



Boston City Council

LYDIA EDWARDS  
Councilor - District 1

October 23rd, 2019

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

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

**Re: Suffolk Downs Project, Planned Development Area**

Director Golden, Mr. Czerwienski:

Thank you for the opportunity to comment on the amended Suffolk Downs proposal. As the project continues to evolve, I appreciate the willingness of the Walsh administration, BPDA and HYM Investment Group, LLC to participate in continued and creative dialogue to address critical challenges related to housing affordability, transportation and climate change.

Before discussing the Suffolk Downs project and the amended PDA Master Plan, I am requesting all materials on the project be translated and made available in Spanish in a timely fashion. Multi-lingual availability of project documents should be normal and routine for Suffolk Downs and for other projects impacting the East Boston community. Where matters are extremely time-sensitive or pending before the BPDA board, an intelligible and complete Spanish-language accounting of changes, issued in a separate document, may be practicable in order to quickly and effectively communicate updates and allow for full participation of and response from the community. Regardless, as noted, translated materials should be made available swiftly enough so that they can be accessed by the public during the review process.

**Fair Housing and Non-Discrimination:**

As the City, BPDA and project proponent continue to define the housing plans on site, including income-restricted housing development and contributions, it is critical that certain measures, substantive and procedural, be memorialized in the PDA and in separately executed legal

documents. The proponent has made progress in this direction by amending the Non-Discrimination Covenant to include omitted classes of protected groups. This is an important and appreciated step.

In a May 31, 2019 comment letter from my office,<sup>1</sup> I cited fair housing concerns based on the unit count and size, affordability levels and the stark contrast with immediately proximate census tracts as well as the East Boston community at large. The revised project has come closer to addressing concerns by adjusting inclusionary development requirements to secure more income-restricted family or three-bedroom units (*PDA Master Plan Redline, page 14, item a.*) and increasing overall resources dedicated to housing on-site and off-site in East Boston through a Housing Stabilization Fund (*page 14, item c.*) and a tentative infrastructure 1:1 match agreement (*page 15, item e.*). Additional steps are nonetheless necessary on the part of the proponent and the BPDA itself.

This month, my office released a report, *Planning for Fair Housing*,<sup>2</sup> making broad recommendations for the BPDA with regard to fair housing and planning to mitigate displacement. Some of these recommendations and learnings from the report could be applied immediately and impactfully throughout the Suffolk Downs PDA. Notably, the City of Boston is presently currently working to finalize its Affirmatively Furthering Fair Housing (AFFH) plan. As the AFFH plan is issued for public comment and as it evolves, strategies for affordability in the largest development in Boston, and review over the span of development, are essential.

To that end, any approval for Suffolk Downs should contain an explicit acknowledgement and commitment by the City and BPDA that (1) the BPDA will participate in and work in furtherance of the city's plans regarding Affirmatively Furthering Fair Housing; (2) that such efforts will include ongoing work over the development of Suffolk Downs to eliminate barriers to housing opportunity for protected classes and groups vulnerable to displacement; and (3) that the developer, city and BPDA will review housing and fair housing issues over the course of development, during each phase and upon the filing of any PDA amendment. These items should be reflected in the PDA under sections regarding Housing (e.g. pages 13-16) and Amendment of the Master Plan (19) and carried through any comparable sections in each Phase.

### **Income-Restricted Housing:**

Overall plans for income-restricted housing have been aligned, through a variety of means and including both on-site housing, off-site housing, land and housing fund contributions, and

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<sup>1</sup> Letter available at [bit.ly/suffolkdownsmay2019](http://bit.ly/suffolkdownsmay2019)

<sup>2</sup> See report at [bit.ly/planfairhousing](http://bit.ly/planfairhousing)

infrastructure match funds, to reach 20% of housing. The partnership of all parties in making this requirement feasible is commendable.

The Planned Development Area filing should, however, specify the 13% income-restricted housing on-site and 20% income-restricted housing overall as a floor, overall and for each phase. Additionally, the proponent and BPDA should establish revenue marks above which the proponent agrees to make additional and proportionate investment in affordable housing.

The proponent should amend the initial paragraph of the Housing section of the PDA Master Plan filing (*pages 13-14*) to read:

10. Housing. The Master Project includes the development of approximately 7,474,000 square feet of residential space (including accessory uses thereto), including both for sale and rental units. **The Master Project intends to create, fund or facilitate the development of income-restricted housing equivalent to at least 20% of units or residential square-footage on-site, through the combination of housing units on-site and contributions of land, financial support and other means determined in partnership with the BPDA.** At least 10% of the total amount of residential space shall be senior housing. The Master Project intends to set aside **at least 13%** of the total number of units (or, at the BPDA's election as set forth below, **at least 13%** of the square feet of residential space) as affordable units under the Mayor's Inclusionary Development Policy housing program under the Mayor's Order Relative of Inclusionary Development dated December 9, 2015 (the "IDP"). Included in the total number of affordable units, 13% of the senior housing units (or, at the BPDA's election as set forth below, 13% of the square feet of senior housing space) will be affordable units under the IDP. The Proponent shall enter into a Master Affordable Housing Agreement with the BPDA for the entire Master Project, which shall provide for a separate Affordable Housing Agreement to be executed by the owner of each residential building prior to issuance of a building permit for that building. Each building that includes residential uses shall provide the affordable housing units on site as required by the IDP, or subject to the approval of the BPDA, the Proponent may redistribute the affordable housing units to other buildings or provide the affordable housing at an off-site location. **The proponent agrees further to establish, in collaboration with the BPDA, a projected revenue target or investment rate of return which, if exceeded, will trigger additional and proportionate contributions to affordable housing.**

To expand on this point, the proponent has indicated it intends to retain holdings of the majority of the property during the development and steward the creation of a community at Suffolk Downs. This verbal and long-term commitment to neighborhood development is appreciated.

However, to protect the public interest throughout variable economic conditions or potential changes in ownership, the City and BPDA should seriously consider the establishment of value capture mechanisms triggered upon resale of property at Suffolk Downs or appreciation beyond a capped amount, particularly as public agencies look toward collaborative strategies for investment to support infrastructure development. Both regulatory approval and public investment will undoubtedly impact land value in the area.

The proponent identifies inclusionary units will achieve an average of 70% AMI, with units restricted at levels no higher than 80% AMI (*page 14, item b*). The project proponent should clarify, based on the most recent filing and any subsequent updates during the planning process, the anticipated number, distribution and income ranges of income-restricted housing units.

As noted in the May 10 comment letter, the median income of East Boston is closer to 50% AMI and renters and communities of color across the city tend toward 30-40% AMI. While the creation of a Housing Stabilization Fund is an important step for East Boston today, the City, BPDA and proponent should ensure housing on site is available to a diverse and representative body of residents at a range of incomes.

In order to achieve that end, the proponent should open up and clarify financial assumptions for development on-site and partner with the city in identifying strategies for the production of units at 30% and 50% AMI levels. This may include seeking housing trust or CPA funds, leveraging portions of the infrastructure 1:1 match to “buy down” affordability on-site, or other strategies. The city and BPDA, in reviewing the project, must balance off-site strategies — which may be cost-effective and assist in preventing displacement — with fair housing obligations in and around Suffolk Downs.

The proponent should amend the PDA filing (*page 14, item b*) to read:

“B. At the discretion of the BPDA, the Proponent has agreed to provide the on-site affordable rental units at an average of **no more than 70%** Area Median Income (“AMI”), instead of providing all such units at 70% of AMI. The maximum AMI of any individual affordable unit would be no more than 80% of AMI, **and the Proponent will, throughout the course of development, partner with the City on strategies, including pursuit of private, city, state and federal funding streams, to produce income-restricted units at lower median incomes (i.e. 30% / 50%) in furtherance of the city’s Affirmatively Furthering Fair Housing plan.** This change from what is typical practice under the IDP is allowed in this area of the City and will assure that residents with incomes below 70% of AMI can be served and can access housing at Suffolk Downs.”



For its part, the City of Boston, in partnership with the BPDA and the proponent, can continue to explore strategies to help make deeper affordability a reality. For example, the City could issue bonds or dedicate Phase 1B property tax revenues to help finance housing, transportation or water and sewer infrastructure in future phases, seeking legislative authorization to do so if necessary.

### **Jobs and Economic Development**

Suffolk Downs will be an economic boon for the municipality of Boston—what is critical is that the economic benefits are shared among a diverse and representative range of Bostonians, particularly East Boston residents.

My office has met with multiple stakeholders and hosted a community meeting attended by hundreds of individuals to solicit additional feedback regarding jobs and economic development at Suffolk Downs. In the May 10 comment letter, I also recommended an upfront contribution toward ESOL education to support job readiness, matching city / BPDA research on barriers to entering or advancement in the workforce as well as public testimony on the experience of workers of Limited English Proficiency seeking employment at large employers like Encore Boston Harbor. I reiterate those comments. It is my understanding that the developer does intend to contribute toward ESOL education, and to make additional workforce preparedness contributions through business partners. These contributions should be memorialized in the PDA Master Plan (e.g. on pages 16-18 and in Exhibit J) and elsewhere as appropriate.

Pursuant to Development Impact Project (linkage) requirements, the proponent will make contributions to the Neighborhood Jobs Trust (NJT). The proponent has also committed to 10% of retail space leased to local businesses with “flexible lease parameters” on site (*J-2, public benefits*). I appreciate that the City and proponent have facilitated early discussions with minority-owned businesses and am hopeful that the proponent, BPDA and Office of Economic Development will clarify and develop strategies for inclusive economic participation, including defining at least a process for discerning standards for lease parameters or other facets of entrepreneurship on site.

Several stakeholders have approached my office with creative ideas for economic development or for use of jobs linkage funds. The proponent and BPDA should evaluate the merits of alternative compliance with linkage in the PDA, including strategies that fund ESOL, prepare residents for health or transportation careers, support worker cooperative development efforts (such as East Boston’s Center for Cooperative Development and Solidarity / Centro Cooperativo de Desarrollo y Solidaridad) or other initiatives. The proponent and BPDA could also explore

reserving a portion of jobs linkage compliance for targeted projects in East Boston relevant to the full and equal economic participation of a diverse constituency.

### **Sustainability Strategies**

My office is in receipt of questions and concerns regarding attainment of the goals in Boston's Climate Action Plan, greenhouse gas emissions from buildings in Boston, net zero development standards and related issues. Acknowledging the earlier improvements the proponent has made in consultation with the BPDA and Department of Energy Resources, it is critical that all stakeholders focus clearly on city goals and a pathway toward net zero. To that end:

1. Project buildings, components or phases that are solar-ready, net zero-ready or otherwise prepared for future sustainability initiatives should have a periodic review mechanism or safeguard so that the city can both support and expect a transition to net zero. The proponent has noted incentives for certain renewable energy programs are both evolving and variable, and to accommodate this, the city and proponent should have a clear strategy for pursuing deeper sustainability measures and advocating for them.
2. Measures that would substantially increase gas infrastructure are not likely to be compatible with city and state climate change efforts, and the city should take several steps to ensure efforts towards district energy do not unintentionally thwart the plan for carbon neutrality.

### **Belle Isle Marsh**

My office is also in receipt of questions and concerns regarding the future of Belle Isle Marsh and how the development at Suffolk Downs will impact its ecosystem and natural function as a flood barrier. Belle Isle Marsh is an irreplaceable environmental asset. Harmonious development may benefit from the marsh's natural buffer against climate-induced weather impacts, and may allow for increased public enjoyment of the marsh itself. However, the development should also have plans to handle extreme precipitation, including plans to prevent environmentally deleterious effects on the marsh and its ecosystem, and to responsibly guide residents and visitors to enjoy the natural environment without causing undue damage to it.

In partnership with the Executive Office of Energy and Environmental Affairs and Massachusetts Environmental Policy Act Office, the city and developer must clearly assess the impacts of development on the marsh and collaborate on protection for it. Additionally, the Friends of Belle Isle Marsh should be formally, regularly and meaningfully consulted on aspects of the development that impact, mitigate impacts on or allow for greater public enjoyment of the marsh.

## **Transportation**

Based on the updated filings, the proponent has, in consultation with MassDOT, eliminated the proposed third southbound lane on Route 1A (*Suffolk Downs Additional Information Document, 11 - 12*). Additionally, cost savings from this change will be directed toward the public transit system.

I am firmly opposed to highway expansion and appreciate the shift in transportation mitigation. The proponent should, however, clarify the amount or value of mitigation redirected toward the public transportation system and identify which projects it is funding. For example, it will be important to understand whether the mitigation is primarily directed toward capital improvements of area stations, improving or increasing bus or subway service, or other measures.

The quantity of parking at Suffolk Downs, while reduced, and projected vehicle trips remain substantial and concerning for a site adjacent to public transit and in a metropolitan area stifled by congestion. Monitoring parking and pursuing additional and future efforts at parking reduction will be essential. Even assuming a high quantity of cars and vehicle trips, the proponent should also take strong steps to minimize vehicle pollution.

The current proposal has modest plans for electric vehicle charging stations, sustainable transit and alludes to future transportation demand management strategies. Increasing the base number of electric vehicle charging stations, facilitating procurement of electric vehicles for lessees or identifying partnerships to do so, and aggressively promoting bus, shuttle and subway services are critically important.

Finally, certain presentations and transportation modeling have suggested the MBTA Blue Line is already prepared to carry a much higher quantity of passengers. Respecting the proponent's views and the MBTA's own analysis of capacity, residents have reported crowded conditions at peak hours and overall transportation planning will likely require investments to increase capacity or service frequency on the Blue Line.

## **Clarity on Security Protocols, Implicit Bias Training**

The proponent has indicated that public safety at Suffolk Downs will primarily rely on the Boston Police Department and will not operate a separate, private police force. Some abutters have also expressed concerns at community meetings about security prior to and during the development phase, particularly while the site is primarily vacant, and the proponent has responded with assurances that security will be on site.

Ensuring the public safety of residents, is, of course, important. In order to ensure fair and equal treatment of all community members, any security operation on-site should be clearly informed on the public's rights in public and private spaces, including public easements, aware of distinctions between their private role and that of police officers, and should also be trained in implicit bias. In the period between now and the establishment of a residential community, it would also be helpful for the proponent to establish clear channels of communication regarding security on site in order to expeditiously resolve resident concerns.

Thank you for the opportunity to comment on the Suffolk Downs development, and I look forward to continued progress on its design.

Regards,

A handwritten signature in cursive script, appearing to read "Lydia Edwards".

Lydia Edwards

Boston City Councilor, District One

**Boston Water and  
Sewer Commission**



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

October 9, 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 Additional Information Document (AID), and its appendices and attachment for the Suffolk Downs redevelopment project located in East Boston. The AID was prepared in response to the Request for Additional Information (RAI) issued by the Boston Planning and Development Agency (BPDA). The Commission's most recent letter to the BPDA is dated May 30, 2019 provided comments to the BPDA on the Supplemental Information Document (SID) for this project.

The AID and supporting documents, described changes to the project since the filing of the SID. The additional information provided was related to issues that do not have direct impact on the Commission's Site Plan requirements. However, the additional information in Attachment 1 indicates that Right-of-way easements will be granted to the City of Boston for the streets shown in Exhibit C-1. If the City agrees, the Commission is required, by mandate, to own and maintain the street drainage system. The Commission's ownership and maintenance responsibilities will begin after the Right-of-way is granted to the City. However, drainage of private property will remain the responsibility of the property owner and will require a separate privately owned drainage system.

One topic that was not addressed in the AID was ownership of the wastewater collection lift station that is needed to pump wastewater from the site to the Commission's collection system. Ownership, operation and maintenance of the wastewater lift station will be the responsibility of the Developer or a building owners association established by the Developer. The wastewater lift station is one of many critical components to the viability of this project. As such, the approved PDA Master Plan should address this issue.

Commission held a meeting with the Developer's team in early September of 2019 regarding issues relating to the sewer and drain infrastructure needed to serve the new development. At the meeting, the following points were discussed:

1. Routing wastewater generated by the project to the MRWA pump station via the Commission's collection system.
2. Site stormwater will be discharged to either Sales Creek or the Chelsea River.
3. Ownership of street and the storm drain system and the requirements for the Commission to assume ownership of the new sewers and drains.



4. The Commission's Site Plan requirement for developers to retain 1.25 inches of rainfall on site.

The Commission looks forward to working with The McClellan Highway Development Company team to resolve of water, sewer and drain issues in a timely way.

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  
C. McGuire, BWSC  
P. Larocque, BWSC

October 15, 2019

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

Re: Suffolk Downs Project – via email c/o Mr. Tim Czerwienski  
Recommendation and Request for 90 Day Time Extension, Spanish Translation  
Comment on Additional Information Document

Dear Director Golden:

With regard to the development proposed at Suffolk Downs in East Boston:

We have reviewed project documents, most recently the Additional Information Document of September 16, 2019 and supporting materials including the Planned Development Agreement Master Plan redline.

Critically and as an immediate priority action, we recommend and request that you and the Agency extend the current comment period for not less than 90 days and require that the proponent prepare and post a complete Spanish translation of the Additional Information Document during the first 30 days of this extended period.

Fostering informed, meaningful community participation in project review is an essential responsibility of public agencies.

Failure of BPDA to fulfill this basic review period requirement for Spanish-speaking residents of East Boston - among our neighbors most harmed by 10+ years of speculative luxury housing development and at risk of further displacement by the Suffolk Downs project as proposed – is unfortunate and requires immediate corrective action.

To summarize our comments, we conclude that significant issues remain unresolved for the Suffolk Downs proposal. These unresolved issues involve basic project elements of affordable housing and displacement, transportation, and climate change resiliency, encompassing environmental justice, open space and natural resources.

In topic areas where we are not experts, we defer to and support the comments provide by individuals and groups working to further equitable, sustainable development.

Specific deficiencies of project materials and City process are list on the attached.

In light of these significant unresolved issues, project documents are not sufficient for BPDA to certify the Project Impact Report as complete and do not support a finding of net public benefit for a PDA agreement as required by Article 80.

Sincerely  
*Allandale Coalition*  
FoAW Coalition

**Suffolk Downs Development Proposal**  
**FoAW Coalition– Detail Comments October 15, 2019**

**Summary of Significant Unresolved Issues**

**1. AFFORDABLE HOUSING.**

1. Key assumptions and specific quantitative elements of affordable housing program are not stated, thus meaningful, comprehensive evaluation and comment cannot be made;
2. Project will achieve 15% affordability under reasonable first-order assumptions, falling far short of Boston resident needs (see Table 1);
3. Measure of housing affordability does not reflect East Boston and City of Boston household income reality; AMI should be blended hybrid of neighborhood and City;
4. Housing program does not include an equity-building program for qualified renters.

**2. ENERGY USE, CARBON NEUTRALITY & ZERO NET CARBON BUILDINGS**

1. Project does not include enforceable provisions to achieve Mayor Walsh’s commitment to Zero Net Carbon;
2. The proponent should build a model project that operates as a net-zero independent microgrid powered by 100% renewable energy produced on site;
3. “PV-Ready” is not enough; the proponent should commit to constructing solar arrays across all viable roof space.

**3. TRANSPORTATION**

1. Project does not include any enforceable provisions to achieve Mayor Walsh’s mobility and mode shift goals;
2. Project should establish enforceable provisions tailored for site’s proximity to public transit, with 50% non-private vehicle use Mode Share.

**4. CLIMATE, RESILENCY & NATURAL SYSTEMS**

1. Project excess reliance on engineered solutions to address climate change and sea level rise;
2. Project engineered solutions make no provision for future migration of Belle Isle Marsh; project as designed consigns Belle Isle Marsh to extinction; this direct impact is not acknowledged.

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**Suffolk Downs Development Proposal**  
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**Summary of City Process & Project Review Deficiencies**

1. The project as a whole and in its specific elements replicates an obsolete development approach;
2. The development approach is site-specific, context-free maximization of profit for the benefit of private owners;
3. This approach triggers significant individual and cumulative external costs, which are not acknowledged or quantified;
4. The project draft agreements show throughout minimum necessary compliance with the City’s stated public benefit goals;
5. Where additional benefits are offered they are incremental add-ons – often adjusted by subtractions elsewhere – typically provided to mollify individual constituencies while leaving the fundamental site-specific profit maximization model intact;
6. Multiple supplementary agreements and on-going parallel negotiations are not fully disclosed in draft or final document form, enabling comprehensive public review and comment;
7. Project agreement language is replete with generic, unenforceable promises; significant project elements are relegated to a future time post-approval, preventing officials, agencies and the public opportunity full review of all relevant project elements;
8. Rationale that “the numbers don’t work” - advanced to show purported infeasibility of requested public benefit measures – are not testable by any evidence given;
9. Project agreements are enforceable only by the Development Agency, no third-party or community-based organizations have powers of enforcement;
10. “Moving Target” project description, where-in documents released for review do not fully describe all relevant project elements;
11. Failure to provide independent technical advisory services to residents, whose layperson local knowledge is uniquely valuable but may not be readily translated into terms that can generate effective comment and beneficial project modifications;
12. Failure to provide materials in multiple languages and translation / explanation services to residents of environmental justice and climate justice communities.

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**Suffolk Downs Development Proposal**  
**FoAW Coalition- Detail Comments October 15, 2019**

**1.0 AFFORDABLE HOUSING.**

Applying first order-of-magnitude assumptions, we estimate that the affordable housing measures proposed will result - at most - in 15.0% of total project units being designated as affordable. See Table 1. (Attachment).

Measures proposed fall far short of providing the enforceable commitments required to achieve needed affordable housing levels.

Measures listed in the Additional Information Document lack sufficient specificity for evaluation and meaningful comment.

**1.a Action Required** -> The proponent must quantify in a Table and provide supporting narrative for all key assumptions for all Affordable Housing elements.

**1.1 HOUSING STABILIZATION FUND**

a. Amount of housing stabilization fund not specified, other than a reference in 1.4: "The Proponent has agreed to provide a contribution of five million dollars (\$5,000,000) towards a housing stabilization fund . . ."

b. Assumption of cost for each unit of affordable housing not specified - whether on an average \$ per sq. ft. basis or other meaningful, testable metric.

c. Administration of fund: no details provided, whether as to fees, costs and the evaluation, selection and performance criteria of administering agent(s).

We note that community-based housing non-profits perform a commendable mission but typically cannot compete with private market buyers as measured by capacity to respond quickly when purchase opportunities may present themselves.

**1.2 LINKAGE: DEVELOPMENT IMPACT PROJECT:**

a. Amount of Housing Exaction projected payment needs to be provided, with underlying assumptions clearly stated. We estimate the amount at \$28.0 million, based on projected applicable square feet less exclusion and application of the current per square foot rate.

b. As above: Assumption of cost for each unit of affordable housing not specified - whether on an average \$ per sq. ft. basis or other meaningful, testable metric.

c. Administration of fund: no details provided, whether as to fees, costs and the evaluation, selection and performance criteria of administering agent(s).

**1.3 INFRASTRUCTURE SAVINGS, IF OBTAINED, GO TO HOUSING, UP TO A CAPPED AMOUNT AND LESS COST OF OBTAINING.**

a. Amount is not certain and enforceable, but contingent on future effort and a result of a future eventuality with unknown probability.

**Suffolk Downs Development Proposal**  
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- b. Amount of cap is not stated.
- c. Amount eligible for deduction as cost of obtaining to not specified, including whether as net amount, percent of total savings obtained, maximum hourly rate schedule, cap on deduction and so on.
- d. As above: Assumption of cost for each unit of affordable housing not specified – whether on an average \$ per sq. ft. basis or other meaningful, testable metric.
- e. Administration of fund: no details provided, whether by public agency or non-profit, as to fees, costs and the evaluation, selection and performance criteria of administering agent(s).
- f. No enforceable commitment given or monitoring method indicated to ensure that Suffolk Downs infrastructure savings will not be obtained by budget re-allocation from other projects that may have superior cost/benefit, greater resiliency and sustainability metrics, or other public benefit features.

**1.4 IDP:** Inclusionary Development Policy calculated as an average of 70% to allow for some units at lower AMIs will be offset by units at higher AMI.

The assumptions of a range of AMI levels needs to be specified in an explanatory Table.

**1.b Action Required** -> AMI must be measured by a meaningful calculation reflecting a blended hybrid of East Boston and City of Boston individual and household incomes.

## **2.0 ENERGY USE, CARBON NEUTRALITY & ZERO NET CARBON BUILDINGS**

The project agreement as drafted fails to include any enforceable commitment to sustainability and net zero carbon for all buildings on the site.

Sections 11.l and 11.m provides indicate that only a very small number of buildings will meet energy use targets consistent with the City's Climate Ready policies.

Mayor Walsh has made a commitment to achieving carbon neutrality and zero net carbon buildings, as technology exists to achieve these goals.

<https://www.boston.gov/news/plan-carbon-neutrality-and-actions-zero-net-carbon-buildings-released>

**2.a Action Required** -> Proponent must be required to achieve in all phases of the proposed project the same targets as set by Mayor Walsh for new city buildings.

**2.b Action Required** -> The next set of project materials must provide a simple, accurate and complete data table, quantifying the level of project compliance with Zero Net Carbon Building goals.

Project materials summarize constraints on reaching the 100% carbon neutral target, but do not clearly and comprehensively detail why measures to achieve Carbon Free goals are financially or technically infeasible. (*Response to DPIR Comments*, p. 2-70)

## **Suffolk Downs Development Proposal FoAW Coalition- Detail Comments October 15, 2019**

Project materials list a limited set of agreed energy use measures and suggest – but do not clearly state - that Carbon Free Boston objectives will not be achieved.

Subsequent project documents does not include the following Carbon Free analysis, as requested by our previous comment – and consistent with Mayor Walsh’s Climate Ready plans.

### **2.c Actions Required ->**

1. Fully evaluate an immediate Carbon Free Boston program, specifying best available technology and associated costs. (Option A)
2. Fully evaluate a phased Carbon Free Boston program, achieving net zero carbon use for buildings by benchmark dates of 2030 (Option B) and 2050 (Option C). These options should include reconfiguring project build-out, to better allow for solar energy, for example, and rank-ordering regulatory, technical and financial elements needed to achieve phased-in Carbon Free goals.
3. Agree on final recommended Carbon Free Boston compliance, based direct discussions among officials, agencies, public stakeholders and the proponent.

### **Energy Use and Carbon Free Boston Background**

In prior comments, East Boston Impact Advisory Group members recommended meaningful energy use measures to help achieve Carbon Free goals:

“The proponent should build a model project that operates as a net-zero independent microgrid powered by 100% renewable energy produced on site.”

““PV-Ready” is not enough; the proponent should commit to constructing solar arrays across all viable roof space.” (IAG Member letter, December 14, 2018.)

These recommendations implement City of Boston climate change policy. The City seeks to significantly reduce greenhouse gas emissions that contribute to climate change. One essential component of this effort is a 2050 carbon neutral target. *Carbon Free Boston Summary Report 2019* states “The fundamental characteristics of a carbon-neutral city are clear”(p12), including:

- Maximize Efficiency:** Every building is a high-performance building; travel shifts from single-occupancy vehicles to public transit, biking, walking, and shared modes;
- Clean Energy:** Electricity that is 100 percent GHG-free, and it fully utilizes the potential for in-city renewable generation, such as rooftop solar.

City’s Carbon Free report “analysis confirms that Boston needs to embrace efficiency and clean energy in all sectors—*without exception*—to achieve carbon neutrality. It also revealed that early action makes it easier to reach the carbon-neutral target. Many of the technologies we need already exist.” (p. 12)(*emphasis added.*)

## **Suffolk Downs Development Proposal FoAW Coalition– Detail Comments October 15, 2019**

The 30-year Carbon Free planning horizon reflects building and transportation system retrofits needed. Retrofit measures are complex, difficult to mandate for private properties and subject to diminishing return on investment.

New construction and especially phased master plan development as at Suffolk Downs are uniquely able to implement best available technologies while making provision for phasing in new technology to achieve “Carbon Free Boston” goals.

The Additional Information Response states “The proposed density of buildings at Suffolk Downs is out of proportion with being able to achieve Net Zero Energy performance on site.”. The document lists the limited energy efficiency and GHG emissions reductions steps proposed:

- all single-family homes along Waldemar Avenue (12 in total) and all townhomes (22 in total) will be Passive House and/or E+ (energy Positive) equivalent. *Retained in in Exhibit J PDA redline of September 16, 2019.*
- Commitment to install a minimum of 2MW of solar on-site: *appears to not be included in Exhibit J PDA redline of September 16, 2019.*
- All buildings throughout the development will be solar-ready: *appears to not be included in Exhibit J PDA redline of September 16, 2019.*
- Commitment to construct one (1) Passive House (or equivalent) demonstration project of a minimum 50,000 square foot multi-family residential building, first, moved to Phase 1B from Phase 2B; *now appears to have been dropped.*
- Prepare schematic designs and cost estimates of a 200,000 square foot multi-residential building for both a preferred/planned design and a Passive House design: *appears new in Exhibit J PDA redline of September 16, 2019.*

Project materials affirm “increased commitments to energy efficiency and GHG emissions reductions” but do not quantify net compliance with Carbon Free goals. (New/Expanded Green Building Initiatives and Energy Conservation Measures/GHG Emissions Mitigation. 1.2.4.; and page 2-70, Response to Comment 10.5. *Supplemental Reply to Comments. May 1, 2019.*)

Achieving Carbon Free goals is an essential component of the City’s response to climate change. The Suffolk Downs project should be a model development, contributing substantially to City climate change goals, especially as East Boston is among Boston neighborhoods most at risk from climate change.

