sidewalks and paths that accommodate road users of all abilities and travel modes is critical to developing more livable and walkable communities, so WalkBoston is pleased to see a commitment to these issues in the EPNF.

We look forward to seeing more detailed plans for the interior streets, paths, intersections and signals as part of the DEIR. The interior streets should be designed to ensure that vehicles follow a 20 mile per hour speed limit to maximize walking safety as well as walking and transit mode shares. They should also include additional measures for pedestrian safety and traffic calming, including narrow vehicular travel lane widths, frequent and well-marked crosswalks,

and well-timed WALK signals that provide countdowns and leading pedestrian intervals. We encourage the proponent to maintain their current plans to not have vehicular access to the project site from Bennington Street or Waldemar Avenue, thus prioritizing multimodal connectivity and reducing the potential for increased local traffic.

Improving pedestrian safety throughout the project study area

The need for traffic mitigation is not limited to the immediate project vicinity and access points. To this end, HYM states that a mitigation program will likely focus on improvements to roadway geometry, traffic signals, and multimodal mobility along the broader Route 1A and Winthrop Avenue corridors, as well as Furlong Drive, the on-site roadway network, and other nearby intersections. The proponent also notes that many of the broader study area intersections are located within Highway Safety Improvement Program (HSIP) clusters and thus are potentially subject to Road Safety Audits (RSAs) per Massachusetts Department of Transportation guidelines. WalkBoston looks forward to reviewing a more detailed discussion of the Master Plan project mitigation phasing and recommendations for the timing of specific roadway improvement projects as part of the DEIR. We are also available to participate in future RSAs as needed. Once again, we encourage utmost consideration for pedestrian safety and traffic calming measures as part of any improvement packages.

Thank you again for considering these issues and feel free to contact us with any questions.

Sincerely,



Wendy Landman
Executive Director

Cc: House Speaker Robert DeLeo
Senate President Harriet Chandler
Senator Joseph Boncore, Transportation Co-Chair
Representative William Strauss, Transportation Co-Chair
Representative Adrian Madaro
Boston City Council President Andrea Campbell
Boston City Councilor Michelle Wu, Transportation Chair
Boston City Councilor Lydia Edwards, District 1
Revere City Council President Jessica Giannino
Revere City Councilor Steven Morabito, Economic Development and Planning Chair
Revere City Councilor Joanne McKenna, Ward 1
Becca Wolfson, Boston Cyclists Union
Stacey Thompson, LivableStreets Alliance
Andre Leroux, Massachusetts Smart Growth Alliance
Richard Fries, MassBike
Marc Ebuña, TransitMatters
Chris Dempsey, Transportation for Massachusetts



February 2, 2018

Tim Czerwienski
Project Manager
Boston Planning & Development Agency
One City Hall Square
Boston, MA 02201

RE: Suffolk Downs Redevelopment Master Plan

Dear Mr. Czerwienski:

I am pleased to submit these comments on the Master Plan of Suffolk Downs both as an East Boston resident directly impacted by the project and on behalf of GreenRoots, a local environmental justice non-profit organization which advocates on behalf of low income communities and communities of color in the immediate area. It feels fitting that these comments are being submitted on World Wetlands Day, as this proposed project is one that is located in a filled wetland subject to future flooding and will have a great effect on the nearby wetland and Area of Critical Environmental Concern, the Belle Isle Marsh.

As discussed below, we have strong concerns about the project that we feel have not been adequately addressed to date and should definitely be incorporated into the scoping determination. The nature of some of these issues would necessitate your denial of the request by the proponent for an expedited review and approval process for the Phase 1 Project. Additionally, given the unprecedented scope and impact of the project on the abutting neighborhoods as well as the region, we would further request that a greater effort on the part of the project proponent and the relevant regulatory bodies be made to present the results of the required further investigations resulting from the scoping determination in a form that is intelligible to the public. Given the demographics of the neighborhoods involved a greater effort in multilingual outreach and presentation is vital, but even for English speakers the highly technical nature of the information and the jargon contained therein also requires translation by a qualified expert *who is not advocating for the project* and could reasonably be considered “objective.”

Expedited Review Concerns

While we aim to address the Master Plan in this letter we do wish to take the opportunity to again emphasize our concerns regarding the project proponents’ desires for an expedited process for the Phase 1 of the project (the two office buildings (500,000+ sqft) expressly for the purpose of a potential tenant (Amazon)). While it is understood that the Amazon opportunity represents a potential benefit for the proponent, it is an opportunity, not a guarantee. The proposed Master Plan as presented by the proponent contains two development scenarios (their original plan without Amazon and one with Amazon), and as they have stated, they will be doing this project over the next 20 years or so regardless of Amazon’s decision. As such it does not seem reasonable to change the regulatory process for one potential tenant. This further solidifies this precedent that the state and city’s regulatory processes are secondary to the transient and self-interested concerns of the private sector at the expense of the public. The waiving of the process in this instance would then justify other projects changing the permitting process on the basis of the business interests of any developer or tenant. Given the

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expansive scope of the project and its potential impacts on both the community and the region, the development process to date has moved exceedingly fast. The project's Expanded Notification Form was filed with the city in November, and while there were several presentations before this, there are many in the community that have not had the opportunity to digest the copious and technical documentation that has been produced – especially with the holidays having been in between the release of these documents and the comment deadlines.

In particular, there are concerns (outlined below) that we feel must still be addressed before this Phase 1 project should move forward. Given the many attractive aspects of this project for Amazon or indeed any other commercial tenant, including two rapid transit stops, the expanse of (uncontaminated) space, the proximity to an international airport, a highly-educated workforce, and nearby world leading research universities and technology industries, it seems that the city would not need to bend further backwards for this project to be developed to the benefit of the proponent. Bluntly, if we have to bend the rules for this immanently developable project, what will we have to do for less desirable parcels? The risk of the loss of Amazon as a tenant does not in any way kill this project or make it less profitable for the proponent.

Housing Impacts

One salient issue for current East Boston residents is the availability and affordability of housing in a rapidly gentrifying neighborhood. In recent years East Boston has become one of the hottest real estate markets in metropolitan Boston and an increasing number of long-time residents are being displaced, despite the best intentions and desires of city planners. The Suffolk Downs project represents a massive direct impact on the housing market of East Boston (and Revere), as well as for the broader region. Nowhere in the presentations and documentation of the Phase 1 of the project is the impact of building two office buildings larger than any other current commercial office building in East Boston without any additional housing for the numerous new workers who would be coming to the neighborhood addressed. Much of the ENF, the Master Plan and the public presentations have spoken at length about the walkability of the development and its reliance on non-vehicular transit and creating a transit-oriented development. This implies that many of the employment opportunities at the site would be filled with people who would be living in some of the new housing opportunities on site. The Phase 1 project does not include housing; therefore, it will exert further pressure on the rental housing market in the neighborhood. The current Phase 1 study does not address this at all and accordingly does not provide any idea as to how local residents would be affected or how the detrimental impacts of this could be mitigated in the near term. Until this problem is properly scoped, its impacts defined and then addressed, and all of this analysis properly shared with the appropriate community members, the Phase 1 project should be delayed and certainly not expedited.

In terms of the Master Plan, the issue of affordable housing is addressed through the construction of the minimum required by Boston: 13% of the residential units must be affordable. This comes out to 1,000 affordable units which is good, however there are issues with this. Firstly, the definition of affordable (70-100% of Area Median Income) is in fact not particularly affordable for the CURRENT working class residents of East Boston. The market pressures of gentrification have driven up rents and housing costs while wages have remained stagnant for decades, resulting in Boston having the dubious distinction of the worst income inequality of any major U.S. city according to the Brookings Institution. How this impacts the City's affordable housing schemes is in the fact that the "area" considered in "area median income" is the entire city not the neighborhood where the development is occurring. Even with the median and not the average being used, the tremendous difference between incomes in neighborhoods like Back Bay, Beacon Hill and Downtown (especially in light of recent projects such as the Millennium

Tower) when compared to incomes in a neighborhood like East Boston results in increasingly higher and unattainable AMI levels for the residents of the neighborhood. Considering that the other 7,700 or so units of housing in the development will be market rate and potentially a very high market rate, this will only help to push the AMI higher and further wring out the working class from the neighborhood.

