



Boston City Council

LYDIA EDWARDS

Councilor - District 1

May 31, 2019

Mayor Martin J. Walsh
1 City Hall Square, Suite 500
Boston, MA 02201-2013

Brian Golden, Director
Boston Planning & Development Agency
One City Hall Square
Boston, MA 02201-2013

Dear Mayor Walsh, Director Golden and Mr. Czerwinski:

I am pleased to submit comments on the Suffolk Downs Planned Development Area.

I support the development of the Suffolk Downs site and I believe it offers a substantial opportunity to build the middle class through quality construction and permanent jobs.

I also appreciate that the project proponents and BPDA staff have spent substantial time on planning for Suffolk Downs. Nonetheless, I have heard repeatedly from community residents, organizations, and multiple members of the project's Implementation Advisory Group that:

- there is inadequate information regarding key issues in order to sufficient render a decision on the project and Planned Development Area filing; and
- the proponent, the BPDA and the City of Boston have provided inadequate information specifically on housing affordability; and
- while the project planning has been underway for some time, East Boston residents have not been meaningfully involved until calendar year 2019; and
- there is no plan to address development-induced displacement, which will substantially impact residents of East Boston adjacent to Suffolk Downs; and
- residents of Limited English Proficiency have been inadequately involved; and
- in a project the BPDA has identified as the largest ever development for Boston, the city and the BPDA have extraordinary responsibility to do due diligence; and
- given the unprecedented scale of this project, the Cooperation, Transportation and other Master Plan agreements should be subject to community review and approved concurrently with, and not after, the Planned Development Area for Suffolk Downs.

I concur with these points.

To that end, please note I am today requesting the Boston Planning and Development Agency extend the comment period for the Suffolk Downs Planned Development Area.



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It is critical to distinguish between the extensive time the proponent and project manager have spent on the project from the specific comment period on the Planned Development Area. With regards to the overall planning process, I believe that the proponent has done remarkable work in describing their proposal to formally established civic associations and to residents of Orient Heights abutting one side of the project.

However, there has been less success at reaching highly-impacted residents, including low-income residents, communities of color and non-English speakers. Additionally, it is critical that planning and conversations around Suffolk Downs meaningfully reflect input from all populations and are not simply informative as to the nature of these plans. Comment on the Planned Development Area itself has not been a two-year process but one that began in February 2019, during which time additional information has come to light and questions about information that is not yet available have been presented to my office and to the BPDA.

I am further requesting the Boston Planning and Development Agency issue a Request for Information specific to housing affordability and fair housing, and that the Agency invite comment from pertinent city offices and experts in the field. Because access to economic opportunity, and equity in municipal services and public benefit investments are themselves issues inextricably connected to fair housing, the Agency should also consider the relation of these factors to the full inclusion of minority and Limited English Proficiency populations. The BPDA should specifically require upfront mitigation to fund ESL/ESOL classes in East Boston.

Detailed comments from my office follow.

I look forward to dialogue with the East Boston community, City of Boston, the Boston Planning and Development Agency, state agencies and the project proponent and its workforce to shape a holistic and equitable vision for the site that is fully compliant with fair housing laws and regulations. I have many kind words to say about the project proponent and have full confidence a revised project can advance. However, because the current proposal, proposed mitigation and zoning guidance would engender substantial risk of violating basic principles of fair housing, I am unable to support it in its current form. Resolution of this matter is the city's interest and will require new consideration of public involvement and investment in the project.

Regards,

Lydia Edwards

Boston City Councilor, District One

Chair, City Council Committee on Housing and Community Development

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Context in East Boston

Housing Crisis

Housing affordability is at a crisis in Boston, and East Boston faces particularly severe housing challenges. The Department of Neighborhood Development identifies 34,000 low-income households renter households in Boston as severely rent-burdened in its 2018 Update of the Housing Boston 2030 plan.¹ In portions of East Boston, rent-burden may exceed 40-50% of renters.² The Boston Public Health Commission has identified rates of overcrowded housing as a serious issue in East Boston, more so than any other neighborhood, with >10% of rooms occupied by multiple dwellers.³ The displacement crisis in East Boston is broadly recognized⁴ and years of speculative activity⁵ and development pressures on existing housing stock⁶ are impacting residents and threatening the fabric of the community. Residents cannot afford the burden of rising rents, and they cannot afford new housing that is being developed.

According to [Boston in Context](#), a report published by the Boston Planning and Development Agency, the median household income in Boston is \$62,021.⁷ In East Boston, the median household income is lower at \$52,935. The BPDA's report also shows income per capita in Boston is \$39,686, and in East Boston, \$26,569. An analysis by the Boston Tenant Coalition notes that for Latino families (\$31,400), black families (\$35,800) and renters overall (\$38,200) household income is even lower, while homeowners (\$104,300) and white households (\$88,100) have higher incomes. Notably, 57.4% of residents in East Boston are Hispanic or Latino. Boston is primarily a city of renters, with 64% citywide and 71.4% in East Boston renting.

East Boston households are predominantly family households (59.1%) and Eastie families reside together at higher rates than in Boston (48.2%). The average household size in East Boston is 2.8 and is projected to be 2.6 by 2030, a notable difference from the 1.58 estimated by the project proponent for Suffolk Downs.

Transportation and Traffic Congestion

East Boston is an Environmental Justice community that is physically islanded from the City of Boston. The neighborhood is both a transportation hub and is utilized as a cut-through for multiple commuting pathways. East Boston receives substantial commuter traffic from north of Boston and also hosts Logan Airport and its corresponding environmental burdens. The neighborhood hosts multiple MBTA Blue Line

¹ <https://www.boston.gov/departments/neighborhood-development/housing-changing-city-boston-2030>

² <http://www.bostondisplacement.org/maps/rent-burdened/>

³ http://www.bphc.org/healthdata/health-of-boston-report/Documents/HOB_16-17_FINAL_SINGLE%20PAGES.pdf

⁴ <https://www.wbur.org/news/2015/07/06/east-boston-rents-residents>

⁵ <https://www.bostonglobe.com/business/2017/08/24/building-clearouts-are-rise-housing-advocates-say/7f0egrovQqCoQqeMbc79cL/story.html>

⁶ <https://www.wbur.org/artery/2018/11/07/east-boston-gentrification-zumix-stories>

⁷ <http://www.bostonplans.org/getattachment/8349ada7-6cc4-4d0a-a5d8-d2fb966ea4fe>

stops as well as multiple bus lines. Advocates and business leaders are presently seeking to expand ferry service to the area to offer alternative modes of travel, decrease cars on the road and reduce air pollution.

Congestion and its consequences, including time lost at work, are increasing as East Boston suffers a growing traffic burden. The use of the Sumner Tunnel has skyrocketed past state projections.⁸ Transportation Network Company rides have also surged, with 12 million trips to Logan in 2018 of which 5 million had no passengers. Prior to a recent surge in car traffic, the neighborhood already experienced health burdens from transportation and rates of chronic obstructive pulmonary disease are higher in the area as a consequence of airport pollution.⁹ On a positive note, demand for public transit remains strong and ridership of the MBTA Blue Line continues to increase even as it falls on other lines.¹⁰

Open Space and Climate Resiliency

East Boston is extremely vulnerable to climate change, particularly sea level rise. Without critical actions, the neighborhood and its residents would remain and become increasingly susceptible to flooding and related damages. The City has adopted a neighborhood investment strategy of addressing climate resiliency, and Climate Ready East Boston identified a series of target actions and investments for East Boston, including temporary flood barriers, park improvements and other measures.¹¹ The City Council is currently considering adopting wetlands protections¹² to safeguard critical natural areas such as Belle Isle Marsh from development impacts.¹³ The BPDA is separately planning for flood overlay zoning, although no text of such zoning is presently available.

Youth leaders in the area have noted the lack of tree canopy in the area and pressed for additional greenspace investments to improve environmental quality, cool neighborhoods and improve stormwater management.¹⁴ Residents and community organizations have also sought additional recreational spaces and open spaces, including an expanded East Boston Greenway and additional soccer fields. Due to the complex relationship of property values,¹⁵ neighborhood improvement and climate resiliency, some residents and advocates are concerned about the gentrifying impacts of resiliency investments.¹⁶

Economic Activity and Population

Today, major industries in East Boston include air transportation + support services; hospitality; building services; the restaurant industry and other food and beverage services; car/automotive equipment, rental and leasing; local and state government (including schools); outpatient care centers; and other industries such as real estate, care workers, retail, and medical (IMPLAN, 2016). As noted previously, the median

⁸ <http://eastietimes.com/2019/03/01/sen-boncore-rep-madaro-file-legislation-to-address-easties-traffic-woes>

⁹ <https://www.mass.gov/info-details/logan-airport-health-study>

¹⁰ <https://www.bostonglobe.com/metro/2018/11/28/mbta-subway-ridership-dropping-except-blue-line/qXThqCoRCCeuAkhXI0E11L/story.html>

¹¹ <https://www.boston.gov/departments/environment/climate-ready-east-boston>

¹² <https://eastietimes.com/2019/02/08/councilors-wu-and-omalley-file-local-wetlands-protection-ordinance-2/>

¹³ <https://www.mass.gov/locations/belle-isle-marsh-reservation>

¹⁴ <https://www.wbur.org/news/2017/07/05/east-boston-tree-cover>

¹⁵ <https://www.bostonglobe.com/business/2019/01/22/study-rising-sea-has-cut-home-values/RTt7hGvt380KDu6M81WOO/story.html>

¹⁶ <https://www.wbur.org/earthwhile/2019/05/02/moakley-park-east-boston-climate-resiliency>

household income and per capita income are lower in East Boston (\$52,935/\$25,569) than citywide in Boston (\$62,021/\$39,686) and incomes for Latino households also are lower than the neighborhood or city median incomes (\$31,400). East Boston has a high number of non-citizens (38%). Of East Boston's foreign-born population, the majority (75%) is from Central or South America. Although language isolation in the City of Boston is primarily found in the Asian community, East Boston, comparable with Chelsea and Lawrence, has a substantial population of Spanish speaking residents who have Limited English Proficiency.

Housing and Suffolk Downs

Proponent's Filings and BPDA Supplemental Information Request Fail to Adequately Address Housing Affordability and Fair Housing

The Draft Project Impact Report, Planned Development Area filing and the May 1st Supplemental Information Document¹⁷ do not adequately address the need for housing affordability in East Boston or the City. Comments on housing affordability and the displacement crisis facing East Boston exist within the DPIR record (*see comments from Neighborhood of Affordable Housing, GreenRoots, IAG members Mr. DeAraujo and Mr. DiFronzo, as well as Ms. Leal-Nunez, Ms. Cowie-Haskell, and Mr. Patowski*). Numerous comments have also been made on the Planned Development Area filing and in public meetings on the topic of housing affordability.

Despite this, the BPDA's February 2019 request for supplemental information, although otherwise expansive, *does not inquire about, request additional information on, or indicate any intention of analyzing or addressing housing affordability*. The Planned Development Area and DPIR proceedings also appear to lack substantial engagement by the BPDA of critical city departments including the Department of Neighborhood Development, Office of Housing Stability, Office of Fair Housing and Equity and the Boston Public Health Commission.

It is additionally unclear based on the record whether the BPDA has meaningfully consulted information on housing stock, housing tenure, race and income published by its own research division, such as the annual Boston in Context report;¹⁸ research on housing and health published by city departments or other municipal agencies such as the Boston Public Health Commission's Health of Boston report;¹⁹ or available housing data published by other entities. Regardless, the BPDA and city departments are aware of, research and publish detailed information on neighborhood income, housing and are responsible for incorporation of this information in their analysis of the project, regulatory decisions and choices around mitigation.

Outside for the formal comment proceeding, IAG members have contacted my office indicating that neither the proponent nor the BPDA have adequately addressed housing affordability. Residents, community organizations, and representatives of organized labor have vocally indicated in public

¹⁷ <http://www.bostonplans.org/getattachment/8af639bc-decb-4123-8a90-7a1a1ec759a5>

¹⁸ <http://www.bostonplans.org/getattachment/8349ada7-6cc4-4d0a-a5d8-d2fb966ea4fe>

¹⁹ http://www.bphc.org/healthdata/health-of-boston-report/Documents/_HOB_16-17_FINAL_SINGLE%20PAGES-Revised%20Feb%202019.pdf

meetings organized by the BPDA or by my office, in direct conversation, in written comment and otherwise that housing affordability measures proposed for Suffolk Downs are inadequate.

My office has previously filed comments on an array of topics on the state DEIR, Planned Development Area filing and at the Boston Zoning Commission and would be pleased file comments on a Final Project Impact Report if the BPDA moves to require an FPIR, which may be appropriate given the unprecedented impacts of this project. Regardless, the DPIR comments & related submissions should be addressed by the BPDA prior to the issuance of a Preliminary Adequacy Determination or project advancement to the BPDA board for approval.

Project Filing Proposes Minimum Level of Inclusionary Housing; BPDA has Authority to Require Greater Concession

The proponent has proposed a 13% inclusionary development standard for the project. Inclusionary development is a policy in the City of Boston. The city's current standard for inclusionary development sets a base regulatory requirement for the city and the project proponent during development review. Due to the date of project filing, the base requirement is 13%. The BPDA's established policy on Planned Development Areas indicates the Agency and Zoning Commission have the ability to establish higher levels of affordability and that if the Agency does so, the higher level trumps the base requirement.²⁰

Planned Development Areas also require substantial public benefit mitigations. Article 53 of Boston's Zoning Code outlines minimum public benefit requirements for planned development areas in East Boston.²¹ I do not believe the existing base zoning is either sufficient or sufficiently clear and my office has filed zoning amendments to clarify this section of the code. However, even under the existing zoning, even the inclusionary housing would not qualify as a public benefit because it is unlikely to be "Affordable Housing available to East Boston and Boston residents." Similarly, without serious attention and targeted mitigation to enable the full participation of people of color and Limited English Proficiency residents, it is unclear whether economic diversification or job creation at Suffolk Downs will benefit East Boston residents.

In general, BPDA policy situates substantial authority for clarifying affordable housing requirements and public benefit requirements, and for requiring mitigation beyond that established in base zoning, at the staff level. Whether or not the agency chooses to assert a higher requirement is an active policy decision that should be held in the context of fair housing obligations.

The City of Boston's current inclusionary development policy targets renters earning up to 70% of Area Median Income (AMI) or homeowners earning 80-100% AMI. In inclusionary units at 70% AMI, rents for a household of four earning up to \$79,300 would be capped at \$1850, or, for an individual earning up to \$55,550, rents in inclusionary units would be capped between \$844 for SROs, \$1,125 for studios or \$1318 for one bedroom units. If units were restricted to 50% AMI, rents for a household of four earning up to \$56,650 would be capped at \$1,284 or, for an individual earning up to \$37,750, rents would be

²⁰ <http://www.bostonplans.org/getattachment/e6644505-ce9c-4e42-b591-40e6c6049d63>

²¹ https://library.municode.com/ma/boston/codes/redevelopment_authority?nodeId=ART53EABONEDI_REGULATIONS_APPLICABLE_PLANNED_DEVELOPMENT_AREAS_S53-49PLDEARPUBE

capped at \$589 for SROs, \$785 for studio apartments and \$922 for one bedroom units. The proposal for Suffolk Downs does not contain SROs, but does contain studio units. More information is available on the BPDA's website.²²

Based on previously cited demographic information, households earning around the median income in East Boston *may* qualify for and be able to afford rental units restricted for 50% AMI, but most would not be able to afford 70% AMI units. Many if not most Black and Latino residents in Boston, and single income earners and households of renters in East Boston, would struggle to afford either type of unit so without additional assistance. These populations tend towards closer to 30% of the AMI.

The project filing does not indicate whether any units will be produced below 70% of the area median income. The BPDA has not separately indicated whether or how it will require units affordable to East Boston residents, minority residents of the City of Boston or families with children. City housing agencies have separately indicated in FY20 budget hearings that they have not been significantly engaged in the review of Suffolk Downs. The vast majority of residential units proposed at Suffolk Downs, about 6000 in Boston and 3000 in Revere, would not be income restricted in any fashion under the current proposal. Suffolk Downs' transportation modeling relied on figures of 1.58 persons per household, and subsequent submissions by the project suggest a comparable figure.

City and State Obligation to Further Fair Housing

The City of Boston is currently conducting a planning process related to an Assessment of Fair Housing. The Commonwealth of Massachusetts is currently updating its Analysis of Impediments to Fair Housing. The BPDA and other stakeholders should certainly take note of these processes as relates to the PDA filing. However, attention to fair housing is neither optional nor does it require completion of the updated assessment and analysis.

Until the city's fair housing planning reaches a new public milestone, existing state and federal law and regulation, the city's public draft assessment,²³ the published 2010 Boston Analysis of Impediments²⁴ and 2013 Commonwealth Analysis of Impediments to Fair Housing Choice²⁵ are notable documents the BPDA should acknowledge and review. Some of the relevant impediments in Boston include factors such as affordability and rent burden, displacement risk and language isolation or Limited English Proficiency.

Specifically, the 2010 Analysis of Impediments (AI) noted that "[p]atterns of racial segregation in the metropolitan area impede access by people of color to low poverty areas with high performing schools, jobs, good housing conditions, and healthy living environments"; that language barriers constrain (housing and economic) opportunities; and the AI also acknowledged that the Boston Median Income is substantially lower than the Area Median Income, the latter of which is currently used as a proxy for inclusionary development. The City and State have also identified racially and ethnically concentrated

²² <http://www.bostonplans.org/housing/income,-asset,-and-price-limits>

²³ <https://www.boston.gov/departments/neighborhood-development/assessment-fair-housing>

²⁴ https://www.boston.gov/sites/default/files/boston_ai_press_pdf_version_tcm3-16790.pdf

²⁵ <https://www.mass.gov/files/documents/2017/10/25/2013analysis.pdf>

areas of poverty “R/ECAP” in East Boston and have identified East Boston as an area with substantial percent of Hispanic/Latinx and Limited English Proficiency residents.

There is ample federal law, regulation and case law regarding fair housing. Massachusetts statute, regulation and guidance also highlight fair housing issues. Per a 2013 state guidance document, “Prohibition of discrimination and/or enforcement of antidiscrimination laws are not sufficient. Liability may arise when there is a failure to affirmatively further fair housing as required. Such a failure may include perpetuating racial segregation patterns and adopting policies and activities that have a disparate impact on a protected class.”²⁶

The federal government is extraordinarily clear with regard for proactively interventions on fair housing. The U.S. Department of Housing and Urban Development (HUD) definition of affirmatively further fair housing includes “taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.”²⁷

To their great credit, the project proponent has already agreed to include language, and has suggested a draft of language, relevant to non-discrimination within the PDA filing, including affirmative marketing measures. My office acknowledges and appreciates these efforts and will continue to work with the proponent and the BPDA on completion of this language to include all protected classes. Additionally, it is critical such language and BPDA’s oversight include procedural safeguards to bridge the gap between non-discrimination and furthering fair housing. Proposed language revisions for the Planned Development Area filing regarding fair housing have been submitted by my office, to the Boston Planning and Development Agency and are attached. My office separately filed a zoning amendment to codify fair housing requirements and a procedural review of large development within Boston’s Zoning Code.

With regards to agencies of the Commonwealth, it is worth noting that any actions taken by MassDOT, the MBTA, the MEPA Office, etc. would be subject to state and federal civil rights policies including fair housing regulations. As noted, the Commonwealth of Massachusetts and Department of Housing and Community Development are also updating Massachusetts’ Analysis of Impediments to Fair Housing. DHCD is not involved directly in Suffolk Downs, but requirements set by the Massachusetts Environmental Policy Act office and Environmental Impact Report and requirements set or mitigation proposed by the Massachusetts Department of Transportation could potentially increase or decrease impediments to fair housing.

As such, all state agencies should attend to fair housing issues which may be impacted by (1) expenditure of public benefit dollars and the choice of how investments are prioritized; (2) transportation investments specifically; and (3) overall impact on fair housing and neighborhood segregation or integration.

Risk of Disparate Impact and Neighborhood Segregation Without Strong Housing and Anti-Displacement Measures

²⁶ <https://www.mass.gov/files/documents/2017/10/25/2013analysis.pdf>

²⁷ <https://www.hudexchange.info/programs/affh/>

If the BPDA's data or other publicly available and known data demonstrates likelihood that the Suffolk Downs development will exclude one or more protected classes identified in the Fair Housing Act or Chapter 151B of the Massachusetts General Laws, or otherwise perpetuate segregation, the BPDA engenders substantial risk in prematurely approving zoning regulations, a Planned Development Area or a Draft Project Impact Report. Furthermore, state guidance on fair housing clearly indicates failure to act or omission of policy may create liability and federal regulation is clear about the obligation to *affirmatively* further fair housing.

Relevant data does exist via the American Community Survey, BPDA publications, the Boston Tenant Coalition, and other resources previously cited. As noted, the Boston in Context report published by the BPDA provides ample detail, sourced from the American Community Survey, on demographics of East Boston.²⁸ The BPDA and City of Boston regulate inclusionary development and are aware of income guidelines, and the agency and city regularly survey rent levels or purchase costs for market rate and luxury housing. The BPDA has noted and acknowledged that "proponent's modeling assumed approximately 1.58 persons per household.... average household size in East Boston is currently 2.8 persons per dwelling unit" (page 9).²⁹

Based on the known data presently available, it appears reasonably likely that approval of the current proposal as drafted would produce a demographically isolated and physical separate neighborhood, situated between census tracts in East Boston and Revere that are currently occupied by substantial quantities of low- and moderate-income people of color. Failure to ensure adequate affordable 2- and 3-bedroom units could potentially constitute a systematic exclusion of families with children. According to 2017 estimates and data available through Claritas, Inc., the census tract immediately adjacent to Suffolk Downs in East Boston contains approximately 1,616 households with children (of 2,493 households) and about one-half of residents have household incomes below \$50,000 (even discounting all potential public housing residents, this would still be upwards of one-third of the census tract).

Furthermore, an influx of higher-income residents, workers and consumers, and the creation of amenities for them, will undoubtedly produce economic impacts on adjoining areas through changes in consumer spending, property values and real estate market activity. The City of Boston and BPDA have not presented strategies for addressing economic challenges or responsibly harnessing economic development to protect those who reside in East Boston today, and such strategies do not separately exist in the Planned Development Area filing. There are no procedural checks in place to actually monitor the furthering of fair housing at Suffolk Downs or in East Boston, and no safeguards to adjust the Planned Development Area if necessary.

The city's development impact fees, or linkage programs, both indicate the need for resources to address the impacts of development and obligate the city to consider other resources. The statutory basis of these programs comes from the fact that these programs "mitigate the impact of large-scale real estate development," implying a clear acknowledgement that such impact exists and also that it is not solved by linkage alone. However, a good start toward financing anti-displacement measures would be dedication of

²⁸ <http://www.bostonplans.org/getattachment/8349ada7-6cc4-4d0a-a5d8-d2fb966ea4fe>

²⁹ <http://www.bostonplans.org/getattachment/0753c2f2-0d0a-478a-a102-b24876c86bbe>

linkage funds at Suffolk Downs toward affordable housing at Suffolk Downs and in East Boston. The proponent, BPDA, City of Boston, Boston Water and Sewer Commission and Commonwealth must also explore other strategies.

The neighborhood of East Boston is simultaneously undergoing a planning process entitled “Plan: East Boston” which will almost certainly result in substantial zoning changes, including levels of density that will remove certain triggers for deeper development review. Leveraged correctly, planning and zoning for both Suffolk Downs and the remaining areas of East Boston could enable substantial new affordable multi-family housing, reduced transportation congestion and increased economic prosperity and stability. However, without thoughtful attention to the economic needs of East Boston residents, planning and zoning could result in the accelerated displacement of many residents, including legally protected classes.

Stakeholders with Regulatory Authority Have Not Demonstrably Attempted to Resolve Risk of Neighborhood Segregation

The BPDA and Boston Zoning Commission have no demonstrated protocols in place to ensure racial equity or prevent racial segregation as a consequence of zoning and planning decisions. Because regulation outside of the base zoning requirements regarding affordable housing and public benefit are essential discretionary decisions by BPDA staff, the BPDA exercises substantial power and is accountable for the success or failure of the project to further fair housing.

Procedural safeguards, a multi-stakeholder commitment to fair housing, and an annual review (or a review coincident with each phase of development at Suffolk Downs) would substantially assist the Agency and Commission in furthering fair housing. These measures can and should be written into the Planned Development Area for Suffolk Downs, and safeguards should include the ability to adjust mitigation to guarantee attainment of fair housing.

The BPDA has certainly demonstrated the personal goodwill of individuals. Simultaneously, the agency has demonstrated a limited understanding of the structural impacts of planning and zoning on protected classes. For example, in FY19 budget the BPDA’s was asked about strategies to prevent racial and economic segregation demonstrated at and by the Seaport. The BPDA noted “the premise [behind questions about the Seaport] is that we have a tool we have not used,” indicated a limitation in authority over private development on private land and an inability to “dictate terms” for “desired social and economic justice outcomes.”³⁰ The BPDA Director also indicated considers he was “fine” with adopting racial equity as a policy but that formal policies did not presently exist.³¹ In the FY20 budget, the Director alluded to laudable trainings relative to implicit bias and staff retreats, but no agency staff identified procedures or data analysis that would further racial equity or fair housing in planning.

The BPDA and Boston Zoning Commission can, in fact, dictate the terms of zoning, of public benefits and mitigation packages, decide whether or not they are satisfactory and approve, conditionally approve or reject them. Additionally, racial integration is not a desired social or economic justice outcome—it is a civil right and legal obligation.

³⁰ <https://youtu.be/SvKmk4TM4r0?list=PLQao0hI2DAg0fygkNltAgCZJHXJjo8e2&t=5137>

³¹ <https://youtu.be/SvKmk4TM4r0?list=PLQao0hI2DAg0fygkNltAgCZJHXJjo8e2&t=11195>

On the Suffolk Downs project, the primary adjustment in planning of housing as a consequence of community feedback has been to reduce the height and alter building type in areas of Suffolk Downs adjacent to Orient Heights, due to concerns from homeowners in the area. While any response to community feedback is appreciated, the proponent and the BPDA should be cognizant of the relative social power and representation of area homeowners. The City should be thoughtful with regards to potential density requirements or limits so that they are consistent or tied to evolving neighborhood zoning regulations that may be established through Plan: East Boston.

