

**BOSTON REDEVELOPMENT AUTHORITY  
D/B/A BOSTON PLANNING & DEVELOPMENT AGENCY**

**SCOPING DETERMINATION  
SUFFOLK DOWNS**

**SUBMISSION REQUIREMENTS  
FOR DRAFT PROJECT IMPACT REPORT (“DPIR”)**

**PROPOSED PROJECT:** SUFFOLK DOWNS

**PROJECT SITE:** 109 ACRE SITE BOUNDED BY THE CITY OF REVERE, THE MBTA BLUE LINE RIGHT OF WAY, THE ORIENT HEIGHTS NEIGHBORHOOD, AND MASSACHUSETTS ROUTE 1A, EAST BOSTON

**PROPONENT:** THE MCCLELLAN HIGHWAY DEVELOPMENT COMPANY, LLC C/O THE HYM INVESTMENT GROUP, LLC

**DATE:** FEBRUARY 21, 2018

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The Boston Redevelopment Authority (“BRA”), d/b/a the Boston Planning & Development Agency (“BPDA”) is issuing this Scoping Determination pursuant to Section 80B-5 of the Boston Zoning Code (“Code”), in response to a Project Notification Form (“PNF”), which the McClellan Highway Development Company, LLC c/o the HYM Investment Group, LLC (the “Proponent”) filed on December 5, 2017 for the proposed 776 Summer Street project (the “Proposed Project”). Notice of the receipt by the BPDA of the PNF was published in the Boston Herald on December 5, 2017, which initiated a public comment period with a closing date of January 19, 2018. Pursuant to Section 80A-2 of the Code, the PNF was sent to the City’s public agencies/departments and elected officials on December 6, 2017. Hard copies of the PNF were also sent to all of the Impact Advisory Group (“IAG”) members. The initial public comment period was subsequently extended until February 2, 2018, through mutual consent between the BPDA and the Proponent to allow more time for the general public to provide comments and feedback.

On November 8, 2017, the Proponent filed a Letter of Intent (“LOI”) in accordance with the Mayor’s Executive Order Regarding Provision of Mitigation by Development Projects in Boston for the redevelopment of Suffolk Downs at 525 McClellan Highway in the East Boston neighborhood of Boston.

On November 9<sup>th</sup>, 2017, IAG nomination requests were sent to Senator Boncore, Representative Madaro, and Councilor LaMattina. Letters were also sent to the at-large City Councilors and the Mayor's Office of Neighborhood Services. The letters sought nominations or recommendations to the IAG by November 16<sup>th</sup>, 2017. Each office responded with two nominees apiece within one week of the nomination requests being sent out. The BPDA Planning Department recommended two individuals, for a total of 15 nominations.

The following is a list of the IAG members:

Joe Arangio  
Erica Capogreco  
Eleanor Catino  
Debra Cave  
Ernani DeAraujo  
Alex DeFronzo  
Ben Downing  
Margaret Farmer  
Meg Grady  
Ann Margaret Gutierrez  
Roberta Marchi  
Joe Mario  
Kathy Orlando  
Claudia Sierra  
Madeleine Steczynski

The BPDA appreciates the efforts of the IAG and the members should be applauded for their commitment to the review of the Proposed Project.

Pursuant to Section 80B5.3 of the Code, a Scoping Session was held on December 11, 2017 with the City of Boston's public agencies/departments at which time the Proposed Project was reviewed and discussed. IAG members were also invited to attend the Scoping Session.

BPDA-sponsored publicly advertised meetings were conducted on December 19, 2017 and January 30, 2018 in the Clubhouse building at Suffolk Downs. IAG meetings were held on December 13, 2017; January 3, 2018; January 10, 2018; and January 24, 2018, all in the Clubhouse building at Suffolk Downs

Included in the Scoping Determination are written comments that were received by the BPDA in response to the PNF, from BPDA staff, public agencies/departments, elected officials, the general public, and IAG members. All of which are included in **Appendices A, B, and C and must be answered in their entirety.**

**Appendix A** includes written comments from BPDA staff, public agencies/departments, and elected officials.

Specifically, they are:

- BPDA Planning and Urban Design departments
- BPDA Climate Change and Environmental Planning Department
- Boston Transportation Department and BPDA Transportation and Infrastructure Planning Department
- Tim Davis, BPDA Housing Policy Manager
- Carrie Marsh: Boston Parks and Recreation Department
- John P. Sullivan: Boston Water and Sewer Commission
- State Senator Joseph A. Boncore, State Representative Adrian Madaro, and City Councilor Lydia Edwards

Public comments received by the BPDA during the comment period are included in **Appendix B**.

Impact Advisory Group (“IAG”) member comments received by the BPDA during the comment period are included in **Appendix C**.

The Scoping Determination requests information that the BPDA requires for its review of the Proposed Project in connection with Article 80 of the Code, Development Review and Approval, and other applicable sections of the Code.

In addition to the specific submission requirements outlined in the sections below, the following points are highlighted for additional emphasis and consideration:

- Throughout this initial phase of review, and prior to it, the Proponent has taken steps to meet with many community members and groups, elected officials, abutters, and various City agencies/departments. Regular conversations and meetings with all interested parties must continue through the duration of the public review process, ensuring that what is presented in the DPIR and any future filings is beneficial to the respective neighborhood and the City of Boston as a whole.
- Greater outreach to the various Latinx communities in East Boston is crucial as the review of the Proposed Project continues. The BPDA looks forward to working with the Proponent, East Boston’s elected officials, the Mayor’s Office of Neighborhood Services, and neighborhood leaders to develop strategies that ensure these communities are involved in reviewing and shaping the Proposed Project.

- Given the importance of engaging Spanish-speaking residents who may be impacted by the Proposed Project, the Proponent should provide executive summaries of the DPIR and each relevant chapter in Spanish. The Proponent should consult with the BPDA about the specific format and content of these summaries.
- Much of the discussion of the Proposed Project has been animated by the City of Boston's response to Amazon's Request for Proposals for a potential second headquarters, which positioned the Project Site as a preferred location. Amazon has generated a great deal of interest, excitement, and concern, but the nature and timeline of Amazon's decision-making process is outside the scope of this review. The BPDA encourages the Proponent to continue to be open and transparent about Amazon's role in the Proposed Project, but to maintain its focus on the physical design, impacts, and programming of the Proposed Project.
- The PNF outlined two broad land use alternatives: one that leaned toward more office space in the event of Amazon choosing to locate on the Project Site, and one that leaned toward more residential space in the event of Amazon locating elsewhere. The latter alternative still contains a significant amount of office and commercial space. The Proponent should discuss its vision for filling that space, either with another single large tenant, or multiple smaller tenants.
- The DPIR should include the most up-to-date information on the status of review and approvals in the City of Revere, as well as the Proponent's collaboration and reviews with state agencies, including the Massachusetts Department of Transportation, the Massachusetts Environmental Protection Act Office, the Department of Conservation and Recreation, and others. Throughout the review process for the DPIR, the BPDA encourages the Proponent to keep the City of Boston and the community apprised of those reviews.
- Housing affordability and the effect of the Proposed Project on prices in East Boston have been subjects of interest and concern during the initial review process. The BPDA encourages the Proponent to provide a range of rental and homeownership opportunities, including income-restricted units of both types. See the letter from Tim Davis, the BPDA Housing Policy Manager, in Appendix A for more on housing affordability strategy.
- The Proposed Project enjoys good access to two MBTA Blue Line stations at Suffolk Downs and Beachmont. However, concerns remain about the limited vehicular access to the site and the existing congestion on Route 1A. The Proponent should work to limit single occupancy vehicle trips and encourage alternative modes of transportation, including transit, biking, and walking. The memo from the Boston Transportation Department and the BPDA Infrastructure and Transportation



Planning Department in Appendix A includes more on additional transportation studies and interventions.

- The Project Site, lying between Chelsea Creek and Belle Isle Marsh, is very vulnerable to the impacts of climate change. The PNF includes some initial measures to protect the Proposed Project from those impacts. The BPDA encourages the Proponent to continue to work with the BPDA, the City of Boston Environment Department, and the Commonwealth to develop resiliency strategies that protect the Project Site as well as the surrounding neighborhood. The memo from the BPDA Environmental and Climate Change Planning Department in Appendix A includes more on additional studies and analysis.
- The size of the Proposed Project and the degree of change envisioned on the Suffolk Downs site generated both excitement and confusion during the initial review process. While the Proponent's response to this Scoping Determination will naturally contain more detailed information than the PNF, it is important to ground the public's understanding of the project in concrete and contextual terms. Many commenters, including members of the IAG, requested a physical model of the proposal to help them understand the various elements of the project in relation to each other and to the surrounding neighborhood. The memo from the BPDA Planning and Urban Design departments in Appendix A includes detailed requests for drawings, diagrams, renderings, and models.
- The Proposed Project shares a major border with the existing Orient Heights neighborhood. The impact of the Proposed Project on this predominantly one- and two-family neighborhood was of particular concern during the initial phase of review. Special care should be taken in considering this edge condition. The Proponent should evaluate topography, land use, building massing, and design to create as harmonious a transition between the new and existing neighborhoods as possible.
- The nature of the Proposed Project's retail strategy was a subject of great interest during the initial review process. Commenters and members of the IAG expressed a desire for neighborhood-scale retail, opportunities for local businesses to rent space, and incubator space for small business startups. The Proponent should be prepared to discuss its strategies for attracting neighborhood-serving retail and fostering small local businesses.
- The Proposed Project includes a 40-acre open space network that has the promise to provide many benefits to East Boston and the entire city. The Proponent must work with the Boston Parks and Recreation Department ("BPRD") and BPDA to address how the Proposed Project's open space network connects to and complements the existing open spaces in the neighborhood, as well as the

Proposed Project's impacts on existing open space. In addition to working with BPRD, the BPDA encourages the Proponent to continue to engage the IAG and community to determine what types of new public open space best address the needs and goals of the community.

- Members of the public highlighted the importance of neighborhood-defining civic facilities during the initial review process. While the Proposed Project has an ambitious open space strategy that should be a great asset to the project and the neighborhood, more clarity on proposed civic and cultural spaces—schools, libraries, community centers, performance spaces—is necessary in the DPIR.
- The BPDA encourages the Proponent to work with the Boston Police Department (“BPD”) and Boston Fire Department (“BFD”) to review and address the impacts that this proposal will have on the existing capacity of these departments’ facilities and staff, should a project move forward.
- The Proponent must work with the Boston Transportation Department (“BTD”) to address concerns regarding site access, circulation of traffic in and around the Proposed Project site, potential traffic impacts, and appropriate mitigation throughout East Boston.
- All development projects have construction impacts. As with any urban development, there needs to be a balance of construction related inconveniences with the daily activities that will continue to occur adjacent to the Proposed Project site. A detailed approach to the construction management must be included in the DPIR, including strategies for construction management over the Proposed Project’s multiple phases and community involvement in developing construction management plans.
- The Proponent must take into account all BPDA approved and under review proposals in the East Boston neighborhoods, scheduled infrastructure improvements in the general area, and nearby large scale developments in the City of Boston while conducting the DPIR’s required studies (transportation, infrastructure, open space, etc.).
- The Proponent must clearly describe the overall demolition and phasing of the Proposed Project. The buildings to be demolished and constructed in each phase of the Proposed Project should be specified along with an anticipated timeline for each phase. The BPDA acknowledges that project timelines are subject to change due to market conditions and other factors.

## **I. PROJECT SITE**

The site of the Proposed Project is an approximately 161 acre site, approximately 109 acres of which is in East Boston, bounded by the City of Revere to the north; the MBTA Blue Line tracks to the east; the Orient Heights neighborhood to the south; and Massachusetts Route 1A and an oil tank farm to the west (the "Project Site"). The site currently houses the former Suffolk Downs racetrack, consisting of several buildings of various ages.

## **II. PROJECT DESCRIPTION**

The Proposed Project, as described in the PNF, consists of approximately 11 million square feet of development in East Boston, including up to 5.3 million square feet of commercial office space, up to 5 million square feet of residential space, up to 350,000 square feet of retail space, and up to 350,000 square feet of hotel space in a new mixed-use district. The Proposed Project will also include 40 acres of publicly accessible open space which will incorporate existing wetland features.

## **III. PREAMBLE**

The Proposed Project is being reviewed pursuant to Article 80, Development Review and Approval, which sets forth a comprehensive procedure for project review of the following components: transportation, environmental protection, urban design, historic resources, infrastructure systems, site plan, tidelands, and Development Impact Project applicability. The Proponent is required to prepare and submit to the BPDA a Draft Project Impact Report ("DPIR") that meets the requirements of the Scoping Determination by detailing the Proposed Project's impacts and proposed measures to mitigate, limit or minimize such impacts. The DPIR shall contain the information necessary to meet the specifications of Section 80B-3 (Scope of Large Project Review; Content of Reports) and Section 80B-4 (Standards for Large Project Review Approval), as required by the Scoping Determination. After submitting the DPIR, the Proponent shall publish notice of such submittal as required by Section 80A-2. Pursuant to Section 80B-4(c) (i) (3), the BPDA shall issue a written Preliminary Adequacy Determination ("PAD") within ninety (90) days. Public comments, including the comments of public agencies, shall be transmitted in writing to the BPDA no later than fifteen (15) days prior to the date by which the BPDA must issue its PAD. The PAD shall indicate the additional steps, if any, necessary for the Proponent to satisfy the requirements of the Scoping Determination. If the BPDA determines that the DPIR adequately describes the Proposed Project's impacts and, if appropriate, propose measures to mitigate, limit or minimize such impacts, the PAD will announce such a determination and that the requirements of further review are waived pursuant to Section 80B-5.4(c) (iv). Section 80B-6 requires the Director of the BPDA to issue a Certification of Compliance indicating the successful completion of the Article 80 development review requirements before the Commissioner of Inspectional Services can issue any building permit for the Proposed Project.

## IV. REVIEW/SUBMISSION REQUIREMENTS

In addition to full-size scale drawings, ten (10) copies of a bound booklet and an electronic copy (PDF format) containing all submission materials reduced to size 8-1/2" x 11", except where otherwise specified, are required. The booklet should be printed on both sides of the page. Bound booklets should be mailed directly to all of the IAG members. A copy of this Scoping Determination should be included in the booklet for reference. The electronic copy should be submitted to the BPDA via the following website:  
<https://attachments.bostonredevelopmentauthority.org/>

### A. General Information

1. Applicant/Proponent Information
  - a. Development Team
    - (1) Names
      - (a) Proponent (including description of development entity and type of corporation, and the principals thereof)
      - (b) Attorney
      - (c) Project consultants and architect(s)
    - (2) Business address, telephone number, FAX number and e-mail, where available for each
    - (3) Designated contact person for each
  - b. Legal Information
    - (1) Legal judgements or actions pending concerning the Proposed Project
    - (2) History of tax arrears on property owned in Boston by Applicant
    - (3) Evidence of site control over project area, including current ownership and purchase options, if any, for all parcels in the Proposed Project, all restrictive covenants and contractual restrictions affecting the Proponent's right or ability to accomplish the Proposed Project, and the nature of the agreements for securing parcels not owned by the Applicant.
    - (4) Nature and extent of any and all public easements into, through, or surrounding the site.
2. Project Area

- a. An area map identifying the location of the Proposed Project
  - b. Description of metes and bounds of project area or certified survey of the project area.
  - c. Current zoning
3. Project Description and Alternatives
- a. The DPIR shall contain a full description of the Proposed Project and its components, including its size, physical characteristics, development schedule, costs, and proposed uses. This description should include a breakdown of components within the City of Boston. This section of the DPIR shall also present analysis of the development context of the Proposed Project. Appropriate site and building plans to clearly illustrate the Proposed Project shall be required.
  - b. A description of alternatives to the Proposed Project that were considered shall be presented and primary differences among the alternatives, particularly as they may affect environmental and traffic/transportation conditions, shall be discussed.
4. Public Benefits
- a. Anticipated employment levels including the following:
    - (1) Estimated number of construction jobs
    - (2) Estimated number of permanent jobs
  - b. Current and/or future activities and programs which benefit the host neighborhood, adjacent neighborhoods of Boston and the city at large, such as; child care programs, scholarships, internships, elderly services, education and job training programs, public realm/infrastructure improvements, grant programs, etc.
  - c. Other public benefits, if any, to be provided.
5. Community Process
- a. A list of meetings held and proposed with interested parties, including public agencies, abutters, elected officials, businesses, and community groups.
  - b. Names and addresses of project area owners, abutters, and any community or business groups which, in the opinion of the applicant, may be substantially interested in or affected by the Proposed Project.

## **B. REGULATORY CONTROLS AND PERMITS**

An updated listing of all anticipated permits or approvals required from other municipal, state or federal agencies, including a proposed application schedule shall be included in the DPIR.

A statement on the applicability of the Massachusetts Environmental Policy Act (“MEPA”) should be provided. If the Proposed Project is subject to MEPA, all required documentation should be provided to the BPDA, including, but not limited to, a copy of the Environmental Notification Form, decisions of the Secretary of Environmental Affairs, and the proposed schedule for coordination with BPDA procedures.

### **C. TRANSPORTATION COMPONENT**

In addition to the information required to meet the specifications of Section 80B-3 and Section 80B-4 of the Code, the Proponent must also refer to the BTM “Transportation Access Plan Guidelines” in preparing its studies.

The Proponent must address the comments outlined by the Boston Transportation Department and BPDA’s Infrastructure and Transportation Planning Department, included in **Appendix A**.

Proposed transportation network and infrastructure improvements/mitigation in the impacted area should also be listed and explained in this component.

### **D. ENVIRONMENTAL PROTECTION COMPONENT**

The DPIR must address the comments of the BPDA Climate Change and Environmental Planning Department, included in **Appendix A** and must include the most up to date documents required by the Article 37/ Interagency Green Building Committee (“IGBC”).

The DPIR should include the most up to date Article 37 Interagency Green Building Committee (“IGBC”) documentation.