This process has continued unabated for decades from the South End to Fenway to Jamaica Plain, etc. It is not enough for our municipal leaders to repeat the same platitudes that we heard multiple decades ago and expect that the result will be different. While the proponent may be following the rules as laid down, those rules are clearly failing the residents of Boston. With a project of this magnitude in a neighborhood on the brink of passing a point of no return in terms of displacing the immigrants and working class people that have made the neighborhood home since the 19th century, the City must step up and demand more than the bare minimum.

Environmental Justice/Enhanced Outreach

While the current Environmental Justice policy of the Massachusetts Executive Office of Energy and Environmental Affairs is not triggered by the project despite it being completely surrounded on all sides by state-defined Environmental Justice census blocks and the project undoubtedly having a major impact on the daily lives of the people in those blocks, it makes sense in keeping with the intent and spirit of community outreach that the project proponent should make every effort to appropriately publicize its project within these EJ communities. While it is appreciated that the proponent has invested a great deal of effort in outreach to civically-engaged, English-speaking community members, better than 50% of East Boston is Spanish-speaking as first-language and to our knowledge there had been no community presentations in Spanish until our previous comment letter. At the last community meeting interpretation services were provided (although the equipment did not work) and recent outreach to Latino media and further Spanish-language outreach was pointedly mentioned. The effort is appreciated and we hope the next phases will continue and expand this outreach to potentially include some of the Arabic-speaking community as well. While the entirety of technical reports is not expected to be translated, synopses of these in Spanish would be helpful. As has been stated previously the non-English-speaking community composes a large percentage of the neighbors in East Boston, as well as Revere, and yet these populations are uninformed of a project which will most likely expedite the process of displacing them from their homes.

Land Uses & Community Impacts

This project, similar to other large-scale developments such as Assembly Row in Somerville, presents the wholesale creation of an entire neighborhood anchored by transit infrastructure. This vibrant neighborhood is composed of housing (87% market rate) with commercial office space (e.g., the Amazon potential) and retail. We are assured by the proponent that the retail is slated to be restaurants and shops that are not necessarily chain stores and “big box” retail. In looking at what makes vibrant neighborhoods in other established parts of the city, we see other uses such as places of worship, public schools, libraries, civic institutions such as the YMCA or the East Boston Social Center. There are municipal buildings, police and fire stations, and other non-commercial entities. This is over 160 acres of an urban neighborhood which may be more like a mall than a neighborhood.

Due to the nature of the flooding concerns on the site there is, laudably, a strong emphasis on open space in the Master Plan. The dual retaining pond/open space feature which incorporates Sales Creek and the pond in the middle of the race track oval dominates the site plans presented at the community meetings. This space, unlike Bremen Street Park, Piers Park, the Condor Street Urban Wild or any of the other heavily utilized East Boston open spaces would be privately held by the owners of the properties

on the site. While the Boston Parks and Recreation Department may appreciate not having an additional maintenance burden, there is a question as to how “public” this open space would be. Currently this open space is privately held and generally off limits to the public, however if we are discussing the creation of a neighborhood and not a gated community or a mall, then we should be clear as to what of this project is within the public realm and what is private. This should be addressed in the scoping determination.

In thinking of the lack of municipal buildings, one begins to think about where those municipal services will come from. There will be an increased need for police, fire and ambulance services to these new residents. Additionally, there will be an impact on the school system from the presence of new residents. The impact on these services should be explored in the scoping determination.

Building Massing

Aside from a row of townhouses along the southeast corner of the property abutting part of Orient Heights, the majority of the buildings in the Master Plan are depicted as blocks of very large (relative to East Boston’s existing structures) buildings across the site. The lowest of these blocks would be 125 feet while the highest could go over 200 feet. Buildings of comparable size in East Boston are found standing alone (the hotels at the airport and on McClellan Highway, the Gumball Factory and the Eddy). In this case the massing of these buildings in 30 or more blocks from one end of the site to the other represents a scale completely out of line with the neighborhood. Understanding just how this would not only appear but also feel to a pedestrian walking through this landscape in comparison to the current neighborhoods of East Boston is not easily communicated by merely floor area ratios and artist’s renderings. The scoping of this project should include existing examples in the Boston area of similarly massed street blocks for residents to have an understanding of what is about to happen. Indeed, the impact on the surrounding community is unclear. Typically, the existence of conditions such as adjacent building heights is frequently used by developers to justify similar construction nearby (as can be seen by the increasing number of four story buildings going up in what were blocks once zoned for triple deckers). Is it reasonable to assume that the construction of such as a massive development in East Boston is going to be used as a justification for increased height and massing in other parts of the neighborhood? How does the proponent and, more importantly, the City address this?

Technical Capacity

An additional concern, which is a perennial one for these processes, is the ability for the affected communities to be able to critically evaluate what is presented to them by the consultants working for the Project Proponent. Technical jargon around traffic counts and floor area ratios (FAR) are not relatable to residents who do not work in traffic engineering, real estate, or municipal planning. While the traffic counts provided are said to incorporate the impact of other development projects and growth in the region (and their accompanying traffic), the reports do not directly answer the question as to what will be done to ensure that the traffic will not be far worse than it already is. The numbers and assurances given do not click with the lived experiences of residents who cannot find a seat on a crowded Blue Line train or sit for an hour in traffic just to get from Orient Heights to the entrance of the Sumner Tunnel.

This particular concern of traffic forecasts and capacity is a highly technical one and the general public (much less the Spanish-speaking public) cannot be expected to have the knowledge to be able to rebut the assertions of paid consultants. Unfortunately, the project proponent’s consultants are the only resource available to the public, and they can hardly be expected to provide an analysis that would be against the interests of their client to the benefit of the public. There needs to be additional resources

and time provided for the community to be able to receive *unbiased* technical assistance to evaluate the project and the assertions of the Proponent, not only for concerns relating to traffic, but also in the areas of stormwater, flooding and climate change concerns, building shadow impacts and other areas. We hope that within the scoping determination there is a request for the proponent to provide some plain English analysis or, better yet, that the City is able to translate the technical material for the community through a third party expert on the given topics.

In conclusion, we urge you to deny the request for an expedited review and approval process for the Phase 1 Project, and to require the project proponent to sufficiently address the various concerns outlined above. We also hope that the City will do a deeper dive on this project in regards to affordable housing, technical assistance to residents and enhanced outreach in Environmental Justice communities. We greatly appreciate the efforts that have been made by the Project Proponent and the City in the short time we have had so far to review a highly complicated project that will be ongoing for decades and will have impacts lasting generations. Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read 'John Walkey', is centered on a light gray rectangular background.

John Walkey
Waterfront Initiative Coordinator
GreenRoots

[Redacted contact information]

Comment: Created Date	First Name	Last Name	Organization	Opinion	Comments
1/4/2018	Joshua	Acevedo		Support	I have now attended numerous presentations regarding the development of Suffolk Downs and am very supportive of the plans that Hym Investment group has for the site. I believe the site has been under utilized for a very time and am eager to see new life breathed into the very large site. Soon I will be a direct abutter, as I will be moving to Waldemar Avenue, and while I would love if Amazon chooses the site will be glad to see the vision Hym has of a mixture of retail, housing and commercial come to fruition. I am also supportive of the expedited approval process for the two commercial buildings. It would be nice though if in addition to the required funds given to affordable housing that some funds be donated to Salesian, Zumix and Piers Park Sailing Center as these are very important local organizations.
1/9/2018	Anthony	Cherry		Oppose	I strongly, strongly oppose any further development of East Boston unless it can be wholly assured that such development would benefit the people already living here. In the last few years or so, development of East Boston has resulted in heart-breaking gentrification and skyrocketing housing costs that make it impossible for low-income people, people of color, and immigrant communities to continue living here. This is problem faced all across Boston. Some changes I would suggest: 1. We definitely do not need an office building because that will only invite more white collar workers into East Boston, pushing current residents out. 2. Any new residential area should have a substantial amount (at least half) of apartments/units/whatever set aside for low-income people, especially low-income people who have lived in East Boston for years but cannot continue to pay rent at their current home. "Low-income" should be more strictly defined than it is across the rest of Boston. There's a building in downtown Boston that defines "low-income" as making less than \$70,000 a year. The median income of the United States is less than \$60,000. \$70,000 cannot be low income. 3. Any new marketplaces should do their best to reflect the makeup of East Boston, and current residents of East Boston should be given priority in buying/renting them. That way, we can avoid the gentrifying nature of development. Unless all of these parameters are met, I cannot and will not support this plan. It's awful and it's a shame what's happening to East Boston. It's heartbreaking to watch a neighborhood that has historically had such a vibrant culture (especially a vibrant immigrant culture) fall apart. Mayor Walsh would do well to actually support the people of Boston. Thank you for reading.
1/16/2018	Elisabeth L	Daley		Oppose	I live in Lynn and work in Quincy and I drive or use transit to get to work. I am super concerned about traffic in the Suffolk Downs area. Every day, during and outside of rush hour, it is bumper to bumper, crawling along. A new development at Suffolk downs is only going to add to what is already a bad situation. Please make sure that any development MUST include road enhancements and incentives for use of transit, NOT incentives for owning and using a car. Contributions to extending the Blue Line to Lynn would be excellent, as (when completed) use of the Blue Line by Lynners and others would go a long way to limit automobile use into Boston from this area. Thank you.
1/17/2018	NK	Acevedo		Neutral	I used to live at Beachmont & am happy to see the horse track leave. I am not happy if you make luxury condos & don't have anything that is affordable for people making less than \$50k/yr.