Subsequent Suffolk Downs documents should include complete and accurate assessment of project compliance with Carbon Free Boston goals.

**2.d Action Required** -> The Planned Development Agreement and its Exhibit J “GHG Emissions” section must include the full suite of measures enabling the project to achieve Mayor Walsh’s stated Zero Net Carbon commitment.

**Suffolk Downs Development Proposal**  
**FoAW Coalition- Detail Comments October 15, 2019**

**3.0 TRANSPORTATION**

In East Boston, traffic congestion and public safety are matters of significant concern.

While evaluating long-term and project-specific transportation issues, immediate steps should be advanced by the City to address existing safety and congestion in East Boston: enforcing designated commuter routes, substantially reducing cut-through in residential streets and installing slow-street/safe-street measures. ( ref. *CBS News* p.9)

For the Suffolk Downs project, increased traffic, congestion, air quality and safety issues must be addressed through a comprehensive transportation plan, transitioning away from private vehicle reliance towards public transit, bicycle, pedestrian and safe, low-impact alternative modes.

The project Supplemental Information Document states:

The Proponent agrees that the Go Boston 2030 mode shares should be utilized. In the DEIR/DPIR, the Proponent provided a separate analysis of “TOD mode shares” to reflect this.

The Proponent is actively working with CTPS to establish future mode shares for the Project. In addition, the Proponent is actively working with the Transportation Working Group, which includes MassDOT, MEPA, MBTA, BPDA, BTD, Massport, CTPS, the City of Revere, and the Proponent and transportation consultants on the proposed mode share and to further define the mitigation program for off-site traffic impacts, as well as transit demand. The DEIR/DPIR provided detail on proposed traffic and transit mitigation, including proposed timing of that mitigation.

Additional details of the proposed traffic and transit mitigation will be Defined in the FEIR. *Supplemental Information Document. 2-10*

Proponent here acknowledges that significant issues remain unresolved for the project’s transportation program.

**3.a Action Required** - >Project documents must provide a comprehensive discussion of how the City’s Mode Share targets will be achieved.

These steps should be included in the Transportation Agreement portion of the overall project agreement document set prepared for BPDA Board consideration.

**3.b Action Required** -> If proponent indicates that the Mode Share target cannot be achieved, the reasons for this projected shortfall should be stated in detail and subject to critical evaluation during direct project review among officials, agencies, public stakeholders and the proponent.

Within the Mode Share analysis, the question of existing Blue Line capacity should be based on the credible evidence of resident experience and not the MBTA’s self-serving determination that no capacity issues exist during commuter rush hour times.

**Suffolk Downs Development Proposal**  
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The Additional Information Document of September and its supporting materials do not have sufficient information to make an informed evaluation of the project transportation measures, adverse impacts and proportional mitigation measures.

The information provided indicates that the project remains excessively dependent on private vehicles via a reduced width “superstreet” concept for Route 1A corridor, to the detriment of public transit options and other alternative low impact modes.

The Document indicates that review and recommendations are being formulated through a Transportation Working Group, meeting every other week.

**3.c Action Required** -> All Transportation Working Group meetings should be public, with posted notice, agenda and meeting minutes and materials.

Transportation measures listed in Exhibit J include numerous elements under review or subject to future analysis.

**3.d Action Required** -> All Exhibit J transportation measures must be complete, comprehensive and specified as enforceable provisions of any final Planned Development Agreement, including enforceable commitment to achieve a Mode Share of 50% non-private single occupancy vehicles.

**Public Transit – Blue Line: Analysis of Current and With-Project Conditions**

Increased public transit demand on the Blue Line is a reasonably foreseeable adverse impact of the project.

We believe the project will result in significant reductions of already unsatisfactory levels of service at Beachmont and Suffolk Downs Blue Line Stations during peak commute hours weekday mornings and evenings.

Level of Service should be measured in length of delay, wait times and number of people waiting on the platforms at those stations.

The original plans showed a large increase in ridership -something on the order of a doubling - at both of Beachmont and Suffolk Downs Blue Line stations. The effect of this increase was to absorb any excess capacity left on that line during peak periods.

In absorbing remaining Blue Line capacity upstream, the project will cause compounding delays at downstream stations.

The loss of service which will be experienced in existing communities during the peak morning and afternoon crush periods has not been carefully examined.

And the impacts of this issue are likely to be considerable -both in causing congestion at downstream urban transit stations, such as wait times to get onto trains at Orient Heights, Wood Island, Airport, and Maverick Stations rising from a train or two into the order of 30+ minutes.

**Suffolk Downs Development Proposal**  
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This sort of congestion could induce avoidance behaviors which could add traffic congestion.

The inbound pressures on the morning commute will be repeated in the opposite direction during the outbound commute -causing congestion and delays - overcrowding platform, such as lines to get into State Street and Government Center Stations.

**3.e Action Required** -> Determine and confirm the baseline condition for existing Levels of Service for Blue Line at all stations in East Boston.

**3.f Action Required** -> Calculate Level of Service for Blue Line East Boston at each successive phase of project build-out and at the target 50% Mode Share and any greater or lesser Mode Share projected.

**3.g Action Required** -> Identify measures required to achieve reasonable Levels of Service for Blue Line East Boston at each successive phase of project build-out and at the target 50% Mode Share.

“Reasonable” to be defined as peak morning and evening commute wait times of not more than 5 minutes.

**3.h Action Required** -> The final set of proposed project mitigation measures for the PDA must include all proposed agreements between the proponent and the MBTA and MassDOT, including specifically :

- Measures to increase peak hour capacity on the Blue Line
- Measures to improve Beachmont and Suffolk Downs Stations

**3.i Action Required** -> The Master Transportation Access Plan Agreement must be prepared in draft form and released for public comment at the same time as the next round of other project materials are released.

- - -



**Suffolk Downs Development Proposal**  
**FoAW Coalition– Detail Comments October 15, 2019**

**3.0 Suffolk Downs: Transportation cont.**

WBZ News Boston : May 14, 2019

BOSTON (CBS) – If you hate sitting in traffic, imagine trying to get a patient to a Boston hospital during rush hour.

EMT's took WBZ-TV for a ride in an emergency response vehicle through East Boston and the Sumner Tunnel during the morning rush hour recently. It's a route they might take from many North Shore towns to the city's major hospitals, and it's routinely plagued with gridlock.

"Traffic is obviously a challenge to get that patient to where they're going," said Armstrong Ambulance EMT Sean Mangan.

"There are no breakdown lanes here," said EMT Melissa Pierce.

On that particular day, 41,329 vehicles took the same trip through the tunnel.

"There's no direction for anybody. It's kind of a free-for-all," said Pierce, referring to the confusing Sumner approach. Without lights and sirens, a one-and-a-half-mile stretch of the trip took 45 minutes.

"Everyone thinks it's just a mess," said Joe Sinatra, a bartender at Santarpio's Pizza, situated near the tunnel's entrance. "They're going to have to come up with something, because it's just going to keep getting worse and worse."

The neighborhood veered into a dark world of gridlock when the toll booths came down a few years ago, leaving constant construction around a confusing knot of merging lanes.

Add to that, an ever-growing number of vehicles. Transportation experts say it's due to booming development in Boston, expansion at Logan Airport, and an increase in ride-share trips.

WBZ learned transportation authorities did not see all of that traffic coming. A MassDOT report shows officials predicted that, over five years, the daily number of trips through the tunnel would jump 2.5 percent. Instead it zoomed up more than 46 percent.

"People can't move," said Boston's former transportation commissioner John Vitagliano, who also used to be the city's tunnel supervisor. "It's gotten to the point where it's been designated an official public safety hazard."

He says he predicted it would happen, and urged lawmakers to do something about it decades ago. "Much of what we're seeing today could have been avoided if the state had the foresight to invest in public transportation over the decades."

<https://boston.cbslocal.com/2019/05/14/boston-traffic-so-bad-it-has-become-a-public-safety-hazard/>

**Suffolk Downs Development Proposal**  
**FoAW Coalition– Detail Comments October 15, 2019**

**4.0 CLIMATE, RESILIENCY & NATURAL SYSTEMS**

The Suffolk Downs site is within the City’s highest risk zone for sea level rise due to climate change. East Boston neighborhood as a whole is among City neighborhoods most at risk from sea level rise.

Additionally, Belle Isle Marsh, one of the state’s most significant coastal natural areas, will be entirely submerged seal level rise associated with by climate change under current 25-50 year projections.

As a result, site-specific and district scale resiliency measures are priority issues for East Boston residents.

As detailed in this section, significant unresolved questions exist with respect to project resiliency measures.

A flood risk baseline based on 100-year storm as applied in the project analysis is obsolete.

**4.a Action Required** -> The proponent must evaluate flood risk using the City’s benchmark planning horizon of 2070, with a 1% chance storm event and 40 inches of sea level rise. (City of Boston Sea Level Rise – Flood Hazard Area mapping).

**4.b Action Required** -> The 2100 planning horizon should also be used, reflecting the project life time at full build-out.

To aid decision-makers and the public, project documents must set out the climate analysis clearly, in accurate terms readily understandable by non-experts.

Key variables are projected sea level rise in future years, storm (precipitation) event frequency and intensity, coincidence of high tide and the menu of feasible resiliency measures to reduce or eliminate risk.

Subsequent project materials should evaluate climate change resiliency measures as follows:

1. Use 2070 and 2100 as the planning horizon years
2. Show by map flood risk for baseline and post-project for site and district

Exhibit A.1 consists of a site map from project’s Draft Project Impact Report and the same site from City of Boston projected flood risk at year 2070 and 1% event.

The Impact Report map shows FEMA current risk areas and a revised 100-year risk area based on proponent modeling: a before and after mapping. (*DPIR, VII at 8.7.1*)

The City map is the year 2070 and 1% event planning baseline flood risk: the future condition “before” resiliency measures.

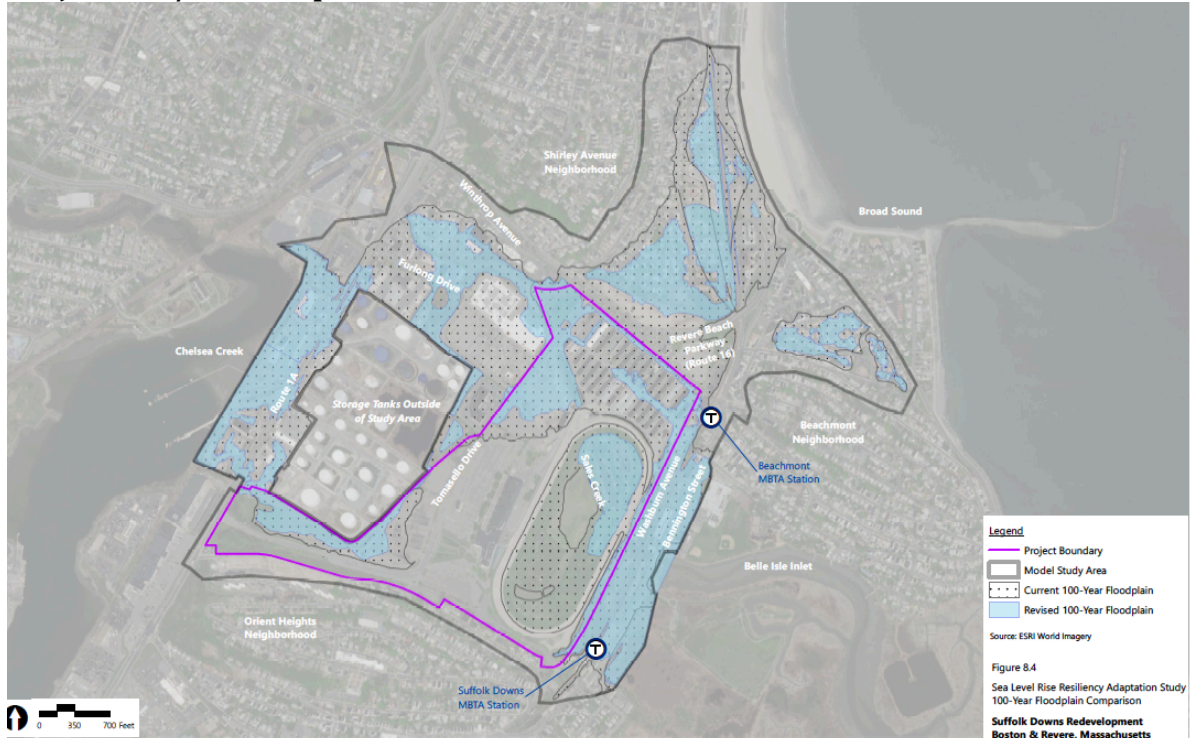
Subsequent analysis should overlay on the 2070 1% risk map flood risk “after” climate resiliency measures. Additionally, the analysis should generate a before and after risk map for 2100 planning yea

# Suffolk Downs Development Proposal

## 4.0 Suffolk Downs: Climate Change & Natural Resources

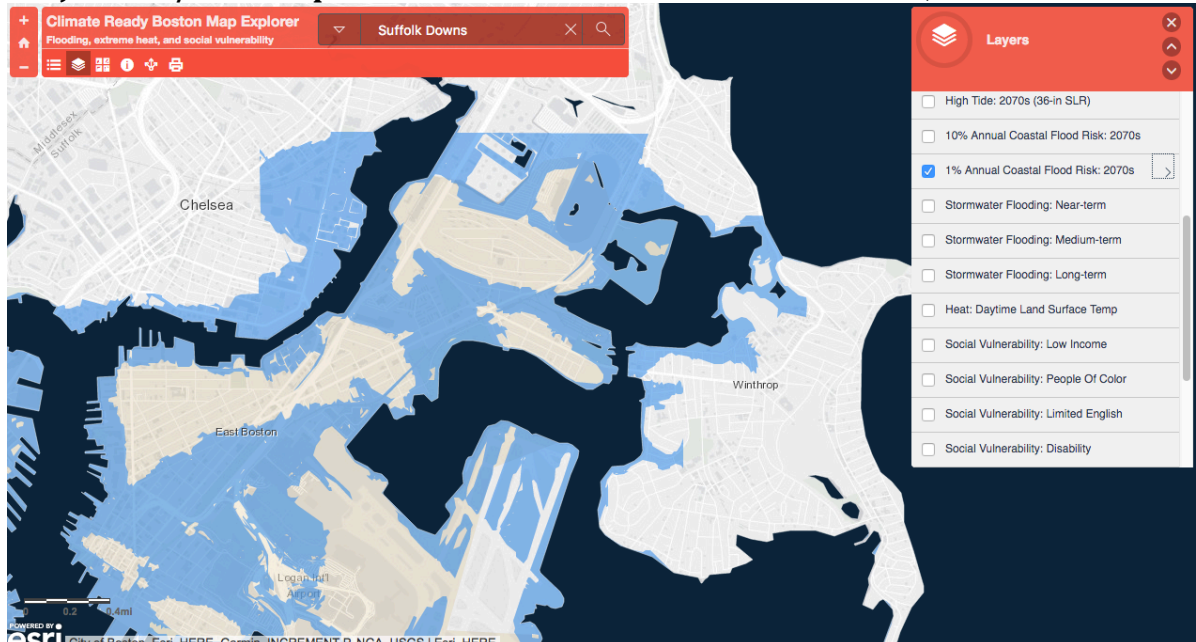
### Exhibit A.1 Flood Risk Mapping Examples

#### Project Site/Area Map with Current FEMA Risk and Revised 100 Year Flood Plain



Draft Project Impact Report: Figure 8.4

#### Project Site/Area Map with Flood Risk + Sea Level Rise @ 2070, 1% Event



Climate Ready Boston Map Explorer

**Suffolk Downs Development Proposal**  
**FoAW Coalition– Detail Comments May 30, 2019**

**4.2 Suffolk Downs: Climate Change and Sea Level Rise: Future of Belle Isle Marsh**

Belle Isle Marsh consists of approximately 240-acres and is part of the larger Rumney Marsh Area of Critical Environmental Concern. Belle Isle and the connected Sales Creek at Suffolk Downs are components of an interconnected marsh, estuary and coastal watershed ecosystem largely eliminated by development in Boston and urban Massachusetts.

Project documents state that Belle Isle may disappear and become open water by 2030 or thereafter, depending on the rate of projected Sea Level Rise applied. (“*Sea Level Rise Impacts to Belle Isle Marsh*”, Suffolk Downs Development, Draft Project Impact Report, V. II; Sec. 8.7.4.3).

As salt marshes experience sea level rise, migration inland provides an established approach to retain their natural resource benefits. See for example: “*Modeling the Effects of Sea Level Rise on Massachusetts Coastal Wetlands: Improving Protection, Management, and Climate Change Adaptation Planning*”, Woods Hole Group, Inc., Massachusetts Office of Coastal Zone Management; November 2016.

Suffolk Downs site is within the City’s highest risk zone for sea level rise due to climate change: an estimated 19.5 ft sea level rise - base flood elevation.

For millennia, the site was saltwater marsh and open water much like Belle Isle. Despite fill in the early 20<sup>th</sup> century, significant natural resources remain on site, most prominently the Sales Creek Area of Critical Environmental Concern, together with wetlands and mature trees.

Project documents list elements intended to address sea level rise, including use of compacted fill to raise the site, extensive site engineering by retention basins, garages with underground water storage capacity and a system of pumps and tidal gates.

A berm or barrier parallel to Bennington St. is proposed as a medium-to-long term measure to address regional flood risk. This flood barrier would protect the project site as well as nearby off-project properties. The proponent states that costs of the regional barrier would be largely borne by public agencies.

The Additional Information Document of September 16, 2019 indicates that the proponent has committed to providing \$2.625M to upgrade the Bennington Street Pump Station.

This approach is a further investment in engineered systems, rather than feasible solutions with natural systems included as an essential component.

Our analysis suggests that a Bennington Street berm would effectively prevent future inland migration for Belle Isle Marsh. Project documents do not evaluate impacts on Belle Isle Marsh from the proposed regional berm or barrier along Bennington St.

Loss of Belle Isle Marsh by sea level rise and prevention of inland migration due to a regional berm represents a significant adverse impact.

**Suffolk Downs Development Proposal**  
**FoAW Coalition- Detail Comments October 15, 2019**

Suffolk Downs building program and engineered stormwater and flood risk systems should not impair current and future health of Belle Isle Marsh.

Alternative project site configuration and project area strategies can provide mitigation of this adverse impact.

**4.c Action Required** -> The project materials must evaluate alternatives to provide for migration of Belle Isle Marsh while improving Suffolk Downs and regional flood protection.

**4.d Action Required** -> If the recommended building program and associated systems may harm the Marsh, this harm should be acknowledged in project documents and understood as a consequence of project approval.

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**Suffolk Downs Development Proposal  
FoAW Coalition – Detail Comments October 15, 2019**

**4.2 Suffolk Downs: Climate Change and Sea Level Rise**

**Exhibit A.2  
Salt Marsh and Estuary Resource Values**

In Massachusetts, salt marsh and estuary ecosystems can be found at bay and ocean shores in the intertidal zone, that is, any area that regularly inundated by the tide.

Salt marshes are located in the intertidal zone. The term estuary is a broad one used to describe an area where fresh water meets the sea. As freshwater flows into a marine environment, it carries with it nutrients from terrestrial run-off.

Salt marshes are among the most biologically productive ecosystems on earth and play an important role in filtering out nutrients. Salt marshes serve as critical habitat for a host of important animals species including fishes, shellfish, and birds.

Estuaries are almost always associated with high biological productivity making them important ecological and economic systems. For many marine fishes and invertebrates estuaries serve as habitat in which they can find shelter, breed, and forage. Estuaries have tremendous recreational value as they offer an ideal setting for fishing, kayaking, and photography.

Source: National Park Service, National Seashore, Massachusetts  
<https://www.nps.gov/caco/learn/nature/estuaries-and-salt-marshes.htm>



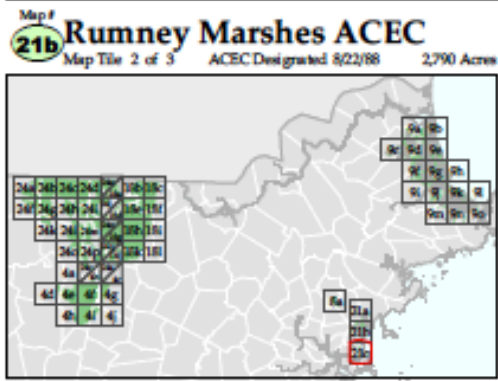
Belle Isle Marsh. Photo by Danielle Walquist Lynch

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Suffolk Downs Development Proposal  
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4.2 Suffolk Downs: Climate Change and Sea Level Rise

Exhibit A.3  
Salt Marsh and Estuary Resource Values



Massachusetts Department of Conservation and Recreation  
Areas of Critical Environmental Concern (ACEC) Program  
This map is intended to be used with the written boundary description contained in the ACEC designation document. The mapped boundary is not to be used by itself for definitive ACEC boundary delineation or regulatory interpretation. For review of site-specific projects within the ACEC boundary, determinations may need to be made in the field or in consultation with ACEC Program Staff.  
For more information:  
[www.mass.gov/dcr/statewide/acec](http://www.mass.gov/dcr/statewide/acec)

- ACEC Boundaries by Type
- Road/Rail based
  - River based
  - Wetland based
  - Floodplain based
  - Tide based
  - Contour based
  - Political boundary
  - Property line based
  - Other
  - Digital update required
- Areas not within an ACEC are shaded with a gray mask.
- dcrcr  
Massachusetts  
0.25  
miles  
N

<https://www.mass.gov/service-details/rumney-marshes-acec>



**Suffolk Downs Development Proposal  
FoAW Coalition – Detail Comments October 15, 2019**

**4.2 Suffolk Downs: Climate Change and Sea Level Rise**

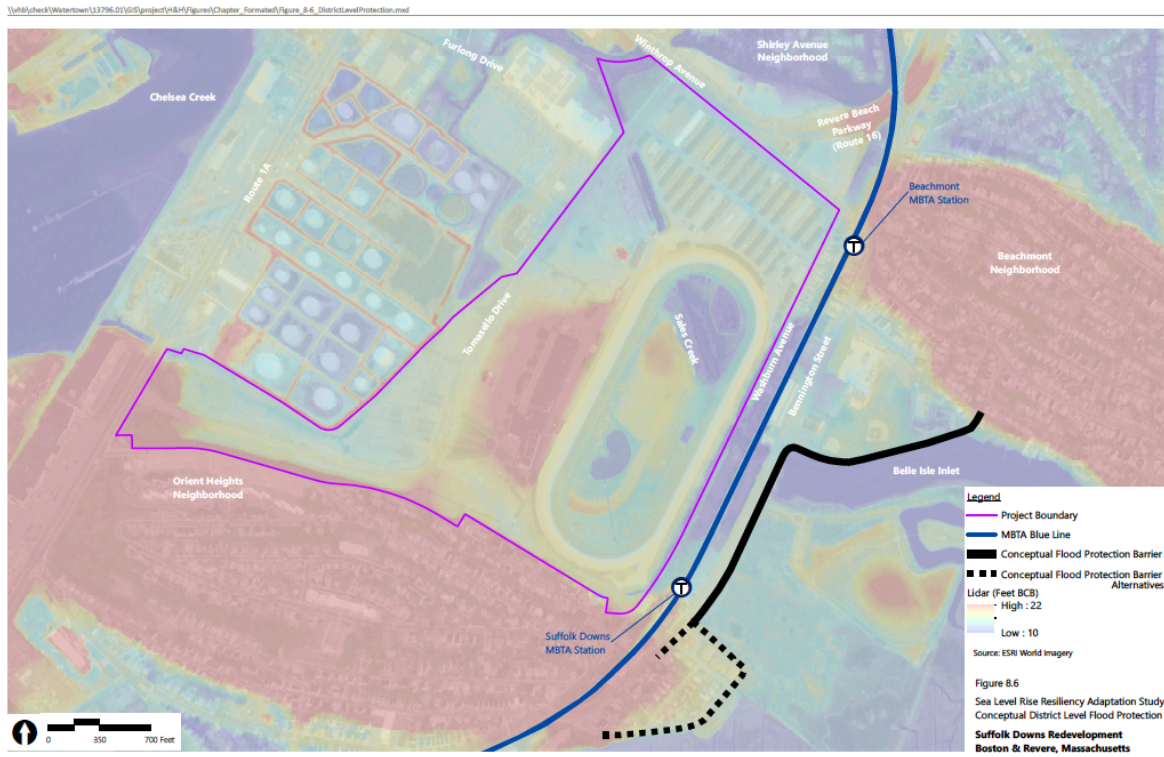
**Exhibit B  
Flood Protection Barrier Option**

Proponent rendering of Belle Isle Marsh, Sales Creek estuary outlet at Bennington St, MBTA Blue Line and conceptual flood protection barrier (solid black line).

The flood protection barrier would effectively eliminate any future inland migration space for the salt water – freshwater marsh confluence of Belle Isle Marsh.

With projected sea level rise, a flood protection barrier at this location combined with no inland migration route would mean Belle Marsh complete submersion within 25-50 years.

Loss of Belle Isle Marsh would be a substantial adverse impact.



source: Suffolk Downs Redevelopment, Draft Project Impact Report, Oct. 1, 2018  
Figure 8.6

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**Suffolk Downs Development Proposal  
FoAW Coalition – Detail Comments October 15, 2019**

**4.2 Suffolk Downs: Climate Change and Sea Level Rise**

**Exhibit C  
Salt Marsh Migration Option**

BPDA rendering of Belle Isle Marsh, Sales Creek estuary outlet at Bennington St, MBTA Blue Line and conceptual open space and building configuration at Suffolk Downs.

BPDA concept shows substantial open space buffer area between the Blue Line parallel to Bennington St. and the first row of buildings at Suffolk Downs.

This open space buffer would provide meaningful future inland migration space for the salt water – freshwater marsh confluence.



source: BPDA Climate Ready Boston: Resilient Boston Harbor

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**Suffolk Downs Development Proposal**  
**FoAW Coalition – Detail Comments October 15, 2019**

**4.3 Suffolk Downs: Impacts at Belle Isle Marsh**

Belle Isle Marsh consists of approximately 240-acres and is part of the larger Rumney Marsh Area of Critical Environmental Concern. Belle Isle and the connected Sales Creek are parts of a connected ecosystem that has been elsewhere largely eliminated by development.

(Over 80% salt marshes have been eliminated in Boston since 1770. Bromberg, Keryn D., and Mark D. Bertness. "Reconstructing New England Salt Marsh Losses Using Historical Maps." *Estuaries* 28, no. 6 (2005): 823-32. )

Massachusetts Surface Water Quality Standards (314 CMR 4.00) lists Sales Creek as an Outstanding Resource Water (ORW). These waters are designated as an excellent habitat for fish, other aquatic life and wildlife and have high aesthetic value.

Sales Creek and Belle Isle Marsh are classified as critical resource areas requiring high level of stormwater treatment to maintain water quality

1. Analysis of stormwater flows from the project site via Sales Creek into Belle Isle Marsh is insufficient and cannot support a finding of net public benefit.

The project proposes treating stormwater on site, and, in addition to groundwater infiltration, proposes redirecting some unquantified volume of stormwater away from Sales Creek and Belle Isle Marsh and into Chelsea Creek.

Project documents state that the proposed redirection of water flow will not harm the estuary freshwater and saltwater confluence or alter the existing ecological profile of the marsh or stream. However these statements are based on general conclusions not supported by technical analysis.

**4.e Action Required** -> Sales Creek flow diversions require adequate analysis, due to the critical ecological significance of Sales Creek and Belle Isle Marsh.

**4.f Action Required** -> Understanding of baseline and projected with-project conditions of the estuary system is needed, with flow volume, timing and water quality, salinity and other key variables accurately assessed.

**4.g Action Required** -> Impact to Belle Isle natural resources and public serving facilities from possible significant increase in visitor use must be evaluated.

The project will result in many thousands of new residents and work-day visitors to Suffolk Downs. Project documents fail to assess and mitigate the foreseeable adverse impacts from this significant additional uses on Marsh natural resources, including dogs off-leash, and on public facilities such as trails, benches and viewing areas.

Built infrastructure at Belle Isle is at 30 year mark and definitely needs upgrading in light of the significant population which may be visiting Belle Isle from the project site.

**Suffolk Downs Development Proposal**  
**FoAW Coalition – Detail Comments October 15, 2019**

**4.4 Suffolk Downs: Natural Resources at the Project Site**

Analysis of on-site natural resources and description of proposed project impacts remains incomplete and does not support a finding of net public benefit.

Documents do not include historical and contextual information about the project site and its role within area natural systems. The documents summarily describe current site natural systems as significantly disturbed and degraded; the documents do not adequately describe the substantial resource value of existing on-site natural systems. The documents do not consider how on-site natural systems are part of a regional ecology that includes Belle Isle Marsh.