Comments on Draft Non-Discrimination and Fair Housing Language of Proponents

The Planned Development Area filing contains language related to a non-discrimination covenant on pages 9-10. This content was authored by the proponent following discussions in December 2018 between the BPDA, proponent and district councilor. The proponent's willingness to collaborate and include such language is greatly appreciated. However, the language included in the PDA filing is presently deficient. Recommended revisions are appended to this comment letter and have been separately communicated to the project manager.

As previously noted, "fair housing" signifies more than the absence of discrimination. A complete and enforceable non-discrimination covenant would nonetheless be a valuable component of a fair housing strategy for Suffolk Downs. In its current form, the language appears to omit several categories of protected classes, notably several covered under Chapter 151B of Massachusetts law. Revised language should include all classes covered under city ordinance and state and federal statute. The mechanisms for enforcement of this covenant should also be clarified to ensure the intended purpose is achieved.

With regards to the broader intent of fair housing, the filing lacks language, procedural checks or other triggers to ensure equitable development or review progress over the course of twenty years. Approval of the PDA would essentially have the city trust in the market to deliver a fully accessible, integrated and representative new neighborhood for Boston. It is critical the city and BPDA establish procedural review for development in the area to ensure equitable growth, including safeguards that allow for adjustment of the PDA regulations or mitigation package if necessary to further fair housing and promote development accessible to all residents, including protected classes. More specifically, the BPDA should institute safeguards to prevent neighborhood segregation that would trigger both public action and amendment to the PDA filing.

Transportation Planning and Mitigation for Suffolk Downs

Transportation is a top concern for East Boston residents, and existing residents are rightfully concerned about how a development at Suffolk Downs and East Boston, as well as ongoing state project and activity at Logan Airport, will impact current traffic conditions. Elements of the pedestrian and cyclist experience at and through Suffolk Downs have evolved through productive dialogue, while other aspects, including an overreliance on Single Occupancy Vehicles and car-oriented planning, have not adequately adjusted despite comments from public agencies and community members.

City, Proponent and Community Should Continue to Collaborate on Route of Connective Paths and Trails, Shuttle Services

The proponent has thoughtfully engaged around pedestrian and bicycle infrastructure and continues to collaborate with East Boston groups, including Friends of the East Boston Greenway. Such collaboration should continue and be memorialized in the PDA as a dedicated working group with community representation, and the language for such collaboration should be shared with relevant groups prior to finalizing the PDA. The proponent has taken other positive steps within and outside of the PDA filing itself, including advocacy for the Red-Blue Connector, a critical priority for East Boston's elected delegation. Additionally, modest commitments toward electric vehicle charging stations and a new shuttle service are meritorious interventions in transportation planning.

Project Appears Geared Toward Single Occupancy Vehicles

When considering transportation options for Suffolk Downs, it is urgent to ensure growth enables transportation solutions without exacerbating burdens. The proponent is seeking to develop substantial new housing and commercial space in an area blighted with traffic congestion. The project is situated between two MBTA Blue Line stations, but appears to be heavily reliant on single occupancy vehicles. The project is currently estimated to generate between 65,276-76,8102 vehicle trips per day, depending on assumptions in modeling. At full-build, there will be an estimated 15,250 parking spaces. The bulk of transportation-related investment is intended to support cars in moving through key regional exchanges.

Prior to project approval by the BPDA, the city should require a reduction in proposed parking. Overbuilding parking at Suffolk Downs will increase vehicle trips and traffic congestion, reduce economic flexibility of proponent to meet the needs of East Boston. Approving a parking ratio nearly double the city's recommended guidelines would send a perverse signal to all other development in the City of Boston at a time when the City is seeking to shift more residents and workers to public transportation, cycling and walking. The city and proponent should also seek greater utilization of electric vehicles (EVs) and EV charging on site given the likely transition over the next twenty years to cleaner vehicles in the region.

It is notable that, in addition to local concern over traffic congestion, state agencies have expressed concerns with the current proposal (visible starting on page 297 of the state's [Certificate for Suffolk Downs Draft Environmental Impact Report](#)).³² MassDOT has noted that inbound Route 1A expansion "may result in additional cut-through traffic... in East Boston (south of Neptune road) during the AM peak." MassDOT has also noted that the proposal appears geared towards single-occupancy vehicles and, citing delays experienced today by commuter buses, requested the proponent look at rerouting North Shore buses to make a more transit-friendly proposal.

Approximately \$50m of the proposed public benefits for Suffolk Downs are off-site roadway investments (DEIR 13). Additionally, proposed parking exceeds even the proponent's estimate of peak parking by about 500 spaces (DEIR 14) and far exceeds the city's recommended parking ratio. Some commenters

³²<https://eeaonline.eea.state.ma.us/EEA/emepa/mepacerts/2019/sc/eir/15783%20DEIR%20Suffolk%20Downs%20Redevelopment.pdf>

(e.g. the Metropolitan Area Planning Council) have suggested transportation mitigation should go towards public transit, e.g. the MBTA Blue Line, or that the proponent look at alternatives to Route 1A expansion.

Comments by MassDOT, the Boston Transportation Department and other stakeholders call attention to congestion issues, impact on East Boston neighborhood streets, excessive parking proposed for Suffolk Downs and other matters. The project's emphasis on off-site road improvements may limit the ability to address transportation equity and fair housing issues affecting protected classes in the City of Boston while increasing vehicular traffic. Furthermore, the impact of inbound expansion of Route 1A could be significant for East Boston residents even with a modified plan.

Project Should Include a No-Build Analysis for Route 1A Expansions with Alternative Investments in Housing or Transportation

The Project should include a no-build analysis for Route 1A Expansions with alternative investments in housing or transportation. All public and quasi-public agencies should consider whether the overall balance of mitigation is appropriate or if public resources should be introduced or rededicated to shift private funds toward essential services. For example, MassDOT should consider, in conjunction with peer agencies, whether any state exactions from the project proponent for off-site roads may impede the ability of the proponent and city to jointly provide for the transportation or housing needs of East Boston residents and protected classes of residents that could otherwise be addressed through mitigation.

Stakeholders should evaluate shifting proposed mitigation from investments in Route 1A and off-site road improvements to public transportation, including increased service capacity on the Blue Line, improved and accelerated bus service, and financial commitment to the Red Blue Connector. Alternatively, stakeholders could memorialize a commitment that, in exchange for less substantial transportation mitigation from the proponent, allows for greater investment in affordable housing.

Investing in housing is not simply a housing investment: displacement due to a lack of affordable housing will inevitably *increase* traffic congestion as many displaced residents of Boston will likely return to the state's capital for work, albeit with a longer commute. The Commonwealth's economy remains highly centralized. The Department of Housing and Community Development's draft Analysis of Impediments to Fair Housing Choice notes 54% of the Commonwealth's jobs are housed in the Greater Boston region.³³

City and Proponent Should Advocate for State Transportation Commitments

Finally, the city and proponent should continue to work jointly to advocate for state action on transportation. State commitments to the Red-Blue Connector, the MBTA Blue Line or tolling changes at Sumner Tunnel would ease burden on residents of East Boston and other Environmental Justice communities in the area. With regards to the Sumner Tunnel, it's worth noting the current toll structure is less than the MBTA's base fare (even prior to recent increase). As the state continues to debate smarter

³³ <https://www.mass.gov/files/documents/2019/05/09/DraftAI4-10-19.pdf>

and variable tolling approaches, simply adjusting the tolls to match the MBTA's base fare would send a more logical and equitable policy signal and encourage mode shift.

Public / Private Realm

Open Space Should Be Counted, Protected in Perpetuity and Affirm Civil Liberties

The proponent is developing 109 acres of land in the City of Boston and building a new neighborhood. Clarity on public rights, access and ownership of public spaces must be established prior to project approval. Quantity of active open spaces and green spaces should specifically be outlined and memorialized. For open spaces, public ownership or, at minimum, a deed restriction, is necessary to ensure full and permanent enjoyment of public spaces. A restriction, if utilized, should not only protect the space itself, i.e. as a conservation restriction, but also certify and guarantee free speech and civil liberties equivalent that of public parks. Such rights should also be guaranteed for public roads and sidewalks if not across the site in its entirety.

Comments from Carrie Marsh, the Executive Secretary of the Boston Parks and Recreation Commission, highlight numerous issues that must be resolved prior to project approval.³⁴ Specifically, BPRC urges protection in perpetuity, development of all open space during Phase 1, a needs assessment based on projected users, clarification about regulatory compliance and numerous other issues. These comments thoughtfully address a range of crucial matters and should be factored heavily into project design and approval.

Outside of forward-phasing open space development, memorializing public benefit in a separate document outside of the PDA, with a community organization as co-signer to the benefit, would protect pertinent benefit from future amendment. Experiences with comparable Planned Development Areas in South Boston have shown an erosion of public benefit over time unless specifically protected through binding restriction, such as the conservation restriction held on the site formerly owned by General Electric.

BPRC also comments in their 2018 letter that, at the time, the proponent did not estimate the number of residents or users. BPRC projected 10,000 to 40,000 users based on 10,000 units of housing in East Boston and Revere. The proponent separately commissioned a Fiscal Impact Analysis from RKG Associates in June 2018. In this study, based on Program A (the "Amazon" scenario, i.e. with less housing) the proponent estimated 6,615 residents, including 214 school-aged children, based on 4,295 units of housing, or a household size of roughly 1.54. The proponent has retained an estimated household size of between 1.5 and 1.6 in the new program of roughly 7,223 units in Boston for a total of approximately 10,000 units of housing on site. This would suggest at least 16,000 residents, including at least 314 school-aged children, plus potential users who work on-site and other users who are residents of East Boston and Revere.

³⁴ <http://www.bostonplans.org/getattachment/0753c2f2-0d0a-478a-a102-b24876c86bbe>

The proponent's projection of residents are likely too low, underestimating impact and need. As noted, for the purposes of furthering fair housing and neighborhood integration, the proponent should ensure adequate affordable family housing and this would increase overall users regardless of the accuracy of the current estimate. Given the balance of residents and other users and need to increase target household size, open spaces at Suffolk Downs should be planned for upwards of 20,000 residents on site. East Boston residents today have also specifically identified a need for increased recreational space, with additional soccer field in particular being highly desired by the community.

In the PDA filing, the proponent should distinguish green spaces and a commitment to greenspace specifically from other open spaces. Recent moves to highlight passive as opposed to active open spaces are helpful, but the actual commitment to green space is relevant in a neighborhood that is vulnerable to climate change, burdened by air pollution and disproportionately lacking tree canopy. Tree planting is presently encapsulated in the PDA filing.

Action by the BPDA to secure public ownership and management of open space at Suffolk Downs would facilitate the resolution of comments filed by the Parks and Recreation Commission. The Agency has recently highlighted examples of privately managed open space, notably A Street Park. While relevant as a use case, this park is 1.6 acres in size and not comparable in scale, so additional consideration is warranted as to both ideal arrangement and logistical needs that may differ in a substantially larger site.

Open space in other Planned Development Areas, such as Seaport Square, has atrophied with PDA amendment revisions. Ultimately, authority to modify any open space commitment should be severely limited and divorced entirely from administrative economic development policy which may vary over time. The BPDA and City should evaluate whether public ownership could facilitate state or federal support and allow for private mitigation to be expended on other public benefits.

Civic Space Has Expanded, Should Be Codified in Separate Agreement

The proponent has increased civic space from 2,500 square feet to 40,000 square feet in the City of Boston. The change is notable and appreciated. Regardless, the BPDA, Office of Neighborhood Services and other stakeholders should continue to consider and take input from East Boston and other stakeholders as to whether this is adequate civic space to create, fully enrich and serve a neighborhood. Recently large-scale developments in the Seaport or in other areas such as Assembly Row lack requisite neighborhood amenities, and as noted, the evolution of some developments in Boston have failed to preserve civic and open space concessions fought for by community residents.

In concept, it is logical to allow for some level of flexibility in the functions of civic space as needs evolve and additional desired uses emerged. However, *any use deemed necessary* and *minimum overall civic space square footage* should be codified in a community agreement established separately from the Planned Development Area filing. The BPDA should be cognizant of a variety of necessary and requested uses, some of which include community meeting space, childcare, jobs training, health care and performance space. Childcare may be separately required through the zoning code, and as such it may be valuable to count this as a separate use.

Community residents in East Boston have asked whether the proponent could deliver land as mitigation, either to increase civic spaces, to provide for cooperative (community-owned) housing and or to provide for basic municipal services. The city may also want to request land as mitigation for the provision of municipal services, given recent dialogue and lessons in other areas, including South Boston, about the provision of police and fire services in the Seaport. Additionally, the city should continue to evaluate the need for public schools in East Boston and at Suffolk Downs. The proponent should specifically meet with Boston Public Schools in the near future and as adjustments are made to projected school-age children on site.

The East Boston Social Center, East Boston Health Center, Friends of Belle Isle Marsh and other community organizations have made valuable requests for early education and learning space, space for health care facilities and a nature center to enhance safe and ecologically responsible visitor experience of the marsh. Other community organizations have requested land be made available for cooperative housing or other creative community-owned housing or enterprise.

Ownership and Operation of Roads, Trails and Corridors Should Remain a Public Function

The city is obliged to provide equal public services to all residents. Creating a private neighborhood with either superior or inferior services would at best contravene city policy and contributes to a concerning erosion of the public sphere that may have lasting consequences. Regardless, as noted previously, civil liberties and free speech should be guaranteed in public spaces through a binding legal agreement regardless of ownership of roads or other transportation conduits.

Neither the BPDA nor the proponent have adequately justified widespread private ownership of key public functions. Public acquisition, maintenance and protection could be a condition of project approval, would open up capital and operational mitigation for other uses and may allow for a greater diversity of resources being invested in the project. Furthermore, allowing for private ownership of roads, open spaces, etc. may render the project ineligible for certain state grant funding for public works. The City and proponent should exercise extreme caution and evaluate whether ensuring public ownership would in fact better accommodate public and private goals for the project, including financial feasibility.

Environment and Climate Resiliency

Project Would Improve Connectivity of Neighborhood & Improve Access to Recreational Spaces

The project as proposed would improve the connectivity of Suffolk Downs to and through existing East Boston neighborhood and improve access to recreational spaces. The proponent has received comment and thoughtfully elaborated gradual changes to increase bicycling amenities, cycle tracks, design of the East Boston Greenway, connective measures from Constitution Beach to Revere Beach, and design for the link from Orient Heights Station to Winthrop via Belle Isle Bridge. The proponent should continue to engage as requested and as detailed below, but should be applauded for existing efforts and any further commitments (including soccer fields eagerly anticipated by the East Boston community). Notably, the Friends of Belle Isle Marsh have also suggested the proponent support local pathways and boardwalks

within the park, specifically highlighting the need for a functional Lawn Avenue boardwalk to the Main Reservation on Bennington Street.

Project Should Memorialize Commitment to Continued Resident Involvement

The Planned Development Area should memorialize a commitment to interactive stakeholder involvement in open space planning, including organizations such as Friends of the East Boston Greenway / Greenway Coalition, Friends of the Belle Isle Marsh, GreenRoots, Harborkeepers, Beachmont Improvement Committee, the Boston Parks and Recreation Department, City of Revere and other entities in East Boston and Revere expressing a desire to engage. The BPDA and proponent should share draft language codifying this commitment to an intercity and community working group with the relevant community organizations prior to project approval.

Changes in Plan Have Reduced Greenhouse Gas Emissions; Proponent Should Continue to Pursue Microgrid Development

Since the Draft Environmental Impact Report filing, the proponent have engaged with the Department of Energy Resources and the BPDA. In public presentations, the proponents have demonstrated an understanding of the need to reduce energy consumption and energy use intensity. Based on the initial project filing, the project could have emitted as much as 72,554 - 90,230 tons of carbon dioxide or equivalent pollutants annually. The proponent has indicated subsequent changes, including adoption of Passive House and Energy Positive (E+) standards in some buildings, coupled with the large shift to “Program B” (residential) have commendably reduced the range of emissions to between 45,159 - 77,061 tons annually. The project proponent has made a commitment to solar development, but should continue to seek greater siting of renewable energy on site. Additionally, any emissions estimates not reflective of parking may warrant, as noted, a reexamination of parking or transportation planning on-site.

The project proponents have alluded to, but do not describe, potential legal and financial constraints around local energy microgrids. Proponents should detail barriers, many of which may be resolvable. To the extent there are legal constraints, the District Councilor’s office would be pleased to work with the East Boston delegation and members of the General Court to address related issues. Notably, House Speaker Robert DeLeo and Telecommunications, Utilities and Energy Chair Thomas Golden have recently filed *An Act Relative to GreenWorks*.³⁵ This legislation would make funding available for microgrid projects “located on the property of at least two neighboring municipal buildings” or climate resiliency projects “located on public land or on public leasehold, right-of-way or easement,” perhaps bolstering the case for ensuring a public role in the ownership or management of portions of the Suffolk Downs site, or for microgrid development tied to municipal basic services on site.

Project Should Demonstrate Preparedness for Sea Level Rise and Extreme Precipitation

The project is currently leveraging two primary strategies for preparing for climate resiliency: constructing or designing and enhancing a network of open spaces and mitigation payments to Boston

³⁵ <https://malegislature.gov/Bills/191/HD4234/>

Public Works and Boston Water and Sewer. The proponent should ensure the project is fully prepared for both sea level rise and extreme preparation, and that adequate preparations are taken to protect residents from any climate-related damages to nearby industrial facilities, including the Global Oil terminal in Revere. The Friends of Belle Isle Marsh (FBIM) have also requested that an independent study be completed to help understand the effects of climate change on the salt marsh as a whole and guide climate adaptation strategies in order to further resiliency while preserving the local ecosystem. To that note, FBIM have also requested an assessment of wildlife onsite.

Economic Development and Job Creation

Suffolk Downs is seeking to attract a wide array of employers for uses ranging from residential, office, research and development, market, entertainment, food, service industry and hotel. The economic development program would certainly expand Boston's economy. In order to truly deliver "diversification and expansion" of Boston's economy (the requisite public benefit under Article 53 of Boston's zoning code), the project must provide economic opportunity to a wide range of residents. The city's role in this development should be to ensure jobs and economic benefit accrue to a range of Boston residents reflective of Boston's diversity.

Community members have testified as to their exclusion from the economy or economic boom due to language barriers, lack of upfront capital, immigration status and other factors. Residents have also expressed the need for financing and business partnership for cooperative enterprise and desired space for cooperative business development. Members of organized labor, including residents, former residents and non-residents, also testified as to both the desire for living wage jobs and the need for greater affordable housing in order to be able to live in the communities they are building or otherwise employed in.

The proponent and BPDA should ensure all relevant uses are included in the PDA, zoning and planning. Educational facilities, health centers and health services, currently major employers in East Boston and likely necessary on-site itself, should be included in the PDA.

Lease Terms for Local Entrepreneurs; Space for Recruitment/Training

The proponent has committed 10% of retail space to be reserved for local businesses with "flexible lease terms." Flexible lease terms are presently undefined and the proponent and the City's Economic Development staff should jointly develop these terms in conversation with East Boston entrepreneurs in order to ensure they serve the intended purpose of providing economic opportunity and affordable commercial spaces. The city and BPDA should ensure the 10% commitment is binding after any initial retail lease and all retail leases transition. Additionally, the proponent should ensure "flexibility" includes a commitment to long-term leases for local businesses that desire them, as local and small businesses lack long-term predictability or may operate on month-to-month arrangements.

More recently, the proponent has alluded in public presentations to use of spaces on-site at Suffolk Downs for jobs training and recruitment areas, including as touchpoints for entry into union pre-apprenticeship programs. These are positive developments and should be further clarified in the PDA

filing, in conversation with the Office of Economic Development, and in the strategic deployment of mitigation funds and payments to the Neighborhood Jobs Trust.

Equity and Inclusion Strategies; Limited English Proficiency Residents

Meaningful action to affirmatively further fair housing should examine economic opportunity in the labor market that can support economic stabilization of protected classes and address impediments to fair housing. Recent experience by Spanish-speaking East Boston residents with Encore Boston Harbor shows how language access has created barriers to employment for residents who are neighbors to the proposed Suffolk Downs development.

A commendable report published by the Office of Workforce Development and the BPDA in March 2019 entitled “Untapped: Redefining Hiring in the New Economy” further details the need to invest in ESOL programs as one of its.³⁶ An additional BPDA report, “Demographic Profile of Adult Limited English Speakers in Massachusetts,” highlights clear pay differentials between English Proficient workers and those with Limited English Proficiency, as well as concentration toward industries with lower-paying work.³⁷

The proponent should financially contribute toward ESOL programming that is tied to a concerted economic and workforce strategy. This kind of upfront mitigation and jobs training should be leveraged to ensure the Suffolk Downs project benefits East Boston residents. Additionally, the proponent and city should engage and demonstrate partnership with a variety of stakeholders, including Action for Regional Equity, the Center for Cooperative Development and Solidarity (CCDS), the Massachusetts Coalition for Occupational Safety and Health, the Immigrant Worker Center Collaborative, East Boston Chamber of Commerce, Latino Merchants Association and IAM local 1726 (located in East Boston), among others.

Economic Development Chief Barros commented during an April 26, 2019 hearing about the administration’s desire to expand Boston’s economic development center³⁸ to outer neighborhoods. This would be a boon to East Boston. Several of Boston’s economic development “outposts” and physical offices for union pre-apprenticeship programs are located in the Roxbury and Dorchester neighborhoods, relatively distant from the East Boston area. The ability to localize and tailor services and recruitment strategies in East Boston and for Suffolk Downs specifically would help achieve admirable citywide goals.

The Office of Economic Development’s Director of Equity and Inclusion, Celina Barrios-Millner, also commented on the Office’s experience engaging the construction industry and building trades.³⁹ The continued of the Office to worker preparation and training well in advance of construction start date, particularly with regard to advancing diversity in core construction crews, would be valuable and the proponent should engage fully in these efforts. To support equity in both temporary and permanent employment, the Office of Economic Development and Office of Workforce Development may want to

³⁶ <https://owd.boston.gov/wp-content/uploads/2019/03/Untapped-Redefining-Hiring-in-the-New-Economy.pdf>

³⁷ <http://www.bostonplans.org/getattachment/dfe1117a-af16-4257-b0f5-1d95dbd575fe>

³⁸ <https://youtu.be/IE2FuxvlsuA?t=2353>

³⁹ <https://youtu.be/IE2FuxvlsuA?t=2533>

consider paired strategies that involve language and skills-building that allow for expanded opportunities in the near-term and pathways to higher-paying careers down the line.

The proponent should meet with Economic Development and the district councilor prior to construction to discuss (1) opportunities for economic development and training spaces in East Boston or at Suffolk Downs, (2) contracting opportunities that will be available during and after construction, in order to develop an appropriate training pipeline and (3) opportunities for proponent to support training initiatives to support diversity in employment and hiring and any other issues identified by Economic Development.

Project Commitments and Mitigation

Binding Agreements Must Be Subject to Community Review, Presented Concurrently with Planned Development Area

Community residents and organizations have requested and are requesting the Boston Planning and Development Agency allow for concurrent review of the Cooperation Agreement, Transportation Access Master Plan, DIP agreement and other binding legal documents with the Planned Development Area prior to a vote on the PDA's approval. There is no substantive reason why the BPDA cannot facilitate this process. In fact, doing so is critical to ensuring Boston residents can actually know what binding conditions development at the largest project in Boston's history are subject to.

Furthermore, Boston's zoning code specifically allows for conditional approvals. Should the BPDA's director and its board find it useful and necessary to allow the project to advance, they are legally and logistically capable of signalling the overall goodwill toward the project while requiring additional actions. For example, a conditional approval could affirm the general direction of the cooperation agreement and require a second board vote of approval, with public hearing, to approve the document itself.

Such agreements will be devised well in advance of proposed construction dates, and transparency and full consultation of the East Boston community and the East Boston legislative delegation need not delay building permits, construction schedules or other critical milestones.

Mitigation Must Prioritize Full Inclusion of Protected Classes

In doing due diligence on areas such as transportation infrastructure and climate resiliency, the City of Boston appears to, based on comments and supplemental information requests, have sought substantial investment from the project proponent into public works and climate resiliency. The city's work on climate and transportation are commendable and the private sector should play a role in advancing the public good during development projects. However, requests for infrastructure expenditures or mitigation that benefits the city by reducing local capital or operating expenditures must be secondary to such mitigation as is necessary in order to prevent housing segregation or a disparate impact against one or more protected classes.

To put it plainly: if there is a limited pool of private dollars that can be expended as mitigation, the city is obliged to dedicate these funds toward ensuring adequate housing for its residents, or otherwise accounting for these needs with a targeted plan for public investment that addresses the apparent need.

Choices around how mitigation dollars are spent or endorsement of private management of public spaces to facilitate cost savings are discretionary policy decisions. For example, *the city could opt to require public ownership or maintenance of roads and parks as a condition of zoning approval if it felt that private funds were best expended on housing.* Indeed, doing so would free up millions of dollars that could be leveraged to finance additional affordable housing on site and in East Boston. Maintenance of open spaces alone is estimated by the proponent to cost roughly \$500,000 annually, which could otherwise be used to fund an additional affordable unit on-site each year.

Securing Fair and Affordable Housing through Dedicated Revenue, Cost Saving

<u>Source</u>	<u>Stakeholders</u>	<u>Detail</u>	<u>Amount</u>
Dedicate 100% Linkage to East Boston & Suffolk site	City and Neighborhood Housing Trust	Creation of East Boston housing fund	\$4.45m (Phase 1B) to \$81m at full build out
Dedicate Net Revenue	City	City	\$5.15m (phase 1B) - \$33.8m annually
Existing Local Option Taxes	City	City allocates local option sales fees	~\$1.9m / year, included above
New 1% Fee on Retail Transactions	Proponent includes commitment in retail leases	Leases include commitment from retailers to housing	TBD
City Maintains Open Space	City / Proponent	Relieve proponent of open space expenses	\$500,000/year
City Waives Rental Registration Fees	City / Proponent	Relieve proponent or lessee of expense	TBD / year
Alternative Water and Sewer Finance Mechanism	BWSC / Boston Public Works / Proponent	Support water and sewer infrastructure expansion through systems-benefit charge on Phase 1B water/sewer bills. Municipality could also issue bonds.	TBD
MassWorks: Funding for Public Roads, water & sewer	City and HYM engage EOHED	Grant application for roads, water/ sewer	TBD, total cost ~\$47m
Proposed GreenWorks program	City and HYM engage General Court / MA House regarding bond funding	Proposed state bonding program for clean energy / resiliency funding	TBD, cost estimated at \$6.6m just for Tide Gates, Pump Stations
Shift Resources from Off-Site Transportation Benefit / 1A investments	MassDOT / MEPA / Proponent / BTM	Reinvest planned road changes to housing or public transit, or fund thru MassDOT's CIP	TBD, estimated costs > \$25m (1A) - \$50m (offsite roads)

Project Requires Amendment to Meet Standard for PDAs and Fair Housing

The Planned Development Area process is governed by [Section 80-C](#) of Boston's zoning code and by a [2014 Boston Revelopment Authority policy](#). Suffolk Downs is subject to additional guidelines pursuant to Article 53 of the Zoning Code. Section 53-49 specifically offers modest public benefit guidelines.