Comment: Created Date	First Name	Last Name	Organization	Opinion	Comments
1/29/2018	Derek	Edwards		Support	Please include high quality bicycle linkages (bike paths, bike lanes, etc.) to all surrounding neighborhoods. Please encourage surrounding neighborhoods to expand their bike facilities as well. East Boston and Revere should have much higher-quality bicycle infrastructure than they currently do. This large project, that spans both of those cities, can push the needle in the right direction for creating safe and practical bicycle infrastructure. Also, don't forget a Hubway station (or two)!
1/29/2018	Maure	Aronson	World Music/CRASHarets	Support	A recent study completed by the City of Boston draws attention to the dire need for artist rehearsal and performance space in Boston. I encourage the developers to include affordable rehearsal space for Boston's theater and dance community. I also encourage the developers to plan for an outdoor concert venue with a capacity of 1000-1500 which will make Suffolk a summer destination.
1/29/2018	Jason	Kaplan		Support	I support this project as proposed.
1/29/2018	Maggie	Simeone		Neutral	Bicycle infrastructure should be an integral part of the design. Please prioritize creating protected bike lanes to this location, as it would benefit both the businesses in this development as well as the residents of East Boston.
1/30/2018	Gary	Dunning	Celebrity Series of Boston	Neutral	<p>January 29 Brian P. Golden Director Boston Planning and Development Agency One City Hall Square Boston, MA 02201 Dear Mr. Golden,</p> <p>As the President and Executive Director of Celebrity Series of Boston, I am writing to recommend that the BPDA give strong consideration to the arts and cultural component of any plan submitted for the Suffolk Downs development project. The City and the BDPA demonstrated a laudable commitment to the creative sector in two recent developments: Seaport Square and 252-264 Huntington Avenue projects. In both cases, the BPDA responded to specific needs identified by the arts sector as well as by the City's own, detailed Facility Needs Assessment. I would urge that the Suffolk Downs developer be required to respond to how their project would help solve the needs identified in the City's study. While the response in the other two projects focused on performing arts venues, the City's study also identified rehearsal space, artist spaces and artists' live/work spaces as facilities essential to a healthy and vibrant city that are currently lacking in Boston. I would urge the developer to engage with the arts community to assess, from their own perspective, the cultural needs of the city and to include some proposed solutions in their subsequent development plans. BPDA has already demonstrated that such dialogue and research can lead to mutually beneficial and exciting enhancements to development projects. Founded in 1938, Celebrity Series has established itself as the largest and preeminent non-profit presenting organization in New England. Excellence, innovation, and agility are at the core of who we are and what we do. Collaboration is embedded in our organizational DNA. Over eight decades, Celebrity Series has gained the trust of audiences and artists, and developed a reputation for artistic excellence with programmatic diversity. With over sixty-five annual main stage performances in eight to ten different performance halls and over 150 annual community engagement events throughout the Boston area as part our Arts for All! program, Celebrity Series is now a crucial part of the cultural fabric of Boston, introducing audiences to new artists, new art forms, and new artistic experiences.</p>

Comment: Created Date	First Name	Last Name	Organization	Opinion	Comments
					Without Celebrity Series, Bostonians would have to travel to New York City, London, Paris, Shanghai or other cultural capitals to see the quality and variety of artists that regularly appear on our roster. I applaud the work of the BPDA and urge you to continue to include arts and cultural as beneficial components of large scale development projects such as Suffolk Downs. Sincerely, Gary Dunning President & Executive Director Celebrity Series of Boston
2/1/2018	Tania	Del Rio	City of Boston	Support	So far, the information about this project that we learned from HYM during the Eagle Hill Civic Association meeting and in the information provided by the BPDA is encouraging and welcome. The rendering looks great and I welcome the focus on transit-oriented development. My input for this huge project would be: 1) Consider including an outdoor public aquatic facility in one of the open space sections of the project. Pools like the Mirabella in the North End are a tremendous community resource as a place for recreation for people of all ages, they encourage healthy living, and promote community building. As a neighborhood with a rich maritime history, such a facility could be a space to celebrate this heritage. Eastie only has one indoor pool, at the Paris St. Community Center. In the summer, the only outdoor alternative is Constitution Beach, but it does not allow for a swim team or fitness swimming. I think this would be a tremendous addition to the neighborhood. Aquatic facilities also add to the area's resilience as climate changes. 2) Green spaces. No need to explain why these add value in many ways. Please do not over-develop. Also, the NOAH affiliated youth have raised awareness about the dire shortage of trees in East Boston. Tree canopy is important to avoid heat islands, which affect our seniors, and it is BEAUTIFUL. Please consider investing in tree planting on this site and also in the rest of the neighborhood when you consider mitigation investments.
2/2/2018	Luz	Zambrano	CSIO	Oppose	I oppose the idea of just creating a mega project that is not going to really benefit the most marginalized and disadvantage people in East Boston. People are being displaced in a daily basis. People of color have being displaced in alarm #s but doesn't seem that the developers or the city are concern about this. Immigrants in particular have sustained and helped develop Boston neighborhoods for decades but now with the rapid development of East Boston even the ones that say they are building affordable housing.. they are not... because the question is affordable for whom? Do you think this mega project in Suffolk Downs can invest some of its profits in projects that really help move all of us forward. In my neighborhood, East Boston, we are trying to find a little lot to create cooperative housing but just getting info from the city about this or to have anybody willing to seat with us and talk about this idea is out of our reach. Please do not forget the poor and invest in them. Thanks:)

Comment: Created Date	First Name	Last Name	Organization	Opinion	Comments
2/2/2018	Matthew	Barison		Support	<p>I support this project, but I have a few caveats. I think the project team has done a great job designing the site to take advantage of natural resources, such as the creek, pond, and green space. I hope that their commitment to 25% green space can be memorialized and enforced. However, I am concerned that in all the space, not one parcel has been set aside for non-commercial community use. While outdoor walking paths are nice, the truth of the matter is that in this climate, year-round indoor space is necessary. I would implore the BPDA to insist that the developer set aside one to three parcels on the site purely for non-commercial community use.</p> <p>Amenities that would benefit the community include: a performing arts theater and black box, a community recreation center (gym and pool), and art gallery/event space. Reserving some 2nd floor spaces above stores is not sufficient. In addition to community uses, I hope to see some civic space at the site, such as a school, post office, police station, or adult educational center. As Boston will apparently be shouldering most if not all of the residential development, allotting space for a new PUBLIC school (something East Boston desperately needs anyway) would be a wonderful gesture. There is a great need for a middle school and a vocational technical high school. Furthermore, I would request that the BPDA work with the proponents of this project and the Walley St. development by the Suffolk Downs MBTA station to preserve the old streetcar tracks on Walley St. I have suggested that the Suffolk Downs development incorporate an internal circulator; while a bus would suffice, a streetcar would be a real place maker. East Boston used to have a lot of streetcar routes, and one connecting Suffolk Downs and Beachmont, through the project site, would be a wonderful addition. -Matthew Barison</p>