**4.h Action Required** -> Substantial analysis of on-site natural systems, of project impacts and on-site and off-site mitigation measures is required before a net project benefit finding can be made. The analysis must include:

1. A comprehensive site inventory of existing trees must be completed via site visit with Boston Parks Recreation Department.
2. The PDA must include a tree protection, tree planting and tree maintenance plan; this plan must include all feasible modifications of building and infrastructure site plans in order to retain the maximum number of mature trees; immediate clear-cut of the site and gradual tree replacement is a clear risk under the current plan.
3. A site and regional watershed documentation of natural resources, indicating historical conditions (pre fill of Suffolk Downs) current site and regional baseline and project improvements with detail by phase; 100 ft. non-build buffer areas must be used for on-site delineated resource areas.
4. The PDA must include a Project Phase 1 element of total site interim uses, a public process for proposed use review and approvals, and a total site care and maintenance program which fully protects existing on site resources and which includes agreed resource enhancement measures.
5. The Phase I program must include on-site urban tree nursery of at least 1 acre to be established and maintained in a future phase public open space area.
6. A wildlife assessment of the site, including discussion of wildlife corridors and bird flyways between the site and Belle Isle Marsh; and management plan for Belle Isle as there will be a surge of wildlife from Suffolk Downs into Belle Isle Reservation.
7. Lighting and bird strike deterrence needs to be factored into all buildings, as a major local species habitat and migratory flyway exists at Belle Isle
8. Final document set for the project sent for final review to the public and City Departments must include clear, complete and accurate details of current on site natural resources and the natural resource protection and improvement plan, by project phase.

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**Suffolk Downs Development Proposal**  
**FoAW Coalition – Detail Comments October 15, 2019**

**5.0 Project Review Steps to Resolve Significant Open Issues and Help Ensure  
Maximum Public Participation in Decision-making**

Significant issues remain unresolved for the Suffolk Downs proposed development.

Project documents are not sufficient for BPDA to certify the Project Impact Report as complete and do not support a finding of net public benefit for a Planned Development Area agreement as required by Article 80.

Unresolved issues be addressed in an amended Draft Project Impact Report and revised draft PDA agreement.

Additionally, all supporting project agreements – such as those governing transportation, housing and community benefits – should be released in substantially complete form together with the revised Draft Impact Report and PDA.

While a phased Master Plan may defer some project decisions to future stages of development, providing flexibility in response to market changes, new technology and other factors, a basic framework and key process elements should be memorialized in written, enforceable agreements presented at the time of initial project consideration.

Written agreements should include provision for enforcement by public parties, including public benefit organizations and residents.

All project documents – collectively the proposed “Comprehensive Project Agreements” – should be circulated for a final 30-day comment period. The project staff report should be circulated in draft form for review and comment.

Subsequent document modifications if any should be made before a Final Impact Report may be certified and the final proposed Planned Development Area document, all supporting agreements and the staff report are advanced to the BPDA Board.

There should be a minimum 30-day Board meeting notice period, during which all project documents are posted for public review.

To maximize public participation, BPDA Board should meet in East Boston in an evening session where consideration of Suffolk Downs is the sole agenda item.

Residents should be allowed to speak at this BPDA Board meeting.

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**FINAL NOTE:** FoAW Coalition position is that site housing should be 70% locally affordable, 30% market rate, union labor for construction and operation and local job creation benefitting from site proximity to airport and downtown Boston, with site and regional climate resilience achieved by greater reliance on natural systems.

This approach would involve a fundamentally different social housing and cooperative development model, likely requiring market value buy out of current ownership.

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**Suffolk Downs: Possible Future Development 10/15/2019**  
**Affordable Housing in \$, Units and % Units with Assumptions**  
**IDP + Linkage + Stabilization Fund + State Transportation Share**

**Table 1**

Assume Total Boston-side Units = 7,310  
 Based on Gross Residential Sq Ft = 7,310,000  
 Avg Residential Sq Ft = 1,000

**Affordable Housing in Units**

**Affordable Housing as % of Total Units**

**SOURCE 1: IDP ->**

IDP Units Based on 13% of Tot Boston Side Units = 950

**SOURCE 1: IDP ->**

% of Affordable Units via IDP = 13.0%

**SOURCE 2: Development Impact Project: Linkage**

\$ per Non-Residential Sq Ft \$9.03  
 Based on Non-Residential Sq Ft less 100k = 3,110,000  
 Fund excl any time value \$ discount or admin = \$28,083,300.00

**Development Impact Project as % of Tot Boston-side Units ->**

**Development Impact Project in Units ->**

\$/unit & Fund \$	\$28,083,300	\$28,083,300	\$28,083,300
\$100,000	281	281	281
\$250,000	112	112	112
\$500,000	56	56	56

\$/unit & Fund \$	\$28,083,300	\$28,083,300	\$28,083,300
\$100,000	3.8%	3.8%	3.8%
\$250,000	1.5%	1.5%	1.5%
\$500,000	0.8%	0.8%	0.8%

**SOURCE 3: East Boston Housing Stabilization Fund ->**

\$/unit & Fund \$	\$5,000,000	\$10,000,000	\$25,000,000
\$100,000	50	100	250
\$250,000	20	40	100
\$500,000	10	20	50

**Stabilization Fund Contribution as % of Tot Boston-side Units ->**

\$/unit & Fund \$	\$5,000,000	\$10,000,000	\$25,000,000
\$100,000	0.7%	1.4%	3.4%
\$250,000	0.3%	0.5%	1.4%
\$500,000	0.1%	0.3%	0.7%

**SOURCE 4: Transportation Offset From State at ->**

\$/unit & Fund \$	\$0	\$25,000,000	\$50,000,000
\$100,000	0	250	500
\$250,000	0	100	200
\$500,000	0	50	100

**Transportation Offset as % of Total Boston-side Units ->**

\$/unit & Fund \$	\$0	\$25,000,000	\$50,000,000
\$100,000	0.00%	3.42%	6.84%
\$250,000	0.00%	1.37%	2.74%
\$500,000	0.00%	0.68%	1.37%

**TOTAL ALL SOURCES: Affordable Housing in Units**

\$/unit & Fund \$	Low	Med	High
\$100,000	331	631	1,031
\$250,000	132	252	412
\$500,000	66	126	206

**TOTAL ALL SOURCES: Affordable Housing in % of Total Units**

\$/unit & Fund \$	Low	Med	High
\$100,000	17.5%	21.6%	27.1%
\$250,000	14.8%	16.5%	18.6%
\$500,000	13.9%	14.7%	15.8%



# HARBORKEEPERS

October 15, 2019

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: Master Plan for Planned Development Area (PDA) Suffolk Downs Development Project

Dear Mr. Czerwienski,

We have not had sufficient time to review all aspects of the Suffolk Downs Development Project to submit thorough comments that can be placed on record on behalf of The Harborkeepers. There are many aspects of this large-scale, complex and phased-out development project that require careful distillation of all project documents, analysis of short-term and long-term impacts to the community, the built environment, the coastal environment, implications of transportation and housing infrastructure development and how this project will impact the overall equitable development of East Boston as a whole. As an organization working diligently on climate and coastal resiliency issues, we would like the opportunity to meet with HYM Investment leadership and their respective consultants to truly understand the climate resiliency aspects of this project. Until we have had the opportunity to do so, we will not be able to submit comments that reflect our thorough understanding and conviction as to whether this project will indeed find a balance between the addition of built environment infrastructure to the East Boston landscape vs. the climate resiliency elements that could potentially offset projected climate impacts on the site as well as abutting parcels.

Hence, I am submitting a request to extend the comment letter deadline one additional month until November 15, 2019. Thank you very much for your consideration of the comment deadline extension.

Respectfully yours,

Magdalena Ayed  
Executive Director

Cc: Mayor Martin J. Walsh, Senator Joe Boncore, Representative Adrian Madaro, District City Councilor Lydia Edwards, At-Large City Councilor Michelle Wu, At-Large City Councilor Annissa Essaibi-George, At-Large City Councilor Michael Flaherty, At-Large City Councilor Althea Garrison, Lina Tramelli, East Boston Neighborhood Liaison



*Friends of Belle Isle Marsh*  
*PO Box 575 East Boston, MA 02128*

October 15, 2019

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*Vice President*

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*Director*

*Joanne McKenna*  
*Director*

*Gail Miller*  
*Director*

*Mary Mitchell*  
*Director*

*Ann Marie Murray*  
*Director*

*Elizabeth Regan*  
*Director*

*Suzanne Ryan*  
*Director*

*Karyl Stoia*  
*Director*

*Kannan Thiruvengadam*  
*Director*

Director Brian Golden  
Boston Planning & Development Agency

Dear Director Golden:

With regard to the development proposed at Suffolk Downs in East Boston:

As it currently stands, we are unable to support the development plan. The plan does not address direct project impacts both on the Suffolk Downs site and area natural resources, or identify ways to protect **Belle Isle Marsh, the largest salt marsh in the City of Boston**, which will be severely impacted by the development caught between rising seas and rising buildings (stopping its ability to migrate). The marsh provides the following benefits:

- Storm buffer for residents of surrounding neighborhoods, including the future residents of Suffolk Downs
- A critical waypoint for migrating birds, where they feed and breed; The lack of such a waypoint is a death sentence for them
- A habitat for hundreds of species of amphibians, insects, and wading birds. The Eastern Saltmarsh sparrow was already officially in vulnerable state per [a 2016 Mass Audubon article: \*The saltmarsh sparrow dangerously close to extinction\*](#)
- Climate change mitigation via [large scale carbon sequestration](#)

Development is the most essential and opportune time for planning to protect the marsh -- the main abutter put under threat by the development (and other ongoing factors). It is unrealistic to assume that there are other entities responsible for protecting the marsh. **Now is the time to create a plan to protect the marsh.** Please do not proceed with the development process before engaging the developer, the city, and the state to devise a plan to protect the marsh.

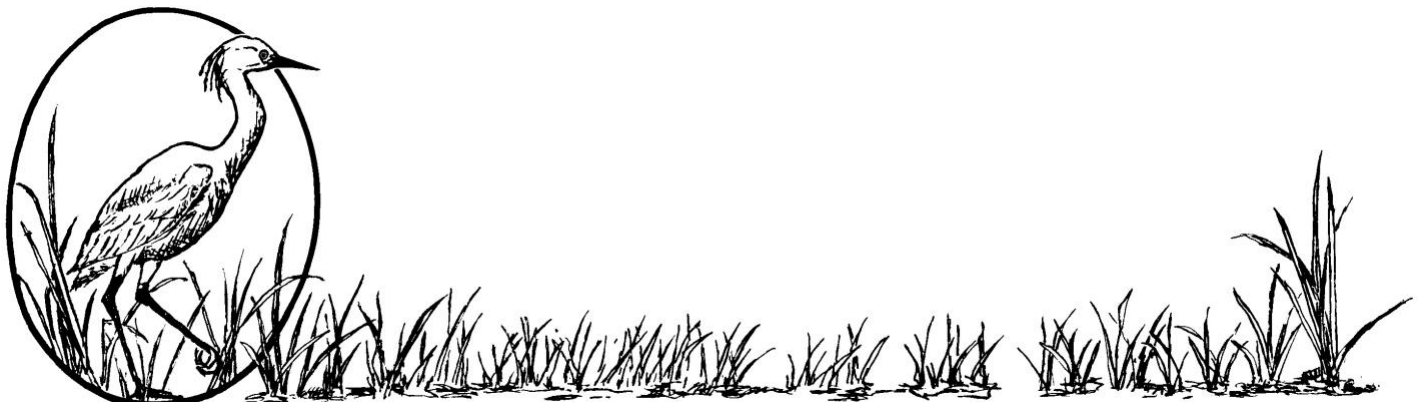
Without the complete evaluation of project impacts on Belle Isle Marsh and meaningful mitigation measures, the project cannot support a finding of net public benefit, as required by Article 80.

We also fully support Friends of Allandale Coalition, Greater Boston Legal Services, City Life Vida Urbana, Living Streets Alliance, and Greenroots in their comments, including the 90-day minimum comment period extension request.

Pictures: 1. The vulnerable salt-marsh sparrow 2. McKay Students learning about marsh life 3. Hispanic families on Easter Sunday in the marsh



Sincerely  
*Mary Mitchell*,  
President, Friends of Belle Isle Marsh



Director Brian Golden & Project Manager Tim Czerwienski  
Boston Planning & Development Agency  
One City Hall, Ninth Floor  
Boston, Massachusetts 02201

October 16, 2019

Dear Messrs. Golden and Czerwienski,

Thank you for the opportunity to comment on The McClellan Highway Development Company's Suffolk Downs Modified Planned Development Area (PDA) Proposal. I support the development of an inclusive, transit oriented, mixed-use project and ask you to consider the following comments related to the proposal.

**October 7 Translation** | The modifications to the PDA were not translated to Spanish until October 7, 2019. The comment period should be extended, at a minimum, to November 7, 2019 for community review and input.

**Zoning and Design** | The Federal Aviation Administration building height restrictions set the stage for a similar feel to the Seaport. Incremental five foot setbacks on 200-foot-tall buildings will not mitigate the blockiness that the zoning in the PDA would allow. Density is important for a successful project, but not at the expense of designing a livable, walkable neighborhood. Greater setbacks or more various building heights should be included in the PDA to limit cavernousness.

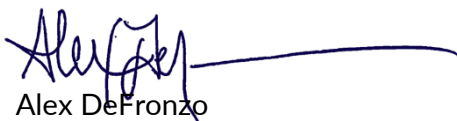
**Affordable Housing/Economic Diversity** | The developer should commit to 20% inclusionary units on-site at an average of 70% Area Median Income (AMI) with at least 500 units at 30% AMI and 500 at 50% AMI.

**Net Zero** | Allowing an oil-wealthy Texas billionaire to further enrich himself by turning a wetland into a carbon emitting development that exacerbates the effects of climate change is as bad as it sounds. No matter who is financing the project, it is 2019. Knowing what we know, it would be immoral to allow a project of this scale to advance without being carbon neutral.

**Community Fund** | The proponent should commit to the creation of a perpetual community benefit fund. In the DEIR/DPIR Summary of Mitigation/Draft Section 61 Findings, 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 and written into the PDA, not negotiated on a building-by-building basis.

Thank you for considering these comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Alex DeFronzo", with a long horizontal line extending to the right.

Alex DeFronzo  
Impact Advisory Group





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

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## Sandra Nijjar Suffolk Downs Statement

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**Sandra Nijjar**

To: tim.czerwienski@boston.gov

Wed, Oct 16, 2019 at 2:48 PM

My name is Sandra Lorena Aleman-Nijjar, director and founder of the East Boston Community Soup Kitchen. I along with an amazing team of neighbors started this initiative in order to do something to help out the disadvantaged in our community of East Boston. Every Tuesday we open our doors and serve breakfast, lunch and dinner to all who enter, and try to connect guests to needed services. However, I along with an incredible team of volunteers want to do more for our less fortunate.

Each and every one of our soup kitchen guests—just like you and me—has a story of how they wended up in their position. Seriously, nobody wants to be homeless. Every Tuesday, and oftentimes during the week as well, we hear their stories, and do what we can to contribute to their wellbeing.

As a community, it is our collective responsibility to care for the marginalized among us. At the soup kitchen, we've been doing our best. HYM, as our new neighbors that you will be, we ask that you do your part as well. We appreciate your help so far, but as the Suffolk Downs project is likely to increase the cost of living in Eastie, which will increase housing instability and risk of homelessness, we believe it is your duty to do your best to mitigate these negative impacts. So, we come to you with the following 3 demands:

Set aside 2%-5% of your budget for a shelter to provide services for the homeless and addicted in East Boston. East Boston currently lacks the type of resources that other areas of the city have, and we care about our neighbors and believe all deserve to stay in the neighborhood.

Provide a building for East Boston Community Soup Kitchen to better serve our guests, near public transit so that our folks have access to transit and don't feel the stigma of being tucked away in some unknown corner of Eastie or out of Eastie.

Increase the percentage of affordable housing in the Suffolk Downs development to 33%, according to a 70% of East Boston's median income (NOT the regional AMI used by the city). This way, less people will be forced to the brink of homelessness.

We are a strong community here in East Boston, and we will not allow outsiders come to take advantage of us. Furthermore, this is not just HYM's duty, but also all development companies who wish to turn a profit off of us. Our community, and yes, our homeless folks too, are worth more than a bonus at the end of the year for implementing a development plan. Thank you for your time!

Sincerely,  
Sandra Nijjar



October 16, 2019

**Via Email and First-Class Mail**

Tim Czerwienski, Project Manager  
Boston Planning and Development Agency  
One City Hall Square  
Boston, MA 02201  
[tim.czerwienski@boston.gov](mailto:tim.czerwienski@boston.gov)

**Re: Suffolk Downs**

Dear Mr. Czerwienski,

On behalf of a coalition of Boston-based community groups organized by and for residents of color, including GreenRoots, City Life/Vida Urbana, Neighbors United for a Better East Boston, MassCOSH, the Center for Cooperative Development and Solidarity, and Stand for Democracy (hereinafter, “the Community Groups”), Lawyers for Civil Rights respectfully submits this comment to express the Community Groups’ significant concerns regarding the Supplemental Information submitted on September 16, 2019 by the HYM Investment Group (hereinafter, “HYM”). In light of these concerns, the Community Groups strongly oppose the redevelopment of Suffolk Downs in its present form.

As a threshold matter, the Community Groups note that a month was insufficient time for this comment period. Given the immense importance of this project, the extensive documentation submitted by HYM, and the translation issues noted below, a much longer comment period was warranted. The Community Groups respectfully request that the comment period be extended 120 days to allow time for additional interested residents, stakeholders, and advocacy organizations to submit comments addressing questions and shortcomings with HYM’s proposal.

**Overarching Flaws in The Development Review Process**

Before addressing the substantive problems with the Supplemental Information, the Community Groups highlight several overarching flaws in the Development Review Process, which cumulatively serve to shut out from the review process many of those who will be most directly affected. Taken together, these concerns demonstrate how low-income residents, immigrant residents, and residents of color are being systematically excluded from the largest development project in Boston history—a development that will primarily impact and displace those very residents.

**I. Lack of Translation**

HYM failed to translate the Supplemental Information into Spanish, continuing a longstanding problem in the development process. By failing to translate the Supplemental Information, HYM displaced the burden of translation onto residents and community groups such as those represented in this comment letter, which are already operating with limited

financial and human resources. The failure to translate the document—even though HYM is well aware that many residents of East Boston are monolingual Spanish speakers or English language learners and has translated prior submissions—raises serious legal and equity concerns. Similarly, the Community Groups note that the oral Spanish translation provided at community meetings has been problematic and unprofessional. HYM translators appear unfamiliar with the technical jargon used in planning documents and so simply repeat these terms in English, to the confusion of the audience. On at least one occasion, HYM utterly failed to provide a translator, leaving a City of Boston employee who happened to speak Spanish to step in.

This deliberate indifference to the demographics and needs of the East Boston community may subject HYM (and the Boston Planning Development Agency (BPDA)) to liability under state and federal anti-discrimination laws, including Title VI. Title VI, the accompanying regulations and state law prohibit discrimination based on national origin. *See* 42 U.S.C.A. § 2000d; *see also* 28 C.F.R. § 42.405(d)(1) (“Where a significant number or proportion of the population eligible to be served or likely to be directly affected by a federally assisted program (e.g., affected by relocation) needs service or information in a language other than English in order effectively to be informed of or to participate in the program, the recipient shall take reasonable steps, considering the scope of the program and the size and concentration of such population, to provide information in appropriate languages to such persons.”). In comparable instances, the lack of translation into languages spoken by affected communities has drawn legal scrutiny. *See, e.g., Nat’l. Multi Housing Council v. Jackson*, 539 F.Supp. 2d 425, 430 (D.D.C. 2008) (observing DOJ has “consistently adhered to the view that the significant discriminatory effects that the failure to provide language assistance has on the basis of national origin, places the treatment of LEP individuals comfortably within the ambit of Title VI and agencies’ implementing regulations.” (citation omitted)).

This project cannot and must not move forward without professional translation of every public document and community presentation.

## **II. References to External Documents and Discussions**

As other commenters have noted, HYM’s BPDA submissions have attempted to incorporate by reference external discussions, plans, and memoranda without actually including them in the Planned Development Area (PDA) or other binding documents. Residents cannot meaningfully assess the impact of, or comment on, decisions they are excluded from reviewing. In its current form, even with the Supplemental Information, the PDA is incomplete.

Accordingly, the Community Groups request that HYM both provide the following documents and incorporate them in their entirety into the PDA:

- A detailed description of the “regional solutions” to climate change HYM is seeking with the Commonwealth and the Cities of Boston and Revere;
- An itemized breakdown of the proposed contribution to transit upgrades that is currently “under discussion” with the MBTA;

- A detailed description of the “significant linkage funds” HYM claims will flow to the Neighborhood Housing Trust, so that the community can assess their impact and adequacy;
- Any agreements, including drafts, with MBTA and/or MassDOT; and
- Any Project Labor Agreements pertaining to the construction and staffing of Suffolk Downs, such that the Community Groups can assess whether the project’s workforce will include local residents, women, and people of color, as well as women-owned and minority-owned small businesses.

### **III. Lack of Representation on the Impact Advisory Group (IAG)**

Suffolk Downs cannot be separated from the context in which this development is taking place. Since 2013, 19 large residential projects have been approved by the BPDA, injecting approximately \$700 million in condominiums and apartments into a historic immigrant enclave.<sup>1</sup> Yet tellingly, no representative from any of the Community Groups was invited to sit on the project’s IAG, despite their years of activism and advocacy in East Boston. It is shortsighted to include primarily “abutters” of the project on the IAG, as if the only stakeholders are those adjacent to the former racing site. Suffolk Downs is regional in scope and impact; it involves the wholesale construction of a new mixed-used neighborhood, with 10.5 million square feet of development across two cities. The project will fundamentally change the character, cost, and composition of every neighborhood it touches and all surrounding communities. Without including organizations led by and serving people of color on the IAG, the BPDA will have an incomplete picture of the social and environmental impacts of Suffolk Downs.

#### Housing and Affordability

### **IV. Amount and Rental Pricing of Affordable Housing**

In the Supplemental Information, HYM states that 13% of the total square footage of all dwelling units in Boston will be set aside as affordable units, in order to facilitate the provision of two- and three-bedroom units suitable for families. On-site rental units will be provided at an average of 70% of Area Median Income (“AMI”).

The Community Groups request additional information on how the decision to keep a set percentage of the total residential square footage affordable, rather than a set percentage of the total units, impacts the number and size of affordable units. Given the housing shortage in Greater Boston, the lower median household income of East Boston, and the need for multi-bedroom units, the Community Groups strongly believe that half of the residential units built by HYM should be provided at 30% AMI, an amount that reflects the actual earnings of East Boston residents. Additionally, half of these residences should be two and three-bedroom units.

Although the Community Groups recognize that their proposal exceeds the City of Boston’s mandatory set-aside of 13% of available residential space for affordable housing, this allocation

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<sup>1</sup> Conti, K., *East Boston Health Center Tries to Adapt to a Gentrifying Neighborhood*, The Boston Globe (Jul. 17, 2016).

is amply justified. Vacancy rates are at historical lows, putting ever greater pressure on low-income renters. In a 2019 Housing Report Card, the Boston Foundation observed that while a 6% vacancy rate is generally considered stable for rental properties, the vacancy rate in Greater Boston “dipped well below 4% in 2015 and has yet to recover.”<sup>2</sup> This low vacancy rate disincentivizes landlords from listing rentals at affordable prices, while increasing the risk of displacement, as “vulnerable renters” are unable to compete for an ever-decreasing number of apartments with higher-income households.<sup>3</sup> The Boston Foundation specifically noted that a “disproportionate percentage of the region’s renters are low-income and people of color who have historically been pushed or priced out of the housing market.”<sup>4</sup> A similar report by the Federal Reserve Bank of Boston estimated that Massachusetts must nearly double its stock of affordable apartments in order to support extremely low-income households, which would require the construction of over 4,000 affordable apartments per year.<sup>5</sup> Indeed, in the Supplemental Information, HYM itself acknowledges the “ongoing displacement pressures in and around East Boston,” which are driving long-term residents out of their homes.

The Community Groups’ proposal that half of the affordable units be two- and three-bedroom apartments recognizes the need for larger-sized units for those who will be most impacted by the Suffolk Downs project. Immigrants make up over half of East Boston’s population.<sup>6</sup> Immigrant-headed households in Massachusetts are, on average, larger than native-born households, which is due in considerable part to the larger number of children in immigrant families.<sup>7</sup> If BPDA were to endorse HYM’s proposal, it would be effectively guaranteeing that East Boston immigrant families and families of color will be shut out of Suffolk Downs, even though the project spans a historically working-class immigrant community. In so doing, the BPDA would be perpetuating the housing segregation that has characterized displacement and gentrification in Boston for generations. This worrisome trend of building white neighborhoods has been extensively documented by the Boston Globe’s Spotlight series in connection with the development of the Seaport.<sup>8</sup>

Community Groups believe their affordable housing proposal is also justified in light of the anemic nature of HYM’s proposed financial contributions to public transportation. These contributions are significantly out-of-step with other large-scale developments in Greater Boston that are dwarfed by the size and scope of Suffolk Downs. By contrast, HYM and NB Development Group paid for and constructed an entirely new regional rail station serving the multi-phase, mixed-use 15.2 acre Boston Landing Development that directly links downtown

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<sup>2</sup> The Boston Foundation, The MHP Center for Housing Data, & The University of Massachusetts Donahue Institute (UMDI). (2019, June). *The Greater Boston Housing Report Card 2019 Supply, Demand and the Challenge of Local Control. The Greater Boston Housing Report Card 2019 Supply, Demand and the Challenge of Local Control.*

<sup>3</sup> *Id.*

<sup>4</sup> *Id.*

<sup>5</sup> Federal Reserve Bank of Boston. (Apr. 3, 2019). *The Growing Shortage of Affordable Housing for the Extremely Low Income in Massachusetts.* Retrieved from <https://www.bostonfed.org/publications/new-england-public-policy-center-policy-report/2019/growing-shortage-affordable-housing-extremely-low-income-massachusetts.aspx>

<sup>6</sup> Boston Planning & Development Agency Research Division, *East Boston* (May 2017).

<sup>7</sup> The Immigrant Learning Center, Inc., Clayton-Matthews, A., & Watanabe, P. (2012, March). *Massachusetts Immigrants by the Numbers, Second Edition: Demographic Characteristics and Economic Footprint.*

<sup>8</sup> Ryan, A., et al., *A Brand New Boston, Even Whiter Than The Old*, Boston Globe (Dec. 11, 2017) (noting that Boston “had a rare opportunity to build a new neighborhood for all Bostonians. Instead it built the Seaport.”)

Boston and Brighton.<sup>9</sup> In Somerville, Federal Realty Investment Trust invested \$15 million to build Assembly Station on the Orange Line for the primary purpose of serving Assembly Square, a retail and residential development.<sup>10</sup> As part of a community benefit package, Encore Boston Harbor invested over \$70 million in roadway improvements in Everett and Sullivan Square and transportation alternatives, including shuttle buses and water taxis, with plans to potentially extend the Silver Line from Chelsea to Encore in Everett.<sup>11</sup>

Given the low level of HYM’s public transportation investment for Suffolk Downs, the Community Groups propose that the BPDA require HYM to commit funds equivalent to what a development of this size would typically invest in public transportation, and dedicate them to affordable housing instead. Such a contribution would amply support Community Group’s proposal that half of the residential units built by HYM should be provided at 30% AMI and that half of these should be two and three-bedroom units

## **V. Stabilization Fund**

As per the Supplemental Information, HYM has agreed to provide \$5 million to a housing stabilization fund that will be used to assist East Boston-based nonprofits in purchasing existing market-rate housing units to lease or sell them at affordable rates. The Community Groups believe this sum is utterly insufficient to address displacement pressures in East Boston. When considering the scale of this project and its attendant footprint in this region, \$5 million is a paltry sum. Indeed, HYM’s own project liaison has estimated that each housing unit costs the developer about \$500,000. To dedicate the approximate cost of ten rental units to housing stabilization, given the scale of Suffolk Downs, is insulting and inadequate. Instead, the Community Groups propose HYM’s contribution to the stabilization fund should represent a meaningful percentage of the cost of the overall project, to be determined by the BPDA in consultation with the community, including the undersigned groups.

## Climate Resilience

### **VI. Compliance with Climate Action Plan**

Suffolk Downs must meet all construction standards outlined in the City of Boston’s 2019 Climate Action Plan, including, but not limited to ensuring the entire development is zero net carbon or energy positive and submitting a Carbon-Neutral Building Assessment. Given the urgency of the climate change crisis, the enormous and unprecedented footprint of Suffolk Downs, and the lengthy anticipated construction period, there is no justification for noncompliance. Resiliency is particularly needed in East Boston and Revere, which are uniquely vulnerable to sea level rise propelled by climate change. Indeed, the Climate Action Plan estimates that by the end of the 21st century, “between 10 and 20% of East Boston will face flooding at high tide, even when there is no storm.” HYM has not meaningfully explained or

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<sup>9</sup> Sperance, C., *Developers Seen As Key Ingredient in Several Multibillion-Dollar Transit Plans*, Bisnow (Jul. 30, 2019).