### **E. URBAN DESIGN COMPONENT**

In addition to the information required to meet the specifications of Section 80B-3 and Section 80B-4 of the Code, the Proponent must address the comments outlined by the BPDA’s Planning and Urban Design departments, included in **Appendix A**.

### **F. INFRASTRUCTURE SYSTEMS COMPONENT**

An infrastructure impact analysis must be performed. The Proponent should continue to work with the City of Boston Public Works Department (“PWD”), Boston Water and Sewer Commission (“BWSC”), and the Boston Groundwater Trust (“BGWT”) (if applicable) on infrastructure impacts.

The standard scope for infrastructure analysis is outlined in the comment letter submitted by John P. Sullivan, Chief Engineer and Operations Officer, BWSC, submitted to the BPDA on January 4, 2018, included in **Appendix A**.

Any proposed or anticipated infrastructure improvements/mitigation in and around the Project Site should also be listed and explained in this component.

#### **G. PUBLIC NOTICE**

The Proponent will be responsible for preparing and publishing in one or more newspapers of general circulation in the City of Boston a public notice of the submission of the DPIR to the BPDA as required by Section 80A-2. This notice shall be published within five (5) days of the receipt of the DPIR by the BPDA. Therefore, public comments shall be transmitted to the BPDA within seventy five (75) days of the publication of the notice. A draft of the public notice must be submitted to the BPDA for review prior to publication. A sample of the public notice is attached as **Appendix D**.

Following publication of the public notice, the Proponent shall submit to the BPDA a copy of the published notice together with the date of publication.

#### **H. INCLUSIONARY DEVELOPMENT POLICY/AFFORDABLE HOUSING COMPONENT**

The Proposed Project must comply with the Mayor’s Executive Order regarding the Inclusionary Development Policy (“IDP”) executed on December 10, 2015 (“IDP”). The DPIR should include the approximate number of IDP or income restricted units to be created, the incomes of the households, and the anticipated unit mix.

#### **I. ACCESSIBILITY CHECKLIST**

As part of the DPIR, the Proponent must include an up to date and completed Article 80 Accessibility Checklist for the Proposed Project. An Accessibility Checklist is attached as **Appendix E**.

#### **J. BROADBAND READY BUILDINGS QUESTIONNAIRE**

As part of the DPIR, the Proponent must include a completed Article 80 Broadband Ready Buildings Questionnaire, attached as **Appendix F**. The information that is shared through the Broadband Ready Buildings Questionnaire will help the BPDA and the City understand

how developers currently integrate telecommunications planning in their work and how this integration can be most responsive to a changing technological landscape.



**APPENDIX A**

COMMENTS FROM BPDA STAFF, PUBLIC AGENCIES/DEPARTMENTS AND ELECTED OFFICIALS

## MEMORANDUM

**TO:** Tim Czerwienski, Project Manager  
**FROM:** Richard McGuinness, Deputy Director for Climate Change and Environmental Planning  
Kristina Ricco, Senior Planner  
Corey Zehngebot, Senior Urban Designer and Architect  
Jill Zick, Landscape Architect  
**DATE:** February 21, 2018  
**SUBJECT:** Suffolk Downs Redevelopment - **Planning and Urban Design Comments**

### **Master Plan Framework**

The BPDA recognizes the incredible opportunity the redevelopment of Suffolk Downs represents for the City of Boston, and looks forward to working with the Proponent on the next iteration of the Master Plan. The general strategy of creating a vibrant, mixed-use, publicly-accessible neighborhood anchored by a large open space is one that we wholly embrace as a foundational concept. Though the submission in the Expanded Project Notification Form establishes an initial framework for discussion, we anticipate that a greater degree of refinement and specificity will emerge in the months to come. Both the EPNF and conversations with the Proponent inform the following BPDA comments.

### **Planning Overview**

Formal planning for the Project Site has been limited given its unique history as a single, privately-owned parcel. Built on 161 acres of filled tidal wetlands, the site was formerly home to Suffolk Downs, a thoroughbred racetrack which operated from 1935 to 2014. The year before operations closed, a proposal for a destination resort casino was abandoned when, in 2014, the Massachusetts Gaming Commission awarded the only Boston-area casino license to a resort casino in Everett. After prospects for a casino development dissolved, the Boston Society of Architects hosted an Urban Design workshop focused on the unique opportunity presented by the city's largest development parcel.

Imagine Boston 2030 identified the Project Site (referred to as Suffolk Downs) as one of five important opportunity areas to grow our city by "expanding neighborhoods." The document defines expanded neighborhoods as those which exist at the edges of established neighborhood fabric and offer the opportunity to create new and substantial capacity for housing and job growth. Current zoning for the Project Site (Suffolk Downs Economic Development Area) would be inadequate for both the intensity and type of uses prioritized in Imagine Boston 2030.

In addition to the Imagine Boston 2030 community process, preceding this filing, the BPDA, in partnership with other city agencies, conducted a series of community open houses

during the fall of 2017, on November 15, 18, and 28. These public discussions focused on asking participants about their priorities around creating a diverse and inclusive neighborhood. Topics included housing which meets the needs of a variety of household types, vibrant and active ground floor uses including local retail and civic and cultural amenities, public infrastructure and both passive and active open space. Below are key goals from Imagine Boston 2030 along with specific comments heard from stakeholders from the BPDA open houses.

### **Encourage Housing Growth**

The Project should strive to create a diverse and inclusive neighborhood, with housing that meets the needs of a variety of household types. Participants in public meetings were interested in a mix of housing which supports this idea, and many participants identified the housing needs of families and the 55+ community as important priorities. Residents expressed concern for affordability across all housing products. By way of context, approximately 15% of East Boston's housing is income restricted and 19% of Boston's housing is income restricted. Please elaborate on the strategy for producing affordable housing. See the Housing memo for more.

### **Encourage Job Growth**

Please outline strategies for attracting / incorporating local businesses.

### **Support Industrial Uses**

The Project identifies Office uses designed for "21st Century Industrial" uses. Please elaborate on the concept of "21st Century Industrial" uses.

### **Prepare for Climate Change**

At public meetings, participants wanted to know more about the potential impact of climate change. As referenced in the Suffolk Downs Redevelopment Expanded Project Notification Form (EPNF), the Proposal contemplates raising substantial portions of the Project Site to provide protection against potential impacts of sea level rise. Please prepare a hydrological analysis of existing conditions and proposed build out. See the Environmental and Climate Change memo's discussion of "Climate Change." See Environment and Resilience memo for more.

### **Improve Transportation Connections**

At public meetings, participants emphasized the need for Transit Oriented Development which would prioritize public transportation and bicycle / pedestrian access. Concern for increased traffic to the neighborhood produced calls for reduced parking ratios where

appropriate, and an internal shuttle which might service the site while connecting to points beyond. See the Transportation and Infrastructure memo for more.

## **Invest in Public Realm and Open Space**

### *Open Space*

The BPDA is very encouraged by the generous open space provided in the project plan. This acreage will benefit those who work and live in and around the project area and will provide positive environmental benefits including stormwater control and containment, and reducing heat island effect. We ask the proponent to consider a framework of open space which would support a mix of passive and active uses.

Considering all open space is privately owned, please identify open spaces which are intended as publicly accessible versus spaces which would operate with some restriction. Please identify strategies to permanently protect the “public” status of the open space, in whole or in part. See the Boston Parks and Recreation Department memo for more on open space and parks.

### *Open Space and Active Uses*

New residents and employees of the project area and the abutting neighbors would benefit from active recreation in addition to passive parks. This feedback is underscored by many of the comments and observations provided during the project planning workshops last year. The Proponent should explore opportunities to invest in offsite open space, pedestrian and bicycle networks to integrate Suffolk Downs into the neighborhoods of East Boston and Revere. Additionally, there could be dramatic regional benefits associated with connecting to DCR parkland and reservations including Revere Beach, Belle Isle Marsh, and Constitution Beach.

The City of Boston and Massport have invested over \$8.5 million in the East Boston Greenway over the last few years extending the Greenway by one mile and connecting the harborfront to the beachfront. These improvements were completed in partnership with DCR and MBTA. The Greenway, a grass roots idea in the making for the last 20+ years, includes the neighborhood’s centerpiece open spaces, including Piers Park, Bremen Street Park, and this new connection from Wood Island Marsh to Constitution Beach. The East Boston Greenway is a critical pedestrian and bicycle route for the neighborhood and was envisioned to connect to Belle Isle Marsh and beyond. The redevelopment of Suffolk Downs presents an opportunity to create critical links into and along this highly successful series of public open spaces (already with many jurisdictional ownerships), add new premiere open space along the Greenway, and to finally make safe, meaningful connections from Belle Isle Marsh into Revere and beyond. The East Boston Greenway has only two roadway crossings as it stretches from Piers Park to Constitution Beach, a remarkable feat for an urban area. The ease of bicycle connectivity is conducive to a strong bicycle mode for the project if the Greenway were linked to Suffolk Downs. The Proponent

should also analyze the railbed along Chelsea Creek for open space amenity, connectivity, and drainage implication. See the Transportation and Infrastructure memo's discussion of "Bicycle and Pedestrian Network."

### *Public Realm*

The concept of public realm extends beyond publicly accessible open space to include public assets such as libraries, youth centers, schools, and more. Civic and cultural spaces are an important part of neighborhood character and signal to the public who is welcome here. Identify opportunities to incorporate community assets which are not necessarily part of the open space network, and identify how these assets would integrate with / be distinct from surrounding development.

### **Encourage Contextually Sensitive Development**

Today the site operates almost as an island, bounded by infrastructure (the Blue line) and industrial uses (Irving Oil Terminals) on two sides. While acknowledging that there are limited opportunities to create connections to existing neighborhood fabric, the project should make that effort wherever possible.

### *Context*

Adjacent neighborhoods including Harbor View, Orient Heights, and Beachmont are structured around one, two, and three family dwellings on lot sizes most often under 10,000 square feet. Though the proposal contemplates primarily multifamily products, it is important that where the project meets neighborhood fabric, it responds appropriately in scale, frontage and access. At public meetings, participants expressed specific concerns about the proposal's relationship to Waldemar Avenue.

### *Honoring the History of the Site*

After operating for more than 80 years as a thoroughbred race track, community members were hopeful that memory of Suffolk Downs would be retained and incorporated into the development. Please outline strategies for documenting / cataloging existing conditions, determining historically significant structures / ephemera, demolition of existing on-site structures and commemorating the legacy of Suffolk Downs in future development.

### **Phasing**

As referenced in the EPNF, the Proposal anticipates a 15-20 year build out which would accommodate a variety of build-out scenarios. It has been expressed in public meetings that if Amazon HQ2 were to initialize the Project, that several buildings would be built concurrently with Phase 1. Elaborate on this scenario including what infrastructure and public realm would be included to support the initial phase. If Amazon HQ2 were *not* to initialize the Project, please elaborate on this scenario including the program and scale of

an Alternative Phase 1, and what infrastructure and public realm would be included to support.

Regardless of Amazon's decision to move forward with Suffolk Downs as their HQ2, elaborate on phasing scenarios leading to full build out, including timing of infrastructure and public realm.

## **Urban Design Overview**

### **Adaptability of the Project/Block Morphology**

Creating a site that is flexible and adaptable over time is closely linked to block morphology. Understanding that full build out will likely happen over decades, the attempt to bake in flexibility is wise. In light of that, the blocks represented in the schematic master plan diagram are larger than conventional blocks. Though this is not intended to be a literal manifestation of building footprints, there is nevertheless concern the blocks are overly large, and that a finer grain of both buildings and blocks should be considered. It is difficult to discern the difference between the proposed built site uses, as the scale forms of the buildings and most of the blocks are similar. Introduce variety into the plan to make the intended scale and organization of the site more legible.

Conversations with the Proponent and their team have discussed a move away from typical, modern block morphology—i.e. a single building surrounded on all sides by streets (as seen in the Seaport or other large-scale master plan developments such as Cambridge Crossing)—and instead a desire to consider multiple buildings on a single block “campus.” This presumes a finer grain of connections between the blocks, but these are not yet represented in the Master Plan. Nevertheless, given the scale and economics of modern building construction, there is concern that limiting the street network will negatively impact the highly connected, publicly-accessible and porous nature of these blocks and the larger site. For that reason, a better articulation of why superblocks are preferred to blocks with more manageable dimensions is needed. Limits to amount of constructed roadway is a factor of both design and cost. The uniqueness of this context requires exploration of many alternatives, particularly given this project is poised to be the largest permitted master plan in Boston's history. It may be that certain “neighborhoods” have larger blocks, but the Main Street Retail District may deploy more typical blocks as this central neighborhood should have the greatest mix of uses and building typologies. Also considering its broad western face to 1A and the unknown future of the adjacent industrial oil tanks, it might be prudent to consider a more conventional street grid to better connect to future conditions. There is no reason why a single block morphology needs to populate the entire 161 acres.

It seems that the master plan diagram comes from a desire to preserve and reuse existing site elements (retaining the track infield, the infield pond, linear wetlands, and the layout of

Tomesello Way) for ease of implementation. More study is required to understand if simply reusing these remnants of the Suffolk Downs site, largely unchanged, is warranted as the best overall approach to a final build out of the master plan. With the advanced approval of Phase I, the development team is now afforded an opportunity to review and study the master plan's layout to a higher degree and better understand if the currently proposed configuration is the best possible. The plan requires more creative thought around the potentials of restoration, improvement, and interconnection of the water and wetland resources and the legible integration of these on-site natural systems into the communities to the north and south.

### **Height, Use and Massing**

The preliminary shaded land use diagram provides some indication of building use, but residential and commercial appear comparable in dimension. We presume that there would be much greater heterogeneity in building scale that reflects the underlying use, but this should be refined further.

We are unsure about the strategy behind the current proposed locations of many of the uses: residential is relegated to the far edges of the site while commercial/office is centralized and given proximity to the largest concentrations of open and recreational space (15 acre park and sporty spine). There is concern that the gaming of the FAA guidelines to provide greater height closest to 1A creates a scenario where multifamily residential is overscaled and underserved by other uses. Though Boston and Revere may have different land use priorities, we believe the success in creating a "vibrant, mixed use community" hinges on a mix of uses, but also end users of different incomes. Increasing housing capacity should balance maximizing density while creating diverse housing typologies. Explore opportunities to create housing which provides transition from the established single and two family homes in adjacent neighborhoods to larger multi-family products.

The aspiration for dynamism requires a mixing of people, use, height, and building morphology to create an environment that is compelling. Nevertheless, because of FAA height restrictions and the surrounding context of Orient Heights and Beachmont, this area is unlikely to be built to resemble a quintessential mixed-use downtown environment, but rather a TOD mixed-use neighborhood.

Greater study is needed on the Boston edge adjacent to the Orient Heights neighborhood, particularly given the close proximity to single family residential and the BHA Orient Heights redevelopment. The Proponent should study a variety of buildings, street configurations, and block typologies, paying close attention to the grading. Could a residential building type that takes advantage of the natural grade to provide dual access be considered along this edge? For example, could a street entrance for pedestrians and access for parking be designed along Waldemar, while also creating a second building front

with pedestrian and vehicular access from the Suffolk Downs side? In light of the recently constructed BHA development, this may be a welcome opportunity to complete the street.

Concurrently, consider the realignment of Tomesello Way as it enters the site from Route 1A. Study if there are benefits to moving the proposed height and density adjacent to the densely vegetated, linear wetland along the entry spine to move it away from the Orient Heights neighborhood along Waldemar Avenue. Again, this may provide an opportunity to put some lower height along the northern edge of Waldemar Avenue to complete and scale Waldemar's cross section.

The Boston edge, in particular, should be studied through section, 3D/axonometric drawings, and/or digital models that include accurate topography of the surrounding neighborhoods and natural features. Numerous sections should be provided to capture grading strategies at the site scale, block or area scale, and individual building scale.

## **Streetscape**

More and better information on the proposed hierarchy of new streets is needed, including on-street parking locations and anticipating how buildings might be serviced, if only conceptually. Provide cross sections not just for the primary streets, but also interior block or separate ped/bike connections. How do those relate and what is the scale relative to the buildings? Are there examples from elsewhere that have informed this strategy? How might through-block ped/bike paths connect to a perimeter sidewalk and typical roadway?

Again, the Master Plan's stated goals of connectivity and accessibility seem to run counter to the superblocks that populate the larger site and limited streetscapes that have currently been described. The EPNF identifies 4 streetscape types (Landscaped Parkway/Boulevard, Interior Complete Streets, Green Spines, and Sporty Spines) which are discussed in more detail below.

### *Landscaped Parkway Boulevard*

The design of the open space alludes to Olmsted's Emerald Necklace, but is fundamentally dissimilar in that the proposed open space is physically connected to the proposed commercial/retail/hotel (in Program A) or residential (in Program B), rather than separated by a street or carriage road. These types of utilitarian interventions help to provide clear park boundaries and help to make these spaces feel more "public" in nature by physically disconnecting them from their neighboring private uses. Reconsider the layout and alignment of the proposed boulevards to better define the shape and public status of the parkway open spaces.

### *Interior Complete Streets*

We would expect variety in the range of interior complete streets, and not a single typology. It is presumed that any new secondary streets would also be designed in the



spirit of Boston's Complete Street Guidelines. See the Transportation and Infrastructure memo's discussion of "Internal Site Streets."

### *Green Spines*

We understand these "green spines" to be similar to the "Coastal Mews" concept being developed as part of Phase I, though the landscaping and vegetation may vary. Depending on the spacing between buildings, these may be a challenge to program and landscape. Again, why not consider a block morphology that is more archetypically urban? We have concerns about the perception of public v. private nature of these spines, and by extension, equitable access to them. Regardless, connections to, adjacent to, and across existing and proposed water and wetland features should all be thought of early on as a family of infrastructure consistent in design and detail for legibility across the entire site, and appropriately scaled for the intended users.

### *Sporty Spines*

More and better information is needed on the specific types of active recreation spaces that are a part of the "sporty spine" and how these will either fulfill needs or augment existing uses identified in the Boston Open Space Plan. We believe that given the scale of the overall development and the 15 acre common area, the active programming should support not just East Boston, but the entire city as a whole.