Comment: Created Date	First Name	Last Name	Organization	Opinion	Comments
2/2/2018	Catherine	Peterson	ArtsBoston	Neutral	<p>February 2, 2018 Brian P. Golden Director Boston Planning and Development Agency One City Hall Square Boston, MA 02201 Dear Mr. Golden:</p> <p>On behalf of ArtsBoston, Greater Boston's largest arts service organization and a leading champion for the power of arts and culture to transform communities, I writing to encourage the Boston Planning and Development Agency to prioritize the inclusion of an arts and cultural component in any plan submitted for the redevelopment of Suffolk Downs. Among ArtsBoston's core constituencies are our 175 arts member groups, which cross all budget sizes and disciplines. We also help the broader arts sector raise awareness of performances, events, and other arts and culture experiences that are happening in every corner of the City and the Greater Boston region. From this work, we know how important arts and culture activity is to a vibrant sense of community and place, and how the inclusion of cultural facilities in development plans can catalyze incredible, positive change and growth in a neighborhood. In our 2014 cultural impact report, The Arts Factor, we used as a case study the story of the development of the Stanford Calderwood Pavilion at the Boston Center for the Arts as a perfect example of the transformative power of cultural facilities development. From this perspective, we are very pleased that the City and BDPA have embraced similarly ambitious plans that integrate arts and cultural facilities for the 252-264 Huntington Avenue and Seaport Square projects. In both cases, the BPDA responded to specific needs identified by the arts sector as well as by the City's own, detailed Facility Needs Assessment. As proposals are solicited for Suffolk Downs, I would encourage the BPDA to apply these same recommendations. The Seaport and Huntington Avenue projects do indeed address the need for more performing arts venues, but there are still many outstanding challenges, including a lack of artists' live/work space, rehearsal space, and studio spaces. A healthy arts infrastructure will have all of these kinds of facilities, and if Boston is to build a truly sustainable arts and culture ecosystem, we need the City and the BPDA to take the lead on making them happen. I look forward to engaging both our ArtsBoston team as well</p>
					<p>as our arts member groups in a generative conversation with the Suffolk Downs developer so that it can better understand the need for and value of including arts and cultural facilities in its plans, and perhaps explore some new ideas that can help fill in the gaps that remain unaddressed by the existing projects. Thank you for the work that the BPDA has already accomplished and for your continued attention to the critical role that the arts and culture sector can and should play as we transform our City through creative redevelopment projects like Suffolk Downs.</p> <p>Sincerely, Catherine Peterson Executive Director ArtsBoston</p>

Comment: Created Date	First Name	Last Name	Organization	Opinion	Comments
2/2/2018	Magdalena	Ayed	Harborkeepers	Neutral	<p>Thank you for the opportunity to provide comments on the Suffolk Downs redevelopment project Master Plan. While I note that HYM Investments made a good faith effort in a fair community process, it isn't enough to assure wholistic community engagement regarding what they are proposing and how their development plans interplay with the City of Boston's Amazon bid. As the leader of an environmental advocacy organization, The Harborkeepers, I have the opportunity to work on environmental impacts closely with community and especially with respect to waterfront and Harbor issues. While I see and promote opportunities to collaborate to mitigate impacts, I also see how environmental impacts affect our community. East Boston suffers a disproportionate amount of impacts of a socio-economic and environmental nature. Our neighborhood is a hub for many things: an airport, ground transportation, industrial terminals, a gateway for new immigrants and now a rapid luxury development phase, all factors that cumulatively through the years until today has caused displacement, environmental and transportation degradation and economic fragility and disparities, public health impacts; impacts which remain a threat to socio-economically challenged populations in East Boston today. Clearly, the existing Suffolk Downs racetrack and facilities do not offer any opportunities for growth in its current state and hence, I welcome any opportunities for growth and development that will improve the neighborhoods character, infrastructure, public safety, climate resiliency and adaption, environmental quality, economic opportunities and so forth. My concern is that the opportunities that will be created will remain for those who are already well-suited to benefit. Many entrepreneurs, wealthier residents and businesses will be from outside of East Boston. As an environmental justice community, as is designated by the Commonwealth, our communities are already 'behind the 8 ball', meaning we are at a disadvantage. This means existing residents may not have the buying power to purchase property from any of the housing development that may arise at Suffolk Downs nor they may not necessarily be able to live there, given there will only be a minimum commitment of 12% affordable housing, nor may they even perhaps have disposable wealth or credit to invest in a business, leaving the local business community at a disadvantage over other regional business profiteers who may easily have the resources to rent, lease, purchase property and establish business ventures. Furthermore, based on documents I have read, I am really concerned about lack of ground transportation mitigation proposed to accommodate for the proposed number of trips. According to the MEPA document on Project Size and Environmental Impacts, footnote #4 proposes that the adjusted DAILY vehicular trip estimate is over 32,000</p>
2/2/2018	Indira	Garmendia	Centro Cooperativo de Desarrollo y Solidaridad	Oppose	<p>Nuestra preocupación con el proyecto es sobre la accesibilidad de la vivienda en East Boston para la comunidad inmigrante de bajo ingreso residente en East Boston. Cómo este proyecto realmente va a apoyar la crisis de vivienda que esta pasando East Boston? Cuáles son los beneficios concretos que van a recibir los residentes de East Boston con la construcción de este mega proyecto, tomando en cuenta que aumentará el tráfico vehicular, habrá más personas consumiendo servicios públicos, contaminación en el ambiente por la construcción: Ruido y polvo?</p>

Comment: Created Date	First Name	Last Name	Organization	Opinion	Comments
2/2/2018	Cyrus	Tehrani		Support	I would like to voice my full support for this project and, in particular, the housing density of the master plan. We're in the midst of a housing crisis and should be building 7,500 units at a minimum, depending on Amazon's choice. Though I am not an East Boston resident (I reside in South Boston), this project positively affects the affordability of housing across the city considering the scope of additional housing supply it will add to the market. 7,500 units is more units than than the city approved across all neighborhoods in 2017 and represents 12% of the city's goal to build 59,000 new units by 2029. That's why this project is so important to every Bostonian. This project also eases the pressure on low income vulnerable communities across Boston who are currently being displaced due to our low housing supply. 1,000 IDP units as well as the market rate units will truly help affordability for all Bostonians across every income level. I hope that you approve the master plan as proposed.
2/3/2018	Glynece	Kokkalis		Support	Attended the Tuesday 1/30/18 meeting at Suffolk Downs. Heard a lot of good things. Is there any similar projects comparable to this Master Plan currently in progress any where in the country. It would be interesting to me to look at that. Traffic is a major concern to all us. Please let the Revere and East Boston communities know what we can do to help lead the charge on a state and federal level to improve the North Shore commute on a Daily basis. I have worked in the luxury apartment industry in Boston for the last 5 years. Projections of smaller cars, usage of zip cars and the like have been over estimated and new residents will still use their cars a lot. In fact the number of parking spaces have became less along with the atual size of spaces in garages and dissatisfaction in a lot of the newer communities. Please make sure the communities residents are involved in the every day use of this project. YMCA, Meeting facilities, Historic component how about a History Museum/ A Maratime Museum....there are none in Boston. Community Gardens where students can manage and learn... also feature the arts with community participation. I love to be an active participant in this project and have taken a sabbatical from work and would love to help any way I can.



Tim Czerwienski <tim.czerwienski@boston.gov>

Suffolk Down Proposal - East Boston resident

Melissa Campbell [REDACTED]
To: tim.czerwienski@boston.gov

Tue, Jan 2, 2018 at 2:07 PM

Hi Tim,

My name is Melissa Campbell. I am a resident of 135 Addison St in East Boston. I am the Secretary of the Harborview Neighborhood association and my family has been in East Boston since the 1890s. Our representative, Skip Marcella, attended the meeting as I was unable to attend.

We look forward to having the space being used for something that would benefit the neighborhood, but do want to voice our concerns about the effects on the neighborhood.

My thoughts are below:

Would love to have businesses that are currently missing in East Boston. A nice gym (spin studio), an upscale grocery store (Whole Foods) would be a great benefit to the community. Currently East Boston residents have to venture into the city (for me, Charlestown) to get my dog groomed, go to Whole Foods, work out, which increases traffic for our neighborhoods and theirs.

As an Addison resident who takes 1A every day (make the U turn by Starbucks to go into city back), I am very concerned about the influx of cars. Most days it takes me about 30 minutes to get from Addison St through the Ted Williams (I commute to Framingham every day). Vice versa, it takes a very long time to get back to East Boston. I can't imagine what 7k – 10k units will do to East Boston traffic. Its already very stressful to live in this neighborhood driving wise and I can't imagine what every day trips to Target to get gas etc will be like.

