

**Boston Water and  
Sewer Commission**



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

December 14, 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) reviewed, the October 1, 2018, Draft Environmental Impact Report /Draft Project Impact Report (DEIR/DPIR) and the November 30, 2018 Response to Request for Additional Information (RRAI) for the Suffolk Downs redevelopment project located in East Boston. The Commission reviewed the Expanded Environmental Notification Form/ Expanded Project Notification Form (EENF/EPNF) for this project and submitted comments to the MEPA Office and the Boston Planning and Development Agency on January 4, 2018.

The DEIR/DPIR was prepared in response to the Certificate issued by the MEPA Office and the Scoping Determination issued by the BPDA refines the project since the original filing and presents greater detail of the proposed development. Significant changes to the project include, reduction of density by 300,000 sf., expansion of Belle Isle Square, addition of a small retail building, a new park along Waldermar Avenue and two new street.

Chapter 13 of the DEIR/DPIR provides the project proponents response to comments received on the EENF/EPNF during the public review period. The Commission's comment letter and the proponent's response is included in this chapter. The Commission reviewed the project proponent's response to each Commission comment and determined all comments were addressed to the satisfaction of the Commission.



The RRAI, requested by the MEPA Office, provides additional information to questions and comments made during the public comment period. The responses are generally related to project alternatives and environmental issues. Also, an updated version of the response to comments from Chapter 13 of the DEIR/DPIR is in Appendix A of the RRAI. The reply to the Commission's comment letter are the same as stated in the EENF/EPNF.

The changes to the project stated in the DEIR/DPIR do not alter the Commission's comment regarding the project. Therefore, the Commission's comments remain as stated in the January 4, 2018 letter.

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

# BOSTON

**Martin J. Walsh, Mayor**

December 17, 2018

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

RE: Suffolk Downs DEIR/DPIR; 525 McClellan Highway in East Boston

Dear Ms. Polhemus:

The Boston Parks and Recreation Department (BPRD) has reviewed the concurrent *Draft Environmental Impact Report* (DEIR) and the *Draft Project Impact Report* (DPIR) for the redevelopment of the Suffolk Downs site located at 525 McClellan Highway in East Boston. This site is adjacent to the Belle Isle Marsh Reservation which is protected public open space.

BPRD previously reviewed the *Expanded Environmental Notification Form* and the *Expanded Project Notification Form* (EENF/EPNF) in a letter dated February 2, 2018. Many issues in that letter remain open. Comments on the DEIR/DPIR are provided below.

## Summary

It is not clear how the open space acreage proposed for the project is being counted, how the investment is being valued, or how this open space will serve the active recreational needs of up to 10,000 households. Open space that is required, negotiated or proposed as mitigation for Article 80 or through the MEPA approval process as a public benefit should be quantified to ensure that it does not change with future amendments to the development plan.

A needs analysis should be completed based on the projected users of open space. It should estimate the demand for active recreational needs and quantify the open space provided onsite to accommodate those needs, as well to help meet the active recreation needs in East Boston. An impact assessment should be done to determine impacts to public open space and mitigation.

Open space for active recreation should be provided onsite, or in the form of a contribution commensurate to the scale of the development to the City's Fund for Parks, to be used for open space, improvements to existing public parks and climate resiliency in East Boston.

Open space that is required, negotiated or proposed as mitigation for Article 80 or MEPA approval as a public benefit should be transferred to public ownership or otherwise protected in perpetuity to ensure that it does not change with future amendments to the development plan.

Open space that is required, negotiated or proposed as mitigation for Article 80 or MEPA approval as a public benefit should be implemented in the first phase of development. This will provide the framework for development and ensure that the public benefit to the neighborhood of East Boston is realized in the near term and is not impacted by future amendments to the plan.



**Boston Parks and Recreation Department**

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

## **Development Program**

The proponent is seeking approval for a Planned Area Development (PDA) from the Boston Planning and Development Agency (BPDA) to allow for variances from existing zoning, and to establish the mitigation of impacts and contributions to offset the development program. The project will have a 15-20 year buildout, though the phasing has not been provided in detail.

The project site is a total of 161 acres with 109 acres in the neighborhood of East Boston, and 52 acres in the City of Revere. The plan consists of 16.5 million sf of development with 10.5 million sf in Boston, and includes a mix of commercial, residential, retail, and open space uses. The proponent is seeking flexibility in the final program to allow response to market forces over time.

The DEIR/DPIR does not provide an estimate of the number of residents or users. However, the infrastructure impacts and mitigation for water demand and sewage generation were based on 10,000 residential units. This could be roughly estimated at 10,000-40,000 residents. The submittal does not clearly provide the estimated number of employees, shoppers, or visitors.

## **Open Space**

Suffolk Downs is about 350' from the Belle Isle Marsh Reservation, a 241 acre protected public open space owned by the Department of Conservation and Recreation (DCR) and local municipalities. It is part of the 1000 acre Rumney Marshes Area of Critical Environmental Concern (ACEC) and is habitat to many plants and wildlife that are rare to the metropolitan area. The marsh is also important for climate resiliency as it can provide storage of flood water.

The DEIR/DPIR states a \$60 million investment will be made into 40 acres of publicly accessible open space. The conceptual open space plan includes passive use spaces such as a 15 acre central common, retail plazas at the two MBTA stations, an outdoor amphitheater, wetlands, playgrounds, several neighborhood scale open spaces, as well as an "active linear corridor" for pedestrian and bicycle use and dog runs. Since the EENF/EPNF, a small passive park along has been added on Waldemar Avenue near Orient Heights and a retail plaza was enlarged.

The DEIR/DPIR notes that the open space network is strategically designed to accommodate potential flooding impacts to the project associated with sea level rise. The project site includes a pond and other wetlands, and Sales Creek which connects the Revere watershed with the Belle Isle and Rumney Marshes. These wetland resources will be engineered for use as infrastructure for stormwater management to protect the project from climate change, and also as open space.

*It is not clear how the open space acreage is being counted, how the investment is being valued, or how this open space will serve the active recreational needs of up to 10,000 households. Open space that is required, negotiated or proposed as mitigation or as a public benefit should be quantified to ensure that it does not change with future amendments to the development plan.*

*The proponent should clarify how it is counting the acreage, type and use of open space; detail how the open space will meet or mitigate each of the following; and note whether the same acreage is fulfilling multiple roles as design features, regulated, mitigation or public benefit:*

- Open space as mitigation under M.G.L. Chapter 30 Section 61;
- Open space required under M.G.L. Chapter 91;
- Open space approved by the EOEAA Secretary as a Public Benefits Determination;
- Open space which serves the needs of the neighborhood as identified in the *Imagine Boston 2030* and the *Open Space and Recreation Plan*;
- Open space required by the underlying zoning;
- Open space mitigated for the Article 80 Planned Development Area in lieu of zoning;
- Open space which serves the active recreational needs of the users of the development;
- Open space which serves the passive recreational needs of the users of the development;
- Public realm space such as retail plazas; streets, sidewalks and parking areas;
- Open space intended to protect the project from coastal impacts of climate change; and
- Mitigation for impacts to existing public open space in the neighborhood; and

### **Needs Analysis and Impact Assessment**

*A needs analysis should be completed based on the projected users of open space. It should estimate the demand for active recreational needs and quantify the open space provided onsite to accommodate those needs, as well to help meet the active recreation needs in East Boston. An impact assessment should be done to determine impacts to public open space and mitigation.*

East Boston is currently underserved by public open space 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.<sup>1</sup> 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 Land and the City's *Open Space and Recreation Plan*.

The PDA for Suffolk Downs will add 16.5 million sf of development to the neighborhood with up to 10,000 households, which can be estimated to have up to 40,000 residents. The proponent should address how it is meeting and improving the above ratio and the public open space needs outlined in the City's *Imagine Boston 2030*, which includes the *Open Space and Recreation Plan*.

Constructing a new neighborhood on the edge of the city with limited access to other City amenities, requires a comprehensive approach to open space planning and design. BPRD has evaluated other Boston neighborhoods with about 10,000 housing units to determine the average quantity and diversity of recreational facilities that should be accommodated at a minimum within the open space system proposed for this site: *Three multi-use / soccer fields; three 60' ball fields; one 90' ball fields; four basketball courts; three tennis courts, and five playgrounds.*

A fully developed active recreation program can be accommodated within the 40 acre open space system proposed for this new neighborhood. Additional open space amenities should also be part of the facility planning, but generally demand a smaller footprint and thus are easier to integrate into the open space system further into the design process (i.e. community gardens, dog parks, fitness stations etc.). Passive parks, recreational trails, and civic spaces should also be part of the planning process to create a varied and cohesive open space system.

## **Public Benefits for Landlocked Tidelands**

Suffolk Downs is subject to the Landlocked Tidelands Legislation which 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 and to identify measures to avoid, minimize or mitigate any adverse impact to ensure rights set forth herein.

*Open space that is required, negotiated or proposed as mitigation for Article 80 or through the MEPA approval process and the EEOEA approval as a public benefit should be quantified to ensure that it does not change with future amendments to the development plan (PDA).*

## **Phasing of Open Space**

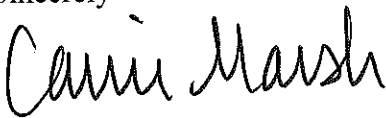
The project is proposed with a 15-20 year buildout. *Open space that is required, negotiated or proposed as mitigation for Article 80 or MEPA approval as a public benefit should be implemented in the first phase of development. This will ensure that the public benefit to East Boston is realized in the near term and is not impacted by future amendments to the plan.*

## **Protection in Perpetuity**

The open space proposed in the DEIR/DPIR will be publicly accessible but privately owned. *Open space that is required, negotiated or proposed as mitigation for Article 80 or MEPA approval as a public benefit should be transferred to public ownership or otherwise protected in perpetuity to ensure that it does not change with future amendments to the development plan.*

*Public open space may be managed privately.* 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 transferred to BPRD thereby ensuring permanent protection of the park. A long term agreement was created for the proponents to maintain and improve the park.

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  
Page Czepiga, Analyst, MEPA Office

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<sup>1</sup> 2011-2015 American Community Survey and the City of Boston GIS system



# CITY *of* BOSTON

Martin J. Walsh, Mayor

To: Tim Czerwienski, BPDA  
From: Zach Wassmouth, PWD  
Date: December 14, 2018  
Subject: Suffolk Downs DPIR - Boston Public Works Department Comments

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Included here are Boston Public Works Department comments for the Suffolk Downs DPIR.

**Site Plan:**

Developer must provide an engineer's site plan at an appropriate engineering scale that shows curb functionality on both sides of all streets that abut the property and within the project site.

**Construction Within The Public Way:**

All work within the public way (existing and proposed public streets) shall conform to Boston Public Works Department (PWD) standards. Any non-standard materials (i.e. pavers, landscaping, bike racks, etc.) proposed within a public way will require approval through the Public Improvement Commission (PIC) process and a fully executed License, Maintenance and Indemnification (LM&I) Agreement with the PIC.

**Sidewalks:**

Developer is responsible for the reconstruction of the existing sidewalks on all public ways abutting the project site and, wherever possible, to extend the limits to the nearest intersection to encourage and compliment pedestrian improvements and travel along all sidewalks within the Public Right of Way (ROW) within and beyond the project limits. The reconstruction effort also must meet current American's with Disabilities Act (ADA)/ Massachusetts Architectural Access Board (AAB) guidelines, including the installation of new or reconstruction of existing pedestrian ramps at all corners of all intersections. Plans showing the extents of the proposed sidewalk improvements associated with this project must be submitted to the PWD Engineering Division for review and approval.

The developer is encouraged to contact the City's Disabilities Commission to confirm compliant accessibility within the public right-of-way.

**Driveway Curb Cuts:**

Any proposed driveway curb cuts will need to be reviewed and approved by the PIC. The developer is also responsible for the closure of any existing driveway curb cuts abutting the property that are no longer serving active driveways.

**Discontinuances:**

Any and all discontinuances (sub-surface, surface or above surface) within the Public ROW must be processed through the PIC.

**Easements:**

Any and all easements associated with this project must be processed through the PIC.

**Landscaping:**

Developer must seek approval from the Chief Landscape Architect with the Parks and Recreation Department for all landscape elements within the Public ROW. Program must accompany a LM&I with the PIC.



**PUBLIC WORKS DEPARTMENT**

Boston City Hall • 1 City Hall Sq Rm 714 • Boston MA 02201-2024  
**CHRIS OSGOOD** • Chief of Streets, Transportation, and Sanitation  
Phone (617) 635-2854 • Fax (617) 635-7499



**Street Lighting:**

Developer must seek approval from the PWD Street Lighting Division, where needed, for all proposed street lighting to be installed by the developer in the public ROW, and must be consistent with the area lighting to provide a consistent urban design. The developer should coordinate with the PWD Street Lighting Division for an assessment of any street lighting upgrades that can be considered in conjunction with this project. All existing metal street light pull box covers within the limits of sidewalk construction to remain shall be replaced with new composite covers per PWD Street Lighting standards. Metal covers should remain for pull box covers in the roadway.

**Roadway:**

Based on the extent of construction activity, including utility connections and taps, the developer will be responsible for the full restoration of the roadway sections in the public ROW that immediately abut the property and, in some cases, to extend the limits of roadway restoration to the nearest intersection. A plan showing the extents and methods for roadway restoration shall be submitted to the PWD Engineering Division for review and approval.

**Project Coordination:**

All projects must be entered into the City of Boston Utility Coordination Software (COBUCS) to review for any conflicts with other proposed projects within the public right-of-way. The Developer must coordinate with any existing projects within the same limits and receive clearance from PWD before commencing work.

**Green Infrastructure:**

The Developer shall work with PWD and the Boston Water and Sewer Commission (BWSC) to determine appropriate methods of green infrastructure and/or stormwater management systems within the public right-of-way. The ongoing maintenance of such systems shall require an LM&I Agreement with the PIC.

**New Roadways:**

All new roadway shall conform to the Public Works Department's Roadway Design Standards and layout must be established and approved through the PIC.

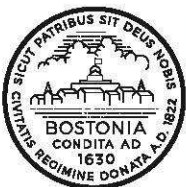
Please note that these are the general standard and somewhat specific PWD requirements applicable to every project, more detailed comments may follow and will be addressed during the PIC review process.