There are five basic criteria for approval of PDAs under 80-C, which can be summarized as:

- The PDA matches the **base or underlying requirements**, for example, density of development, PDAs are **allowed in the area** and **geographically conform** with their district or neighborhood
- The PDA meets the **public benefits** & other criteria required by the underlying zoning
- Finally, the PDA as a whole must **“not be injurious to the neighborhood or otherwise detrimental to the public welfare, weighing all the benefits and burdens.”**

After the comment period on a Planned Development Area, and if the BPDA Director is supportive, the PDA proceeds to a vote at the BPDA board and the Zoning Commission. The BPDA board has [three options](#): approve the plan, conditionally approve the plan, or disapprove the plan. If substantial PDA amendments are proposed later, they go back to the BPDA board and zoning commission, or, for minor amendments, just the BPDA board.

In December 2018, the proponent petitioned the Boston Zoning Commission to amend the base zoning code, specifically increasing the maximum Floor Area Ratio. At that time, the proponent, BPDA and district councilor agreed, during public testimony, to jointly support the FAR/density increase provided that the Planned Development Area establish fair housing protections and include pertinent language. To their credit, the proponent provided a draft of fair housing language in the PDA submissions. *Completion of this non-discrimination language and relevant mitigation planning and procedural oversight in conjunction with the BPDA and city agencies is necessary to ensure the attainment of fair housing at Suffolk Downs.*

PDAs require public benefits as a condition of approval. The published BPDA guidance on Planned Development Areas indicate that PDAs must offer “significant mitigation and public benefits for the immediate area and surrounding neighborhood.”⁴⁰ Under the current public benefit guidelines for Article 53--which are themselves inadequate--the project would only clearly qualify through enhancements to open space and aesthetic character and would not clearly provide significant benefits to the surrounding neighborhood.

As noted, due to a variety of factors including the income levels of East Bostonians, at this time it is unclear whether the project will provide “Affordable Housing available to East Boston and Boston residents” pursuant to Article 53-49. The project will create jobs, but it is unclear without further guidelines or clear mitigation plans whether the proposal will “diversify” or expand “job opportunities” given Boston's booming economy, the established presence of relevant sectors in the city, and lack of clarity about Boston residents' access to jobs at Suffolk Downs given the current mitigation package, particularly as relates to minority and Limited English Proficiency residents.

⁴⁰ <http://www.bostonplans.org/getattachment/e6644505-ce9c-4e42-b591-40e6c6049d63>

Finally, the PDA as a whole must “not be injurious to the neighborhood or otherwise detrimental to the public welfare, weighing all the benefits and burdens.” Suffolk Downs has the *potential* to provide incredible benefits to the neighborhood, and this is achievable through a reconfiguration of the housing and mitigation planning. However, at present, the reasonable risk of neighborhood segregation and the unmitigated displacement impact to East Boston would be, on balance, injurious. Even if the BPDA ruled that the current proposal met all PDA standards, the BPDA board would be knowingly in violation of fair housing and potentially exposed to legal liability.

As such, the PDA should not advance without clear commitments from all stakeholders and dedicated resources and planning to further fair housing at Suffolk Downs and in East Boston. Such planning should fully engage and involve the incredible talent and intellect present at the City of Boston’s housing and economic development agencies. Such plans should also be informed by the demographic data and economic limitations facing legally protected classes in Boston and East Boston today, and economic opportunities that can be made available to them.

The project proponent includes a high-road team of excellent reputation, clearly committed to transform the site at Suffolk Downs. Continued partnership with the city, state and the East Boston community will no doubt result in a remarkable and visionary project.

Proposed Revision to Non-Discrimination and Fair Housing Covenant (PDA 9-10)

As a requirement for the issuance of the first building permit for the construction of any building within the Master Project, the following covenant (the “Non-Discrimination and Affirmatively Furthering Fair Housing Covenant”) shall be recorded in a form approved by the General Counsel of the BPDA:

- A. Specific obligations. The Proponent assumes the following duties with respect to the Master Project and each Phase:
1. Obligation not to discriminate. The Proponent, and its successors-in-interest as to the PDA Area or any part thereof, shall be subject to all federal, state and local fair housing laws and shall not discriminate in the rental, sale, advertising, marketing, and/or discriminate in the terms and conditions of housing, provision of facilities or services, or withhold or otherwise deny or make housing unavailable, on the basis of a person’s membership in a protected class, based upon the person’s race, creed, religion, color, national origin, ancestry, age, sex, sexual orientation, gender identity, disability or handicap, familial status, children, marital status, source of income, receipt of public assistance, rental assistance or housing subsidy, veteran status, genetic information and any other protected class that is currently recognized under state, federal or local law, or may become recognized under such laws as amended. Without limiting the foregoing, the Proponent and its successors-in-interest are expressly prohibited from discriminating against, refusing to lease to, or terminating the tenancy of, a voucher holder or recipient of rental assistance under Section 8 of the United States Housing Act of 1937, the Massachusetts Rental Voucher Program, or other federal, state, or local rental assistance program, because of the status of the tenant or prospective tenant as such a holder or recipient of public benefits, rental assistance, or housing subsidy program or because of the requirement of such public assistance, rental assistance or housing subsidy program.
 2. Obligation to Affirmatively Further Fair Housing. Pursuant to the Fair Housing Act, 42 U.S.C. 3608 (e) (5), all transactions affecting or respecting the installation, construction, reconstruction, maintenance, rehabilitation, use, development, sale, conveyance, leasing, management, occupancy or administration of all property within the PDA Area, or any portion thereof, shall be conducted in a manner that affirmatively furthers the policies of fair housing as set forth in the Fair Housing Act, by, *inter alia*, promoting access to integrated, non-discriminatory housing and employment opportunities in East Boston and the City of Boston as a whole. The Proponent and its successors in interest shall comply with City of Boston Linkage and Inclusionary Development requirements. Further, no policy or practice of the housing provider shall discriminate in any manner prohibited by local, state or federal law. Any violation of local, state, or federal anti-discrimination law committed in the installation, construction, reconstruction, maintenance, rehabilitation, use, development, sale, conveyance, leasing, management, or occupancy of any real property within the PDA Area

shall also be deemed a violation of this Non-Discrimination and Affirmatively Furthering Fair Housing Covenant.

3. Affirmative marketing requirements. All housing developed at this site shall be affirmatively marketed to members of all classes protected by the Federal Fair Housing Act (42 U.S.C. § 3601 et seq.), the Massachusetts Anti-Discrimination Law (M.G.L.c151B), and/or the Boston Fair Housing Ordinance (Boston Code of Ordinances, Chapter 10-3) The Proponent agrees for itself, and its successors and assigns, that during construction of the Master Project and thereafter, when the Proponent, or its successors and assigns, develop and carry out a program of advertising for the sale and/or rental of the residential portion of the Master Project, the Proponent, and its successors and assigns, shall include in advertising therefor (including signs), the legend “An Open Occupancy Building,” in type or lettering of easily legible size and design. The word “Project” or “Development” may be substituted for the word “Building” where circumstances require such substitution. It shall be unlawful to make, print or publish, or cause to be made, printed or published any notice, statement or advertisement with respect to the sale or rental of housing that indicates any preference, limitation or discrimination based on protected class status. All units shall be subject to the City of Boston Affirmative Marketing requirements.
 4. Requirements for project advertising. The Proponent further agrees for itself, its successors and assigns, that during construction of the Master Project and thereafter, the Proponent, and its successors and assigns, shall include in advertising for the sale or rental of any residential portion of the Master Project or any portion thereof, a statement to the effect that (a) the Master Project is open to all persons without discrimination on the basis of race, creed, religion, color, national origin, ancestry, age, sex, sexual orientation, gender identity, disability or handicap, familial status, children, marital status, source of income, receipt of public assistance, rental assistance or housing subsidy, veteran status, genetic information and any other protected class that is currently recognized under state, federal or local law, or may become recognized under such laws as amended; and (b) there shall be no discrimination in public access and use of the Master Project to the extent that it is open to the public.
- B. Applicability of this Covenant. In addition to the Proponent and its successors in interest as to the PDA or any part thereof, this Non-Discrimination and Affirmatively Furthering Fair Housing Covenant shall apply without limitation to owners, lessors or sublessors, real estate brokers, assignees or managing agents of publicly assisted or multiple dwelling or contiguously located housing accommodations or other covered housing accommodations, or other persons having the right of ownership or possession or the right to rent or lease or sell such accommodations, or any agent or employee of such person or organization of unit owners in a condominium or housing cooperative.

- C. Procedures in case of sale or transfer of property within PDA Area. The foregoing Non-Discrimination and Affirmatively Furthering Fair Housing Covenant shall be included in a recorded declaration or other recorded document that is binding with respect to the PDA Area and Master Project. Each and every contract, deed or other instrument hereafter executed conveying the Master Project or PDA Area, or any portion thereof, shall expressly provide that such conveyance is subject to this Non-Discrimination and Affirmatively Furthering Fair Housing Covenant, provided, however, that the covenants contained in this Non-Discrimination and Affirmatively Furthering Fair Housing Covenant shall survive and be effective regardless of whether such contract, deed or other instrument hereafter executed conveying the PDA Area or Master Project or any portion thereof provides that such conveyance is subject to this Non-Discrimination and Affirmatively Furthering Fair Housing Covenant. The Proponent and/or any of its successors in interest shall notify the BPDA and City of Boston in writing of any transfer, sale or exchange of the PDA Area or Master Project, or any portion thereof, and notify in writing and obtain the agreement of any buyer or successor or other person acquiring the PDA Area or Master Project, or portion thereof, that such acquisition is subject to the terms of this Non-Discrimination and Affirmatively Furthering Fair Housing Covenant. At the time of the closing, the Proponent and/or any of its successors in interest shall provide a copy of such writing and agreement to the BPDA and City of Boston. The BPDA or the City of Boston may void any sale, transfer or exchange of the PDA Area or Master Project, or portion thereof, if the buyer, successor or other person fails to assume in writing the requirements of this Non-Discrimination and Affirmatively Furthering Fair Housing Covenant. The Proponent and/or any of its successors in interest shall not execute any other agreement with provisions contradictory to, or in opposition to, the provisions hereof, and in any event, the requirements of this Non-Discrimination and Affirmatively Furthering Fair Housing Covenant are paramount and controlling, and supersede any other requirements in conflict herewith.
- D. Enforcement of this Covenant. It is intended and agreed that the covenant in this Non-Discrimination and Affirmatively Furthering Fair Housing Covenant shall be covenants running with the land, binding to the fullest extent permitted by law and equity for the benefit and in favor of, and enforceable by, the BPDA, its successors and assigns, and the City of Boston, both for and in its or their own right and also to protect the interest of the community and other parties, public and private, in whose favor or for whose benefit the covenants have been provided, against the Proponent, its successors-in-interest as to the PDA Area or Master Project, or any part thereof, and any party in possession or occupancy of the PDA Area or Master Project, or any part thereof, provided that for purposes of any breach of the non-discrimination covenants and any enforcement thereof, each parcel or unit within the PDA Area (including without limitation any individual residential units that may be created and sold), and each owner and any party in possession or occupancy, shall be treated as separate from any others, with each such owner or party to be responsible for its own compliance and actions with respect to its own portion of the PDA Area; provided further that under no circumstances may the Proponent, its successors in interest, or any other party herein referred to, delegate, assign or otherwise transfer to any other

person or entity its own responsibility to comply with this Non-Discrimination and Affirmatively Furthering Fair Housing Covenant. It is further intended and agreed that the Non-Discrimination and Affirmatively Furthering Fair Housing Covenant shall remain in effect with respect to the Proponent, and its successors in interest with respect to the PDA Area or Master Project, or any part thereof, without limitation as to time. The restrictions contained in this Non-Discrimination and Affirmatively Furthering Fair Housing Covenant are intended to be construed as an affordable housing restriction as that term is defined in Section 31 of Chapter 84 of the Massachusetts General Laws, and which has the benefit of Section 32 of said Chapter 184 of the Massachusetts General Laws, such that restrictions contained herein shall not be limited in duration by any rule or operation of law but rather shall run in perpetuity.

- E. Remedies in case of default. For any violation of this Non-Discrimination and Affirmatively Furthering Fair Housing Covenant, the BPDA or the City of Boston may declare a default effective on the date of such declaration of default, and may apply to any court, state or federal, for specific performance of this Non-Discrimination and Affirmatively Furthering Fair Housing Covenant, or any other remedies at law or in equity, or take any other action as may be necessary or desirable to correct noncompliance with this Covenant, including seeking an order to void or require sale or other transfer of property in the PDA Area or Master Project by the person or persons in breach or default. Persons who reside in and/or are employed in, and applicants for housing or employment in, the PDA Area and Master Project, or part hereof, are intended third-party beneficiaries of this Non-Discrimination and Affirmatively Furthering Fair Housing Covenant and shall be entitled, for any breach of this Covenant, and in addition to all other remedies provided by law or equity, to enforce specific performance of obligations under the Covenant. In the event of a default or breach of the Non-Disclosure and Affirmatively Furthering Fair Housing Covenant, the person or persons in breach or default shall reimburse the BPDA, City of Boston, or other third-party beneficiary plaintiffs for all costs and attorneys' fees incurred associated with such breach or default.

Proposed PDA addition re: “Development Equity and Fair Housing Monitoring”

xx. Ongoing Monitoring Obligations. At the conclusion of Phase 1, and each subsequent Phase, the Proponent shall, in partnership with the Boston Redevelopment Authority and Office of Fair Housing and Equity, prepare a report (hereinafter referred to as a "Development Equity Report") describing its ongoing compliance with the requirements of this Master Plan and any subsequent agreed-upon community benefits agreements pertaining to the Master Project and/or PDA Area. The Proponent shall provide copies of each Development Equity Report to the BPDA, the Boston City Council, the Office of Housing Stability, the Office of Fair Housing and Equity, and the Mayor's Office of Workforce Development. The BPDA and the Proponent shall hold a public hearing to discuss each Development Equity Report and consider whether to modify the requirements of this Master Plan and/or the next Phase in order to better promote the Housing, Public Benefits, and Transportation goals of the Master Project. Compliance with the review process outlined in this Paragraph (as well as making any modifications to the Master Plan and/or Phase documents recommended by the BPDA and/or City of Boston in the course of its review) shall be a precondition for the commencement of Phase 2 and each subsequent Phase of the Master Project--that is, no building permit shall issue with respect to any construction located within the area of any subsequent Phase until the public review of the Development Equity Report for prior Phase is complete. The requirements of this Paragraph shall also apply to any of the Proponent's successors-in-interest, should the Proponent sell or transfer all or part of the PDA Area during the pendency of construction.

Proposed Fair Housing Zoning Amendment
Offered by COUNCILOR LYDIA EDWARDS



**CITY OF BOSTON
IN CITY COUNCIL**

**ORDER REGARDING A TEXT AMENDMENT FOR
BOSTON ZONING CODE RELATIVE TO FAIR HOUSING AND
INTEGRATED COMMUNITIES**

- WHEREAS,* On April 11, 1968, President Lyndon Johnson signed the Civil Rights Act of 1968, including Title VIII of said legislation, the Fair Housing Act; and,
- WHEREAS,* The Fair Housing Act outlawed discrimination in sale, rental, and financing of housing; and,
- WHEREAS,* Beginning in 1968, federal, state and municipal jurisdictions have recognized the obligation to proactively address, or, as defined in 24 CFR 5.152, affirmatively further, fair housing through meaningful actions that overcome patterns of segregation and foster inclusive communities; and,
- WHEREAS,* The City of Boston has committed to the elimination of discrimination, within Chapters 10-3 and 12-9 of the Boston Municipal Code and elsewhere through policy and executive action, and has conducted listening sessions relative to fair housing; and,
- WHEREAS,* The city's zoning code and development review procedures lack affirmative measures to further fair housing; *NOW, THEREFORE BE IT*
- ORDERED,* That the Boston City Council by and through Councilor Lydia Edwards submits a petition to amend the text of the Boston Zoning Code, as established under Chapter 665 of the Acts of 1956, as amended, to establish fair housing regulations in Boston's zoning code and procedures to secure integrated communities.

Filed in Boston City Council: April 10, 2019

Text Amendment Application No. _____
Boston City Council

Article 2 and Article 2A inserting terminology related to fair housing and displacement; Article 80, Sections 1, A-5, B-7, C-4, C-5 and C-7, modifying development review to require consistency with fair housing plans; and Article 53, Section 49, amending the public benefit obligations for Planned Development Areas in East Boston.

TO THE ZONING COMMISSION OF THE CITY OF BOSTON:

Boston City Council through and by *Boston City Councilor Lydia Edwards* petitions to amend the text of the Boston Zoning Code, as established under Chapter 665 of the Acts of 1956, as amended, as follows:

1. By amending **Articles 2 (Definitions)** and **2A (Definitions applicable in neighborhood districts and in Article 80, Development Review and Approval)** by adding the following term and definition:

Affirmatively Furthering Fair Housing. As defined in 24 CFR 5.152: Taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws. “Civil rights and fair housing laws” shall include but not be limited to Title VIII of the Civil Rights Act of 1968, 42 U.S.C. 3608, Chapter 151B of the Massachusetts General Laws, and Chapters 10-3 and 12-9 of the Boston Municipal Code.

Analysis of Impediments. A review of potential actions, omissions, conditions or decisions that have the effect of restricting housing choices or the availability of housing choices on the basis of age, color, creed, disability, gender identity, marital status, familial status, national origin, race, religion, sex, sexual orientation, presence or absence of dependents, or public assistance source of income, or other protected classes listed under Chapter 151B of the Massachusetts General Laws; policies, practices, or procedures that appear neutral on their face, but which operate to deny or adversely affect the availability of housing to protected classes; and accompanying corrective actions designed to overcome such impediments.

Exclusionary displacement. Unwilling departure, removal or economic dislocation, in a district or in an adjacent and impacted district, occurring when neighborhood choices become limited due to increasing rent burden or a lack of housing that is affordable to area residents, area renters, low-income residents, or residents belonging to protected class or a set of protected classes, thereby restricting housing choice for the impacted population.

Meaningful Actions. A fair housing standard defined in 24 CFR 5.152 and case law indicating significant actions that are designed and can be reasonably expected to achieve a material positive change that affirmatively furthers fair housing by, for example, increasing fair housing choice or decreasing disparities in access to opportunity.

2. By amending **Article 80 (Development Review and Approval)**, as follows:
 - a. In Section 80-1, Statement of Purpose and General Provisions:
 - i. Insert in the second paragraph, following the text “To that end, the goals of these development review requirements include the following:”, the phrase:

to take meaningful actions that promote racially, ethnically and economically integrated communities and secure the city's obligations towards affirmatively furthering fair housing;

b. In Section 80-A-5, Agreements:

i. Insert after the second paragraph, the new paragraph:

The cooperation agreement shall also include, or shall require the Applicant and the Boston Redevelopment Authority to execute a separate agreement, with the Department of Neighborhood Development and the Office of Fair Housing and Equity, or such Department or Offices assuming their responsibilities, regarding compliance with fair housing laws and affirmatively furthering fair housing provisions, which shall address affirmative marketing, the participation of protected classes, the prevention of exclusionary displacement, and strategies for promoting racially, ethnically and economically integrated communities and, including but not limited to strategies to address affordability, prevention of displacement, and integrations of communities facing language isolation or access barriers. In the case of a PDA Development Plan or PDA Master Plan the agreement shall also include measures for assessing compliance and amending strategies, interventions or public benefit requirements should the initial implementation of such a Plan fail to further fair housing, including, for a multi-phase development, a mandatory review not less than once per phase.

c. In Section 80-B-3, Scope of Large Project Review; Content of Reports:

i. Delete the text:

(7) tidelands; and

(8) Development Impact Project, as set forth in this Section 80B-3.

ii. and insert in its place:

(7) tidelands;

(8) Development Impact Project, as set forth in this Section 80B-3; and

(9) Fair Housing, as set forth in this Section 80B-3.

d. And in Section 80-B-3, Scope of Large Project Review; Content of Reports:

i. Insert, at the end of the section and after the enumerated item entitled "8. Development Impact Project Component" the following text:

9. Fair Housing. In its Scoping Determination, the Boston Redevelopment Authority shall, in conjunction with city agencies, assess the positive and negative impacts of a Project, including proposed public benefit, on (1) the city's efforts toward Affirmatively Furthering Fair Housing, with particular regard to concerns identified in an Analysis of Impediments and (2) addressing impediments to fair housing, including both those identified citywide and in the neighborhood or district in which the project is proposed.

e. In Section 80-C-4, Standards for Planned Development Area Review Approval:

i. Delete the text:

and (e)

ii. and insert in its place the following:

(e) such plan complies with, facilitates, and advances the City of Boston's obligations, responsibilities, goals and programs regarding affirmatively furthering fair housing, specifically ensuring integrated communities and averting racial, ethnic or economic segregation or the displacement of protected classes, with particular regard to concerns identified in an Analysis of Impediments, and with regard for impacts that may trigger exclusionary displacement; and (f)

f. In Section 80-C-5, Boston Redevelopment Authority Procedures for Planned Development Area Review:

i. Delete the following text:

4. Boston Redevelopment Authority Review and Approval. No later than sixty (60) days after the Boston Redevelopment Authority has received the PDA Development Plan or PDA Master Plan filed pursuant to subsection 2 of this Section 80C-5, the Boston Redevelopment Authority shall approve the plan submitted for review and authorize its Director to petition the Zoning Commission to approve the plan and designate the area of the Proposed Project or Master Plan development concept as a Planned Development Area, or shall conditionally approve the plan, or shall disapprove the plan. Before it issues its decision, the Boston Redevelopment Authority shall hold a public hearing, for which it shall publish notice pursuant to Section 80A-2, and shall consider the public comments received.

ii. and insert in its place the following text:

4. Boston Redevelopment Authority Review and Approval. No sooner than sixty (60) days after the Boston Redevelopment Authority has received the PDA Development Plan or PDA Master Plan filed pursuant to subsection 2 of this Section 80C-5, the Boston Redevelopment Authority shall consider approval of the plan submitted for review and authorize its Director to petition the Zoning Commission to approve the plan and designate the area of the Proposed Project or Master Plan development concept as a Planned Development Area, or shall conditionally approve the plan, or shall disapprove the plan. Before it issues its decision, the Boston Redevelopment Authority shall (1) hold a public hearing, for which it shall publish notice pursuant to Section 80A-2, (2) allow for written and electronic comment and issue written responses, individually or in the

aggregate, to comments received no later than three business days before the date of a public hearing and (3) consider all public comments received. Prior to approval of a plan, the Boston Redevelopment Authority shall also produce a Certification of Fair Housing from the City of Boston's Department of Neighborhood Development and the Office of Fair Housing and Equity, or their successor agencies, indicating that the PDA Development Plan or PDA Master Plan complies with, facilitates, and advances the City of Boston's obligations, responsibilities, goals and programs regarding affirmatively furthering fair housing.

- g. In Section 80-C-7, Amendment of Planned Development Area Plans:
 - i. Insert, after the text "approval of such plan", the following text:

, provided that the Boston Redevelopment Authority shall, upon receipt of a proposed amendment of a Planned Development Area, assess compliance with the city's obligations regarding Affirmatively Furthering Fair Housing and offer further amendment as necessary to further fair housing, and provided further that the public benefits associated with the Planned Development Area and such amendment shall be subject to public benefits required within a pertinent Neighborhood District or overlay district.

3. In Article 53, East Boston Neighborhood District,

- a. In Section 53-49, Planned Development Areas: Public Benefits:

- i. Delete the text:

The Boston Redevelopment Authority may approve a Development Plan for a Proposed Project as meeting the requirement of Section 80C-4 (Standards for Planned Development Area Review) for compliance with the applicable planning and development criteria of this Article if the Development Plan proposes a plan for public benefits, including one or more of the following: (a) diversification and expansion of Boston's economy and job opportunities through economic activity, such as private investment in manufacturing, commercial uses, or research and development; or (b) creation of new job opportunities and establishment of educational facilities, career counseling, or technical assistance providing instruction or technical assistance in fields related to such jobs; or (c) provision of Affordable Housing available to East Boston and Boston residents; or (d) improvements to the aesthetic character of the development site and its surroundings, which may include the provision of open space connections to the waterfront, the provision of street trees and other improvements that enhance open space, the improvement of the urban design characteristics of the site and its surroundings, or the enhancement of existing open space or the creation of new open space.

- ii. and insert in its place the following text:

The Boston Redevelopment Authority may approve a Development Plan for a

Proposed Project as meeting the requirement of Section 80C-4 (Standards for Planned Development Area Review) for compliance with the applicable planning and development criteria of this Article if the Development Plan proposes a plan for public benefits, including two or more of the following: (a) creation of new job opportunities and jobs training pipelines for low- and moderate-income residents and establishment of educational facilities, English as a Second Language programming, career counseling, or technical assistance providing instruction or technical assistance in fields related to such jobs; or (b) provision of Affordable Housing available to East Boston and Boston residents, including protected classes, based on an analysis of the median incomes of renters and homeowners in East Boston and Boston; or (c) the provision, financing or facilitation of affordable childcare services for Boston residents, provided that such benefit should maximize opportunities for local employment; or (d) improvements to the aesthetic character of the development site and its surroundings, which may include the provision of open space connections to the waterfront, the provision of street trees and other improvements that enhance open space, the improvement of the urban design characteristics of the site and its surroundings, or the enhancement of existing open space or the creation of new open space.

Petitioner _____

Address: One City Hall Square -- Fifth Floor

Telephone: 617-635-3200

Date: _____

Suffolk Downs - Initial Set of Questions

Housing

1. Please clarify the estimated *units* of housing produced in each phase, beginning with Phase One.

The Boston portion of the Suffolk Downs site is expected to be developed in five phases over the course of approximately 15-20 years. Because of the site's size and because its development will not require the displacement of any existing residents (i.e. the site currently includes no residential uses), the Suffolk Downs redevelopment presents a unique opportunity to create a substantial number of new housing units and expand Boston's housing supply. The currently anticipated number of new units in each of the phases, which is subject to change based on market and other factors, is set forth below.