I understand there will be more housing units but I think we need to be cognizant that all East Boston residents will need to be happy (both old and new) in order to make Eastie flourish. When everyone becomes miserable because of packed T trains and awful driving commutes, then we become bad neighbors and less proud of our neighborhood.

Thank you for your time

Melissa



Tim Czerwienski <tim.czerwienski@boston.gov>

Project Comment Submission: Suffolk Downs

kentico@boston.gov <kentico@boston.gov>

Thu, Feb 1, 2018 at 7:02 PM

To: BRAWebContent@cityofboston.gov, tim.czerwienski@boston.gov, jeff.ng@boston.gov, comment_email_processor@o-2zlaqa64yog14nfnqlzmbbrpfox00q4is2vvlpd3irp6a8fovy.36-1heureao.na30.apex.salesforce.com

CommentsSubmissionFormID: 2645

Form inserted: 2/1/2018 7:02:04 PM

Form updated: 2/1/2018 7:02:04 PM

Document Name: Suffolk Downs

Document Name Path: /Development/Development Projects/Suffolk Downs

Origin Page Url: /projects/development-projects/suffolk-downs

First Name: John

Last Name: Murphy

Organization:

Email: [REDACTED]

Street Address: [289 Endicott Avenue](#)

Address Line 2:

City: Revere

State: MA

Phone: [REDACTED]

Zip: 02151

Opinion: Support

Comments: Happy to see the Beachmont side get cleaned up and developed. Was strongly against the casino. Would love to see the border fence with Beachmont/Winthrop Ave either removed and replaced with something 'nicer' while progress is happening or at the very least freshened up with new paint or plantings. The trash can build up along there so upkeep of that would be appreciated. As someone in the neighborhood without a car I walk to the shoppes there to grocery shop and would love it if during the phases of construction a fenced off direct walkway/pedestrian street could intersect from Beachmont T to the market. I think it would give us a sense of the upcoming neighborhood in there and most importantly be a nice little cut through. I know the east Boston side is to be developed initially but would love to see something erected on the Beachmont corner. Nothing big but something to clean up that space there. We've lived with horse barns forever behind that gawd awful fence and a little something would go such a long way. Would be a great start to that path too... BTW, my great uncle built installed that fence and I still dislike it. I know it's a security/secure thing but it's just so hideous for Beachmont. Like a wall keeping us out and away from it all. Thank you.

[Quoted text hidden]



Tim Czerwienski <tim.czerwienski@boston.gov>

Suffolk Downs Redevelopment

Hector Conde [REDACTED]

Fri, Feb 2, 2018 at 12:03 AM

To: tim.czerwienski@boston.gov

Cc: Claudia Sierra [REDACTED]

Hola buenas noches

Mi comentario acerca del proyecto es maravilloso aunque declaro estar en una posición NEUTRAL.

PORQUE?

Yo vivi en East Boston los pasados 13 o 14 años y debido a estos proyectos de transformación que ENCARECEN TODO "general" me encontré obligado a cambiarme de MI BARRIO a OTRO BARRIO ya que en East Boston los costos de vivir se han puesto por las nubes....

Aqui ya entra un problema social que yo lo llamaría "DESPLAZAMIENTO" y no considero justo que esto le siga pasando a mas personas....

Gracias

Hector M Conde
Liason Boston
Colombian Cultural Committee of Merrimack Valley
www.cccmv.org
Sent from my iPhone



Tim Czerwienski <tim.czerwienski@boston.gov>

***IAG Member* Comment on Suffolk Downs Master Plan**

Ernani DeAraujo [REDACTED]

Fri, Feb 2, 2018 at 10:44 AM

To: "tim.czerwienski@boston.gov" <tim.czerwienski@boston.gov>

Cc: "Madaro, Adrian - Rep. (HOU)" <Adrian.Madaro@mahouse.gov>, "lydia.edwards@boston.gov"
lydia.edward@boston.gov, Jo e Garcia Mota jo e.garcia.mota@boston.gov

Dear Tim:

I write this message in **support** of the proposed Master Plan by HYM for the Suffolk Downs site. While I share much of the support and concerns expressed by other IAG members, I'm especially concerned about the housing on the site.

I support HYM's proposal to create thousands of desperately needed housing units for the greater Boston region. An arcane zoning code and challenging building process has enabled Boston and other cities and towns in the Commonwealth to hoard homes for the lucky few instead of creating new living spaces for growing families and newcomers. I hope that HYM sticks to its proposal to produce diverse housing types--workforce; dedicated affordable; range of market rate; and specialized living for the elderly, disabled, and artists. One area where their housing proposal falls short is with respect to dedicated affordable housing. HYM proposes to meet the Mayor's executive order of 13% dedicated affordable housing. **At a minimum, HYM should build 20% dedicated affordable, a percentage that roughly approximates the percentage of dedicated affordable in Boston.**

Over and above this 20% affordable goal, HYM should dedicate mitigation funds to be spent in East Boston to preserve affordable living and create new affordable units where possible. Housing inequality is the number one issue impacting the families in East Boston and Boston at large. Mayor Walsh has successfully expedited the building process for new homes, but we can't get out of a problem that was decades in the making in a few short years of building. Restrictive zoning has proved to be an enemy of people of color, immigrants, and the working class. HYM has an open canvass where they can build tall and wide to address the needs of families to live in safe, clean homes they can afford.

Thank you for your consideration.

Ernani Jose DeAraujo
147 Trenton Street, #1
East Boston, MA 02128

Madeleine Steczynski
Alex DeFronzo
Suffolk Downs Impact Advisory Group

Director Brian Golden
Boston Planning & Development Agency
One City Hall, Ninth Floor
Boston, MA 02201

February 1, 2018

RE: Suffolk Downs Master Plan – 525 William F. McClellan Highway

Dear Director Golden:

HYM Investments hopes to develop a mixed-use neighborhood at Suffolk Downs. The development is the largest single contiguous development site in Boston. It also encompasses a large tract of land in Revere. While the development is a far better outcome for the Cities of Boston and Revere than what had been proposed at the site previously, the sheer size and scope of the development will have wide-ranging consequences for the surrounding communities. HYM has made commendable efforts to present their vision for the site and to solicit community feedback for their master plan. We commend the leadership of HYM for presenting their project personally, and are particularly pleased with their commitment to building a “pedestrian-friendly neighborhood” with significant open space and diverse housing types (workforce; dedicated affordable; range of market rate; and specialized living for the elderly, disabled, and artists) to attract and serve a diverse community.

We feel, however, that given the proposed eleven million square feet of development on the East Boston side, more community input is needed and that the massive scope of the project requires a more comprehensive approach than the typical Article 80 Large Project Review. The City of Boston has already endorsed the Suffolk Downs master plan, as proposed, in the Amazon HQ2 response proposal. This endorsement, delivered without community input, has created a material impact on our neighborhood’s ability to provide feedback and to mitigate various aspects of the Suffolk Downs master plan proposal. The Impact Advisory Group has made numerous requests of the proponent to provide information that we have not yet received, including the production of a 3D model, modifications in massing setbacks on the Waldemar Avenue side of the project, and the mitigation measures shared below. As information on these inquiries have not yet been provided, we request that the BPDA defer a vote on the master plan until the proponent is able to respond to the IAG’s requests. We also request the support of a paid community liaison with expertise in major development projects to help the Impact Advisory Group understand the complex impacts of this project on East Boston, and to help facilitate the negotiation of project mitigation on behalf of the Impact Advisory Group, independent of HYM or the BPDA.

East Boston currently faces a number of community-wide challenges including a lack of affordable housing, displacement of families related to housing costs, traffic and congestion, 1,600 or more youth with no access to out-of-school programming, the threat of rising sea level and severe weather events, and displacement/loss of local businesses as rents increase, and larger retail and commercial entities move into the neighborhood. Locally and City-wide, nonprofits are being hit particularly hard, as commercial rents skyrocket, and increased housing costs threaten their constituents as well as their staff. In addition, Boston’s arts community is struggling to find appropriate space in the City. It is our hope that the Suffolk Downs development will work to address these concerns, rather than further exacerbate their effects. Some specific baseline commitments that we hope can begin to ensure a successful outcome for our neighborhood and for the project proponent include:

Live:

- A commitment to 40 acres of open space including connection of the East Boston Greenway from the north to south side of the parcel.
- A commitment to 20% inclusionary housing in both the Boston and Revere parcels, with at least 18% on-site and linkage funds to remain in East Boston.