<sup>10</sup> Moskowitz, E., *MBTA Board OK’s Millions for Station Improvements*, The Boston Globe (Oct. 5, 2011).

<sup>11</sup> LaFratta, K. & Solis, S., *As Encore Boston Harbor Prepares to Open, Traffic Nightmares Could Present New Transit Opportunities*, MassLive (Jun. 21, 2019).



justified its failure to comply with the City’s own standards. The Community Groups urge the BPDA to hold Suffolk Downs to the standard Boston has set for its future.

Additional Mitigation

**VII. Diversity and Training for Private Security**

It is anticipated that HYM will hire private security officers during the pendency of construction and across the vast Suffolk Downs worksite. Given the demographics of East Boston, this workforce must be drawn from the community they serve, include a percentage of people of color that reflects East Boston’s neighborhoods, and be largely bilingual in English and Spanish. Additionally, prior to any breaking of ground, all private security officers must undergo extensive implicit bias training to reduce the influence of racial bias in community interactions and officer decision-making.

**VIII. Use of Commercial and Rental Space**

In its present form, Suffolk Downs will include two retail squares at Suffolk Downs and Beachmont Stations and a public plaza with over 100,000 square feet of ground floor retail. In order to preserve the character of these neighborhoods, it is essential that locally-owned, women-owned and minority-owned businesses be afforded access to this commercial and retail space. Gentrification has not simply displaced individuals and families—local businesses and nonprofits, which anchor whole communities, have been forced to relocate from long-held homes. Accordingly, the Community Groups request information on what steps, if any, HYM is taking to prioritize the inclusion of locally-owned, women-owned and minority-owned small businesses and nonprofits in Suffolk Downs’ commercial spaces to ensure residents are able to share in the wealth generated by this project. This is particularly urgent in light of the ongoing crisis surrounding women- and minority-owned small businesses in Boston, who received “less than 1% of the \$664 million Boston awarded last year for contracts for constructions and professional goods and services.”<sup>12</sup>

**IX. Mitigation for Vulnerable Residents**

As community activists and advocates, the Community Groups have firsthand familiarity with the vibrancy and diversity of East Boston. However, with the marked rise in gentrification, the Community Groups also see the challenges experienced by many East Boston residents, including opioid addiction, chronic homelessness, and significant underemployment. These residents and their lived experiences are entirely missing from the PDA and Supplemental Information, even though they are an integral part of East Boston. The Community Groups request information as to what mitigation, financial or otherwise, HYM is intending to make to benefit East Boston’s most vulnerable residents, including support services and workforce development. This mitigation will be especially salient if, as the Community Groups predict, the project accelerates the rate of displacement in East Boston, leaving families financially destabilized and without adequate housing to meet their needs.

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<sup>12</sup> Valencia, M., *Boston Awarded \$664m In Contracts. Less Than 1% Went To Women- And Minority-Owned Businesses*, Boston Globe (May 2, 2019).

Conclusion

In summary, for the reasons expressed herein, the Community Groups strongly oppose the redevelopment of Suffolk Downs in its present form. A project of this magnitude, in a lower-income, historically immigrant community suffering from rising rents, must incorporate a far fuller set of benefits for the communities of color harmed and displaced by the proposed redevelopment.

Sincerely,



Lauren Sampson, Esq.  
Lawyers for Civil Rights

cc: John Walkey, GreenRoots  
Lisa Owens, City Life/Vida Urbana  
Andres Del Castillo, City Life/Vida Urbana  
Gloribell Mota, Neighbors United for a Better East Boston  
Jodi Sugerman-Brozan, MassCOSH  
Luz Zambrano, Center for Cooperative Development and Solidarity  
Blake Shetler, Stand for Democracy  
Boston City Councilor Lydia Edwards



October 16th, 2019  
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

**RE: Master Plan for Planned Development Area (DPA)  
Suffolk Downs Development Project**

Dear Director Golden:

It is with grave concern that we submit the following comments regarding the proposed development at Suffolk Downs. These arise in response to supplemental information released by the developer (HYM), as well as attendance of several public meetings. Stand for Democracy is a voluntary network of faith-based organizing, dedicated to training and uplifting immigrant faith communities in East Boston.

As people of faith of the Christian variety, we follow the Jesus who continually uplifted the poor and the marginalized. It's no accident that in the liturgy for this Sunday, the Gospel text is Luke 18:1-8, where Jesus tells a parable about a widow—a particularly vulnerable class of people in those times—who consistently badgered an unjust judge until he gave in and granted her justice after being taken advantage of. We are that very widow, badgering our politicians both elected and instated, until they become so weary as to bring justice to an unjust situation.

Firstly, we appreciate your efforts to translate previous documents into Spanish. Nearly all of our constituents speak only Spanish, and need adequate Spanish-language accommodations in order to adequately process and respond to official processes. However, the most recent updates to the PDA were not released in Spanish as well, preventing the majority of our communities from being able to respond and offer feedback. Our first request is that you provide adequate Spanish-language translation of the updated PDA, as well as an extension to the public comment period of 120 days after the Spanish language document is released.

Further, we request adequate and knowledgeable translation services at future public meetings. At the most recent public meeting on October 1<sup>st</sup>, the writer of this letter had to personally translate for one of Stand for Democracy's constituents who arrived late. The writer of this letter is not a certified translator nor well-versed in the specific terminology of this project, so our constituent was not able to fully comprehend what was going on. Going about a public process without Spanish language services prevents a large population of East Boston's current residents from engaging with the process, and must be remedied in the future.

Aside from language access issues, the people of East Boston need to have a more direct say in this process. For example, the members of the Advisory Impact Group, do not adequately reflect the population that will be affected by this development—in terms of the economic makeup of the neighborhood, in terms of race/ethnicity, as well as in terms of country of origin.

We still don't know what the impacts of this project will be in terms of displacement due to cost of living increases. Obviously, the development is not evicting anyone, but it will undoubtedly raise property

values, which will result in raised rents, leading to displacement. We request that an impact study be done so that we may know what type of changes will be occurring.

Together with City Life/Vida Urbana, NUBE, MASSCOSH, GreenRoots, Cosecha, and Zumix, we are calling for 50% of onsite housing units (units, not square footage) be affordable according 50% of East Boston's median income (not the AMI). Of that, 50% should be between 2-4 to preserve the working class, family-oriented nature of East Boston. Further, we are calling for adequate Spanish-language accommodations, and a 120 extension of the public comment period after the release of updated documents in Spanish. We also support the comments of Lawyers for Civil Rights.

We also uplift the voice of the East Boston Community Soup Kitchen (EBCSK) and their request for more services for those struggling with addiction and homelessness. Just as Jesus cared for the marginalized and oppressed, so it is also our duty to care for our homeless community members. EBCSK does its best with its limited resources, but if developers such as HYM want to be our new neighbors, than they need to follow the lead of EBCSK and invest in treatment services. The proposed housing stabilization fund is a step in the right direction, however, a shelter is what's needed in East Boston. Right now, our homeless community members are facing dropping temperatures and gearing up for the winter, when they freeze on the streets rather than stay in the overcrowded and dangerous shelters downtown. We need to provide immediate support services to them, and any company or governmental agency wanting to profit from the housing market in East Boston must contribute to providing a shelter to support our homeless folks.

As people of faith, we also believe it to be important to provide communal spaces for spiritual renewal in the Suffolk Downs project. This could include, but not be limited to, a church, synagogue, or mosque; but more importantly something like the space shared in Maverick Square between NUBE (which focuses on creating abundant community and leadership development), the Ayni Institute (which uplifts and teaches organizing and spiritually based on Latin American indigenous groups), and Cosecha (which organized for permanent protection for immigrants). These spaces are vital for any community's wellbeing—everyone needs a space for connection in community and spiritual growth. Whatever the specifics are, it needs to be decided upon by a group that adequately reflects East Boston's current residents, and not be geared towards the new residents which will likely be disproportionately whiter and wealthier than the current residents.

Sincerely,  
Blake Shetler on behalf of  
Stand for Democracy

GREATER BOSTON  
LEGAL SERVICES  
*...and justice for all*

October 25, 2019

*Via Email*

Brian Golden  
Director  
Boston Planning and Development Agency  
City Hall Plaza  
Boston, MA 02108

E. Renee LeFevre  
General Counsel  
Boston Planning and Development Agency  
City Hall Plaza  
Boston, MA 02108

Tim Czerwienski  
Project Manager  
Boston Planning and Development Agency  
City Hall Plaza  
Boston, MA 02108

Re: Continued Fair Housing concerns regarding revisions to Suffolk Downs Project

Dear Mr. Golden, Ms. LeFevre, and Mr. Czerwienski:

We are writing in response to the Boston Planning and Development Agency's (BPDA) request for public comment on the revised proposal of The McClellan Highway Development Company, an affiliate of HYM Investment Group LLC (hereinafter the "Proponent") to redevelop the Suffolk Downs site at 525 McClellan Highway (hereinafter the "Project" or "Project Site"). As you recall, our public comment on the initial proposal emphasized our grave concerns regarding the fair housing implications of the Proponent's initial Planned Development Area (PDA) filing, mainly because it proposed to add thousands of high-end apartments to East Boston while making minimal commitment to building affordable housing or housing suitable for families with children, which is plainly inadequate for a community in the midst of an unprecedented displacement crisis. Although the revised PDA does take steps in the right direction—in particular, we support the proposed establishment and funding of an East Boston

Housing Stabilization Fund over and above the Proponent’s Inclusionary Development Program (IDP) and Linkage commitments—it does not significantly address the concerns we raised in our previous letter regarding the adverse impact the Project will likely have upon protected classes in East Boston. We urge the BPDA not to approve the Project unless the Proponent makes a broader and deeper commitment to affordable housing production at the Project Site, including a range of unit sizes suitable for members of protected classes at all income levels, and also shows a clear willingness to be held accountable for its affordability and fair housing commitments over the course of building the Project. In addition, BPDA must honor basic principles of non-discrimination and language access by extending the comment period, and refraining from moving forward with a vote on the Project, until thirty days after Spanish-speaking residents have had a full and fair opportunity review materials in their native language. Because of the significant flaws in the Proponent’s proposed revised PDA, and in BPDA’s review process, BPDA cannot approve the revised PDA as written without running afoul of its obligation, and that of the City of Boston, to affirmatively further fair housing.

**I. In order to comply with its obligation to affirmatively further fair housing, BPDA and the City must insist upon a far broader commitment to affordable housing development (as well as deeper affordability) than what is promised in the revised PDA filing.**

The federal Fair Housing Act, Title VIII of the Civil Rights Act of 1968, 42 U.S.C. § 3601, *et seq.*, requires that “programs and activities relating to housing and urban development” be administered “in a manner *affirmatively to further* the purposes of” the Fair Housing Act.<sup>1</sup> Numerous acts of Congress require grantees of federal housing and community development funds to certify that they will affirmatively further fair housing.<sup>2</sup> As the agency engaged in planning and zoning approvals for the City of Boston, BPDA is also charged with the duty to affirmatively further fair housing. That duty not only prohibits discrimination in housing-related activities and transactions, but requires “*meaningful actions* to be taken to overcome the legacy of segregation, unequal treatment, and historic lack of access to opportunity in housing.”<sup>3</sup> This duty is a “*mandate* to take the type of actions that *undo historic patterns of segregation and other types of discrimination* and *afford access to opportunity that has long been denied.*”<sup>4</sup> The revised PDA under review does not meet this mandate.

As we explained in our previous comment, to permit the Proponent to build over 7,000 new rental units in East Boston—which represents nearly half of the *existing* housing stock in the

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<sup>1</sup> 42 U.S.C. § 3608(d) (emphasis added)

<sup>2</sup> *See, e.g.*, Sections 104(b)(2) and 106(d)(7)(B) of the Housing and Community Development Act, 42 U.S.C. §§ 5304(b)(2), 5306(d)(97)(B); Section 105(b)(15) of the Cranston-Gonzalez National Affordable Housing Act, 42 U.S.C. § 12705(b)(15).

<sup>3</sup> U.S. Dept. of Housing & Urban Development, Affirmatively Furthering Fair Housing Final Rule, Federal Register, Vol. 80, No. 136, July 16, 2015, pgs 42272-42371, at 42272 (emphasis added).

<sup>4</sup> *Id.*, at 42274 (emphasis added).

neighborhood<sup>5</sup>—without requiring a *substantial investment* to ensure that a meaningful proportion of new housing is affordable to current residents of the neighborhood would be wildly inconsistent with the City’s obligation to affirmatively further fair housing under federal law. In our view, enforcing only minimum compliance with existing IDP requirements falls woefully short, in the context of a project of this size, scope, and magnitude, of what is required in order for the City to fulfill its fair housing duties. BPDA is empowered by the City’s zoning enabling statute<sup>6</sup> to insist on measures to mitigate the adverse impact of new real estate development in the City above and beyond IDP and Linkage requirements, but has failed to do so in this case in a manner consistent with its obligations under the Fair Housing Act.

The revised proposal, like the original, stubbornly clings to the bare minimum threshold of 13 percent on-site affordability without any deeper affordability (except as offset by allowing the Proponent to exceed the City’s 70% of area median income IDP guidelines, so the average affordability level is no deeper than 70% of area median income). Although this would allow the creation of some units at levels below 70% of area median income, there is no net increase in affordability, despite the sweeping consequences this development will have on rents and displacement in the surrounding area. Moreover, in response to broad and overwhelming feedback that the Proponent’s proposal to prioritize the construction of studios and one bedroom units would be incompatible with the community’s need for more housing suitable for families with children, the BPDA responded not by insisting that the Proponent build more family-friendly apartments at all income levels, but rather by suggesting that it build family housing as part of its IDP mandate and measure its IDP obligation as a percentage of residential square footage, rather than residential units—a “solution” which will likely result in fewer on-site affordable units than under its original proposal.<sup>7</sup> Rather than revising the Project so as to pit families with children against smaller working-class households and single individuals (including the elderly and disabled) in need of affordable housing, the BPDA should condition the unprecedented zoning relief at issue here upon the Proponent’s willingness to ensure that this Project benefits East Boston families across a range of household sizes and incomes reflected in the community, including households with children, elders, and the disabled, all of whom are

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<sup>5</sup> See Boston Planning & Development Agency, *Boston In Context: Neighborhoods, 2013-2017 American Community Survey*, at 7 (January 2019) (noting that East Boston currently contains 16,826 occupied units of housing).

<sup>6</sup> Chapter 665 of the Acts of 1956, as amended, Section 21.

<sup>7</sup> See Suffolk Downs Redevelopment, Additional Information Document, filed Sept. 16, 2019, available at <http://www.bostonplans.org/getattachment/2cecb88b-c9f4-4ed2-9007-7ff3847094e9>, at 7–9.

protected classes under federal and/or state law and are disproportionately likely to be unable to afford market-rate housing.<sup>8</sup>

As we have outlined previously, East Boston is a majority-Latinx<sup>9</sup> and working-class neighborhood, where the median household income is between 40 and 50 percent AMI,<sup>10</sup> and an overwhelming number of households are already rent-burdened. The Proponent must recognize that without setting aside a higher proportion of units to be affordable to households at or below *this threshold*, the Project is likely to exacerbate displacement in the neighborhood.<sup>11</sup> And BPDA must recognize that increased displacement in East Boston is certain to harm protected classes, including and especially the Latinx community and families with children, disproportionately.<sup>12</sup> Consequently, consistent with its obligation to affirmatively further fair housing, the City must refuse to grant the Proponent the wide and unprecedented zoning relief it requests until the Proponent makes a commitment to provide more housing that is affordable to households with incomes at or below what is typical in *East Boston* and thereby reduce the risk that the Project will dramatically worsen the displacement crisis in the development area.<sup>13</sup> While tools exist in the PDA filing as constituted that may assist the Proponent in achieving this goal—such as the Proponent establishing and funding an East Boston housing stabilization program to support affordable housing projects in the neighborhood—these initiatives must be both targeted specifically toward the production of housing on or in the immediate vicinity of the Project Site and funded at a high enough level to ensure that any housing produced is deeply subsidized.<sup>14</sup> In particular, the City must insist that the Proponent dedicate far more money to the new stabilization fund than the \$5 million it has currently committed—which, if the new fund is

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<sup>8</sup> See generally Stone, Michael, Ph.D., Boston Median Incomes 2012, City, By Race and Tenure (unpublished research); Annie E. Casey Foundation, Kids Count Data Center, Children in Poverty by Race and Ethnicity in the United States (2017), available at <https://datacenter.kidscount.org/data/tables/7678-children-living-in-households-with-a-high-housing-cost-burden-by-race?loc=1&loc=2#detailed/2/2-52/true/573,869,36,868,867/10,11,9,12,1,185,13/14832,14833>; McArdle, Nancy, Percent of Renter Households with Incomes At or Above Boston Metro Median: 2015 (unpublished research based upon data from the Census Bureau's 2015 American Community Survey, 5 year estimates, Public Use Microdata Sample. HUD, 2015 Income Limits for Boston-Cambridge-Quincy, MA-NH Metro FMR Area).

<sup>9</sup> See *Boston in Context*, *supra* Note 5, at 9.

<sup>10</sup> *Id.* at 25–26.

<sup>11</sup> See “Upzoning Chicago: Impacts of a Zoning Reform on Property Values and Housing Construction,” March 29, 2019, <https://urbanaffairsreview.com/2019/03/29/upzoning-chicago-impacts-of-a-zoning-reform-on-property-values-and-housing-construction/>.

<sup>12</sup> Annie E. Casey Foundation, Kids Count Data Center, Children Living in Households with a High Housing Cost Burden by Race in the United States (2017), available at <https://datacenter.kidscount.org/data/tables/7678-children-living-in-households-with-a-high-housing-cost-burden-by-race?loc=1&loc=2#detailed/2/2-52/true/573,869,36,868,867/10,11,9,12,1,185,13/14832,14833>.

<sup>13</sup> See, e.g., *Opinion of the Justices*, 234 Mass. 597. 610-11 (1920) (property owner who experiences a lessening of land value due to a permissible restriction imposed upon its use “must be held to be compensated by the general benefit to the community of which he is a member.”)

<sup>14</sup> See Additional Information Document, *supra* note 3, at 8.

deployed in the same way as existing IDP money, would likely subsidize no more than 76 new units of additional affordable housing in East Boston, or around 1 percent of units projected at the project site.<sup>15</sup> Additionally, given the severe logistical challenges that will inevitably be associated with building offsite affordable units—including and especially the likelihood that nonprofit entities will struggle to find readily developable land and acquire existing housing in competition with private developers around the Project Site, which is located in a rapidly gentrifying area of the City where property values continue to skyrocket—the City should require the Proponent to provide such mitigation payments and other measures as are necessary to “buy down” broader and deeper affordability on the Project Site itself. Given the huge financial windfall the Proponent is likely to obtain as a result of this unprecedented re-zoning process, and the profound impact it will have on low- and moderate-income residents of East Boston, these concessions are minor, and highly justified in light of the need to minimize the accelerant effect the Project will have in the development area and surroundings.<sup>16</sup>

**II. The revised PDA’s “non-discrimination covenant”—which, like its predecessor, is under-inclusive, imposes no affirmative obligations upon Proponent and its successors-in-interest, and fails to provide for phase-by-phase monitoring—is woefully inadequate.**

As a separate, but related, matter, there is a gaping absence of ongoing monitoring and other accountability mechanisms in the PDA filing, which are critical to ensuring that the Proponent is required to implement practices that will affirmatively further fair housing over the life of the Project. In our prior letter, we noted that the “Non-Discrimination Covenant” (designed to be incorporated as a deed restriction for the Project Site so that no present or future owner engages in unlawful discrimination) was unacceptably weak in several important ways, including by protecting a narrower set of protected classes than exist under state and federal law and neglecting to impose any affirmative obligations (such as marketing to

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<sup>15</sup> See Boston Planning & Development Agency, *Bridging the Gap: Creating Income Restricted Housing Through Inclusionary Development, 2018 Annual Report*, at 7, available at <http://www.bostonplans.org/getattachment/fb05806a-d218-4a3b-bdef-e1221d7159d3> (stating that \$137.1 million in IDP funding has supported the construction of 1,414 finished income-restricted units as well as an additional 669 that are permitted or under construction; proportionally, this means that \$5 million in new funding would support 76 income-restricted units).

<sup>16</sup> See generally Tanvi Misra, *New York City Has Been Zoned to Segregate*, CITYLAB, January 25, 2017, available at <https://www.citylab.com/equity/2017/01/new-york-city-has-been-zoned-to-segregate/514142/>; Leo Goldberg, *Game of Zones: Neighborhood Rezoning and Uneven Urban Growth in Bloomberg’s New York City* at 26, fig. 3, available at <https://dspace.mit.edu/handle/1721.1/98935> (analyzing effect of different forms of rezonings upon property values in New York City and finding that “upzoning” caused huge spikes in assessed property values for multifamily and mixed-used buildings relative to other forms of rezoning); see also Seidman, Karl F. and ConsultEcon, Inc., DRAFT LINKAGE NEXUS STUDY FINAL REPORT TO BOSTON PLANNING AND DEVELOPMENT AGENCY 3 (December 2016) (demand for affordable housing created by non-residential development far out-strips existing linkage exactions).



protected classes). Because the Covenant was only minimally edited under the revision,<sup>17</sup> this Covenant, as we expressed in our prior letter, is “not strong enough to be meaningful” and must be rejected by BPDA. As part of its duty to affirmatively further fair housing, BPDA must develop required, standard, state-of-the-art fair housing language for covenants and other documents to ensure that projects it approves will affirmatively further fair housing into the future, and to ensure permanent affordability of units created to meet BPDA’s and the Proponent’s fair housing obligations. Because responsible land use policy necessarily requires “[i]nsisting that landowners internalize the negative externalities of their conduct,” like mass displacement, failure to implement rigorous fair housing requirements as part of the review process for the Project would be malpractice on BPDA’s part.<sup>18</sup>

In addition, the Proponent has yet to accept *any* form of phase-by-phase community review in either its original or revised PDA filing, which represents the primary mechanism to hold it accountable for its affordability commitments (as well as other promised community benefits and mitigation measures) over the life of the Project. As presently envisioned, the Project is to be constructed in five phases across a period that may span two decades, and it is critical that East Boston residents have input into the construction process between those phases, so that certain components (including and especially the Proponent’s affordable housing commitments) may be evaluated and even revised in accordance with the facts on the ground and community need. In order to meet its duty to affirmatively further fair housing, BPDA must insist upon the addition of language in the final PDA filing that would force the Proponent to submit to community review prior to the commencement of Phase 2 and each subsequent stage of the Project.

### **III. BPDA must further extend the comment period in order to provide Spanish-speaking residents of East Boston an equal opportunity to review and provide input into the Project.**

Finally, we note that the deadline for this latest round of comments, October 31, falls only twenty-four days after the draft PDA was published in Spanish, three weeks following a bilingual

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<sup>17</sup> See Planned Development Area (Revised), filed Sept. 16, 2019, *available at* <http://www.bostonplans.org/getattachment/b32c090d-63a2-454e-8e70-9f10bce6fd97>, at 15–16. Specifically, subsection A, but not subpart D, was edited to include all classes protected under state and federal law. No other revisions to the Covenant were made, meaning that it still fails to specify that it will also apply to any other protected class that may become enshrined by future amendments to state and federal anti-discrimination law, and still fails to require the Proponent or its successors in interest to affirmatively further fair housing by taking steps to actively market residential units to members of protected classes, among other shortcomings.

<sup>18</sup> *Koontz v. St. Johns River Water Management Dist.*, 570 U.S. 595, 605 (2013) (citing *Village of Euclid v. Ambler Realty Co.*, 272 U.S. 365 (1926)); *see also, e.g., Kaplan v. City of Boston*, 330 Mass. 381, 384 (1953) (stating that “[t]he primary purpose of zoning is the preservation in the public interest of certain neighborhoods against uses which are believed to be deleterious to such neighborhoods”); *Manning v. Boston Redevelopment Authority*, 400 Mass. 444, 452 (1987) (holding that power to designate a PDA, like the zoning power in general, necessarily requires officials to consider if “special treatment” of property owner warranted based upon “whether the public welfare will be served thereby”).

public hearing regarding the revisions to the PDA filing, and *six* days following the publication of the translated “Additional Information Document” explaining many of the key changes to the PDA on a variety of subject areas in plain language.<sup>19</sup> As a federal grantee—specifically (via the City of Boston) of the federal department of Housing and Urban Development (HUD)—BPDA is required, under Title VI of the Civil Rights Act of 1964, to provide meaningful access to frequently-encountered Limited English Proficiency (LEP) communities to its review process by providing prompt translations of vital documents into the native languages of those communities, as well as an equal opportunity to participate in the comment process as English-speaking residents.<sup>20</sup> It is well-established that if a HUD grantee fails to provide adequate language access to LEP communities—especially to those as prevalent as East Boston’s sizeable community of native Spanish speakers—under these circumstances, this failure can constitute national origin discrimination, in violation of federal civil rights law.<sup>21</sup> Moreover, providing language access to non-native English speakers affected by rezoning projects as substantial as this one—and in particular, ensuring that Spanish speakers have an equal chance to comment on the revised proposal as their English-speaking neighbors—is unquestionably part of BPDA’s duty to affirmatively further fair housing. Thus, at minimum, the comment period should be extended until at least thirty days from today’s date, since BPDA and/or the Proponent waited until today to publish the revised “Additional Information Document” in Spanish. BPDA’s vote on the revised proposal must likewise be postponed until the Board reviews comments after this new thirty-day comment period. In light of its fair housing obligations, BPDA should already have in place and enforce a requirement that translations of any important written materials be provided in applicable languages *simultaneously* with the English version, not as an afterthought.

If you wish to discuss any of these issues, as well as those raised in our initial comment letter, we may be reached at any time at the phone number below. Thank you for your time and consideration.

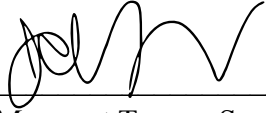
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<sup>19</sup> The English-language PDA and “Additional Information Document” were published in English on September 16, 2019.

<sup>20</sup> See *generally* Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons, 65 Fed. Reg. 2732 (Aug. 11, 2000); Affirmatively Furthering Fair Housing; Final Rule, 80 Fed. Reg. 42,272 (July 16, 2015).

<sup>21</sup> See *Lau v. Nichols*, 414 US. 563, 566—69 (1974).

Sincerely,

A handwritten signature in black ink, appearing to be 'MT', written over a horizontal line.

Margaret Turner, Senior Attorney  
Joseph Michalakes, Staff Attorney  
Greater Boston Legal Services, Housing Unit  
197 Friend Street  
Boston, MA 02114



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

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## comments on Suffolk Downs Development

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**mary mitchell**

To: Tim.Czerwienski@boston.gov

Mon, Oct 28, 2019 at 2:38 PM

I am writing again with concerns for The Belle Isle Salt Marsh in reference to climate change in our not so far off future. **By allowing extensive and dense development to go forward at the Suffolk Downs site without first doing a study of how to preserve the salt marsh is to condemn the marsh to extinction.** The marsh will be sandwiched between a wall of rising seawater and a wall of impermeable development. With rising tides the salt marsh will need to migrate inland or it will simply become a bay of open water; further enhancing flooding, etc. in this area of Boston.

The salt marsh at Belle Isle is the largest remaining salt marsh within the Boston Harbor. Extensive studies have been done on the importance of these ecosystems. They are vitally important to thousands of different animals, insects and marine life. Belle Isle, specifically, is a critical stop over for the annual North/South coastline migratory pathways for a large assortment of birds. And most importantly salt marshes act like giant sponges; absorbing water during storms and help prevent flooding. We have heard great concern for flooding and resiliency of town resources and homes; but very little interest or concern for the life of this valuable salt marsh ecosystem. **Please focus on this aspect of our community and insist on a study of the marsh resiliency.**

Thank you, Mary Mitchell a Friend of Belle Isle Marsh

*Friends of Belle Isle Marsh*  
*PO Box 575 East Boston, MA 02128*

October 31, 2019

*Mary Mitchell*  
*President*

*Carina Campobasso*  
*Vice President*

*Daniela Foley*  
*Secretary*

*Erica T. Foley*  
*Treasurer*

*Barbara J. Bishop*  
*Director*

*Joanne McKenna*  
*Director*

*Gail Miller*  
*Director*

*Mary Mitchell*  
*Director*

*Ann Marie Murray*  
*Director*

*Elizabeth Regan*  
*Director*

*Suzanne Ryan*  
*Director*

*Karyl Stoia*  
*Director*

*Kannan Thiruvengadam*  
*Director*

Director Golden and The Board  
Boston Planning and Development Agency

"There is nothing like it. And there never will be."