## **Circulation and Accessibility**

More and better information regarding how pedestrian (limited) and bicycle (none) connections will be made to established bordering neighborhoods in East Boston from the site, including to the adjacent MBTA stations. MBTA station connections in the early phases of the development will be critical to establishing transit-oriented commuting patterns for new residents and workers.

More detailed study is needed for bus, vehicular, pedestrian, and bike circulation nearest to the Suffolk Downs T. We would like to see pedestrian, bike, and bus connections strengthened to Belle Isle Square and the T Station. At the intersection of Waldemar Avenue in the southeast corner of the site, blocks and buildings should be designed in a manner so as not to preclude future vehicular connections from the neighborhood to the site. Direct vehicular connections from Revere are integrated on the northern edge of the site, and it is important to maintain options on the Boston side for all modes of circulation in the future. Earlier comments regarding block porosity and scale also relate to circulation and accessibility. See the Transportation and Infrastructure memo's discussion of "Site Access."

Local and regional pedestrian and bike connections to the site should be further explored and represented at a scale that is legible. How will this open space and mobility network connect to East Boston (Belle Isle and East Boston Greenway) and Revere (Revere Beach

Parkway and Beach)? How might connections to Belle Isle Marsh be constructed? Is there an at grade strategy across Bennington Street or is a pedestrian/bike bridge warranted? Near-term implementation of these connections is preferable.

Other supplementary circulation, including a shuttle route and stops, MBTA bus infrastructure and proposed stops, autonomous vehicle performance standards and storage, and TNC curbside accommodation should be further studied and incorporated into the next iteration of the master plan, and represented in both plan and street cross-section. Please see Transportation and Infrastructure memo for more detailed comments.

### **Civic Architecture and Public Realm Design**

During the next phase, the design team should identify more precisely the locations for all civic architecture – i.e. any building that includes or may include a publicly accessible use. We expect additional study is warranted to determine whether city-owned facilities (schools, fire stations, library services, etc.) are needed given the scale of the proposed development, but the location and design aspirations for these facilities should be developed during the master planning phase. Though some flexibility will naturally be accounted for, detailed design guidelines and a commitment to design excellence should be established as a core objective for these facilities.

As in any urban fabric or large-scale master plan, certain buildings and spaces are under greater design pressure given their location, visibility, access to key amenities, etc. The design of Belle Isle Square is one such space, and the design of the architecture of framing buildings, as well as the design of the public realm, is paramount. In this wedge-shaped plaza, careful selection should be made of all public realm materials and other plaza elements (exterior furnishings, landscape, public art, pavilion architecture, etc.) Detailed illustrative representation and design guidelines should accompany this, and other, key spaces. It is expected that a similar exercise will be completed in parallel for Beachmont Square. Though located in Revere, it is important to understand the relationship—both through design aspirations and through physical connections—of how these two important gateway-nodes relate to one another, to the rest of the larger Suffolk Downs site, and to points beyond. Here, unlike other areas of the master plan, certain facades or roofline elements may terminate a long view or facilitate wayfinding, and should be studied alongside finer grained material elements.

Just beyond Belle Isle Square, the primary entry/departure for all T riders is the pedestrian/bike bridge over the southeastern edge of the wetlands running alongside the rail line. Conversations with the Proponent and design team have already singled out this critical infrastructure as important threshold and gateway for the project. We expect this piece of infrastructure-architecture to be more than a utilitarian feature, functioning as an amuse-bouche for the site beyond, yet scaled appropriately. There may be other elements (another footbridge over Sales Creek or pond, an open-air pavilion structure in the park or

amphitheater) that may be similarly deserving of up front design thinking, and we look forward to working with the proponent on identifying these important elements.

Though we expect there may be some modifications to the overall plan configuration, it seems likely that a large open space will be retained as a core feature of the master plan. Given that, there should be careful study of the building facades surrounding the park, particularly given the sinewy curves that are suggested in the current site plan. How these buildings function as a backdrop to the open space, but also relate to one another on both a ground and upper floor level should be studied.

Though it is not yet clear where commercial uses will be concentrated, the character and design of the Main Street district should be clearly articulated including streetscape design, but also the design of any new commercial prototypes. The prevalence of multistory retail podia on new construction makes this exercise particularly critical, though it is not clear that this is something that will be widely prevalent at Suffolk Downs. Regardless, storefront design and associated signage along a Main Street and in other parts of the site should be studied and represented even at the master plan stage in order to anticipate and inform any future design of buildings.

### **Open Space Plan and Landscaping**

The Suffolk Downs site sits adjacent to Belle Isle Marsh, the last remaining salt marsh in the City of Boston. The site itself is a filled salt marsh and, therefore, the open space system proposed for the site's redevelopment seems obliged to tell the ecological history of the site, including highlighting the remnant connections to the Belle Isle Marsh (and the Harbor), the lineage of Sales Creek, and the evolution of the created wetlands at the edge of the site. Much can be done to improve and augment the quality (and, perhaps, capacity) of the water and wetlands that remain on the site, both for the ecological health of the site and for the activation of the proposed open spaces. The goal for the open space system in this redevelopment should be one that both creates and supports resiliency, recreation, connectivity, and provides a narrative on the ecological evolution of the site and continued role that the open space will play.

How can the plan better incorporate and enhance the existing wetlands as an open space and aesthetic resource for the site? Currently on the west edge of the site, the proposed multi-use paths are depicted on the opposite side of Tomesello Way and overall provide no connection to these linear wetlands. It seems like a missed opportunity to enhance these areas either for improved functionality, or at the very least, an aesthetic resource within the site's open space system. On the western edge, we encourage the proponent to look beyond McClellan Highway to the Chelsea River for possible public connections to the water's edge in future scenarios.

Again, programming for the open space and central 15 acre common should fulfill needs or augment existing uses identified in the Boston Open Space Plan. We believe that given the scale of the site and the 15 acre common area, in particular, the active programming should support not just East Boston, but the entire city as a whole. Can active recreational amenities like soccer fields be included to complement some of the more passive open space features or episodic “sporty” moments that have been described? See the Boston Parks and Recreation Department memo for more on open space and parks.

## **Materials**

The following materials for the Proposed Project’s schematic design must be submitted for the DPIR. Scale of materials will be variable depending on intent of drawing, but the Proponent should consult with BPDA to ensure that adequate context is captured. The overall intent is that materials should represent a level of thinking and representation associated with a more detailed master planning exercise. Certain buildings and/or site features may require additional representation beyond those described below. Please use this list as a suggestive starting point for the full complement of necessary drawings, illustrations, renderings, and 3D models/physical models needed to adequately represent the Master Plan.

### *Plans*

1. Regional plans showing connections to the larger systems of open space amenities (East Boston and Revere) and transportation infrastructure including bike, pedestrian, T, and bus.
2. Site Plan Drawings including diagrams (land use, etc.), sections, elevations, and other 3D representation. Please include sufficient surrounding context (in consultation with the BPDA) demonstrating relationships of the proposed project to the neighborhood context.
3. Interior “Neighborhood” plans, elevations, and sections at an appropriate scale, but with enough detail to understand block morphology, building footprint dimensions, landscape architecture, service and loading, building access and entrances, and all circulation. Any meaningful ground level programming should be clearly articulated to understand relationships between and among buildings and public realm.
4. More detailed building scale plans or detailed design guidelines for Phase I and proposed first phase elements. Detailed drawings anticipated for any significant open space or public realm amenities, including, but not limited to, Belle Isle Square, the central common, any civic buildings or known “celebratory architecture.”

### *Models*

1. Digital 3D model including surrounding context and accurate topography. Model should include architecture, landscape architecture, other infrastructure (bridges,

bus stops, etc.) at a level of detail that gives real-world impression. Given the resources known to be available to the design team, we encourage the full use of new modeling and virtual reality tools to explore representation of the Master Plan.

2. Physical model at an appropriate scale to be used as a tool with BPDA and other public agencies, as well as community and other stakeholders

*Perspectives (preferably non-distorted)*

1. Orient Heights neighborhood toward development / Belle Isle Marsh demonstrating impact on viewshed
2. Route 1A (William F McClellan Highway) approaching development in both directions
3. Tomesello Way near intersection with Route 1A (William F McClellan Highway) down length of residential development
4. Multiple views relating to Belle Isle Square (approach, multiple interior locations, from the MBTA station, looking back at the MBTA station, view to/from Central Common)
5. View from Belle Isle Marsh
6. View from train and/or Bennington Street
7. Multiple perspectives from Revere, including from Furlong Drive/existing shopping center
8. Multiple views relating to Beachmont Square
9. Views at any key pedestrian and bicycle connections to/from East Boston neighborhood
10. Multiple streetscape views including Main Street, "Sporty Spine," and typical interior streets illustrating different uses

## MEMORANDUM

**TO:** Tim Czerwienski, Project Manager  
**FROM:** Vineet Gupta, Director of Planning, Boston Transportation Department  
John (Tad) Read, Deputy Director for Transportation & Infrastructure Planning, BPDA  
Keith Bynum, Senior Traffic Engineer, Boston Transportation Department  
Bob D'Amico, Senior Planner, Boston Transportation Department  
Matthew Moran, Senior Transportation Planner, BPDA  
**DATE:** February 21, 2018  
**SUBJECT:** Suffolk Downs Redevelopment - **Transportation and Infrastructure Comments**

### Overview

The Suffolk Downs Redevelopment represents one of the largest single development proposals in the City of Boston's history. With limited connections to a regional roadway system, access to a single subway line, and significant susceptibility to 100 year flooding and sea level rise, the project site poses serious challenges for development of this scope. With these factors in mind, that we offer the following recommendations for the project Scoping.

### Overarching Goals

Given the congestion on Route 1A and limited access to this and other regional arterials, the Proponent should make concerted efforts to minimize single occupancy vehicle use as a means to reducing vehicular trips while maximizing more sustainable modes, including transit, walking, bicycling, and ride-sharing. Boston's citywide transportation plan, *Go Boston 2030*, identifies the following aspiration mode share goals relative to how people get around the city in 2030. These should be the stated goals of the project as well.

#### Go Boston 2030 Mode Share Goals

Public Transit	44%
Walk	20%
Bike	8%
Carpool + HOV	5%
Drive Alone	20%
Other/Work from Home	4%
TOTAL	101%

\*NOTES:

*Percentages are approximate and add up to more than 100%.*

*The mode shares to be used for trip generation are different and outlined in the “Transportation Modeling Methodology” below.*

The comments contained in this memo are focused on measures that the Proponent should take in project planning and design to align anticipated and actual project mode shares with these City 2030 aspirational goals.

### Go Boston 2030 Emission Goals

Boston’s citywide transportation plan, following the lead of the City’s *Climate Action Plan*, has established an aspirational goal to reduce greenhouse gas emissions by 50% of 2005 levels by 2030. This goal also drives the focus on encouraging the Proponent to embrace non-motorized transportation and clean fuel use. In addition Mayor Walsh has committed to work toward making Boston carbon neutral by 2050.

### **Phasing**

The Proponent should provide greater details on how the master plan will be phased, as impacts are expected to vary over time as technology and transportation initiatives evolve. Commitments to submit impact analysis at key build-out thresholds should be outlined. At each stage, particular emphasis will be required with respect to:

- Timing transportation mitigation such a public transportation improvements *in advance* of development
- Phasing in parking supply to avoid overbuilding in the initial phases.
- Conducting updated transportation modeling (Synchro) analyses at key phases/build-out thresholds.

### **Synergy with Urban Design**

The character and quality of the built environment and urban design have a significant effect on how people feel walking or bicycling--as opposed to using motorized transportation. The scale and orientation of buildings in relation to streets and sidewalks; dimension of blocks; relationship of buildings to the street and sidewalk; sidewalk character and dimensions; inclusion of safe, comfortable bicycle paths; the presence or absence of view corridors and wayfinding; an overall sense of human scale--all of these factors can significantly influence mobility behavior and willingness to walk and bicycle. Since significantly increasing walking and bicycling mode shares are critical for the sustainability of this development, we want to emphasize our strong support for the recommendations from the BPDA Urban Design team that speak to these considerations.

Of particular interest are the following:

- Orientation: Streets meander so extensively and buildings depicted are so homogeneous in size and scale that it is unclear how pedestrians and bicyclists will

become oriented without certain prominent architectural and/or landscape features serving to help orient. What will be the internal landmarks and view corridors to draw people in and through, especially from major external entry points, such as the MBTA stations?

- Wayfinding: What system of wayfinding will be used to help orient and guide pedestrians and bicycles?
- Block Size: Certain block sizes depicted are overly large and would not be at a scale that easily invites walking.
- Active Ground Floors and Street Edges: Active ground floors and street edges create activity and life. A diagram showing where these are would be helpful for understanding the need to certain pedestrian and sidewalk dimensions and amenities.

## **Site Access**

Site access will be critical in determining the future success of the Suffolk Downs project. Existing transportation networks in the East Boston neighborhood are burdened and site access is constrained by existing industrial and residential uses on either side. However, the proposed project also represents the potential to improve neighborhood connectivity to Downtown Boston and the broader region while increasing sustainable mode shares.

### *Connections to Route 1A*

Existing connections to Route 1A are limited. Since Route 1A will be a primary vehicular and bus connection to and from the project site, it is extremely important that connections to Route 1A maximize flexibility and porosity.

- The Proponent should review and evaluate all of the proposed traffic mitigation measures made by the proponents of the Suffolk Downs casino. Each of the proposed mitigations in that project should be evaluated for feasibility and benefits taking into account updated traffic counts and conditions. This should include studying the need for a grade-separated Boardman Street and working with city and agencies to develop a design and contribute to the construction of a selected alternative.
- New connections to 1A should be studied, including connections at Furlong Drive and Tomesello Way. The proposals should prohibit a direct left turn on to Route 1A southbound. The two intersections as well as the southbound turnaround “jug handle” should be evaluated together in designing the new proposals.
- Note that there should be no vehicular connections to Walley Street.

### *Connections to Winthrop Ave.*

We support the connections to Winthrop Avenue as described in the Expanded Project Notification Form. Further elaboration and modeling of these connections should be conducted.



### *Potential Future Connections*

At the intersection of Waldemar Avenue in the southeast corner of the site, blocks and buildings should be designed in a manner so as not to preclude future vehicular connections from Bennington Street into the site in the long term, should this be deemed necessary.

## **Internal Site Streets**

### *Street Design*

The Proponent should follow the broad principles and guidance specified in *Boston's Complete Streets Guidelines* in designing the internal street network. These include bicycle and general travel lane widths, sidewalk widths, street tree spacing and root environment, sidewalk materials, the configuration of curb lines at intersections, and crosswalk design.

### *Curbside Parking*

The Proponent should lay out a conceptual plan that lays out the anticipated curbside parking regulations. Will there be time limits and parking meters? What is the strategy to combine shuttle pick-up and drop-off and valet spaces?

### *Neighborhood Cut-Through Traffic*

The Proponent should detail measures that will prevent neighborhood cut-through traffic such as limiting Waldemar Ave to bike and pedestrian connections only.

## **Shared, Connected (and Autonomous) Mobility**

The way Bostonians get around the city is changing rapidly. Today there are more travel choices with the rise of on-demand mobility services - people can summon shared-car rides or bicycle short distances using the bike-share network. For example since launching in July 2011, Hubway users have taken more than 5.3 million trips, with increases each year. Plus, real time information on travel options is practically free and readily available - with next train/bus or bike rental availability alerts literally on a rider's fingertips. New facilities, such as an expanding network of bike-share and car-share stations, have contributed to these trends in travel behavior.

### *Character and Status of Curbside Drop of for On-Demand Car Services*

The street and circulation plan should show clearly and specifically where and how on-demand bicycle and car services will be accommodated in streets, public ways, and private developments. Estimates and assumptions for future demand for such services should be quantified and explained, and the relationship between such estimates and provisions made in the plan for these services should be made explicit. If the plan must be adaptable over time to accommodate an increase in on-demand services, where and how it will be adapted should be specific and detailed.

### *Neighborhood Mobility microHUBs*

The Proponent should establish a network of *microHUBs* in the project area. Centered around subway stations, bus and shuttle network nodes, and local destinations such as community centers or small-business streets, and within high-density residential enclaves, they provide access to bike-share, car-share, secure bike parking, ride-hailing pick-up spots, wayfinding, free Wi-Fi, and real-time, information amenities.

### *Flexibility for Shared Autonomous Vehicle Technology*

Technology is evolving quickly and in such a way as to suggest a significant increase in the near future in the use of shared autonomous vehicles--with simultaneous significant reductions in private automobile ownership and use. This, in turn, could have major implications for roadway design, parking demand, the need for pick up and drop off, urban design, and other infrastructure needs. The Proponent should study the potential implications and opportunities that the rapid advancement of shared autonomous vehicle technology presents. The study should also describe how the proposed project will anticipate these changes, including flexibility in the design to readily accommodate rapid shifts in transportation technology and travel behavior.

## **Transportation Modeling Methodology**

The Proponent should prepare a Synchro model for the site and study area using projections of future traffic volumes, at full buildout and at key points in project phasing (25% build, 50% build, 75% build--or other appropriate phasing milestones).

### *Study Area*

BTD Engineering believes that the study area should be expanded to include impacts to the Route 1A Sumner and Callahan Tunnels, the Day Square area, Chelsea Street Bridge and Meridian Street Bridge. In addition, note that the Bennington/Saratoga intersection is listed twice in Section 5.2.2; replace one with Bennington/Swift. BTD Engineering will confirm the adequacy of the study area intersections.

### *Trip Generation Mode Share Assumptions*

For purposes of modeling, and for the initial project phases, BTD Engineering requests that the Proponent conduct a model run using the mode share assumptions contained in Table 5-10 (page 5-38) of the November 30, 2017 Expanded Project Notification Form for the first phase as recommended by the Proponent and for the full build out. This is particularly needed to account for "worst case" scenarios where TNCs and autonomous vehicles in fact increase the number of motorized vehicles on Boston's streets. At the same time, for comparison purposes, the Proponent should also propose higher mode shares for transit and bicycle use at each phased build out in conjunction with the Boston Transportation Department.