If you have any questions, please feel free to contact me at [zachary.wassmouth@boston.gov](mailto:zachary.wassmouth@boston.gov) or at 617-635-4953.

Sincerely,

**Zach Wassmouth**  
**Chief Design Engineer**  
Boston Public Works Department  
Engineering Division

CC: Para Jayasinghe, PWD



**PUBLIC WORKS DEPARTMENT**

Boston City Hall • 1 City Hall Sq Rm 714 • Boston MA 02201-2024

**CHRIS OSGOOD** • Chief of Streets, Transportation, and Sanitation

Phone (617) 635-2854 • Fax (617) 635-7499





November 13, 2018

Hello,

My name is Gabriela Boscio, Climate Program Manager at NOAH—the Neighborhood of Affordable Housing in East Boston. I'm here on behalf of NOAH, to congratulate the Impact Advisory Group and BPDA staff for taking the initiative to hear from the citizens of East Boston on both their needs and hopes for their community in relationship to the redevelopment of Suffolk Downs, particularly as it relates to climate protection and open space for East Boston residents. We wish the HYM team good luck on this significant venture and we urge dialogue to continue on climate protections even after the BDPA likely grants approval this winter.

The proposed 40+ acres of open space development, designed correctly, certainly can go a long way to helping make the area more resilient to the impacts of climate change, especially flooding. I would like to bring to your attention, however, other issues to consider.

As you may know, for the past several years, NOAH has been helping the neighborhood identify issues and concerns related to sea-level rise, flood protection, excessive heat, and increasingly, emergency preparedness. While we have not concentrated major efforts on Suffolk Downs because the Impact Advisory Group has jurisdiction, we do want to be on the record for a couple items related to community resiliency. Several of these emerged at our own Climate and Flood Protection meetings we held with the neighborhood in May and in September. We will be issuing a Community Report in January. Right now we have a couple questions:

1. Belle Isle Marsh is a major community asset. Any plans to protect the new Suffolk Downs must not harm this local biodiverse and open space treasure. We are certain you have thought about it but how can Suffolk Downs guarantee its plans will meet these criteria?
2. We have seen drafts which allude to a berm along Bennington St. with flood gates along Bennington St. that protect Suffolk Downs. Has Suffolk Downs or DEP analyzed those plans to see if they may harm Belle Isle Marsh?
3. We might agree the berm might be a very nice green asset to the community. Perhaps part of a bike or walking trail connected to Belle Isle Marsh and Suffolk Downs. If it is an asset to protect Suffolk Downs, can you tell us now if Suffolk Downs would be paying for this protective measure?



4. We know that there are thoughts about expanding the roadway on Rte 1. While we don't have comments on traffic, we do wonder what protections will be in place on the Chelsea Creek side so that the oil tanks do not become a hazard to the whole of East Boston? Sales Creek used to flow between the Creek and Belle Isle Marsh, so we are wondering where the rising waters go?
5. We don't have knowledge of how the housing within Suffolk Downs will be developed but we do wonder if you plan on raising it up so that it meets at least 2070 sea level rise projections? We are raising up our own housing along the Harbor and Chelsea Creek.
6. Will the community have access to any kayaking or canoeing opportunities on site?
7. Can NOAH youth participate with the HYM team in programming for these recreation, climate and open space areas?

Thank you for your time and efforts on this major redevelopment effort. Please keep us on your list of Climate and Resiliency plans.

On behalf of NOAH,

Gabriela A. Boscio Santos  
Climate Program Manager  
Neighborhood of Affordable Housing



13 de noviembre de 2018

Hola,

Me llamo Gabriela Boscio, Gerente del Programa Climático de NOAH (Neighborhood of Affordable Housing) en East Boston. Estoy aquí en nombre de NOAH, para felicitar al Grupo Asesor de Impacto y al personal del BPDA por tomar la iniciativa de escuchar a los ciudadanos de East Boston sobre sus necesidades y esperanzas para su comunidad en relación a la reurbanización de Suffolk Downs, particularmente en cuanto a la protección climática y el espacio abierto para los residentes de East Boston. Le deseamos mucha suerte al equipo de HYM en esta importante iniciativa y esperamos que el diálogo sobre protecciones climáticas continúe, incluso después de que el BPDA probablemente otorgue su aprobación este invierno.

Esta propuesta con más de 40 acres de espacios abiertos, diseñado correctamente, sin duda puede ayudar mucho a que el área sea más resistente a los impactos del cambio climático, especialmente a las inundaciones. Me gustaría dirigir su atención, sin embargo, a otras cuestiones a considerar.

Como sabrán, durante los últimos años, NOAH ha ayudado al vecindario a identificar problemas e inquietudes relacionadas con el aumento del nivel del mar, la protección contra inundaciones, el calor excesivo y, cada vez más, la preparación para situaciones de emergencia. Si bien no hemos concentrado esfuerzos significativos en Suffolk Downs debido a que el Grupo Asesor de Impacto tiene jurisdicción, sí queremos estar en el registro sobre un par de artículos relacionados con la resiliencia de la comunidad. Varios de estos surgieron en nuestras propias reuniones sobre el clima y la protección contra inundaciones que celebramos con el vecindario en mayo y en septiembre. Estaremos publicando un Informe Comunitario en enero. En este momento tenemos un par de preguntas:

1. Belle Isle Marsh es una parte importante de la comunidad. Cualquier plan para proteger a Suffolk Downs no debe dañar la biodiversidad local de este tesoro de espacios abiertos. Estamos seguros de que lo han pensado ya, pero ¿cómo puede Suffolk Downs garantizar que sus planes cumplan con estos criterios?
2. Hemos visto borradores que aluden a una berma a lo largo de Bennington St. con compuertas a lo largo de Bennington St. que protegen a Suffolk Downs. ¿Suffolk Downs o DEP analizaron esos planes para ver si pueden hacerle daño a Belle Isle Marsh?
3. Podríamos estar de acuerdo en que la berma podría ser una opción verde muy buena para la comunidad. Quizás como parte de una ciclo-vía o sendero para caminar conectado a Belle Isle Marsh y Suffolk Downs. Si es para proteger a Suffolk Downs, ¿puede decirnos ahora si Suffolk Downs pagaría por esta medida de protección?



4. Sabemos que se ha considerado la expansión de la carretera en la Ruta 1. Si bien no tenemos comentarios sobre el tráfico, nos preguntamos qué protecciones se implementarán en el lado de Chelsea Creek para que los tanques de petróleo no se conviertan en un peligro para todo el East Boston? Sales Creek solía fluir entre Chelsea Creek y Belle Isle Marsh, así que nos preguntamos a dónde irán las aguas a medida que vayan subiendo.
5. No tenemos conocimiento de cómo se desarrollarán las viviendas dentro de Suffolk Downs, pero nos preguntamos si planean elevarlas para que cumplan al menos con las proyecciones de aumento del nivel del mar para 2070. En NOAH, estamos levantando nuestras propias viviendas a lo largo del puerto y Chelsea Creek.
6. ¿Tendrá la comunidad acceso a oportunidades de kayak y el uso de canoas?
7. ¿Pueden los jóvenes de NOAH participar con el equipo de HYM en la programación para estas áreas de recreación y espacios abiertos?

Gracias por su tiempo y esfuerzo en este importante proyecto de redesarrollo. Por favor, consérvenos en su lista de planes de Clima y Resiliencia.

En nombre de NOAH,

Gabriela A. Boscio Santos  
Gerente del Programa Climático  
Neighborhood of Affordable Housing



Tim Czerwienski &lt;tim.czerwienski@boston.gov&gt;

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**Recommendation for Suffolk Downs Mitigation Compensation to the EB Community**

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Joseph Arangio Jr. [REDACTED]  
Reply-To: [REDACTED]  
To: Tim Czerwienski <tim.czerwienski@boston.gov>

Wed, Dec 12, 2018 at 10:51 AM

[REDACTED]  
<jarangiojr@yahoo.com>

Dear Tim,

I submit this email as my letter suggesting appropriate mitigation.

I will be brief.

I am recommending that mitigation compensation to the Orient Heights neighborhood and the East Boston community, as a consequence of the Suffolk Downs Redevelopment Project, consider the following:

- (a) Shade tree planting on major streets (e.g., Bennington, Saratoga) from one end of the district to the other end, as well as in squares (Orient Heights, Day, etc.) and Constitution Beach
- (b) Street/road beautification efforts (e.g., extensive and more dense use of flowers and planters) along major streets, squares, intersections (e.g., Leyden, Bennington, Walley) and Constitution Beach.
- (c) An upkeep and maintenance effort for all plantings.

Should this recommendation progress further, I believe the Suffolk Downs IAG can work with you, the developers and relevant staffs to identify the details that would become part of an implementation plan.

In support, I respectfully submit a quoted paragraph from a June 10, 2018 article written by David Abel and published on pages A1 and A12 in the Boston Globe. It speaks to the inadequate tree canopy in Boston.

"To cast light on the problem...[lack of tree canopy in Boston], City Counselors Ayanna Pressley and Matt O'Malley...plan to urge officials to do more to improve the city's canopy and to distribute trees more equitably. 'There's a greater density of trees in some neighborhoods than others,' Pressley said. 'In some of the neighborhoods most vulnerable to climate change, where we need them, we don't have them.' She pointed to East Boston, where only 7 percent of the neighborhood has trees planted, according to the city's most recent report on tree canopy."

Sincerely,

Joseph Arangio Jr.,  
IAG Member, Suffolk Downs Redevelopment Project

December 12, 2018

Tim Czerwienski  
Project Manager  
Boston Planning & Development Agency  
One City Hall Square, 9<sup>th</sup> Floor  
Boston, MA 02201

Dear Mr. Czerwienski:

I am writing to express my strong support for the HYM / Suffolk Downs Redevelopment project. The proposed project will redevelop the former Suffolk Downs racetrack into a new vibrant community. This new community will include new housing (including affordable housing) as well as commercial development & a beautiful 40 acre public park network. The proposed housing will include apartments, townhouses, senior housing and condos.

HYM has done extensive outreach in East Boston & the process has been very transparent.

Overall, I support the redevelopment of the Suffolk Downs site and look forward to it becoming part of East Boston.

Thank you for your consideration.

Sincerely Yours,

Jim Kearney

President-Elect, East Boston Chamber of Commerce

December 12, 2018

Tim Czerwienski  
Project Manager  
Boston Planning & Development Agency  
One City Hall Square, 9<sup>th</sup> Floor  
Boston, MA 02201

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Thank you for your consideration.

Sincerely Yours,

A handwritten signature in black ink, appearing to read 'Pat Todisco', with a long horizontal flourish extending to the right.

Pat Todisco

December 15, 2018

Tim Czerwienski  
Project Manager  
Boston Planning & Development Agency  
One City Hall Square, 9<sup>th</sup> Floor  
Boston, MA 02201

Dear Mr. Czerwienski:

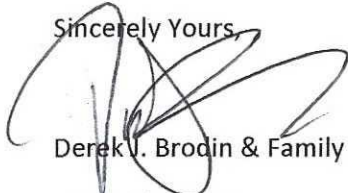
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Overall, I support the redevelopment of the Suffolk Downs site and look forward to it becoming part of East Boston.

Thank you for your consideration.

Sincerely Yours,

A handwritten signature in black ink, appearing to read "Derek V. Brodin", is written over the typed name. The signature is stylized and somewhat cursive.

Derek V. Brodin & Family  
69 Waldemar Avenue  
East Boston, MA 02128





Tim Czerwienski &lt;tim.czerwienski@boston.gov&gt;

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## IAG Member Comment

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Ernani DeAraujo <[REDACTED]>  
To: "Tim Czerwienski (tim.czerwienski@boston.gov)" <tim.czerwienski@boston.gov>

Thu, Dec 13, 2018 at 2:54 PM

Dear Tim:

I write this note in continued support of the proposal by HYM Investments for the development of the former Suffolk Downs site. A few additional notes to add to my previous comments around mitigation:

**Housing:** HYM has committed to build thousands of new homes to meet the desperate housing shortage in greater Boston. They should continue to work toward developing lower cost and affordable options beyond the 13% dedicated affordable. In particular, they should consider a range of lower cost, lower amenity options such as micro units, rooming houses, and other alternative/flexible living arrangements to provide lower rent market options for a broader range of users. Moreover, they should commit to increase the amount of handicap accessible units throughout their development. Individuals with physical and mental disabilities have very few options for adaptable living spaces and HYM could help address this issue with their affordable and market units.

**Flexibility/Community Input:** Whatever initial plans are approved, there should be flexibility in the 20 year expected development time frame to revisit aspects of the plan for community input. The East Boston community went through a substantial planning effort for our waterfront in the late 1990s and by the time the economy permitted construction (over a decade later), certain aspects of the planning did not reflect the needs or preferences of the new community. I understand that each phase of the development will have its own detailed process and this will enable timely input to ensure that future changes in living patterns, transportation, public health, etc. can be reflected as this private development grows.

Thank you for your consideration,

Ernani Jose DeAraujo

68B Horace Street

December 13, 2018

Matthew A. Beaton, Secretary of Energy and Environmental Affairs  
Executive Office of Energy and Environmental Affairs (EEA)  
Attn: MEPA Office  
100 Cambridge Street, Suite 900  
Boston, MA 02114

Brian Golden, Director  
Boston Planning and Development Agency  
Boston City Hall  
Boston, MA 02201

From: LivableStreets Alliance  
Re: Suffolk Downs Draft Environmental Impact Report

DEIR:

Volume 1: <http://www.bostonplans.org/getattachment/11089669-d1f5-458a-9e50-9da28b620344>

Volume 2: <http://www.bostonplans.org/getattachment/d34605b5-4dea-4898-a232-b356501dbaf9>

Dear Secretary Beaton and Director Golden,

Thank you for welcoming comments on the Draft Environmental Impact Report for the Suffolk Downs Redevelopment. LivableStreets sees this site as essential to the promotion of our three key initiatives: Vision Zero, Better Buses, and the Emerald Network. We believe that a site of this magnitude provides an immense opportunity for the State of Massachusetts and the City of Boston to lead the way on progressive planning and design that meets state and municipal goals on sustainability, climate resiliency, and equitable development.