– Belle Isle Marsh Supervisor Sean Riley, DCR

Dear BPDA Director Golden and Board members,

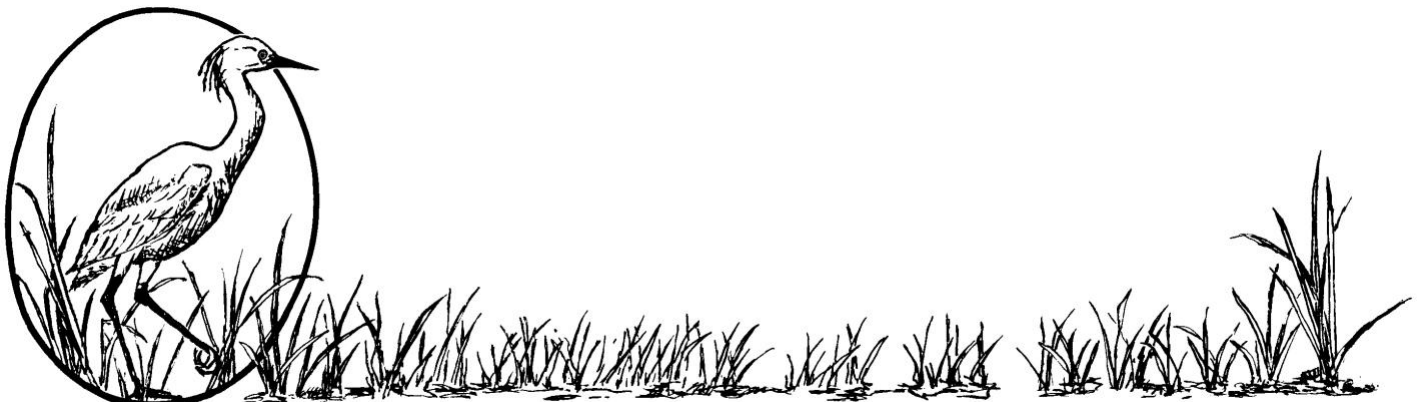
This is a picture of Belle Isle Marsh taken on Oct 28, 2019, during a King High Tide event, showing much of the marsh under water, a highly unusual condition that, if frequent, will have serious and lasting impacts on the marsh. This is an indication of the future of the marsh if nothing is done as the seas rise and storms get stronger and more frequent.



The Suffolk Downs PDA as it stands currently will cause the loss of Belle Isle Marsh unless timely and substantial mitigation steps are implemented. The loss of Belle Isle Marsh would be more than the loss of a unique recreational space for people. It would be the loss of a vital storm buffer that protects surrounding neighborhoods and infrastructure. It would be the loss of a carbon sink that helps to slow the progression of climate change. It would be the loss of a heat sink that helps to keep the surrounding area cool even as urban heat island effect increases with global warming. Mayor Marty Walsh's *Resilient Harbor* vision and the city's *Climate Ready Boston* and *Carbon Free Boston* plans call for the development of storm buffers, carbon sinks, and heat sinks. As Belle Isle Marsh already serves in those capacities, preserving it is a low-hanging fruit. And not preserving it is negligent at best.

**Our Request** | We therefore request a **protection plan for Belle Isle Marsh**. And we need that plan **now**, because the impending approval of Suffolk Downs PDA will preclude most if not all ways for the marsh to survive as it responds to rising seas by trying to migrate inland. We would also like to **meet with you** at your earliest convenience.

Without the timely and formal inclusion of impact analysis and mitigation planning for Belle Isle Marsh as integral steps in the Suffolk Downs approval and implementation process, the marsh will be neglected. We



*Friends of Belle Isle Marsh*  
*PO Box 575 East Boston, MA 02128*

humbly request that any approval of the PDA is subject to the formal inclusion of marsh impact analysis and mitigation options recommendation by a qualified professional agency.

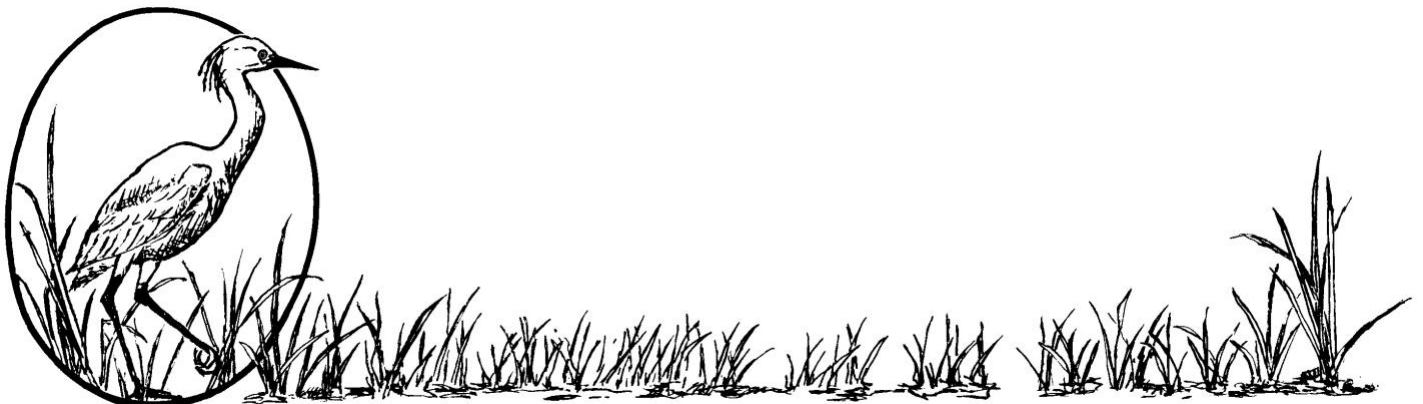
**Impacts** | We are dismayed that a 2-year IAG process with more than 200 hours of meetings has not produced a single page of anticipated impacts on the marsh. We submit our own list of expected impacts here.

Impacts on the marsh vegetation and wild life:

1. The marsh's natural hydrology (water flow) will be disrupted by impermeable surfaces of the development. This will increase the volume and duration of flooding in the marsh, which will in turn threaten and potentially destroy marsh vegetation as well as microbial, amphibian, and avian life.
2. The marsh will endure increasing traffic from the 20,000 residents of Suffolk Downs and those who work at the commercial establishments there. Without mitigation, this will result in increased litter as well as stress on the infrastructure of the marsh including boardwalks, trails, benches, and the observation tower. Pets that are brought into the marsh also stress the marsh's native wildlife.
3. The marsh's natural migration (movement inland) in response to sea level rise will be blocked. With no ability to move, and if no mitigation measures are taken, the marsh will effectively drown.
4. The marsh is home to 100's of non-migrating species. They will all lose their habitat if the marsh is lost. The saltmarsh sparrow is already endangered.
5. The marsh is a critical waypoint for migrating birds – where they stop to rest and feed. Its loss will be a death sentence to them as they will be forced to continue to fly while exhausted and hungry instead of resting in the place where instincts developed over millennia lead them.

Impacts on future Suffolk Downs residents, businesses, and other neighborhoods abutting the marsh, and on the region's climate mitigation and adaptation plans:

6. The marsh is a storm buffer. Its loss will put Suffolk Downs directly up against storms. Ocean water already crossed Bennington Street and entered Suffolk Downs last year, and this year's King High tides see the water at the brink, even without any storm action. As climate destabilization continues, with the chronic impacts such as sea level rise, and acute effects like storm surge, Suffolk Downs is under increasing risk, especially because of additional artificial complications like the fuel tanks on the Chelsea Creek side, of nuisance flooding, storm surge and wind damage.
7. The marsh is a carbon sink. Its loss will strain our already shrinking carbon budget.
8. The marsh is a heat sink. Its loss will exacerbate urban heat island effect as it worsens due to climate change.



*Friends of Belle Isle Marsh*  
*PO Box 575 East Boston, MA 02128*

**Our Ask in detail<sup>1</sup> |**

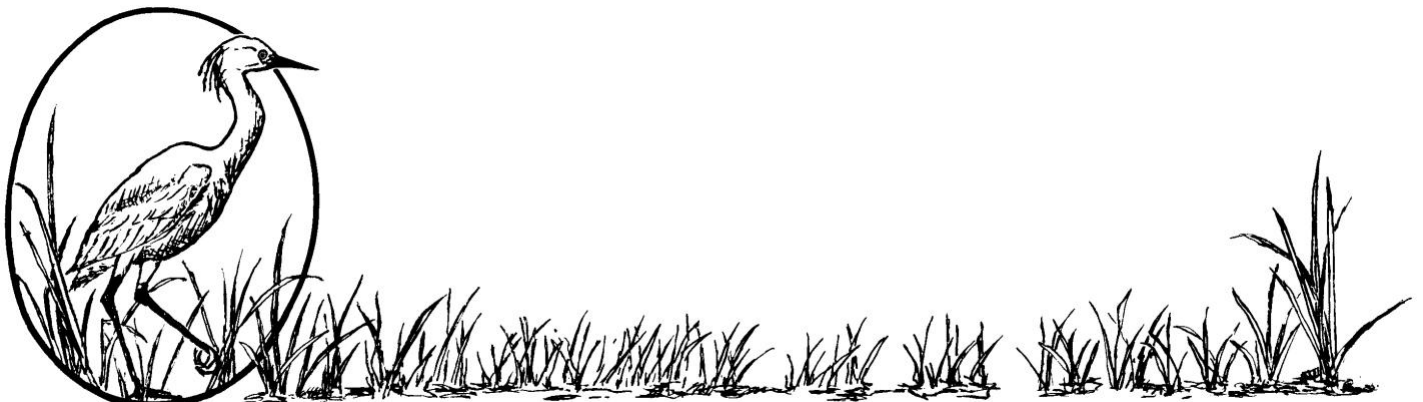
1. A protection plan for the marsh. We realize this may require multiple agencies and levels of government to be involved, but it has to start with you, as you are the agency responsible for approving a large and impactful abutting development. As part of that protection, plan, we expect to see
  - a. A wild-life impact analysis
  - b. A visitor impact analysis
  - c. Analysis of impact on marsh's natural response to sea level rise and other manifestations of climate change, with an associated timeline, with whatever levels of confidence possible regarding uncertainties; to be done by a coastal scientist<sup>2</sup> and be completed before any permits for buildings at Suffolk Downs are issued
  - d. Recommendation of mitigation options – exhaustive, out of the box, innovative, bold, and commensurate with the urgency of the climate crisis. The options should include (but not be limited to) the following:
    - i. Create a nature center with restrooms in the marsh to promote responsible use and to give people ways to enjoy and appreciate the unique green, open, and serene space that Belle Isle Marsh is.
    - ii. An adaptive salt-marsh management plan that takes into consideration the rising seas and its implications
  - e. Inclusion of Friends of Belle Isle Marsh formally in the protection planning, implementation, and oversight thereafter.
  - f. Allocation funds for implementation options and tools that may become available to us at a later point in time

**Our Support |** We fully support the Housing, Transportation, Open & green spaces, and Climate Resiliency & Emergency Support related requests from our fellow community organizations, leaders, and individuals, such as City Life/ Vida Urbana, Livable Streets, Greater Boston Legal Services, Friends of East Boston Greenway, Greenroots, IAG members and other individuals in the community.

Sincerely  
*Mary Mitchell,*  
President  
Friends of Belle Isle Marsh

<sup>1</sup> We believe mitigation measures are for experts to decide after a thorough study of impacts. These are some possible ways forward that we can think of, and by no means exhaustive. We do not have an impact list (much less mitigation options list) because the IAG process failed.

<sup>2</sup> The Friends have some pointers and are happy to share.







*The Commonwealth of Massachusetts*

HOUSE OF REPRESENTATIVES  
STATE HOUSE, BOSTON, MA 02133-1054

**ADRIAN C. MADARO**  
**REPRESENTATIVE**

1<sup>ST</sup> SUFFOLK DISTRICT  
ROOM 134

TEL: (617) 722-2400

FAX: (617) 722-2850

Adrian.Madaro@MAhouse.gov

VICE CHAIR:  
TRANSPORTATION

POST AUDIT AND OVERSIGHT  
CONSUMER PROTECTION AND  
PROFESSIONAL LICENSURE

October 28, 2019

Mr. Timothy Czerwienski  
Boston Planning & Development Agency  
One City Hall, Ninth Floor  
Boston, Massachusetts 02201

Dear Mr. Czerwienski:

I write to you regarding the Suffolk Downs Redevelopment Project (“Suffolk Downs”), and to discuss the projected impacts this project will have on my neighborhood and constituents of East Boston. Situated on a 162-acre site straddling East Boston and Revere, Suffolk Downs will be the largest property development in either community's history. Therefore, the impacts it will undoubtedly have on these communities will be substantial. The residents of East Boston in recent years have faced challenges related to transportation, housing affordability, and environmental sustainability. East Boston is an environmental justice community, one of the hardest-hit in the Commonwealth when it comes to traffic, public transportation challenges, air quality and noise, flooding susceptibility, and, more recently, a surge in housing prices. These issues will be further exacerbated by the construction of Suffolk Downs. Throughout the consideration of this project, it is vital that the issues facing our neighborhood be thoroughly comprehended and addressed in the planning, construction, and development of Suffolk Downs.

After a year of studying this proposal, engaging in and observing the community process, and speaking with constituents to understand their views and feedback, my office has identified how Suffolk Downs affects each of the major issues discussed below, and suggests how to mitigate its impacts, and become a thriving part of the East Boston community. I acknowledge the transparency and engagement of HYM Investments, specifically founding partner and managing director, Thomas N. O'Brien, and appreciate their willingness to listen to the community's concerns and feedback. I am confident that many if not all of the following recommendations are in alignment with HYM's goals, as we all hope to see positive changes not only at Suffolk Downs, but in the surrounding areas, as well.

## **Transportation**

East Boston residents face a number of challenges across our transportation system, including outdated and insufficient public transit infrastructure, increased traffic congestion, and lack of connectivity to the rest of Greater Boston. In recent years, the neighborhood has experienced a rapid rise in congestion, placing streets in gridlock and clogging the harbor tunnels connecting us to downtown and beyond. At the same time, East Boston continues to be impacted by a lack of reliable, robust public transportation options, with buses and the Blue Line experiencing capacity issues, breakdowns, and delays. The combined effect has been increased difficulty in moving around the neighborhood, and to and from East Boston into the city. This is the transit landscape into which Suffolk Downs enters.

When fully built, the Suffolk Downs site proposes to be home to up to ten thousand units of housing and a number of businesses, retail venues, hotels, and restaurants. This will add an infusion of thousands of new daily trips to an already overcrowded system, affecting our roads and public transit alike. An addition of this size to our transportation network is untenable with our current traffic situation. Not only would these additional trips further cripple our regional transportation system, but the resulting congestion would have the effect of deterring people from living in, working in, and visiting Suffolk Downs. A project of this size can only be realized in conjunction with an overhaul of the transportation network in East Boston. This is a process in which Suffolk Downs must commit itself as a fully engaged, fully invested partner.

The gridlock which currently exists in East Boston is emblematic of increasing congestion throughout Greater Boston. This increase, however, is especially acute along the Route 1A corridor, and can be largely attributed to two factors. First, there has been an increase in commuter traffic from the North Shore, which primarily travels along Route 1A, past the Suffolk Downs site. The second is the number of vehicles travelling to and from Logan International Airport (“Logan Airport”), which has spiked since the introduction of ridesharing services. This traffic comes to a head at the Sumner, Callahan, and Ted Williams Tunnels, crossing underneath the Boston Harbor to and from Downtown. These tunnels have a bottleneck effect on traffic. Additionally, the prevalence of wayfinding technology, such as Google Maps and Waze, whose algorithms indiscriminately direct drivers to take the shortest route available, steers vehicles off the highways and along local streets in an attempt to bypass traffic. This practice has led to a surge in cars on East Boston streets, creating backups not only on major arteries and the tunnel toll plazas, but also on small neighborhood streets. This idling traffic decreases quality of life, hurts our economy by reducing productive work hours, and contributes to the burden of air pollution, which is already substantial due to vehicle activity at Logan Airport.

Suffolk Downs, as a new addition to the neighborhood directly abutting Route 1A, will invariably be affected by these same conditions, and will most likely contribute to them as well. No matter how great the site’s emphasis on public transportation, cars will realistically, to some degree, still be part of the new development. This is anticipated in the number of parking spots currently planned on-site, and is clear from precedent developments such as Assembly Row, which experiences a high volume of traffic despite having its own MBTA station. Mitigation will be essential to offset the effect of the number of vehicles which Suffolk Downs will be injecting

directly into a high-congestion corridor, and may even be able to play a part in a wider array of solutions to alleviate congestion in the area.

The HYM Investment Group (“HYM”) has proposed a number of roadway and intersection improvements in East Boston, Revere, and surrounding communities, the result of a far-reaching traffic study, which they believe will aid in relieving congestion and improving traffic flow along the Route 1A corridor. These suggestions include, among other improvements, reconfiguring intersections, revising signals and signage, and widening Route 1A to three lanes in each direction for a portion near the Suffolk Downs site. While commenting on each of these suggestions specifically would be tedious, particular scrutiny must be paid to the proposal to widen Route 1A. Precedent suggests that widening the highway only invites more congestion, and is an unsustainable solution which would be ineffective in solving local traffic issues. In addition, such a widening would only happen in the immediate vicinity of Suffolk Downs, with the highway remaining two lanes before and after--and even narrowing to a single lane approaching the Sumner Tunnel, rendering the lane increase more harmful than helpful in that it would most likely create a bottleneck. Our emphasis in reforming our transportation system should be on moving more people, not more cars, promoting transportation improvements which facilitate high-capacity transportation, including HOV lanes, bus rapid transit (“BRT”), increased MBTA investment, and exploring partnerships for water transportation. Instead of focusing on expanding lanes on Route 1A, efforts would be better spent toward promoting efforts to reduce vehicle traffic and improve flow through other road improvements. Such improvements are good in principle, but in order to be effective, it will be important that specific proposals are developed in conjunction with the Massachusetts Department of Transportation and the Boston Transportation Department.

The traffic plan for Suffolk Downs must also give thorough consideration to the possible effects of transportation network companies (“TNCs”), such as Uber and Lyft, used by visitors and residents. Businesses planned for location at Suffolk Downs, such as restaurants, bars, hotels, shops, and other public venues are all prime destinations for passengers using ridesharing apps. Recently, such services have been shown to be a major component of regional traffic issues, with their effects especially acute in East Boston as the host community to Logan Airport. In 2018 alone, there were twelve million trips to and from Logan Airport, five million of which were deadhead trips - trips that lacked any passengers. These additional vehicles have contributed to a large spike in congestion felt throughout our neighborhood. The traffic plan for Suffolk Downs must realistically evaluate the expected number of TNCs at the site, and introduce logistical infrastructure which can limit the quantity and effect of these vehicles. Such measures might include dedicated drop-off and pick-up areas, and other solutions and incentives which promote pooling and prevent deadhead rides.

In addition to rideshare apps, Suffolk Downs also has the opportunity to plan ahead for a new advancement in transportation technology: micromobility devices, such as bikeshares and electric scooters. Legislation and regulations on these technologies are currently being considered and implemented on the state and municipal levels. Micromobility devices show potential for serving as “last mile” transportation, useful for someone to travel around the Suffolk Downs site, between the site and the surrounding communities, and to and from public transit. They also, however, come with their own set of challenges, with questions such as what

will be allowed on-site, availability to residents and visitors, docking and parking protocols, and usage on certain streets and pathways. HYM has the ability to plan for this technology in advance, taking into account best practices employed in other areas as the site progresses.

Another creative proposal is for HYM to invest in some designated cars for its residents to use when public transportation is not a viable option. There are many people in East Boston who primarily use public transit, but still own cars for trips out of town and to the supermarket, just to name two examples. If Suffolk Downs were to advertise that on top of its transit-friendly setting, there are cars available for residents to use (similar to a ZipCar, but for exclusive use of residents), this could go a long way in limiting the number of vehicles in the development. HYM should also consider offering incentives for people who are willing to live car-free, whether a reduction in rent or condo fees, credits for stores or markets on site, subsidized MBTA fares, and other innovative perks.

HYM has proposed to make the Blue Line the “front door” of their site at Beachmont and Suffolk Downs Stations. This is a commendable and forward-thinking goal, in line with the principles of transit-oriented development. In addition to this, they have also outlined plans for shuttle systems throughout the site and a commuter shuttle back and forth from locations such as downtown Boston. HYM has also planned for bike and pedestrian paths, as well as more ambitious proposals, such as a commuter rail connection at Wonderland Station. These plans, from the most simple to the complex, are important for incentivizing the use of public transit and reducing vehicular traffic for the site. But, this can only succeed if public transit receives robust attention and funding to encourage people to make it their primary mode of transportation to and from the site. HYM must be a fully-invested partner in this process in order to make it a reality.

Today, public transportation throughout the neighborhood is hindered by a number of issues; the lack of a direct connector between the Red and Blue Lines, the need for signal and power upgrades, as well as capacity expansion along the Blue Line, the lack of an inner-harbor ferry system, the need for improved bus service and BRT, the limits of late-night options, among others. All of these issues have an effect on Suffolk Downs, and finding solutions will be essential to facilitate greater connectivity to and from the site, and encouraging future residents and visitors alike to view public transit as the best mode of transportation available.

To make public transportation welcoming at Suffolk Downs, it’s important that the site’s “front doors,” Suffolk Downs and Beachmont stations, are well-maintained and welcoming. Both stations are currently in need of cosmetic and infrastructure improvements, with Suffolk Downs station the more critical of the two. While the overall design and construction of the station is good, it stands in severe need of maintenance. This includes resurfacing of the platform, improvement of drainage, and the repair and replacement of corroding metal and concrete throughout the station, such as on the stairwells, overhead pedestrian walkway, and platform awnings. Additionally, upgrades such as increased fare boxes and gates, and the addition of amenities such as elevators and escalators may also be desirable to improve accessibility and capacity with the anticipated increase in ridership. Suffolk Downs must be fully committed to the rebuilding and continued maintenance of their eponymous station in order to facilitate ridership.

Improved Blue Line service will also be essential in drawing commuters to Suffolk Downs by means of public transit. Signal and power upgrades along the line will result in improved reliability, reducing the risk of delays and breakdowns. These upgrades also make it possible to expand capacity along the Blue Line through the introduction of additional train sets, which will be essential in handling additional capacity from Suffolk Downs, as well as increases in passengers from a growing commuter population along the Blue Line corridor as well as to and from Logan Airport. Additional train sets will allow for reduced headways, especially during peak transit hours, and reduce instances of overcrowding and crush capacity situations. Making the Blue Line more reliable, more frequent, and more comfortable to ride greatly enhances its appeal for those considering public transportation options to access Suffolk Downs.

The lack of a direct rail connector between the Blue Line and Red Line also hinders East Boston's connectivity with other surrounding areas, such as Cambridge, Somerville, the Seaport, and South Boston. This missing link, and the hassle of transferring by way of a third line, makes it more difficult for residents to access opportunities along the Red Line corridor, including high-opportunity areas where many new residents may work. Additionally, it disincentivizes travel to East Boston for residents living along the Red Line. Increased connectivity to sites like these is important for the attractiveness of Suffolk Downs as a residential and business location. Their support for the Red-Blue Connector has been greatly appreciated, and it is critical that HYM continues to be proactive in supporting the community to achieve this long-awaited goal.

Increased congestion in East Boston has affected bus service, including normal MBTA buses, the Silver Line, and private shuttles, all of which are reliant on public streets for much or all of their routes. Traffic congestion makes bus schedules unreliable and service unevenly spread. This is a hassle to those who must take the bus and a significant disincentive for those who have a choice in transit options beyond bus service. These issues speak to the need for, in addition to decreasing congestion, investment in BRT and dedicated bus lanes, to speed up bus service and make it a reliable, speedy, and attractive alternative to car traffic.

HYM's plans to introduce shuttles both within the site and to and from important locations, such as commuter rail stations, are important pieces of the plan to encourage connectivity. These shuttles should be robust and provide incentives which outweigh private vehicle commutes. However, these shuttles will face the same issues as buses across the region unless better practices are introduced to make them appealing, rapid transit options. Dedicated bus lanes would allow both public buses and shuttles to move quickly and bypass traffic with ease, the best use of any proposed additional lanes. It is also important that public MBTA bus service is integrated into the new development, between the growing Suffolk Downs site and the areas around it, to promote accessibility and integration of important community infrastructure. HYM must be a willing and eager partner to work among stakeholders to make BRT in East Boston and along the Route 1A corridor a reality.

The revitalization of an inner-harbor ferry network, connecting the East Boston waterfront to those in Charlestown, the North End, and the Seaport will also be important to increase use of public transit. Not only will it provide an additional commuter option for residents, with the potential to help reduce congestion on other transit modes, but it will also be critical in activating the East Boston waterfront. Although Suffolk Downs does not lie directly on the waterfront, the

connection between these two ends of the neighborhood will be important for drawing visitors to East Boston, something that will be mutually beneficial for our community as a whole. HYM should be a partner in the discussion about how to implement and fund water transit in East Boston. HYM's insight into expanding the reach and impact of water transportation to Orient Heights and Suffolk Downs will be invaluable in shaping a system that works for our entire community.

In addition to the inherent value of reducing congestion and improving various means of public transit, these goals when combined have the critical effect of building redundancy into our local transportation system. In terms of connectivity with the rest of Boston, East Boston is an island, separated by the Boston Harbor. Our community has frequently experienced instances where a breakdown in the Blue Line, or gridlock in the harbor tunnels, impeding private vehicles, rideshares, and buses alike, has left hundreds stranded during peak commuting hours. We have seen occasions where small water taxi docks have begun to submerge beneath the water line under the weight of all the passengers looking to use these services during a breakdown, with no ferry alternative to turn to. Redundancy is critical for this transit corridor to remain up-and-running even when something goes wrong, and will prevent Suffolk Downs, along with the rest of East Boston, from becoming an island separated from the rest of the city when such inconveniences inevitably re-occur. These redundancies also encourage faith in the public transit system, allowing people to truly rely on it and consistently choose it over private vehicle modes of transportation, even in inclement weather.

Lastly, a critical effort across all modes of transit will be the expansion of late-night services, which is severely lacking in the Boston area. Our neighborhood's geographical separation from the rest of Boston means that, once modes of public transportation have shut down for the night, the only two options which remain to get home are either to drive a private vehicle, or to take a rideshare, both of which can be prohibitively expensive for certain populations. Expanding late-night service is important for two reasons. First, it facilitates the expansion of night life, allowing our community to grow both our economy and nighttime culture, both of which are in the best interest of Suffolk Downs. When residents and visitors do not need to worry about catching the last train home or risk being stranded on the wrong side of the harbor, it allows them to stay out later, socializing with friends and patronizing local businesses. More importantly, late night service is critical to providing an affordable transit option for workers with evening and night shifts. For working class members of our community staffing the hotels, hospitals, office buildings, bars, and restaurants fueling this economy, paying for a car or nightly rideshare represents a significant portion of their wages. Late night public transportation options are important to Suffolk Downs, for both the businesses that will be located there and those who will work in them. HYM must be a partner in achieving better late-night public transit options, to allow workers and patrons alike to have a reliable, affordable, and safe option to commute home.

### **Housing Affordability**

Housing affordability is one of the greatest issues facing East Boston residents today. Over the past several years, East Boston has seen a surge in housing prices, with both rental and ownership options becoming scarcer and less affordable to residents. This is emblematic of a larger housing crisis across Massachusetts, a result of a lack of adequate low-moderate income

housing, which is especially acute in our neighborhood. East Boston has historically been a working class, immigrant community, whose affordable housing stock offered accessible rental and home buying options. The neighborhood, however, has experienced a wave of gentrification and development in recent years, with rents skyrocketing and many apartments being converted into condominiums with prices beyond the reach of many longtime residents. This is despite a development boom in East Boston which, while increasing the number of new units, is not doing enough to provide affordable options for existing residents. Newer, more expensive developments have had the effect of contributing to increasing rent prices across the neighborhood. The cumulative effect of these changes has been an increase in displacement of longtime residents, traditional working class, and immigrant families, a trend which threatens to permanently tear the fabric of our neighborhood.

When completed, the Suffolk Downs site proposes to contain up to ten thousand units of housing, the largest single project in Greater Boston. While this will go a long way towards addressing housing shortages in the area, the introduction of these units will have a substantial impact on local housing prices, not only on-site, but also in the surrounding community. While rising housing prices will benefit some, Suffolk Downs has the potential to raise prices in East Boston, exacerbating an already strained affordability crisis.

However, Suffolk Downs also has the potential to positively impact the local housing situation through the introduction of affordable units. Suffolk Downs is currently on track to introduce the largest number of affordable units in the city's history, an exciting opportunity with the potential to allow more families and longtime residents to remain in the neighborhood. But there is still room to go further than the minimum requirements of thirteen percent currently set by the city of Boston for affordability, and doing so will be crucial to making the impact that is truly needed for a project of this size. HYM needs to offer more affordable units, set at a lower threshold of affordability so that they are accessible for the populations that need them most.

A frequent and accurate criticism of the affordable housing process in our community is the definition of Area Median Income ("AMI") as it is applied in the city of Boston. Anyone reasonably familiar with local geography would view the AMI map under which East Boston falls with considerable skepticism. This map groups our community in with wealthy suburbs, while leaving out nearby cities which have more similar demographic and socioeconomic compositions to our neighborhood. The result is a calculated AMI which far exceeds reality for East Boston and the surrounding communities. This has the effect that many units listed as "affordable" under these criteria are oftentimes still too expensive for the populations which they are intended to benefit. To rectify this issue, HYM should work with the city to lower the percentage of AMI at which each unit is offered. This will ensure that these units can truly be accessible to working-class and low-income populations from East Boston and surrounding communities.