## **Transit Network & Accommodations**

Improved and expanded transit opportunities will be key to minimizing increased roadway congestion, reducing carbon emissions, and creating a walkable place. Transit will be a key element for the success of the Suffolk Downs site. With two stations nearby and unused passenger capacity, the Blue Line is an important resource to the project. At the same time, the condition of Suffolk Downs station is deteriorated, and flood risks and sea level rise pose challenges of safety and emergency access. Transit upgrades, safety improvement and flood mitigation have the potential to provide substantial benefits to the surrounding neighborhood. The section describes the key bus, shuttle, and water service to the site. Among the issues and opportunities that should be explored are the following:

#### *Blue Line and Blue Line Stations*

- Proponent should describe how Suffolk Downs Station will be repaired to address deteriorated conditions at the Station and how this will be funded.
- Proponent will evaluate the risks for 100 year flooding and sea level rise to impact the Blue Line and explore improvements that would mitigate the impacts.
- Explore how activating spare Blue Line trains could help meet demand at partial and full build.
- Explore how to incorporate space at MBTA stations for bus turnarounds and accommodation of TNC service.
- Proponent should study the impact of the Red/Blue Connector on transit access to the site, including mode splits, travel times, and connections of the East Boston neighborhood.

#### *MBTA and Regional Bus Service*

- Proponent should study key regional connections to the Suffolk Downs site using either MBTA or publically-open shuttle connections, including:
  - A route connecting South Station, South Boston Seaport, and Logan Airport to the site, including potential use of the single rail spur extending along the eastern edge of Chelsea Creek from approximately the Chelsea Street Bridge to Tomesello Way.
  - A route connecting the site to a station on the northern branch of the Orange Line such as Sullivan Square, Assembly, or Wellington;
  - A route connecting the site to the Newburyport/Rockport Commuter Rail Line in a location such as Chelsea.
- Proponent should study potential value of connecting to local and regional MBTA bus services on Route 1A and convenient connections to regional service to the site, including direct on site access.
- Proponent should confer with the MBTA about the possible need for additional MBTA bus maintenance capacity to serve the increased MBTA service that will likely be necessitated by the the new development at Suffolk Downs site to serve new Silver Line, local, or regional buses anticipated at the site.

- Proponent should explore and evaluate subsidies for MBTA bus services to enable service enhancements into the site.

#### *Internal and Local Bus Services and Shuttles*

- When will the proposed internal shuttle service connecting to stations be activated, and how does this related to overall project phasing?
- To what extent will the project utilize zero-emission shuttle vehicles? This will be necessary to achieve meaningful carbon reductions.
- Explore local shuttle and/or bus service to and from nearby neighborhoods.
- Proponent should explore shuttles service to nearby transportation hubs such as Logan Airport and North Shore Commuter Rail Lines.
- Proponent should analyze where within the master plan bus and shuttle service desire lines may be greatest and incorporate into the street network dedicated lanes to facilitate rapid movement of these services.

### **Water Transportation**

Past projects proposed for the Suffolk Downs site explored the potential of water transportation. While the site does not have direct access to the water's edge, it is proximate to Chelsea Creek and Belle Marsh waterway and connected via ground transportation to the East Boston Inner Harbor waterfront including an underutilized water transportation terminal at Lewis Mall.

Earlier analysis of water transportation opportunities for the project site flagged the challenges of Chelsea Creek and Belle Marsh waterway including water depths, overhead clearances and potential conflict with boating/shipping interests. Chelsea Creek lacks public access and docking infrastructure. Chelsea Creek and Belle Marsh waterway would also pose longer travel times due to distance and the above referenced navigational challenges.

Of the three waterways options, in terms of convenience and practicality of utilizing water transportation as mode of transportation to the project site, the direct route across Boston Inner Harbor to the waterfront of East Boston and thence to ground transportation (Blue Line etc.) may be the most efficient. Inner Harbor service from East Boston is under study with possible connections to the South Boston Waterfront and even North Station.

The proponent should review past water transportation analysis and plans and the Boston Harbor water transportation planning underway and managed by MassDOT, Masport and Boston Harbor Now. We ask for updated analysis and exploration of support for water transportation service particularly from the East Boston Inner Harbor waterfront to other waterfront neighborhoods in Boston.

### **Bicycle and Pedestrian Network**

The project's success in maximizing sustainable, non-SOV mode share, will depend in no small part on the quality of the bicycle and pedestrian infrastructure. The Proponent should reference the Boston Bike Network Plan recommended in the Go Boston 2030 Action Plan. With this in mind, we offer the following comments.

- Proponent should provide a detailed plan of sidewalks, pedestrian plans, and bicycle plans throughout the project, including dimensions.
- Proponent should provide details on how internal bicycle and pedestrian paths will be connected to the regional network.
- The character and quality of pedestrian and bicycle connections to T stations should be emphasized particularly connecting to Belle Isle Marsh without having to go through the "paid" Suffolk Downs Station lobby.
- Proponent should detail how the internal network will be separated from automobile traffic.
- The approach to bicycle parking, both in the public realm and individual buildings, should be described, including the character and quantity of bicycle parking near all MBTA stations.
- Proponent should map existing local and regional bicycle and pedestrian systems and prepare a diagram and plan showing how the project will connect to these systems. Of particular interest are the following:
  - The East Boston Greenway is a critical pedestrian and bicycle route for the neighborhood and envisioned to connect to Belle Isle Marsh and beyond. The East Boston Greenway has only two roadway crossings as it stretches from Piers Park to Constitution Beach, a remarkable feat for an urban area. The ease of bicycle connectivity is conducive to a strong bicycle mode for the project if the Greenway were linked to Suffolk Downs.
  - The proponent should explore opportunities to invest in offsite pedestrian and bicycle networks to integrate Suffolk Downs into the neighborhoods of East Boston and Revere.

## **Transportation Demand Management**

A critical part of reducing Single Occupancy Vehicle use and achieving more sustainable mode shares will be having a successful Transportation Demand Management (TDM) Program. Therefore, the Proponent should prepare a Parking and TDM Plan for the project. The goal of the plan should be to demonstrate the measures that the Proponent will take to achieve the mode share goals specified in *Go Boston 2030*.

The plan should describe the proposed and/or alternative mix of land uses; proximity to public transit and other non SOV facilities; number of residents, as well as number of employees and their places of origin; the number and type of patrons and users of proposed parking supply and their likely place of origin; the number of vehicle trips expected to be generated by the project along with description of measures to reduce

associated traffic impacts on nearby streets; and a commitment to implement vehicle trip reduction measures including some or all of the following:

- Subsidized MBTA passes and other incentives to use bike share, rideshare, and shuttle services
- Designated Bus / Shuttle / Ride-share pick-up/drop-off areas
- Shuttle services
- Ride sharing services
- Consolidated bicycle parking, showers, and repair facilities
- Preferential parking for Low Emission Vehicles, Zero Emission Vehicles, carpools, vanpools and other trip reduction measures.
- Real-time transit and mobility information within buildings
- A comprehensive car share network plan for the district
- Unbundled parking from residential units

The commitment should be accompanied by a detailed description of the measures proposed to be implemented. However, the commitment to TDM should be flexible enough to not preclude advances in transportation technology. These elements will ensure the Suffolk Downs community has a comprehensive set of transportation options and will help to ease the burden on the East Boston and Revere transportation networks.

The Proponent should also study the creation of a Transportation Management Association (TMA) for the entire Redevelopment area that each and every building owner and lessee would participate in. The purpose of the TMA is to coordinate district-wide transportation services and act as an intermediary between building owners/resident associations and their access to the broader transportation network.

### **Parking Management & Loading**

Parking and loading are key considerations for internal circulation, access to city streets, and pedestrian/bike networks. Key consideration should be given to the following items:

- The Proponent should consider the following parking ratios: 0.75/residential unit, 0.5/1000 sq. ft. office, retail, lab; and 5% minimum electric vehicle charging equipped, with another 10% make-ready wired.
- Bicycle parking should be provided as per BTM guidelines.
- Proponent should provide additional details on parking and loading access points. This should include details on parking garage entrances, loading dock points, and any other vehicular access points. Proponent should minimize parking and loading dock entrances by having consolidated loading and parking access where possible.

### **Coordination with Environment and Resiliency Comments**

As detailed in the Air Quality section of the Environment and Resiliency comments, the Proponent should conduct an analysis to measure pollutant emissions from transportation

related emissions generated by the project including a microscale, intersection by intersection, analysis to determine the effect of project generated traffic on air quality.

## **Smart Utilities**

The Proponent should propose a utilities infrastructure master plan including phasing and connections to existing systems with respect to the Smart Utilities guidance detailed below.

### *Smart Utilities Vision*

In close collaboration with the Public Works Department (PDW), Boston Transportation Department (BTD), Boston Water & Sewer Commission (BWSC), Department of Information Technology (DoIT), and other City agencies, and departments, the Boston Planning & Development Agency (BPDA) has been exploring a new model for integrated planning among energy, transportation, water, and communications utilities. Out of this exploration has emerged a draft Smart Utilities Vision which aims to transform the business-as-usual model of utility design, planning, and coordination and reducing unnecessary street disruptions and associated costs. By improving planning and coordination, utility service can be made more affordable, resilient, equitable, and sustainable.

Two key recommendations have emerged as part of the Smart Utilities Vision that are being considered for adoption as policy: the *Smart Utilities Standards*, and the *Smart Utilities Policy for Article 80 Development Review*.

- The *Smart Utility Standards* set forth guidelines for planning and integration of Smart Utility Technologies with existing utility infrastructure in existing or new streets, including 10 Smart Utility Technologies and a cross section of an ideal layout for underground pipes in 40' and 60' right-of-ways. The *Smart Utility Standards* are intended to serve as guidelines for developers, architects, engineers, and utility providers for planning, designing, and locating utilities.
- The Smart Utilities Policy for Article 80 Development Review in its draft form (as of January 2018) is outlined below. The policy continues to be reviewed and will likely evolve further before final adoption.

### Smart Utilities Policy for Article 80 Development Review

The draft policy as of January, 2018 is outlined below. This draft is subject to further change and refinements prior to final adoption (please contact Manuel Esquivel at [Manuel.Esquivel@boston.gov](mailto:Manuel.Esquivel@boston.gov) for any updates).

Projects subject to Article 80B–Large Project, Article 80C–Planned Development Area, and/or Article 80D–Institutional Master Plan review shall be asked to incorporate Smart Utility Technologies (“SUTs”) into the infrastructure design and planning process. Utilizing the most recent [Smart Utility Standards](#) provided by the Boston Planning & Development Agency (“BPDA”) and the City of Boston (“City”) (available at: <http://www.bostonplans.org/planning/planning-initiatives/boston-smart-utilities-project>),

the project proponent will be asked to integrate the applicable SUTs into the design and planning of utility infrastructure for water (including but not limited to sewage and stormwater), energy (including but not limited to gas, electricity, and steam), communications, and transportation services.<sup>1</sup>

*Applicable Development Review Threshold Criteria*

SUTs required for Article 80 projects will depend on: (a) the floor area of the Project and/or (b) the Project's required mitigation of traffic, street lighting, and surface water runoff.

- *For projects at or above 1.5 million square feet of floor area:* The BPDA shall, as part of project review, recommend the incorporation of a District Energy Microgrid and preparation of a District Energy Microgrid Master Plan for the entire development. For projects that are primarily residential, complying may entail cooperation with a service provider that can sub-meter individual resident units. If the BPDA determines that it is not feasible to build the full District Energy Microgrid as part of the initial project phase or phases, all initial phases of the project should nevertheless be designed and constructed to be District Energy Microgrid Ready. In this way, when the full District Energy Microgrid becomes feasible, all buildings that were built during the initial phase or phases can be easily connected to the District Energy Microgrid system with minimal cost and disruption. If a District Energy Microgrid is not incorporated into the project plan, the project proponent should demonstrate to the BPDA and other City departments, including but not limited to the Public Improvement Commission ("PIC"), the Boston Water and Sewer Commission ("BWSC"), and the Environment Department, how other technologies to be incorporated into the project offer comparable or superior benefits in terms of energy supply resiliency, reduced energy use, reduced GHG emissions, cost reductions to utility customers, and limited impacts on the public way--such as street disruptions and redundant construction-- as compared to the benefits quantified in the District Energy Microgrid Master Plan. If, at a later date, the project proponent wishes to amend the approved Article 80 development plans, the corresponding District Energy Microgrid Master Plan must also be amended to reflect any changes in project phasing, configuration, land use mix, and/or intensity of use.
- *For projects at or above 1.5 million square feet of floor area, and/or adding or altering road surface in excess of .5 miles of roadway:* The BPDA and PIC shall, as part of their project review, recommend the incorporation of a Telecommunications Utilidor. If a Telecommunications Utilidor is not incorporated into the project plan, the project proponent shall demonstrate to the BPDA and PIC how other technologies to be incorporated into the project will provide comparable or superior benefits in terms of mitigating and/or reducing street disruptions, yielding more efficient use of underground space, and promoting more equitable access to telecommunications infrastructure.

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For a list of defined terms employed in this draft policy, please confer with BPDA staff.



- *For all projects at or above 100,000 square feet of floor area:* The BPDA shall recommend the use of Green Infrastructure to retain, on site, a volume of runoff equal to 1.5 inches of rainfall times the total impervious area, prior to discharge, and in compliance with any applicable BWSC stormwater mitigation requirements.
- *For Projects satisfying other threshold criteria:* For all projects where the BTM requires that traffic signals be installed, or where traffic signal phasing and timing changes are required due to traffic mitigation, the BPDA shall recommend the incorporation of Adaptive Signal Technology and any related components into the traffic signal system network, consistent with any applicable BTM standards or guidelines.

For all projects making right-of-way improvements which are responsible for street light installation or a contribution toward the same, BPDA shall recommend that all street lights include additional electrical connection and fiber optic service, consistent with any applicable PWD standards or guidelines.

*Timing in the Article 80 Process*

- A. With the Project Notification Form (“PNF”), Notice of Project Change (“NPC”), or other initial filing, provide documentation of the integration of applicable SUTs into the design and planning of the project via diagrams, plans, analyses and descriptions deemed necessary by the Director of the BPDA. Describe all immediate and long-term planning, design, and construction strategies that will be employed to avoid, eliminate, or mitigate the adverse impacts of utility construction. Consideration of SUTs should not be limited to those described in the *Smart Utility Standards*.
- B. Incorporate *Smart Utility Standards* into all relevant components of the project, including building, site, infrastructure, transportation, environmental protection, urban design, landscape, sustainable development, historic resources, and tidelands.
- C. With the Design / Building Permit filing, the project proponent shall also submit to the BPDA updated documentation of the integration of applicable technologies along with supporting analysis and document the strategies that will be employed to integrate SUTs.
- D. With the Construction / Certificate of Occupancy filing and final inspection, the project proponent shall submit documentation to the relevant City agencies of the integration of applicable technologies along with supporting analysis and document the strategies that will be employed to integrate SUTs.

## MEMORANDUM

**TO:** Tim Czerwienski, Project Manager  
**FROM:** Richard McGuinness, Deputy Director for Climate Change and Environmental Planning  
Katie Pedersen, Senior Land Use Planner, Sustainability Specialist and Environmental Review  
Chris Busch, Senior Waterfront Planner  
John Dalzell, Senior Architect  
**DATE:** February 21, 2018  
**SUBJECT:** Suffolk Downs Redevelopment - **Environmental & Climate Change Comments**

### **Environmental Analysis**

A thorough understanding of the microclimate is integral to understanding how best to maximize the strengths and overcome the limitations of a site. Adapting building designs to existing site conditions and the natural features can greatly reduce the potential adverse environmental impacts. The quality and success of open spaces are dependent on many factors, including pedestrian comfort.

A climate analysis shall be performed based on the master site plan massing, height, densities, grids, blocks and open spaces.

The pedestrian level wind impacts and new shadows created shall be assessed on a phase by phase basis, as each is dependent upon building height, massing, and location, as well as the immediately surrounding uses.

### **Shadow**

A shadow analysis shall be required to be conducted and the results included in the submission of each subsequent phase for existing (No-Build) and future (Build) conditions, for the hours of 9:00 a.m., 12:00 noon, and 3:00 p.m. for the vernal equinox, summer solstice, autumnal equinox and winter solstice and for 6:00 p.m. during the summer and fall.

1. No-Build-The existing site conditions to establish a baseline condition
2. Full Build-Master Site Plan (as described in the EPNF)
3. Build Condition-The proposed initial phase (each subsequent phase shall be required to conduct)

#### 4. As-of-Right Build Alternative

Net new shadows shall have a clear graphic distinction and for purposes of clarity, new shadows shall be shown in a dark, contrasting tone distinguishable from the existing shadows. The shadow impact analysis shall include the existing shadow and incremental effects of the project on existing and proposed open spaces, plazas, park areas, sidewalks, pedestrian areas and walkways, adjacent to, and in the vicinity of the project, including but not limited to the Belle Isle Marsh. If deemed necessary, design or other mitigation measures to minimize or avoid any adverse shadow impacts must be identified and described.

The shadow analysis results shall be provided in both animation and graphic representations, so as to best understand the extent to which shadows from the project are anticipated to affect the overall shadow conditions both on the project site as well as within the surrounding area.

#### **Wind**

The submission of each subsequent phase will require that either a qualitative or quantitative analysis shall be conducted (determination based on phase building details) and the results included in the filing.

The analysis shall determine the suitability of particular locations for various activities (e.g., walking, sitting, eating, etc.) as appropriate. Particular attention shall be given to public and other areas of pedestrian use, including, but not limited to, entrances to the project buildings and adjacent buildings, sidewalks, and parks, including but not limited to the Belle Isle Marsh, plazas, and other open spaces and pedestrian areas near the project.