- A commitment to building, in each phase of the Suffolk Downs development, at least one affordable space designed specifically for cultural and community gathering (i.e. a church, nonprofit service organization, gallery, performing arts space, locally owned café, or a woman, immigrant, or minority owned business)
- A commitment to fund a comprehensive capacity study on the impact of 10,000 new housing units on Boston Public Schools.

Work:

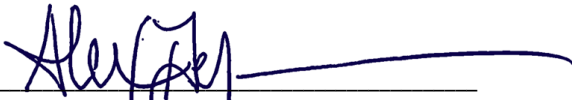
- A commitment to fund a minimum of \$15m toward the construction of a Blue/Red line connector for the MBTA.
- A commitment of a minimum of \$3m to rehabilitate the Suffolk Downs T-Station and to improve entry to the Beachmont T-Station.
- A commitment to work with the City on the creation of affordable live/work space for artists and nonprofit organizations.
- The creation of temporary and long-term jobs for East Boston residents, young and old.
- A commitment to construct paid street-level and garage parking that integrates the principles of intelligent urbanism and transit oriented development with the goal of discouraging driving to the site, using the site solely for the purpose of parking, and parking for extended periods of time.

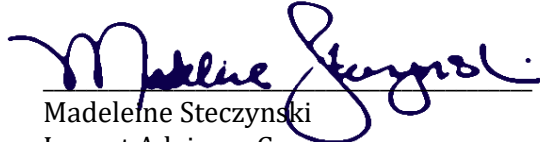
Connect:

- A commitment to the creation of a perpetual community benefit fund supported by HYM to be managed by an open and transparent external charitable foundation.
 - Until such foundation is formed, funds contributed by HYM should be held by the BPDA.
 - A commitment for HYM to contribute \$2 for every square foot of development constructed prior to issuance of an occupancy permit, and \$0.50 annually per square foot developed on the site as a whole in perpetuity.
 - 10% of which should be dedicated to an on-site small business incubator facilitated with support from the East Boston Chamber of Commerce and East Boston Main Streets, 10% of which should be dedicated to a teacher-directed enrichment fund for public schools located in East Boston, 10% of which should be dedicated to community health initiatives facilitated by the East Boston Neighborhood Health Center, 10% of which should be dedicated to local faith-based leaders to support the most needy families in East Boston, 10% of which should be dedicated to the Friends of the East Boston Greenway for expansion and maintenance of the Greenway, 20% of which should be dedicated to capital improvement fund managed by the external foundation for East Boston 501(c)(3) organizations, and 20% of which should be dedicated to youth-serving nonprofit organizations in East Boston.

As a community, we were heartened that the City of Boston recognizes East Boston as the vibrant neighborhood it has always been. We are both honored and anxious to have been listed as the most attractive and sensible neighborhood for Amazon’s HQ2 in Boston. Whether Amazon chooses Boston and the Suffolk Downs site or not, HYM must work constructively with the community to strengthen and not harm the surrounding neighborhoods.

We hope to work together with HYM, the BPDA, and our neighbors to achieve what we know is possible: an innovative, sustainable, community-supported project that will serve as a means of lifting up every member of our diverse neighborhood, as a flagship development for the city, and as a gratifying and financially viable project for HYM.


 Alex DeFranzo
 Impact Advisory Group
 53 Jeffries St. Apt. 1
 East Boston, MA 02128


 Madeleine Steczynski
 Impact Advisory Group
 103 Webster St.
 East Boston, MA 02128



Tim Czerwienski <tim.czerwienski@boston.gov>

Comment for the HYM Suffolk Downs Project

Marisa DiPietro [REDACTED]

Fri, Feb 2, 2018 at 1:25 PM

To: Development Review at the BPDA <Tim.Czerwienski@boston.gov>

Dear Mr. Czerwienski,

I am writing to you to comment on the Suffolk Downs project. First, I want to say that I am immensely impressed by the level of professionalism, thoughtfulness and respect shown by the HYM Investment Group and I admire their willingness to build a community, rather than a straight development. On that note, I would like to add my request that a child care center be considered as part of this project. There is a need for quality child care services in East Boston, particularly in the Suffolk Down area. The East Boston Social Centers, where I am employed, is a 501 (c) (3) non-profit multi-service agency that has served the children, families, senior citizens and community of East Boston since its founding in 1918. A major piece of our programming is Child Care. Our four Early Learning Centers provide childcare year-round to 145 children. These centers offer high quality childcare and are licensed by the Dept. of Early Education and Care (EEC) and accredited by the National Association of Educators of Young Children (NAEYC). The Centers provide transportation and nutritional meals for all of the children in our programs and work to develop the children's social, emotional, cognitive and self-help skills. The School Age Childcare program provides affordable after-school care to approximately 150 children, ages 5 to 14 during the school year, including full time during school vacations. The School Age Child Care Program is also licensed through EEC and uses programming based upon NAA (National Afterschool Association) Standards for Quality School Age Care. During summer months the School Age Child Care program provides Summer Program all day, serving approximately 300 children ages 5-14. The Summer Program provides a safe, educational environment for children, including educationally based field trips to a variety of museums and historical landmarks, literacy programs, environmental awareness activities, and a health and wellness curriculum.

Two of our child care centers, a Pre-school program and an After School program are presently housed in the Orient Heights Public Housing that is slated to be demolished in the near future. This means that the children we serve in those 2 programs will be displaced and will need to be housed elsewhere. While we work on a temporary solution to this issue, we are looking to the future with the hope of returning child care services to the Orient Heights area. A Child Care Center in the HYM development would be the ideal location for the East Boston Social Centers to provide the necessary high quality child care services for the Orient Heights area and hopefully for the many families that will be housed in the Suffolk Downs project.

Thank you for your consideration of this request.

All the best,

Marisa

Marisa Di Pietro

Development Director

East Boston Social Centers

68 Central Square

East Boston, MA 02128

(Office) [REDACTED]

(Cell) [REDACTED]

[REDACTED]



East Boston Social Centers, Inc.

Celebrating 100 years of service to the community

1918 ~2018



Tim Czerwienski <tim.czerwienski@boston.gov>

Final Comments

Roberta Marchi [REDACTED]

Fri, Feb 2, 2018 at 5:57 PM

To: Tim Czerwienski <tim.czerwienski@boston.gov>

Cc: rob Marchi [REDACTED], Gail Miller [REDACTED], Kevin J Farrell [REDACTED],
[REDACTED], Chri Marchi [REDACTED], Mary Welch [REDACTED]

Hi Tim,

Here is my final comment about the HYM plan. I feel somewhat like we are buying a "Pig in a Poke". Only because here at the last moment we still have no scale model to actually see the relative size and height of the buildings that are being built on the Suffolk site. I am very disappointed about that because I would have expected a model such as the one done by the Suffolk Downs developers with the casino had provided for the community.

HYM seems to have lots of experience in these projects, so I can't understand their sluggish response to the request for a model.

I am somewhat concerned about the height of the phase one buildings at Suffolk Downs station. It seems a bit disingenuous of HYM to tell us that the two "Amazon" buildings would be 7 stories high, while at the same time requesting a zoning waiver to build "buildings" up to 125 feet. My first thought was that these would be "other" buildings, not the two that residents who live on the hill like Joe Arangio were concerned about. Now, I understand that these two huge buildings might go up to 125 feet or more. This is of some concern.

As far as the open spaces and saving of the several water features and the resiliency measures of raising the base of the structures, saving rainwater, etc. are great. I just feel uncomfortable about the transparency of this process without a real scale model for everyone to see and compare the heights of buildings with the scale of the project and the land and water features. If some features need to be changed or moved about, that's understandable. I believe that HYM will bring us an attractive whole, but I also feel that some information has been presented in a manner that is amateurish and misleading. I understand that this is a very big investment for HYM, both of time and money. I know they need an anchor company that is big enough to attract the necessary kinds of accessory businesses and people to make the project a success. I can understand the anxiety to make the site as attractive to business enterprises as possible, but it should be a good site for local people to use and for neighborhood folks to live with as well. We are putting a great deal of trust in HYM's partners and in their good intentions toward our neighborhood.

Thanks for the chance to comment on this.