Given the scale of this site (161 acres), we believe that the proponent's overall site design will help integrate this large parcel into the surrounding neighborhoods by establishing a new street network between and around buildings that encourages mobility and livability at an appropriate scale. The inclusion of a network of dedicated spaces for cyclists and pedestrians to maneuver around the site reflects a commitment to building an inclusive and people-centered space. In certain circumstances, the proponent has included traditional on-road bike lanes and we would encourage you to consider the breadth of benefits those spaces would better serve as protected bike lanes. We are also supportive of the inclusion of new Bluebikes stations throughout the site as a means of encouraging mode shift towards sustainable transportation and expansion of a well-utilized existing system.

We are excited to see that the proponent will be investing over \$60 million into the creation of a 40-acre publicly accessible open space system that includes both active and passive recreation areas and floodable wetlands. We believe that this will provide both environmental and quality-of-life benefits to the surrounding communities. We are especially excited to see a commitment to building out a 20' community path between Constitution Beach and Revere Beach, a segment that is outlined as a

connection in our Emerald Network Initiative, a vision to build 200-plus miles of connected greenways in Greater Boston.

Alongside our support for these transportation considerations, we would also like to express concern about the following, which we hope the proponent will respond to before the Final Environmental Impact Report:

## **Parking**

While we are supportive of monitoring parking demand over the course of the project build-out, we believe that construction of initial parking induces demand and skews parking demand figures by giving the impression that parking is widely available on-site. Any action that creates an oversupply of parking and induces demand for personal vehicles is in direct opposition to the goals of TOD, climate resiliency, and mode shift away from driving personal vehicles.

The proponent is proposing 15,250 parking spaces for this site, mostly in structured garages. This number includes the 6,620 parking spaces required by the City of Revere parking ratios, but the remaining 8,630 parking spaces exceeds the number proposed under the City of Boston parking ratios. The proponent is requesting maximum parking ratios for office/lab that are twice the ratio the City of Boston proposed for this site. The proponent suggests that meeting the lower parking ratios would be “difficult,” but provides no explanation for why this would be difficult in a TOD site uniquely served by existing transit.

Also included in the proposed 15,250 parking spaces are 557 on-street parking spaces, which the proponent identifies as free time-limited spaces. We question the choice to make these spaces free as opposed to metered, which would provide revenue to the municipalities and have the potential to encourage greater parking turnover rates.

We are concerned that advantages provided by creating people-centered open space and recreational spaces within the site will have reduced benefit and impact if the site is built to accommodate and encourage a plethora of personal vehicles.

## **Public Transportation**

The proponent proposes operating a privately owned but publicly accessible shuttle service, running shuttles on a loop within the site as well as between the site and North Station, South Station, Chelsea Station, and the Seaport. While this is a generous suggestion and acknowledges shortcomings in the existing MBTA service, we believe this agreement needs further clarification in terms of how often these services would run, how many years the proponent commits to operating these services, and how accessibility and seamlessness within the MBTA systems will be ensured.

While we are happy to see the proponent offering over \$50 million in off-site traffic mitigation measures, those mitigation measures seem to demonstrate little benefit in the 2038 build scenario based on intersection LOS and vehicle delay times. Even with the 2038 build conditions with mitigation, the proponent acknowledges that all bus routes will have increased delay times and the 119 bus will have times during the day when it exceeds the policy capacity and at times exceeds the crush capacity.

The proponent further acknowledges that in the 2038 build condition, they expect public transit use of 39%; however, the Go Boston 2030 goal for increased transit ridership is 44%. Similarly, the 2038 build condition expects single occupancy vehicle use of 35%; however, the Go Boston 2030 goal is to reduce single occupancy vehicle use to 20%.

Given the acknowledged reduction in LOS for MBTA bus riders and the projection of not meeting Go Boston 2030 goals even eight years after the goal deadline, we encourage the proponent to return to the drawing board alongside the City of Boston, MassDOT, and the MBTA to consider how this site can be a better TOD site that meets state and municipal goals for mode shift and climate resiliency. We encourage the proponent to consider direct investments in the MBTA Blue Line to maintain the LOS at an A at both Suffolk Downs and Beachmont Stations. We also encourage the proponent to consider targeted investments in East/West transit options including increased bus services and bus priority lanes. Finally, we encourage the proponent to work alongside the City of Revere and the MBTA to consider the construction of a previously proposed commuter rail station along the Rockport Line.

## **Environment/Housing**

In solidarity with several of our community partners and with an understanding of the intricate link between transportation, housing, the natural environment, public health, and urban livability, we ask that the proponent consider the following:

On a site this large and served by transit and emerging jobs we think it should be a priority for the region that this site include more than the City of Boston mandated 13% inclusionary affordable housing. In addition, we are concerned that the proponent has not considered the possibility of building the site as a microgrid, or considered the possibility of building out passive housing or net zero buildings. These types of equity, energy, and environmental concerns would establish this site as a unique cutting-edge development demonstrating the potential for future energy independent sites.

While we applaud the considerations for building connections from the site across Bennington Street to both Belle Isle Marsh and Constitution Beach, we encourage the proponent to give similar consideration to Chelsea Creek. The proponent's plans to reconstruct Route 1A as a "Super Street" are counter to encouraging access to Chelsea Creek and show a preference for expanding personal vehicle traffic which is counter to all of the region's climate and resiliency goals. We encourage the proponent to consider ways that the redesign of Route 1A can include safe and accessible crossings for pedestrians and cyclists that prioritize public access to potential future open space along Chelsea Creek. We are further concerned that the proposals for redesigned Bennington Street and Route 1A are not fully considering the impacts of sea level rise through design that elevates those edges and creates a truly resilient site.

Sincerely,

Tony Lechuga  
Emerald Network Program Manager | LivableStreets



December 13, 2018

Tim Czerwienski  
Project Manager  
Boston Planning and Development Agency  
One City Hall Square, 9<sup>th</sup> Floor  
Boston, MA 02201

Dear Mr. Czerwienski:

I strongly support the HYM/Suffolk Downs Redevelopment Project which holds enormous promise for enhancing the quality of life for East Boston by transforming the former Suffolk Downs racetrack into a new vibrant community which will include substantial new housing- including affordable housing, senior housing, condos and townhouses- as well as commercial development and a sublime forty-acre public park network.

HYM has been involved in an extensive and transparent project outreach program in East Boston, touching base with every conceivable neighborhood and social organization.

These new homes, businesses and parks would partially replace the thousands of homes, businesses and parks East Boston has lost to many huge projects such as Logan Airport, the Sumner/Callahan Tunnels and Route 1A.

The HYM/Suffolk Downs public park network would connect adjacent East Boston neighborhoods with bicycle paths and walkable streets and serve to provide enhanced connectivity to surrounding regional assets such as the East Boston Greenway, Belle Isle Marsh, Constitution Beach and Revere Beach.

The HYM Suffolk Downs Project would be a true Transit Oriented Development (TOD) community by capitalizing on its immediate proximity to both the Beachmont and Suffolk Downs MBTA Blue Line stations and inclusion of bicycle stations and walkways throughout the site to provide direct connections between the T stations and on-site businesses and residences. This TOD designation will maximize transit access to the entire site for employees and residents and minimize vehicular access.

The HYM/Suffolk Downs Redevelopment Project fully addresses current awareness and concern about the reality of sea-level rise by pro-actively planning for the effects of future climate change, storm surge, precipitation and extreme temperatures. Major portions of the project site will be raised and re-graded to provide protection against storm surge and potential sea level rise impacts. A network of open spaces will be strategically designed to accommodate potential flooding impacts associated with sea-level rise, and to provide further protection to the nearby buildings and areas outside the project site.

The HYM/ Suffolk Downs Project would also benefit East Boston because it would prevent, permanently, the development of Suffolk Downs' 161 acres for purposes detrimental to the best interests of East Boston.

Thank You,

*John Vitagliano*

Former Boston Transportation Department Commissioner and East Boston Resident



Tim Czerwienski &lt;tim.czerwienski@boston.gov&gt;

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**Letter of Support: HYM / Suffolk Downs Redevelopment project.**

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VROCC [REDACTED]  
To: tim.czerwienski@boston.gov, page.czepiga@state.ma.us

Thu, Dec 13, 2018 at 12:49 PM



Veronica Robles Cultural Center  
175 William F. McClellan Highway, East Boston, MA 02128  
[www.vrocc.org](http://www.vrocc.org) / (781) 558-5102

December 12, 2018

Tim Czerwienski  
Project Manager  
Boston Planning & Development Agency  
One [City Hall Square](#), 9<sup>th</sup> Floor  
Boston, MA 02201

Dear Mr. Czerwienski:

I am writing to express my strong support for the HYM / Suffolk Downs Redevelopment project. The proposed project will redevelop the former Suffolk Downs racetrack into a new vibrant community. This new community will include new housing (including affordable housing) as well as commercial development & a beautiful 40 acre public park network. The proposed housing will include apartments, townhouses, senior housing and condos.

I understand that HYM has done extensive outreach in East Boston & the process has been very transparent.

Overall, I support the redevelopment of the Suffolk Downs site and look forward to it becoming part of East Boston.

Thank you for your consideration.

Sincerely Yours,

Veronica Robles

Director and Co-Founder

**Veronica Robles**  
**Verónica Robles Cultural Center (VROCC)**  
175 McClellan Highway, East Boston, MA 02128  
P: (781) 558-5102  
E: [vroccboston@gmail.com](mailto:vroccboston@gmail.com)  
[Twitter/VroccBoston](#)  
[Instagram/VroccBoston](#)

12/13/2018

City of Boston Mail - Letter of Support: HYM / Suffolk Downs Redevelopment project.

[Facebook/Veronica Robles Cultural Center](#)



Tim Czerwienski &lt;tim.czerwienski@boston.gov&gt;

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## Suffolk Downs Comment Letter

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Alex DeFronzo [REDACTED]

Fri, Dec 14, 2018 at 8:25 PM

To: Tim Czerwienski &lt;tim.czerwienski@boston.gov&gt;, "page.czepiga@mass.gov" &lt;page.czepiga@mass.gov&gt;

December 14, 2018

Dear Ms. Czepiga, Mr. Czerwienski, Secretary Beaton, and Director Golden,

Thank you for the opportunity to comment on HYM Investment's DPIR/DEIR filing for the Suffolk Downs Development Project. I support the development of a transit oriented, mixed-use project and ask you to consider the following comments related to their proposal.

### Urban Design/Open Space Network:

Active recreational areas should include soccer fields, basketball courts, and uses that reflect the recreational needs of East Boston's current 50,000 residents. Open spaces should be designed to feel welcoming to diverse users. Figures 3.38 and 3.39 in the proponent's filing do not look particularly diverse or welcoming – the proponent should be encouraged to program the Central Common with an actual lined soccer field with goals. The developer should avoid abundant passive recreation, expansive hardscapes, high fences, and other features that convey a message of exclusion.

The proponent's commitments in S. 3.7.2 to Blue Bikes stations, cycle tracks, bicycle storage, and simple bicycle repair stations are appreciated. The proponent should continue to work to increase offsite bicycle accessibility in their various vehicular traffic mitigation projects.

The proponent's modifications beyond S. 3.8.1 to further break the large blocks transitioning from the Orient Heights neighborhood are appreciated.

### Sustainability/Green Building:

Humans knowingly contribute to the acceleration of climate change. It is a crime against future generations. The proponent should build a model project that operates as a net-zero independent microgrid powered by 100% renewable energy produced on site. The proponent has stated that they "will not preclude the advancement toward net zero, as technology becomes available over the life span of the Master Plan Project." Technology to develop a net-zero project already exists and should be implemented. HYM has the opportunity to build a community in stark contrast to the farm of petroleum tanks abutting their site, and one that can serve as a positive example of sustainable development to the rest of the world.

HYM has proposed that the project will consist of a minimum of 5% LEED Platinum Buildings, a minimum of 75% LEED Gold Buildings, and a maximum of 20% LEED Silver Buildings. The proponent has also committed to the construction of 2 megawatts of photovoltaic (PV) power onsite.

The proponent should commit to covering all roof space viable for PV power with solar panels (more than the 20% of "solar-ready" roof space suggested in the filing), and any non PV-viable space with green roofs. "PV-Ready" is not enough; the proponent should commit to constructing solar arrays across all viable roof space.

The proponent also suggests that the use of PV precludes building-integrated turbines. It does not and both should be used. The proponent should also commit to producing 100% LEED Platinum Buildings, or whatever lower percentage necessary to achieve a net-zero project.

The proponent should commit to a specific number of electric vehicle charging stations. I suggest six per building onsite for a minimum of 288 spaces.



## Transportation

The on and off site circulator buses proposed by the developer should be electric.

The Central Transportation Planning Staff's Regional Travel Demand Model used as a benchmark by the proponent in the filing does not seem to accurately reflect peak use of the MBTA Blue Line. Residents experience inbound morning commutes between Maverick and Aquarium stations that exceed crush capacity. Riders wait for two or three cycles of trains before they are able to board in the 7:45 – 8:55 am weekday window. The proponent should work with the MBTA to increase Blue Line capacity as the development is constructed.

## Summary of Mitigation/Draft Section 61 Findings

East Boston continues to face 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, and the threat of rising sea level and severe weather events.

The proponent should exceed the Inclusionary Development Policy and construct 20% inclusionary housing in both the Boston and Revere parcels, with at least 18% on-site and linkage funds to remain in East Boston.

The proponent should include additional transit-directed traffic mitigation including a minimum \$15m commitment toward the construction of the Blue/Red line connector for the MBTA.

The proponent should commit to the creation of a perpetual community benefit fund supported by HYM to be managed by an open and transparent external charitable foundation. In the filing, the proponent stated "The Proponent expects additional benefits, such as the establishment of a community fund to be developed in close coordination with the IAG as part of the Article 80 review process." The establishment of a fund should be considered with the master plan, not on a building-by-building basis.

Thank you for considering these comments.