Suffolk Downs has excelled at putting a strong emphasis on senior affordable units throughout the site. This is a component of affordable housing which is critical to fighting some of the worst effects of displacement. Elderly residents are often disproportionately affected by rent increases and evictions. They are also among the hardest hit. Many have lived their entire lives in this neighborhood, and know no other place to call home. When displaced at an advanced age, many

find it difficult to adjust and rebuild. Suffolk Downs will allow more of these seniors to remain in their community and continue to be connected to the important social and support networks on which many rely.

In addition to senior housing, Suffolk Downs should also be building housing, both affordable and market-rate, geared toward families. East Boston has traditionally been a family-oriented neighborhood, an economical option for parents to raise children with access to a variety of community resources, and where strong intergenerational and extended family ties help to reinforce a tight-knit sense of community. However, rising prices throughout East Boston have made it increasingly difficult for families to remain here. A lack of family units has also persisted in new developments. Developers, citing “market demands,” rarely propose any project with units larger than two-bedrooms. Many new developments in East Boston also boast “microunits” with low square footage that makes it hard to imagine residents staying long term. We cannot design an urban landscape which has the effect of pushing families out. It is critical that Suffolk Downs incorporate affordable family units into the site to ensure that families continue to have a place in East Boston.

In addition to on-site affordable housing at Suffolk Downs, HYM will also have the option of paying linkage fees to the city of Boston in order to cover some of their affordability obligations. These fees go toward a fund for investing in the creation of affordable housing throughout the city. Should HYM pursue meeting their obligation through linkage fees, it is essential that such funds be specifically earmarked for affordable housing projects in East Boston. As mentioned, Suffolk Downs will have a substantial effect on local property and rental prices throughout the neighborhood amidst an existing shortage of low-income and working-class housing. For a project of this size, with such direct and acute impact on the surrounding community, it is critical that these funds are used to make a substantial investment in local affordable housing. To redirect any of these funds away from East Boston would be putting an unfair burden on our neighborhood.

As an alternative to creating additional affordable inclusionary development policy (“IDP”) units on-site at Suffolk Downs, HYM could also consider funding off-site programs to preserve existing housing stock in East Boston. There are a number of organizations, such as the Neighborhood of Affordable Housing (“NOAH”), the East Boston Community Development Corporation (“EBCDC”), and others which buy and maintain existing housing stock in the neighborhood to keep them as affordable units for local residents. There is evidence to suggest that this is a more cost-effective way of generating affordable housing, it being less expensive to purchase and preserve existing buildings than to erect new structures with the current costs of construction. This would be another way for HYM and Suffolk Downs to drive the creation of affordable housing, offsetting the impacts of new developments and supporting important community institutions in their vital work.

### **Sustainability and Climate Resiliency**

Thoughtful development is critical to promoting climate resiliency. As a coastal community, East Boston is particularly susceptible, and has already been impacted by the effects of climate change. Situated on low-lying, partially filled land and bordered by Belle Isle Marsh, the



shoreline, and Chelsea Creek, any development at Suffolk Downs must place resiliency at the forefront of its planning process. To ensure the sustainability of the development, Suffolk Downs must be ready for the impacts of climate change, and must contribute to the resiliency of the surrounding areas, including neighboring Orient Heights, existing shoreline, the Belle Isle Marsh, and a restored Sales Creek.

Suffolk Downs must also take a leading role in promoting sustainability across the site, working toward energy-efficiency, zero-waste and carbon-neutral goals, through measures which are practical, yet ambitious. Suffolk Downs should strive to achieve the highest possible Leadership in Energy and Environmental Design (“LEED”) certification standards across new construction, and explore options for placing renewable energy sources, such as solar panels, on-site. Efforts should also be made to build in systems which promote low-waste living and operations for the residents and businesses which will occupy the site. Such measures could include electric vehicle charging systems, water recycling and reuse systems, and site-wide single-stream recycling and composting programs, among other options. These investments will not only make Suffolk Downs a more sustainable development, but will also distinguish the site and make it a more attractive location for sustainability-minded residents and businesses alike.

HYM’s proposal for Suffolk Downs is commendable for its focus on resiliency and attention to achieving sustainability throughout the site. The development team has been thorough in establishing both the general principles and specific details of a plan which will not only protect their own site, but contribute to the broader resiliency of the community and its natural resources. However, as the impacts of climate change become more and more apparent, we must continue to strengthen our sustainability goals. Fortunately, with each passing year green technology becomes not only more advanced, but also more affordable and accessible. The buildout of this development is projected to take twenty years, over a number of phases. The Boston Planning and Development Agency (“BPDA”) must be prepared to hold Suffolk Downs to increasing standards as the project progresses, and HYM must be committed to reevaluating each successive phase, updating their goals to match increased capacity for sustainable development. These improvements are an investment in the future of this site and in our community, and I encourage the commitment to resiliency be continued with the highest diligence.

### **Building a New Neighborhood**

East Boston is a community of neighborhoods, subdivided into several distinct sections: Eagle Hill, Jeffries Point, Orient Heights, and more. With the development of Suffolk Downs, neighbors are preparing to welcome another neighborhood into the East Boston community. As the Suffolk Downs site is designed and constructed, it is essential that it is planned as a neighborhood, geared towards fostering community, and seamlessly integrated as a part of East Boston.

The precedent for large mixed-use developments of this scale are projects such as Assembly Row, Wellington Circle, and the Seaport. These sites combine ground-level retail and office space alongside multifamily residential towers, and generally some component of open space.

Though a popular format, continued discussions have shown that this is not the sort of project many East Boston residents want in their neighborhood.

Projects like Assembly Row and those found at the Seaport are sleek, modern, commercial successes. But the common overarching criticism of them all is that they fail to be spaces that foster the development of community. These large projects sit in urban spaces like solitary islands, their designs and composition engendering a membrane of separation between them and populations which surround them. They lack services like police stations, fire stations, and schools, public amenities such as libraries, community spaces, and engaging, accessible community green space. Suffolk Downs will develop the last major untouched section of East Boston, and will be built right up alongside the existing neighborhood, not separated by highways, open space, or any other physical barriers. It is important that in creating a plan for this site, HYM is proactive in avoiding the creation of any intangible boundaries that isolate this new area from the rest of East Boston. Though the traditional components of mixed-use development - retail, office space, and multifamily residential buildings - will remain the backbone of the site, they must be designed with a focus on creating a new part of the East Boston neighborhood at Suffolk Downs.

One aspect in which HYM has shown great commitment toward integrating the site with the wider neighborhood has been in designing the transition from Orient Heights along Waldemar Avenue into Suffolk Downs. HYM worked diligently with abutters to address their concerns and to create a design which smoothly transitions between the taller, denser interior of the Suffolk Downs site and Orient Heights, which is primarily comprised of smaller single- to three-family houses. An improvement on Suffolk Downs' original design, the community-informed plan demonstrates HYM's capacity to work with residents to address their needs and to integrate this site into the fabric of East Boston. In addition to a gradual transition in height and size, this plan also calls for features such as a neighborhood park, walking and bike paths, and a rehabilitation of the Walley Street dead end through the creation of "Belle Isle Square," which will serve as natural connection points between the existing and planned parts of the neighborhood.

Another point at which HYM has excelled is in the amount of open space which will be available to the community. The preservation of this open space will be a vital addition to the neighborhood, giving residents areas to congregate, relax, recreate, exercise, and host events. HYM has further demonstrated this commitment by giving the city ownership of land near Orient Heights and 50% of programming rights in the open space throughout the Suffolk Downs site. Moreover, HYM has ensured the community that the entirety of its public space will remain such in perpetuity, a significant promise that will have a positive effect on the entire neighborhood. Additionally, by committing to building this open space in phases during the construction period, residents will be able to start benefiting from these improvements immediately and this will allow for incremental planning and adjusting as the project develops. In designing this open space, it will be important to gather community feedback regarding how it should be used and what programmatic features would be best utilized by residents. Everything from playgrounds to dog parks, from basketball courts to soccer fields have been brought up in community discussions, and each would contribute to activating and encouraging the use of Suffolk Downs' open space. This open space should be active and dynamic. It should offer opportunities for engagement in all seasons and hours of day, and must carefully balance the

desire for preservation and maintenance with the flexibility to truly allow people to harness the full potential of this important resource. This open space will be a key selling point for Suffolk Downs, and a pivotal aspect of integrating the site with the rest of the neighborhood.

Many residents have asked about the existence of community space and public amenities at Suffolk Downs. Community space for meetings, events, and recreation has been a critical asset in strengthening neighborhood bonds and fostering East Boston's robust activism of nonprofit and community groups. In addition, many have asked about basic public amenities which are common in any part of the neighborhood, such as fire stations, schools, and libraries. Suffolk Downs must have a vigorous plan for embracing community space, activating nonprofits, and fully accounting for how residents will be served by public amenities. Further, if Suffolk Downs itself will not have its own public safety stations, libraries, and the like on-site, HYM must contribute to bolstering these existing resources within the East Boston community, as the population that utilizes them will significantly increase with the addition of 10,000 housing units.

It is also important that HYM prepare to engage the local workforce and attract local businesses to work and operate on their site. The businesses coming to Suffolk Downs have a ready and eager workforce in the East Boston community, willing to learn new skills and to devote themselves to any position with dedication and enthusiasm. HYM should support any workforce training needed to prepare East Boston residents for the employment opportunities at Suffolk Downs. Additionally, HYM should emphasize bringing local business owners into some of the retail and office space on the site. East Boston has a thriving business community, much of which would be eager for the new opportunities presented by this development. Logan Airport has already engaged some of the neighborhood's most popular restaurants to locate on their property, realizing that the exciting culinary scene in East Boston offers more enticing options for passengers than standard airport chains. Suffolk Downs is similarly presented with an opportunity to distinguish itself from the many mixed-use developments offering similar chain options, and present a more distinctive draw and local flavor to potential customers. Many people who visit East Boston talk about the culture and the food as being unique draws to the neighborhood. A massive development like Suffolk Downs can have the effect of embracing and enhancing that reputation, or quelling it. I deeply hope that HYM will contribute further to what makes this neighborhood so great, building up the local businesses and restaurants, in turn helping East Boston while also satisfying its residents, visitors, and customers alike.

Suffolk Downs should strive to be a unique and distinct site, breaking from the common mold of mixed-use developments by more than just a few simple façade changes. Not only will this serve to make the site more attractive to businesses and residents, but it will also better allow Suffolk Downs to integrate into the East Boston community. Suffolk Downs should seek to pilot new and innovative programs, pursue distinct, exceptional architectural and design characteristics, and integrate the natural and historical features of the site in exciting ways. By making Suffolk Downs a landmark, it serves the dual purpose of making the site stand out among its competitors, and enhancing the East Boston neighborhood with an innovative new district.

## **Continuing the Public Process**

Over the past year, HYM has carried out an extensive number of community meetings across East Boston, presenting to residents about plans for the site, meeting with abutters, and soliciting feedback from the community. I appreciate all of the hard work and diligence that HYM has devoted to participating in the public process, and I believe that these efforts should not be understated.

At the same time, however, there are concerns from residents about how effective this outreach has been in certain parts of the community, as well as the extent to which their involvement in this process is meaningful. These criticisms are not unique to the development at Suffolk Downs, but rather are systemic issues which numerous public processes in East Boston have faced. As they continue through the public process, HYM has the opportunity to enhance their community outreach, engaging with a wide cross-section of the community in thoughtful, productive dialogue.

HYM should continue to foster public discourse through equal and collaborative partnerships with community-based organizations whose members and leaders reflect the underrepresented sectors of our community. These groups and organizations have unique insight into the most meaningful ways to diversify discussions around important issues, including housing affordability and matters affecting our quality of life. By forging substantive connections with entities that have established themselves firmly in underrepresented communities, HYM will be better able to make informed and innovative decisions about the way it engages in public dialogue.

We are grateful to have HYM as a partner, engaging with the community in good faith, and committed to robust and meaningful discussion as this process moves forward. We are hopeful that the BPDA and HYM will each consider the comments and concerns outlined above and take action to implement solutions. I look forward to working with all parties to ensure that what is built at Suffolk Downs benefits our community and its current residents in both the short- and long-term.

## **Conclusion**

Throughout this letter I have outlined some of the most important issues impacted by the Suffolk Downs Redevelopment Project and potential solutions. With changes to our housing, transportation, environmental, and community landscape imminent, residents of our neighborhood have been proactive in evaluating the proposal HYM has put forward. More than any traditional development, Suffolk Downs demands a heightened scrutiny due to its size, scale, and impact. HYM is not only constructing a new building or a group of buildings, but an entirely new neighborhood within the broader neighborhood of East Boston. It is important that the BPDA and HYM remain involved in a comprehensive, enhanced community process to allow residents to see the changes made following this comment period, to understand what feedback was incorporated, and to weigh in on the updated status of the project. I have no doubt that HYM and the BPDA will continue to work with all stakeholders to bolster the community process,

increase public awareness and participation, and create a final plan which enhances East Boston and builds upon the essential character of our neighborhood.

Putting this project into perspective, the Suffolk Downs Redevelopment Proposal is a plan for the creation of an entire new neighborhood, filling in the last remaining vacant section of East Boston. The impacts Suffolk Downs will have are both substantial and permanent, and whether they are beneficial or detrimental to the community depends on the results of this ongoing dialogue. The decisions we make through this process will be critical, and will forever define the future of our neighborhood and the fabric of our community. We owe it to the residents of East Boston, as public servants committed to preserving, enhancing, and growing the neighborhood, to make sure that we get it right.

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

Sincerely,



**Adrian C. Madaro**  
Representative  
*1st Suffolk District*



# HARBORKEEPERS

434 Chelsea Street, 2nd Floor, East Boston, MA 02128

October 31, 2019

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Boston, MA 02128

Re: Suffolk Downs Redevelopment Project Planned Development Area

Dear Mr. Golden and Mr. Czerwienski,

Thank you for the opportunity to present comments on behalf of Harborkeepers for the Suffolk Downs Amended Planned Development Area.

### Climate Resiliency and Mitigation

As part and parcel of its mission, The Harborkeepers is particularly focused on the climate resiliency and mitigation aspects of the development project. Our organization considers climate change and its impacts to our coastal city as a matter of urgency. Hence, we appreciate the willingness of the proponent to be forward-thinking on sustainable climate-resilient measures on the site. The DEIR has identified a series of potential impacts to both on-site and off-site wetlands resources and the stormwater management needs of those resources. According to the DEIR, the proposed site or a portion of the site was determined to be located in a 100-year floodplain and thus is subject to all federal, municipal and state building and zoning ordinances with respect to flood hazard mitigation. Thus, thorough compliance with the DEIR will be key to climate resiliency and to protecting both on-site and off-site delineated wetland resources, part of which is located in an ACEC (Area of Critical Environmental Concern) and adjacent to the last remaining salt marsh in Boston - the Belle Isle Marsh.. Based on the DEIR assessments and recommendations, it is critical that all on-site stormwater management measures being considered and proposed take into account all impacts off-site as well on both sides of the site, the Chelsea Creek and the Belle Isle Inlet as part of a more district-wide and comprehensive

climate and flood mitigation strategy. This requires more in-depth assessment and collaboration between municipal and state agencies as well as between East Boston and Revere community advocates, especially with respect to Green Creek and Sales Creeks.

The sub-surface infiltration systems, stormwater basin (outdoor performance theatre) as well as wet-proofing of buildings proposed are a big step forward in developing better standards for climate resilience development. Nonetheless, the DEIR specifically outlines that part of the BMP (best management practices) for the site should include "...a subsurface detention system, a detention basin, (Park basin) and a combination detention basin/subsurface detention system..." I'm not entirely clear as to whether current proposed measures are in line with the full DEIR recommendations. It is my understanding that the current SMS (storm management systems) BMP's in place are temporary as part of the requirements of the earlier phases of construction but that a larger BMP needs to be complied with in later build-out phases. Due to the historic nature of the Suffolk Downs site, much of which was built prior to the implementation of MassDEP's stormwater management regulations, the complexities of bringing the Suffolk Downs site up to compliance with current (and future) stormwater management systems and being that the City of Boston still has not approved nor implemented a *Local Wetlands Ordinance*, it is imperative that the proponent fully comply with the DEIR and MEPA requirements as a way of preserving and restoring the on-site and adjacent wetlands resources and as flood mitigation for the entire neighborhood. Harborkeepers looks forward to seeing the proponent continuing to work closely with the DCR, the owners and operators of the Bennington Street tide gate, pumping station and Belle Isle marsh as well as with wetlands advocacy groups such as the Friends of the Belle Isle Marsh, Harborkeepers and other relevant agencies and stakeholders on exploring additional nature-based solutions to the flood mitigation measures on Bennington Street and the Belle Isle Inlet. The proposed berm concept needs to be fully analyzed by experts and planned and designed with relevant agencies in East Boston and Revere municipalities but also with local knowledge and expertise from community stakeholders working on climate resiliency. There also needs to be clear understanding as to the costs of designs and constructions of building such berms and who will pay for them. The same applies to the 3 culverts that the DEIR has identified as needing upgrades and restoration along or connected to Sales Creek.

Given the project proposed will result in a total of 109 acres of impervious area, Harborkeepers would encourage the proponent to maximize the amount of square footage of open and green space beyond the 40 acres to utilize for further ecological restoration and climate mitigation beyond what was proposed. I have not seen additional information regarding the amount of green infrastructure and tree canopy proposed on the site which plays a critical role in the mitigation of extreme precipitation. Every tree planted and rain garden created is critical. We look forward to seeing the development of aggressive tree canopy and green infrastructure build-out in every possible space within the site.

There is indication in various documents as to whether the site, which is considered landlocked tidelands, requires a Chapter 91 license. Harborkeepers would like clarification on the delineation of landlocked tideland areas and whether the site is in fact subject to jurisdiction under 310 CMR 9.04.

#### Greenhouse Gas Emissions Measures

I have read through the data provided on the proposed Sustainability and Greenhouse Gas Reduction strategies under Program B. I am enthusiastic with the proponent's commitment to building a 50,000 sf residential passive house demonstration project, which would be the first of its kind in Boston. This could be a great opportunity to lead by example on net zero residential development as well as to use as an example in green technology and energy efficiency training apprenticeships with local residents.

#### Clean Energy Workforce Development and Economic Opportunities

Despite the development boom and economic growth of the City of Boston, much of the current labor-based, workforce opportunities are in the traditional building trades. In line with current City of Boston climate action plans and with such a large multi-year development project build-out, Suffolk Downs has the opportunity to be a game-changer in supporting initiatives that promote clean energy and energy efficiency training and apprenticeship programs that will specifically work with the East Boston and Revere communities, in particular helping build a pathway to clean energy jobs for local youth. I encourage the proponent to work with our municipal and state partners as well as local organizations to continue to explore these opportunities for the local community.

#### Emergency Management and Disaster Preparedness

As part of The Harborkeepers' resiliency work, we deliver community preparedness workshops with diverse populations in East Boston. Our direct community engagement work on disaster preparedness is more challenging when the existing disaster and emergency management infrastructure is not adequate for current residents. The proponent will essentially be building a new community in Suffolk Downs adding to the population of East Boston. We hope that the proponent is in active conversations with relevant emergency management municipal and state agencies to build into this project the opportunity for improved transportation and mobility modes and spaces that our community relies upon in the event of disasters and emergencies. This includes modes of egress, signage for evacuation or potentially places for sheltering in the event of major disasters.

#### Affordable Housing

We commend the proponent and City Councilor Lydia Edward's office for actively working on maximizing the affordable housing component of the Suffolk Downs redevelopment project. It is important to consider that the affordable housing waiting lists throughout the city are more than saturated. Average waiting time for an affordable unit for a family are extremely long, in fact more than 5 years and oftentimes up to 10 years. We hope that part of these negotiations include application priority opportunities for the residents of East Boston.



### Community Space as Public Benefit

As a local non-profit, small organization, we know first-hand the challenges of finding a community space to deliver our programming and hold events. Harborkeepers commends the proponent for committing to building 2,500 sf of ground floor civic space in Phase 1B of the construction. We look forward to potentially having additional community gathering spaces available as opposed to just one for the 161-acre site. With the critical need for local groups and organizations to have access to community gathering spaces in East Boston, it would be helpful to know more about how this proposed space will be available, who will manage its use and the strategy for ensuring equal access to all local groups and organizations.

Thank you for your consideration of these comments.

Respectfully yours,

Magdalena Ayed  
Executive Director

Cc: City Councilor Lydia Edwards  
State Representative Adrian Madaro  
Senator Joseph Boncore



October 31, 2019

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

Dear Secretary Beaton and Director Golden,

Thank you for welcoming comments on the Master Plan Planned Development Area 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.

We thank you for extending the comment period from October 16, 2019 to October 31, 2019. However, as a critically and as an immediate priority action, we recommend and request that the Agency extend the current comment period at a minimum, to November 7, 2019 for community review and input as the modifications to the PDA were not translated to Spanish until October 7, 2019.

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.

## **Open Space**

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 conclude that significant issues concerning transportation, climate change resiliency, open space, and natural resources remain unresolved for the Suffolk Downs proposal. In conjunction with Mayor Marty Walsh's updated "Climate Action Plan" to move the city towards its target of cutting citywide greenhouse gas pollution in half within the next decade, we would also like to express concern about the following, which we hope the Proponent will respond to before the Final Environmental Impact Report:

## **Urban Design**

While we are concerned that the building massing and block size at out of scale compared to surrounding neighborhoods, like Orient Heights, we are more concerned this sizing that will inhibit walkability and a sense of community for this new neighborhood. Many of the blocks in East Boston are in the range of 200-600 feet, Suffolk Downs is nearly twice that size. We encourage the developer to reduce the scale of the primary street network to create a neighborhood that matches the urban design scale of Boston and supports a livable environment for people living and working here.

As determinations about specific design and locations of active recreational facilities, including courts, fields, playgrounds and other areas, will be made as individual open spaces are developed, we emphasize the importance of keeping these amenities open to the public and that residents outside of the development have a say as to where they are built and that they are in proximity to transit.

We also ask that the Proponent and the BPDA translate the terms we have in square feet to terms and units community and other people outside of the development world can understand to understand the scale of the development being added to East Boston and the region.

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.

## **Parking**

While we are supportive of monitoring parking demand over the course of the project build-out, we believe that the 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.

1. Project does not include any enforceable provisions to achieve Mayor Walsh's mobility and mode shift goals;
2. Project should establish enforceable provisions tailored for site's proximity to public transit, with 50% non-private vehicle use Mode Share.

## **TAPA**

We are pleased to see the Proponent will enter into a Master Transportation Access Plan Agreement ("TAPA") for the Master Project with the Boston Transportation Department ("BTD") specifying the traffic mitigation and transportation improvements required for the Master Project. We ask that prior to the commencement or construction of each building in the Master Project, that not only the Proponent and the BTD specify the traffic mitigation and transportation improvements required for such building, but also work with the MBTA to examine, and provide solutions towards transit impacts along the Blue Line, specifically at Beachmont and Suffolk Downs stations. Development of this project is likely to cause congestion and increase wait times and overcrowding on platforms along all Blue Line Station stops. In the event the amount of traffic generated by the buildings in a completed Phase of the Master Project and the corresponding phase of development in Revere exceeds the amount of new average daily trips

identified in the Proponents calculations, we ask then that the Proponent work with the City of Boston and the MBTA to implement additional traffic demand management efforts that favor transit ridership to reduce the amount of traffic to the projected level.

## **Environment/Housing**

We are providing these comments based on our focus on transportation, while supporting the comments provided by individuals and groups working in East Boston on interconnected issues of sustainable and equitable development. 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 mandated 13% inclusionary affordable housing. We ask that the Proponent commit to 20% inclusionary units on-site at an average of 70% Area Median Income (AMI) with at least 500 units at 30% AMI and 500 at 50% AMI. 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.

Thank you for considering our comments.

Sincerely,

Ambar Johnson  
Program Director | LivableStreets



October 31, 2019

Tim Czerwienski, Project Manager

**Boston Planning and Development Agency (BPDA)**

One City Hall Square, Boston, MA 02201

Re: Suffolk Downs Redevelopment

Dear Mr. Czerwienski,

Neighbors United for a Better East Boston (NUBE), a neighborhood based organization that works to connect diverse neighbors that share our values to work together to better our community for all. We are following up with concerns expressed in our comment letter submitted on May 31, 2019 when we expressed our opposition and concerns regarding HYM proposed Suffolk Downs Redevelopment project to transform 161-acre site *"land into a highly-resilient, transit-oriented, mixed-use development with commercial office, retail, housing, and open space"*.

As an organization that aims to promote the values of transparency, accountability, and inclusion, the accelerated review processes used by HYM and BPDA is counter to our values and methods. The effect of these accelerated processes is the systematic exclusion of our community from the largest development project in Boston history. We support Lawyers for Civil Rights comment letter, Oct. 2019 which describes in detail many of our concerns about the flaws in the development review process as well as concerns regarding the Supplemental Information submitted on September 16, 2019. We are particularly concerned about:

1. **Lack of Translation:** HYM's continuous disregard for language access and failure to translate the Supplemental Information into Spanish. In addition, the lack of intentional effort to reach out to the Spanish speaking community of East Boston, home to more than 47% foreign-born Spanish-speakers.
2. **References to External Documents and Discussions:** HYM's failure to provide full access to documents and pertinent information. How can the community make informed and educated decisions without the proper resources?? Lack of access to all documents undermines the public trust and prevents the community from being able to hold HYM accountable to the public.
3. **Lack of Representation on the Impact Advisory Group (IAG):** The IAG is not reflective of the East Boston community and is not a comprehensive reflection of its diversity, particularly those that are most vulnerable. A project of this magnitude deserves the most inclusive community process to ensure that all voices are represented.
4. **Amount and Rental Pricing of Affordable Housing:** The commitment to 13% affordable housing at 70% of AMI is simply inadequate. It undermines the City's commitment to creating affordable housing across the city. Our community needs real affordability, and with the astronomical rise in rent due to the waterfront development it is imperative that HYM make a bigger commitment with no less than 50% committed to affordability based on East Boston's AMI.
5. **Stabilization Fund:** HYM's proposal of \$5 million to a housing stabilization fund is insulting and inadequate. This needs to be reassessed to provide a much more substantial percentage of the overall project and reflect the real need to stabilize East Boston from displacement, that many of our families are currently experiencing.
6. **Compliance with Climate Action Plan:** The current development proposal does not take into account the risks it creates for current residents, the risks of known climate change impacts for



future residents, and does little to contribute to mitigation. This undermines the City's commitment to carbon neutrality and climate change preparedness. The plan needs to ensure that all aspects of the development be zero net carbon or energy positive as well as submit Carbon-Neutral Building Assessment. Given the existing environmental burdens shouldered by East Boston, to do less with this development is unacceptable.

7. **Diversity and Training: Currently**, there is no commitment to hiring from within the neighborhood and this is unacceptable. Given the demographics of East Boston, the Suffolk Downs' workforce must be drawn from the community they serve. Specifically, it should include a commitment to hiring people of color that is proportional to East Boston and be largely bilingual in English and Spanish and in some cases multi-lingual. There should also be a plan for regular training and professional development that focuses on equity and inclusion.
8. **Use of Commercial and Rental Space:** The proposed commitments to support locally-owned, women-owned and minority-owned small businesses and nonprofits in Suffolk Downs' commercial spaces is currently inadequate. The city should reject any proposal that does not explicitly ensure residents are able to share in the wealth generated by this project with specific numeric goals that HYM can be held accountable to.

As East Boston residents, we want our community to have a vibrant, active, diverse, and healthy economy that allows our families to prosper and have the best quality of life possible. However, the high cost of living, unstable and poor quality jobs, criminalization of and discrimination against immigrants and people of color, and a political and social environment that doesn't promote community integration and healthy coexistence threaten the economic prosperity of our families. To achieve a fair economy and a better quality of life in East Boston, we believe local economic and housing development should be done with a balanced approach that allows for a healthy coexistence for all that currently live here. It is critically important that the decision making process is transparent, accountable, and inclusive. This means, in particular, a process that includes those in the community that are most impacted by this proposal. Based on our Fair Economy principals and demands we *demands all economic development plans, initiatives, and investment attend to the following needs and interests that will promote economic prosperity and a better quality of life for all residents of East Boston and beyond:*

- Availability of jobs and quality job training for East Boston residents.
- Protection of workers' rights and continuous education about workers' rights for workers and employers.
- Access to good quality basic and higher education for children, youth, and adults.
- Lasting stability in the community by assuring that residents and businesses can continue to live and operate in East Boston.
- Affordable and accessible housing to rent and to buy at the East Boston median income.
- Informed residents and small business owners about the availability and management of existing support services and resources.
- Effective community policing and good relations between law enforcement and the community.
- Free and unimpeded access to the waterfront and public spaces that are maintained in good condition.
- A healthy and pleasant neighborhood through efficient trash pickup and increased street cleaning and beautification in the community

We respectfully request that the proposed d plans for the Suffolk Downs Planned Development area not be approved until the above demands, concerns and our previous concerns expressed in our May 31st letter

be addressed and public hearing. In addition, we request that the comment period be extended 120 days to allow additional time for interested residents, stakeholders, and advocacy organizations to review all adjustments and revisions of the project. This would provide the time needed to adequately comment on HYM's proposals.