Boston – Anticipated New Units of Housing by Phase	
Phase 1B	700
Phase 2B	1,300
Phase 3B	2,000
Phase 4B	2,000
Phase 5B	1,200
Total	7,200

2. Please clarify the estimated units of housing, per building type (e.g. townhomes, apartment building, mixed-use, single family home) – list bldg. #'s that are retail.

The new housing to be developed at Suffolk Downs will include a variety of unit types, including single family homes, town homes, multi-family residential uses and senior housing, with a mix of unit types, including micro units, studios, one, two and three-bedroom units. The currently-anticipated unit mix, which is subject to change based on market and other factors, is set forth below.

Boston – Anticipated Number of Units by Housing Type/Category	
Multi-family	
Senior Housing	691
Apartments	4,667
Condominiums	1,842
Multi-family Total	7,200
Townhomes	11
Single Family	12

Boston - Anticipated Unit Mix	
Unit Type	# of Units
Senior Housing	
Studio	56
One Bedroom	318
Two Bedroom	258
Three Bedroom	47
Total Senior Housing	691
Apartments	
Micro Units	206
Studio	1,006
One Bedroom	2,348
Two Bedroom	857
Three Bedroom	228
Total Apartments	4,667
Condominiums	
Studio	119
One Bedroom	904
Two Bedroom	663
Three Bedroom	144
Total Condos	1,842
Total Townhomes	11
Total Single Family	12
Total Boston	7,223

It is expected that the residential buildings designated as B-16, B-18, B-20, B-30, B-37, B-38, B-40, B-41 will include ground floor retail uses. It is not anticipated that residential and office uses will be located in the same buildings on the site at this time.

Housing / Inclusionary Development:

3. Please identify the number of inclusionary development units estimated per phase.

Currently, the anticipated approximate number of inclusionary development units in each of the phases is set forth below.

Boston – Anticipated Number of Housing Units by Phase		Anticipated IDP Units (13%)
Phase - 1B	700	91
Phase - 2B	1,300	170
Phase - 3B	2,000	260
Phase - 4B	2,000	260
Phase - 5B	1,200	156
Total	7,200	937

4: Beginning with Phase I, please clarify if the project proponent intends to meet inclusionary development policy (IDP) goals with on-site, off-site or payout, a combination of all three, or if this has not been determined.

The project proponent has committed to providing all required IDP units on site, but is also open to discussion with the City of Boston about the possibility of IDP contributions in lieu of on-site compliance to facilitate the creation of housing opportunities in other portions of East Boston more quickly, noting that this type arrangement would be subject to agreement with the City of Boston. The proponent is also willing to support efforts by local residents to encourage the City of Boston to use linkage payments made toward the Development Impact Project Housing Contribution, generated by commercial development at Suffolk Downs, toward creating housing opportunities in East Boston, but again, this is also subject to the City of Boston's discretion.

5. If meeting IDP goals with off-site compliance, does the proponent intend to direct off-site units to East Boston?

As noted above, the project proponent has committed to providing all IDP units on site but is open to discussing alternative approaches. If the City determines that the proponent shall meet IDP requirements other than through on-site compliance, the proponent is open to discussing details with various stakeholders to ensure an appropriate and effective distribution of resources. The proponent is also willing to support the use IDP monetary contributions and funds from Development Impact Project Housing Contributions in East Boston projects, but this is subject to the City of Boston's discretion.

6. What is the estimated Residential Gross Floor Area per IDP unit? As necessary, please clarify distinctions per building model or type.

The on-site affordable units to be developed pursuant to the City's IDP are expected to have gross floor areas equivalent to the gross floor areas for on-site market-rate units. Please note that all unit sizes (market and affordable) will be determined in light of market conditions and are subject to change. If unit sizes change, market and IDP units will generally change equally, such that market and IDP units will continue to have equivalent sizes. The current anticipated average unit sizes are shown in the matrix below:

Boston - Residential Unit Type	Anticipated Average Unit SF
Senior Housing	
Studio	500
One Bedroom	720
Two Bedroom	1,000
Three Bedroom	1,200
Apartments	
Micro Units	325
Studio	500
One Bedroom	715
Two Bedroom	980
Three Bedroom	1,175
Condominiums	
Studio	605
One Bedroom	800
Two Bedroom	1,200
Three Bedroom	1,500
Townhomes	1,600
Single Family Homes	2,100

7. What is the estimated cost per IDP unit? What is the anticipated incremental cost of adding an inclusionary development unit on site? What is the anticipated incremental cost of adding an inclusionary development unit off-site?

The proponent is currently at the Master Planning stage for the Suffolk Downs development, designing and preparing the Suffolk Downs site to include a wide range of building and unit types that are expected to be constructed during five phases over approximately 15-20 years. Based on the proposed residential program, which includes rental and home ownership units (of which 10% will be designated as senior housing), the proponent estimates that the average cost for all Suffolk Downs housing units is approximately \$500,000 per unit. Market rate and IDP units will be of similar sizes, distributed equally throughout the project (e.g., in various building types), include equivalent finishes, and be built over time along with the market rate units. It is expected that the average cost of off-site IDP units would be approximately 10% to 15% less than this figure, assuming similar building scale and construction methodology, as unlike the units at Suffolk Downs, these off-site units would likely not be burdened by the extensive infrastructure work that the proponent must complete at Suffolk Downs (construction of all publicly accessible roads, service drives, sidewalks, bike paths, open space, utility infrastructure, etc.) in order to appropriately develop the site. There may also be differences based upon construction type such as wood frame construction versus steel frame construction, but otherwise there likely would not be material differences in construction costs. The proponent notes that funds paid pursuant to the City of Boston's IDP policy could potentially create more affordable units than the use of the same funds to pay for construction of IDP units on-site if the funds are used to pay for the acquisition of existing housing stock in East Boston (versus new construction off-site) or to provide funds toward larger affordable housing projects.

8. Please estimate the share of IDP units by affordability level, e.g. one-half of units at 70% AMI, 50% AMI, etc.

Suffolk Downs is in Zone C per the City of Boston's Inclusionary Development Policy ("IDP"). The IDP requires that rental units be income restricted to households earning less than 70% of AMI. The IDP requires no less than 50% of the on-site affordable home-ownership units be made available to households earning more than 80% of AMI, and no more than 50% of the total affordable units be made available to households earning between 80% of AMI and 100% of AMI. The proponent will comply with the Mayor's IDP.

9. Please clarify breakdown of IDP rental vs. homeownership units.

The City of Boston's 13% IDP requirement will be equally applied to various housing types, including senior housing, apartments, condominiums, townhomes and single-family houses. The current anticipated breakdown of IDP units by various types of residential units is set forth below.

Boston - Anticipated Types of Residential Units	Anticipated Total Number of Units	Anticipated IDP Units (13% IDP)
Multifamily		
Senior Housing	691	90
Apartments	4,667	607
Condominiums	1,842	239
Multifamily Total	7,200	936
Townhomes	11	1
Single Family	12	2

Housing / Senior Housing

10. Page 9 of the PDA submission indicates at least 10% of residential space, including accessory units, will be senior housing, and that 13% of senior housing units will be IDP/affordable units. Please clarify the number of units that will be senior housing units. Please clarify the proposed level of affordability for senior housing units built in compliance with the IDP.

The following is the currently anticipated breakdown of senior housing units:

Boston - Senior Housing – Anticipated Unit Breakdown		
Residential Unit Type	Anticipated Total Units	Anticipated Affordable Units
Studio	59	8
One Bedroom	321	42
Two Bedroom	261	34
Three Bedroom	50	6
Total Senior Housing	691	90

11. Please clarify the number of senior units proposed in each phase of construction, beginning with Phase One.

The PDA documents include a commitment to have no less than 10% of the housing be senior housing. The specific timing/phasing of senior units has not yet been determined. This will be determined based upon market conditions as the site is built out.

Public Benefit / Phase I

12. Please provide and submit into the record, a description of the mitigation that will be provided with respect to each building in in Phase I, in accordance with the mitigation schedule in Exhibit F.

Portions of the mitigation for the Phase 1 development project in Boston as outlined in the PDA documents ("Phase 1") specifically apply to each building in Phase 1, and other portions are not tied to a specific building but are tied to the overall phase itself. Please see below for additional detail on the Phase 1 mitigation elements.

Per Building Specific Mitigation:

- Compliance with Boston's IDP policy (13% of units in each residential building)
- Development Impact Project (Linkage) Housing and Jobs Exaction Payments
 - Applies to all "Development Impact Project Uses" (these are commercial and retail components)
 - Anticipated Development Impact Project (Linkage) Fees:
 - Housing Contributions: \$9.03 per SF
 - Jobs Contributions: \$1.78 per SF
 - Total: \$10.81 per SF after the first 100,000 SF
 - Total Phase 1B Commercial SF =
 - 523,179 (office/lab) + 70,202 (retail) – 100,000 credit = 493,381SF
 - Phase 1B Linkage Fees Calculation =
 - \$10.81*493,381 SF = \$5,333,449 in Phase 1B Linkage Fees
- All Phase 1 Townhouses will be Passive House and/or Energy Positive equivalent
- The proponent has committed to delivering a LEED-CSv4 Gold level certifiable office building, and this building will be part of the Phase 1 development.
- The Site will comply with the LEED targets identified below. (Please note that each building's LEED checklist will be submitted during Design Review.)
 - Minimum of 5% LEED Platinum
 - Minimum of 75% LEED Gold
 - Maximum of 20% LEED Silver
- Phase I will comply with the following LEED targets. Each building's LEED checklist will be submitted during Design Review. Buildings will achieve ratings of:
 - Minimum of 50% LEED Gold
 - Remaining balance will achieve 25% LEED Silver or higher
- Implement Comprehensive Transportation Demand Management ("TDM") Program

Additional Phase 1 Mitigation Commitments

- Publicly accessible open space:
 - The publicly accessible open space developed as part of Phase 1 will consist of 25% of the total area of the Phase 1 site, or approximately 250,000 SF (approximately 5.75 acres).
 - Belle Isle Square, which will contain an approximately one-acre public plaza that can be used for community events (public performances, farmer's markets, etc.), will be built concurrently with the Phase 1 buildings surrounding it. These buildings are anticipated to be the first buildings constructed on the Boston portion of the site.
 - A portion of the Central Common publicly accessible open space, which is anticipated to be approximately 198,100 SF (or approximately 4.5 acres) and will include the horseshoe pond and the area surrounding the pond, will be developed concurrent with the other Phase 1 buildings.
 - The balance of the publicly accessible open space that is being developed as part of Phase 1 will be created as the phase is built out.
- Roadway Network:
 - Detailed construction phasing of the roadways has not yet been fully determined but it is expected that the majority of the roadway system within Phase 1 will be built prior to the completion of the first buildings included in the phase
 - Smaller roadway segments that serve specific buildings in the phase will be constructed concurrently with those buildings
 - A publicly accessible pedestrian connection between the Suffolk Downs MBTA station and the Suffolk Downs site will be developed as part of Phase 1
 - A new community path within the Phase 1 site will be developed as part of Phase 1
 - First segment of a landscaped wetland buffer along the eastern boundary of the Project Site will also be developed as part of Phase 1
- Bicycle & Pedestrian Network:
 - Similar to the roadway network the majority of the Phase 1 bicycle and pedestrian network will be built prior to the completion of the first buildings in this phase.
 - Inclusion of a public bike share station in close proximity to the planned plaza at Belle Isle Square
 - Completion of a feasibility study for an extension of the East Boston Greenway from Constitution Beach to Revere Beach
- Community Space:
 - A new 2,500 square foot community space will be provided within one of the first buildings to be constructed in Phase 1. It is anticipated that the community space within Phase 1 will be at an interim location until a permanent location is established in a later phase of the Suffolk Downs project.
- 10% Retail Allocation to Local Businesses:
 - Phase 1 is expected to include a total of approximately 70,200 SF of ground floor retail uses, of which 10%, or approximately 7,000 SF, will be leased to local businesses with flexible lease parameters.
 - Specific locations for the 10% local business uses will be determined during build-out of Phase 1; this space will be provided throughout Phase 1 so that approximately 10% of retail space that is constructed from time to time will be made available to local business (e.g. If 50,000 SF of retail is delivered with initial Phase 1 buildings constructed, approximately 5,000 SF will be allocated to local businesses).

Public Benefit / Tax Revenue

13. Please provide a rough estimate tax revenue to the City of Boston for Phase I buildings, as proposed. Please provide a rough estimate of tax revenue to the City of Boston for all buildings, assuming project completion as proposed.

The matrix below outlines an estimate of anticipated property taxes based on the RKG Report, which is based on the initially proposed development plan that accommodated Amazon HQ2. An updated property tax analysis based on the current development program is being prepared.

Boston – Gross Property Tax by Phase	
Phase – 1B	\$9,256,285
Phase – 2B	\$13,581,603
Phase – 3B	\$26,176,296
Phase – 4B	\$27,189,378
Phase – 5B	\$6,555,639
Total	\$81,759,201

Public Benefit / Infrastructure Expenditures

14. The proponent identifies \$170 million in public infrastructure and open space investments on Page 11 and elsewhere in the PDA filing, including Exhibit J.

Please clarify Exhibit J and other description of public investment by identifying, valuing and itemizing:

- **The infrastructure and open space investments at Suffolk Downs**
- **Other investments in East Boston, if any**
- **Proposed regular maintenance of infrastructure or open space which would otherwise be borne by City of Boston, and estimated annual cost**
- **Infrastructure investments elsewhere in Boston**
- **Investments not in the City of Boston**
- **Proposed investment to expand the inbound capacity of Route 1A**

The proponent now expects that the Suffolk Downs project will require investment of approximately \$270 million, of which approximately \$165 million will be invested in Boston, including public roadways, sidewalks, bicycle paths and pedestrian paths, water, sewer and storm drainage facilities, and open space areas. All of this work will be the responsibility of the proponent, at no cost to the City of Boston or City of Revere. In addition, the proponent will invest over \$50 million of off-site traffic mitigation to improve key intersections in close proximity to Suffolk Downs. In total, the proponent is committing more than \$320 million towards this work. Further details regarding these planned investments is set forth below.

On-Site Investments in Boston will include the following key costs*:

- **Publicly Accessible Roadways and Utility Infrastructure: \$47,000,000**
 - **Includes: water/sewer infrastructure and drainage facilities**
- **Sidewalks, Curbing, Pedestrian Paths, Bike Paths: \$30,800,000**

- Open space areas: \$48,000,000
- Resiliency measures in Boston (on and off-site): \$6,600,000
 - Includes: Tide Gates and Pump Station Upgrades
- Site Preparation and Demolition: \$23,000,000
- Miscellaneous: \$10,000,000

**All cost estimates are approximate*

Other Investments in East Boston (in addition to the \$270 million in on-site infrastructure investments) will include*:

- Development Impact Project (Linkage) Housing and Jobs Exaction Payments in Phase 1 totaling approximately \$5,333,448
- Inflow/Infiltration (“I/I”) Fees of \$9.64 per new gallon added from all buildings in Phase 1. These I/I Fees, which total approximately \$1,900,000 in Phase 1, will be contributed to the City to make improvements to the BWSC system that Suffolk Downs.
- Building Permit Fees in Phase 1: approximately \$3,400,000
- Inspection Fees in Phase 1: approximately \$450,000
- Surrounding Street and Roadway Improvements:
 - Route 1A at Tomasello Drive (Median Island Improvements): \$200,000 (*Prior to completion of Phase 1 Revere*)
 - Route 1A at Tomasello Drive (Temporary Southbound Left Turn Signal) \$130,000 (*at 2,000,000 sf*)
 - Route 1A from Boardman Street to Furlong Drive (Super Street): \$23,880,000 (*at 3,000,000 sf*)
 - Route 1A at Curtis Street: \$1,000,000 (*at 3,000,000 sf*)
 - Bennington at Saratoga: \$930,000 (*at 5,500,000 sf*)
 - Day Square (Five Intersections): \$1,000,000 (*at 5,500,000 sf*)
- Other Transit and Road Improvements (Cost TBD)

**All cost estimates are approximate*

Regular Maintenance of Open Space:

It is difficult to accurately estimate the cost of maintaining the new publicly accessible open space and new roadway network to be constructed at Suffolk Downs, which the Proponent will be maintaining, given that design plans are not yet far enough advanced to include the details needed to generate such estimates. However, upon completion of the Phase 1 roadway and open space improvements, the proponent will create a Building Owner’s Association comprised of each Phase 1 parcel owner. These parcel owners will be responsible for the ongoing annual maintenance costs on a proportionate basis. Over the coming months the Proponent will work to estimate the annual costs for both roadway maintenance and open space maintenance. (At completion of Phase 1, the proponent estimates that annual maintenance costs for Phase 1 open space areas will be approximately \$400,000 to \$600,000.)

Regional Off-Site Mitigation (in Boston and Revere)

- The total Estimated Cost for Route 1A Improvements is approximately \$29 million (spread across the Route 1A corridor in both Boston and Revere). The Proponent estimates that approximately 85% of these improvements are located in Boston (+/- \$25 million).
- The proponent has committed to completing a feasibility study of a potential introduction of barrier system or berm to protect the Suffolk Downs site and surrounding neighborhoods from flooding and sea level rise.

15. Please expand on any regarding the possible inclusion of a municipal building such as a school or fire station at the site (in addition to the 2,500 sf of ground floor community/civic space currently identified for temporary location in Belle Isle Square during Phase 1B).

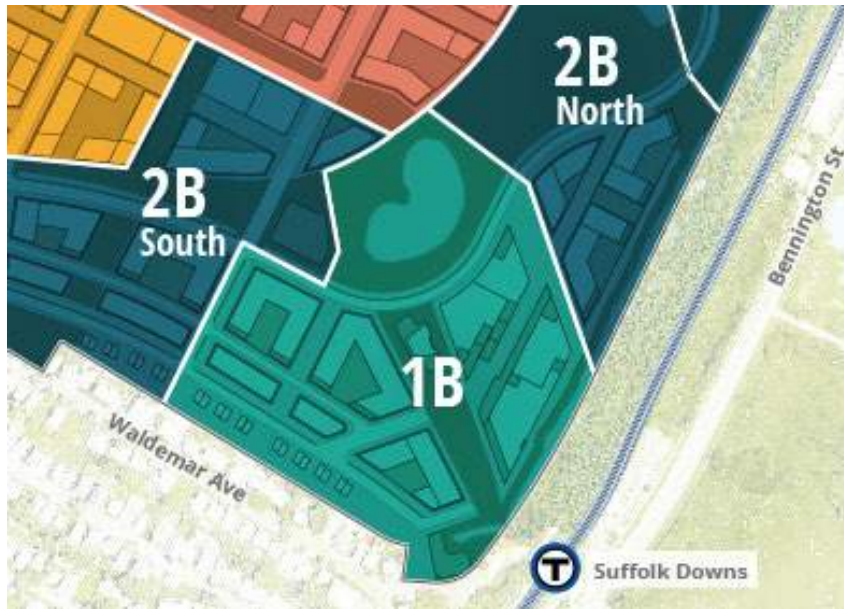
As discussed, the proponent expects that the Suffolk Downs project will include investment of more than \$270 million, across the entire Suffolk Downs site, in public roadways, sidewalks, bicycle paths and pedestrian paths, water, sewer and storm drainage facilities, and open space areas to create robust public infrastructure for the project at no cost to the City of Boston. With respect to on-site civic space, the proponent is committed to constructing and maintaining a new publicly accessible 40-acre open space network that will incorporate extensive active and passive recreation areas. This includes the provision of 27 acres (25% of the Boston portion of the site) of cohesive and interconnected publicly accessible outdoor civic/open space in Boston, together with an additional 13 acres of publicly accessible open space in Revere (25% of the Revere portion of the Suffolk Downs Site), all of which will be available to Boston residents.

The site's open space network is proposed to include outdoor performance venues and will have convenient access to retail areas along new, wide, walkable boulevards. The proponent has not proposed and is not planning for the inclusion of a school or fire station at the site. Such facilities are currently being provided in other locations in East Boston that are more centrally located, easier to access and better serve the larger East Boston community in their current locations.

Public Benefit / Open Space

16. Exhibit J shows the Central Common as being part of Phases 2B and 2R, while Exhibit H shows it as part of Phase 1B. Please clarify which phase of the project the Central Common will be a part of and what (if any) open space will be included in Phase 1B besides Belle Isle Square.

Due to the size of the 15-acre Central Common, 198,100 SF or approximately a 4.5 acre portion of this large new open space, including the portion containing Horseshoe Pond, will be built in Phase 1B. the remaining portions of the Central Common will be completed in Phase 2B and 2R (the second phase of development within Revere).



17. Please consider the addition a designated soccer area (fields with goals) to both Exhibit F and Page 3, Section 5, Subsection C.

At this time, the proponent's plans respecting the Central Common include development of a multi-purpose field that can be used as a regulation soccer field (approximately 195' x 330') but may also be used for other activities including a Little League Baseball Field (60'x200'). The same space can also fit an event lawn for 350 people (250'x100') and smaller activities like youth soccer or other lawn recreational activities (frisbee, spike ball, etc.). The Common will also have casual play spots and family parks. In winter, there can be ice skating on the horseshoe pond and snow sculpting in the open field.

The Central Common will be open to the public and the proponent will, working with local government officials and community and neighborhood groups, manage the programming and use of the Central Common to incorporate various types of uses throughout the year.

Sustainability / Building Emissions

18. Building emissions are the greatest source of pollution in the City of Boston. In the DEIR/DPIR filing, the project proponent identified building emissions of roughly 72,554 - 90,230 tons. The MA Department of Public Utilities has since approved an energy efficiency plan indicating some support for Passive House construction/design. The PDA filing also implies a greater commitment toward Passive House Development / Energy Positive buildings but does not detail building emissions. Please clarify if the overall proposed energy usage / building emissions have changed since the DEIR/DPIR filing. Please describe how passive house development does or does not account for any change.

Since the filing of the DEIR/DPR on October 1, 2018, as a result of ongoing discussions with MEPA, DOER, and BPDA, the Proponent refined the proposed stationary source GHG emissions mitigation approach to better support GHG emissions reductions goals. The specific changes to the energy savings targets presented below represent one element of the proposed suite of GHG mitigation measures developed in late-November 2018.

All buildings will improve energy savings over current code:

- 5% of buildings achieve over 50% energy savings
- 35% of buildings achieve 30% to 50% energy savings
- 55% of buildings achieve 18% to 30% energy savings
- 5% of buildings achieve 10% to 18% energy savings

As presented in Table 7-18 of the DEIR/DPIR, the Project (without parking) demonstrated a 19.4% energy use savings and 17.5% GHG emissions reduction compared to the Base Case.

Applying the energy savings targets above to the Program A (Pro-Office) development program studied in the DEIR/DPIR, low- and high-end emissions reductions scenarios were calculated (as requested by DOER).¹ This is summarized in the table below:

Program A - Pro-Commercial	Total Energy Consumption			CO2 Emissions		
	Electricity (MMBtu/yr)	Natural Gas (MMBtu/yr)	Total (MMBtu/yr)	Electricity (tons/yr)	Natural Gas (tons/yr)	Total (tons/yr)
DPIR/DEIR Base line Scenario	505,616	566,468	1,072,084	52,592	33,167	85,758
DPIR/DEIR Proposed Scenario	442,920	421,462	864,382	46,070	24,677	70,747
			207,702			15,011
			19.4%			17.5%
Low-end Scenario	356,661	419,551	776,212	37,107	24,586	61,693
End use savings	102,385	125,012	227,398	10,652	7,326	17,978
Percent savings			22.7%			22.6%
High-end Scenario	294,964	342,245	637,209	30,688	20,056	50,744
End use savings	164,082	202,318	366,401	17,071	11,856	28,927
Percent savings			36.5%			36.3%

The commitments made in November 2018 increase energy reduction by 3.3 to 22.7% and GHG emissions by 5.1 to 22.6%. The analysis also includes one (1) passive house mid-rise residential building in Phase 1B that is assumed to be all-electric and results in a 60% reduction in energy from the baseline. While this is a considerable reduction for one building, it has a small contribution to the overall masterplan performance.

Similar analysis has been conducted to reflect the Program B (Pro-Residential) development program. Under Program B, the commitments made in November 2018 result in energy reduction of 28.7%, an increase of 6% compared to Program A and GHG emissions reduction of 28.5%, an increase of 6% compared to Program A, lowering emissions from the 72,554 tons per year modelled in the DEIR/DPIR, to approximately 63,014 tons per year.

¹ The low-end scenario assumes building design that exceeds the current Stretch Energy Code requirements and align with the Design Case model assumptions as presented in Section 7.3.2 of Chapter 7, Greenhouse Gas Emissions Assessment, of the DEIR/DPIR for each building typology. The high-end scenario assumes a greater energy efficiency/GHG emissions reduction with the assumption of more stringent energy code requirements in the future as the project is build-out over 15 to 20 years.

PROGRAM B - Pro-Residential	Total Energy Consumption			CO2 Emissions		
	Electricity (MMBtu/yr)	Natural Gas (MMBtu/yr)	Total (MMBtu/yr)	Electricity (tons/yr)	Natural Gas (tons/yr)	Total (tons/yr)
Baseline Scenario	408,194	590,313	998,507	42,468	34,592	77,061
Proposed Scenario	353,230	448,199	801,429	36,750	26,264	63,014
End Use savings			197,078			14,046
Percent savings			24.6%			22.3%
Low-end Scenario	294,833	417,055	711,888	30,674	24,439	55,114
End use savings	113,360	173,258	286,619	11,794	10,153	21,947
Percent savings			28.7%			28.5%
High-end Scenario	242,585	339,946	582,531	25,238	19,921	45,159
End use savings	165,609	250,368	415,976	17,230	14,672	31,901
Percent savings			41.7%			41.4%

Similarly, the analysis also includes one (1) passive house mid-rise residential building in Phase 1B that is assumed to be all-electric and results in a 60% reduction in energy from the baseline. While this is a considerable reduction for one building, a 50,000 SF building would result in a reduction of only 103 tons per year in the overall master plan's annual emissions.

As part of the November 2018 updated commitment, the proponent has also committed to installing at least 2MW of rooftop solar photovoltaic systems. These systems are estimated to produce 2,300 MWh of carbon-free electricity annually, further reducing GHG emissions by 813 tons per year (per today's emissions factor) when fully operational.