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### Alex DeFronzo

Executive Director  
Piers Park Sailing Center  
95 Marginal St.  
East Boston, MA 02128  
<http://piersparksailing.org>



#SailPPSC #SailEastie



Tim Czerwienski &lt;tim.czerwienski@boston.gov&gt;

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## Suffolk Downs Project

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**Diane DiGiacomo** [REDACTED]  
To: tim.czerwienski@boston.gov, pilawma@aol.com

Fri, Dec 14, 2018 at 3:55 PM

Tim,

I have some concerns that I would like to share with you. I attended the meeting the other night and saw the book that showed what the condos would look like along Waldemar Ave.

I have been a Waldemar Ave resident for 57 years. I was born and raised at this property.

Many meetings ago I was under the understanding that the townhouses would be built across from my property at 124. Now I see that there are mini Harbor Tower Buildings that have been proposed along this street. I do not want these tall buildings in the front of my property. We have mostly all low income housing up the street and I don't think its fair that we should have the low income units in front of our property. We will be surrounded by these units and our property value will DECREASE.

Also, I feel that there should be Political Representatives at these meetings to address the low income housing issue. Tom is a developer and purchased the property. I do not think that people understand that this project is a private entity.

My neighbors and I are very concerned about this project as we will be directly impacted by this nightmare.

Why hasn't the city conducted its own EPA study? I realize that the Developers conducted their own but as a tax payer I would like to see an independent study. I am a two time cancer survivor and Waldemar Ave residents have, had, and died of cancer.

We will be directly impacted with noise, air pollution, traffic etc. I feel that Waldemar Ave residents should meet with Tom separately without the public meetings. WE are directly effected more than the rest of the community who do not live on this street.

I have several questions that must be addressed to myself and my neighbors. I hope the city is addressing our concerns in a proper manner. I have friends who fought the Cowper Ave project and that developers wanted to build 40 condo units and because of the persistent neighbor that are now only going to develop eight.

I understand that there has been over 200 meetings that were held in the city but I feel that there is a huge part of the community that is unaware and under represented and do not have a clue about this project.

Thanks,

Diane DiGiacomo  
[124 Waldemar Ave, East Boston](#)  
[REDACTED]



December 14, 2018

Tim Czerwienski  
Project Manager  
Boston Planning & Development Agency  
One City Hall Square, 9<sup>th</sup> Floor  
Boston, MA 02201

Dear Mr. Czerwienski:

I am writing to express my strong support for the HYM / Suffolk Downs Redevelopment project. The proposed project will redevelop the former Suffolk Downs racetrack into a new vibrant community.

This new community will include new housing (including affordable housing) as well as commercial development & a beautiful 40-acre public park network. The proposed housing will include apartments, townhouses, senior housing and condos.

HYM has done extensive outreach in East Boston & the process has been very transparent. Overall, I support the redevelopment of the Suffolk Downs site and look forward to it becoming part of East Boston.

Thank you for your consideration.

Sincerely Yours,

Mirna Orellana  
Presidenta  
New England Salvadoran-American Day Foundation Inc. (509(c)(2) nonprofit)

**New England Salvadoran-American Day Foundation Inc.**

2 Neptune Road #416 East Boston MA 02128

Tel 617-650-7187 Fax 1-800-886-4530



## CITY OF REVERE

Brian M. Arrigo  
Mayor

December 14, 2018

Matthew Beaton, Secretary  
Executive Office of Energy and Environmental Affairs  
100 Cambridge Street 9<sup>th</sup> Floor  
Boston, MA 02112

ATT: Page Czepiga

RE: Project # 137601 -- Draft Environmental Impact Report/Draft Project Impact Report  
(DEIR/DPIR) for the Redevelopment of Suffolk Downs in Revere and East Boston

Dear Secretary Beaton,

On behalf of the City of Revere, we hereby express our full and unequivocal support for EOEEA approval of the 10.03.18 DEIR/DPIR for the redevelopment of Suffolk Downs. In our view, this document more than adequately identifies, fully evaluates and effectively addresses the beneficial and the potentially adverse environmental and other impacts of this project for the Revere and Boston communities and for the Commonwealth. We, therefore, do not recommend the need for any supplemental filings short of the DEIR/DPIR itself. Quite the contrary, we believe that any requirement for supplemental filings would unnecessarily delay the commencement of a project that has already received the overwhelming support of the Revere community as well as the planning and permitting approval of our elected and appointed public officials.

Our support reflects the many benefits that the redevelopment of Suffolk Downs brings to Revere and its residents, all of which are well described and fully committed to in the DEIR/DPIR itself. It will return to productive use more than 50 acres of our community that are currently vacant and unattractive. It will produce almost 6Msf of on-site development, including significant new residential, commercial, recreational and civic facilities, which will be integrated into a mixed-use urban neighborhood that will be an important new element of the larger Revere community. That mix of uses will be organized around an active and attractive system of fully publicly accessible open spaces, which will represent 25% of the development as a whole. And all of that will be linked by a network of streets, sidewalks and pathways that will be funded, built and maintained by the developer.

The complex will be serviced by a new state-of-the-art utilities grid and a new water and sewer network that will not over-burden our existing infrastructure and will also improve the environmental resiliency of the surrounding neighborhoods. Likewise, the traffic and transportation plans well outlined in the DEIR/DPIR will not only create a new multi-modal and transit-oriented community on-site, but they will at long last address and resolve in whole or in large part a number of major traffic circulation, congestion and capacity problems on the surrounding regional and local roadways that will be of immeasurable benefit to the Revere community and the region as a whole.

At our insistence, the proposed development of Suffolk Downs in Revere will also strike an equal balance between residential and commercial uses. Over the 15-20-year build-out of the project, the former will produce more than 2,500 new rental and ownership housing units for a variety of constituencies; and the latter will produce new retail, restaurant, hospitality, laboratory and office facilities, which importantly include a new hotel and innovation center in the first phase of development. By project completion, this mix of uses will have generated an estimated 7K construction jobs and 15K permanent jobs, in a Revere community whose employment base has been decimated by the recent closures of NECCO as well as the Wonderland dog-racing track and the Suffolk Downs horse-racing track itself. At full build-out, Suffolk Downs will generate \$43M of property taxes annually, more than half of Revere's current property tax collections and more than double our current commercial property tax collections. Those tax benefits will far out-weigh the project's municipal tax burdens, which are now conservatively estimated to be \$13M annually, less than one-third of estimated new tax revenues. In terms of economic and workforce development as well as municipal finance, the revitalization of the Suffolk Downs property is the answer to Revere's prayers; and it cannot come soon enough.

Beyond those substantive reasons for Revere endorsement of the DEIR/DPIR, there are any number of important procedural reasons to support that document since, in many respects, it emerged from an exemplary public process. It was the result of a continuing community-based collaboration in Revere that both informed its preparation and thoroughly vetted its findings and conclusions. That continuing process began informally during the due diligence period that preceded the purchase of the Suffolk Downs property by the HYM Investment Group in May of 2017; and thereafter it commenced officially with the collaborative preparation of a detailed zoning overlay district for the Revere portion of Suffolk Downs.

The Suffolk Downs Overlay District (SDOD) was approved by the Revere City Council in March of 2018 and is attached hereto for reference. This detailed document was informed by the collaborative nature of the Revere/Boston/HYM response to the Amazon Request for Proposals for a second headquarters site, which reflected and reinforced the cross-jurisdictional scope of the planning process for this crucial site. The SDOD established the basic development and public process parameters for permitting the Revere portion of the Suffolk Downs, zoning requirements that were then incorporated into the preparation of the Master Plan/Planned Unit Development (PUD) for Revere and the DEIR/DPIR for the whole site.

In May of 2018, and pursuant to the requirements of the SDOD, I convened a Project Review Board (PRB) composed of responsible City of Revere officials and a Development Advisory Group composed of a broad cross-section of the Revere community, to participate in the evolution and review of a Master Plan/PUD for Suffolk Downs in Revere, which would then be submitted to the Revere City Council for final approval. I also designated and retained a Peer Review Group (PRG) of experienced and expert consultants to provide professional input and feedback to the DAG and the PRB in fields that included environmental, engineering, urban design and architecture, traffic and transportation and legal matters. Issues and opportunities. The membership of these groups is attached hereto for reference.

The PRB and the DAG each met with the HYM development team in seven working sessions from June through October of 2018. Each of the DAG meetings was open to the press and the public, was recorded and broadcast by Revere TV, and was detailed and documented in meeting summaries and in the related audio-visual presentations that were and are available on the City of Revere and HYM websites. These meetings covered in a quite comprehensive and systematic manner all of the issues that would be also addressed in both the Suffolk Downs Master Plan/PUD and in the DEIR/DPIR. Those discussions informed the preparation of both of those documents as they evolved and were shared with the PRB, DAG and PRG in draft form. This series of working meetings was concluded with a final Community Meeting at the end of October, after which the Suffolk Downs Master Plan/PUD was recommended by the PRB and the DAG to the Revere City Council for its review and approval.

There followed a City Council Public Hearing on November 5<sup>th</sup>, in which overwhelming community support was expressed for both the Suffolk Downs Master Plan/PUD, which is attached hereto in summary form, and a related PRB Order of Conditions, which is also attached hereto for reference. The latter explicitly incorporated the community benefit and the project mitigation commitments that are included in both the Master Plan/PUD and the DEIR/DPIR. On that basis, the Revere City Council overwhelmingly approved the Suffolk Downs Master Plan/PUD as a Special Permit on November 26, 2018, thereby completing this critical stage of the project planning and permitting process in Revere.

In sum, the Suffolk Downs Master Plan/PUD was the outcome of a comprehensive, extensive and participatory public and community process that was firmly based on our assessment that the DEIR/DPIR was both adequate and acceptable and provided a reliable foundation at the state level for our approvals at the municipal level. Given this efficient and effective permitting outcome, HYM has now committed to begin the first phase of the Suffolk Downs redevelopment in Revere, and to commence construction before the end of 2019. That will bring to our community and to our residents the initial benefits of this major project on a predictable schedule that will take advantage the currently favorable business and market cycles. To reiterate, we are confident that the DEIR/DPIR as presented provides a more than adequate and acceptable basis for moving this project forward now and in full accord with EOEEA standards and oversight responsibilities. We also believe that additional supplemental filings are unnecessary and would likely significantly and unnecessarily delay the progress of this project, thereby delaying, and perhaps compromising, its benefits for Revere, Boston and the Commonwealth.

We, therefore, again emphasize the City of Revere's support for prompt and positive action by EOEEA action on the DEIR/DPIR for the Suffolk Downs Redevelopment. What is now before you for approval was the outcome of collaboration and coordination not only among Revere, Boston and HYM, but also with a series of state agencies, including DOT, CTPS, DHED, DCR, MBTA and EOEEA, with a variety of neighborhood, environmental, and transportation advocacy groups and organizations and through countless community meetings. In sum, this DEIR/DPIR was the product of an exemplary public and community process; and both the product and the process warrant EOEEA support and commendation.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian Arrigo". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Brian Arrigo, Mayor

cc: Governor Charlie Baker

Department of Transportation Secretary Stephanie Pollack

Department of Housing and Economic Development Secretary Jay Ash

Department of Conservation and Recreation Commissioner Leo Roy

MBTA General Manager Steve Poftak and Financial Management Board Chair Joseph Aiello

Boston Mayor Martin Walsh and Boston Planning & Development Authority Director Brian Golden

Members of the Suffolk Downs Project Review Board, Development Advisory Group, Peer Review Group

Members of the HYM Development Team

Members of the Revere City Council

December 14, 2018

Dear Ms. Czepiga, Mr. Czerwienski, Secretary Beaton, and Director Golden,

Thank you for the opportunity to comment on HYM Investment's DPIR/DEIR filing for the Suffolk Downs Development Project. I support the development of a transit oriented, mixed-use project and ask you to consider the following comments related to their proposal.

**Urban Design/Open Space Network:**

Active recreational areas should include soccer fields, basketball courts, and uses that reflect the recreational needs of East Boston's current 50,000 residents. Open spaces should be designed to feel welcoming to diverse users. Figures 3.38 and 3.39 in the proponent's filing do not look particularly diverse or welcoming – the proponent should be encouraged to program the Central Common with an actual lined soccer field with goals. The developer should avoid abundant passive recreation, expansive hardscapes, high fences, and other features that convey a message of exclusion.

The proponent's commitments in S. 3.7.2 to Blue Bikes stations, cycle tracks, bicycle storage, and simple bicycle repair stations are appreciated. The proponent should continue to work to increase offsite bicycle accessibility in their various vehicular traffic mitigation projects.

The proponent's modifications beyond S. 3.8.1 to further break the large blocks transitioning from the Orient Heights neighborhood are appreciated.

**Sustainability/Green Building:**

Humans knowingly contribute to the acceleration of climate change. It is a crime against future generations. The proponent should build a model project that operates as a net-zero independent microgrid powered by 100% renewable energy produced on site. The proponent has stated that they "will not preclude the advancement toward net zero, as technology becomes available over the life span of the Master Plan Project." Technology to develop a net-zero project already exists and should be implemented. HYM has the opportunity to build a community in stark contrast to the farm of petroleum tanks abutting their site, and one that can serve as a positive example of sustainable development to the rest of the world.

HYM has proposed that the project will consist of a minimum of 5% LEED Platinum Buildings, a minimum of 75% LEED Gold Buildings, and a maximum of 20% LEED Silver Buildings. The proponent has also committed to the construction of 2 megawatts of photovoltaic (PV) power onsite.

The proponent should commit to covering all roof space viable for PV power with solar panels (more than the 20% of "solar-ready" roof space suggested in the filing), and any non PV-viable space with green roofs. "PV-Ready" is not enough; the proponent should commit to constructing solar arrays across all viable roof space.

The proponent also suggests that the use of PV precludes building-integrated turbines. It does not and both should be used. The proponent should also commit to producing 100% LEED Platinum Buildings, or whatever lower percentage necessary to achieve a net-zero project.



The proponent should commit to a specific number of electric vehicle charging stations. I suggest six per building onsite for a minimum of 288 spaces.

### **Transportation**

The on and off site circulator buses proposed by the developer should be electric.

The Central Transportation Planning Staff's Regional Travel Demand Model used as a benchmark by the proponent in the filing does not seem to accurately reflect peak use of the MBTA Blue Line. Residents experience inbound morning commutes between Maverick and Aquarium stations that exceed crush capacity. Riders wait for two or three cycles of trains before they are able to board in the 7:45 – 8:55 am weekday window. The proponent should work with the MBTA to increase Blue Line capacity as the development is constructed.