Roberta Marchi



Tim Czerwienski <tim.czerwienski@boston.gov>

Comments re Suffolk Downs Masterplan

Gail Miller [REDACTED]
To: Tim.Czerwienski@boston.gov

Fri, Feb 2, 2018 at 9:33 PM

BP&DA
Attn: Tim Czerwienski
City Hall
Boston, MA

Re: Suffolk Downs Master Plan Comments

I begin writing by commenting on the fact that this process for permitting and public meetings coinciding with so many moving parts has been difficult to follow. It seems the information changes swiftly and it is difficult to know if the information was noted in the large document or whether some details within the project came to light on and after. For instance, I know I went to a meeting where the height of the two Amazon buildings was described as being 6-7 stories and shadows were questioned. Several days later, an article appeared in the East Boston Times highlighting the fact that HYM was requesting a height variance to 120 feet for this PHASE 1 buildout. Surely this was known before the meeting. I AM OPPOSED TO ANY BUILDINGS THIS HEIGHT ON THE BACKYARDS OF THE NEIGHBORS EVEN IF IT IS 1500 FEET AWAY (AND BY WHAT MEASURE?).

The process has been made more confusing because there is also the request for a waiver from the usual environmental review before a project goes forward. We need Philadelphia lawyers to read the fine print.

Then on the back of the Article 53 height variance process comes the meeting next Wednesday at the Conservation Commission.

The community should have the true benefit of a consultant to guide folks through this project, particularly because it is getting rolled out over about 15 years. Hard to project impacts looking so far ahead.

A request was made for a model so we might gauge better what the site will look like somewhat...hard to appreciate the buildout otherwise. Not certain when the model will be available.

I am personally concerned about what the 40 acres of open space entails...is it just the existing wetlands, it is decks, is it walkways, etc. No opportunity to really discuss same but yet we are asked to comment on it.

The same is true for all other features of the proposal. Concerns for resiliency and future storm events were not talked about in any details so that the public have a certain level of buy in and understanding.

Before something goes forward for permits, it should be discussed with the communities what those permits are as the residents will be speaking to concerns as such.

I repeat, there are so many moving parts to this huge development that it is truly difficult to comment in this fashion.

Not having touched upon the impacts to Belle Isle Marsh which is of utmost concern, we have not had the opportunity to have a back and forth discussion to feel comfortable about protecting and enhancing this natural resource.

With all the community meetings, I have found that they are pretty much the same presentations but the concerns enclosed therein have not had the full vetting of residents.

I will continue to be concerned and hopefully will comment again shortly.

I will say, however, that it behooves the neighborhoods and the developer to attempt a win/win for this HYM proposal...I hope we can work together for the greater good.

Gail Miller
232 Orient Avenue
East Boston, MA 02128



Tim Czerwienski <tim.czerwienski@boston.gov>

Re: Suffolk Downs Comment Period, Upcoming Meetings

Skipdot54 [REDACTED]
To: tim.czerwienski@boston.gov

Fri, Feb 2, 2018 at 8:52 PM

Hi Tim,

I am overall very pleased with the presentations and discussions that Tom O'Brien and his group have conducted.

One of the concerns I have is to ensure that the height that Suffolk Downs will be asking for will not translate into other developers being able to utilize this in their presentations and state a precedent has been set so that they can get their projects at unreasonable heights.

In presentations I have been at there was no mention of trucking in soil to raise the level of the project and yet I saw that in a newspaper article. I was surprised that there was never any mention of this aspect of the project. Is there anything else that we may not be hearing about?

The other day I saw that Amazon was looking for water planes and that the city may have been working on this for years, prior to the Amazon bid. I just feel that with a project of this size we may not be getting all the information.

I am very concerned about safety and emergency services and I hope that East Boston will not be short changed and additional services will be negotiated for this project.

I wish that with all of the housing being proposed for this project that the mayor would be satisfied and stop the overdevelopment in East Boston and the deterioration of neighborhoods with oversized block buildings. This is an area where the development of various types of housing and businesses works.

I am very pleased with the percentage of green space in this project and I do hope that they will have a shell entertainment area to replace the one that we lost when Wood Island was taken by the airport.

As a resident I am extremely worried about the traffic on the highway and I hope that some mitigation can improve the already unacceptable roadway traffic and congestion.

We do need to look at additional schools in East Boston to manage the number of housing units and hopefully families that will move to this development. It is difficult for neighborhood families to get their children in local schools as it is.

Lastly the Blue Line is in need of much attention and since this project will depend on it at Beachmont and Suffolk Downs I hope improvements can happen to improve the current over crowded trains.

Thank you for listening,
Skip

-----Original Message-----

From: Tim Czerwienski <tim.czerwienski@boston.gov>

To: undisclosed-recipients;

Sent: Fri, Feb 2, 2018 10:19 am

Subject: Suffolk Downs Comment Period, Upcoming Meetings

Good morning,

This message is a reminder that the comment period for the first stage of review for the Suffolk Downs Master Plan project ends at midnight tonight. You can email your comments directly to me, or submit them through the form at the bottom of this site: <http://www.bostonplans.org/projects/development-projects/suffolk-downs>

The Zoning Commission will be holding a hearing on the proposed text amendment to Article 53 to enable increased height for the Phase 1 project on February 7. That meeting starts at 9AM and will be held in the BPDA Board Room on the 9th Floor of City Hall.

A public hearing before the BPDA Board for the Phase 1 project will take place on Thursday, February 8. The hearing is scheduled to begin at 5:40PM, and will take place in the BPDA Board Room on the 9th Floor of City Hall.

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BPDA_Identity_RGB_Hor_Pri_DB.png

Tim Czerwienski, AICP

2/5/2018

City of Boston Mail - Re: Suffolk Downs Comment Period, Upcoming Meetings

Project Manager

617.918.5303

Boston Planning & Development Agency (BPDA)

One City Hall Square | Boston, MA 02201

bostonplans.org



Tim Czerwienski <tim.czerwienski@boston.gov>

Suffolk Downs Masterplan comments

Kannan Thiru [REDACTED]
To: Tim Czerwienski <tim.czerwienski@boston.gov>

Fri, Feb 2, 2018 at 11:25 PM

Hi Tim,

I am excited about the opportunity of a 21st century model development. I'd like to be sure that the development is happening with full involvement of the city's Environment department (given the goals that pertain to Climate Readiness and Carbon Neutrality) and the state's Energy department. I'd also like to see a list of all impacts (type and extent), both short and long term, both positive and negative, on the community around. That will help us work together on mitigation, with confidence.

Thank you.

--

Kannan Thiruvengadam
Host, [Zumix Radio](#)
Director, [Eastie Farm](#)
Director, [JP Green House](#)



February 1, 2018

Tim Czerwienski, Project Manager
Boston Planning & Development Agency
One City Hall Square
Boston, MA 02201

Subject: Suffolk Downs Redevelopment/Expanded PNF-ENF

Dear Mr. Czerwienski:

I enthusiastically support the proposed redevelopment of Suffolk Downs as described in HYM's Expanded PNF-ENF, dated November 30, 2017, specifically the Proposed Master Plan Project Program and the Proposed Phase 1 Project Program. I have lived nearby to Suffolk Downs for my entire life, including a twelve-year period on Faywood Avenue in East Boston directly overlooking the site.

During my tenure as Boston Transportation Commissioner I was responsible for evaluating many large scale, multi-use development proposals for compatibility with adjoining neighborhood traffic systems, regional highways and associated public transportation systems. The HYM proposal for Suffolk Downs meets or exceeds every transportation project evaluation criteria for such compatibilities and should be approved on that basis alone. I have analyzed the complete HYM-PNF/ENF and agree with its conclusions in regard to projected trip generation data based on ITE models, which demonstrate that the project will generate moderate levels of additional traffic which can be largely mitigated with standard traffic enhancement programs such as signal synchronization systems. The most important traffic assessment consideration for the Suffolk Downs site is that *any* 161-acre site in a dense urban location will inevitably generate additional development related traffic levels, so that a critical benefit/cost consideration of the HYM Suffolk Downs proposal is its comparison with other possible development concepts, all of which would generate additional traffic over existing levels without the magnificent community benefits uniquely associated with the HYM proposal.