The analysis shall evaluate the following conditions:

1. No-Build-The existing site conditions to establish a baseline condition
2. Full Build-Master Site Plan (as described in the EPNF)
3. Build Condition-The proposed initial phase (each subsequent phase shall be required to conduct)
4. As-of-Right Build Alternative

The wind tunnel testing shall be conducted in accordance with the following guidelines and criteria:

1. The analysis shall include the mean velocity exceeded 1% of the time and the effective gust velocity exceeded 1% of the time.

2. Wind direction shall include sixteen compass points. Data shall include the percent or probability of occurrence from each direction on seasonal and annual bases.
3. Results of the wind tunnel testing shall be presented in miles per hour (mph).
4. Velocities shall be measured at a scale equivalent to an average height of 4.5-5 feet.
5. The model scale shall be such that it matches the simulated earth's boundary and shall include all buildings within at least 1,600 feet of the Master Plan Project site. All buildings taller than 25 stories and within 2,400 feet of the Master Plan Project site should be placed at the appropriate location upstream of the site during the test. The model shall include all buildings recently completed, under construction, and planned within 1,500-2,000 feet of the project site. Prior to testing, the model shall be reviewed by the Boston Planning and Development Agency (BPDA). Photographs of the area model shall be included in the written report.
6. The written report shall include an analysis which compares mean and effective gust velocities on annual and seasonal bases, for No-Build and Build Conditions and shall provide a descriptive analysis of the wind environment and impacts for each sensor point, including such items as the sources of the winds, direction, seasonal variations, etc., as applicable. The report shall also include an analysis of the suitability of locations for various activities (walking, sitting, standing, etc.) as appropriate, in accordance with the recognized criteria Melbourne or Lawson comfort categories, or equivalent).
7. The pedestrian level wind impact analysis report shall include, at a minimum, the following maps and tables:
  - \*Maps indicating the location of the wind impact sensors, for the existing (No-Build) condition and future build scenario(s).
  - \*Maps indicating mean and effective gust wind speeds at each sensor location, for the existing (No-Build) condition and each future build scenario, on an annual basis and seasonally. Dangerous and unacceptable locations shall be highlighted.
  - \*Maps indicating the suitability of each sensor location for various pedestrian-related activities (comfort categories), for existing (No-Build) condition and each future build scenario, on an annual basis and seasonally. To facilitate comparison, comfort categories may be distinguished through color coding or other appropriate means.
  - \*Tables indicating mean and effective gust wind speeds and comfort category at each sensor location, for the existing (No-Build) condition and for each future build scenario, on an annual basis and seasonally.
  - \*Tables indicating the percentage of wind from each of the sixteen compass points at each sensor location, for the existing (No-Build) condition and for each future build scenario, on an annual basis and seasonally.

## **Noise**

With each subsequent phase submission, the Proponent shall be required to conduct a noise assessment to analyze the potential noise impacts that may occur during construction and as well as during the subsequent occupancy/operation of the project. The noise assessment shall include monitoring of the existing sound levels as well as calculations of future sound levels associated with the project's mechanical equipment including, but not limited to, exhaust fans, cooling towers and emergency generators. Additionally, an evaluation of the study area shall identify sensitive receptor locations and locations with outdoor activities which may be sensitive to noise associated with the project. During the early stages of the design process, specific technical specifications of mechanical equipment may not be available and thus the manufacturer's sound level data for mechanical equipment shall be substituted. Reference sound levels for the exhaust systems shall be based on data of equipment of similar type and size.

The Proponent shall be required to demonstrate that the project complies with all applicable City of Boston, Massachusetts, and Federal (including Housing and Urban Development noise standards) regulations and guidelines.

## **Solar Glare**

A solar glare analysis shall not be required at this time. However, for each subsequent phase, if the design includes the use of reflective coated glass or other highly reflective materials, the Proponent shall be required to conduct an analysis of the potential solar glare impact on streets, public open spaces and pedestrian areas, to assess the potential for the creation of visual impairment or discomfort due to reflective spot glare and an analysis of the potential for solar heat buildup in any nearby buildings receiving reflective sunlight from the project shall also be conducted. If deemed necessary, mitigation measures designed to eliminate any adverse reflective glare shall be identified and described.

## **Air Quality**

The BPDA requires that project-induced impacts to ambient air quality be addressed. Thus, an air quality analysis shall be conducted to determine the impact of pollutant emissions from combustion and mobile source emissions generated by the project.

The Proponent shall be required to conduct a microscale analysis to determine the effect of project generated traffic on air quality. Thus, the Proponent shall be required to analyze local effects of the potential increase in traffic on ambient air quality near specific roadway intersections. This microscale analysis is required at intersections where (1) Project traffic would impact intersections or roadway links currently operating at LOS D, E, or F or would cause LOS to decline to D, E, or F, (2) Project traffic would increase traffic volumes on

nearby roadways by 10% or more (unless the increase in traffic volume is less than 100 vehicles per hour) or (3) the project will generate 3,000 or more new average daily trips on roadways providing access to a single location.

The microscale analysis involves modeling CO emissions from vehicles idling at and traveling through both signalized and unsignalized intersections. Predicted ambient concentrations of CO for the build and no-build cases are compared with federal (and state) ambient air quality standards for CO.

The Proponent shall be required to include in the submission of subsequent phases (if deemed applicable) a microscale analysis to conduct a cumulative impact analysis for comparison to the NAAQS for SO<sub>2</sub>, NO<sub>x</sub>, PM-10, and PM-2.5. This analysis shall address emissions from the project's heating boilers, emergency generators, cooling towers, etc. Worst case maximum predicted impacts from these source groups shall be added to monitored background values obtained from MassDEP and compared to the NAAQS.

The Proponent shall be required to conduct a stationary source analysis to ensure that the project will not adversely impact air quality in the area. The stationary sources that may contribute to impacts are typically combustion sources such as heating boilers, emergency generators, cooling towers, and garage vents.

### **Solid and Hazardous Wastes**

With the submission of each subsequent phase, the Proponent shall be required to provide a comprehensive list and description of any known or potential hazardous wastes or contaminants on the project site, together with a description of the proposed remediation measures to ensure their safe removal and disposal, pursuant to M.G.L. Chapter 21E and the Massachusetts Contingency Plan. Any potential hazardous wastes to be generated by the project must be identified. The existence of underground storage tanks ("USTs") and above ground storage tanks ("ASTs") on the project site shall be identified as well. Potential waste generation must be estimated and plans for disposal indicated. Additionally, if applicable, the Proponent shall be required to provide a comprehensive description of the on-site storage, the process for determining the extent of the contamination, disposal options, and measures to ensure the safe transfer of material to disposal sites.

### **Climate Change Resiliency & Green Buildings**

#### **Green Buildings**

Green buildings promote vibrant communities, reduce site impacts, save water, energy, and natural resources, and support human health and wellbeing. The Proponent should establish a long term sustainability plan that includes a green building commitment of LEED Gold or better for the majority of all buildings with numerous buildings achieving

LEED Platinum and no more than equal number of buildings achieving LEED Silver or better. The Proponent should provide an updated green building strategy including LEED outcome commitments as a percentage of all buildings and over the full build out time frame.

The current filing commits both Phase 1 buildings to using the LEED v4 Rating System and achieving LEED Gold. Both the rating system selection and outcome are accepted. Given the scale of the project, multitude of buildings, and impact on the surrounding neighborhood, the project should also utilize the LEED for Neighborhood Development (LEED ND) rating system and achieve LEED ND Gold or better. Please provide a LEED ND Checklist and supporting narrative. The LEED Master Site or Campus approach is appropriate and acceptable for demonstrating Article 37 compliance for individual buildings. The proponent is encouraged to use additional rating systems that demonstrate and ensure leadership in practice including SITES, PEER, and others.

At the initiation of development review and coinciding with start of building urban design review for each individual building, the Proponent is to provide a complete Article 37 Green Building “Initial Filing” specific to the building and an updated Climate Resiliency Checklist. As building planning progresses, the Proponent is to provide an Article 37 Design / Building Permit and Construction / Certificate of Occupancy Filings in accordance with the Boston Zoning Code Article 37 Green Buildings and Climate Resiliency Review Procedures and Submittal Requirements. Building specific submissions must be provided for each building. Please review [Article 37 Green Building and Climate Resiliency Guidelines](#) and utilize the most current [Review Procedures and Submittal Requirements](#).

Reducing greenhouse gas emissions (“GHG”) is critical to avoiding more extreme climate change conditions. Mayor Martin J. Walsh has set a goal for Boston to be carbon neutral by 2050. The entire development and all new buildings should be planned and designed to minimize GHG emissions and include future adaptation strategies to further reduce GHG emissions. The long term phasing of the project should be reflected in both general and building specific GHG emission reduction commitments that progressively increase over the duration of the buildout. Initial building designs should, at minimum, target low carbon performance and anticipate future adaptations actions for achieving net zero and net positive carbon performance. Later phase buildings should achieve net zero carbon performance.

Following are specific sustainable development and green building comments and questions in response to section 3.4.1 Phase 1 Project and section 3.4.2 Master Plan Project Sustainable Design Strategies:

**Integrative Process:**

Please provide additional information on the integrative approach to site and building planning, design, and delivery including charrettes, collaboration platforms,

and key participants. Additionally, how will the project team maintain an integrative approach over the full phasing of the development?

**Location and Transportation:**

Promote and support everyday active living and travel including a range of walking and bicycling options, public transit, and reduced personal vehicle travel. Include outdoor and indoor active stairs for vertical circulation, easily accessible, secure and enclosed bicycle storage space, shared parking, transit pass programs, and car share programs. Assess existing and planned uses to insure new residents and workers have easy access to key necessities (e.g. groceries, pharmacy) as well as a wide range of diverse uses.

**Sustainable Sites:**

Prioritize green infrastructure solutions and best practices for management of stormwater, heat island, wind, and noise impacts. Assess the potential use of existing, new, or expanded water features for full or partial treatment, retention, and management of on-site stormwater. Analyze site planning, building design, landscape design, shade structures, and tree plantings to optimize shading of paved and hardscape surfaces to limit heat island conditions and insure the project achieves exemplary performance. See related Urban Design site planning comments.

Please provide an outline of proposed Tenant Design Guidelines including minimum performance requirements for GHG emission and water use reductions, preferred practice incentives, and aspirational goals.

**Water Efficiency:**

Further assess opportunities for rainwater harvesting for building cooling systems make up water and to further reduce landscape irrigation.

**Energy and Atmosphere:**

Minimize GHG emissions with a priority on passive building strategies. Residential and commercial buildings should strive to reduce GHG emission 15% below the emissions levels of comparable buildings meeting standard minimum practice. Strategies should at minimum include the following:

- Passive building strategies should include: building orientation and massing; high performance building envelopes that are airtight, well insulated, and include high efficiency windows and doors; and natural ventilation and daylighting.

Active building strategies should include: Energy Star high efficiency appliances and building heating, cooling, and hot water systems sized to meet, but not exceed, occupant needs; and high efficiency LED lighting fixtures and advanced lighting control systems and technologies.



- **Renewable, Clean Energy Sources and Storage:** Include and maximize the potential for onsite solar PV including building integrated PV, and rooftop and shade structure arrays. Additionally, clean energy (e.g. combined heat and power), electric battery, and thermal energy storage systems should be assessed for inclusion.
- **Energy Efficiency Incentives:** Fully utilize federal, state, and utility energy efficiency and renewable energy programs. The proposal describe supporting programs.
- **Analysis:** Whole building energy modeling should be employed at the earliest phases site planning and building design and utilized to establish base and design case carbon emission profiles.

**Materials Selection:**

Include sustainably harvested and responsibly processed materials and products made with recycled and reclaimed materials; materials and products from responsibly harvested and rapidly renewable sources; and locally sourced products and materials (within 500 miles).

**Indoor Environmental Quality:**

Tenant demand and market value for high quality healthy indoor environments continues to grow. In addition to the construction practices and system strategies noted consider including extended roof overhangs and proper ground surface drainage to reduce building moisture problems; passive fresh air systems and active ventilation at moisture and combustion sources; active indoor CO2 monitoring; and ensure fresh air intake points are not compromised by point or mobile emission sources. Ensure building products and construction materials are free of VOC's, toxins, hazardous chemicals, pollutants and other contaminants; entryway walk-off mats and smooth floors that reduce the presence of asthma triggers, allergens and respiratory irritants; and easily cleaned and maintained finishes.

**Innovation:**

Utilize both "off-the-shelf" products and practices as well as innovative strategies and "cutting edge" products to increase the sustainability and performance of the building.

Suffolk Downs should identify and include innovative strategies and products for engaging residents and occupants in ongoing monitoring of energy and water use, waste generation, emissions by travel modes, and overall environmental stewardship.

**Climate Change**

As referenced in the Suffolk Downs Redevelopment (the “Project”) Expanded Project Notification Form (EPNF) goals and objectives, the Project provides a unique opportunity to integrate resilient design strategies at the building and district scale and establish Suffolk Downs as a climate resilient district. Resiliency measures implemented as Suffolk Downs is built out can assist to prevent and limit impacts from climate hazards, ensuring building occupant safety, continuity of building tenant business operations, improved building service life and value, and serve to protect portions of the larger East Boston and Revere communities.

Section 3.6 of the EPNF, “Climate Change Preparedness and Resiliency,” recognizes the climate hazards the Project site will be subject to, as well as preliminary project resiliency measures. Measures include a network of open spaces strategically designed to accommodate potential flooding impacts associated with sea level rise to protect buildings and areas outside the Project site, the elevation of buildings and incorporation of resilient design measures, and use of site elevations and landscaping to contend with increased heat and precipitation. Given the Project’s size and time horizon for full build-out, the Proponent should consult with appropriate BPDA and City of Boston Environment Department staff in advance of each project phase regarding the most current City climate policies and directives. Since climate science, modeling, data, and understanding of climate hazard risks will advance over time, the Proponent should be prepared to modify site and building design to respond to our evolving understanding of these risks and hazards.

The most significant current and future climate risk for the Project is coastal and inland flooding due to the complex and dynamic hydrologic features of the site and surrounding area. The proponent should be commended for responding to the sea level rise elevation data in the Climate Ready Boston report and the BPDA Sea Level Rise Flood Hazard Area Mapping Tool. Given the size, scale, and time horizon for build-out, and useful life of buildings constructed on the site, the proponent should engage a coastal engineering design firm to develop a dynamic flood model specific to the Project site and surrounding area and review inundation scenarios through 2100 utilizing MassDOT Boston Harbor Flood Risk Model (BH-FRM) data. The analysis should define flood pathway vulnerabilities, as well as when and where flood waters are anticipated to enter onto portions of the property. This analysis will better prioritize site phasing and inform site elevation datum for buildings, roads, utilities and open space.

The Proponent has indicated portions of the permanent roadway constructed with the Phase 1 Project will be designed with a minimum top of curb elevation of 20.83 feet, specifying the elevation is 40-inches above the 100-year FEMA flood elevation. For purposes of assessing sea level rise resiliency measures FEMA datum should not be used as FEMA base flood elevations are determined based upon historic storms of record and do not incorporate future sea level rise conditions. Data and elevations from the MassDOT BH-FRM should be utilized for such analysis.

The EPNF also notes 12 inches of freeboard will be added to the base floor elevation of the buildings to account for localized storm surges resulting in a Finished Floor Elevation of 22 feet BCB. This elevation datum will greatly assist in reducing impacts from coastal flood conditions and is consistent with the BPDA's Sea Level Rise Flood Hazard Area Mapping which indicates 2070 sea level rise flood elevations for the area 19.3 to 19.5 BCB. The 22-foot elevation also addresses BPDA freeboard guidance of an additional 12 inches of freeboard for all buildings and 24 inches of freeboard for any critical facilities and infrastructure, and ground floor residential uses. The BPDA Mapping Tool and 40-inch sea level rise forecast does not represent a worst case sea level rise scenario. The Proponent is encouraged to evaluate their own tolerance for risk given the specifics of the Project site, location, and uses to determine what flood hazard mitigation and prevention measures should be incorporated into their Project.

As the Project will be functional through 2100, and given further anticipated increases in sea level rise beyond the end of the century, the Proponent should review options for designing flexibility into new buildings and public realm infrastructure to accommodate future changes in the extent of climate hazards. Such design measures could include allowing greater floor to ceiling height on ground floors to allow for additional ground floor elevation, or designing the second floor as a possible, future first floor to accommodate potential increases in area grade elevation.

Climate Ready Boston (CRB) advances a resiliency strategy for the City that involves redundancy and layers of resilient infrastructure. The on-site resiliency measures referenced in the EPNF may function to protect the Project site; however, the size and scale of the Project make it vulnerable to failures of surrounding infrastructure and transportation that could be compromised in flood events. The CRB report notes the East Boston community has the most land area of all Boston's neighborhoods exposed to coastal storms in the future. The Proponent should evaluate the feasibility of developing flood control measures beyond the Project area to critical utility and transportation infrastructure that serves the Project. Data and modeling provided through the dynamic flood modeling for the site referenced above could be used to conduct a feasibility analysis of district-level flood protection interventions. Such an evaluation should review shoreline protective measures to the east of the site along the bounds of the Belle Isle Marsh or elevation of Bennington Street, which would protect the street, the MBTA Blue Line right of way and stations and the Project site. Elevation of Route 1A to the west of the Project site would also function to block flood waters from the Chelsea Creek from entering the property. At a minimum the Proponent should review opportunities to incorporate adaptation and flood prevention measures which would protect the Project site and surrounding community.

To address extreme precipitation the EPNF indicates the Project area's stormwater management system will be designed to convey a 6-inch storm-event and the 8.8-inch

storm event as recommended by the BWSC. The EPNF notes the stormwater infrastructure system will be designed to maintain peak runoff rates up to and including the 100-year storm event to ensure that flow is not increased to the Bennington Street pump station. Stormwater infrastructure should also respond to the changing nature of precipitation with climate change including storm events that are shorter in duration with heavier volumes of rain. To help BMPs continue to function under these changing conditions, the BMP design should incorporate structures, plants, or materials that are adaptable.