### **Summary of Mitigation/Draft Section 61 Findings**

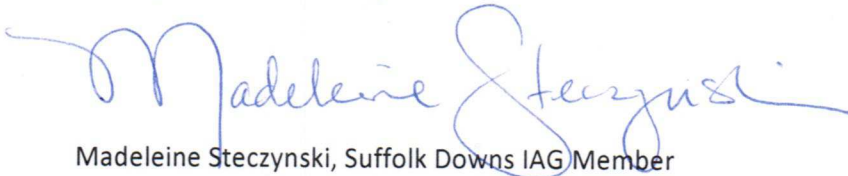
East Boston continues to face a number of community-wide challenges including a lack of affordable housing, displacement of families related to housing costs, traffic and congestion, 1,600 or more youth with no access to out-of-school programming, and the threat of rising sea level and severe weather events.

The proponent should exceed the Inclusionary Development Policy and construct 20% inclusionary housing in both the Boston and Revere parcels, with at least 18% on-site and linkage funds to remain in East Boston.

The proponent should include additional transit-directed traffic mitigation including a minimum \$15m commitment toward the construction of the Blue/Red line connector for the MBTA.

The proponent should commit to the creation of a perpetual community benefit fund supported by HYM to be managed by an open and transparent external charitable foundation. In the filing, the proponent stated "The Proponent expects additional benefits, such as the establishment of a community fund to be developed in close coordination with the IAG as part of the Article 80 review process." The establishment of a fund should be considered with the master plan, not on a building-by-building basis.

Thank you for considering these comments.



Madeleine Steczynski, Suffolk Downs IAG Member  
103 Webster Street  
East Boston, MA 02128



December 14, 2018

Matthew Beaton, Secretary  
Executive Office of Energy and Environmental Affairs (EEA)  
ATTN: MEPA Office  
100 Cambridge Street, Suite 900  
Boston MA 02114

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

RE: Comments on the DEIR/DPIR for the Suffolk Downs Project  
MEPA: #15783

Dear Secretary Beaton and Director Golden:

Thank you for the opportunity to review and comment on the Suffolk Downs project. We offer the following comments on the project's pedestrian environment, which overall is well addressed.

**The project offers generous walking opportunities**

The heart of the proposal is a 15-acre park – the Central Common – with walkways surrounding the site and connecting into and through the open space it provides. The Common has been designed as a one-mile running/walking loop. The park has water features with one pond that can be used for skating and another elongated pond that connects into the nearby saltwater Belle Isle Inlet. The Common connects on either end to meeting and performance spaces on plazas leading to the two Blue Line stations.

Main Street, a second north-south walkway, also connects Beachmont and Suffolk Downs Blue Line stations. This street will have wide, landscaped walkways with setbacks to allow for sidewalk cafes and other such uses along its route.

A third walkway, the Active Linear Corridor, parallels Main Street and runs midblock between Main Street and Tomasello Drive. This pedestrian-only street is intended to provide a series of active play spaces for all ages. The proposal is an extraordinary experiment – a half-mile long area that gives nearby space for casual and active uses. Figure 3.37 lists the potential uses of the corridor as active play, jumping mounds, rolling course, flex turf, climbing health, ping pong and jungle gym. Many of these are likely intended for children.

An additional north-south community trail skirts Tomasello Drive and is shown as a two-way bike facility that follows a swale on the side of the property facing the gas tanks, coupled with a sidewalk on the opposite side of the street.

There are several cross streets that connect the four north-south walkways. They vary in scale and importance. Several contain landscaped walkways and add to the many opportunities for walking throughout the project area.

One concern we ask the developer to address with respect to this generously scaled set of pedestrian ways and open spaces is that the play areas along the Active Linear Corridor (with the exception of the block near Waldemar Avenue) are located within blocks intended to be developed not for housing, but office uses, where presumably there will be few children in nearby buildings. As development occurs within the project, the proponents should ascertain if the proposed Active Linear Corridor is located appropriately to serve the intended users who may be living in residences on-site. Active recreational facilities for small children might be more appropriate lining the loop road at the eastern edge of the proposed Common. This route directly serves the three residential areas near the proposed Beachmont Plaza, the Belle Isle Plaza and the “Panhandle” near Route 1A. This route would strengthen the opportunities for residents to use the Common and its central meeting places as well.

### **East Boston Greenway extension**

WalkBoston encourages the proponents to seriously consider a connection to the East Boston Greenway. The existing East Boston Greenway ends at the Belle Isle Marsh, near the Suffolk Downs MBTA station but on the other side of Bennington Street from the station. There is a roadside path/sidewalk paralleling Bennington Street between the main entrance to the marsh reservation and the crosswalk to the Suffolk Downs transit station. This path is used two-way by both cyclists and pedestrians. Extending the path further north toward Revere Beach is not an easy task. The frontage of Bennington Street is spacious and possibly could be the location of an extended route until reaching Everard Street in Revere, where the Bennington route narrows down on the approach to the Beachmont station at Winthrop Avenue.

A potential alternative location for extending the East Boston Greenway that was suggested in the DEIR exists in the large tract of land between the MBTA rail tracks and the Suffolk Downs property line. This land is nearly 10 acres of unused space and has no buildings on it between the Suffolk Downs transit station and Washburn Avenue in Revere. Depending on ownership the tract might be made available. If owned by the MBTA, the property might become available to the developer, who could include a north-south path that would be available as a substitute for the Bennington Avenue route and link the property into the regional Greenway network as a principal route in the system.

### **Possible new walking connections into Orient Heights from the project site**

A decision has been reached with neighborhood residents that vehicular access between the project site and Orient Heights will not be provided. Several walking issues should be addressed to overcome this lack of street connection.

#### **1. Walley Street and the Suffolk Downs MBTA station**

Walley Street, just off Waldemar Avenue, is the current road and pedestrian access point to the Suffolk Downs transit station for Orient Heights residents. This approach currently works for all access to the neighborhood, and the proposed development adjacent to it respects existing neighborhood preferences and adds no vehicular access to the existing site. Instead the proposal adds a new access route for vehicles and shuttle buses to drop off transit-riders from the new development as close as possible to the transit station; this connection appears to be a part of the proposed Belle Isle Plaza. It is a bit unclear how this new connection will meet with existing streets and paths, and the developer, the City of Boston and the MBTA will need to coordinate the proposed new access with the existing street and path layout.

## 2. South project boundary – Waldemar Avenue

A community path along the full length of the south project boundary (approximately ½ mile long) connects the bus stop on Route 1A with the Suffolk Downs MBTA station at Walley Street. This is a good walking connection for East Boston/Orient Heights residents, as it provides connections to transit in two directions. From the Suffolk Downs station to a location about halfway between the MBTA station and Route 1A, an on-site road (also called Waldemar Avenue) parallels the path. It will be lined with small residential buildings backing onto the path. The Waldemar Avenue/Tomasello Drive intersection is well located to connect pedestrians into Orient Heights via the sidewalks of the Orient Heights public housing project and especially via Crestway Road, a short street that links to Faywood Avenue and directly to the Manassah Bradley School.

## 3. Safe walking access to schools

The proponents include no discussion or description of schools and safe routes to schools. For any students who are attending nearby schools, walking to school should be safe and convenient. The proponents of the project should work with both the City of Boston and the City of Revere to assure safe passage for all students living in Suffolk Downs and using local schools.

WalkBoston suggests additional examination of the role of schools on the walking paths proposed for the development. Students attending the Bradley School from both Suffolk Downs and Orient Heights would be well served by a neighborhood connection to the proposed path network. In addition, we suggest looking at whether a playfield that includes active recreation uses could be located where Crestway Road meets Waldemar Avenue (Block 5 on Figure 3.7). A playfield located here could serve both the school and the new neighborhood at a logical intersection of the walkways that are such a positive element of the project.

For children living in the Boston portion of the Suffolk Downs neighborhood, access to schools in the Orient Heights neighborhood will be somewhat constrained because there is no vehicular access between the two neighborhoods, other than the route provided by going out from Waldemar Avenue onto Route 1A between Tomasello Drive and Boardman Street.

The closest Revere school is the Seacoast School, located on Bennington Street, which can be reached from Suffolk Downs only by an indirect route through the Beachmont transit station and by sidewalks for a further 1000 feet. The Garfield Elementary and Middle School is about 1500 feet north of Winthrop Avenue. Revere High School is located approximately one mile north of Winthrop Avenue.

## **Route 1A along the western border of the project area**

WalkBoston has significant concerns about the proponent's plans for the Route 1A corridor. Adding a third vehicular travel lane in each direction and increasing roadway capacity from 2,100 to 3,300 vehicles in each direction – an increase of 57 percent – threatens to undermine the ambitious transit-oriented development goals the proponent expresses elsewhere in the proposal. Increased vehicular traffic will also mean more greenhouse gas emissions and more risks to pedestrian and bicyclist safety. We question the need for more vehicular travel lanes on Route 1A between Furlong Drive and Boardman Street, as most southbound traffic on Route 1A will likely access and exit the project site via Route 145/Winthrop Avenue, rather than the proposed "super street" corridor. Similarly, because of the extensive footprint of the Tomasello Drive intersection with Route 1A, we assume that the proponents are anticipating that most of the northbound Route 1A traffic into the site will enter via Tomasello Drive and exit via the same intersection.

The proposal to add more vehicular travel lanes within the existing roadway footprint will also undermine pedestrian and bicycle accommodations along Route 1A. Adding lanes will likely require narrowing or eliminating the current highway median, which would otherwise provide an important pedestrian refuge at the new proposed crossings at Tomasello Drive and Furlong Drive. Absent such a refuge, pedestrians will be forced to cross six highway travel lanes at once, which increases safety hazards and diminishes connectivity between the project site and development and recreation opportunities along the Chelsea Creek. Adding travel lanes while maintaining a five-foot roadway shoulder also reduces the space available for truly safe and protected bicycle facilities. The current proposal for a narrow five-foot unprotected shoulder alongside fast-moving highway traffic does not provide any meaningful protections for cyclists.

Instead of the “super street” concept, we encourage the proponents to reconsider Route 1A as a truly multimodal transportation corridor, with no new travel lanes except those built as dedicated pull-offs for buses on both the northbound and the southbound sides of Route 1A. This will further advance the proponent’s vision for transit-oriented development, while also maintaining space for protected pedestrian facilities in the median of Route 1A. Dedicated bus pull-out lanes also provide for increased bus service. As part of such a plan, the proponent should commit to improved bus stop facilities along Route 1A, including benches and shelters. Pull-outs for bus lanes and bus stop facilities should be considered for replacement of the existing unsafe bus stops at Furlong Drive, the jug handle at the tank farm, Tomasello Drive and Boardman Street.

#### **Pedestrian access to Route 1A bus connections**

Existing conditions for pedestrians and bus riders on 1A are terrible. We are glad that there are proposals that provide safe access for pedestrians to bus stops on Route 1A, including new pedestrian crossings at Tomasello Drive and Furlong Drive. The principal users of bus services may be most concerned about access at Tomasello Drive. The existing Tomasello Drive intersection is proposed to be divided into two components – one for traffic entering Suffolk Downs from Route 1A and the other for traffic exiting Suffolk Downs onto Route 1A.

Pedestrians from both Waldemar Avenue and Suffolk Downs are affected in a dramatic way by this proposal, which would add a bus stop island for northbound buses on Route 1A, a pedestrian island between the travel lanes for traffic exiting the site onto Route 1A, and a right-turning slip lane for traffic entering the site from Route 1A. We encourage the project proponents to also consider a more conventional T design for this intersection, similar to what exists now.

Under the proposed new configuration, most pedestrians will approach the intersection on the south side of Tomasello Drive, as that is the path that connects to the residential areas in the “Panhandle” of Suffolk Downs, as well as the homes in Orient Heights. The bus stop on the Suffolk Downs side of Route 1A would be located directly adjacent to the Tomasello Drive exit lanes onto Route 1A. Getting to the bus stop would require passengers to cross the right-turning slip lane from Route 1A to reach the bus stop island. The crossing of the slip lane is likely to be more dangerous for pedestrians than other crossings, as traffic entering the site may not be stopped by the Route 1A signals. This should get more attention in final designs; one option would be to install a signal protecting pedestrians and a crosswalk.

Pedestrians crossing Route 1A are primarily bus passengers using southbound Route 1A bus services. They, too, are required to cross the potentially dangerous slip lane from Route 1A into Tomasello Drive, along with the southbound lane that serves traffic exiting from Tomasello Drive. Pedestrians would halt on the island between the travel lanes exiting the site and cross directly to the bus stop on the west side of Route 1A. This movement can be made concurrently with the signal phase allowing exiting traffic to

move from Tomasello Drive onto Route 1A. Designers of the traffic flow for this intersection must consider the possibility that walkers cannot cross without a median break that affords refuge and safety for pedestrians who cannot cross in one signal phase.

**Offsite mitigation for pedestrians and bicyclists**

The project proponents outline an extensive program for offsite traffic mitigation in Section 6.10 of the DEIR, detailing numerous operational improvements for motor vehicles broken down by specific locations and intersections. Pedestrian and bicycle improvements are described only briefly and in largely general terms at the end of this section. We encourage the proponents to provide more detailed plans in the FEIR for pedestrian and bicycle improvements at the same locations and intersections they are prioritizing for offsite traffic mitigation.

Thank you again for this opportunity to comment on the proposals that affect pedestrians in the Suffolk Downs project.

