

BOSTON

Martin J. Walsh, Mayor

May 31, 2019

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

RE: *Planned Development Area* for the Suffolk Downs project in East Boston

Dear Ms. Polhemus:

The Boston Parks and Recreation Department (BPRD) reviewed the *Planned Development Area* (PDA) and the *Supplemental Information Document* for Suffolk Downs. The proponent also provided a PowerPoint presentation on open space to BPRD and BPDA on April 25, 2019.

BPRD previously reviewed the *Expanded Environmental Notification Form* and the *Expanded Project Notification Form* in a letter dated February 2, 2018; and the *Draft Environmental Impact Report* and the *Draft Project Impact Report* in a letter dated December 17, 2018. The proponent provided responses in the *Supplemental Information Document* and the presentation on April 25. However, significant issues related to open space remain open for resolution:

1. An understanding of the amount and type of active recreational facilities that are needed to serve the new neighborhood and beyond.
2. The mechanism to codify the active recreational facilities that have been proposed to ensure that they are provided as the development proceeds.
3. The mechanism to permanently protect the open space that has been proposed for stormwater management, PDA mitigation and the MEPA Public Benefits Determination.
4. The phasing of the open space system that is proposed above, to ensure that the public benefit is realized in the near term and is not impacted by future amendments to the plan.

Development Program

The proponent is seeking approval of a PDA to allow for residential use and variances from existing zoning and to establish the mitigation of impacts and corresponding contributions to offset the development program. The provision of open space is part of that mitigation.

The *Supplemental Information Document* states that the project will include approximately 7,000 – 10,000 housing units within Boston with the final number to be determined in the future in relation to market forces. There will also be approximately 3,000 housing units in Revere.

The project is estimated to accommodate 15,720 residents (11,370 in Boston). There will be an estimated 22,090 office, retail and hotel employees (11,670 in Boston). The estimated number of other users such as customers, clients and other visitors was not readily available.



Boston Parks and Recreation Department

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

Open Space Framework

The proponent states that it will provide over \$80 million for an open space system for the development that will also be accessible to the public. *It is not clear how this value is quantified.*

The project will include 40 acres of open space, with 27 acres in Boston. Of the 40 acres, there will be 21 acres of active open space; 16 acres of passive open space which are largely wetland areas that will be engineered to control flooding; and 3 acres of civic plazas.

The proponent presented conceptual plans for active recreational uses throughout the development such as a soccer field, basketball courts, tennis courts, pickleball, spike ball, bocce courts, tot lots, and open field areas for Frisbee, picnicking and other activities.

The submittal notes that the project will provide 1.34 acres per 1000 residents of opens space suitable for active recreation. The East Boston neighborhood is currently underserved by public parks suitable for active recreation with a ratio of 1.31 acres per 1000 residents. This is less than the city average of 3.24 acres per 1000 residents.

The project will have a 15-20 year buildout. The phasing for the open space is proposed as follows: 27% will be developed in Phase 1; 34% will be developed in Phase 2; 19% will be developed in Phase 3; 17% will be developed in Phase 4; and 26% will be developed in Phase 6.

Needs Analysis

An analysis based on the population at full buildout will help determine the amount of active recreational facilities needed to serve the development. Constructing a new neighborhood, especially on the edge of the city with limited access to other city amenities, requires a comprehensive approach to open space planning. BPRD has evaluated other Boston neighborhoods with approximately 10,000 housing units to determine the quantity and diversity of recreational facilities that should be accommodated within the 40 acre open space system.

BPRD offers the following guidance to help inform the planning and design of the open space system within the proposed redevelopment. The average number of active recreation facilities for Boston neighborhoods of about 10,000 dwelling units / households is as follows:

Multi-use / soccer fields	3
Ballfields 60'	3
Ballfields 90'	1
Basketball courts	4
Tennis courts	3
Playgrounds	5

Open space amenities beyond those listed 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. With a 40 acre open space system, a fully developed recreation program can be accommodated within this new neighborhood.