The Proponent should provide analysis of how onsite infrastructure will function in coordination with stormwater flows being conveyed by the Sales Creek which serves as a primary floodway for a substantial urban watershed within Revere. Although on-site infrastructure may be designed to manage large future design storms, as precipitation levels increase with a changing climate, greater flows will also be generated from the Sales Creek Revere watershed. Stormwater conveyance from the site is also controlled by the MA Department of Conservation and Recreation's (DCR) Bennington Street tide gate and stormwater pumping station. Analysis should be provided of how the tide gate and pump station will function with future stormwater flows and rising tide and sea level conditions to prevent onsite flooding. The proponent should work with the DCR to review the pump station's capacity and vulnerabilities to future sea level rise, coastal storm events and increased precipitation levels. As the tide gate/pumping station is crucial to the management of flood waters on the Project site, the Proponent should address how the Project can support the long-term maintenance and management of the facility.

Open space resources, tree canopy, and building materials should also be evaluated and discussed in relation to mitigating heat island effect and managing extreme precipitation events and stormwater. A robust and extensive tree planting program, aligned with the goals of Urban Forestry, should be included in the Project design, as the Urban Forest is an important part of the City's landscape. It is made up of all the public trees in Boston, along with the City's shrubs, grasses, ground cover, soil, and waterways. The Urban Forest serves an important stormwater management function by intercepting rainfall that would otherwise run off of paved surfaces and be transported into local waters through the storm drainage system, picking up various pollutants along the way. The Urban Forest also reduces the urban heat island effect, reduces heating/cooling costs, lowers air temperatures, reduces air pollution, increases property values, provides wildlife habitat, and provides aesthetic and community benefits such as improved quality of life. Tree and planting species selected for the site should with consideration to a changing climate with more frequent periods of drought, extreme heat and precipitation.

### **Sea Level Rise Flood Protections Offsite**

The Proponent is relying on Blue Line capacity for a substantial portion of their mode share. Due to flooding risks of the Blue Line in this area, how will the Proponent provide for protection of this leg of the Blue Line from flooding?

## **Open Space and Public Realm**

The City of Boston and Massport have invested over \$8.5 million in the East Boston Greenway over the last few years, extending the Greenway by one mile and connecting the neighborhood's centerpiece open space including Piers Park, Bremen Street Park, and Wood Island Marsh to Constitution Beach. These improvements were completed in partnership with DCR and MBTA. The East Boston Greenway is a critical pedestrian and bicycle route for the neighborhood and envisioned to connect to Belle Isle Marsh and beyond. The Proponent should explore opportunities to invest in offsite open space, pedestrian, and bicycle networks to integrate Suffolk Downs into the neighborhoods of East Boston and Revere. The regional benefits of connecting DCR parkland and reservations including Revere Beach, Belle Isle Marsh, and Constitution Beach would be dramatic.

The East Boston Greenway has only two roadway crossings as it stretches from Piers Park to Constitution Beach, a remarkable feat for an urban area. The ease of bicycle connectivity is conducive to a strong bicycle mode for the project if the Greenway were linked to Suffolk Downs.

The BPDA is very encouraged by the generous open space provided in the project plan. This acreage will benefit those who work and live in and around the project area. It will also provide positive environmental benefits including stormwater control and containment, and reducing heat island effect. We ask the proponent to consider a mix of open space design that is a mix of passive and active. New residents and employees of the project area and the abutting neighbors would benefit from active recreation in addition to passive parks. This feedback is underscored by many of the comments and observations provided during the project planning workshops last year. See the Boston Parks and Recreation Department's letter for more on active and passive recreation spaces.

## **Planning and Design**

We applaud the Proponent for its forward-thinking planning and the possibility of integrating nearby fuel terminals into the project area in the long-term. We encourage the proponent to look beyond McClellan Highway to the Chelsea Creek for possible public connections to the water's edge

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

## **RE: Scoping Comments for Suffolk Downs Redevelopment**

Dear Mr. Czerwienski:

The redevelopment of Suffolk Downs presents a unique opportunity to create a new neighborhood, and it is my hope that this new neighborhood is one that can meet the housing needs of a range of incomes and household types, helping to create a vibrant and diverse urban village. In meeting this broad vision, there are goals and tools that I believe HYM should implement as part of the overall development plan.

### **Overall Affordability**

HYM should strive to include more income restricted housing than is required under the current Inclusionary Development Policy (“IDP”). By making this request, please note the following:

- Approximately fifteen percent of East Boston’s housing is income restricted, and nineteen percent of Boston’s housing is income restricted. Exceeding thirteen percent will help to make Suffolk Downs more similar to Boston as a whole in terms of income restricted housing, providing housing for a broad range of incomes.
- The BPDA will be reviewing the IDP over the next year, and it is expected that there will be changes to the policy that will increase the level of affordability requested of developers. In this respect, HYM should be considering how it might meet future affordability requirements.

Even though the redevelopment of Suffolk Downs will require substantial infrastructure investments, and sales prices and rents are not as high as in downtown neighborhoods, I do think it is feasible to achieve more than thirteen percent income restricted across the development site. On some parcels, a small increase in affordability may be attainable using private financing. In other cases, a more substantial increase in affordability may require more creativity and alternate funding sources. For example, HYM should consider using public- and quasi-public financing, such as the financing available from MassHousing, the Massachusetts Housing Investment Corporation, and/or the Massachusetts Housing Partnership to create so called “80/20” projects. These projects could be feasible without additional public subsidies, or could be assisted with four percent, federal Low Income Housing Tax Credits, or some of the workforce housing funds available through MassHousing.

HYM should also consider the model that was used effectively at the Beverly, near North Station. This model included low-income units funded and financed through traditional, public affordable housing sources, middle-income units funded by private development through the IDP, and voluntarily income-restricted units for upper middle-income households.

### **Serving a Range of Household Types**

HYM should strive to create a true urban village, with housing geared to a variety of needs and household types. In particular, HYM should be thoughtful and creative about ways to meet the following needs as part of the overall housing plan:

- Smaller homes for singles, couples, and small families: The City of Boston is creating new guidelines for smaller units. These “Compact Living” units are smaller units that use space efficiently, and are located in buildings that also provide common/amenity spaces. One goal of this effort is to provide homes at a lower price than larger, market-rate units. Such units can serve a variety of types, especially younger individuals and couples, or downsizing empty-nesters. Where these units are condominiums, they can help provide another option for first-time homebuyers who are finding it difficult to find a home.
- Homeownership Opportunities: A significant percentage of units at the development site should be homeownership units, so as to provide wealth building opportunities for Boston residents, and to increase the overall stability of the neighborhood. Currently, thirty-five percent of Boston households are homeowners. I encourage you to strive for such a percentage at Suffolk Downs.
- Housing for Older Adults: In the 2014 *Housing a Changing City: Boston 2030* plan, the City set a goal of creating 5,000 new housing units for seniors, of which 1,500 would be for low-income households. In part because of the disappearance of the Federal 202 program, meeting these goals have been the greatest challenge to implementing the housing plan. While some seniors are seeking condominiums and rentals in mixed-age properties, the need for age specific housing is important, and I am heartened by HYM’s interest in providing housing that is targeted to the 55+ demographic.

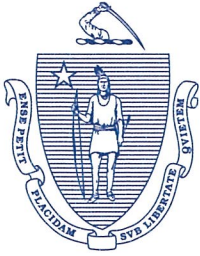
In closing, I wish to reiterate the overarching goal—to create a true urban village that meets the needs of a range of household incomes and types. I look forward to continuing the dialog about how such results can be achieved.

Sincerely,



Tim Davis  
Housing Policy Manager





COMMONWEALTH OF MASSACHUSETTS  
**THE GENERAL COURT**  
STATE HOUSE, BOSTON 02133-1053

BRA

January 10, 2018

'18 JAN 22 PM4:20:55

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

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

Dear Director Golden:

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

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

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

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<sup>1</sup> Over fifty percent of East Boston's population is Latino.



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

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

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

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

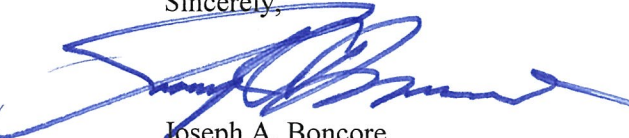
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<sup>2</sup> Homes that have the lowest possible energy use and ecological footprint


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

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

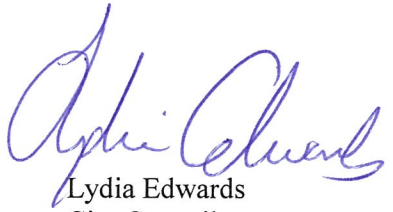
Sincerely,



Joseph A. Boncore  
State Senator  
First Suffolk and Middlesex



Adrian Madaro  
State Representative  
First Suffolk



Lydia Edwards  
City Councilor  
District One

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

# BOSTON

Martin J. Walsh, Mayor

February 2, 2018

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

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

Dear Ms. Polhemus:

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

## **Belle Isle Marsh Reservation**

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

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

## **Open Space**

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

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

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



**Boston Parks and Recreation Department**

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

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

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

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

## **Development Programs**

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

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

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

## **Needs Analysis**

East Boston is underserved by public parks suitable for active recreation with a ratio of 1.31 acres per 1000 residents of parks, playgrounds and athletic fields. This is less than the city average of 3.24 acres per 1000 residents.<sup>1</sup> Mayor Walsh endorsed the Trust for Public Land's "Ten Minute Campaign" to ensure that all residents live within a 10 minute walk of a public park. The adjacent Orient Heights neighborhood is an area of particular need as identified by the Trust for Public Land<sup>2</sup> and the City's *Open Space and Recreation Plan*.<sup>3</sup>

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

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

<sup>2</sup> Trust for Public Land, Park Score Evaluator: Boston

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

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

### **Impact Assessment**

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

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

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

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

### **Public Benefits for Landlocked Tidelands**

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

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

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

### **Open Space Mitigation in the PDA**

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

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

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

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

### **Protection in Perpetuity**

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

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

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

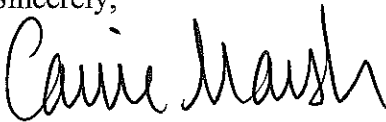
### **Open Space in Phase I**

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

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

Thank you for your consideration of the above.

Sincerely,



Carrie Marsh, Executive Secretary  
Boston Parks and Recreation Commission

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



**Boston Water and  
Sewer Commission**



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

January 4, 2018

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

And

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

Re: Suffolk Downs Redevelopment Project  
East Boston and Revere

Dear Secretary Beaton and Mr. Czerwienski:

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

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

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



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

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

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

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

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

#### General

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





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

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



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

#### Water

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





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

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

#### Sewage / Drainage

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



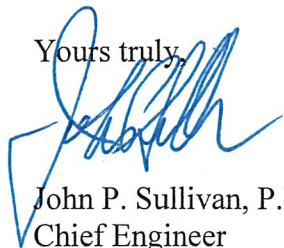
4. Developers of projects involving disturbances of land of one acre or more will be required to obtain an NPDES General Permit for Construction from the Environmental Protection Agency and the Massachusetts Department of Environmental Protection. HYM/MHDC is responsible for determining if such a permit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



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

Thank you for the opportunity to comment on this project.

Yours truly,



John P. Sullivan, P.E.  
Chief Engineer

JPS/ra

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

**APPENDIX B**  
COMMENTS FROM THE GENERAL PUBLIC





Are you on board?

15 State Street, Suite 1100  
Boston, MA 02109  
617.223.8671  
[bostonharbornow.org](http://bostonharbornow.org)

January 30, 2018

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

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

Re: Suffolk Downs Redevelopment, EPNF

Dear Director Golden,

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

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

#### Project description

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

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

#### Phase 1 Waiver

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

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

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

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

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

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

#### Environmental Protection and Preservation

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

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

One of our predecessor organizations (The Boston Harbor Association) worked closely with the Saugus River Watershed Council to educate the community and advance the long-term objectives of the Rumney Marsh ACEC designation<sup>1</sup>. Section 4.4.6 of the EPNF points to the Marsh as a "heavily disturbed" area due to previous onsite activities. We understand the history of activities on the site may have heavily disturbed the natural habitat. These salt marshes are still vitally important to the surrounding areas, partially due to their capacity to provide flood water storage and prevent flood damage. Boston Harbor Now is particularly interested in understanding the proponent's mitigation plans to address the existing disturbances and restore portions of this environmentally valuable natural resource.

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



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

#### Public Access and Transportation

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

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

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

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

#### Climate Change

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

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

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

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

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

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

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

Thank you for your time and consideration.

Sincerely,

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

Jill Valdes Horwood  
Director of Policy



January 25, 2018

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

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

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

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

Dear Mayor Arrigo, Secretary Beaton and Director Golden:

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

Leveraging connections between walkability and transit

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

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

**MAKING MASSACHUSETTS MORE WALKABLE**

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

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

#### Exploring opportunities to reduce single occupancy vehicle trips and parking spaces

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

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

#### Exploring opportunities for bus/shuttle connectivity and related pedestrian access

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

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

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

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

#### Creating a walkable project site that meets Complete Streets standards

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

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

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

Improving pedestrian safety throughout the project study area

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

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

Sincerely,



Wendy Landman  
Executive Director

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



February 2, 2018

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

**RE: Suffolk Downs Redevelopment Master Plan**

Dear Mr. Czerwienski:

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

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

#### Expedited Review Concerns

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

**GreenRoots • RaicesVerdes**  
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617.466.3076 • [www.GreenRootsChelsea.org](http://www.GreenRootsChelsea.org)

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

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

### Housing Impacts

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

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



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

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

#### Environmental Justice/Enhanced Outreach

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

#### Land Uses & Community Impacts

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

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

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

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

### Building Massing

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

### Technical Capacity

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

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

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

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

Sincerely,

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

John Walkey  
Waterfront Initiative Coordinator  
GreenRoots

[Redacted contact information]

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

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

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

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

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



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

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



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

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## Suffolk Down Proposal - East Boston resident

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

Tue, Jan 2, 2018 at 2:07 PM

Hi Tim,

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

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

My thoughts are below:

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

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

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

Thank you for your time

Melissa



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

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## Project Comment Submission: Suffolk Downs

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

Thu, Feb 1, 2018 at 7:02 PM

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

CommentsSubmissionFormID: 2645

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

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

Document Name: Suffolk Downs

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

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

First Name: John

Last Name: Murphy

Organization:

Email: [REDACTED]

Street Address: [289 Endicott Avenue](#)

Address Line 2:

City: Revere

State: MA

Phone: [REDACTED]

Zip: 02151

Opinion: Support

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

[Quoted text hidden]



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

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## Suffolk Downs Redevelopment

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Hector Conde [REDACTED]  
To: tim.czerwienski@boston.gov  
Cc: Claudia Sierra [REDACTED]

Fri, Feb 2, 2018 at 12:03 AM

Hola buenas noches

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

PORQUE?

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

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

Gracias

Hector M Conde  
Liason Boston  
Colombian Cultural Committee of Merrimack Valley  
[www.cccmv.org](http://www.cccmv.org)  
Sent from my iPhone



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

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## Comment for the HYM Suffolk Downs Project

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Marisa DiPietro [REDACTED]

Fri, Feb 2, 2018 at 1:25 PM

To: Development Review at the BPDA &lt;Tim.Czerwienski@boston.gov&gt;

Dear Mr. Czerwienski,

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

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

Thank you for your consideration of this request.

All the best,

Marisa

Marisa Di Pietro

Development Director

East Boston Social Centers

68 Central Square

East Boston, MA 02128

(Office) [REDACTED]

(Cell) [REDACTED]

[REDACTED]



*East Boston Social Centers, Inc.*

*Celebrating 100 years of service to the community*

*1918 ~2018*



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

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## Comments re Suffolk Downs Masterplan

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

Fri, Feb 2, 2018 at 9:33 PM

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

Re: Suffolk Downs Master Plan Comments

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

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

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

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

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

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

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

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

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

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

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

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

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

Gail Miller  
232 Orient Avenue  
East Boston, MA 02128





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

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**Re: Suffolk Downs Comment Period, Upcoming Meetings**

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

Fri, Feb 2, 2018 at 8:52 PM

Hi Tim,

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

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

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

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

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

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

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

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

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

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

Thank you for listening,  
Skip

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

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

To: undisclosed-recipients;

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

Subject: Suffolk Downs Comment Period, Upcoming Meetings

Good morning,

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

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

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

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**Tim Czerwienski, AICP**

2/5/2018

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

*Project Manager*

617.918.5303

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

One City Hall Square | Boston, MA 02201

[bostonplans.org](http://bostonplans.org)



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

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## Suffolk Downs Masterplan comments

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

Fri, Feb 2, 2018 at 11:25 PM

Hi Tim,

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

Thank you.

--

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



February 1, 2018

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

Subject: Suffolk Downs Redevelopment/Expanded PNF-ENF

Dear Mr. Czerwienski:

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

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

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

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

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

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

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

Thank you,

*John Vitagliano*

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

# Belle Isle News

Published by Friends of Belle Isle Marsh

Number 61

Summer 2000

## LOGAN NORTH—IS THIS OUR FUTURE?

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

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

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

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

### Suffolk Downs and Chapter 91

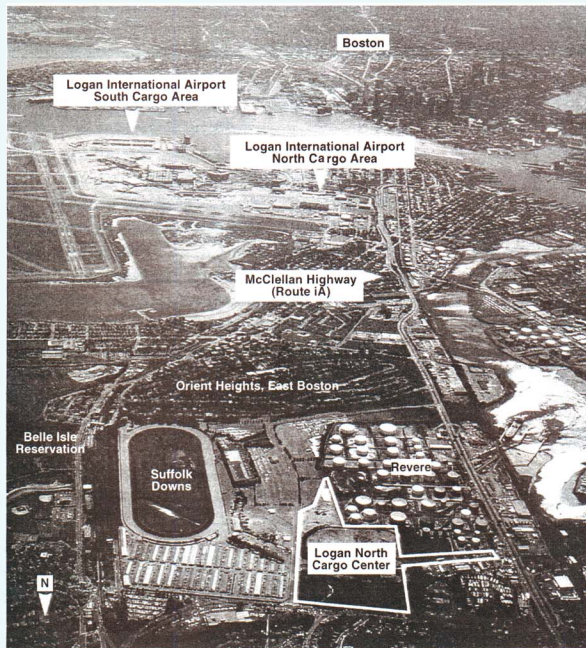
During the past several years, Suffolk Downs racing revenues have been declining. The track owners have been looking around for new sources of revenue. They have found an all-too-willing Daddy Warbucks, MassPort.