Sincerely,

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

Wendy Landman  
Executive Director

Cc: Bob O'Brien, City of Revere  
Page Czepina, MEPA Office  
Tim Czerwienski, Boston Planning and Development Agency



Tim Czerwienski &lt;tim.czerwienski@boston.gov&gt;

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**Notes to include for 12/17/18 \*\* RE: Suffolk Downs & HYI Investment group**

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**Delprato, Therese F** [REDACTED]  
To: Tim Czerwienski <tim.czerwienski@boston.gov>

Mon, Dec 17, 2018 at 4:23 PM

Attn: Mr. Tim Czerwienski [tim.czerwienski@boston.gov](mailto:tim.czerwienski@boston.gov)

&amp;

Mr. Tom O'Brien HYI Investment group

Please add these notes for review &amp; comment re the project Suffolk Downs &amp; HYI Investment group

- 1) Industrial Hygienist dedicated to the project for the existing building, Suffolk downs main Unit from 1920 \*\*
- 2) Concern of lead pain & dust to the Waldemar ave., direct abutters
- 3) Opportunity to those families directly affected, the "Orient Heights neighborhood" for jobs during construction &
- 4) As competition occurs, Management & supervision of the new complex
- 5) Mitigation to/for the direct abutters of the project as it affects Waldemar ave Homes\*
- 6) Cleaning of exterior walls of homes/paint/monetary adjustment/tax reduction

These are all items I would like to see included in the reflection of Project of phase one.

If they need to be reviewed at a different time/phase of the project/please note what

Phase they will be reviewed in.

Thank you for time to address these concerns.

Best Regards,

Therese DelPrato

[61 Waldemar Ave](#)[East Boston, MA 02128](#)

*Therese DelPrato Lead RMA, EMT, EMT Supervisor*

*Boston University Student Health Services 881 Commonwealth Avenue, WEST Boston, MA 02215*

Te [REDACTED]



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December 17, 2018

Brian P. Golden, Director  
Boston Planning and Development Agency  
One City Hall Square, Ninth Floor  
Boston, MA 02201

Delivered via email: [tim.czerwienski@boston.gov](mailto:tim.czerwienski@boston.gov)

**RE: Draft Project Impact Report (DPIR)  
Suffolk Downs Redevelopment Project**

Dear Director Golden:

We are pleased to submit these comments on the Draft Project Impact Report for the Suffolk Downs Redevelopment Project both 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.

HYM Investment Group's expansive proposal for the former Suffolk Downs Race Track with a proposed 20-year build out plan represents perhaps the largest single development in Boston since the filling and development of the Back Bay. Unlike that effort the transformation of Suffolk Downs will be designed, implemented, owned and managed by one company. It is also happening at a critical moment in the city's history as the growth of its population brings us close to numbers approaching our historic demographic high water mark of the post-war period, while the literal high water mark along our coasts are evincing the effects of climate change. As such this project carries on it a unique burden of opportunity that must be prudently evaluated and carefully vetted to ensure that the mistakes of the past are not repeated and that the prospect of creating a development that positions both the City and State as leaders of urban development in the 21<sup>st</sup> century is maximized to the benefit of our residents.

Given the historic and transformative nature and scale of this project it is unreasonable to expect a single developer to be able to address all the issues that are of concern to the public within the limited outlook of their own balance sheets. Accordingly, the suggestions and observations below are directed not only at HYM Investments but to officials at the State and the City. It will require a collaborative effort of the private and public sectors to ensure that the long term public good takes a priority over the expediency of profit. The developer is entitled to make money from their investment, however it is the public of the Commonwealth and residents of the City that will have to live with the decisions made. We will be looking to both the developer and the City and State to ensure that this opportunity is maximized for the residents of Boston today and for future generations.

#### Environmental Justice/Enhanced Outreach

It is our understanding that the project does not trigger an enhanced Environmental Justice Analysis under the current Environmental Justice policy of the Massachusetts Executive Office of Energy and Environmental Affairs, 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

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lives of the people in those blocks, however it does reach the threshold for enhanced outreach. The project proponent has hosted a large number of presentations and once failings were pointed out earlier in the process, they improved their efforts to reach out to the EJ communities of the area, including appearing on Spanish-language media. The public presentations have provided a degree of simultaneous interpretation and one night of the recent series of presentations was dedicated to the Spanish-speaking community.

While recognizing and appreciating these efforts, we have to point out that this has fallen far short of what we consider “enhanced outreach” (granted, it would be helpful for project proponents and EJ communities alike if the MEPA office could provide some better standards to define “enhanced outreach”). In particular, we have heard from bilingual audience members who have used the interpretation that not all of the content of the presentations were completely or accurately interpreted. During the referenced presentation for the Spanish-speaking community, the original interpreter could not attend and a substitute interpreter provided a degree of interpretation, however most of the evening, including the questions and answers, devolved into English. The headset/transmitter equipment used for the presentations frequently failed or were overwhelmed with static.

We would recommend that the proponent find an interpreter who could be prepped on the presentation and actually deliver the entire presentation in Spanish with the project proponent available to answer questions. This would provide the benefit of more accurately presenting the project to the Spanish speaking public, obviate the need for problematic headsets and would also remove the necessity of simultaneous interpretation (which frequently becomes sequential interpretation) which would save time and be less disruptive.

Beyond the project proponent, the effort at enhanced outreach could be facilitated by the Boston Planning and Development Agency (BPDA) by providing some basic information to an audience that is not conversant with public processes having recently immigrated to this country and/or never having been engaged in municipal and state planning processes. Particularly, there were a number of questions very pertinent to the EJ community focusing on displacement effects of the project and the affordable housing requirements of the project that would have been better served by City staff providing Spanish language materials about the City’s Inclusionary Development Policy and answering questions about that general program rather than having the project proponent have to face questions to which he could only answer that he was complying with the City’s requirements.

Finally, it should be noted that there are other non-English speaking communities within East Boston and the region besides Spanish speakers. It is unclear what, if any, outreach was done to those members of the EJ community in the area.

We recognize the challenges of performing enhanced outreach in EJ communities and are more than willing to work with the City and the Project Proponent to assist in whatever way that we are able and is appropriate. That being said it is our opinion that at this point in the process the outreach to EJ communities has been inadequate.

#### Transportation

A project of this size will have sizeable impacts on transportation concerns in an area where the air quality and quality of life is already severely affected by commercial and passenger vehicular and air traffic. Existing transit systems suffer from a generational lack of investment on the part of the State and

a comprehensive, regional vehicle traffic plan for the northeast approach to Boston has eluded State planners since the cancellation of the northeast expressway nearly 50 years ago.

Locally, the City of Boston is beginning a process of master planning for the neighborhood, however after over a decade of rapid and nearly unfettered growth in East Boston the traffic situation has become nearly inoperable for the current residents, let alone the thousands more represented by this project. The clash between regional and airport traffic priorities, and the local community has recently come into sharper focus as the reconfiguration of the entrance to the Sumner Tunnel has highlighted the conflict between the needs of regional traffic access to Boston from the North Shore, the increasing volume of traffic to and from the growing Logan International Airport and the needs of local residents trying to get from one side of their community to the other.

Within this context the Suffolk Downs Project will clearly have a difficult time defining mitigating measures as the baseline conditions are unacceptable to begin with. So to reiterate, we look to the City and the State to avail itself of this opportunity to implement solutions which will work in tandem with the mitigation efforts that will be required of this one project, and to not expect or present this project as if it, on its own, will resolve long-recognized transportation problems beyond its 161 acres. That being said, we do have these comments about the DPIR's transportation proposals.

#### *Roadways*

The project proponent has presented an array of off-site transportation solutions that will mitigate the impact of added traffic to and from the site. This includes roadway improvements at 30 different locations at a cost of \$50 million. While some of these improvements could indeed be done for low cost, we highly doubt that this quantity of money is enough to realize all of these projects. It is unclear whether the projects would be aided by State funds or whether only a subset of these projects will be prioritized and realized. We would ask MassDOT for a detailed analysis of these projects from both a logistical/financial point of view (is this enough money for this list of projects?), as well as from a regional transportation point of view which would put these projects within the context of the State's existing long term plans for the transportation infrastructure of this region. From the City we would expect a similar report from the Boston Transportation Department (BTD) in regards to the local traffic improvements.

Of the various roadway projects proposed, the Route 1A improvements are particularly of interest, as it's not clear how or if the new alignment is possible or would work in the manner described. We would like to see an analysis of the proposal from MassDOT with a focus on both the practicalities of squeezing in two more lanes on this stretch of road, as well as the financial burden this would represent.

#### *Transit*

The proponent has focused on the Transit Oriented Development (TOD) aspect of this project as one of its largest benefits. Having two Blue Line MBTA stations does represent a great opportunity. The ridership data used in the DPIR relies on MBTA/CTPS data which we have found to be of questionable quality in some instances (e.g., recent ridership data on the Route 111 bus was very questionable). The data on Blue Line capacity looks quite suspect. According to the data presented, the Blue Line is far below its "crush capacity" and the proponent's analysis does not see the new development, as well as factoring in for growth from additional developments in the area, being a problem. These data (as represented in the Passenger volumes at peak load point graphics – figures 6.27a-c) do not reflect the reality currently experienced by the Blue Line riders today. At rush hour the trains are full to capacity and riders frequently must wait for one or two trains to go by before finding a wagon with standing

room. Whether this may be attributed to days when service failures have taken a train out of service, the reality is that this is what the service is like. Attendees at the project presentations have collectively gaped at the data presented from CTPS as it has not reflected the Blue Line that they use regularly. We would like to see a better analysis of the current rider experience and whether this falls on the proponent or MBTA, these data need to be collected by an independent third-party. We urge the City of Boston to join us in requesting this from MassDOT and the MBTA.

The proponent has proposed to operate and maintain shuttle buses looping through the site, connecting to local transit hubs (the Blue Line stops) and to locales of interest, such as North, South and Chelsea Station. While this is logical and appreciated, it is concerning as public transit should be a service provided and answerable to a public institution (even if the service is provided by a private contractor). It is unclear as to whether these shuttles would be fully available to the general public or for how long they would be maintained. Would they be answerable to equity measures overseen by the Federal Transit Administration (FTA)? For this reason we would advocate for an expansion of the MBTA bus network to include the development, as well as an improvement of the system in the immediate area in terms of reliability and headways, in order to provide a viable alternative to cars for those both within the development and the neighboring communities.

The addition of private shuttle buses into the traffic mix that already clogs the local road network of Routes 1A, 16, the Tunnels and local municipal streets will not be a good thing. It should be required that any shuttles, if they are implemented, be electric vehicles so that at a minimum they would not contribute to the degradation of local air quality and emission of Green House Gases (GHGs). Given that the connection to the existing rapid transit system is a selling point of the project, it makes little sense for the shuttle routes to simply take riders to the same endpoints (i.e., other MBTA stations easily accessible from the Blue and Silver Lines such as North, South and Chelsea Stations). As opposed to adding additional vehicular traffic perhaps these shuttles (or augmented MBTA bus routes) could go to locales more difficult to reach by public transit.

We applaud the Project Proponent's proposed investments in bicycle and pedestrian infrastructure. It should be clear that these are also amenities of the properties as much selling points for the properties as they are public benefits. Realistically for those working in Boston and living on the site biking will not be a preferred option given the lack of a viable biking connection to Boston proper. For those that might be working at the site in the restaurants or in other service capacities, the potential for bike commuting is greater, as such the connections to the local neighborhoods is critical. In addition to the proposed connections to East Boston it is strongly recommended that the Proponent work with other municipalities and the State to ensure safe and efficient bicycle access to Revere and Chelsea as it is through those routes that many low income workers at the site are likely to be traversing. Currently bicycle access across Routes 1A, 16 and 145 is challenging to life-threatening.

### Housing

The most contentious aspect of this project has been the issue of the affordability of the housing proposed. At this point the Project Proponent is following the minimum requirements laid out by the City's Inclusionary Development Policy (IDP) – 13% of the units will be accessible, as defined by the policy. Unfortunately, the definition of affordable is frequently out of the reach of many in the community.

Firstly, the Area Median Income (AMI) that is used to define affordability is horribly skewed. The area in question is an odd, gerrymander of a delineation that includes the income levels of communities as far removed as Seabrook, NH, while simultaneously excluding nearby, low income communities such as Lawrence to the north, Brockton to the south and Worcester to the west. According to the most recent American Community Survey data (ACS 2013-2017 five-year estimate of median household income), of the top 20 richest municipalities in Massachusetts 17 are in this region, while of the top 20 poorest municipalities in the Commonwealth, 0 are in this region. Until recently that last statistic was 3 – which included the nearby communities of Chelsea, Lynn and Everett. The new data reveal that median incomes have gone up in these communities (they have moved out of the top 20 list of poorest communities), however this is more likely a result of increasing displacement of poor populations and not a “lifting of all boats” as wages have generally remained stagnant.

The upshot of this poor definition of affordable is that 80% of AMI (a frequently used income limit) is persistently well above 80% of the local neighborhood AMI in rapidly gentrifying neighborhoods. For example, the AMI for 2016 in the general AMI-defined region was \$98,100 when in Chelsea for the same time period AMI was \$49,614, almost half the amount used to define affordability for the City. In the case of Boston, the local neighborhood of a project should be used as the neighborhoods of Boston exhibit some of the worst wealth disparity for a City in the country. Essentially our affordable housing policy is being used as a “social wringer” to expel the lowest income families in our communities. Given the scale of this project the BPDA should be working with DND and the Office of Housing Stability to re-evaluate the affordability guidelines specifically for this project. Assigning a larger percentage (may we suggest 25%) of the housing as affordable is a start – there should also be a re-evaluation of what affordable means *relative to the current population of East Boston that is confronting the housing and displacement crisis*.

Clearly lacking in this DPIR is an analysis of the impact of this development on the local real estate market, including the impacts on low income residents of this EJ community, as well as recommendations for mitigation of these impacts. It has been repeatedly stated in presentations that no one would be displaced by this project as no one lives on the site presently, which is clearly a disingenuous dodge of addressing what the sizeable impacts of this project on displacement in the surrounding neighborhoods will be. The Project Proponent should look at the effect of this project on the market pressures in the surrounding communities (and we would suggest that this study should include Revere and Chelsea, as well as East Boston).

#### Land Uses & Community Impacts

This project, similar to other large-scale developments such as the South Boston Waterfront District and Assembly Row in Somerville, presents the wholesale creation of an entire neighborhood anchored by transit infrastructure. What is clear in both of these other cases is that an exclusively mixed-use (mostly high-end) residential and commercial development more closely resembles a suburban mall than it does a vibrant, urban neighborhood. Aside from condos and places to eat, a neighborhood is also defined by municipal uses such as schools, police and fire stations, city offices and libraries, as well as places of worship, community-oriented organizations such as the YMCA, Community Social Centers, hospitals and clinics and other non-commercial entities. If the only public spaces are to be privately-owned, commercial spaces there is a risk of a feel of exclusivity.