20. Please clarify sustainability measures proposed for larger buildings or commercial spaces.

DEIR/DPIR Chapter 4, *Sustainability/Green Building*, describes the overall approach to sustainable design, construction, and operation for the Project. Given its scale, redevelopment of the Project Site presents a unique opportunity to incorporate sustainable design and climate change resiliency elements in a comprehensive manner from the early planning stages. Sustainability is a key theme for the Project as it proposes to redevelop an underutilized urban site, use land efficiently by increasing density in a mixed-use TOD and include facilities/systems internal to the Project Site that aim to discourage single-occupancy vehicles and promote low carbon modes of transportation. In summary, the sustainable design measures proposed in the DEIR/DPIR included:

- Exceed requirements necessary to comply with Article 37 of the Boston Code, including design of buildings to meet LEEDv4 under the applicable green building rating system for the given building typology. The future buildings in Revere will be designed to the same LEED Standards as buildings in Boston.
- Design 75% of the buildings to satisfy requirements for a minimum LEED Gold level, 5% of the buildings to satisfy requirements for a LEED Platinum level, and the remaining buildings will satisfy requirements for a minimum LEED Silver level.
- Design all buildings to be solar ready, including: (1) the roof structure will be capable of supporting such a system; (2) a pathway for conduit routing is identified; and (3) space in the main switchgear will be provided for a future PV breaker.
- Contribute to the goal for carbon neutrality by 2050 through a long-term sustainability plan is organized around the reduction of three (3) major sources of GHG emissions: buildings, transportation, and waste.

- Design the Project to be consistent with the intent of many of the credits and strategies defined in the LEEDv4 for Neighborhood Development Plan rating system and, thus, is expected to result in a better more sustainable and well-connected neighborhood district.

Additionally, based on discussions with MEPA and City of Boston during the public review and comment period for the DEIR/DPIR, the proponent further committed to the following CO₂ emissions reductions strategies;

- Install at least 2MW of rooftop solar PV estimated to produce 2,300 MWh of carbon-free electricity annually, further reducing GHG emissions by 813 tons per year (per today's emissions factor) when fully operational.
- All townhouses (22 total) along Waldemar Avenue will be Passive House- and/or E+ (Energy Positive) equivalent.
- All single-family homes (12 total) along Waldemar Avenue will be Passive House and/or E+ (Energy Positive) equivalent.
- Construct one (1) Passive House (or equivalent) Demonstration Project of a minimum 50,000 square foot multi-family residential building.

The proponent also refined the above-referenced DEIR/DPIR commitment to LEED certifiable buildings by committing to the following:

- Minimum of 5% of buildings to be LEED Platinum certifiable level;
- Minimum of 75% of buildings to be LEED Gold certifiable level; and
- Maximum of 20% of buildings to be LEED Silver certifiable level.

21. Please provide the LEED checklists for each building in Phase I.

Attached, please find LEED checklists submitted in the DEIR which will be refined as each building goes through design review.

The proponent is committed to constructing all buildings to LEED Certifiable standards. Buildings erected in Phase 1 will exceed the requirements of Article 37 of the Boston Zoning Code, with building design criteria meeting or surpassing the LEEDv4 Silver rating for all Phase 1 buildings and meeting the standards for LEEDv4 Gold for at least 50% of the Phase 1 buildings.

22. Provide generic LEED checklist

Please find available for download: <https://www.usgbc.org/resources/leed-v4-building-design-and-construction-checklist>



FAQ: Suffolk Downs & Planned Development Areas

What is Suffolk Downs and what is proposed for the site?

Suffolk Downs is a site located in East Boston and Revere. The City of Boston is reviewing a proposal to develop 109 acres, or roughly the size of 82 American Football fields, on the Boston portion of the site. A developer, HYM Investment Group, purchased the property in 2017 for about \$155 million and is proposing to build housing and commercial buildings, also including privately-owned, publicly accessible open spaces. The Boston portion could have 7000 units of housing as well as offices, a hotel, shops & 27 acres of open space.

Where can I read the proposal and get updates on the city's review?

You can read the proposal in several ways. First, the city's website for the project is at <http://www.bostonplans.org/projects/development-projects/suffolk-downs>. You can also view the project files at <http://bit.ly/suffolkdownspda>. Contact HYM, the Boston Planning and Development Agency (BPDA) or Councilor Edwards for a print copy.

Can I comment on Suffolk Downs' proposal? When is the deadline?

Yes, and you should! To file an official comment on Suffolk Downs, you can email the project manager, tim.czerwienski@boston.gov, send a letter to Tim Czerwienski, Boston Planning & Development Agency, One City Hall Square, Boston, MA 02201 or visit http://www.bostonplans.org/projects/development-projects/suffolk-downs#comment_Form.

I'm no expert. Is my opinion worth sharing? How can I make my comment most useful?

Yes, your opinion is essential! This project will shape decades of development, but the most critical public approvals are happening this year. You may want to focus on the topic you care most about and the associated "public benefit" or commitment from HYM. For example, in the Master Plan document, you can read about Housing (pages 9 and 10), Transportation (pages 8-9), Open Space (pages 3-4 and [Exhibit F](#)), Climate Resiliency (spread across sections) and Public Benefits (pages 10-12 and [Exhibit J](#)). Exhibit H shows the phases of development.

What if there is no information or not enough information about an issue I care about?

If you can't find what you need, that alone is enough for a comment, and you should comment as soon as possible and also notify the Office of Councilor Edwards.

What kind of public benefit will this project create, according to the proposal?

The proponent claims the project will generate >**\$170** million in public benefit through roadways, sidewalks, bicycle paths, and pedestrian paths, water, sewer and storm drainage facilities, and open space areas, as well as property tax revenue and a limited amount of deed-restricted (price controlled) and senior housing, and a small community room. The current public benefit package is the result of HYM's conversation with city and state agencies and city policy, but has not been fully vetted by community or residents groups. *It is not clear from the filing itself what benefits are in Boston or East Boston, but approximately \$50m are for off-site roadway changes.*

What is a [Planned Development Area \(PDA\)](#)? What does the PDA document do?

A planned development area is a special set of zoning rules for large areas of at least one acre, with a master plan required for projects over five acres. The PDA filing is a regulatory document that locks into place rules and requirements for development in a specific (large) area.

Specifically, the PDA addresses:

- (1) What can be built and how;
- (2) Information about the site itself and plan for the physical area;
- (3) Public and community benefits the developer commits to; and
- (4) The process going forward.

What is Zoning?

Zoning is a form of law and regulation that guides development and planning, protects public health, ensures community benefits and sets expectations for how our city should change and grow. In Boston, zoning is proposed by the Boston Redevelopment Authority and Boston Zoning Commission. Inspectional Services enforces the zoning code itself, but in some cases, the BPDA staff may be charged with enforcing the rules our city sets in place.

What should I know about the Planned Development Area (PDA) process?

Developers initiate the process by proposing their own regulations, consistent with city zoning. The BPDA and city staff review the proposal and take public input on it. Planned development areas trigger a mandatory comment deadline of at least 45 days (Suffolk Downs' is 90 days). To approve a PDA, the Director of the Boston Redevelopment Authority must issue a "Certification of Consistency."

After the comment period, the BPDA has [three options](#): approve the plan, conditionally approve the plan, or disapprove the plan. If the BPDA's Director is supportive, the PDA goes for a vote at the BPDA board and the Zoning Commission. Inspectional Services cannot issue building permits until all this, and the project's design review, is approved. If substantial changes are proposed later, they go back to the BPDA board and zoning commission. The whole Planned Development Area process is governed by [Section 80-C](#) of the zoning code and by a [2014 BPDA policy](#).

What are the city's [criteria for approval](#) of Planned Development Areas?

There are five basic criteria for approval of PDAs, which can be summarized as:

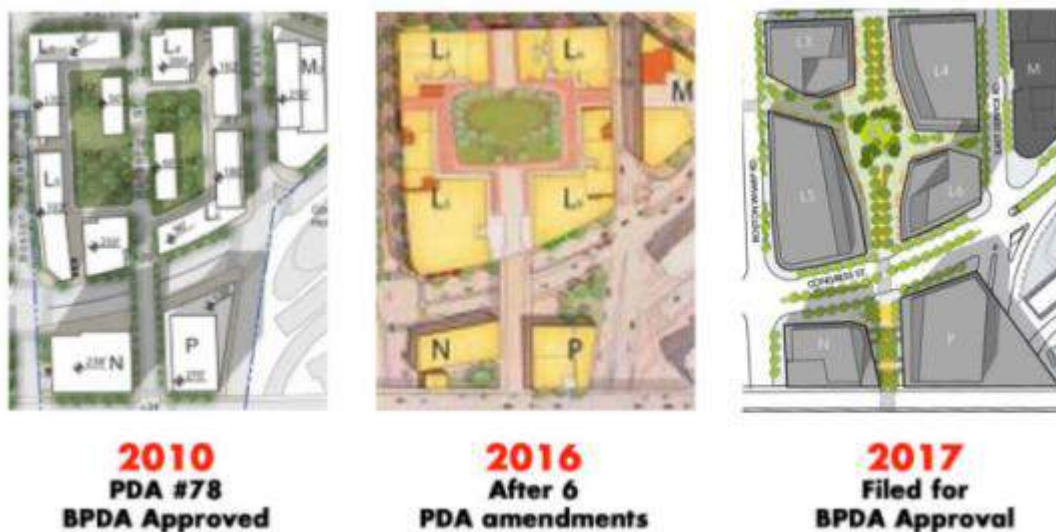
- The PDA matches the **base or underlying requirements**, for example, density of development, PDAs are **allowed in the area** and **geographically conform** with their district or neighborhood
- The PDA meets the **public benefits** & other criteria required by the underlying zoning
- Finally, the PDA as a whole must "**not be injurious to the neighborhood or otherwise detrimental to the public welfare, weighing all the benefits and burdens**".

Can changes to be made after the PDA is approved?

Yes. Substantial amendments to the PDA need to be approved by two quasi-public entities, the Boston Redevelopment Authority board and the Zoning Commission, and these changes do require public meetings and a public vote. In most cases, these changes are minor, such as allowing office space in an ground floor unit zoned for retail. However, changes could potentially be made to public benefits that are not secured in separate agreements. Additionally, some changes specific to individual buildings, such as adjustment of unit mix or affordability levels, can be made by the BPDA board *without* the zoning commission.

Is there a precedent for PDAs of this scale? What about significant changes to PDAs?

Yes, although Suffolk Downs is larger. The Seaport Square development in South Boston is a relevant learning opportunity both due to size and because of changes over time. Unfortunately, public benefits such as large open space and civic space were later removed via amendment. A graphic from Fort Point resident Steve Hollinger encapsulates the shift.



Are there ways to ensure benefits I care about cannot be amended or removed?

Yes, there are several. First, the PDA filing itself establishes certain ground rules and indicates a process for amendment. Currently, these are specified on page 13 of the Master Plan. Beyond that, the development review process will involve several other binding agreements between the City of Boston and HYM. Additionally, certain restrictions may be put onto the deeds of some or all properties in Suffolk Downs. For example, deed restrictions could guarantee affordability or ensure open space is conserved. At 5-6 Necco Court, the site General Electric has put up for sale, a deed restriction is ensuring open space will remain for 95 years regardless of who owns the site. Public or private entities can “hold” the restriction.

What other processes will follow if the PDA is approved? Individual buildings on-site must go through Article 80 Review as they are proposed, and the Suffolk Downs site also goes through design review at the [Boston Civic Design Commission](#).

Can you clarify the Boston Planning and Development Agency's role¹ in this process?

The Boston Redevelopment Authority plays multiple functions: neighborhood planning, promoting development, negotiating benefits, writing zoning and ensuring compliance with areas like the Boston Residents Jobs Policy. Because the BPDA board must ultimately vote on the PDA, the agency holds a level of *regulatory authority* and is ultimately responsible for ensuring the project is good for Boston. A plan that goes forward should support other city goals, such as preventing displacement and reducing greenhouse gas emissions.

What kind of agreements will Boston make with Suffolk Downs' Developer?

There are several agreements that City agencies, the Boston Redevelopment Authority and Developer must make to comply with the current zoning code. The city *may* make other agreements, which could include anything from public benefits to a schedule of tax payments. Some items that go to the BPDA/BPDA board are presented with a detailed memo for a vote and are then included in separate legal commitments.

Agreements through the development process include:

Cooperation Agreement (with BPDA, may include other agencies) - The Cooperation Agreement is a legal agreement entered into by the BPDA and a developer after the completion of the Article 80 review process. The Cooperation Agreement details public benefits and mitigation to be provided by the project. If the usual process is held, the project's Impact Advisory Group is given a 15-day review period of the final draft.

Affordable Housing Agreement (with BPDA) - These agreements clarify how the project will comply with city affordability guidelines (1) across the site and (2) within each development.

Boston Residents Jobs Policy (with BPDA) - This agreement clarifies that the project agrees to city policy to employ certain percentages of residents, women and people of color in construction jobs.

Development Impact Project (DIP/linkage, with BPDA)² - Clarifies how the project will pay into city housing and jobs funds. In some cases, these agreements may seek to match jobs funds to actual employment created on-site.

Transportation Access Plan, Master Transportation Improvement Agreement³ (with Boston Transportation Department) - These agreements deal with traffic management; parking; construction management and monitoring and associated public benefit commitments. Typically, an agreement is made for the project and for individual buildings.

¹ Specific to housing, read more here: <http://www.bostonplans.org/housing/overview>

² [Section 80B-7](#) of the zoning code

³ Section 80B-3.1 of the zoning code, BTM policy

Key Issues for City and Community Review

Housing

According to public presentations, HYM has proposed roughly 7000 units for East Boston and 3000 for Revere. The size of the development is roughly equivalent to 1/6th of all housing the City of Boston plans for in its 2030 goals. The PDA filing is not specific on unit count, but identifies 10,520,000 square feet of gross floor area, of which 7,310,000 are residential. Phase one includes 745,000 square feet of residential gross floor area & a [separate BPDA document](#) identifies 800 residential units in the first phase.⁴ Additionally, 10% of residential space in the entire project will be senior housing, 13% of units will be “inclusionary” units and 13% of senior housing will be inclusionary. The exact count is unclear, but to reiterate, 13% of a unit count that comprises 10% of residential space will be senior housing.

According to [one recent study](#), the average apartment size in Boston was 817 square feet, with 526 for studios, 722 for one-bedrooms & 1037 for two-bedroom apartments. Residential gross floor area is a measure from building exterior and the floor area count also includes “accessory” space within residential areas, so the measurements are not perfectly comparable.

How much housing will be income-restricted? How affordable will the housing be?

If 7000 units are constructed in Boston and the project is built with the 13% inclusionary development requirement, approximately 910 units will be inclusionary units, 700 will be senior housing and 91 units will be inclusionary senior housing.

The City of Boston’s current inclusionary development policy targets renters earning up to 70% of Area Median Income (AMI) or homeowners earning 80-100% AMI. In inclusionary units at 70% AMI, rents for a household of four earning up to \$79,300 would be capped at \$1850, or, for an individual earning up to \$55,550, rents in inclusionary units would be capped between \$844 for SROs, \$1,125 for studios or \$1318 for one bedroom units. If units were restricted to 50% AMI, rents for a household of four earning up to \$56,650 would be capped at \$1,284 or, for an individual earning up to \$37,750, rents would be capped at \$589 for SROs, \$785 for studio apartments and \$922 for one bedroom units. The proposal for Suffolk Downs does not contain SROs, but does contain studio units. More information is available on the BPDA’s website.⁵

How do these affordability levels relate to what we know about Bostonians’ incomes?

According to [Boston in Context](#), a BPDA report, the median household income in Boston is \$62,021.⁶ In East Boston, median household income is lower at \$52,935. An analysis by the Boston Tenant Coalition notes that for Latino families (\$31,400), black families (\$35,800) and renters overall (\$38,200) household income is even lower, while homeowners (\$104,300) and white households (\$88,100) have higher incomes. The BPDA’s report also shows income per capita in Boston is \$39,686, and in East Boston, \$26,569. Boston is primarily a city of renters, with 64% citywide and 71.4% in East Boston renting.

⁴ <http://www.bostonplans.org/getattachment/0753c2f2-0d0a-478a-a102-b24876c86bbe>

⁵ <http://www.bostonplans.org/housing/income,-asset,-and-price-limits>

⁶ <http://www.bostonplans.org/getattachment/8349ada7-6cc4-4d0a-a5d8-d2fb966ea4fe>

Based on these statistics, households earning around the median income in East Boston *may* qualify for and be able to afford rental units restricted for 50% AMI, but most would not be able to afford 70% AMI units. Most Black and Latino residents in Boston, and single income earners and households of renters in East Boston would struggle to afford either type of unit so without additional assistance. These populations tend towards closer to 30% of the AMI. Additionally, the vast majority of residential units, about 6000, would not be restricted in any fashion under the current proposal. Suffolk Downs' transportation modeling relied on figures of 1.58 persons per household. The average household size in East Boston is 2.8.

What if the city adjusts its affordability guidelines after the development is approved?

The BPDA's 2014 policy guidance on PDAs is unclear as to how the IDP should apply to multi-phase projects if the IDP is updated. However, *as the PDA is currently written*, the 13% inclusionary units will apply to every phase: stronger policies or deeper affordability requirements would not apply even if the IDP were updated at any point in the next 10 years. Regardless of whether the 13% affordability levels proposed in the PDA are adequate today, whether or not they will scale to match city policy updates is entirely at the BPDA's discretion.

What are the city's responsibilities to ensure housing opportunities for all residents?

The federal government established a rule in 2015 on "affirmatively furthering fair housing" (AFFH), a provision of the Fair Housing Act of 1968 that had never been implemented. AFFH means "taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics." The AFFH rule was delayed by the current president, but the rule remains in place and the City of Boston has committed to follow it regardless of federal action or inaction. The City is continuing to work on its AFFH plans.⁷

How does this relate to East Boston and planning at Suffolk Downs?

One major component of the AFFH process is an Analysis of Impediments to Fair Housing. In Boston's process to date, neighborhood segregation and displacement due to economic pressures have both been identified as issues impacting residents.⁸ East Boston has high numbers of Hispanic residents and Spanish language speakers as well as low-income renters vulnerable to displacement. The city is obligated to ensure neighborhood planning, such as that at Suffolk Downs, improves and does not exacerbate impediments to fair housing. Or, looking at the Planned Development Area guidelines, the plan must "not be injurious to the neighborhood or otherwise detrimental to the public welfare, weighing all the benefits and burdens." HYM has included "non-discrimination" language in its PDA filing, which is a positive step but by no means equivalent to fair housing.

⁷ <https://www.boston.gov/departments/neighborhood-development/assessment-fair-housing>

⁸ https://www.boston.gov/sites/default/files/document-file-08-2017/working_draft_2_-_part_ii.pdf

Transportation

HYM is proposing numerous transportation changes and investments with regards to Suffolk Downs, which are visible on page 38 or Exhibit J-3 of the PDA Master Plan. HYM is also conducting studies, at the request of city and state agencies, to identify transportation impact and volume of drivers on roads and passengers on the Blue Line. The project involves private transportation services, shuttles, and walking and cycling improvements, i.e. a network of trails. Currently, the project is heavily focused on highway improvements. On-site, the amount of parking proposed for Suffolk Downs is almost double city guidelines and recommendations.

What does the transportation modeling tell us about the project?

The BPDA has noted that “proponent’s modeling assumed approximately 1.58 persons per household.... average household size in East Boston is currently 2.8 persons per dwelling unit” (page 9).⁹ Additionally, the BPDA notes the persons per household in the Seaport is about 1.75 and that estimates suggest, by 2030, “the average household size citywide in Boston will be 2.1 and in East Boston specifically will be 2.6.” This *suggests* that, even without full clarity on proposed housing, the current proposal plans for small household/family size.

Will improvements to roads or infrastructure elsewhere be good for Boston residents?

Changes that reduce congestion, improve commute times or take cars off the road *could* help Boston residents. However, state agencies have expressed concerns with the current proposal (visible starting on page 297 of the state’s [Certificate for Suffolk Downs Draft Environmental Impact Report](#)).¹⁰ MassDOT has noted that inbound Route 1A expansion “*may result in additional cut-through traffic... in East Boston (south of Neptune road) during the AM peak.*”

Does the proposal encourage public transit ridership, bicycling or carpooling?

MassDOT notes that the proposal appears geared towards single-occupancy vehicles and, noting delays experienced today by commuter buses, requested the proponent look at rerouting North Shore buses to make a more transit-friendly proposal. \$50m of the proposed public benefits for Suffolk Downs are off-site roadway investments (DEIR 13). Additionally, proposed parking exceeds even the proponent’s estimate of peak parking by about 500 spaces (DEIR 14).

Where will a shuttle stop? Is it free? Can I ride it? Is it electric?

Details of the shuttle service (route, frequency, type of vehicle) are not entirely clear based on the proposal, but the proponent has expressed intent to provide a free, privately-managed, publicly accessible shuttle service that would operate between Suffolk Downs Station, serving North Station, South Station, Chelsea Station, and the Seaport. The Boston Transportation Department has requested the proponent also look at connecting with Orange Line stops such as Sullivan Square, Assembly, or Wellington. The BPDA has also suggested shuttles run every ten minutes and are coordinated with other BTM, MBTA and other private sector planning.

⁹ <http://www.bostonplans.org/getattachment/0753c2f2-0d0a-478a-a102-b24876c86bbe>

¹⁰ <https://eeaonline.eea.state.ma.us/EEA/emepa/mepacerts/2019/sc/eir/15783%20DEIR%20Suffolk%20Downs%20Redevelopment.pdf>

Climate Change & Greenhouse Gas Emissions:

Suffolk Downs is “the single largest development project in Boston’s history.”¹¹ The Draft Environmental Impact Report indicated that buildings in the development could generate as much as 72,554 - 90,230 tons of carbon emissions or equivalent pollution annually, and that mobile sources could generate as much as 128,015 tons annually (in and outside of Boston). The PDA filing includes new sustainability efforts such as “passive house” and energy positive (E+) homes. HYM has committed to solar-ready buildings and at least two megawatts (2 MW) of solar. The proposal intends to use ample open space investment, including planting of 1200 trees, as climate resiliency buffers and is working with the Boston on “Smart Utilities.”¹²

How will the project impact our city’s climate goals?

Building electricity and heat are the primary source of emissions in Boston and the added emissions are substantial. The City of Boston and the state Department of Energy Resources have both weighed in with suggested improvements, including promoting passive house systems, tying solar development to each building or phase, using combined heat and power systems (23-24).¹³ Transportation pollution will be dependent on how the project addresses the numerous comments from transportation advocates and city and state agencies.

It is unclear how the addition of passive house or energy positive homes will reduce overall project emissions or if additional sustainability measures are planned for the larger buildings. Additionally, HYM has not explained barriers to deeper energy resiliency measures such as a district energy microgrids. (Microgrids are local energy systems that can help keep power online, reduce emissions and make the best use of excess heat from power systems).

How specifically is the project complying with city climate & energy requirements?

The proponent has submitted “LEED” checklists to the BPDA, a requirement of Article 37 of the zoning code. These checklists have not, to date, been made public.

What about flooding? Are there outstanding concerns with climate resiliency on-site?

The BPDA has noted that the site is vulnerable to flooding “from the Chelsea Creek to the west, and through Revere to the north” (26) and also noted the need to discuss stormwater infrastructure to pump water offsite. The Conservation Law Foundation has also noted concerns about preparing for extreme precipitation, limiting stormwater discharge into the Chelsea Creek, and ensuring the project does not increase risk of hazard at nearby fuel terminals in Revere. Additionally, the current proposal by HYM suggests a flood barrier between Bennington Street and Belle Isle Marsh, which some organizations have noted should be analyzed both for its efficacy in comparison to other interventions and with regard to its impact on the marsh.

¹¹ <http://www.bostonplans.org/getattachment/0753c2f2-0d0a-478a-a102-b24876c86bbe>

¹² <http://www.bostonplans.org/getattachment/7b87a301-95da-4723-b3a9-02bfebd1b109>

¹³ <http://www.bostonplans.org/getattachment/0753c2f2-0d0a-478a-a102-b24876c86bbe>

Jobs and Economic Development:

How many jobs will the project create?

The developer estimates up to 14,000 new construction jobs and up to 25,000 - 50,000 new permanent jobs.

What commitments has HYM made to date regarding economic development?

HYM has committed to “approximately 10% allocation of retail space in the Master Project to local businesses with flexible lease terms pursuant to a plan to be approved by the PDA prior to the commencement of the first building within the PDA area” (PDA - page 11 / Exhibit J), jobs linkage fund payments (\$1.78/square foot of development - Exhibit J), and the creation of up to 14,000 new construction jobs and 25,000 - 50,000 new permanent jobs (Exhibit J).

What are “flexible lease terms” for businesses? How much will commercial rent cost?

It is unclear at this time what is meant by flexible lease terms or how much space will cost.

What standards apply to the jobs on site?

For construction jobs, the Boston Residents Jobs Policy requires employment of 51% residents, 40% people of color, and 12% women, based on total work hours per week. There are not prevailing wage or labor standards for the proposed development, outside of required by state or federal law. The PDA also does not include commitments regarding partnership with minority or women owned businesses (MWBES).

What industries *currently* employ people in East Boston?

Top employing industries in East Boston including air transportation + support services; hospitality; building services; the restaurant industry and other food and drink businesses; car/automotive equipment, rental and leasing; local government through education + schools; state government; as well as care and healthcare industries, outpatient treatment and retail.

Are Bostonians or East Bostonians prepared for work at Suffolk Downs? What strategies does the City of Boston believe will help workers access good jobs?

A report entitled *Untapped: Redefining Hiring in the New Economy*¹⁴ identifies numerous strategies—and needs—for preparing Bostonians to access good jobs. Building up English language skills and training (ESL/ESOL), apprenticeship programs (such as BEST Hospitality for hotel workers or Building Pathways for construction trades), and community college + vocational school partnerships with employers are several key strategies. Advocates have also noted lack of affordable childcare with flexible hours is a barrier for many working families. East Boston has a high foreign born, Spanish-language speaking population and many families with children. Language training in advance of development at Suffolk Downs could expand East Boston residents' opportunities to access good jobs.

¹⁴ <https://owd.boston.gov/wp-content/uploads/2019/03/Untapped-Redefining-Hiring-in-the-New-Economy.pdf>



Office of Councilor Lydia Edwards

**Boston City Councilor, District One
Chair, Housing and Community Development**

February 8th, 2019

Dear Mr. Czerwinski:

Thank you for your stewardship of the Planned Development Area review for Suffolk Downs. On behalf of Boston City Councilor Lydia Edwards, who represents District One, including the East Boston portions of Suffolk Downs that comprise the Planned Development Area, I am submitting the following questions into the record.