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

The exemption to Chapter 91 that Suffolk Downs offered was:

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

From the information that has been



*Continued on page 2*



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

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

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

### Park and Fly

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

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

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

### Logan North

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

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

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

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

## CORRESPONDENCE

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

Dear Representative DeLeo,

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

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

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

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

*Eleanor Casey  
President, Friends of Belle Isle Marsh*





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

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## Suffolk Downs Comment Period, Upcoming Meetings

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

Fri, Feb 2, 2018 at 10:16 PM

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

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

[Sent from Yahoo Mail for iPad](#)

[Quoted text hidden]



February 2, 2018

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

Dear Mr. Czerwienski:

I am writing to express my enthusiastic support for the Suffolk Downs Redevelopment project, for which the HYM Investment Group, LLC ("HYM") recently submitted a Project Notification Form in November 2017. The project involves the redevelopment of a 161-acre underutilized thoroughbred horse racing facility in East Boston and Revere into an active and vibrant mixed-use neighborhood.

The Suffolk Downs site was identified in the Mayor's Boston 2030 Plan as a key site for housing and also targeted for a new mixed-use development district. The HYM Team has responded to the Mayor's vision by incorporating various housing types into its plan, including townhomes, apartments, condominiums, and senior housing, a gesture which also demonstrates a commitment to the needs of the East Boston community.

I applaud HYM's approach to considering how the site will connect to its surroundings. The plan proposed by HYM provides important connections between thriving East Boston and Revere neighborhoods by incorporating thoughtfully planned pedestrian paths, bicycle paths and open space connections.

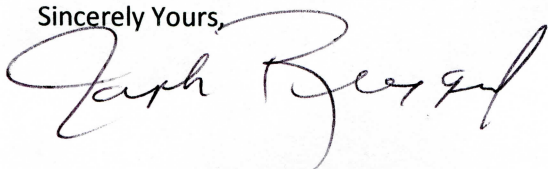
The HYM Team has clearly demonstrated thoughtful approach to the master planning process and needs of the community. They have programmed 40 acres of open space into the plan which represents 25% of the site's total acreage. This new open space system features a 15-acre central common, incorporates existing, underappreciated wetlands resources, and provides East Boston, Revere and surrounding communities with an urban gem to be enjoyed for generations to come.

The HYM Team should be commended for being incredibly responsive and transparent throughout the public review process. As the permitting process for the master plan moves forward, I look forward to the HYM Team continuing to engage the East Boston community thoughtfully and diligently.

Overall, I support the Suffolk Downs Redevelopment plan and look forward to the seeing the revitalization of the Suffolk Downs site come to fruition and becoming a vibrant part of East Boston.

Thank you for your consideration.

Sincerely Yours,

A handwritten signature in black ink, appearing to read "Joseph R. B. [unclear]". The signature is written in a cursive, flowing style.

February 9, 2018

Dear Mr. Czerwienski:

Enclosed you will find what you asked for concerning Suffolk Downs. I was born across the street from the track. Everything I write can be verified. It is my opinion that the Suffolk Downs Property would be the last place for the proposed project.

Patrick Catrone  
PO Box 277  
Revere, MA 02151

## The Big Hoax

I was born across the street from Suffolk Downs Race Track on 19 Sea View Avenue, in East Boston. It is my position, based upon my personal experience that the Suffolk Downs property should be the *last* place for the proposed project.

First of all, Suffolk Downs was built on wetlands. Governor Curly, used all his influence and power to bend and break the rules to build the track. A few years later, he was convicted of a variety of charges and went to jail.

One must understand the period; it was in 1935 during the middle of the Depression. Unemployment was running over 20%. I personally had two uncles that worked at the "track" 10 hours for five dollars, and they were glad to get it.

Years later, my Uncle Fred told me that they used asbestos in the walls and on all the pipes. At the time, nobody knew the danger of this deadly material. Today, it is outlawed all over the world. It is the second biggest cause of cancer after smoking.

My uncle told me that they trucked in tones of sand from Revere Beach to cover the 'wet lands" that is now the grandstand. They used gravel and cement to cover the floor. In 1969, after repaving the floor many times, they decided to tear up the floor on the north side of the grandstand and laid an asbestos mesh. I asked one of the workers what that was for? He said, "It would hopefully keep the ocean water running through". However, it didn't work, and the floors are now in worse shape than ever. Nobody will stop the tide from coming in; and with increase in global warming, building at the Suffolk Downs is inadvisable due to environmental, health and eventual fiscal concerns.

In 1943, one of the oil tanks had a major leak it was in the month of October. Suffolk Downs was closed at least ten fire trucks on site. I could see the disaster from my house. The firemen worked 24 hours a day for a month to clean up the oil. The fear was a fire.

In the mid 1940s, my friends and I used to walk to Revere Beach through Suffolk Downs' main road during the summer when it closed. One day we noticed a small pick-up in the south end opposite the grandstand. There was a man with a

shovel and sand on a truck. We thought he was cleaning up water, but he told us it was oil that leaked from the tanks. In our brief conversation, he said, "They all leak because they are old and in bad shaped." The parking lots are "wet lands" that have been filled in. Most of the trees that border the oil tanks are dead. The dangers working on this project are clear. In addition, the demolition of the Wonderland Dog Track was ordered to stop because of the huge danger of asbestos.

At the meeting the other night, the narrator said, "Eventually, the oil tanks would go." I wonder where they are going to go. He also said, "The grandstand would go at a later date". Tearing down the grandstand is going to be a major problem. The environmentalists will have a lot to say and the people on Waldermare Avenue will protest the asbestos problem.

Poppy Cavalari lived at 15 Sea View Avenue. He was our next-door neighbor. He was very elderly and would tell us many stories. He said, "They used to go swimming at Waldermare Avenue when I was a kid." He said, "They filled it in so the street cars could go into the track."

Finally, I find it inconceivable that in this day and age with our knowledge of climate change and understanding of environmental contamination a municipality would build on such unsuitable wetland. Therefore, I am requesting that the proposed development of the Suffolk Downs Racetrack be denied.

Respectfully,

A handwritten signature in black ink, appearing to read "Patrick Catrone". The signature is fluid and cursive, with a long horizontal stroke at the end.

Patrick Catrone

**APPENDIX C**  
COMMENTS FROM THE IMPACT ADVISORY GROUP



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

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

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Ernani DeAraujo [REDACTED]

Fri, Feb 2, 2018 at 10:44 AM

To: "tim.czerwienski@boston.gov" &lt;tim.czerwienski@boston.gov&gt;

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

Dear Tim:

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

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

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

Thank you for your consideration.

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

Madeleine Steczynski  
Alex DeFronzo  
Suffolk Downs Impact Advisory Group

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

February 1, 2018

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

**Dear Director Golden:**

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

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

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

**Live:**

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

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

**Work:**

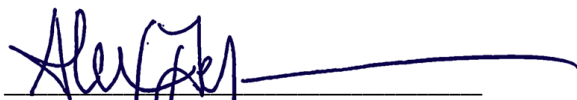
- A commitment to fund a minimum of \$15m toward the construction of a Blue/Red line connector for the MBTA.
- A commitment of a minimum of \$3m to rehabilitate the Suffolk Downs T-Station and to improve entry to the Beachmont T-Station.
- A commitment to work with the City on the creation of affordable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

**Connect:**

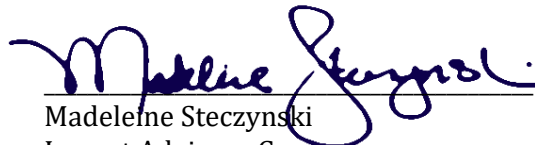
- A commitment to the creation of a perpetual community benefit fund supported by HYM to be managed by an open and transparent external charitable foundation.
  - Until such foundation is formed, funds contributed by HYM should be held by the BPDA.
  - A commitment for HYM to contribute \$2 for every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

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

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



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



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





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

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## Final Comments

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**Roberta Marchi** [REDACTED]

Fri, Feb 2, 2018 at 5:57 PM

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

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

Hi Tim,

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

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

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

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

Thanks for the chance to comment on this.

Roberta Marchi

February 7, 2018

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

Dear Mr. Czerwienski,

I'm writing this letter of support for HYM's redevelopment project at Suffolk Downs. The redevelopment of a 161 acre plot of land bordering East Boston and Revere will undoubtedly have a significant impact on both communities. This project, will transform what is now a wasteland of tar and cement and an underutilized horse racing facility into a thriving community replete with mixed income housing, public parkland, and a vibrant commercial space.

The HYM team has made an impressive effort to inform community residents of their plans for site development, soliciting feedback and suggestions whenever possible. Their commitment to meeting the needs and requirements of both host cities must be applauded. The incorporation of 40 acres of open space into the master plan provides an urban green space that can be enjoyed by present and future generations. HYM's understanding of climate change and its potential impact on the development site has been an underlying consideration throughout the planning process. As discussions unfold with various civic groups, city officials, and development partners, the design and nature of the Suffolk Development will coalesce into a proposal that meets the social, economic, and cultural needs of both hosting communities and cities at large.

In the knowledge that the development of Suffolk Downs will be a lengthy and evolving process, I have full confidence in HYM to work collaboratively with the residents and city officials of both Revere and Boston to create a dynamic and resilient complex that will celebrate the richness of both host communities.

Sincerely,

Debra L. Cave

February 6, 2018

Tim Czerwienski - Project Manager  
Boston Planning & Development Agency  
One City Hall Square, 9th Floor  
Boston, MA 02201

Dear Mr. Czerwienski:

I am writing to express my support for the Suffolk Downs Redevelopment project, for which the HYM Investment Group, LLC ("HYM") recently submitted a Project Notification Form in November 2017. The project involves the redevelopment of a 161-acre underutilized thoroughbred horse racing facility in East Boston and Revere into an active and vibrant mixed-use neighborhood.

I am a student at UMass Boston, (Community Economic Development) and I have been paying close attention to the Mayor's Boston 2030 Plan, and also have had casual conversations with the Mayor regarding the urgent need of affordable housing. The Suffolk Downs site was identified in Plan as a key site for housing and also targeted for a new mixed-use development district in an area that is transit accessible which is crucial for economic development. The HYM Team has responded to the Mayor's vision by incorporating various housing types into its plan, including townhomes, apartments, condominiums, senior housing and the construction of much needed affordable units directly in our neighborhood, a gesture which also demonstrates a commitment to the needs of the East Boston community.

I applaud HYM's approach to considering how the site will connect to its surroundings. The plan proposed by HYM provides important connections between thriving East Boston and Revere neighborhoods by incorporating thoughtfully planned pedestrian paths, bicycle paths and open space connections.

The HYM Team has clearly demonstrated thoughtful approach to the master planning process and needs of the community. They have programmed 40 acres of open space into the plan which represents 25% of the site's total acreage. This new open space system features a 15-acre central common, incorporates existing, underappreciated wetlands resources, and provides East Boston, Revere and surrounding communities with an urban gem to be enjoyed for generations to come. This is an important feature of the new plan; it will offer our community the opportunity to utilize such spaces as platforms to express our diversity in different forms of art and activities.

As a Latina and resident of East Boston for 27 years, it is the first time that a developer makes all the necessary efforts to listen and to provide information about this important project in Spanish. The HYM Team has been very responsive and transparent throughout the public review process. As the permitting process for the master plan moves forward, I look forward to the HYM Team continuing to engage the East Boston community thoughtfully and diligently.

Overall, I support the Suffolk Downs Redevelopment plan and look forward to the seeing the revitalization of the Suffolk Downs becoming a vibrant part of East Boston.

Thank you for your consideration.

Sincerely Yours,  
Claudia Sierra  
5 Condor Street, Unit 2  
East Boston MA 02128



**APPENDIX D**  
EXAMPLE OF DPIR PUBLIC NOTICE

SAMPLE

**PUBLIC NOTICE**

The Boston Redevelopment Authority ("BRA") d/b/a the Boston Planning & Development Agency ("BPDA"), acting pursuant to Article 80 of the Boston Zoning Code, hereby gives notice that a Draft Project Impact Report ("DPIR") for Large Project Review has been received from

\_\_\_\_\_ on \_\_\_\_\_  
(Name of Applicant) (Date)

for \_\_\_\_\_  
(Brief Description of Project)

proposed at \_\_\_\_\_.  
(Location of Project)

The Proponent is seeking the issuance of a Preliminary Adequacy Determination by the Director of the BRA pursuant to Section 80B-5 of the Code. The BRA, in the Preliminary Adequacy Determination regarding the DPIR, may waive further review requirements pursuant to Section 80B-5.4(c)(iv) of the Code, if after reviewing public comments, the BRA finds that such DPIR adequately described the Proposed Project's impacts.

The DPIR may be reviewed on the BRA website- [www.bostonplans.org](http://www.bostonplans.org) or at the office of the Secretary of the BRA, Room 910, Boston City Hall, 9th Floor, Boston, MA. 02201 between 9:00 AM and 5:00 PM, Monday through Friday, except legal holidays. Public comments on the DPIR, including the comments of public agencies, should be submitted in writing to Tim Czerwienski, Project Manager, BPDA, at the address stated above or via email at [Tim.Czerwienski@Boston.gov](mailto:Tim.Czerwienski@Boston.gov), within seventy five (75) days of this notice or by \_\_\_\_\_.

BOSTON REDEVELOPMENT AUTHORITY  
d/b/a BOSTON PLANNING & DEVELOPMENT AGENCY

Teresa Polhemus  
Executive Director/Secretary

**APPENDIX E**  
ACCESSIBILITY CHECKLIST

## Article 80 – Accessibility Checklist

### A requirement of the Boston Planning & Development Agency (BPDA) Article 80 Development Review Process

The Mayor’s Commission for Persons with Disabilities strives to reduce architectural, procedural, attitudinal, and communication barriers that affect persons with disabilities in the City of Boston. In 2009, a Disability Advisory Board was appointed by the Mayor to work alongside the Commission in creating universal access throughout the city’s built environment. The Disability Advisory Board is made up of 13 volunteer Boston residents with disabilities who have been tasked with representing the accessibility needs of their neighborhoods and increasing inclusion of people with disabilities.

In conformance with this directive, the BPDA has instituted this Accessibility Checklist as a tool to encourage developers to begin thinking about access and inclusion at the beginning of development projects, and strive to go beyond meeting only minimum MAAB / ADAAG compliance requirements. Instead, our goal is for developers to create ideal design for accessibility which will ensure that the built environment provides equitable experiences for all people, regardless of their abilities. As such, any project subject to Boston Zoning Article 80 Small or Large Project Review, including Institutional Master Plan modifications and updates, must complete this Accessibility Checklist thoroughly to provide specific detail about accessibility and inclusion, including descriptions, diagrams, and data.

For more information on compliance requirements, advancing best practices, and learning about progressive approaches to expand accessibility throughout Boston’s built environment. Proponents are highly encouraged to meet with Commission staff, prior to filing.

#### Accessibility Analysis Information Sources:

1. Americans with Disabilities Act – 2010 ADA Standards for Accessible Design  
[http://www.ada.gov/2010ADASTandards\\_index.htm](http://www.ada.gov/2010ADASTandards_index.htm)
2. Massachusetts Architectural Access Board 521 CMR  
<http://www.mass.gov/eopss/consumer-prot-and-bus-lic/license-type/aab/aab-rules-and-regulations.pdf.html>
3. Massachusetts State Building Code 780 CMR  
<http://www.mass.gov/eopss/consumer-prot-and-bus-lic/license-type/csl/building-codebbrs.html>
4. Massachusetts Office of Disability – Disabled Parking Regulations  
<http://www.mass.gov/anf/docs/mod/hp-parking-regulations-summary-mod.pdf>
5. MBTA Fixed Route Accessible Transit Stations  
[http://www.mbta.com/riding\\_the\\_t/accessible\\_services/](http://www.mbta.com/riding_the_t/accessible_services/)
6. City of Boston – Complete Street Guidelines  
<http://bostoncompletestreets.org/>
7. City of Boston – Mayor’s Commission for Persons with Disabilities Advisory Board  
[www.boston.gov/disability](http://www.boston.gov/disability)
8. City of Boston – Public Works Sidewalk Reconstruction Policy  
[http://www.cityofboston.gov/images\\_documents/sidewalk%20policy%200114\\_tcm3-41668.pdf](http://www.cityofboston.gov/images_documents/sidewalk%20policy%200114_tcm3-41668.pdf)
9. City of Boston – Public Improvement Commission Sidewalk Café Policy  
[http://www.cityofboston.gov/images\\_documents/Sidewalk\\_cafes\\_tcm3-1845.pdf](http://www.cityofboston.gov/images_documents/Sidewalk_cafes_tcm3-1845.pdf)

#### Glossary of Terms:

1. **Accessible Route** – A continuous and unobstructed path of travel that meets or exceeds the dimensional and inclusionary requirements set forth by MAAB 521 CMR: Section 20
2. **Accessible Group 2 Units** – Residential units with additional floor space that meet or exceed the dimensional and inclusionary requirements set forth by MAAB 521 CMR: Section 9.4
3. **Accessible Guestrooms** – Guestrooms with additional floor space, that meet or exceed the dimensional and inclusionary requirements set forth by MAAB 521 CMR: Section 8.4
4. **Inclusionary Development Policy (IDP)** – Program run by the BPDA that preserves access to affordable housing opportunities, in the City. For more information visit: <http://www.bostonplans.org/housing/overview>
5. **Public Improvement Commission (PIC)** – The regulatory body in charge of managing the public right of way. For more information visit: <https://www.boston.gov/pic>
6. **Visitability** – A place’s ability to be accessed and visited by persons with disabilities that cause functional limitations; where architectural barriers do not inhibit access to entrances/doors and bathrooms.