East Boston's open space system is owned and operated by three different entities: Boston Parks and Recreation Department; MassPort; and the MA Department of Conservation and Recreation (DCR). The neighborhood has four City parks with athletic fields: East Boston Memorial Park, LoPresti Park, American Legion Playground, and Noyes Playground. Massport owns Festa Field and DCR has two ballfields at Constitution Beach. Between these three agencies, the East Boston neighborhood of 46,655 (16,286 households) is served by the following existing facilities:

Playgrounds: 12 total (school facilities not included)
3887 people per playground
1357 households per playground

Water Spray: 8 total
5832 people per spray feature
2035 households per spray feature

Basketball Courts: 10 total (school facilities not included)
4665 people per basketball court
1628 households per court

Tennis Courts: 6 total
7775 people per tennis court
2714 households per court

The proposed open space system at Suffolk Downs should maintain or improve these ratios.

Active Recreational Uses

The proponent provided a presentation on open space to BPRD and BPDA on April 25, 2019 which included conceptual plans with a mix of active recreation uses such as a soccer field, basketball courts, tennis courts, pickleball, spike ball, bocce courts, tot lots, and open field areas.

The proponent should provide the mechanism by which it will codify the active recreational uses that are shown on the conceptual plans to ensure that they are constructed at the level shown to serve the active recreational needs of the new neighborhood and beyond.

Protection in Perpetuity

The *Supplemental Information Document* notes that 25 percent of the site will be publicly accessible open space, with 27 acres in Boston and 13 acres in Revere, which will all be available to Boston residents. The proponent values this open space at \$80 million.

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

The proponent has noted that the open space will be operated and maintained by an association of Suffolk Downs building owners. This commitment will be set forth in and enforceable pursuant to the PDA Documents for the project, including the Master Plan PDA and the PDA Development Plans for each phase. The MEPA documents and Revere Special Permit also detail the Proponent's commitments respecting open space at the site.

BPRD notes that the PDA and any MEPA documents are subject to amendment and are not binding when it comes to the permanent protection of open space. BPRD requests that open space that is proposed for stormwater management, negotiated as mitigation for a PDA, or approved as a public benefit by the EOEEA, should be permanently protected through conservation restrictions approved by the EOEEA or through transfer to public ownership.

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.

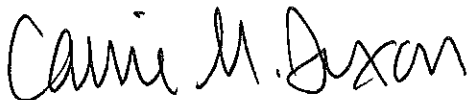
Phasing of Open Space

The project will have a 15-20 year buildout. The *Supplemental Information Document* notes that the open space will be phased with the rest of the development, and that it is not feasible to construct the entirety of the open space network as part of the first phase of the project.

BPRD request further consideration of the phasing of the protected open space to ensure that the public benefit is realized in the near term and is not impacted by future amendments to the plan.

BPRD looks forward to working with BPDA and the proponent on the resolution of the above.

Sincerely



Carrie Marsh Dixon, 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
Tim Czerwienski, Project Manager, BPDA

**Boston Water and
Sewer Commission**



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

May 30, 2019

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: Mr. Czerwienski:

The Boston Water and Sewer Commission (Commission) reviewed the Supplemental Information Document (SID) for the Suffolk Downs redevelopment project located in East Boston. The SID was prepared in response to the Request for Supplemental Information (RSI) issued by the Boston Planning and Development Agency (BPDA). The Commission reviewed the Draft Environmental Impact Report / Draft Project Impact Report (DEIR/DPIR) for this project and submitted comments to the BPDA on December 14, 2018.

The SID present changes to the project since the DEIR / DPIR filing. Changes to the project consist of, reducing commercial space and increasing residential space, changes to the site plan and building massing, additional indoor and outdoor civic space, expanded energy conservation and transportation improvement.

On April 30, 2019, the Commission submitted comments to your office on the Planned Development Area (PDA) for this project. In that letter, the Commission raised the subject of the need for a sewer lift station and its ownership and maintenance responsibilities. That question was not addressed in the SID. The Commission will continue to work with the developer's team on issues relating to the water and sewer infrastructure needed to serve the new development. However, final ownership of on-site sewer and water related facilities should be addressed in the Final Project Impact Report.

Thank you for the opportunity to comment on this project.

Yours truly,

A handwritten signature in blue ink, appearing to read "John P. Sullivan".