The questions have also been provided to the proponent, The HYM Investment Group, LLC.

We look forward to working with all stakeholders in reviewing the proposal and in securing the best results for East Boston and the City as a whole.

Regards,

Joel Wool
Director of Policy and Communications
Office of Councilor Lydia Edwards

Suffolk Downs - Initial Set of Questions

Housing

Please clarify the estimated *units* of housing produced in each phase, beginning with Phase One.

Please clarify the estimated units of housing, per building type (e.g. townhomes, apartment building, mixed-use, single family home).

Housing / Inclusionary Development:

Please identify the number of inclusionary development units estimated per phase.

Beginning with Phase I, please clarify if the project proponent intends to meet inclusionary development policy (IDP) goals with on-site, off-site or payout, a combination of all three, or if this has not been determined.

If meeting IDP goals with off-site compliance, does the proponent intend to direct off-site units to East Boston?

What is the estimated Residential Gross Floor Area per IDP unit? As necessary, please clarify distinctions per building model or type.

What is the estimated cost per IDP unit? What is the anticipated incremental cost of adding an inclusionary development unit on site? What is the anticipated incremental cost of adding an inclusionary development unit off site?

Please estimate the share of IDP units by affordability level, e.g. one-half of units at 70% AMI, 50% AMI, etc.

Please clarify breakdown of IDP rental vs. homeownership units.

Housing / Senior Housing

Page 9 of the PDA submission indicates at least 10% of residential space, including accessory units, will be senior housing, and that 13% of senior housing units will be IDP/affordable units.

Please clarify the number of *units* that will be senior housing units. Please clarify the proposed level of affordability for senior housing units built in compliance with the IDP.

Please clarify the number of senior units proposed in each phase of construction, beginning with Phase One.

Public Benefit / Phase I

Please provide, and submit into the record, a description of the mitigation that will be provided with respect to each building in in Phase I, in accordance with the mitigation schedule in Exhibit F, “**Summary of Public Benefits and Project-Related Mitigation Measures**”.

Public Benefit / Tax Revenue

Please provide a rough estimate tax revenue to the City of Boston for Phase I buildings, as proposed. Please provide a rough estimate of tax revenue to the City of Boston for all buildings, assuming project completion as proposed.

Public Benefit / Infrastructure Expenditures

The proponent identifies \$170 million in public infrastructure and open space investments on Page 11 and elsewhere in the PDA filing, including Exhibit J.

Please clarify Exhibit J and other description of public investment by identifying, valuing and itemizing:

- The infrastructure and open space investments at Suffolk Downs
- Other investments in East Boston, if any
- Proposed regular maintenance of infrastructure or open space which would otherwise be borne by City of Boston, and estimated annual cost
- Infrastructure investments elsewhere in Boston
- Investments not in the City of Boston
- Proposed investment to expand the inbound capacity of Route 1A

Please expand on any regarding the possible inclusion of a municipal building such as a school or fire station at the site (in addition to the 2,500 sq feet of ground floor community/civic space currently identified for temporary location in Belle Isle Square during Phase 1B).

Public Benefit / Open Space

Exhibit J shows the Central Common as being part of Phases 2B and 2R, while Exhibit H shows it as part of Phase 1B. Please clarify which phase of the project the Central Common will be a part of and what (if any) open space will be included in Phase 1B besides Belle Isle Square.

Please consider the addition a designated soccer area (fields with goals) to both Exhibit F and Page 3, Section 5, Subsection C.

Sustainability / Building Emissions

Building emissions are the greatest source of pollution in the City of Boston. In the DEIR/DPIR filing, the project proponent identified building emissions of roughly 72,554 - 90,230 tons. The MA Department of Public Utilities has since approved an energy efficiency plan indicating some support for Passive House construction/design. The PDA filing also implies a greater commitment toward Passive House Development / Energy Positive buildings but does not detail building emissions.

Please clarify if the overall proposed energy usage / building emissions have changed since the DEIR/DPIR filing. Please describe how passive house development does or does not account for any change.

Please clarify sustainability measures proposed for larger buildings or commercial spaces. Please provide the LEED checklists for each building in Phase I, or clarify when they will be available.



Tim Czerwienski <tim.czerwienski@boston.gov>

PDA Suffolk Downs Comments...

Cyberunions

Thu, Mar 28, 2019 at 9:41 AM

To: tim.czerwienski@boston.gov
Cc: lydia.edwards@boston.gov

Dear Tim,

Thank you for reading my comments and questions I have related questions to the Suffolk Downs Development Plan further below, this is my email of a many.

I have been a Boston resident since 1996 so I have seen the changes from the completion of the big dig the upgrades to the Blue Line all while seeing the impact of gentrification of communities that have little choice or options to stay.

We need to recognize your plan clearly has a tremendous impact on poorly planned development in Boston and East Boston in particular. Which is why I am talking to my neighbours, local workers, and friends about this development.

What are the financial investment plans for the MBTA both in terms of buses, expansion, as well as Blue line upgrades? In addition what financial resources will be put towards providing MBTA ferry services between East Boston and Longwarf, Charlestown, and the Seaport?

Will the streets in the Suffolk Downs be maintained by city hall?

There is a plan for 15,250 parking spaces, is that street parking? Or a combo of street and inside building parking? What is the number breakdown if it is split between the two?

As a resident who does not own a car, what are the plans to lower the dependency on vehicles?

How many parking spaces will be reserved for services like ZipCar and other car sharing programs?

Are their any plans to upgrade the streets between East Boston and Chelsea, including Beachum street through Everett to route 99?

Are their any plans for adding new MBTA services to accommodate the increase in residents? Including the poorly planned Silver Line or new services?

The target residents, are they to be commuters into the city? Or are their specific plans for housing residents that would be working on the Suffolk Downs lots?

In terms of the open park spaces, will they be city property? Will they be public land that is maintained by the Boston Parks Department?

As you may know about 10 years ago East Boston consolidated their two Boston Public Libraries into one near the Airport Stop on the Blue Line, are their plans with the BPL to build a 2nd library on the Suffolk Downs property?

With this addition of new residents what are the plans for public school development with the Boston Public Schools?

As you may be aware there is a public Pool and Gym on Paris St., are their plans with the Boston Center for Youth and Families to build a new venue on the Suffolk Downs property?

East Boston has a long history of being an immigrant working class community, what are the plans to provide housing? As a developer you are aware that the water front developments have plagued us long term residents with rent increases making it challenging to maintain a life in this community. Resident on my own street for 20 years have been kicked out of housing after landlords decided to upgrade and increase rent to unaffordable rates or convert to condos for multi employed households, what is being done to provide housing for these long term residents?

The average income in East Boston lower than other parts of the city, though the gentrification changes that it does not provide the upward mobility of the long term residents and instead pushes them outside the city when they are heavily

dependent on working downtown, what housing will you provide for these residents as they face the increase in rent? Myself included as my income is below the average of East Boston.

You maybe familiar with Assembly Row in Somerville, as friends of mine who have been impacted by that development, it is a city within the city, what are your plans to fully integrate the development into the city?

The seaport area is another city within the city, as I mentioned I am longterm resident and visiting the Seaport is like leaving Boston while still in it, the community has little to no connection to the city culturally and seems to be trying to bring in people from outside the city with a tremendous amount of wealth and privilege, what are you plans to prevent this from happening?

I will have more question during this comment period. Thank you again for reading them and I look forward to hearing from you soon!

~stephen mahood
116 Webster St. Apt 3

Statement on Suffolk Downs and Jobs

March 28, 2019

Action for Equity
Weezy Waldstein,

Most of Boston's residents are not reaping the benefits of today's booming economy. A large share of our residents—particularly residents of color—are at risk of displacement soon, driven out by that booming economy.

Today, Boston—and other cities—is facing “jobs-led displacement.” When there are a lot of new jobs that do not go to local residents, people moving in for the jobs push up the rents—driving out local people. That is what is facing us in East Boston.

Our data shows that only about a quarter of Boston's jobs go to Boston's residents. Others think the number is a third. In any case, well less than half the jobs go to Boston's residents. About half of our residents can't even find jobs in the city.

Median earnings are just \$34,000—nowhere near enough to stay in Boston. Boston's own data shows that people of color make less than white people at every education level. Boston residents make less than suburban people coming in to the city to work, at every education level. The report says this is in part due to residents and people of color being tracked into low wage jobs and occupations.

If there are going to be new jobs, there are several things these transformative jobs must be required to provide:

- Good quality—starting hourly wage about \$20, 75% of the jobs full time, benefits and stable shift
- Fair access—majority for Boston residents, local residents and residents of color at all levels, in all departments, in all employers on site and for all contractors
- Pipeline hiring process—tied to local community organizations that have a seat at the table

We are already winning these things.

But none of this will matter if something isn't done about displacement now. Today's residents won't be here by the time this new development is complete and new companies have set up shop.

In addition to protecting our current residents from displacement, without real programs, East Boston's residents may not be qualified for the upcoming jobs.

What we have learned from our community pipeline to Encore jobs is that people who have the skills, work history, and strong labor market attachment are being excluded because of increasing expectation of higher levels of English. This is not a quick fix. We need a large investment in ESL that creates free classes at the times of day and week and location that are most convenient to people. We can't set boutique requirements that limit who is eligible—only for people who can commit 6 hours a week or only for people who can go during the weekday. We can't say that if you drop out, you lose your seat forever—life happens—we need a real right of return to these programs. This needs to start now with a massive upfront commitment of resources to the local community for this and other anti-displacement programming—not a commitment that comes only after everything is built and everyone is gone.



Tim Czerwienski <tim.czerwienski@boston.gov>

Fwd: Suffolk Downs Development HYM Proposal

Lydia Edwards <lydia.edwards@boston.gov>
To: Tim Czerwienski <tim.czerwienski@boston.gov>

Thu, Apr 4, 2019 at 1:35 PM

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

From: **Renee MacLean**
Date: Thu, Apr 4, 2019, 11:38 AM
Subject: Suffolk Downs Development HYM Proposal
To: tim.czerwienski@boston.gov <tim.czerwienski@boston.gov>
Cc: lydia.edwards@boston.gov <lydia.edwards@boston.gov> ,

Hello, Tim - (I heard from a reliable source that you're "very nice" 😊)...

I'm requesting an **extended comment date beyond May 2019** for the Suffolk Downs Development HYM proposal. I attended and spoke at an evening community meeting in East Boston on April 2nd, which City Councilor Lydia Edwards also attended. **It is clear to me that East Boston residents need more time to thoughtfully be able to voice their concerns and ideas regarding this development.** I hope you will agree and extend the comment and feedback deadline. Btw, I remain a life-long East Boston resident and also work in Eastie.

Sincerely,

Renée MacLean, MSW, LADC I
Licensed Alcohol & Drug Counselor
CleanSlate Centers
[82 Paris Street, 3rd Floor](#)
East Boston, MA 02128
Call Center Tele:
Email:
www.CleanSlateCenters.com

At , we specialize in the treatment of addiction using FDA-approved medications. We focus on treating opioid and alcohol addictions.

Ations. We focus on treating opioid and alcohol addictions.

First Name	Last Name	Comment	Question
Jeffrey	Timberlake	I think Suffolk Downs should include a center for our homeless population. It is the right thing to do. Sandra from the East Boston Community Soup Kitchen should be your point person.	
Mathew	Walsh	Increase the amount of affordable housing. Lower the AMI threshold from 70% to a more appropriate threshold for East Boston. Impose a required % of homeless housing for medium and large buildings.	
Daniel	Theriacult		Why are there so many condos in this city?
Britta	Carlson	We need to extend the public comment period until no sooner than September 1, 2019. Set aside no less than 10% of units for the homeless. The residents of East Boston should have an opportunity to vote to approve the plan. Set aside a land trust to be run as a co-op. It should contain no less than 1,000 units. Have 33% affordable units for people earning 10-40% AMI.	Why is HYM proposing a zoning procedure? This should be part of the East Boston Matern Plan.
Blake	Shetler	Suffolk Downs should have 33% units be affordable housing, based on 10-40% AMI. There should be a 25% homeless set aside. Furthermore, the development should include recovery homes, programs, and shelters, as well as provide funds to East Boston area service providers & justice organizations. Poner cada parte del proyecto, cada nivel, a un voto popular para ave la gente de East Boston puedan afirmar o negar. Además, necesitamos mas tiempo para decidir, el otoño 2019.	
John	Walkey	Deepen the level of affordability (30% of AMI of East Boston) and the amount (not 13% but 25%). Include opportunities for establishment of Recovery House/Services Center of some sort. Extend the comment period for more time!	
Nathalie	Garcia	Suffolk Downs should consider the things that make a neighborhood. They are taking a <u>huge</u> chunk of East Boston land and should be held to a higher standard than the basic. They will make a lot more money than they will invest. They should use some of that money for community supportive services, such as addiction treatment, homelessness rehabilitation.	

First Name	Last Name	Comment	Question
Stephen	Mahoud	Suffolk Downs should be public land, not just publicly accessible, but publicly owned. There should be a public library, public schools, public pool, and gym. There should be public housing.	
Mireya	Gomez	It's only x Rich people. No displacement. More transparent in the process. No increase rent now to then.	Can or it is possible increase of 13% for affordable house, because it more poor people?
Tricia	Peck	1. Suffolk Downs should provide forums/publicity/funding sponsorship for its customers and residents to learn how to support and be part of the community here. As a new homeowner in Orient Heights - I am excited to hear about developments like this but I want to learn more about things like the soup kitchen and how I can support local needs and businesses. 2. Should have zoning for recovery/public service space. 3. Should have an affordable grocery store (not Whole Foods!)	
Maria	Belen Power	We need to more time! 6 more months!	
Steven	Roussel	1. We need more time. 2. Dudley Street Initiative 3. Environmental Plan. 4. Training Linkage Money 5. Water transportation through Massport, Suffolk Downs. There should be a canal with a waterway. If we can get Suffolk Downs to connect to East Boston by waterway. 6. Job training set directly from linkage 7. Boston Betterment agreement 8. Copy Dudley Street in always putting affordable housing	
Frank	Spolsino	We need to extend the public comment period until no earlier than September 1, 2019.	
Emily	Martin	Suffolk Downs should include more community space, including rooms for communiyy meetings and other gatherings. Suffolk Downs should alsow include more "set aside" housing for homesless and lower-income and affordable housing for families. <u>Day Care Facility</u> with affordable rates.	
Don	Nanstad	Rooming houses of the past. We need S.R.D's- HYM could fund... Allocate some land at Suffolk Downs for development by an East Boston initiative- also funding for.	

First Name	Last Name	Comment	Question
Mary	Cole	Use East Boston Area median income (AMI) not regional or Boston AMI. Have project follow higher of PDA affordable percentage or current city policy when project is built.	
Sarah	Tooley	Suffolk Downs should 1. Provide space for a homeless shelter/soup kitchen that East Boston Community Soup Kitchen could run to serve more people in the community in a more effective way. 2. Provide 20% affordable housing, 50% of which should be 50% AMI	
Lydje	Lahens	The 13% affordable housing is disproportionately low. It does not meet the needs of the community. That number should be increased to a more meaningful number that improves community health. Additionally \$1,800 monthly rental fee is too high for East Boston. Evidence shows that rent in this local area should be about \$1,200 monthly.	I didn't hear as part of the plan community gardens, parks, bike lanes, job creation, and other elements that make a healthy community. Can you provide more information about those efforts and if they are being incorporated in the plans? Also, what are your plans to help build community empowerment?
Mike	Freedberg	Suffolk Downs should assume substantial open space connected to and integrated with Belle Isle Marsh. It should <u>not</u> build more than a <u>minimum</u> few units of less than 750-850 square feet. Density may be good on the outside but not on the inside.	As I understand section (8) it deals with market rate housing; it should not overlap with amount set asides. Is this not so?
Luis	Erazo	Hola, necesitamos unidades a buen precio. Lomas importante fuera que ubiquen unidades para la clase baja: y lomas importante fuera que ubiquen mas unidades 35% solo para clase baja fuera lomas importante primero Dios eso se nos da yoii estoy viviendo un de salgo!!	
Sonya	Patterson	Suffolk Downs should not be build high price of home.	I want to know about affordable housing.
Luz	Gonzalez		

First Name	Last Name	Comment	Question
Trent	Shepard	The Proposed development should have more than 13% low-income housing because East Boston's AMI is significantly lower than the rest of the city. The proposed development should include a full-service [shelter, showers, food, counseling, job-help, etc.] Center that is funded through development, partners with existing works like the soup kitchen and sets a new standard for how developments happen in the city. The proposed developmemnt should have a clinic or hospital that serves the vulnerable in our area. The proposed development should address eeducational needs in the immediate area. The proposed development should be shaped by the 5 principles of development that came through a community process and is articulated at: eastboston2030.wordpress.com The Comment period should extend much later than May 6.	How is just 90 days possibly long enough for East Boston to a serious informed and Robust conversation that is about the largest development in a generation for East Boston? Has the city of the development group consulted with the 5 principles for development at Eastboston2030.wordpress.com? Why has this one development group beenn entrusted with this massive piece of land, and why is it not parceled out in a wiser, more equitable way?
Sindy	Castillo	Build a new city in East Boston without did a voting right sin a neighborhood-wide referencum on any plans ultimate forged by HYM City of Boston regarding SP, Rezoning efforts, and eversource electronic and plant.	
Hector	Carraseo	Suffolk Downs should increase the percentage of affordable housing to 25%. It should hear the community more. Push the May 6th deadline to at least December 2020.	
Sandra	Nijjas		Can HYM help my soup kitchen have its own building and allocate a percentage of funds to the soup kitchen for us to continue to help those in need?
Lanika	Sanders	Suffolk Downs should allocate resources to center to act as a resource bridge for homeless population/people struggling with addiction, run by the East Boston Community Soup Kitchen.	

First Name	Last Name	Comment	Question
MJ	Donoghue	Understand that there is a win-win paradigm beyond the win-lose paradigm that often exists in our society. There is potential for building a relationship with the community that accounts for who actually lives here. The average median income for Boston is a false number hovering around 70-100k the real data suggests \$52k, Revere is \$37k. Many Immigrants, homeless, underemployed, making much less. Please put people before profits or we will lose the soul of our city.	How does increased access to gambling, drinking, and partying etc. impact a community? Have there been studies on similar projects?
Tanya	Hahnel	Suffolk Downs should be held to a higher standard than 13% affordability. With this density, and an opportunity to address much needed affordable housing, it should be requested to develop 20% of the housing as affordable (or the higher of the then IDP policy limit). Should also include as an as-of-right type of development all types of supportive service housing, including housing for victims of domestic violence, and shelters of all types.	
Bruce	Jones	Teach more critical thinking in high school.	Would you consider teaching more people self defense? Maybe have self-defense classes for the neighborhood. Teach more teens about how to pay bills, live, and to get and keep a job. Teaching them the right skills to survive in the real world. Would you consider having mental health clinics? Consider having more soup kitchens at churches and community centers? Maybe consider teaching more people critical would you consider teaching more people thinking skills? People people skills?
Baljinder	Nijjar	I would like to see a building and money allocated to the soup kitchen, so this organization can help people in need.	
Rowan	Sockwell	Allocate a portion of the public benefit funds to organizations that work with the homeless population of East Boston. Specifically, the East Boston Soup Kitchen!	

First Name	Last Name	Comment	Question	Spanish Translation if needed
Noemy	Rodriguez	Como madre de familia quiero que sean mas justos y mas considerados ante toda esta sifocion	Si las rentas son restringidas y la confidad minima para codificar es \$48,000 que pasara con las personas que no tengan esa cantidad? Que va a pasar? Quiero Saber: Porque dice familias pequenas si soy madre de tres hijos. Va ver preferencia para las familias de East Boston? Pueder aumentar el porcentaje mas del 13% para que tengamos reca oportunidad? Habron porques recretivos para las familias que habiten ahi? Queremos mas vivienda digmas y justas?	As a mother of a family I want you all to be a little more just and considerate of before anything else //If rent is restricted, and the minimum to qualify is \$48,000 what would happen to the people who don't have \$48,000? Why only mention small families when for example, am a mother of 3? Will there be priority for East Boston residents? Can we increase the percentage more than 13% so that we can have more opportunities? Will there be recreational parks (or any sort of recreational facilities) for the families that live there? We want housing that is more fair and just.
Mireya	Gomez	no deberian cambiar mi vecindario a un lujoso x que esto incrementa el valor de vida. Deberiamos mantener muerta comunidad diversa. // It's only for rich people. No displacement. More transparent in the process. no increase rent now to then.	Can or it is possible increase of 13% for affordable house, because it more poor people? Sel mas reales las estadistas del valor de rentas en East Boston. Se deberia ampliar el 13% de viviendas para las [ersonas de bajo ingresos. Habra prioridad para los residentes de East Boston, para obtenes vivienda. El trafico seria un caos? si actualmente es difical como se trabajara en este asanto. El transporte publico será amejorado?	You should not change my neighborhood, this only benefits the rich, we should maintain our diverse communitiy
Mike	Russo		How do we prevent this from being just another South Boston waterfront?	
Gerardo	Chacón Hernandez	Este proyecto nodeberia canibiar la felisidad delacomunidad el proyecto nolobeo mal pero lomal es la incomovidad de la comunidad. Por temor acer des plasados por este proyecto por tos enmentos derrenta kebendran. Ami meparece 120 piesdealtura esdemasiado para altura de esa altura ceria un riesgo demasiado alto deberia cer muchos altura.	Mi pregunta es den la oportunidad de ketodoslosbancos puedan dar prestamos para personas keganan entre 52000 y 25000 queden prestamos para estas personas ke puedan conpras pooke muchas personas ganan esa cantidad y nequalifican y eso es como una descriminacion alas comunidad pobre eso ceria bueno kela ciudad pudiera ayudar a estas personas para poder conprar. Su propida casa kenosden oportunidades. Mi pregunta es kebana cer con la ceguridad comolaban al ministras vacer depate de la polisia o sikiures y con el transporte publico comobanacer an mentarmas de le ketenemos o basegir lo mismo anmentando mas xmas obana cer al goal respeto.	

First Name	Last Name	Comment	Question	Spanish Translation if needed
Dan	Bailey	Should be an extension of the surrounding East Boston Community in terms of composition and diversity. Anything less will create a new, economically and racially segregated enclave within East Boston. Accomplishing this goal will take bold, drastic measures well beyond the status quo to ensure that housing and retail space at Suffolk Downs is truly affordable to a full cross-section of the existing community in East Boston.	What are the City's broad goals and vision for Suffolk Downs? What values are the City using to guide decision-making around development at Suffolk Downs?	
Don	Nanstad	1. "should" - City should adopt such a policy [potentially referring to Obama Fair Housing and his question]. 2. City of Boston should establish and maintain records, organized affordment of all "agreements" with Suffolk Downs 3. Suffolk Downs should accept a plan to provide housing commensurate with rates of tenants forced out by prices and condos in the past 4. Develop more "affordable" units in the development 5. Should include substantially more affordable units 2-3 bedrooms at <u>substantially</u> low income standard. 6. Should develop/accept plan with funding structured for substantial E.B. resident ownership at E.B. standard of affordability. (E.B. public foundation)	The Obama Extension of "Fair Housing"...is that codified into requirements?	
Mary	Berminger		1. IAG plans if we are keeping it as is, we have 5 years before East Boston starts 2. Codifying Public Benefits	
Ed	Coletta	Should use affordability guidelines/criteria that tracks to the City of Boston and East Boston specifically and its data and not tie it to the data generated by the full Greater Boston area. Using the whole area will skew the data in a negative way for East Boston.	1. With the Belle Isle Creek cutting through the site connected to the Belle Isle Marsh and the ocean beyond, will the development plans take into account the wetland areas and plan for climate change and sea level rise? 2. Should market conditions, or a catastrophic situation, etc. impact the developer (HYM) and cause them to sell or move the rest of the project to another developer/entity, are there legal requirements written that bind the new entity to the agreed upon benefits and mitigation measures?	

First Name	Last Name	Comment	Question	Spanish Translation if needed
Margaret	Farmer	1. We should be allowed to negotiate mitigation up only. 2. All roofs should be green roofs. At minimum put grass, letting dogs go up there. 3. Proposed affordable units are miniscule- itself being a form of discrimination 4. More variety in affordability levels. 5. Limit luxury housing the same way you limit affordable housing 6. Also, zone for occupancy, not investment. 7. Plan a majority of affordable senior units to be larger than proposed.	1. Do East Boston Residents get first chance to get affordable units? 2. East Boston is a family oriented community, how does this plan meet the needs of families? 3. More discussion of what a "private" development means- long term. During building I understand. But once building is complete - how do we ensure agreements for the community maintained? I had so many hopes for a "world class" community. Forward thinking and amazing. Although there are positive design elements, I am disappointed to see so many minimums. Minimum green space, minimum affordable housing. Minimum benefit to <u>Everyone</u> but the developers.	
Sindy	Castillo	Suffolk Downs should change the units that will be inclusionary since most of the people who live in East Boston are in low income.	What priority will have residents of East Boston to buy house in this project?	
Alexandra	Zuluaga		1. Will there be resource centers, family space/community space designated? 2. Does community pressure have power to push developers closer to a realistic "persons per household" average, therefore pushing towards more appropriate square footage/unit layouts? 3. will there be units for extremely low income individuals (30% and AMI)? 4. Will there be a lottery for admission to affordable units? 5. How long will it be accepting applications, and what kind of preference will be afforded to East Boston residents?	
John	Walkey	1. IAG should be set for seen style (?) 2. Deed restriction for Public Benefits	1. How are community benefits enforced? 2. How does the community know about and track the delivery of these benefits? 3. Can we break down for each phase the number of units (bedrooms, etc.) , average sq. footage of those and of those- how many are affordable? 4. How many are ownership vs. rentals? 5. Will there be a private security firm providing security? 6. Confused by Public D.C. Area Standards "geographically conform to area"- what does that mean?	