**Article 80 | ACCESSIBILTY CHECKLIST**

<p><b>1. Project Information:</b>  <i>If this is a multi-phased or multi-building project, fill out a separate Checklist for each phase/building.</i></p>			
Project Name:			
Primary Project Address:			
Total Number of Phases/Buildings:			
Primary Contact (Name / Title / Company / Email / Phone):			
Owner / Developer:			
Architect:			
Civil Engineer:			
Landscape Architect:			
Permitting:			
Construction Management:			
At what stage is the project at time of this questionnaire? Select below:			
		PNF / Expanded PNF Submitted	Draft / Final Project Impact Report Submitted
		BPDA Design Approved	BPDA Board Approved
			Under Construction
			Construction Completed:
Do you anticipate filing for any variances with the Massachusetts Architectural Access Board (MAAB)? <i>If yes, identify and explain.</i>			
<p><b>2. Building Classification and Description:</b>  <i>This section identifies preliminary construction information about the project including size and uses.</i></p>			
What are the dimensions of the project?			
Site Area:		SF	Building Area:
			GSF
Building Height:		FT.	Number of Stories:
			Flrs.
First Floor Elevation:			Is there below grade space:
			Yes / No



**Article 80 | ACCESSIBILITY CHECKLIST**

What is the Construction Type? (Select most appropriate type)				
	Wood Frame	Masonry	Steel Frame	Concrete
What are the principal building uses? (IBC definitions are below – select all appropriate that apply)				
	Residential – One - Three Unit	Residential - Multi-unit, Four +	Institutional	Educational
	Business	Mercantile	Factory	Hospitality
	Laboratory / Medical	Storage, Utility and Other		
List street-level uses of the building:				
<p><b>3. Assessment of Existing Infrastructure for Accessibility:</b>  <i>This section explores the proximity to accessible transit lines and institutions, such as (but not limited to) hospitals, elderly &amp; disabled housing, and general neighborhood resources. Identify how the area surrounding the development is accessible for people with mobility impairments and analyze the existing condition of the accessible routes through sidewalk and pedestrian ramp reports.</i></p>				
Provide a description of the neighborhood where this development is located and its identifying topographical characteristics:				
List the surrounding accessible MBTA transit lines and their proximity to development site: commuter rail / subway stations, bus stops:				
List the surrounding institutions: hospitals, public housing, elderly and disabled housing developments, educational facilities, others:				
List the surrounding government buildings: libraries, community centers, recreational facilities, and other related facilities:				
<p><b>4. Surrounding Site Conditions – Existing:</b>  <i>This section identifies current condition of the sidewalks and pedestrian ramps at the development site.</i></p>				
Is the development site within a historic district? <b>If yes</b> , identify which district:				
Are there sidewalks and pedestrian ramps existing at the development site? <b>If yes</b> , list the existing sidewalk and pedestrian ramp				

**Article 80 | ACCESSIBILITY CHECKLIST**

<p>dimensions, slopes, materials, and physical condition at the development site:</p>	
<p>Are the sidewalks and pedestrian ramps existing-to-remain? <b>If yes</b>, have they been verified as ADA / MAAB compliant (with yellow composite detectable warning surfaces, cast in concrete)? <b>If yes</b>, provide description and photos:</p>	
<p><b>5. Surrounding Site Conditions – Proposed</b></p> <p><i>This section identifies the proposed condition of the walkways and pedestrian ramps around the development site. Sidewalk width contributes to the degree of comfort walking along a street. Narrow sidewalks do not support lively pedestrian activity, and may create dangerous conditions that force people to walk in the street. Wider sidewalks allow people to walk side by side and pass each other comfortably walking alone, walking in pairs, or using a wheelchair.</i></p>	
<p>Are the proposed sidewalks consistent with the Boston Complete Street Guidelines? <b>If yes</b>, choose which Street Type was applied: Downtown Commercial, Downtown Mixed-use, Neighborhood Main, Connector, Residential, Industrial, Shared Street, Parkway, or Boulevard.</p>	
<p>What are the total dimensions and slopes of the proposed sidewalks? List the widths of the proposed zones: Frontage, Pedestrian and Furnishing Zone:</p>	
<p>List the proposed materials for each Zone. Will the proposed materials be on private property or will the proposed materials be on the City of Boston pedestrian right-of-way?</p>	
<p>Will sidewalk cafes or other furnishings be programmed for the pedestrian right-of-way? <b>If yes</b>, what are the proposed dimensions of the sidewalk café or furnishings and what will the remaining right-of-way clearance be?</p>	
<p>If the pedestrian right-of-way is on private property, will the proponent seek a pedestrian easement with the Public Improvement Commission (PIC)?</p>	

**Article 80 | ACCESSIBLTY CHECKLIST**

Will any portion of the Project be going through the PIC? <b>If yes</b> , identify PIC actions and provide details.	
<p><b>6. Accessible Parking:</b>  <i>See Massachusetts Architectural Access Board Rules and Regulations 521 CMR Section 23.00 regarding accessible parking requirement counts and the Massachusetts Office of Disability – Disabled Parking Regulations.</i></p>	
What is the total number of parking spaces provided at the development site? Will these be in a parking lot or garage?	
What is the total number of accessible spaces provided at the development site? How many of these are “Van Accessible” spaces with an 8 foot access aisle?	
Will any on-street accessible parking spaces be required? <b>If yes</b> , has the proponent contacted the Commission for Persons with Disabilities regarding this need?	
Where is the accessible visitor parking located?	
Has a drop-off area been identified? <b>If yes</b> , will it be accessible?	
<p><b>7. Circulation and Accessible Routes:</b>  <i>The primary objective in designing smooth and continuous paths of travel is to create universal access to entryways and common spaces, which accommodates persons of all abilities and allows for visitability-with neighbors.</i></p>	
Describe accessibility at each entryway: Example: Flush Condition, Stairs, Ramp, Lift or Elevator:	

**Article 80 | ACCESSIBILITY CHECKLIST**

<p>Are the accessible entrances and standard entrance integrated? <b>If yes, describe. If no, what is the reason?</b></p>	
<p><b>If project is subject to Large Project Review/Institutional Master Plan, describe the accessible routes way-finding / signage package.</b></p>	
<p><b>8. Accessible Units (Group 2) and Guestrooms: (If applicable)</b>  <i>In order to facilitate access to housing and hospitality, this section addresses the number of accessible units that are proposed for the development site that remove barriers to housing and hotel rooms.</i></p>	
<p>What is the total number of proposed housing units or hotel rooms for the development?</p>	
<p><b>If a residential development, how many units are for sale? How many are for rent? What is the breakdown of market value units vs. IDP (Inclusionary Development Policy) units?</b></p>	
<p><b>If a residential development, how many accessible Group 2 units are being proposed?</b></p>	
<p><b>If a residential development, how many accessible Group 2 units will also be IDP units? If none, describe reason.</b></p>	
<p><b>If a hospitality development, how many accessible units will feature a wheel-in shower? Will accessible equipment be provided as well? If yes, provide amount and location of equipment.</b></p>	
<p>Do standard units have architectural barriers that would prevent entry or use of common space for persons with mobility impairments? Example: stairs / thresholds at entry, step to balcony, others. <b>If yes, provide reason.</b></p>	

**Article 80 | ACCESSIBILITY CHECKLIST**

<p>Are there interior elevators, ramps or lifts located in the development for access around architectural barriers and/or to separate floors? <b>If yes</b>, describe:</p>	
<p><b>9. Community Impact:</b>  <i>Accessibility and inclusion extend past required compliance with building codes. Providing an overall scheme that allows full and equal participation of persons with disabilities makes the development an asset to the surrounding community.</i></p>	
<p>Is this project providing any funding or improvements to the surrounding neighborhood? Examples: adding extra street trees, building or refurbishing a local park, or supporting other community-based initiatives?</p>	
<p>What inclusion elements does this development provide for persons with disabilities in common social and open spaces? Example: Indoor seating and TVs in common rooms; outdoor seating and barbeque grills in yard. Will all of these spaces and features provide accessibility?</p>	
<p>Are any restrooms planned in common public spaces? <b>If yes</b>, will any be single-stall, ADA compliant and designated as “Family”/ “Companion” restrooms? <b>If no</b>, explain why not.</p>	
<p>Has the proponent reviewed the proposed plan with the City of Boston Disability Commissioner or with their Architectural Access staff? <b>If yes</b>, did they approve? <b>If no</b>, what were their comments?</p>	
<p>Has the proponent presented the proposed plan to the Disability Advisory Board at one of their monthly meetings? Did the Advisory Board vote to support this project? <b>If no</b>,</p>	

**Article 80 | ACCESSIBILITY CHECKLIST**

<p>what recommendations did the Advisory Board give to make this project more accessible?</p>	
<p><b>10. Attachments</b> <i>Include a list of all documents you are submitting with this Checklist. This may include drawings, diagrams, photos, or any other material that describes the accessible and inclusive elements of this project.</i></p>	
<p>Provide a diagram of the accessible routes to and from the accessible parking lot/garage and drop-off areas to the development entry locations, including route distances.</p>	
<p>Provide a diagram of the accessible route connections through the site, including distances.</p>	
<p>Provide a diagram the accessible route to any roof decks or outdoor courtyard space? (if applicable)</p>	
<p>Provide a plan and diagram of the accessible Group 2 units, including locations and route from accessible entry.</p>	
<p>Provide any additional drawings, diagrams, photos, or any other material that describes the inclusive and accessible elements of this project.</p> <ul style="list-style-type: none"><li>•</li><li>•</li><li>•</li><li>•</li></ul>	

This completes the Article 80 Accessibility Checklist required for your project. Prior to and during the review process, Commission staff are able to provide technical assistance and design review, in order to help achieve ideal accessibility and to ensure that all buildings, sidewalks, parks, and open spaces are usable and welcoming to Boston's diverse residents and visitors, including those with physical, sensory, and other disabilities.

For questions or comments about this checklist, or for more information on best practices for improving accessibility and inclusion, visit [www.boston.gov/disability](http://www.boston.gov/disability), or our office:

The Mayor's Commission for Persons with Disabilities  
1 City Hall Square, Room 967,  
Boston MA 02201.

Architectural Access staff can be reached at:

**Article 80 | ACCESSIBILITY CHECKLIST**

[accessibility@boston.gov](mailto:accessibility@boston.gov) | [patricia.mendez@boston.gov](mailto:patricia.mendez@boston.gov) | [sarah.leung@boston.gov](mailto:sarah.leung@boston.gov) | 617-635-3682

**APPENDIX F**  
BROADBAND READY BUILDINGS QUESTIONNAIRE



## **ARTICLE 80 DESIGN REVIEW BROADBAND READY BUILDINGS QUESTIONNAIRE**

The City of Boston is working to cultivate a broadband ecosystem that serves the current and future connectivity needs of residents, businesses, and institutions. The real estate development process offers a unique opportunity to create a building stock in Boston that enables this vision. In partnership with the development community, the Boston Planning and Development Authority and the City of Boston will begin to leverage this opportunity by adding a broadband readiness component to the Article 80 Design Review. This component will take the form of a set of questions to be completed as part of the Project Notification Form. Thoughtful integration of future-looking broadband practices into this process will contribute to progress towards the following goals:

1. Enable an environment of competition and choice that results in all residents and businesses having a choice of 2 or more wireline or fixed wireless high-speed Internet providers
2. Create a built environment that is responsive to new and emerging connectivity technologies
3. Minimize disruption to the public right of way during and after construction of the building

The information that is shared through the Project Notification Form will help BPDA and the City understand how developers currently integrate telecommunications planning in their work and how this integration can be most responsive to a changing technological landscape.

Upon submission of this online form, a PDF of the responses provided will be sent to the email address of the individual entered as Project Contact. Please include this PDF in the Project Notification Form packet submitted to BPDA.

## **SECTION 1: GENERAL QUESTIONS**

### Project Information

- Project Name:
- Project Address Primary:
- Project Address Additional:
- Project Contact (name / Title / Company / email / phone):
- Expected completion date

### Team Description

- Owner / Developer
- Architect
- Engineer (building systems):
- Permitting:
- Construction Management

## **SECTION 2: RIGHT OF WAY TO BUILDING**

### *Point of Entry Planning*

Point of entry planning has important implications for the ease with which your building's telecommunications services can be installed, maintained, and expanded over time.

#1: Please provide the following information for your building's point of entry planning (conduits from building to street for telecommunications). Please enter 'unknown' if these decisions have not yet been made or you are presently unsure.

- Number of Points of Entry
- Locations of Points of Entry
- Quantity and size of conduits
- Location where conduits connect (e.g. building-owned manhole, carrier-specific manhole or stubbed at property line)
- Other information/comments

#2: Do you plan to conduct a utility site assessment to identify where cabling is located within the street? This information can be helpful in determining the locations of POEs and telco rooms. Please enter 'unknown' if these decisions have not yet been made or you are presently unsure.

- Yes
- No
- Unknown

## **SECTION 3: INSIDE OF THE BUILDING**

### ***Riser Planning***

Riser capacity can enable multiple telecom providers to serve tenants in your building.

#3: Please provide the following information about the riser plans throughout the building. Please enter 'unknown' if these decisions have not yet been made or you are presently unsure.

- Number of risers
- Distance between risers (if more than one)
- Dimensions of riser closets
- Riser or conduit will reach to top floor
- Number and size of conduits or sleeves within each riser
- Proximity to other utilities (e.g. electrical, heating)
- Other information/comments

### ***Telecom Room***

A well designed telecom room with appropriate security and resiliency measures can be an enabler of tenant choice and reduce the risk of service disruption and costly damage to telecom equipment.

#4: Please provide the following information about the telecom room plans. Please enter 'unknown' if these decisions have not yet been made or you are presently unsure.

- What is the size of the telecom room?
- Describe the electrical capacity of the telecom room (i.e. # and size of electrical circuits)
- Will the telecom room be located in an area of the building containing one or more load bearing walls?
- Will the telecom room be climate controlled?
  - Yes
  - No
  - Unknown

- If the building is within a flood-prone geographic area, will the telecom equipment will be located above the floodplain?
  - Yes
  - No
  - Unknown
  
- Will the telecom room be located on a floor where water or other liquid storage is present?
  - Yes
  - No
  - Unknown
  
- Will the telecom room contain a flood drain?
  - Yes
  - No
  - Unknown
  
- Will the telecom room be single use (telecom only) or shared with other utilities?
  - Telecom only
  - Shared with other utilities
  - Unknown
  
- Other information/comments

***Delivery of Service Within Building (Residential Only)***

Please enter 'unknown' if these decisions have not yet been made or you are presently unsure. Questions 5 through 8 are for residential development only.

#5: Will building/developer supply common inside wiring to all floors of the building?

- Yes
- No
- Unknown

#6: If so, what transmission medium (e.g. coax, fiber)? Please enter 'unknown' if these decisions have not yet been made or you are presently unsure.

#7: Is the building/developer providing wiring within each unit?

- Yes
- No
- Unknown

#8: If so, what transmission medium (e.g. coax, fiber)? Please enter 'unknown' if these decisions have not yet been made or you are presently unsure.

#### **SECTION 4: ACCOMMODATION OF NEW AND EMERGING TECHNOLOGIES**

##### ***Cellular Reception***

The quality of cellular reception in your building can have major impacts on quality of life and business operations.

Please provide the following information on your plans to facilitate high quality cellular coverage in your building. Please enter 'unknown' if these decisions have not yet been made or you are presently unsure.

#9: Will the building conduct any RF benchmark testing to assess cellular coverage?

- Yes
- No
- Unknown

#10: Will the building allocate any floor space for future in-building wireless solutions (DAS/small cell/booster equipment)?

- Yes
- No
- Unknown

#11: Will the building be providing an in-building solution (DAS/ Small cell/ booster)?

- Yes
- No
- Unknown

#12: If so, are you partnering with a carrier, neutral host provider, or self-installing?

- Carrier
- Neutral host provider
- Self-installing

### **Rooftop Access**

Building rooftops are frequently used by telecommunications providers to install equipment critical to the provision of service to tenants.

Please provide the following information regarding your plans for roof access and usage. Please enter 'unknown' if these decisions have not yet been made or you are presently unsure.

#13: Will you allow cellular providers to place equipment on the roof?

- Yes
- No
- Unknown

#14: Will you allow broadband providers (fixed wireless) to install equipment on the roof?

- Yes
- No
- Unknown

## **SECTION 5: TELECOM PROVIDER OUTREACH**

### ***Supporting Competition and Choice***

Having a choice of broadband providers is a value add for property owners looking to attract tenants and for tenants in Boston seeking fast, affordable, and reliable broadband service. In addition to enabling tenant choice in your building, early outreach to telecom providers can also reduce cost and disruption to the public right of way. The following questions focus on steps that property owners can take to ensure that multiple wireline or fixed wireless broadband providers can access your building and provide service to your tenants.

#15: (Residential Only) Please provide the date upon which each of the below providers were successfully contacted, whether or not they will serve the building, what transmission medium they will use (e.g. coax, fiber) and the reason they provided if the answer was 'no'.

- Comcast
- RCN
- Verizon
- NetBlazr
- WebPass
- Starry

#16: Do you plan to abstain from exclusivity agreements with broadband and cable providers?

- Yes
- No
- Unknown

#17: Do you plan to make public to tenants and prospective tenants the list of broadband/cable providers who serve the building?

- Yes
- No
- Unknown

## **SECTION 6: FEEDBACK**

The Boston Planning and Development Agency looks forward to supporting the developer community in enabling broadband choice for resident and businesses. Please provide feedback on your experience completing these questions.