We thank you in advance for your attention in this matter. Please feel free to contact NUBE at 617-981-4010 or gmota@nubeastboston.org for further information or clarification.

Sincerely,

Neighbors United for a Better East Boston (NUBE) Community:

Gloribell Mota, Lead Coordinator	Falcon St., East Boston
Cristian Morales, Root Council Member	Falcon St., East Boston
Edward Funes Jr., Member Neighbor	Falcon St, East Boston
Enilda Lovo, Lead Logistics	Bennington St, East Boston
Juan Reyes, Member Neighbor	Bennington St., East Boston
Reina Reyes, Member Neighbor	Bennington St. , East Boston
Neenah Estrella Luna, Root Council Member	Saratoga St, East Boston
Dario Zapata, Member Volunteer	Brandywyne St., East Boston
Edina Perlera, Member Volunteer	London St, East Boston
Douglas Henriquez, Member Neighbor	London St., East Boston
Maria Aguilar, Member Neighbor	Marion St, East Boston
Haydee Mayorga, Member Volunteer	Monmouth St, East Boston
Reyna Alfaro, Member Neighbor	Saratoga St., East Boston
Daniela Ramirez, Member Neighbor	Trenton St, East Boston

Cc:

Mayor Marty Walsh

Chief John Barros, Economic Development

District City Councilor, Lydia Edwards

State Senator, Boncore

State Representative, Adrian Madaro

City Councilor At-Large, Michele Wu

City Councilor At-Large, Michael Flaherty

City Councilor At-Large, Althea Garrison

City Councilor At-Large, Annissa Essaibi George



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

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## Opposition to Suffolk Downs PDA

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**Nat Taylor**

Thu, Oct 31, 2019 at 8:23 AM

To: tim.czerwienski@boston.gov

Director Brian Golden & Project Manager Tim Czerwienski October 31, 2019  
Boston Planning & Development Agency  
One City Hall Square  
Boston, MA 02201

Re: Suffolk Downs Project PDA

Dear Mr. Golden and Mr. Czerwienski,

Thank you for the opportunity to comment on The McClellan Highway Development Company's Suffolk Downs Modified Planned Development Area (PDA) Proposal. I oppose the development until it reflects an extension of the surrounding community, instead of the current language which proposes to "create" (PDA Master Plan Redline, Section 1.5) a community. The following additions would support such an extension:

1. **Sustainability:** Protection of Belle Isle Marsh and a carbon neutral development commitment
2. **Transportation:** A more specific multimodal transportation plan that includes additional infrastructure and capacity
3. **Income-Restricted Housing:** 20% inclusionary units on-site set an average of 70% AMI

Without changes like these, the development risks exacerbating the already critically stressed neighboring communities to the point that quality of life is negatively impacted for all residents.

Thank you for considering these comments.

Sincerely,

Nat Taylor  
158 Cottage St 1R  
E. Boston, MA 02128



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

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**Re: Suffolk Downs Development Impact on Belle Isle Marsh**

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**Elizabeth Regan**

Thu, Oct 31, 2019 at 11:55 AM

To: tim.czerwienski@boston.gov

I am writing to you to express the extreme urgency of the present moment, as the City of Boston finalizes the terms under which HYM will move forward with development of the Suffolk Downs site. I am a long-time Board member of the Friends of Belle Isle Marsh. We have fought, since we were founded in 1986, to protect what is left of the largest saltwater marsh in Boston. The planned development, as currently proposed, utterly fails to address, or even acknowledge, the extent to which this giant development will alter the healthy functioning of the Belle Isle Marsh ecosystem. There has been much discussion about how to protect the Suffolk Downs site from rising sea levels and the onslaught of climate change, with no real understanding of how the massive development of the site threatens to overwhelm the marsh's ability to act as a buffer between the rising waters and the communities around it. You cannot protect the Suffolk Downs development without preserving Belle Isle Marsh.

This cannot be done without a real understanding of the interaction of Suffolk Downs, Belle Isle Marsh, and the waters in and around them. I urge:

- The City of Boston to require a scientific study of the interactivity of the Suffolk Downs site, Belle Isle Marsh, and their environs
- To accomplish this, that you work with the state's own experts in the Office of Coastal Zone Management (CZM), to task a coastal scientist with studying the hydrology and to model flooding scenarios, and based on this study, CZM should then develop a plan to address the threats.

We in the community have gone to many presentations about this project and have heard many promises. This is the last, best chance to deliver on those promises. Without a scientific study and a plan to address the effects of climate change on Belle Isle Marsh and the surrounding community, worsened by the massive development of the Suffolk Downs site, the survival of Belle Isle Marsh and the neighborhoods surrounding it as livable spaces (including the Suffolk Downs site) is not assured.

Very truly yours,

Elizabeth Regan

October 15, 2019

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:                Master Plan for Planned Development Area (DPA)  
                      Suffolk Downs Development Project**

Dear Director Golden:

Thank you for the opportunity to comment on The McClellan Highway Development Company's Suffolk Downs Modified Planned Development Area (PDA) Proposal.

With concern, respect and hope for our community, we submit the following comments about the proposed Master Plan for the Suffolk Downs PDA. Our comments are informed by the PDA documents published on February 1, 2019, the Supplemental Information Document (released May 1, 2019) and the BPDA request for additional information (submitted August 22, 2019). ZUMIX is a community-based cultural organization supporting the personal, artistic, civic and professional growth of low-income young people in East Boston.

We are concerned about the rushed approval of the proposed Suffolk Downs Development, without adequate consideration of the priorities of our working class and immigrant community. In a short period, East Boston has lost its affordability for much of our neighborhood, who are renters, families and community members who've built the culture of this place. East Boston's median income is closer to 30 percent AMI – an income-level that has been largely underserved by the city's provision of income-restricted housing. We urgently insist that the BPDA slow the permitting process for the proposed project to fully assess the impacts of such a large development. We request an extension of 120 days from date on which the Spanish translation of the Suffolk Downs Additional Information Documents was released. The Latin American families of ZUMIX cannot reasonably comment on this project when the information is linguistically inaccessible.

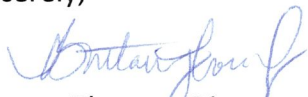
Additionally, the Suffolk Downs Development provides an unmatched opportunity to reduce the risk of displacement for low-income residents, if the City of Boston and the BPDA require a higher level of assured affordability. In coalition with several East Boston organizations, including City Life/Vida Urbana, Green Roots, MassCosh, Stand for Democracy, the Center for Cooperative Development and Solidarity and Neighbors United for a Better East Boston, we urge the BPDA to increase the affordability of this project to 50 percent affordability at 30 percent of AMI. We see the East Boston neighborhood disproportionately bearing the impacts of large development, and we ask the City of Boston to find local mitigation tools to preserve the stability of our neighborhood.

We have been working hard to support our families in navigating the disruptions that have come with evictions and redevelopment of local housing. A core aim of our work is to nurture creative community – where young people can lean on others through the bumps of adolescence. Displacement is a serious threat to the connectivity of our community. We have already seen East Boston High School lose about 200 students, after their families were forced to move outside of East Boston. We know that uprooting our young people carries negative outcomes: removing important social supports, requiring adaptation to new schooling environments, and introducing the financial instability brought by a move. We also know the BPDA and the City of Boston can find solutions to these threats.



We want to thank the BPDA for the efforts you have put into this process to date. We are available to help improve the outreach and participation of our low-income families in the area, and we appreciate the opportunity to comment.

Sincerely,



Brittany Thomas, Director of Creative Media + Technology



Carolina Ticona, Administrative Assistant



Rene Dongo, Radio Station Manager



Madeleine Steczynski, Executive Director



Daniel A. Arias, Video Intern



Lesly Monroy, Z-Tech Sound Technician



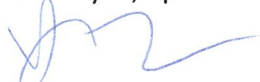
Chris Lee Rodriguez, Ensemble Leader and Guitar Instructor



Avi Salloway, Z-Tech Live Sound Coordinator



Abe Caban Reyes, Sprouts Intern and Teen Council Member



Jenny Shulman, Director of Operations



Sarah Saydun, Pathways Manager



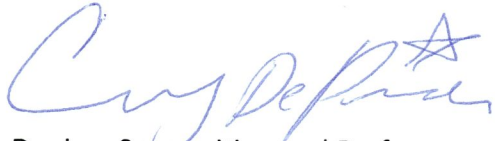
Will Rodriguez, Drum Instructor



Jesse Epstein, Video Coordinator



Jireh Calo, Piano Instructor



Corey Depina, Songwriting and Performance Manager



Ed Emerson, Creative Tech Manager



Kadahj Bennett, Instrumental Music Manager

Cc: Senator Joe Boncore; Representative Adrian Madaro; District City Councilor Lydia Edwards; At-Large City Councilor Michelle Wu; At-Large City Councilor Annissa Essaibi George; At-Large City Councilor Michael Flaherty; At-Large City Councilor Althea Garrison; Mayor Martin J. Walsh; Tim Czerwienski, BPDA Project Manager; Lina Tramelli, East Boston City Liaison.



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

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## Suffolk Downs Comments

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**BSLA Boston Society of Landscape Architects**

Fri, Nov 1, 2019 at 12:00 AM

To: tim.czerwienski@boston.gov

Good evening Tim,

I've been trying to submit a comment letter for Suffolk Downs and realize I don't think it went through. I submit the text here to you. Thank you!

The Boston Society of Landscape Architects (BSLA) is pleased to submit comments on the Suffolk Downs Redevelopment Project, especially in response to the Additional Information Document (AID) of September 16, 2019.

Founded in 1913 as the first local chapter of the American Society of Landscape Architects, today BSLA includes 660 landscape architect professional members and students throughout all of Massachusetts and Maine. BSLA connects, convenes, and celebrates landscape architects and the greater design community, as we work to advance the profession of landscape architecture and support the creation of extraordinary environments throughout the region and the world.

Suffolk Downs represents the promise of a TRULY extraordinary environment.

Suffolk Downs ("SD") offers a once-in-a-generation opportunity with influence far beyond ownership boundaries. It will serve as a model for other comprehensive developments in the region and across the country. It's critical to get this right.

There is so much to applaud in the approach currently taken by the developers and the cities of Boston and Revere, and we support and praise the work to date. The comments herein are intended to inform and encourage a robust and resilient public realm as the project moves ahead.

Overall, we echo many of the comments and concerns already offered by our public partners at the city and state including the BPRD, BPDA, and DCR, as well as from community members and organizations especially on topics of urban design, transportation and mobility, resiliency, and parks and recreation. Furthermore, we appreciate the responses by the development team to address these issues. We applaud this robust dialogue and encourage it to continue through and inform all phases of the project.

Within this broader context of support, we selectively offer comments on a few areas:

Urban Design, including Pedestrian Experience

In the September 5, 2019 Boston Globe, columnist Shirley Leung asks, "will history repeat itself and create yet another unwelcoming, high-priced office district that walls off the waterfront?" That is exactly one of the major questions facing SD right now. Can it avoid the well documented urban design and urban realm deficiencies of the Seaport?

As Tom O'Brien states, "Fan Pier from a planning and urban design perspective is a disaster. The Fan Pier buildings are too tall and close together. There is no step back from the water. The open space needs to be way more public and connected." These comments offer a lens through which we urge BPDA to examine the current SD master plan.



Per the current proposal, the proposed SD block sizes and floor plates are larger than those in the Seaport, and at a much different scale than nearby neighborhoods. This raises concern. While we wholly support this development being of the 21st century in every way, proposed block sizes, massing, and three dimensional implications of the master plan should be refined with clear comparisons to the Seaport and other precedents, additionally informed by light and shadow studies, and modified based on lessons learned.

Furthermore, the AID includes little mention of pedestrian/ground level experience. Extraordinary examples of ground level public realm environments in dense urban areas do exist throughout the world, though as the Seaport demonstrates, this is not automatic. As SD advances, we urge careful investment in the streetscape and exterior ground level spaces. This includes not only building dimensions, coverage, ground floor uses and entrances but also the finer-grain issues of transparency, rhythm, texture, materials, plantings, view corridors, pass throughs, connections, access, and more.

### Resiliency

BSLA applauds the deep investment in resiliency measures on site, especially dealing with increased stormwater flooding through nature-based strategies that provide community co-benefits. We encourage the construction of these open spaces be tied to environmental need, flood model updates, and recommendations of Climate Ready Boston analysis even if (especially if) that prioritizes the open space investments in advance of building construction.

We also echo comments that encourage resources be set aside to further advance and refine the master plan based on additional analysis of the upcoming Climate Ready Boston study of Belle Isle Marsh/Chelsea Creek areas and the Bennington Street resilience study, slated for 2020. Thank you for supporting this analysis. Belle Isle Marsh is a critical regional resource. The rehabilitated tide gate is good, but it's not enough. How can SD be a model for resilience excellence not only on-site, but also as a catalytic partner in regional improvements? BSLA encourages and applauds the development team as influential members of the larger coalition of public, private, and community partners that will be necessary to implement these regional measures.

### Parks and Recreation

BSLA is especially delighted to see this investment in open space, and the addition of 40 new acres – thank you. Again, we endorse and echo comments already made by the BPRD and BPDA. A few points to underscore: As recreation needs and active/passive ratios are evaluated at each development phase, use consideration should take into account the entire East Boston (and Revere) area, not just SD residents or immediate abutters. We endorse the call for permanently protecting all of the open spaces for public use in perpetuity. And we applaud the investment in bicycle infrastructure and networks on site as well as promised connections to the East Boston Greenway – thank you.

Suffolk Downs is an extraordinary project; we are incredibly enthusiastic about its promise and the work done to date. As O'Brien noted in the Globe, Suffolk Downs does not face the pressure that recent, less successful big projects like the Seaport did. With that in mind, we encourage you to take the time necessary to get this right.

--

**Gretchen Rabinkin**, Affiliate ASLA; AIA

Executive Director

**Boston Society of Landscape Architects**

*The Massachusetts and Maine chapter of the American Society of Landscape Architects*

Twitter @BSLAOffice

Facebook @BSLANow



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

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## Public Comment HYM-Suffolk Downs reDev

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**Gabriela Cartagena**

Fri, Nov 1, 2019 at 12:02 AM

To: tim.czerwienski@boston.gov, Joseph.Boncore@masenate.gov, Adrian.Madaro@mahouse.gov, LYDIA.EDWARDS@boston.gov, MAYOR@boston.gov, ANDREA.CAMPBELL@boston.gov, A.E.GEORGE@boston.gov, MICHAEL.F.FLAHERTY@boston.gov, ALTHEA.GARRISON@boston.gov, MICHELLE.WU@boston.gov

Tim Czerwienski,  
Project Manager  
Boston Planning and Development Agency  
One City Hall  
Boston, MA 02201  
[tim.czerwienski@boston.gov](mailto:tim.czerwienski@boston.gov)

Re: Planned Development Area No. 124, Suffolk Downs

Hello Mr. Czerwienski,

I've lived in East Boston all my life and know that this project is going to change the game for ALL of Boston and surrounding communities. Right now in East Boston, people want to move i because they love the long immigrant history, culture, and natural marsh, but what good does that too if everyone who made it like that is displaced or dead? Right now East Boston is being hit with harmful rates of emissions from passing cars, planes, public transportation, and industrial neighbors like the petroleum tanks, Eastern Minerals, Massport, and more, alongside with the lack of green spaces and lack of efforts to maintain and grow the Belle Isle Marsh. The Suffolk Downs Redevelopment needs to adhere and listen to the long term and vulnerable residents of East Boston and build on our terms.

This process has not been accessible to the common public, it isn't until now that more people are starting to know which means that this is the time to be intentional with a revamp of engagement and commenting periods.

Personally, October was the first meeting I have never been for the HYM Investment Group's Suffolk Downs redevelopment, I've been in school focusing on graduating and trying to figure out how to put numbers to the amount of forcefully displaced people in East Boston who were of vulnerable incomes. Recent bills, the Jims Brooks Act did not pass thanks to an unbelievable amount of lobbying behind the opposition. In the future HYM must support the community's efforts and community\ grassroots led lobbying to pass policy for rent control and to record eviction courts. HYM must adhere to the people.

I also want to point out how noninclusive the BPDA is of mother nature in the long run. There needs to be 100 and 200-year assessments to the effects this development is going to have on the Belle Isle Marsh along with more proactive ways to minimize all negative effects on the indigenous wildlife and the estuary which is key for the creation of sea life.

I ask that the BPDA keeps in mind these requests for the proposal of the property of Suffolk Downs:

- Must translate every document pertaining to the development of Suffolk Downs by HYM Investment Group into Spanish so is accessible to the Spanish-speaking majority in East Boston.
- Must extend the commentary period for 120 days *after* every document has been translated into Spanish.

- Must make 50% of the residential units provide 30% of Area Median Income, which is the percentage median income that accurately reflects East Boston's mostly impacted community.
- Must have a large portion of ownership for units provided for the 30%-80% of Area Median Income.
- Affordable units must include pathways to ownership.
- Affordable rental and ownership units must be open to undocumented families and individuals.
- Must build units that reflect the culture and lower-income realities of the immigrant families which has historically built and resided in East Boston. These units must include two and three-bedroom apartments for families.
- Must prioritize local businesses, minority and women-owned businesses for affordable retail spaces proposed for Suffolk Downs and Beachmont train stations, affordable should not be limited to only housing units.
- HYM must support the community's efforts and community\ grassroots led lobbying to pass policy for rent control and to record eviction courts
- Must prioritize applications of East Boston residents who lived here when the first meeting was interpreted in Spanish and used.
- Must make a small land community garden, where residents who do not have access to gardening land can actually have land, and integrate green roofs for all roofspace.
- Reintroduce heavy lots of indigenous plants throughout the whole development to protect the Belle Isle Marsh, use of nature will decrease marsh destruction which is inevitable with construction.
- Must clarify in detail to the community the types of agreements and partnerships HYM Investment Group has made and will make with any other agency that will impact the development and building of the Suffolk Downs project.
- Must comply with the City of Boston's 2019 Climate Action Plan, and in compliance with maintaining and supporting the Belle Isle Marsh, which is a very important ecosystem that is now in danger of long term damage because of this very project.
- Must reduce the impact of gentrification and displacement of people and native species from the Salt Marsh.
- Must plant 2000 trees\ plants throughout East Boston and Revere as reparations to damage to the natural form of the land, a form of land tax.
- Must recognize that a project of this size can house rehabilitation of the most vulnerable members of East Boston experiencing opioid addiction knowing that it is close to public transit, and work with local community organizations like North Suffolk Mental Health Center and the East Boston Community Health Center to further provide services.
- Must mitigate homelessness by working closely with existing grassroots like the East Boston Community Soup Kitchen, learn of other possible ways of supporting the homeless in East Boston, and commit to regular financial support through potential permanent space, and food donations.

To conclude, as a close neighbor of Suffolk Downs I currently oppose HYM Investment Group's current form of the proposal. The previous requests are a step to making this project realistically not as detrimental to those who will be most disproportionately impacted by this development, the ocean, the marsh, my family, my neighbors, public transit, the land, and more.

Sincerely,

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Gabriela Cartagena

[165 Saratoga st.](#)



Thursday, October 31<sup>st</sup>, 2019

*Via Email*

Tim Czerwienski,  
Project Manager  
Boston Planning and Development Agency  
One City Hall  
Boston, MA 02201  
tim.czerwienski@boston.gov

Re: Planned Development Area No. 124, Suffolk Downs

Dear Mr. Czerwienski,

I want to thank you for providing the chance to comment on this development regarding the property of Suffolk Downs, and for extending the timeframe for the comment period.

I have been a resident of East Boston for over sixteen years, and a neighbor of Suffolk Downs for thirteen years. Throughout this time I have witnessed the rapid changes my neighborhood and community have been experiencing since the various developments have been proposed and finished for the last five years.

In the past few years, I have observed how the new proposed developments have blocked longtime East Boston's residents' views of the shore. These same developments have led to an increase in rents forcing longtime residents to move out, while those who have been able to stay have done so by transitioning to live in cramped spaces in order to be able to avoid homelessness, and avoid moving out of the state. I have also watched how the riders that use the blue line to get to East Boston have been changing, and new types of businesses have been opening while established businesses of the East Boston community have been closing. During these struggling times of Greater Boston's housing crisis and gentrification, my family has also been impacted.

Due to being close to experiencing foreclosure in my home of thirteen years, my family had to take multiple steps in making sure we did not become homeless. Since the high-end developments are required by Boston to provide thirteen percent of their units to be "affordable", I am knowledgeable of how competitive the lottery-driven process of obtaining such units is, this process should become easier and interpreted into various languages like Spanish, Brazilian Portuguese and Vietnamese for the many immigrant communities in Boston. I am grateful to say, we have been able to stay in what has been our home for over a decade, which has made us a neighbor to Suffolk Downs.

As a neighbor to Suffolk Downs, I can always hear the train tracks, Massachusetts Bay Transportation Authority's announcements, the music from local festivals that have taken place in the old horse track, I even remember hearing the crowd noises before the horse races had stopped in Suffolk Downs. Since I am an active member of the community, I have witnessed the



growth in high-end apartments in the Maverick Square area, and I kept wondering how long it will take for the developing projects to come over to the area of East Boston called Orient Heights, which is where I live. When I heard that Suffolk Downs would close, I was sympathetic to the horse racing community since Massachusetts' last horse racing track was closing. Later when I first heard of HYM Investment Group's proposal for the property, I became concerned about its impacts on my neighborhood, my neighbors, my East Boston community, and my family.

In its current state, the Suffolk Downs proposal concerns me because it reminds me of the unwelcoming space Assembly Square in Somerville can be for someone like me. I am unable to afford any of the residential units, and the chain stores and high-end restaurants are also difficult to access financially.

Through my connections, I have been able to meet with other community members who have been active as long as I have been living here, and have been informed of other possible concerns incorporating the Suffolk Downs proposal and area in which the property exists.

After attending a community meeting for the first time related to HYM Investment Group's Suffolk Downs redevelopment in early October, I realized how out of the loop I was and confused due to lack of developing-language knowledge, and other concerns came up.

I ask that the Boston Planning and Development Agency keeps in mind these requests for the proposal of the property of Suffolk Downs:

- Must translate every document pertaining to the development of Suffolk Downs by HYM Investment Group into Spanish so it is accessible to the Spanish-speaking majority in East Boston.
- Must extend the commentary period for 120 days *after* every document has been translated into Spanish.
- Must make 50% of the residential units provide 30% of Area Median Income, which is the percentage median income that accurately reflects East Boston's most impacted community.
- Must build units that reflect the culture and lower income realities of the immigrant families, which have historically built and resided in East Boston. These units must include two and three bedroom apartments for families.
- Must prioritize local businesses, minority and women-owned businesses for affordable retail spaces proposed for Suffolk Downs and Beachmont train stations, affordable should not be limited to only housing units.
- Must make a small land community garden, where residents who do not have access to gardening land can actually have land, and integrate green roofs for all roofspace.

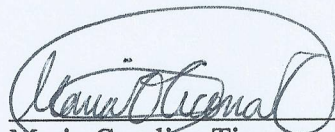


- Must clarify in detail to the community the types of agreements and partnerships HYM Investment Group has made and will make with any other agency that will impact the development and building of the Suffolk Downs project. As the agreements and partnerships arise, these documents shall be translated into Spanish so the Spanish-speaking community has access to such partnerships.
- Must comply with the City of Boston's 2019 Climate Action Plan, and in compliance with maintaining and supporting the Belle Isle Marsh, which is a very important ecosystem that is now in danger of long term damage because of this very project.
- Must reduce the impact of gentrification and displacement of people, and native species from the Salt Marsh.
- Must recognize that a project of this size can house rehabilitation of the most vulnerable members of East Boston experiencing opioid addiction knowing that it is close to public transit, and work with local community organizations like North Suffolk Mental Health Center and the East Boston Community Health Center to further provide services.
- Must mitigate homelessness by working closely with existing grassroots like the East Boston Community Soup Kitchen, learn of other possible ways of supporting the homeless in East Boston, and commit to a regular financial support through potential permanent space, and food donations.

To conclude, as a close neighbor of Suffolk Downs I currently oppose HYM Investment Group's current form of the proposal. The previous requests are a step to making this project more realistically beneficial and just to the community members mostly impacted by this development, and my family.



Sincerely,



Maria Carolina Ticona  
Suffolk Downs Neighbor  
mctc0192@gmail.com

Cc:

John Walkey, Green Roots  
Lisa Owens, City Life/ Vida Urbana  
Andres Del Castillo, City Life/ Vida Urbana  
Gloribell Mota, Neighbors United for a Better East Boston  
Jodi Sugerman-Brozan, MassCOSH  
Luz Zambrano, Center for Cooperative Development and Solidarity  
Blake Shelter, Stand for Democracy  
Lauren Sampson, Lawyers for Civil Rights  
Senator Joe Boncore  
Representative Adrian Madaro  
District City Councilor Lydia Edwards  
At-Large City Councilor Michelle Wu  
At-Large City Councilor Annissa Essaibi-George  
At-Large City Councilor Michael Flaherty  
At-Large City Councilor Althea Garrison  
Mayor Martin J. Walsh  
Lina Tramelli, East Boston City Liason



Comment: Created Date	First Name	Last Name	Organization	Zip	Opinion	Comments
10/31/2019	Chris	Marchi	Private Citizen	02128	Oppose	<p>While I appreciate the effort made to accept the responsibility of extending the East Boston Greenway to the Suffolk Downs Project site, the challenges of adding 20,000 residents to an already critically overburdened transportation and housing theater are too many -- and this Greenway extension is only one of many needed responses. With Route 1A, Sumner Tunnel, and Ted Williams Tunnel level of service exceeding capacity on 2 - 3 occasions daily, the repercussions of the state's chronic underinvestment in transit solutions to the northern approach unfolds on to East Boston residents laps-gridlocking our daily routines and clogging the arteries our families and local economy need to breathe. How long will it be before local businesses begin to die off? When will we lose our first loved one en route to urgent care? How many more children need to be saddled with respiratory disease before we drive home true transportation change? There are many areas of need. The Marsh needs protecting. We need sports fields. Small retail -and the life-changing opportunity it can provide need to dominate, for a change. Sales Creek should flow. Bus and Water transit should be improved. Air filtration and soundproofing must protect our future neighbors... If we can't figure out a way to meet our needs, we need to keep working. When will someone draw a line that shows THEMSELVES on the side of accountability? The good work of many dedicated Boston citizen stakeholders -residents who spend their time pushing aside heavy burdens to reach for a prized future Boston that meets our unequalled potential</p>

Comment: Created Date	First Name	Last Name	Organization	Zip	Opinion	Comments
						<p>should not be taken for granted. Mr. Golden, BPDA and the BPDA board should draw that difficult line, finding themselves and the good people of HYM, and Mr. Harrison, on the side of commenters such as Alex DeFronzo, of the Suffolk Downs Impact Advisory Group, Livable Streets, Greater Boston Legal Services, Friends of Belle Isle Marsh, the Allandale Foundation, City Life/Vida Urbana, Greenroots, Friends of the East Boston Greenway and Airport Impact Relief, Incorporated (AIR, Inc.). These are the comments which define who we are and where we are headed! These ideas describe a future success which builds off lessons learned at the Seaport, or in North Point. I urge you to use the considerable powers and talents of your team at BPDA to slow the Suffolk Downs planning process enough to allow the best of Boston's ideas to shine.</p>
10/31/2019	Rudi	Seitz		02128	Oppose	<p>I oppose the development of Suffolk Downs until its impacts on neighboring Belle Isle Marsh have been assessed and a mitigation plan has been finalized. Imagine Boston 2030 calls for a resilient waterfront that will be achieved through the creation of new open spaces and flood protection systems. Belle Isle Marsh already serves in those capacities. Belle Isle Marsh is Boston's last remaining salt marsh. It is more than recreational outdoor space for city residents. It is a vital storm buffer, a carbon sink, and a heat sink. To allow the degradation or loss of Belle Isle Marsh would be a direct contradiction of the Imagine Boston 2030 vision. The Suffolk Downs development has gone through a two-year impact assessment process but, remarkably, the impacts of the project on Belle Isle Marsh have not thoroughly examined. Development next to the marsh will lead to increased runoff, traffic, and pollution, all of which will put the marsh at grave risk. To allow the Suffolk Downs development to proceed without having a plan for the survival of its unique, historic, and environmentally critical neighbor would be the height of irresponsibility.</p>