First Name	Last Name	Comment	Question	Spanish Translation if needed
Omar	Contreras	<p>Quiero que Suffolk Downs tenga vivienda para nuestra comunidad de Bejos Recurso Que puede vivir dignidad y respeto o que tengamos accesibilidad para comprar un condominio para que nuestra comunidad no se desplace por el desarrollo. Es importante que la renta sea accesible pero nuestra comunidad que hay gente de 3 cuartos para familias modestas. 4 el costo sea mínimo porque hay algo en Boston mas que incremento la renta pero no el salario por eso vemos desplazamiento en nuestros vecindarios. También es importante que la vivienda sea para todos que nos eamos desatendidos por el color o raza social. O por que no tener documentos por lo cual hay muchos estados que aplican esta ley y es lo que menos queremos.</p>	<p>Es de desear que se vean escuelas publicas centro comunitario para la comunidad y iglesia lo cual en este desarrollo no se ve eso? También es importante que la ciudad entera de apoyar permiso pero un desarrollo con esta multitud fuera bueno primero con sustento con la comunidad?</p>	

First Name	Last Name	Comment	Question	Translation (Spanish)
Charles	Purnell	I'm a apprentice in local 4. I think it will be a great idea if your project will be union for the growth of a apprentice. My future relies on your project.		
Kerry	Carbone	Considering the future of this community, and the preservation of the middle class, and raising low income families out of poverty- this will be accomplished by building a 100% union project. Safety, education, wages, equity for women, and minorities = 100% union built project! Thank you.		
Chad	Carbone	A quality long term project with health care and other benefits is only available with union support.		
Jennifer	Lunardi	Largest Project in Boston should absolutely BE UNION. Consider fairly/local businesses as renters and owners within this space.		
John	Deulin			
Rafael	Cabral	Suffolk Downs should go Union and more Affordable Housing for the Community.		
Alejandro	Magana	Suffolk Downs should go union all the way. Gives young people like me an opportunity for work. (2nd year apprentice 20 years old)		
Anthony	Santosuosso	AShould be unioned/ I'm a local 402 DC-35 Painters Union		
Gary	Cheetham	Local to Boston Mechanical Insulators. Non-union insulators cut corners, corners cut when insulating lead to energy lost. Thus, long term cost of using cheap labor ends up higher than initial cost of union labor.		
Judith	Flynn	Suffolk Downs should be all union and have a project labor agreement.		
Anice	Brandao	As a minority, female, Boston resident, & Building Pathways graduate I would like to know will you be working alongside with Building Pathways? if it wasn't for them, I wouldn't have a career in Local 550!		
Paul	Doherty	Suffolk Downs should be all union. Should have affordable housing.		
Robert	Monteiro	Suffolk Downs should have a similar development as Assembly Square mall. Looking for the improvement of the city and moving forward to matching the citys that have improved city of Boston/East Boston for the city of Revere. Must be union built.		
Stephen	Mahood		Will there be a card-check agreement for the Hotels and offer facilities on site? Will there be affordable retail for locally owned co-ops?	

First Name	Last Name	Comment	Question	Translation (Spanish)
Shawn	Anderson	Suffolk Downs should go union and it means 1st time quality and safety, well trained labor. Suffolk Downs should NOT go open non-union shop not safe. Do you want to be at a funeral for a non-union employee and tell them that kida that their Dad is not coming home?		
M	Meca	Suffolk Downs should be 100% union.		
Richard	Escobar	I am a union apprentice, and I feel that this project should employ skillful union workers so that I, who has lived in East Boston my whole life, be given an opportunity to work.		
Marvin	Lubin	I am a union apprentice, and I feel that this development being a union one, will produce opportunities for myself, and my fellow apprentices for years to come.		
Zach	DiTocco	As a proud member of Local 4, I believe Suffolk Downs would provide great opportunity for all trades/apprentices. It would help all aspects/communities of the city and bring growth.		
Ajhani	Mchullough Lynch	I'm a union apprentice and I want this project to be available to other union apprentices!		
Kareem	Chaplin	I think Suffolk Downs should employ local residents to build the project at union wage.		
Christopher	Ciarcia	Suffolk Downs should have a PLA in place for our Revere residents. Thank you.		
Richard	Rogers	Suffolk Downs should sign a PLA.		
Thomas	Wau	Suffolk Downs should be built with a Project Labor Agreement.		
Isaac	Ramos	I think going union builds community and pushes the goals towards a better living. More affordable housing too!!		
Eric	Provitolo	Suffolk Downs should protect workers, wages, and residents. It should sign a P.L.A.		
Xiomara	Ramos		Duy oportunidades a personas que no hablan perfecto Ingles porque payumos senta, tuxos biles y tambien que no pongun tuntis barreras. por que el trabajo lo desenpeñamos Igual. yo tengo lisenca de cuidado de nikos. De bactender, cuidado para la sulod pero hay barreras de ingles hay que poner un alto . Gracias.	Por que la vivienda esta muy cara en la ciudad East Boston por que estoy desulajuado por que no podemos comprar casu mos de bujo recurso. Por que ponen y dicen no hables Inglos no te damos el trabajo?
Joseph	Myette	Sign PLA. Hire East Boston Residents.		

First Name	Last Name	Comment	Question	Translation (Spanish)
Milly	Calles sleman		Como nsoluconar los problemas de vivindas- es mucho el costo- oportunidades de trabajo alas personas quenno hablamos Ingles.	How do we solve the housing problems? The cost is too high. We need job opportunities for people that don't speak English.
Levis	Noguera		Darte oportunidades de trabajo a personas que no ablamos ingles que tenemos muchos deseos de salir adelante con nuestra familia queremos que nos ayuden nosotros amamos este paiz	Suffolk Downs should give people opportunities to work for those of us that don't speak Spanish. We wish to further our family and we want help. We love this country.
Dora	Polanco		Señora. Concejal, Lydia Enwards.Ayodenos a quenos den al trabajo del casino por favor. A persona que no ablamos muy bien Ingles. De auteneano gracias.	Ms. Councilor Lydia Edwards, help us get work at the casino please for a person who does not speak English very well. Thanks in advance.
Catalina	Rojos		Escuchar realmente a la comunidad y tener en cuenta sus preguntas, suyerencias y comentarios deberis dor oportunidad de trabajo a las personas de la comunidad, ver viable el trabajo cooperativo en creolcion de cooperotivas.	Suffolk Downs should truly listen to the community and take into consideration the questions, suggestions, and comments. It should give work opportunity to people in the community and see cooperative work as viable in addition to helping the creation of cooperatives.
Ana	Ramirez		Creoque ese desarrollo seria muy bueno para la ciudad. Pero como podemos garantizarque las oportunidades de trabajo seran dadas a los residentes de East Boston y asegurar que no halla. Razis mo por lenguaje o nacionalidad.	I think this development will be great for the city. But how can we guarantee that the job opportunities will be for the residents of East Boston and ensure that there isn't racism based on language or nationality.
Juana	Rivera		Senorita Condejal. Lepido por favor nos ayude a que podamos poder entrar atrouajar al casino grasis.	Ms. Councilor I ask you to please help us get work at the casino. Thanks.
Nerly	Pleitez		seño consejal Lydia Edwards lepido me qyude aconseguir este trauajo en el casino megustaria trabajar gracias ayi.	Ms. Councilor Lydia I ask you to please help us get work at the casino. I'd like to work there. Thanks.
Mike	Cataldo		If Suffolk Downs was to be 100% union before, why change?	
Gina	Ciampa	Suffolk Downs should be available for union job opportunities and create apprentice programs.		
Jason	Chambers	Suffolk Downs should have a PLA with Unions, Affordable Housing that is actually Affordable, and Long Term Investment in surrounding infrastructure.		
Walter	Belmonte	I think Suffolk Downs should use local and union labor.		
James	Coughlin Jr.	Be Union!		

First Name	Last Name	Comment	Question	Translation (Spanish)
Gerald	Pleary III	I would like Suffolk Downs to have Union Jobs and a PLA(Project Labor Agreement) before any work starts.		
Mike	Martin	Suffolk Downs should have union jobs and a Project Labor Agreement.		
Rick	MacKinnon	Suffolk Downs should have a day care and let the owner have 1 year free of rent to get buisnesses up and running.		
Avery	Tango	Suffolk Downs should use all union trades.		
Jonathan	Cimino			
Victor	Beraldo	Suffolk Downs should be 100% Union with a Project Labor Agreement		
Christina	Soberon	Suffolk Downs should go 100% union with a Plublic Labor Agreement!		
Paul	Jevoli			
Frank	Jevoli			
Sabrina	Monziona			
Anthony	Monziona	Suffolk Downs should be a project labor agreement!		
Danny	Lane	Suffolk Downs should be a project labor agreement!		
Kevin	Kirwin	I think Suffolk Downs should sign a Project Labor Agreement		
Meghan	Gradzewiz	Suffolk Downs should sign a project lebor agreement.		
Tyler	Tirone	Suffolk Downs needs to be union agreement and should be closer to the 20% affordable housing PLA		
Jim	Lister	I think Suffolk Downs should protect workers and wages and residents. They should sign a Project Labor Agreement.		

First Name	Last Name	Comment(s)	Question(s)
Mary	Cole	I think Suffolk Downs should: 1. Use permeable paving and walkway surfaces to diminish the "flashiness" of flooding events 2. Provide written guarantee that public open space rights will be same as in city parks (e.g. speech, assembly) 3. Provide multiple dog parks and multiple playgrounds	
Kannan	Thiruvengadan	Create 3-4 page impacts summary	
Magdalena	Ayed		Is all the green areas marked on the site actually <u>green space</u> vs. <u>open space</u> ? I just want to make sure that when renderings are presented it is marked as potential landscape plus actual greenspace.

First Name	Last Name	Comment	Question
Josephine	Matthews	Route 1A should be expanded to accomodate all th enew traffic. The MBTA should be upgraded or work more efficiently. There should be a special roadway for bikers.	
Matt	Walsh	The MBTA should expand their bus route coverage into and around Suffolk Downs. There should also be a way to bike in to and around the area without sharing the street with cars or having to bike next to parked cars.	I am wondering why there is such a discrepancy between the number of parking spots that HYM projects they will need and the number the city requires?
Kristen	Veit	I think Suffolk Downs should extend the Greenway through Beachmont and add additional Blue Bike stations. They should increase the number of buses/public routes throughout the area as people will use public transportation if it is dependable (public and affordable). They should also add addition water transportation, which should, again, be public and affordable. Finallu, there should be no changes to roads that will allow for increased traffic.	
Mary	Cole	Suffolk Downs should make substantial investment in the Blue Line, with better switching, more trains cars that have a high capacity. There should be zip cars or shared car facilities. There is also a need to add fire equipment, a fire station, an ambulance, and schools.	
Amilia	Mimi DiFeo	Suffolk Downs should work with the MBTA Blue Line. There should be water shuttles from Jeffries Point and Maverick. The Fire Department, EMS, and Police Departments all need to be increased.	

First Name	Last Name	Comment	Question
Mike	Freedbenz	I think Suffolk Downs should work diligently with MassDOT to do the following two items: 1. Mitigate ridership impact on blue Line and advocate for an increased number of trains in service 2. Take responsibility for repurposing/redesigning route 1A from Day Sle to Bell Circle. Suffolk Downs should not build with default/cheap frame materials	
Misi	Russo		Can the City facilitate a holistic conversation with MassDOT, Massport, the MBTA, and HYM?
Lisa	Jacobsen	The HYM 1.58 people per 1 unit is ridiculously low. I think Suffolk Downs should extend the Greenway from Constitution Beach - underneath Saratoga street to Revere Beach, through the Suffolk Downs site, and have the quality and maintenance of the existing greenway throughout the new sections. It needs to be separated from the Road and minimize roadway crossings. They should also re-align the Blue line to run through the site to make it a true transit-oriented development. They should dedicate as close to 100% as possible of the transportation dollars to be dedicated to public transit. Parking on-site should be less than 1/2 (one half) space per unit. Polcies should be discourage driving and incentivize walk/bike/transit.	Are MassDot's and MAPC's comments publically available? Are the documents from OPIR public? When will the Master TAPA be drafted? How will HYM Bbe held accountable for implementation of what they commit to doing? What parts of the PDA can be amended after it is approved? How did HYM come up with 1.58 peple per 1 unit?

First Name	Last Name	Comment	Question
John	Walkey	I think Suffolk Downs should make sure that the MBTA's Better Bus Project doesn't end up funneling a lot of Near North Shore Traffic into Blue Line at Wonderland. They should also push the State Police to allow the Silver Line to use the ramp in South Boston into the Ted Willians Tunnel.	Can we (East Boston residents) meet with MAOC/MPO staff (e.g. Eric Bourassa) to talk about Regional impacts on the Project and the regional impacts of the project? Are the MBTA Blue line ridership stats for real?
Zachary	Hollopates	Suffolk Downs should provide shuttle services to major public transportation hubs. We need to help people break th ehabit of single occupancy car use.	
Chris	Marchi	I think Suffolk Downs should partner with Cimmunity, City, and MAPC on an integration traffic management system to 1. reduce neighborhood vehicular speeds and 2. elevate priority for pedestrian movements.	



Tim Czerwienski <tim.czerwienski@boston.gov>

On prioritization of climate migrants

Kannan Thiru

Mon, Apr 8, 2019 at 6:55 PM

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

Hi Tim,

It is becoming increasingly clear that during the Suffolk Downs development period, there will be climate migrants in Boston: population displaced either by increasing flood insurance or increasing flood (whether it is nuisance flood or 1 or 2 nasty storms that expose the vulnerability of the flood zone). How can we take advantage of our current opportunity to **Plan** a **Development Area** (PDA) at this time, to be proactive about making it possible for the flooding-displaced locals to stick around in Boston, if they would like that (which is likely because uprooting and transplanting a family as a whole is clearly a tall order task as is, and is taller order when done in a stressful state of reacting to a crisis)?

How about committing room for micro-units in the plan with priority given to the flooding-displaced? Another way to go about it is to devise an instrument now that allows people (home owners in the flood zone) into a program to reserve a spot to move into when it's ready. This allows for a more proactive approach where they can buy at market rate. Their current home becomes conservation land/part of the resilient harbor. More thinking to do here.



Tim Czerwienski <tim.czerwienski@boston.gov>

Fwd: COMMENTS FOR SUFFOLK DOWNS PUBLIC MEETING

Edith G De Angelis

To: Tim.Czerwienski@boston.gov

Cc:

Mon, May 13, 2019 at 10:00 PM

Sent from my iPad

Begin forwarded message:

From: Edith G De Angelis**Date:** May 13, 2019 at 9:43:24 PM EDT**To:****Subject:** COMMENTS FOR SUFFOLK DOWNS PUBLIC MEETING

MAY 13, 2019

Dear Tim:

I respectfully submit the following recommendations for inclusion into the discussions at the next public meeting, in May.

It has come to my attention that there is a move to name the new streets at Suffolk Downs for prominent Boston, East Boston Women. Obviously, I am complete support of this suggestion. In fact it is more important to identify contemporary East Boston ladies, in order to have living residents of this geographic area recognize the names and the many outstanding contributions made during their life time. Many of the Women listed in the Boston Women's Trail are already honored with beautiful sculptures along Commonwealth Avenue.

Recently, Maria D'Itria, most recent President of the Boston Women's Heritage Trail, completed the research, and along with Mary Cahalane, and Maria's team from the Boston Trail completed REMEMBERING THE WOMEN OF EAST BOSTON.... A Boston Women's Heritage Trail in the Neighborhood of East Boston, Massachusetts. Each person is worth special recognition for their unique contributions to local, and, American History. I will list them by neighborhood. More details may be secured through BostonWomen's Heritage Trail. BWHT.org

1. Annie Frasier Norton
2. [Maverick Street](#) Mothers
3. Dr. Marion Corleto Sabia
4. Harriet Curtis
Margaret Curtis
5. Bridget Murphy Kennedy
Mary Augusta Hickey Kennedy
6. Armenda Gibbs
Isabel Hyams *
7. Eleanor Prentiss Cressy. *
8. Frances E. Brown Rowan. *
9. Caroline "Orrie" Orr *
10. Ethel Rowland Flynn. *
11. Helen Johns Carroll. *
12. Pauline Bromberg. *
13. Albania Martha Boole *

These are the nineteen distinguished East Boston women. There are many others, but unfortunately space is limited. If there is limited space, or streets to be named, I would vote for the ones with a star after their name, as my first preference.

Hopefully, you and the members of the committee will approve naming the new streets at Suffolk Downs named after all of the nineteen special women, or at least, those with stars by their name.

Please keep us informed with the process, and, final decisions.

You may reach me at: or

Thank you.

Sincerely yours,

Edith G. De Angelis

Sent from my iPad



Tim Czerwienski <tim.czerwienski@boston.gov>

Fwd: Suffolk Downs: Give us time to protect the common good

Colin Donnelly <colin.donnelly@boston.gov>
To: Tim Czerwienski <tim.czerwienski@boston.gov>

Mon, May 20, 2019 at 8:52 AM

**Colin T. Donnelly***Special Assistant to the Director*

617.918.4204 (o)

Boston Planning & Development Agency (BPDA)

One City Hall Square, 9th Floor | Boston, MA 02201

bostonplans.org

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

From: **Nadav David** <campaigns@good.do>

Date: Mon, May 20, 2019 at 8:39 AM

Subject: Suffolk Downs: Give us time to protect the common good

To: <mayor@cityofboston.gov>

Cc: <Brian.golden@boston.gov>, <lydia.edwards@boston.gov>, <adrian.madaro@mahouse.gov>

Dear Mayor Walsh, Tom O'Brien, Brian Golden, and elected representatives,

I'm deeply concerned about the rushed process around one of Boston's largest development proposals. The 10,000 new units of housing proposed by HYM Investment Group for the former race track would, in essence, add an entire new neighborhood to our city. Its impact would be acutely felt in the predominantly working class immigrant neighborhood of East Boston. I'm asking you urgently to do the following:

1. Mayor Walsh: Slow down the process! Work with housing advocates and residents to address our concerns.
2. Mayor Walsh and Tom O'Brien: The project needs to have real affordability. The Boston People's Assembly (a citywide gathering of residents creating a People's Plan for Boston) demands that all new development must have at least 50% affordability for families. We agree! Suffolk Downs should have 50% affordability for families at 25% of Area Median Income.
3. Mayor Walsh and Tom O'Brien: Work with housing justice advocates and residents on creating a displacement mitigation plan that will keep East Boston families in our homes. In another part of the city, the Fairmount Corridor, the mayor pledged to protect the housing of all residents at risk of displacement. You both have a responsibility to protect all Eastie families.
4. Mayor Walsh and Tom O'Brien: Ensure that weather-resistant green spaces like the parks, bike lanes, and outdoor theater are publicly visible and accessible for all neighborhood residents to use.

We stand in solidarity with other groups calling for protections from climate change and a much stronger transportation plan.

In order for the BPDA to approve a PDA, it has to find that on balance it's in the public welfare, however the current proposal doesn't support such a finding; to the contrary the project would do the opposite, fueling displacement in an already overheated housing market without providing anywhere near enough new affordable homes.

Thank you,

Nadav David
Boston, Massachusetts, 02130, United States

This email was sent by Nadav David via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol FC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Nadav provided an email address which we included in the REPLY-TO field.

Please reply to Nadav David at

To learn more about Do Gooder visit www.dogooder.co

To learn more about web protocol FC 3834 visit: www.rfc-base.org/rfc-3834.html



Tim Czerwienski <tim.czerwienski@boston.gov>

Fwd: Suffolk Downs: Give us time to protect the common good

Colin Donnelly <colin.donnelly@boston.gov>
To: Tim Czerwienski <tim.czerwienski@boston.gov>

Mon, May 20, 2019 at 8:53 AM

**Colin T. Donnelly***Special Assistant to the Director*

617.918.4204 (o)

Boston Planning & Development Agency (BPDA)

One City Hall Square, 9th Floor | Boston, MA 02201

bostonplans.org

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

From: **Seleeke Flingai** <campaigns@good.do>

Date: Mon, May 20, 2019 at 8:51 AM

Subject: Suffolk Downs: Give us time to protect the common good

To: <mayor@cityofboston.gov>

Cc: <Brian.golden@boston.gov>, <lydia.edwards@boston.gov>, <adrian.madaro@mahouse.gov>

Dear Mayor Walsh, Tom O'Brien, Brian Golden, and elected representatives,

I'm deeply concerned about the rushed process around one of Boston's largest development proposals. The 10,000 new units of housing proposed by HYM Investment Group for the former race track would, in essence, add an entire new neighborhood to our city. Its impact would be acutely felt in the predominantly working class immigrant neighborhood of East Boston. I'm asking you urgently to do the following:

1. Mayor Walsh: Slow down the process! Work with housing advocates and residents to address our concerns.
2. Mayor Walsh and Tom O'Brien: The project needs to have real affordability. The Boston People's Assembly (a citywide gathering of residents creating a People's Plan for Boston) demands that all new development must have at least 50% affordability for families. We agree! Suffolk Downs should have 50% affordability for families at 25% of Area Median Income.
3. Mayor Walsh and Tom O'Brien: Work with housing justice advocates and residents on creating a displacement mitigation plan that will keep East Boston families in our homes. In another part of the city, the Fairmount Corridor, the mayor pledged to protect the housing of all residents at risk of displacement. You both have a responsibility to protect all Eastie families.
4. Mayor Walsh and Tom O'Brien: Ensure that weather-resistant green spaces like the parks, bike lanes, and outdoor theater are publicly visible and accessible for all neighborhood residents to use.

We stand in solidarity with other groups calling for protections from climate change and a much stronger transportation plan.

In order for the BPDA to approve a PDA, it has to find that on balance it's in the public welfare, however the current proposal doesn't support such a finding; to the contrary the project would do the opposite, fueling displacement in an already overheated housing market without providing anywhere near enough new affordable homes.

Yours sincerely,

Seleeke Flingai
Boston, Massachusetts, 02134, United States

This email was sent by Seleeke Flingai via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol FC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Seleeke provided an email address which we included in the REPLY-TO field.

Please reply to Seleeke Flingai at

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To learn more about web protocol FC 3834 visit: www.rfc-base.org/rfc-3834.html



Tim Czerwienski <tim.czerwienski@boston.gov>

Fwd: Suffolk Downs: Give us time to protect the common good

Colin Donnelly <colin.donnelly@boston.gov>
 To: Tim Czerwienski <tim.czerwienski@boston.gov>

Mon, May 20, 2019 at 8:53 AM



Colin T. Donnelly

Special Assistant to the Director

617.918.4204 (o)

Boston Planning & Development Agency (BPDA)

One City Hall Square, 9th Floor | Boston, MA 02201

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

From: **Samara Grossman** <campaigns@good.do>

Date: Mon, May 20, 2019 at 6:42 AM

Subject: Suffolk Downs: Give us time to protect the common good

To: <mayor@cityofboston.gov>

Cc: <Brian.golden@boston.gov>, <lydia.edwards@boston.gov>, <adrian.madaro@mahouse.gov>

Dear Mayor Walsh, Tom O'Brien, Brian Golden, and elected representatives,

I'm deeply concerned about gentrification all over Boston. The 10,000 new units of housing proposed by HYM Investment Group for the Suffolk Downs former race track would, in essence, add an entire new neighborhood to our city. Its impact would be acutely felt in the predominantly working class immigrant neighborhood of East Boston. I'm asking you urgently to do the following:

1. Mayor Walsh: Slow down the process! Work with housing advocates and residents to address our concerns. Listen to them!!!
2. Mayor Walsh and Tom O'Brien: The project needs to have real affordability. The Boston People's Assembly (a citywide gathering of residents creating a People's Plan for Boston) demands that all new development must have at least 50% affordability for families. We agree! Suffolk Downs should have 50% affordability for families at 25% of Area Median Income. People's lives and livelihood are at stake.
3. Mayor Walsh and Tom O'Brien: Work with housing justice advocates and residents on creating a displacement mitigation plan that will keep East Boston families in our homes. In another part of the city, the Fairmount Corridor, the mayor pledged to protect the housing of all residents at risk of displacement. You both have a responsibility to protect all Eastie families.
4. Mayor Walsh and Tom O'Brien: Ensure that weather-resistant green spaces like the parks, bike lanes, and outdoor theater are publicly visible and accessible for all neighborhood residents to use. Everyone needs beauty, not just the rich.

We stand in solidarity with other groups calling for protections from climate change and a much stronger transportation plan.

In order for the BPDA to approve a PDA, it has to find that on balance it's in the public welfare, however the current proposal doesn't support such a finding; to the contrary the project would do the opposite, fueling displacement in an already overheated housing market without providing anywhere near enough new affordable homes.

Yours sincerely,
Samara Grossman
Boston, Massachusetts, 02130, United States

This email was sent by Samara Grossman via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol FC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Samara provided an email address which we included in the REPLY-TO field.

Please reply to Samara Grossman at

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To learn more about web protocol FC 3834 visit: www.rfc-base.org/rfc-3834.html



Tim Czerwienski <tim.czerwienski@boston.gov>

Fwd: Suffolk Downs: Workforce Housing Now

Colin Donnelly <colin.donnelly@boston.gov>
To: Tim Czerwienski <tim.czerwienski@boston.gov>

Mon, May 20, 2019 at 8:52 AM

**Colin T. Donnelly***Special Assistant to the Director*

617.918.4204 (o)

Boston Planning & Development Agency (BPDA)

One City Hall Square, 9th Floor | Boston, MA 02201

bostonplans.org

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

From: **James Ikeda** <campaigns@good.do>

Date: Mon, May 20, 2019 at 8:10 AM

Subject: Suffolk Downs: Workforce Housing Now

To: <mayor@cityofboston.gov>

Cc: <Brian.golden@boston.gov>, <lydia.edwards@boston.gov>, <adrian.madaro@mahouse.gov>

Dear Mayor Walsh & Tom O'Brien

A few months ago two of my friends in East Boston were booted out of their place because the landlord raised the rent \$700 all at once in an attempt to empty the building so it could be sold for redevelopment.

Everyone I know in East Boston has experienced something like this or knows someone who has; they all live in fear of the instability that such actions bring about for people who aren't rich.

Housing cannot be thought of merely as an investment for developers. We need a serious workforce housing plan and that requires commitment to city residents over profit.

I'm asking you urgently to do the following:

1. Mayor Walsh: Slow down the process! Work with housing advocates and residents to address our concerns.
2. Mayor Walsh and Tom O'Brien: The project needs to have real affordability. The Boston People's Assembly (a citywide gathering of residents creating a People's Plan for Boston) demands that all new development must have at least 50% affordability for families. We agree! Suffolk Downs should have 50% affordability for families at 25% of Area Median Income.
3. Mayor Walsh and Tom O'Brien: Work with housing justice advocates and residents on creating a displacement mitigation plan that will keep East Boston families in our homes. In another part of the city, the Fairmount Corridor, the mayor pledged to protect the housing of all residents at risk of displacement. You both have a responsibility to protect all Eastie families.
4. Mayor Walsh and Tom O'Brien: Ensure that weather-resistant green spaces like the parks, bike lanes, and outdoor theater are publicly visible and accessible for all neighborhood residents to use.