John P. Sullivan, P.E.
Chief Engineer

JPS/ra

cc: T. O'Brien, MHDC
M. Connolly, MWRA
M. Zlody, BED
C. McGuire, BWSC
P. Larocque, BWSC



The Commonwealth of Massachusetts
MASSACHUSETTS SENATE

SENATOR JOSEPH A. BONCORE

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June 9, 2019

Mr. Tim Czerwinski, Project Manager
Boston Planning & Development Agency
Boston City Hall
1 City Hall Square, 9th Floor
Boston MA 02210

RE: Comments: Suffolk Downs Redevelopment Project

Dear Mr. Czerwinski:

I write to you with regard to the Suffolk Downs Planned Development Area. The Suffolk Downs project, situated on a 162 acre lot, is the largest development site in Boston. The impacts it will have on this community will be proportionally substantial. The residents of East Boston have in recent years faced challenges related to transportation, environmental resiliency, and economic affordability. When considering the Suffolk Downs project, it is of vital concern that the issues of transportation, affordability, and environmental sustainability, and their impact on East Boston, be thoroughly evaluated.

East Boston is a diverse community comprised of blue collar families, immigrants and young professionals that are currently facing many challenges. Examples of these issues include scarce affordable housing, displacement of families, and dislocation of small businesses, severe traffic congestion and a lack of both before-and-after school programming for the youth, and the persistent threat of climate change. We are hopeful that the development of Suffolk Downs will help address existing needs without creating new problems for the area. In this letter, we outline guiding principles and recommendations for the development as a whole that would greatly benefit Suffolk Downs host communities and help to ensure the overall success of the project.

Our constituents in East Boston face a number of challenges with public transit infrastructure, traffic congestion, and connectivity to the rest of Greater Boston. Improving transportation infrastructure in East Boston is critical to improving the quality of life. Further, it will ensure connectivity to areas such as downtown, Cambridge, and the Seaport will support economic development and opportunity. When fully built, the Suffolk Downs site will be home to thousands of units of housing and a number of businesses, retail spaces, hotels, and restaurants. Public transportation in the area is hindered by a number of issues: the lack of a direct connection between the Blue Line and Red Line, the need for infrastructure and capacity upgrades along the Blue Line, the lack of a harbor ferry system, the need for improved bus service and bus rapid transit (BRT), and the limits of late-night options. HYM has proposed to treat the Blue Line as the “front door” to the redeveloped Suffolk Downs site, but needs to put a major emphasis on public transportation and a forward thinking transit-oriented development plan that supports the needs of East Boston community necessary. HYM’S Investment in public transportation in the region is critical to ensure the economic success of East Boston.

Equally as important is the vehicular traffic along the densely populated and heavily congested Route 1A. East Boston has seen, in recent years, an influx of congestion related to north shore commuters and airport traffic, most significantly a sharp rise in the number of transportation network company (TNC) rideshares in neighborhood streets. This traffic has not only extended up Route 1A and at the mouth of the Sumner Tunnel, but has backed up neighborhood streets as navigation apps like Google Maps and Waze direct drivers off highways and onto local roads to follow the path of least resistance. This idling traffic decreases quality of life, hurts our economy by reducing productive work hours, and contributes to the burden of air pollution, already substantial due to vehicle activity at Logan Airport. Much deeper scrutiny should be applied toward the impact of expanding highway lanes on Route 1A adjacent to Suffolk Downs and the effect it will have on vehicle count as well as congestion. Rather than expanding road space for single rider vehicles on route 1A, attention must be directed towards priority lanes for multi-passenger vehicles. Further 1A and this development should be looked at as a transportation link between bus trips north of the city and the blue line. We need to curb congestion in this region and get people out of their cars and into the public transportation.

Thoughtful development is critical to promoting climate resiliency. An environmental justice community, East Boston is particularly susceptible, and has already been impacted by, the effects of climate change. Bordered by Belle Isle Marsh, the shoreline, and Chelsea Creek, any development at Suffolk Downs must place resiliency at the forefront of their planning process. To ensure the sustainability of the development, Suffolk Downs must be ready for the impacts of climate change, and must provide protections to the existing shoreline, Belle Isle Marsh, and a restored Sales Creek. All efforts should be made to ensure that the Suffolk Downs development is energy efficient, and that buildings are constructed to the highest LEED certification standards. Additionally, East Boston has placed a strong emphasis on the maintenance of green space in these heavily urban environments. Continued commitment to the beautification of this community and increasing access to open space can be achieved through Suffolk Downs. The Suffolk Downs team has been proactive at making climate resiliency a top priority and coming up with a plan of action for dealing with climate change and flooding at the site. We urge that this focus be continued with the highest diligence.