Suffolk Downs has been the subject of many development proposals over time, all of which have been controversial from a neighboring community viewpoint, primarily East Boston and Revere. For example, in 2000 the then Suffolk Downs owner was considering developing the site into a huge air cargo facility to be linked with Logan Airport, a proposal that generated a firestorm of community opposition (see following). As long as Suffolk Downs remains essentially a vacant 161 acre parcel it will always be susceptible to development options with onerous adjoining community implications. I fully support the HYM Suffolk Downs proposal not only because of its substantial intrinsic community benefits but also because of the ultimate protection it affords

the surrounding communities of East Boston and Revere from any development antithetical to their aspirations.

Among the many HYM/Suffolk Downs proposal attributes which I appreciate:

1. The commitment to redevelopment the Suffolk Downs and Beachmont Blue Line Stations to serve as primary transportation sources for not only the Suffolk Downs development but also the East Boston and Revere communities.
2. The creation of 40 acres of public open space from existing restricted areas to represent about one fourth of the total new site, to include connectivity between East Boston and Revere, an amphitheater and many plazas and playgrounds.
3. The provision of much needed housing for the area, including nearly 1,000 affordable housing units.
4. The creation of thousands of valuable jobs, both near and long term.
5. Substantial investments in and enhanced connections to the region's extensive public open space network such as the Belle Isle Marsh, Revere Beach, Constitution Beach, East Boston Greenway, et al.

I strongly support HYM's proposed Phase 1 Project Program because of its critical importance to the success of the vitally important Boston/Revere bid for the Amazon HQ2 and its huge benefits to the entire greater Boston metropolitan area's economy. I urge Boston, Revere and the Commonwealth to approve all required environmental and other permits to allow the Phase I Project Program to proceed expeditiously. The Phase 1 site for the proposed Amazon buildings and parking is ideally suited for its proximity to the under-utilized Suffolk Downs Blue Line Station and connectivity to the main site roadway system.

Thank you,

John Vitagliano

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Arts in the Park: Sunday, September 17
(rain date: Sunday, September 24)

Belle Isle News

Published by Friends of Belle Isle Marsh

Number 61

Summer 2000

LOGAN NORTH—IS THIS OUR FUTURE?

On the heels of their Chapter 91 defeat, Suffolk Downs began circulating a marketing prospectus for the Logan North Cargo Center to potential tenants. (See *What is Chapter 91? on page 3.*) The proposed facility will be built on

a portion of Suffolk Downs. (See *picture below*). The prospectus gives the impression that the facility will be built soon.

The owners of Suffolk Downs are negotiating with MassPort to build this air cargo facility. It is believed

that with the removal of the air freight facility at Logan Airport for the planned Runway 14/32, a relocation plan for air cargo distribution was necessary.

Suffolk Downs and Chapter 91

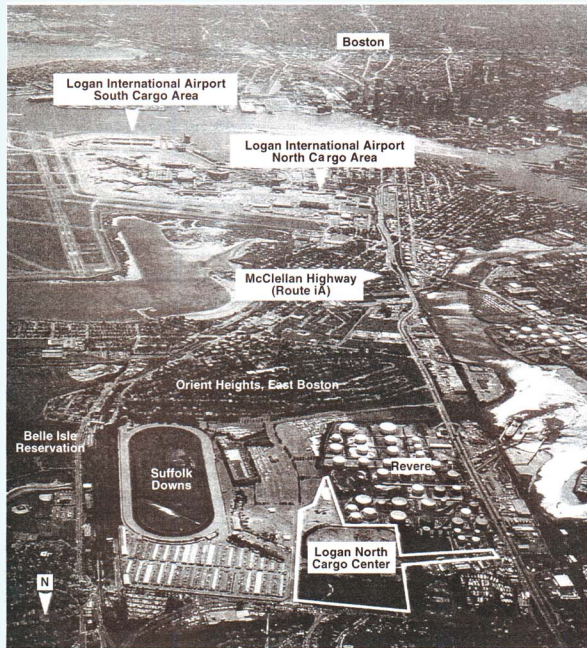
During the past several years, Suffolk Downs racing revenues have been declining. The track owners have been looking around for new sources of revenue. They have found an all-too-willing Daddy Warbucks, MassPort.

Earlier this year, Suffolk Downs tried to push through an amendment to the transportation bond bill to exempt itself from Chapter 91 oversight. (See *East Boston Transcript*, February 9, 2000, page 3.) Representative Anthony Petrucilli (D-East Boston) had the amendment removed from the bill.

The exemption to Chapter 91 that Suffolk Downs offered was:

The tracts...which are located west of Bennington St. and east of...Route 1A, and which are filled or otherwise reclaimed on or before January 1, 1960, shall be declared "landlocked." (This is all of Suffolk Downs.)

From the information that has been



Continued on page 2

Logan North—Our Future? *(continued from page 1)*

revealed to date, the reason that Suffolk Downs was seeking a Chapter 91 exemption was to accommodate MassPort.

To land-hungry MassPort the almost 200 acres of Suffolk Downs is manna from heaven. The mutual desperation of the two parties makes for a potential nightmare for Revere and East Boston.

Park and Fly

For the past several years, MassPort and Suffolk Downs have had an informal understanding that Suffolk Downs would serve as an emergency overflow parking facility. To date the arrangement has not been used often. Now however, there are plans to develop a 2,000 car Park and Fly operation.

Currently both East Boston and Revere zoning for the race track prevent this type of thing from happening. However, a financially strapped Revere might waver providing there is enough of an incentive, despite the strenuous opposition of Mayor Ambrosino.

Should this project ever gather steam, it would trigger a number of reviews by several environmental agencies. These reviews could bury the project. However, Suffolk Downs is slow to get the message. The principals believe that with help in strategic places they can bend the rules to suit their purpose. And they might be right. If it weren't for the ever-vigilant eyes of local environmentalists, the Chapter 91 exemption plan might have succeeded.

Logan North

Quietly last year, Suffolk Downs and MassPort persuaded the City of Revere to issue all the necessary permits for the proposed air freight facility. Therefore, despite their Chapter 91 defeat, Suffolk Downs is moving forward with their plans.

Real estate developer Burgess, of Burgess Properties, has been contracted by Suffolk Downs to develop a massive air cargo facility similar to one proposed by Spaulding & Slye. This proposal will encompass 27 acres, 5 of which may be wetlands. The plan calls for four buildings ranging in size from 90,000 to 140,000 square feet, with parking

spaces for 500 cars, not to mention the volume of trucks entering and leaving the premises.

Should plans for the air cargo facility and the Park and Fly operation be knocked down, Suffolk Downs will find other projects that could be equally onerous. It is clearly time for a commission made up of all interested parties to decide on a positive use for Suffolk Downs.

CORRESPONDENCE

The following letter expresses our concerns about the collusion of MassPort and Suffolk Downs.

Dear Representative DeLeo,

The Friends of Belle Isle Marsh are increasingly concerned about MassPort plans to use Suffolk Downs as an overflow parking area next week during spring school vacation and at the end of the week during Easter holidays. This activity has numerous adverse environmental consequences, including additional vehicular air pollution for the Revere-East Boston area and more traffic congestion on Route 1A where gridlock is currently routine.

This is blatant airport expansion. Talking about "Logan North" makes MassPort's intentions only too obvious! During the last school vacation in February the Revere Building Department was stupendous in filing a cease-and-desist order against both Suffolk Downs and MassPort. MassPort backed away at that time, but in the last few weeks it is obvious with "Logan North" that their plans have changed.

Belle Isle Marsh is the closest neighbor to Suffolk Downs, as you know. With these massive environmental degradations, including the Suffolk Downs attempt a short while ago to circumvent Chapter 91 environmental oversight, open space will not survive and people will not be able to breathe out of doors.

Earth Day is on Saturday, April 22. Many people will be celebrating clean air and water while at the same time MassPort continues to destroy our clean air by polluting our communities. This has got to stop! Please help us with this situation.

*Eleanor Casey
President, Friends of Belle Isle Marsh*





Tim Czerwienski <tim.czerwienski@boston.gov>

Suffolk Downs Comment Period, Upcoming Meetings

Kathi Wyatt :) [REDACTED]
To: Tim Czerwienski <tim.czerwienski@boston.gov>

Fri, Feb 2, 2018 at 10:16 PM

I was talking to someone on the IAG today and she wanted to mention that it would be nice to have the land that would be between the abutter on Waldemar Ave and the development site be limited to residential building and/or a buffer zone of trees.

Thank you,
Kathi Wyatt, abutter
[17 Waldemar Ave.](#)

[Sent from Yahoo Mail for iPad](#)

[Quoted text hidden]