The Project Proponent has mentioned the possibility of some spaces being available for community use (and obviously the privately-managed open space is the center piece of the proposed public benefit for the community) however the description in the DPIR is limited to:

- Civic spaces such as an outdoor performance space (when the public Open Space area is not retaining flood waters), an Innovation Center and public plazas near the T stops,
- Some historical element capturing the racing history of the site (either within elements of the open space or in a local museum – which one is not mentioned),
- Working with BPDA on integrating civic/community space.

Who would be responsible for the programming, where the money for this would come from, long term sustainability/viability of these uses are all questions still and we hope will be elaborated upon in far more detail in upcoming reports. We would recommend working with local institutions such as the East Boston CDC and NOAH in terms of identifying mechanisms for the long term sustainability of civic institutions occupying spaces in the community (the Proponent could look at long-lived and strong examples such as Meridian House, Atlantic Works, Zumix, etc.).

Finally, we would wish to express our concern about the increasing proliferation of "privately owned public space" (POPS) as the increasing privatization/commercialization of public space is a phenomenon that is experienced quite differently by different segments of the population. Until a greater equity and socio-economic accessibility analysis is performed on the effect of POPS in the urban environment, there is a risk that we are meeting our public space needs with a mechanism that may not be as answerable to the public as a publicly owned space would be. The long term viability and performance of POPS is undefined. The Boston Common, for all the challenges of funding the maintenance of it, is still present and available equally to all 384 years after its establishment. Can any private entity make that kind of claim or promise?

#### Sustainability and Green Building

The proponent's "Response to Request for Additional Information" dated November 30<sup>th</sup> included a number of positive changes in this area and we would encourage them to go even further and for the City to require it. Energy efficiency measures and technologies to further the sustainability of our built infrastructure continues to advance rapidly. Given the long time frame of this project and the scale of its impacts, we should expect that the project will not only start with the state of the art of what is available in Green Buildings and sustainability, but will continually upgrade its commitments in this area during the construction period as technologies and best practices advance. The City should be requiring that this project remain at the forefront of sustainability as it develops rather than setting static goals that will be surpassed in during the build-out of the project.

Towards that end we would like to see the entire site consist of LEED Platinum buildings. More so than the actual ratings what we would truly prefer to see is a development that represents the values expressed in the City's Carbon Free Boston program, as well as the Net Zero goals for the region. Similarly, we expect that the Project Proponent will pursue its development in accordance with the goals of the City's Zero Waste program. For such a showcase development for the City of Boston this project should be the most sustainable, green and carbon-neutral neighborhood in the country.

In conclusion, we once again thank both BPDA staff and the Project Proponent for the efforts you have put into this process to date. It is noted and appreciated and we are available to help improve the effort in regards to outreach in the EJ communities of the area. We look forward to seeing the responses to our requests for additional data and study. This project represents a challenging and complicated

project that will greatly impact not only East Boston but the greater Boston region for many generations to come. We are all clearly united in wanting the best project possible for all and we look forward to working with the Project Proponent, the State and the City in assuring this outcome. Thank you again for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to be 'John Walkey', written on a light gray rectangular background.

John Walkey  
Waterfront Initiative Coordinator  
GreenRoots





Tim Czerwienski &lt;tim.czerwienski@boston.gov&gt;

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## comments on Suffolk Downs HYM project

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**Eleanor G. Mazzarella Catino** [REDACTED]  
To: Tim Czerwienski <tim.czerwienski@boston.gov>  
Cc: [REDACTED]

Tue, Dec 18, 2018 at 7:36 PM

Hello Tim,

Thank you for this opportunity to share some of my responses to the Suffolk Downs project. The time spent sitting at meetings and discussions and reading through the documents has left me with some thoughts about this project - which will greatly impact the city of East Boston and the neighborhoods around the project for years to come. I appreciate the opportunity to comment as well as the many presentations and conversations that HYM has encouraged and supported.

My first major concern is about the height of many of the taller buildings and the density of the project overall. As we have been told, the Suffolk Downs project is one (?) of the largest development projects in the history of the city and the immensity of the project has become apparent. Although it appears that HYM is working to think carefully about this and balance many competing voices, I feel it would be important to consider reducing the height of buildings as they are immense in comparison to the neighborhoods around them. I understand that this is asking a lot of this development but I do think it is a valid and pressing concern.

Connected to the density of the project is the issue of traffic. Again, HYM has been helpful in sharing their many studies and ideas for mitigation around the issue of traffic. It is encouraging to see that they actually seem to be taking the issue seriously. I hope that they continue to pursue issues related to traffic. I would also ask that we consider the impact of more traffic at the intersection of Waldemar and Bennington Street. People are also concerned about the traffic at the rotary intersection of Saratoga and Boardman Street.

I have been impressed by HYM's commitment to open space and their thoughtful incorporation of the ways in which people are able to move through the space. I would like to continue to encourage them to continue to think about the open space and areas that would be useful to East Boston as a whole, such as playgrounds and playing fields.

I am concerned about the impact of such a large project on the local resources, especially emergency services and the schools. Although we have been told that there would be minimal impact on the schools, I would like to see more specific facts and get a sense of how they came up with those numbers. Even with small numbers, 20-25 children is a whole classroom in a school.

And, in terms of mitigation, I think those conversations need to continue happening. Much of the proposed mitigation is what is required by either the city or state, if I understand correctly. I agree with others who have talked about establishing a fund around this project that provides directly to the community of East Boston, through scholarships, local grants, public space, etc. The impact on the community of East Boston is quite different than the impact on Boston as a whole. The mitigation needs to address this issue.

Although I sometimes get the sense that there are those who feel as if the issues of height, density and traffic have been discussed sufficiently, I disagree. These are central issues to the project and set the tone for the entire project. Those issues are foundational and if we do not address the foundations first, we all know that things will tumble. So continuing to raise these issues is a persistent optimism that this project will continue to develop in ways that will make sense to all of those who work to advocate for the community of East Boston.

Thank you for your time.

Sincerely,

Eleanor Mazzarella Catino



December 19, 2018

Tim Czerwienski  
Project Manager  
Boston Planning & Development Agency  
One City Hall Square, 9<sup>th</sup> Floor  
Boston, MA 02201

Dear Mr. Czerwienski,

I am writing this letter of support for the HYM/Suffolk Downs Redevelopment project. Let me begin by applauding HYM's efforts to inform and include our community in the planning and design process. HYM has been extremely responsive to the recommendations and feedback of concerned residents. There is no doubt that the development of Suffolk Downs is the largest development project to impact our community in my lifetime. The sheer size and scope of this project will have a profound impact on both the infrastructure of East Boston and its residents.

The new community being developed will provide needed condos, apartments, townhouses and senior housing, commercial space, and additional green space to East Boston and bordering communities. I support the development of Suffolk Downs and HYM in their continuing effort to address concerns of density, height, and the transportation impact of this project. The continuing exchange between HYM and the impacted communities is the best guarantee of a successful development.

Sincerely yours,

Debra Cave

Comment: Created Date	First Name	Last Name	Organization	Opinion	Comments
12/15/2018	juliana	leal-nunez		Oppose	<p>My husband and I are in our mid thirties and want to start a family in the next couple of years. We currently rent a 2 bedroom apartment on Chelsea St in East Boston that was recently renovated. We are the only people of color and the only people actually invested in East Boston as a neighborhood in the entire building. He works a union job for the state, and I'm a college graduate with 10yrs dedicated to my corporate career, working full time. We spend HALF OF OUR INCOME ON RENT. East Boston and Revere have the character, charm, and appeal they have today because of blue collar, hard working, often minority and immigrant population who invested into their neighborhoods. And these very same people are being priced out of their own homes, or left to live in dilapidated, unfit, forgotten rental units (until their buildings are sold and they're forced out). This is not only sad, it's revolting - because it's in the hands of our representatives, our leaders, to say NO to building without a conscience, NO to leaving real people, real constituents out of sight and out of mind, and to say NO to turning East Boston and Revere into another homogeneous, gentrified, no-character-having couple of neighborhoods that displace their own communities without a second thought. Greed does not build, it destroys. We ask that you really put your power where your mouth is. Seize this opportunity to provide a future for your constituents - the people who have dedicated their lives to breathing life and character into these neighborhoods. Don't turn us into more statistics. Take a stance and do what's right. Fight and win for affordable housing, for the future of the people of</p> <p>East Boston and Revere.</p>
12/14/2018	Kate	Cowie-Haskell	Boston resident	Oppose	<p>Development of this neighborhood needs to happen with MORE AFFORDABLE HOUSING UNITS at an income level that is actually affordable. I encourage you to consult with City Life Vida Urbana about making this neighborhood accessible and healthy for all.</p>

Comment: Created Date	First Name	Last Name	Organization	Opinion	Comments
12/13/2018	richard	patoski	1949	Oppose	Opposed until there is a requirement that at least 50% of the square footage built be housing and that there is more (at least 20% of the total number of housing units built) long term deed restricted affordable workforce rental housing which can be achieved by allowing the the developer to build higher residential buildings with limited parking beyond spaces for share driving vehicle such as zip cars, that renters would be charged extra for on a demand-supply cost basis (no free parking for either residential or commercial space tenants/owners. Require that the developer be specifically required to build some of the affordable housing as deed restricted Limited Equity CO-OP housing that will stay affordable forever, on the model of the Garment Workers limited Equity CO-OP Housing in NYC ( not the brick bottom artist co-op in Sommerville that was structure so poorly that co op member were able to cash out when the market value of their units went up ) Probably the most stable affordable housing in Manhattan today.

Comment: Created Date	First Name	Last Name	Organization	Opinion	Comments
12/4/2018	Elena	Bertkau		Neutral	<p>Good evening, Thank you for making it possible to submit comments online. I think HYM is doing a wonderful job of vetting the project and taking community input into the plans. I'm writing to raise a concern about the impact this will have on East Boston now that progress that HYM is making towards starting work at Suffolk Downs. Many drivers are already getting off of 1A to avoid traffic cutting through the Day Square area of East Boston to reach the Sumner and others are getting off Route 1 and coming through Chelsea through the Central Square area East Boston to go through the Sumner rather than the Tobin Bridge. Both of these scenarios are causing an unfair burden on the East Boston community, which has been magnified by the Tunnel entrance reconfiguration with the removal of the Toll Booths. During the latest presentation at the Eagle Hill Civic Association about Suffolk Downs there were many intersections/transportation hubs included in their review, but it was quite noticeable that the Sumner tunnel entrance was not on this list. The proposal will exponentially increase the amount of people and cars traveling through East Boston along 1A and our local roads if the commuter rail, subway and blue line are not properly upgraded. I would like to implore the state investigate a few potential opportunities to get ahead of this transportation Crisis and create a commuter rail line that splits in Lynn and creates commuter rail transportation hubs in Revere and East Boston (neither of which are currently on the commuter rail System) which will create infrastructure to support the excessive growth in our neighborhoods, find a way to extend and increase weekday and weekend regularity in the blue to Lynn or beyond and establish and promote incentives for drivers to take public transportation into the city. As this development moves forward the city of Boston to install</p>
11/3/2018	James	Linthwaite		Oppose	<p>More than 300 units are either proposed or under construction just between Addison and Swift Streets in East Boston. That number does not take into account the hundreds of units proposed at Suffolk Downs. The roads can't handle the current traffic. And even if, as the developers and their attorneys falsely assert, residents won't have cars the MBTA can't handle rush hour now. There has been, and it appears there won't be, any investment in infrastructure. As a result the community is grid locked almost 24/7 with no concern being given to the quality of life of existing and new residents. Large developments such as this are completely out of scale and inappropriate given the current state of roads and public transportation.</p>

Comment: Created Date	First Name	Last Name	Organization	Opinion	Comments
10/23/2018	James	Linthwaite		Oppose	<p>This project is far too large for the parcel and the surrounding area. In addition to this project there are over 330 units proposed for the area between Addison Street and Swift Street. This scale of development such a small area is entirely too dense. The existing infrastructure cannot handle the current vehicle traffic. The MBTA Blue Line is unable to currently cope with morning and afternoon rush hour. While I understand that housing is needed this benefits no one other than the developers and no infrastructure changes or enhancements have been put forward. Thank you.</p>
10/5/2018	Feruzza	Acevedo		Support	<p>After attending numerous presentations for this project and recently seeing a scaled model of the project being proposed, I am in full support of the project. We are in the process of trying to build a home for our family on Waldemar Avenue. Despite being in close proximity, we believe this development would be an incredible opportunity for the neighborhood and would create much needed housing; as well as it would create new restaurants and retail options within walking distance. Our current retail options in East Boston leaves much to be desired; I hope this development when finished will change this outlook. The renderings of the parks, bike trails, and outdoor space as well as the buildings themselves look incredible.</p>



Secretary Matthew A. Beaton  
Executive Office of Energy and Environmental Affairs  
100 Cambridge Street, Suite 900  
Boston, MA 02114

Director Brian Golden  
Boston Planning and Development Agency  
1 City Hall Square, 9<sup>th</sup> Floor  
Boston, MA 02201

**Re: MyRWA Comments on Suffolk Downs Redevelopment DEIR/DPIR**

January 14, 2019

Dear Secretary Beaton and Director Golden:

Thank you for the opportunity to comment on the largest single redevelopment project in the Mystic River Watershed, which spans 21 municipalities from Reading through Revere. The Mystic River Watershed Association (MyRWA), was founded in 1972 to protect and restore the river, its tributaries, and watershed lands for the benefit of present and future generations. The Boston Society of Landscape Architects was founded in 1913 as the first chapter of the American Society of Landscape Architects. Today BSLA connects nearly 600 landscape architects across Massachusetts and Maine, as it serves to advance the profession of landscape architecture and promote the creation of extraordinary environments in cities and towns from the Berkshires to Bar Harbor to Boston.

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

Please note that we were able to incorporate few additional comments for the modified DEIR, except to say that we strongly support expanding the Sales Creek buffer back to the customary 100 feet from 25 feet. Sales Creek is part of the designated Rumney Marshes Area of Critical Environmental Concern (ACEC) due to its connection to Belle Isle Marsh; a 25-foot buffer minimizes the ability to restore its ecological function.