Comment: Created Date	First Name	Last Name	Organization	Zip	Opinion	Comments
10/31/2019	Justin	Pasquariello	East Boston Social Centers	02128	Support	<p>Dear Tim: I write to you with gratitude for the commitment the developers at Suffolk Downs have shown to working with the community to ensure the new Suffolk Downs development builds on, and is part of, the fabric of the East Boston (and Revere) communities. We are proud to be partners working closely with the HYM Investment Group at this site. I also write to ask that the plan, and the developers at Suffolk Downs continue to focus on several community priorities as this work moves forward. First, we are thrilled to be flagship partners at Suffolk Downs. We will work closely with the HYM Investment Group to build a space, and are just in the early planning stages of figuring out the best plan for the community, the location and the Social Centers. We believe the space will include early learning programming and may include other direct programming; we also will work to ensure that space advances our work of being a catalyst for a tight-knit, joyful and thriving community; we are excited that the HYM Investment Group is excited to partner on that. They are being very generous to us, to those we serve, and to those we will serve, in enabling us to make this vision a reality. The East Boston Social Centers is a community organization with modest organizational means, impacting nearly 600 diverse community members of all ages, the majority of whom are from low-income households, on a typical day; we look forward to impacting even more people with this partnership. Second, as this work goes forward, we think several considerations are critical for our communities: * We are grateful for the HYM Investment Group's financial and</p>

Comment: Created Date	First Name	Last Name	Organization	Zip	Opinion	Comments
						<p>in-kind support for several community organizations. As a nonprofit that is part of this community fabric, we encourage them to continue to partner with this community's rich network of nonprofits--both financially and through engaging those stakeholders in important ongoing conversations and work to build a thriving and joyful new neighborhood. * We are grateful for the HYM Investment Group's work to minimize the carbon impact of this development--and encourage them to continue to seek opportunities to work toward a vision of net zero carbon development * We are grateful for the HYM Investment Group's consideration of area transportation needs and encourage them to continue to support multimodal transportation for this area * In this time of rapid gentrification and displacement, we encourage HYM and partners to foster a socioeconomically diverse community, like today's East Boston and Revere, by striving to exceed the minimum affordable housing requirement and working toward a goal of 20% affordable housing * Recognizing the ecological importance of the nearby wetlands, potential impacts of sea level rise, and the potential flood risk in this area, we encourage the developers to work closely with Friends of the Belle Isle Marsh and other environmental and residential stakeholders to protect the environment and residents. Tom O'Brien and the HYM Investment Group have been great partners for the East Boston Social Centers and other community groups. They not only have invested financially and in a shared vision, but also have been very open to our input; Tom also has given</p>
						<p>generously of his time and has been a mentor to me in many ways. We are excited to work with them to ensure that Suffolk Downs is a true neighborhood, a diverse neighborhood, a neighborhood integrated with surrounding communities, and a place ready to adapt as climate change's impacts continue to grow. Thank you for your consideration of this comment. Sincerely, J. Justin Pasquariello, Executive Director, East Boston Social Centers</p>

Comment: Created Date	First Name	Last Name	Organization	Zip	Opinion	Comments
10/31/2019	KANNAN	THIRUVENGADAM		02128	Oppose	<p>I know many of these discussions are ongoing, and there is always a chance these concerns will be addressed, but today is the comment deadline, and therefore I can only comment on the status as of today.</p> <p>1. This project puts people in harm's way. Given that there is no protection plan for the adjacent Belle Isle marsh, the marsh will be lost to sea level rise, taking with it Suffolk Downs' storm buffer, thus putting the people in Suffolk Downs on the front line of storms. But because that's in the future, it's being planned as a land-locked neighborhood. The marsh already gets flooded. On Oct 28 2019, the King High Tide filled the marsh with water all the way up to Bennington Street adjacent to the development. In Jan 2018, the water crossed Bennington into Suffolk Downs.</p> <p>2. The truth about expected flood insurance increase and how the residents will pay for it are not being told. Approving authorities and community members are making decisions without that crucial piece of information. Worse, unsuspecting buyers and tenants are/will be subject to exorbitant and potentially prohibitive flood insurance premiums. All it takes is one bad storm.</p> <p>3. The impacts of the development on the adjacent marsh have neither been documented nor their mitigation addressed. There are short term (such as impact on sensitive wild life and delicate ecosystem of large numbers of frequent visitors) and long term impacts (the marsh will be blocked from migrating inward in response to rising seas).</p> <p>4. It is not a carbon-neutral development with net zero carbon operations. It is adding significant burden to the city's carbon budget and makes the</p> <p>city's Carbon Free Boston program harder to implement.</p> <p>5. It does not have a sheltering facility -- short term or long term -- for people in the more vulnerable housing stock all around during flooding emergencies.</p> <p>6. It does not have a school.</p>

Comment: Created Date	First Name	Last Name	Organization	Zip	Opinion	Comments
10/30/2019	Sonja	Tengblad	Mothers Out Front	02128	Oppose	Suffolk Downs should serve as a continuation of East Boston. The development proposed does not reflect the current demographics of East Boston, and many are worried it will turn into "just another unplanned Seaport". Affordable housing units account for incomes as high as \$74,500 a year, far above the average individual income of \$38,000 in East Boston. HYM Investments? estimates of 1.5 people per unit in their development are lower than even the Seaport Districts 1.7 people per unit and far below the current 2.6 per unit in East Boston. We should also be at the point in history where all new developments feature net zero buildings. Buildings account for 2/3 of our city's emissions, and we have a unique opportunity in Suffolk Downs to care for future generations in this way. Thank you for your consideration.
10/30/2019	Nora	Carroll		02129	Oppose	There needs to be a clear plan for affordable housing and the developer partner with the city to ensure that a sufficient percentage of the units will be for low-income (i.e. for residents in the 40% AMI and below). This large development greatly threatens East Boston and should be seen as a great opportunity to partner with residents and non-profits to ensure that the development is made for them. Otherwise, this project will likely result in the same ending as the Seaport. A place where only high income residents can afford and the lack of a truly residential space that creates community and culture. The most innovative and exciting projects going on in other cities are those that are working to implement aggressive affordability plans and realize that by building a true community, the end result is far greater and more successful than anything else.
10/30/2019	Daniela	Foley	Winthrop Middle School	02152	Neutral	As a lifelong resident and a Science teacher, I am concerned about the impacts the development could have on the marsh given the current and increasing risks it already faces due to climate change. Please analyze the impacts and plan to protect the marsh before the development decisions are made. Thank you.
10/29/2019	Kent	Elliott		02152	Oppose	This development does not take into account protection of the critical Belle Isle Marsh, which is the last remaining original marsh in the Boston area. This marsh is a natural barrier for our coast and also critical home to endangered wildlife. I strongly oppose any development that disregards our marsh.

Comment: Created Date	First Name	Last Name	Organization	Zip	Opinion	Comments
10/23/2019	Deanna	Castano	none	02128	Oppose	<p>I think East Boston is not no where near middle class. Living here since 2015 I am struggling because rent is so expensive here. Prices are very high this is not Seaport and we don't want it to become one. I live in a room with my two kids where my mom rents. I have not been able to move out. I have applied for section 8 housing etc. The wait is very long for us who really need to move out of the room we live in. We need more affordable homes than adding 1000, its not enough. I think we should think about the pollution the environment and the lower class. The rich are only getting richer and the same goes for the poor getting poorer. A issue that makes me want to move out of East Boston besides rent are all the dangerous tanks, gasoline stations, airport near homes. If those things explode think about the negative impact it will have. People do not respect, protect public spaces, with all the garbage people throw in the floor. People not recycling because they are lazing and don't care about the planet. We need to minimize our carbon footprint. Other countries are riding their bikes for a day, instead of cars. We definitely, need to get rid of the drug addicts from the street and help the homeless and people that need their own space to live. We need to fix the issue and not make them worse. If we keep trying to separate economic classes things will only get worse. Life is not about money, its about helping everyone be happy , have basic needs and a stable job and place to live.</p>

Comment: Created Date	First Name	Last Name	Organization	Zip	Opinion	Comments
10/21/2019	John	Burkhardt	Self	02474	Oppose	This development is misguided at best. It would destroy the Belle Isle Marsh, a critical wetland and ecosystem at a time when humans are destroying ecosystems at an alarming rate. We are in a climate and ecological emergency and we can't afford to lose these vital ecosystems. A better use of the site would be to complete de-pave it and rewild the entire area back to a natural ecosystem. This is the kind of leadership that we need to demonstrate to address the climate and ecological emergency. This emergency will affect us, our children and future generations. At our current trajectory we are already risking a 5% chance of human extinction. Massachusetts has to lead the country and the world on this issue. Read the IPBES assessment: <a href="https://www.ipbes.net/global-assessment-report-biodiversity-ecosystem-services">https://www.ipbes.net/global-assessment-report-biodiversity-ecosystem-services</a> Sir Robert Watson, Chair of the IPBES said: "The health of ecosystems on which we and all other species depend is deteriorating more rapidly than ever. We are eroding the very foundations of our economies, livelihoods, food security, health and quality of life worldwide." So while this project may give developers a short term gain, and the local economy a (more minimal) gain, in the medium to long term it will be another step toward our ultimate destruction, or as one journal put it: "a globe-spanning murder suicide". To ignore these warnings and proceed with this development would be insane. To cancel the project and restore it to nature would be bold, thoughtful, cutting edge, forward looking and an inspiration to the world. I have many authoritative references to back up the science.
10/21/2019	Kai	Haskins		02130	Oppose	This important land for wildlife & a healthy ecosystem. Please protect it.
10/21/2019	Karen	Barbarisi		02128	Neutral	I am writing in defense of Belle Isle Marsh Land. A natural preserve that is loved by the community. It is a small sanctuary for city dwellers and especially for the wild life that love there. If this precious land is under consideration for development, I strongly oppose and am in favor to preserve this natural wetland



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10/18/2019	Brad	Rothrock	Brad Rothrock	02135	Neutral	As a Boston resident I understand the absolute necessity for affordable housing in our area. I would support this development IF at least half of these units are made available at 30% of the area media income. Otherwise, this development is not for people but for developers - and that's NOT what we need right now in Boston.
10/17/2019	Jackie	Golding		02128	Oppose	I strongly oppose the Suffolk Downs project. As an East Boston home owner, I already witness our city rampant with developments, rodents and traffic issues. As our climate warms and our sea levels rise it makes zero sense to me that this land wouldn't be utilized as green space, protecting our soil, providing heat island effect relief, and providing a place for water to go. Urban farming along with sustainable businesses need a place, there are monetary gains that can be had here, and would rather see something along those lines as we near crisis. Not to mention, East Boston has the least amount of trees in our city and a major air pollution problem. Let's please be smart.
10/16/2019	Nancy	Huang	Na	02128	Oppose	I oppose this project. I do not think this is what Boston needs as priority. This is a huge project that will have a big change on the area. Especially for the marsh and nature. Belle Isle Marsh was not in the climate action plan for Boston. I support planting as many trees as possible especially because this area is next to airport.

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10/16/2019	Elena	Bertkau		02128	Neutral	Overall I'm in support of the development of Suffolk Downs, but it needs to be designed to provide housing, infrastructure improvement and jobs to the current East Boston and Revere communities and currently it seems to only focus on maximizing profits. Please take into consideration and improve the project by addressing all or most of the following areas I'm concerned about: - lack of inclusivity in the proposed neighborhood there is minimal affordable /middle income family housing - lack of infrastructure development (no police station, fire station, ambulance bay, schools, commuter rail, improved blue line service) - housing mix is not reflective of the east boston and revere communities - traffic will increase along 1A and the traffic study was completed before the summer tunnel entrance toll booth removal. The traffic study stops at Day Square and ignores the congestion across Eagle hill, Maverick, central square and day square and doesn't take into account the airport expansion currently in progress - the plans for job creation through the office buildings are not well-established - a commuter rail, a ferry and/or increased blue line service will be necessary to accommodate 10,000 additional units. Currently when there is traffic on 1A and the blue line breaks down it takes over an hour and costs a cab/Uber/water taxi fare get downtown from East Boston.
10/16/2019	Joseph	Morante		02128	Oppose	I believe this construction will adversely impact, water ways, wildlife, traffic and society

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10/16/2019	KANNAN	THIRUVENGADAM		02128	Oppose	<p>I have some outstanding questions on Suffolk Downs. Perhaps they can all be answered, but before they are, I can't support the project in good conscience. - What are the impacts identified by the IAG? What is the mitigation plan for those impacts? - What is the flood insurance situation likely to be for Suffolk Downs residents and businesses (including any property management company that takes over part of the development) for the period of the life of the last building (to be built) that's part of the planned development? Is it possible that they will be required to buy flood insurance? What is the amount likely to be in the order of? Isn't it possible that residents/businesses will have to bear that cost in some indirect way even if they are renters and it is only the property owner that's required to pay flood insurance? - For those who live outside and around Suffolk Downs and are likely to face emergency situations during the 20-year development period and beyond, how can Suffolk Downs -- as a climate-resilient development -- be set up to provide short term and long term shelter? - For those who are likely to be displaced by climate change from East Boston (say a few too many nuisance floods or an unaffordable yet required flood insurance premium or a complication thereof forces people in the flood zone to move out), how can Suffolk Downs give priority so they can stick around in the neighborhood? - Suffolk Downs strikes me as a great opportunity to build 21st century climate-resilient and affordable housing to an extent significantly higher than what is currently being done. There should be a lot more passive</p>

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						<p>solar architecture given that this is a from-scratch design that can take advantage of unblocked sunlight to warm interior spaces. There should be a lot more focus on zero waste, near zero net carbon, and non-carbon modes of transportation. There should be micro-units allowing more people to find housing locally. Smaller houses lead to less energy consumption and therefore less operating costs anyway. I do not see any such forward thinking in the design of Suffolk Downs. It seems more of the same from the past with a few minor tweaks (like raising the land which seems minimal). Why is that? Does the city feel it shouldn't dictate terms to a private developer? But doesn't that approach contradict the city's zero waste, zero net carbon, and climate resiliency visions? - Can we wait on approving Suffolk Downs until the Wetlands Ordinance is passed please? That way we will have some hope of protecting Belle Isle Marsh, which in turn will protect the residents of Suffolk Downs. - I can't quite make head or tail out of the corporate orgy that McClellan Highway Development company is. Is William Bruce Harrison the 95% owner? Or is it Cathexis? How much does Tom O'Brien own? How about HYM? When the community feels the owner is talking to us, aren't we really only talking to the 1% owner? Have you been open about that with the community? Is that why he can't give answers then and there? Instead offers to sit down in the future? I am ready to sit down but this comment period doesn't really leave any room for sitting down. How can we be confident about any offers made by Tom O'Brien or HYM?</p>

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						<p>Are they presumed to be backed by Cathexis? Has HYM been authorized by McClellan Highway Development Company? Can we see evidence to that effect? How do we get the promises -- if any are made -- in written form? How can BPDA/City of Boston help with that? What format does that "Community Benefits" package take? Who is that agreement with? HYM or Cathexis or McClellan Highway Development Company? What happens if and when ownership changes? - There are several cases where due to the lack of citizen oversight, developers do not quite come through on the promised community benefits, or deliver them partially. Can we create a citizens oversight committee for Suffolk Downs, which lives for the entire period of development and beyond? (sort of like PiersPAC for Massport) It should be a stipended organization with a cross section of members including organizations that represent the disproportionately affected populations, viz. City Life/Video Urbana and Friends of Belle Isle Marsh. - Should Suffolk Downs suffer massive climate impacts that then require the city and state to help address, where does that money come from? How can McClellan Highway development company pay the city and the state towards an ongoing insurance premium of sorts that can be put towards any such need? - How much carbon emission is Suffolk Downs taking from City of Boston's carbon budget? How much waste will Suffolk Downs produce when fully developed? How much trash? How much sewage? - Should stormwater leave the Suffolk Downs premises due to an unexpected amount of extreme precipitation, where is the</p>
						<p>water likely to go? - On the updates made recently, there is nothing supporting the mayor's Resilient Harbor vision, in terms of concrete plans to help implement it. Why not? If it is not catalyzed by a humongous development like this one, when is it going to happen? - That change from number of units to square footage in terms of the metrics applied to satisfy IDP requirements, is that really a good thing? Doesn't that mean fewer families will now be accommodated in the affordable homes than before? Why isn't anything out-of-the-box or creative being attempted here? How about co-living homes with multiple bed spaces and shared living rooms/kitchens etc, for instance?</p>

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10/16/2019	Palma	Basile		02128	Oppose	I oppose such a large development being built in East Boston. As it is, traffic is very bad all day, with all cars coming in from the North Shore, this development will impact traffic it even more. The infrastructure needs to be well planned and the developer needs to show us how this is beneficial to the people of East Boston. I am a life-long resident and I think the gentrification of East Boston is a wonderful thing, but this will be dreadful for the people of East Boston! Thank you for your consideration. Pam Basile
10/16/2019	Brian	Stenson		02176	Oppose	It is an important area and adding some significant strain on local resources and coastal adjacent area. Adding another cookie cutter project doesn't seem like the best option, though admittedly probably the biggest \$\$ option.
10/16/2019	Chantha	Son	East Boston Resident	02128	Oppose	I am really opposed to the 10% of SF of retail being allocated to local businesses. This is horrible, it feels like they dont want to support local businesses or bring in diversity. It really should be 30-50%. This would help bring people to the area that are more local. Additionally, there are allot of one bedroom units across the whole design. Allot of people cannot afford one bedroom units. More emphasis should be put into 2+ Bedroom options. I think I saw that 50% of the units were one bedroom? I dont want a field of bachelors living in Eastie. There should be a bike station at Beachmont. There can be a section of the East Boston Greenway that goes through the development. it seems the one entryway at Suffolk Downs sucks. It looks like the focus is really on how to make money and make sure the roads are up to par. 2-3 slides on the intersection with 1A. What a joke! Im sure none of these people working on the project actually live in the community and all of them seem like theyre white. All the people using the Common Space is white; only white people sunbath like that. Green Fingers sound nice

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10/16/2019	Eric	Doyle	Life Long East Boston Resident	02128	Oppose	I understand that we are trying to make our community a better place, but there has to be some sort of way to control the amount of people that we are bringing here. Between all of the condo developments popping up all over the place, and the already horrific traffic, when do we say enough is enough? It should NOT take some one taking their kid across town to school an hour. It shouldn't take some one who lives up the Heights an hour to get just to the tunnel entrance, which was another terrible idea by the way.. I have lived in East Boston my whole life, born and raised down Jeffries Point, I am fearful that I soon might not be able to afford living here. These developments being put up, people asking for astronomical amounts for rent, people born and raised here are fleeing for the boonies, COME ON! I don't want to leave East Boston, and I'll be damned if I am pushed out to make room for the yuppies rolling in! I am not one of those crazies that is going to "fight the man", I kind of just go with the flow. However I am sad to see the direction this neighborhood is heading. I strongly hope it is considered to simmer down on the amount of units being built here, and I don't think its the best idea to keep cramming people into an already crammed neighborhood. Thank you for your time in reading this message...last thing is, please just think of the residents.
10/15/2019	Noemy	Rodriguez		02128	Oppose	Reciban un cordial saludo, Estoy muy preocupada por el proyecto que estan llevando a cavo; ya que soy una residente de E Boston por 7 años. Una las preocupaciones es, la construcción de Suffol-Downs el no tener mas conocimiento del proyecto, es que la ultima actualizacion fue solo en ingles, y yo solo entiendo español. La otra parte del interés que tengo; es ver como mi vecindario esta haciendo afectado por el desplazamiento, y como mis vecinos se esta moviendo por el alto costo de renta, tambien el cogestionamiento en las calles y el tráfico que hay que lidiar dia con dia. Como residente de E Boston, necesito mas informacion de este proyecto y que sea en el idioma apropiado para poder entender. Gracias.
10/14/2019	YUTI	Chan		02128	Support	Please start the project as soon as possible! We want a new neighborhood with more facilities in the area. There are very few grocery, shops, and restaurants in the area.

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10/10/2019	Stephen	Mahood		02128	Oppose	<p>As I mentioned in the last meeting on October 1st, we have a project that is not doing enough in terms of affordable housing on site and in the neighborhood. I want to point out that Tom has said he is willing, unlike, other developers to work with the community and clearly he is not listening to the key demands. I agree that 33% affordable is a more realistic number for what should be built as a bare minimum. This development is going to expedite the gentrification of the neighborhood and surrounding areas. Any delay is a benefit to us as it will give us time to sit down with Tom and settle these demands. The fact that Tom did not even adjust the plan with the new added information of William Bruce Harrison, a billionaire, is greatly disappointing. If it were not for the information that William Bruce Harrison is known to have developed projects similar to this in other cities across the country I could see why Tom and HYM have not adjusted but they have a history and the impact is detrimental to the community. A no development is better than the current plan. The BPDA as it currently stands is a weak body that is not standing up for the community and is in fact folding to the hands of the developers. Sure certain things that are met are in part cause of the BPDA but it is as body is not a healthy thing for the development projects. I agree with Counselor Wu on the need to completely remove the BPDA as it is not accountable to the community, we have not hearings to attend to voice our opinions and instead of the community having a voice we have only comments and public q&amp;a meetings. If we</p>
						<p>missed early stages, it is further proof that the BPDA does not get the information to the residents. In fact even this extension requires us to know about it by checking a site, no announcement was made, no email to the community. Please extend again, the lack of a settlement on the affordable units is necessary before the comments end as it will change. I am not worried about pissing off a land owner who thinks they have more say in the community than the existing residents. Please extend or cancel this project.</p>



Comment: Created Date	First Name	Last Name	Organization	Zip	Opinion	Comments
10/2/2019	Dottie	Donofrio	Winthrop Concern Citizen	02152	Neutral	I attended the first of many public meetings and had the opportunity to render my question: "With all the housing units being proposed ~ is the developer including a recreational facility for the neighborhood youth?" It was publicly stated by the presenter that "YES" They (the developer) did have the youth in mind along with the open area of land. A place to go after school. A place for children to gather" NO WHERE in the latest plans offered does one see/hear of said facility/building????And you wonder why with each new proposal that people become less trusting..... Dottie D.
9/18/2019	Blake	Shetler	Stand for Democracy	02128	Oppose	I appreciate that HYM now plans to give a certain amount of funds to East Boston -based nonprofits focusing on housing stabilization, and that you're taking averages of 13% affordable square units at averages of 70% AMI. However, those numbers still haven't changed. First of all, the AMI includes some of the wealthiest neighborhoods in Eastern Massachusetts while excluding some of the lower income ones, so the supposed 'are median income' doesn't even reflect the median income of East Boston. So, the AMI used should instead be the median income of East Boston, Chelsea, and Revere as those are the communities that will be most impacted by this development. Secondly, just like the demands of Boston People's Plan active on the other side of the harbor, this development (and all developments) should include 50% affordable units, based on a localized, real AMI that accurately reflects the surrounding area. Otherwise, this development will end up tearing apart the immigrant communities that currently live in East Boston in order to pave way for wealthier citizens.
9/17/2019	Elaine	alm	Self	02128	Oppose	Best of some high ranking official drives up route 1 north in the morning traffic already backed up in early mornings daily to bell circle, I can?t imagine more people commuting Down town from Suffolk downs locarion without jamming north and south bound traffic for hours maybe even all day both ways, And mbta would never sustain,....you would have to transport people by BOAT

<b>Comment: Created Date</b>	<b>First Name</b>	<b>Last Name</b>	<b>Organization</b>	<b>Zip</b>	<b>Opinion</b>	<b>Comments</b>
9/17/2019	Max	Wilensky		02128	Neutral	It was noted in the updated master plan that the East Boston Greenway extension would be completed by phase 3. This is a vital mitigation measure for the community. Connectivity with the rest of the neighborhood should be a top priority and as such, should be included in phase 1.



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

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**Suffolk Downs project.**

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sean riley [REDACTED]  
To: tim.czerwienski@boston.gov

Thu, Oct 24, 2019 at 9:38 AM

Hi Tim ,

I am concerned about the impacts the development could have on the marsh given the current and increasing risks it already faces due to climate change. Currently Bennington street and 1A floods as it is with King Tides, as Suffolk Down was formally saltmarsh, this flood plain will only get worse as sea level rise progresses. If Belle Isle marsh is not protected and the marsh buffer zone is lost, the "buffer zone" will be Suffolk Downs itself, which will be the only land between Chelsea Creek and Belle Isle estuary if Belle Isle disappears. Once the developers have finished construction, this flood plain with 10,000 units on it, will be the burden of tax payers. For this project to have any longevity, Belle Isle has to be protected. From a naturalists prospective, it is one of the most biologically important areas for wildlife in the Greater Boston area. That said, even if no one on the BPDA cares about its biological significance (I mean that respectfully, I know its not your job to look after the well being of wildlife), the reality is that it is the only thing standing in the way of that project being a Billion + dollar abandoned housing area once the ocean reclaims that section of filled in saltmarsh. A comprehensive study looking at how to preserve Belle Isle marsh as a necessary flood plain buffer. The success of the Suffolk Downs project depends on it. As a member of the scientific community , specifically working with saltmarshes, the projections for sea level rise being displayed are way off for this site. Collapse of the abutting buffer zones will take place decades before the timeline that HYM is talking about. I suggest reaching out to EPA coastal wetland biologists for guidance on the timeline.

Thanks for reading.

- Sean



Tim Czerwienski <tim.czerwienski@boston.gov>

## Comments on Suffolk Downs

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

Wed, Oct 16, 2019 at 12:45 AM

Hi Tim,

I have some outstanding questions on Suffolk Downs. Perhaps they can all be answered, but before they are, I can't support the project in good conscience.

- What are the impacts identified by the IAG? What is the mitigation plan for those impacts?
- What is the flood insurance situation likely to be for Suffolk Downs residents and businesses (including any property management company that takes over part of the development) for the period of the life of the last building (to be built) that's part of the planned development? Is it possible that they will be required to buy flood insurance? What is the amount likely to be in the order of? Isn't it possible that residents/businesses will have to bear that cost in some indirect way even if they are renters and it is only the property owner that's required to pay flood insurance?
- For those who live outside and around Suffolk Downs and are likely to face emergency situations during the 20-year development period and beyond, how can Suffolk Downs -- as a climate-resilient development -- be set up to provide short term and long term shelter?
- For those who are likely to be displaced by climate change from East Boston (say a few too many nuisance floods or an unaffordable yet required flood insurance premium or a complication thereof forces people in the flood zone to move out), how can Suffolk Downs give priority so they can stick around in the neighborhood?
- Suffolk Downs strikes me as a great opportunity to build 21st century climate-resilient and affordable housing to an extent significantly higher than what is currently being done. There should be a lot more passive solar architecture given that this is a from-scratch design that can take advantage of unblocked sunlight to warm interior spaces. There should be a lot more focus on zero waste, near zero net carbon, and non-carbon modes of transportation. There should be micro-units allowing more people to find housing locally. Smaller houses lead to less energy consumption and therefore less operating costs anyway. I do not see any such forward thinking in the design of Suffolk Downs. It seems more of the same from the past with a few minor tweaks (like raising the land which seems minimal). Why is that? Does the city feel it shouldn't dictate terms to a private developer? But doesn't that approach contradict the city's zero waste, zero net carbon, and climate resiliency visions?
- Can we wait on approving Suffolk Downs until the Wetlands Ordinance is passed please? That way we will have some hope of protecting Belle Isle Marsh, which in turn will protect the residents of Suffolk Downs.
- I can't quite make head or tail out of the corporate orgy that McClellan Highway Development company is. Is William Bruce Harrison the 95% owner? Or is it Cathexis? How much does Tom O'Brien own? How about HYM? When the community feels the owner is talking to us, aren't we really only talking to the 1% owner? Have you been open about that with the community? Is that why he can't give answers then and there? Instead offers to sit down in the future? I am ready to sit down but this comment period doesn't really leave any room for sitting down. How can we be confident about any offers made by Tom O'Brien or HYM? Are they presumed to be backed by Cathexis? Has HYM been authorized by McClellan Highway Development Company? Can we see evidence to that effect? How do we get the promises -- if any are made -- in written form? How can BPDA/City of Boston help with that? What format does that "Community Benefits" package take? Who is that agreement with? HYM or Cathexis or McClellan Highway Development Company? What happens if and when ownership changes?
- There are several cases where due to the lack of citizen oversight, developers do not quite come through on the promised community benefits, or deliver them partially. Can we create a citizens oversight committee for Suffolk Downs, which lives for the entire period of development and beyond? (sort of like PiersPAC for Massport) It should be a stipended organization with a cross section of members including organizations that represent the disproportionately affected populations, viz. City Life/Video Urbana and Friends of Belle Isle Marsh.
- Should Suffolk Downs suffer massive climate impacts that then require the city and state to help address, where does that money come from? How can McClellan Highway development company pay the city and the state towards an ongoing insurance premium of sorts that can be put towards any such need?
- How much carbon emission is Suffolk Downs taking from City of Boston's carbon budget?
- How much waste will Suffolk Downs produce when fully developed? How much trash? How much sewage?
- Should stormwater leave the Suffolk Downs premises due to an unexpected amount of extreme precipitation, where is the water likely to go?
- On the updates, there is nothing supporting the mayor's Resilient Harbor vision, in terms of concrete plans to help implement it. Why not? If it is not catalyzed by a humongous development like this one, when is it going to happen?

11/5/2019

City of Boston Mail - Comments on Suffolk Downs

- That change from number of units to square footage in terms of the metrics applied to satisfy IDP requirements, is that really a good thing? Doesn't that mean fewer families will now be accommodated in the affordable homes than before? Why isn't anything out-of-the-box or creative being attempted here? How about co-living homes with multiple bed spaces and shared living rooms/kitchens etc, for instance?

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