Over the past several years East Boston has seen a steady increase in housing prices, with both rental and ownership options becoming both scarcer and less affordable to the average resident. Massachusetts is experiencing a housing crisis due to a lack of adequate affordable and moderate-income housing. East Boston has a substantial working class community as well as a vulnerable low-income population, both negatively affected by trend. In spite of a development boom in Boston that has increased the number of new units in the city, not enough has been done to provide affordable options for existing residents. More expensive developments have contributed to the increasing cost of rent prices East Boston, as well as contributing to an increase in overall emissions. The development at Suffolk Downs may have similar effects. As the single largest contributor of new housing Greater Boston, Suffolk Downs needs to play a positive role in the housing crisis by increasing the number of planned affordable units. Suffolk Downs' goal, and the goal we must have for the project, is for it to become a part of these neighborhoods instead of an insulated island between them. To become part of these communities, it is essential that Suffolk Downs make more units accessible to the people who live and work in East Boston and who are in need of expanded affordable housing options.

Though we remain optimistic about the potential for this project, we want to ensure that it remains an open and transparent process with adequate opportunity for review and community input. Thank you for your consideration of our comments on this project. HYM has thus far been a valued partner in this project and we look forward to working with all stakeholders to ensure that what is built at Suffolk Downs benefits the community and residents for the short term and long term.

Thank you for this attention to this matter. Please do not hesitate to reach out should you have any comments or questions.

Sincerely,



Joseph A. Boncore
Senator

First Suffolk and Middlesex



Tim Czerwienski <tim.czerwienski@boston.gov>

Fwd: Suffolk Down development project

Lydia Edwards <lydia.edwards@boston.gov>

Wed, Jun 12, 2019 at 3:14 PM

To: Tim Czerwienski <tim.czerwienski@boston.gov>, Ricardo Patron <ricardo.patron@boston.gov>, Joel Wool <joel.wool@boston.gov>, Gabriela Coletta <gabriela.coletta@boston.gov>

----- Forwarded message -----

From: **Sonja Tengblad**

Date: Wed, Jun 12, 2019, 3:06 PM

Subject: Suffolk Down development project

To: <lydia.edwards@boston.gov>

Dear Counselor Edwards,

I realize the comment period for the Suffolk Downs development project has closed, but I still want to express my concern for a few areas (as Rep Madaro said we can still do so through his office, yours, and the BPDA):

#1 = we shouldn't be building new structures that aren't Net Zero and Climate Resilient. Our planet simply can't take any more new buildings that are causing it harm; they need to be energy efficient and solar-ready.

#2 = we need more affordable housing. I know you are an advocate of this, and I thank you for that!

This could be a model development in an Environmental Justice Community. As a new mom who is late to the climate change and environmental justice scene, I also realize that I'm very late in the process to this whole development project! But never too late to voice my concerns.

Two things about me personally: 1) I'm launching the **Mothers Out Front** East Boston Chapter this summer, and 2) I will also be at your benefit for your new Edwards Empowerment Fund Scholarship (although I'll be late). Thank you for such a great initiative, and for honoring the Maverick Mothers who did so much for our community.

Thank you!

Sonja

(Maverick Square)

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BeatSong project (Soprano|Percussion Duo):

www.beatsong.net



Tim Czerwienski <tim.czerwienski@boston.gov>

Suffolk Downs Needs an Extension in the Public Comment

stephen m

Tue, Jun 25, 2019 at 9:53 AM

To: tim.czerwienski@boston.gov

Tim,

Sorry I did not write this sooner, but given the revelation of both the BPDA having the information on William Bruce Harrison and that it recently came to public awareness, these process needs a much longer extension on the public comments, specifically since the math does work in terms of more affordable housing. A billionaire that is no a resident of Boston is deeply need to be held to account. If the BPDA thinks that a billionaire has the interest of our city at heart not only are you failing as a Boston agency, you are failing Boston and giving into real-estate developers and not the residents that live or rather try to live here.

--

~stephen
he/him

 **pEpkey.asc**
2K