**Overall Analysis**

Regulators required a very high standard of analysis of projected 1% stormwater and coastal flooding in 2070. The analysis goes significantly further than what we have seen in past developments and uses the best available scientific data and models. It led to some important insights that point to more cost-effective opportunities for flood management. We hope that public

agencies are able to assist smaller developments with access to this quality of work. We also thank HYM for meeting with us twice and value the project improvements we saw over the course of 2018.

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

### **Urban Design**

Given the scale of this development – larger than Tufts’ University campus – urban design decisions will play large roles within this development and for East Boston and Revere. A robust landscape and building stock that provides environmental and quality of life benefits is hugely important. We commend the developer for enhancing Sales Creek and Horseshoe Pond, creating green streets (“green fingers”) along portions of the street grid, increasing native plantings and control of invasive species, reusing runoff for landscape irrigation, and redirecting stormwater discharge away from Sales Creek and Belle Isle Marsh. We have several key recommendations that we believe will improve the natural and built environment for residents and neighbors:

- **Connections to Belle Isle Marsh:** We understand that the MBTA Blue Line lies in between the project site and Belle Isle Marsh, limiting opportunities for both pedestrian connections and opportunities for the marsh to migrate inland. *We recommend providing clear signage and wayfinding through the Suffolk Downs and Beachmont Blue Line stations to link proposed pedestrian pathways with those in the marsh.*
- **Design Excellence:** *We suggest that the developer recruit and select an array of architectural firms through a competitive RFP process to ensure that the development doesn't feel generic and monotonous but rather provides visual interest and cutting-edge designs that set a new standard for the region.*
- **Supporting Local Nonprofits:** we appreciate the commitment to providing 10% of the retail space to local companies at an affordable rate. We think more could be done to bring the community and local culture into the development. This could *include free and/or discounted spaces for local nonprofits and community groups in the proposed community spaces.* A great example of this is the Society of Arts and Crafts located in the community space at 100 Pier 4, South Boston as part of the Chapter 91 requirement.

### **Sustainability/Green Building**

By pursuing a model of patient, neighborhood-level development, Suffolk Downs has the opportunity to set a new standard for cost-effective, sustainable, carbon-neutral, climate-prepared development. LEED certification is one way to work towards this goal. We are pleased to see plans to pursue LEED certification and that there will be 20% green roofs (as stated in the modified DEIR). We would recommend that the developer pursue a higher standard of LEED certification than 5% LEED Platinum Buildings, a minimum of 75% LEED Gold Buildings, and a maximum of 20% LEED Silver Buildings.

*Rather than suggest a ratio of LEED ratings, this development should seek to be carbon neutral, in line with Boston's 2050 goal. As certification is pursued for each building, we believe there should be points for Renewable Energy Production (Energy and Atmosphere) and Protect or Restore Habitat (Sustainable Sites) as these demonstrate an investment in natural systems.*

### **Wetlands and Waterways**

We commend the proponents for preserving and improving on-site wetland resource areas including the daylighting of Sales Creek, increasing native plantings and control of invasive species, removing impervious area in the Riverfront area and restoring disturbed or degraded areas closest to Bordering Vegetated Wetlands ("BVW") and Bank. We understand that a 50-foot setback from wetlands associated with Sales Creek in combination with a reduction in development in areas subject to the 1% annual flood would render this project not financially feasible.

*However, given the ecological significance to the Sales Creek area, we ask for the customary 100-foot buffer zone to be maintained for Sales Creek to help protect Belle Isle Marsh. Both Sales Creek and Belle Isle Marsh, are part of the Rumney Marshes ACEC that has been characterized by the U.S. Fish and Wildlife Service as "one of the most biologically significant estuaries in Massachusetts north of Boston." The area includes approximately 1,000 acres of highly productive saltmarsh, tidal flats, and shallow subtidal channels.*

### **Transportation**

Suffolk Downs is also in an excellent position to exemplify 21<sup>st</sup> century, multi-modal transportation that reduces greenhouse gas emissions and provides safe and reliable transportation. We are pleased to see proposed walking and biking connections to Belle Isle Marsh and Constitution Beach as well as the 20-foot (where possible) community path between Constitution Beach and Revere Beach. We commend the proponent on pushing back on Revere's higher minimum parking requirements and *support the updated plan to incorporate a "shared parking concept; and inclusion of a requirement to track parking demand data which can allow the Proponent to reduce the construction of additional parking spaces as the development is constructed."*

We believe that several additional measures are needed to mitigate traffic impacts and incentivize mode shifting beyond single-occupancy vehicle use.

- **Ongoing Transportation Mitigation and Management:** as there are many assumptions that will change as the development is built over 20 years (e.g., trip generation predictions, impact on the MBTA Blue Line), *we recommend the creation of a multi-jurisdictional working group to decide the most impactful transportation mitigation projects.* This could be similar to the Lower Mystic Regional Working Group, but also include a budget for capital and operational needs that funds sustainable transportation (transit, walking and biking and car share/electric vehicles initiatives). This will allow for implementation, not just planning efforts. Development of a Transportation Management Agency that coordinates with surrounding North Shore TMA's would be prudent.
- **Active Transportation:** We applaud proposals to connect the site across Bennington Street to both Belle Isle Marsh and Constitution Beach and encourage the proponent to give similar consideration to Chelsea Creek. The proponent's plans to reconstruct Route 1A as a "Super Street" are counter to encouraging access to Chelsea Creek. *We encourage the proponent to*



*consider ways that the redesign of Route 1A can include safe and accessible crossings for pedestrians and cyclists to access potential future open space along Chelsea.*

- **Shuttles:** We understand that the nature of the shuttle system will change over time. Successful elements of the shuttle fleet include being: sustainable, reliable and affordable; comparable in price to the MBTA; electric/clean fuel; and connected to surrounding neighborhoods and other transit modes at off-peak hours. *As the proponent rolls this out over the years, we would ask that the shuttle proposal be thoroughly vetted with the community.*
- **Parking:** We understand that the City of Revere is requiring parking ratios for office/lab spaces at twice the ratio the City of Boston proposed for this site. The proponent suggests that meeting Boston's lower parking ratios would be "difficult", but provides no explanation for why this would be difficult in a TOD site uniquely served by existing transit. *We would ask that this office/lab space ratio be revisited to see if there is a way to cut down on parking so as to not incentive more single-occupancy vehicle use.*

Included in the proposed 15,250 parking spaces are 557 on-street parking spaces which the proponent identifies as free time-limited spaces. *We would ask that the developer explore the idea of metering these spaces to provide local revenue and encourage greater parking turnover rates.*

### Climate Change Resilience

It was clear from the DEIR that state regulators required a very high standard of analysis. We were glad to see that the DEIR uses best available numbers and flood models and that HYM is making this analysis available to Revere and DCR for use in climate planning in the Sales Creek watershed. *We encourage HYM to keep up with the latest climate projections even after permitting has been secured.* We were glad to see that the analysis led to the creation of on-site stormwater retention and the proposal to re-grade the property to drain into larger Chelsea Creek instead of smaller Sales Creek to lessen the risk of flooding nearby neighborhoods.



One strategy cited for on-site storage is the use of underground parking garages. Please note that when this strategy is used, the water storage area is typically separate from the parking area, as shown in the depiction of a stormwater storage tank built under a parking garage in downtown Rotterdam (see left).

We note that the DEIR appeared to contain some confusion between stormwater versus coastal flooding (for example, Appendix B, Page 7, E-1: "A large portion of the site will be designated as...sea level rise storage"). **Bordering lands subject to stormwater flooding** require compensatory flood storage on site. Stormwater flooding, even when extreme, is of finite volume with opportunities to store and release it slowly. Strategies to prevent stormwater flooding on one property—especially through elevating a site—may well increase flooding elsewhere. The proposal to send stormwater

to Chelsea Creek, not Sales Creek is a good way to manage stormwater with a neutral to positive impact on neighbors.

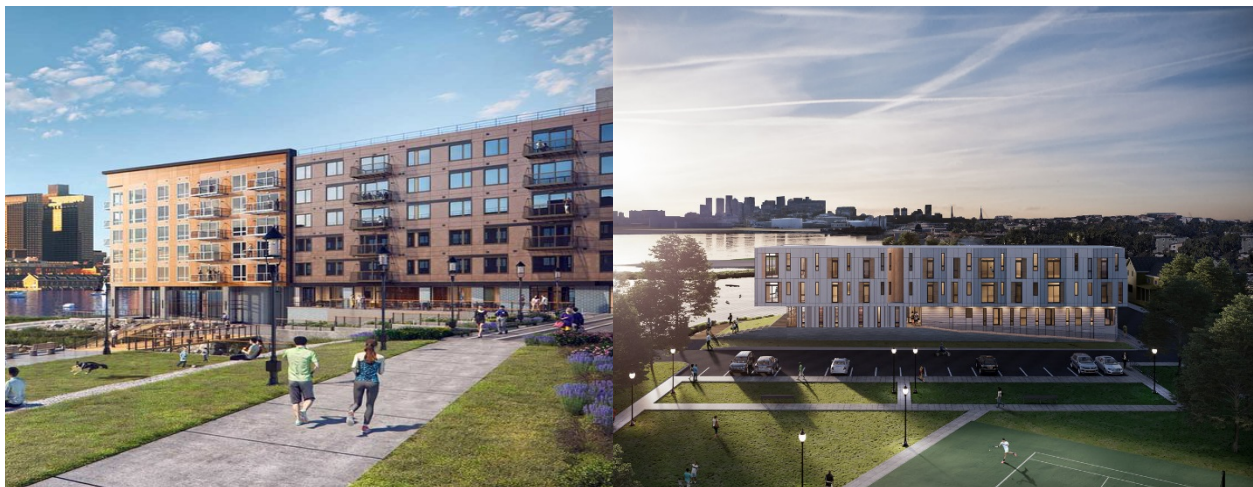
Conversely, **lands subject to coastal flowage** (e.g., water coming in through Belle Isle Marsh) don't require on-site flood storage because coastal saltwater flooding is essentially of infinite volume and is not storable. Preventing coastal flooding requires barriers (including tide gates) of effective height to keep out ocean water. This project should have no inherent impact on coastal flooding of its neighbors.

*We strongly support the recommendation that HYM contribute to a larger regional coastal flood barrier, rather than be required to complete a barrier that only protects its own site. We understand that this is beyond HYM's discretion, and hope that the cities of Boston, Revere and Chelsea, the MBTA, Mass CZM and local stakeholders such as the Friends of Belle Isle Marsh form a taskforce to design and implement a regional flood barrier that would also provide ecological and social benefits.*

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

The project lifespan is predicted to last fifty years from full build out, or 2085. If sea level rise projections are higher than the 2100 intermediate projections modeled, the site could experience high tides six feet higher by then. *Given the project site's susceptibility to coastal flooding, we urge proponents to elevate finished floor elevations to closer to 24 feet BCB through additional terracing between street level and their entrances.*

Two recent East Boston developments, Clippership Wharf and 181 Coleridge Ave (left to right, below), use effective variations on this to elevate first floor openings to this height. *Including extra-high first floor ceilings also provide opportunities to raise first floor elevations in the future.* Clippership Wharf also provides examples of multi-functional landscape architecture approaches that accommodate salt water inundation, while also providing new areas of public access and recreation to the harbor.



In addition, *shelter-in-place strategies, as proposed in the DEIR/DPIR require that residences be inhabitable for multiple days during hot and/or cold weather without access to power.* The Concord Highlands project in Cambridge, for example, is an affordable housing project that is designed maintain comfortable interior temperatures even without HVAC.

We are glad that project proponents met with experts in resilient architecture, including Ellen Watts of Architerra. Ellen has been promoting the idea of creating a branded standard of excellence in building, branding and marketing exemplary energy efficient/resilient buildings, as Hamburg, Germany has done (see [www.rexboston.com](http://www.rexboston.com)). *HYM could and should similarly issue RFPs with energy efficiency, design and resiliency standards for each building to take advantage of Boston-area design excellence in creating a highly-desirable, immediately exemplary neighborhood.*

Additional general comments:

- The NECASC precipitation data represent averages; Suffolk Downs is likely to experience the most damage from intense cloudbursts such as Hurricane Michael and Harvey brought North Carolina and Texas. *HYM's stormwater strategy needs to include a "fail quickly-fail cheaply" strategy for intense rainfall events that exceed design parameters.*
- Summer heat in Greater Boston is already increasing to levels beyond historical norms. Climate Ready Boston projections indicate that Boston could experience Washington, DC's climate by mid-century and Birmingham, AL's climate by late century. Landscape designs should include more water and shade elements than historic New England norms.
- We were glad to see project proponents go beyond regulatory requirements in considering heat effects (that said, local regulations regarding heat mitigation strategies are quite limited). Some recommendations:
  - o *Include not only light pavement, but also white roofs;*
  - o *Incorporate interactive water elements such as the Greenway's ring fountain and mist tents to help children and adults cool off;*
  - o *Make sure bike/pedestrian paths are shaded so they continue to be used during heat waves.*

### **Environmental Protection**

We commend the proponent for the thorough analysis of environmental impact on wind, shadow, air quality, and the impacts during construction. The Air Quality analysis focuses, as required, on CO and VOCs. However, traffic also generates heavy metal pollution that degrades water quality. Since the development will generate a significant increase in traffic, we feel that the impact should be assessed. *Since heavy metals are transported to water bodies via stormwater, we ask that the stormwater management plan address heavy metals.*

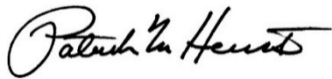
### **Infrastructure**

We commend the proponent for a stormwater management plan that will significantly improve the overall quality of stormwater run-off. We appreciate the reuse of runoff for landscape irrigation, as well as re-grading the site to direct more of the stormwater discharge into Chelsea Creek instead of smaller Sales Creek. The stormwater management plan utilizes retention rather than infiltration because of the existing soil conditions. The plan appears to have adequate stormwater storage

capacity to address current 100-year storms; as precipitation increases in intensity, additional strategies will be needed.

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

Sincerely,



Patrick Herron  
Executive Director, Mystic River Watershed Association



Gretchen Rabinkin, AIA, Affiliate ASLA  
Executive Director, Boston Society of Landscape Architects