We stand in solidarity with other groups calling for protections from climate change and a much stronger transportation plan.

In order for the BPDA to approve a PDA, it has to find that on balance it's in the public welfare, however the current proposal doesn't support such a finding; to the contrary the project would do the opposite, fueling displacement in an already overheated housing market without providing anywhere near enough new affordable homes.

Yours sincerely,
James Ikeda

This email was sent by James Ikeda via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol FC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however James provided an email address which we included in the REPLY-TO field.

Please reply to James Ikeda at

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Tim Czerwienski <tim.czerwienski@boston.gov>

Fwd: Suffolk Downs: Slow down this project to make sure it serves the public interest!

Colin Donnelly <colin.donnelly@boston.gov>
To: Tim Czerwienski <tim.czerwienski@boston.gov>

Tue, May 21, 2019 at 9:14 AM



Colin T. Donnelly

Special Assistant to the Director

617.918.4204 (o)

Boston Planning & Development Agency (BPDA)

One City Hall Square, 9th Floor | Boston, MA 02201

bostonplans.org

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

From: **Kevin Murray** <campaigns@good.do>

Date: Tue, May 21, 2019 at 3:14 AM

Subject: Suffolk Downs: Slow down this project to make sure it serves the public interest!

To: <mayor@cityofboston.gov>

Cc: <Brian.golden@boston.gov>, <lydia.edwards@boston.gov>, <adrian.madaro@mahouse.gov>

Dear Mayor Walsh, Tom O'Brien, Brian Golden, and elected representatives,

I'm deeply concerned about the rushed process around one of Boston's largest development proposals. The 10,000 new units of housing proposed by HYM Investment Group for the former race track would, in essence, add a new neighborhood to our city. Its impact would be most pronounced in the predominantly working-class immigrant neighborhood of East Boston. I'm asking you urgently to do the following:

1. Mayor Walsh: Slow down the process! Work with housing advocates and residents to address our concerns.
2. Mayor Walsh and Tom O'Brien: The project needs to have real affordability. The Boston People's Assembly (a citywide gathering of residents creating a People's Plan for Boston) demands that all new development must have at least 50% affordability for families. We believe that Suffolk Downs should have 50% affordability for families at 25% of Area Median Income. That would be a significant increase in the availability of affordable housing in the area and would do a lot to alleviate displacement pressures in East Boston and the surrounding area.
3. Mayor Walsh and Tom O'Brien: Work with housing justice advocates and residents on creating a displacement mitigation plan that will keep East Boston families in their homes. In another part of the city, the Fairmount Corridor, the mayor pledged to protect the housing of all residents at risk of displacement. You both have a responsibility to provide the same protection to East Boston families.
4. Mayor Walsh and Tom O'Brien: Ensure that weather-resistant green spaces like the parks, bike lanes, and outdoor theater are publicly visible and accessible to all neighborhood residents to use.

We stand in solidarity with other groups calling for protection from climate change to be built into any development at Suffolk Downs and that the project's transportation plan be strengthened.

In order for the BPDA to approve a PDA, it has to find that on balance, the project is in the public welfare. The current proposal for Suffolk Downs doesn't support such a finding; to the contrary, the project would harm the public interest, fueling displacement in an already overheated housing market without providing anything approaching an adequate

supply of new affordable housing.

Yours sincerely,
Kevin Murray
Roslindale, Massachusetts, 02131, United States

This email was sent by Kevin Murray via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol FC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Kevin provided an email address which we included in the REPLY-TO field.

Please reply to Kevin Murray at .

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Tim Czerwienski <tim.czerwienski@boston.gov>

Fwd: Suffolk Downs will cause displacement - work with residents to improve the plan

Colin Donnelly <colin.donnelly@boston.gov>
To: Tim Czerwienski <tim.czerwienski@boston.gov>

Tue, May 21, 2019 at 9:14 AM

**Colin T. Donnelly***Special Assistant to the Director*

617.918.4204 (o)

Boston Planning & Development Agency (BPDA)

One City Hall Square, 9th Floor | Boston, MA 02201

bostonplans.org

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

From: **Lisa Owens** <campaigns@good.do>

Date: Tue, May 21, 2019 at 4:21 AM

Subject: Suffolk Downs will cause displacement - work with residents to improve the plan

To: <mayor@cityofboston.gov>

Cc: <Brian.golden@boston.gov>, <lydia.edwards@boston.gov>, <adrian.madaro@mahouse.gov>

Dear Mayor Walsh, Tom O'Brien, Brian Golden, and elected representatives,

The Suffolk Downs project, as it stands now, will be the cause of hundreds, if not thousands, of working class families being displaced from our city.

As an East Boston resident, I am all too aware of how unsustainably high the rents are. The luxury development along the waterfront has already created so much upward pressure on our rents. The Suffolk Downs project will be the tipping point for people like me. This is unacceptable. This project does not yet serve the public welfare. We must act now.

Mayor Walsh, as our Mayor, I urge you to:

Slow down the process! Set up a task force charged with working with housing advocates and residents to address our concerns about displacement.

Mayor Walsh and Tom O'Brien:

Increase the affordability in this development project. Suffolk Downs should cater to working class people, and not just high income residents. This project needs to have 50% of its units, approximately 5,000 residential units, affordable for families at an average of 25% of Area Median Income.

Work with housing justice advocates and residents to create a displacement mitigation plan that will keep East Boston families in our homes.

Protect Eastie families. Mayor Walsh pledged to protect the housing of all residents at risk of displacement in the Fairmount Corridor. Eastie families deserve the same pledge.

In addition, ensure that weather-resistant green spaces like the parks, bike lanes, and outdoor theater are publicly visible and accessible for all neighborhood residents to use.

To reiterate, do not allow this plan to move forward without addressing the concerns here, which are echoed by residents and grassroots neighborhood groups who work every day to make this city great.

Thank you.

This email was sent by Lisa Owens via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol FC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Lisa provided an email address which we included in the REPLY-TO field.

Please reply to Lisa Owens at

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Tim Czerwienski <tim.czerwienski@boston.gov>

Fwd: Suffolk Downs: Give us time to protect the common good

Colin Donnelly <colin.donnelly@boston.gov>
To: Tim Czerwienski <tim.czerwienski@boston.gov>

Mon, May 20, 2019 at 8:52 AM

**Colin T. Donnelly***Special Assistant to the Director*

617.918.4204 (o)

Boston Planning & Development Agency (BPDA)

One City Hall Square, 9th Floor | Boston, MA 02201

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

From: **Lily Ann Ritter** <campaigns@good.do>

Date: Mon, May 20, 2019 at 8:11 AM

Subject: Suffolk Downs: Give us time to protect the common good

To: <mayor@cityofboston.gov>

Cc: <Brian.golden@boston.gov>, <lydia.edwards@boston.gov>, <adrian.madaro@mahouse.gov>

Dear Mayor Walsh, Tom O'Brien, Brian Golden, and elected representatives,

I'm deeply concerned about the rushed process around one of Boston's largest development proposals. The 10,000 new units of housing proposed by HYM Investment Group for the former race track would, in essence, add an entire new neighborhood to our city. Its impact would be acutely felt in the predominantly working class immigrant neighborhood of East Boston and would threaten to violate fair housing principles. I'm asking you urgently to do the following:

1. Mayor Walsh: Slow down the process! Work with housing advocates and residents to address our concerns.
2. Mayor Walsh and Tom O'Brien: The project needs to have real affordability. The Boston People's Assembly (a citywide gathering of residents creating a People's Plan for Boston) demands that all new development must have at least 50% affordability for families. We agree! Suffolk Downs should have 50% affordability for families at 25% of Area Median Income.
3. Mayor Walsh and Tom O'Brien: Work with housing justice advocates and residents on creating a displacement mitigation plan that will keep East Boston families in our homes. In another part of the city, the Fairmount Corridor, the mayor pledged to protect the housing of all residents at risk of displacement. You both have a responsibility to protect all Eastie families.
4. Mayor Walsh and Tom O'Brien: Ensure that weather-resistant green spaces like the parks, bike lanes, and outdoor theater are publicly visible and accessible for all neighborhood residents to use.

We stand in solidarity with other groups calling for protections from climate change and a much stronger transportation plan.

In order for the BPDA to approve a PDA, it has to find that on balance it's in the public welfare, however the current proposal doesn't support such a finding; to the contrary the project would do the opposite, fueling displacement in an already overheated housing market without providing anywhere near enough new affordable homes.

Yours sincerely,

Lily Ann Ritter
Boston, Massachusetts, 02116, United States

This email was sent by Lily Ann Ritter via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol FC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Lily Ann provided an email address which we included in the REPLY-TO field.

Please reply to Lily Ann Ritter at

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Tim Czerwienski <tim.czerwienski@boston.gov>

Fwd: Suffolk Downs: Give us time to protect the common good

Colin Donnelly <colin.donnelly@boston.gov>
To: Tim Czerwienski <tim.czerwienski@boston.gov>

Mon, May 20, 2019 at 8:52 AM

**Colin T. Donnelly***Special Assistant to the Director*

617.918.4204 (o)

Boston Planning & Development Agency (BPDA)

One City Hall Square, 9th Floor | Boston, MA 02201

bostonplans.org

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

From: **Juan Vargas** <campaigns@good.do>

Date: Mon, May 20, 2019 at 7:56 AM

Subject: Suffolk Downs: Give us time to protect the common good

To: <mayor@cityofboston.gov>

Cc: <Brian.golden@boston.gov>, <lydia.edwards@boston.gov>, <adrian.madaro@mahouse.gov>

Dear Mayor Walsh, Tom O'Brien, Brian Golden, and elected representatives,

I'm deeply concerned about the rushed process around one of Boston's largest development proposals. The 10,000 new units of housing proposed by HYM Investment Group for the former race track would, in essence, add an entire new neighborhood to our city. Its impact would be acutely felt in the predominantly working class immigrant neighborhood of East Boston. I'm asking you urgently to do the following:

1. Mayor Walsh: Slow down the process! Work with housing advocates and residents to address our concerns.
2. Mayor Walsh and Tom O'Brien: The project needs to have real affordability. The Boston People's Assembly (a citywide gathering of residents creating a People's Plan for Boston) demands that all new development must have at least 50% affordability for families. We agree! Suffolk Downs should have 50% affordability for families at 25% of Area Median Income.
3. Mayor Walsh and Tom O'Brien: Work with housing justice advocates and residents on creating a displacement mitigation plan that will keep East Boston families in our homes. In another part of the city, the Fairmount Corridor, the mayor pledged to protect the housing of all residents at risk of displacement. You both have a responsibility to protect all Eastie families.
4. Mayor Walsh and Tom O'Brien: Ensure that weather-resistant green spaces like the parks, bike lanes, and outdoor theater are publicly visible and accessible for all neighborhood residents to use.

We stand in solidarity with other groups calling for protections from climate change and a much stronger transportation plan.

In order for the BPDA to approve a PDA, it has to find that on balance it's in the public welfare, however the current proposal doesn't support such a finding; to the contrary the project would do the opposite, fueling displacement in an already overheated housing market without providing anywhere near enough new affordable homes.

Thank you in advance, im sure this will be taken into consideration and given the attention it needs.

Yours sincerely,
Juan Vargas
Boston, Massachusetts, 02122, United States

This email was sent by Juan Vargas via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol FC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Juan provided an email address which we included in the REPLY-TO field.

Please reply to Juan Vargas at

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To learn more about web protocol FC 3834 visit: www.rfc-base.org/rfc-3834.html



Tim Czerwienski <tim.czerwienski@boston.gov>

Fwd: Suffolk Downs: Development without displacement

Colin Donnelly <colin.donnelly@boston.gov>
To: Tim Czerwienski <tim.czerwienski@boston.gov>

Tue, May 21, 2019 at 9:15 AM

**Colin T. Donnelly***Special Assistant to the Director*

617.918.4204 (o)

Boston Planning & Development Agency (BPDA)

One City Hall Square, 9th Floor | Boston, MA 02201

bostonplans.org

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

From: **Karen Wheeler** <campaigns@good.do>

Date: Tue, May 21, 2019 at 7:56 AM

Subject: Suffolk Downs: Development without displacement

To: <mayor@cityofboston.gov>

Cc: <Brian.golden@boston.gov>, <lydia.edwards@boston.gov>, <adrian.madaro@mahouse.gov>

Dear Mayor Walsh, Tom O'Brien, Brian Golden, and elected representatives,

As Boston becomes an even more wonderful place to live, and opportunities for economic development and growth emerge, the City faces many decisions. One of them is who is this development for! Increasingly, it doesn't feel like it's for people like me - those of us who live here already. I'm deeply concerned about the rushed process around one of Boston's largest development proposals. The 10,000 new units of housing proposed by HYM Investment Group for the former race track would, in essence, add an entire new neighborhood to our city. It's impact would be acutely felt in the predominantly working class immigrant neighborhood of East Boston. I'm asking you urgently to do the following:

1. Mayor Walsh: Slow down the process! Work with housing advocates and residents to address our concerns.
2. Mayor Walsh and Tom O'Brien: The project needs to have real affordability. The Boston People's Assembly (a citywide gathering of residents creating a People's Plan for Boston) demands that all new development must have at least 50% affordability for families. We agree! Suffolk Downs should have 50% affordability for families at 25% of Area Median Income.
3. Mayor Walsh and Tom O'Brien: Work with housing justice advocates and residents on creating a displacement mitigation plan that will keep East Boston families in our homes. In another part of the city, the Fairmount Corridor, the mayor pledged to protect the housing of all residents at risk of displacement. You both have a responsibility to protect all Eastie families.
4. Mayor Walsh and Tom O'Brien: Ensure that weather-resistant green spaces like the parks, bike lanes, and outdoor theater are publicly visible and accessible for all neighborhood residents to use.

We stand in solidarity with other groups calling for protections from climate change and a much stronger transportation plan.

In order for the BPDA to approve a PDA, it has to find that on balance it's in the public welfare, however the current proposal doesn't support such a finding; to the contrary the project would do the opposite, fueling displacement in an already overheated housing market without providing anywhere near enough new affordable homes.

Yours sincerely,
Karen Wheeler

This email was sent by Karen Wheeler via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol FC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Karen provided an email address) which we included in the REPLY-TO field.

Please reply to Karen Wheeler at .

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To learn more about web protocol FC 3834 visit: www.rfc-base.org/rfc-3834.html

IDA

Creo que Suffolk Downs debería/no debería...

I think that the Suffolk Down project should(n't)

reflect the current economic standard
in E. Boston now

SO, 30% of AMI - 70% of new units
50% of AMI - 30% of new units
70% of AMI - 10% of new units

Nombre/name: _____

Richard Monto

Dirección/
address: _____

26 Boynton St - JP - 02130

Numero de teléfono/correo electrónico/ Phone #/
email: _____

Creo que Suffolk Downs debería/no debería...

I think that the Suffolk Down project should(n't)

build a new elementary and high schools

provide jobs for local residents

during construction and after construction

- more open space -

- think about the environment

Nombre/name: _____

Dirección/
address: _____

Numero de teléfono/correo electrónico/ Phone #/
email: _____

Tengo una pregunta...

I have a question

- How do they know they can fill 10,000 new units?
- What is the impact of new units on current East Boston units
- How many condos / apts

Nombre\name: _____

Dirección\
address: _____

Numero de teléfono/correo electrónico/ Phone #/
email: _____

Tengo una pregunta...

Nombre\name: _____

Dirección\
address: _____

Numero de teléfono/correo electrónico/ Phone #/
email: _____

Dear

My name is Jose Nuñez. I am a owner (renter or owner) and I have lived in Lynn for 3 years. I am opposed to the HYM Suffolk Down project because

Mi nombre es Jose Nuñez. Soy un(a) owner inquilino(a) / dueño(a) y he vivido en Lynn por 3 años. Estoy opuesto(a) al proyecto HYM en Suffolk Downs porque

Examples / Ejemplos:

1. The high rents in the 10,000 new units will raise rents in my neighborhood even higher than they are now, and working people won't be able to afford to live in Boston anymore. This project will displace my family and the people of my neighborhood.

Las rentas altas en estas 10,000 nuevas unidades van a incrementar las rentas en mi vecindario más alto de lo que están ahora, y la gente trabajadora no podrá vivir en Boston mas. Este proyecto desplazaría mi familia y las personas de mi vecindario.

2. My children go to school here. If I am displaced because of increasing rents, my children will lose access to their school and resources in the neighborhood.

Mis hijos estudian aquí. Si yo soy desplazado por estas caras rentas mis hijos perderán el acceso a sus escuelas y los recursos de su vecindario.

3. I rely on my neighborhood health center for medical care. If I am displaced, I will lose access to my medical providers and all of the resources I rely on.

Yo dependo de mi clínica de salud para mi cuidado médico. Si soy desplazado voy a perder mi acceso a mis proveedores médicos y todos los recursos en los que dependo.

4. I believe that the city should not create another Seaport. This project will create another luxury city at a time when working families have no housing options. This is morally wrong.

No creo que la ciudad debe construir otro Seaport. Este proyecto creará otra ciudad de lujo en un momento donde familias trabajadoras no tienen opciones de vivienda. Esto es moralmente incorrecto.

5. I believe that streets, sidewalks and parks should be public and not privately owned. The city should be owned by all of the people, not just the rich.

Yo creo que las calles, los andenes, y los parques deben ser públicos y no privados. La ciudad debe ser propiedad de todo el pueblo no solo los ricos.

Instead of more luxury housing and private streets, my community really needs

Envés De más vivienda de lujo y calles privadas, lo que mi comunidad de verdad necesita es

Examples / Ejemplos

1. *Housing that current residents can afford /
Viviende que residentes actuales puedan pagar.*
2. *More investment in schools /
Invertir más en las escuelas*
3. *Resources for youth /
Recursos para los jóvenes*

This project is unacceptable. HYM needs to redesign this project so that it meets the needs of the community.

Sincerely,

Dear

My name is Jose Velazquez I am a Renter (renter or owner) and I have lived in 308 meridian for 14 years. I am opposed to the HYM Suffolk Down project because

Mi nombre es _____. Soy un(a) _____ inquilino(a) / dueño(a) y he vivido en _____ por _____ años. Estoy opuesto(a) al proyecto HYM en Suffolk Downs porque

Examples / Ejemplos:

1. The high rents in the 10,000 new units will raise rents in my neighborhood even higher than they are now, and working people won't be able to afford to live in Boston anymore. This project will displace my family and the people of my neighborhood.

Las rentas altas en estas 10,000 nuevas unidades van a incrementar las rentas en mi vecindario más alto de lo que están ahora, y la gente trabajadora no podrá vivir en Boston mas. Este proyecto desplazaría mi familia y las personas de mi vecindario.

2. My children go to school here. If I am displaced because of increasing rents, my children will lose access to their school and resources in the neighborhood.

Mis hijos estudian aquí. Si yo soy desplazado por estas caras rentas mis hijos perderán el acceso a sus escuelas y los recursos de su vecindario.

3. I rely on my neighborhood health center for medical care. If I am displaced, I will lose access to my medical providers and all of the resources I rely on.

Yo dependo de mi clínica de salud para mi cuidado médico. Si soy desplazado voy a perder mi acceso a mis proveedores médicos y todos los recursos en los que dependo.

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Instead of more luxury housing and private streets, my community really needs

Envés De más vivienda de lujo y calles privadas, lo que mi comunidad de verdad necesita es

Examples / Ejemplos

1. *Housing that current residents can afford /
Vivienda que residentes actuales puedan pagar.*
2. *More investment in schools /
Invertir más en las escuelas*
3. *Resources for youth /
Recursos para los jóvenes*

This project is unacceptable. HYM needs to redesign this project so that it meets the needs of the community.

Sincerely,

My Nombre es Diana Cifuentes

Soy una Inglesa de East Boston y he vivido

Aquí por más de 14 años, y tengo mis hijos y mi

Familia, y no conozco otro lugar de East Boston

Por lo cual no estoy apoyando, estoy en desacuerdo

con el proyecto H+M en Suffolk Downs porque

① Mis hijos nacieron y estudian Aquí, y si somos
desplazados, por las rentas caras, perdieron sus Escuelas

② Las Rentas son Altas, van Incrementar, las Rentas
en mi vecindario, mas alto que estan ahora, y la comunidad
trabajadora, que tienen un Saldo minimo, madres solteras
ya no podran vivir mas en East Boston, habria
desplazamientos y desigualdad.

③ tambien, los parques deben ser Publicos, la ciudad
debe ser propiedad de todo el pueblo, no solo para
los Ricos

④ Este proyecto trae, discriminación
Racismo, y desigualdad, para la comunidad
de bajos Ingresos

AD

PREGUNTAS

por que mejor poner construir

Escuelas, Parques. vivienda Peo Precios

Accesibles. para la comunidad. trabajadores

de bajo Recursos

El: madres cabeza de hogar.

Adultos mayores

PREGUNTA / QUESTIONS:

porque no se han pensado en nuestra
comunidad (inmigrantes) en nuestros
ancianos. Necesitamos ver estar
accesible para todos, para personas
de bajo recursos, inmigrantes
ancianos, madre soltera, etc

COMENTARIO / COMMENT:

Necesitamos que la ciudad nos
apoye, porque no pensar en las
personas familias mas necesitadas.

1. The first part of the document is a list of the names of the members of the committee who have been appointed to the various sub-committees.

2. The second part of the document is a list of the names of the members of the committee who have been appointed to the various sub-committees.

3. The third part of the document is a list of the names of the members of the committee who have been appointed to the various sub-committees.

4. The fourth part of the document is a list of the names of the members of the committee who have been appointed to the various sub-committees.

5. The fifth part of the document is a list of the names of the members of the committee who have been appointed to the various sub-committees.

6. The sixth part of the document is a list of the names of the members of the committee who have been appointed to the various sub-committees.

7. The seventh part of the document is a list of the names of the members of the committee who have been appointed to the various sub-committees.

8. The eighth part of the document is a list of the names of the members of the committee who have been appointed to the various sub-committees.

9. The ninth part of the document is a list of the names of the members of the committee who have been appointed to the various sub-committees.

10. The tenth part of the document is a list of the names of the members of the committee who have been appointed to the various sub-committees.

11. The eleventh part of the document is a list of the names of the members of the committee who have been appointed to the various sub-committees.

12. The twelfth part of the document is a list of the names of the members of the committee who have been appointed to the various sub-committees.

I believe that the project

needs to be more than 13%.

The reason is other town the affordability ^{le}
is over 20%. There is know reason

why it can be more than 20%.

I hear the reason why construction
cost, but I believe it is the

bottom line profit. I thing people
should be first before profit. The

HUD AMI ~~is~~ is not reality in
the are you are developing. The

~~Income~~ ~~from~~ ~~that~~ The average

Income in this community is

most likely \$50,000 or lower

not even close to \$100,000 a year.

and these families should ~~be~~ only

pay 30% of the income toward rent.

People need to be first not profit.

Housing is a human right.

Do not let the Developer
be the Zoner.

COMENTARIO / COMMENT:

mi nombre es, ana Ramirez
Tengo viviendo en East Boston por
23 años yo rento y tengo
2 hijos menores de edad

PREGUNTA / QUESTIONS:

Como puede afectar me esta
desarrollo por estar en un nivel
bajo de ingresos?

Como puedo calificar para
un apartamento accesible para mi
y mis hijos?

PREGUNTA / QUESTIONS:

me gustaria saber si en las
viviendas accesibles ha a ber
un minimo porcentaje para
calificar con mis ingresos?

COMENTARIO / COMMENT:

Si ha a ber alguna escuela
en este desarrollo?

Si ha a ber programas
comunitarios Tales como
programas educativos y
despues de escuelas?

Me llamo Felipa Ortiz. Yo soy inquilina y vivo en 200 de la calle de Maverick, yo vivo aquí por 12 años. Estoy opuesta al proyecto HUM en Suffolk Downs porque ando en riesgo del desalojo y este proyecto no es accesible a mi ingreso anual. Yo no trabajo y vivo con mi hija que gana por el 30% de AMI. Yo quiero que las viviendas accesibles reflejen las necesidades de nuestra comunidad de bajo ingreso.

También quiero que el desarrollo tenga más de 13% de viviendas accesibles por los que ganan menos del 70% AMI.

Quiero parques públicos y otra cancha de fútbol para los jóvenes. No quiero que estos parques anden escondidos dentro del desarrollo, quiero que los parques sean visibles.

y accesibles para todos.

East Boston

Gerardo Chacón

COMENTARIO / COMMENT:

Este proyecto nos traería grandes problemas a la Comunidad ejem:

1. Separación de familias, división comunidad, o sea que las personas que adquirieran éstos proyectos, pueda existir una discriminación, personas que se creen superiores a otras, podría pasar muchos problemas como una vida en mala posición a parte de la que ya tenemos con los desalojos y aumentos de renta

PREGUNTA / QUESTIONS:

¿Porque si el pueblo o sea la Comunidad que se pagan tantos impuestos etc.: que esto que nosotros generamos, ponen grandes inversionistas a asumir sus grandes inversiones porque a ellos les beneficia cualquier manera a la ciudad del cual nosotros ^{no} nos beneficiamos. si no ellos.

PREGUNTA / QUESTIONS:

COMENTARIO / COMMENT:

Nos gustaría que los políticos tengan más conciencia y razonen que ~~est~~ que nos asfixiando con tanto problema sobre vivienda, nosotros alzamos la voz y estamos conscientes que solo uniéndonos veremos de que forma podríamos enfrentarnos a estos problemas.

Mi nombre es Victoria Velásquez
vivo en REVERE y me están sacando de
mecan y la renta desde así
12 años y pago, 1800 dolares y el
Dueño quisio que le pagaran
300 mil dolares y por eso es que
andó aquí me están ayudando
y espero que así todo termino
que acé por el Dueño no le
importo si usted puede
espero que todos nos unamos
a apoyarlos para que la renta
no suba y podamos vivir en
esta comunidad y no me
quiere el por que yo tengo
19 años de vivir aquí no me
cuento como para ir a otra
ciudad a esperar de sero
por eso cuando peleamos
ganamos a la mejor
Victoria Velásquez

con el proyecto de sueldos
mínimos total mente en contra
tienen que acir bñbiendo de
bajo precio que uno pueda
rentar para sus hijos en
el futuro

Tengo una pregunta...

I have a question

what average household size will be considered? 1.5 people per household is not realistic, and genuinely discriminatory towards people of color who tend to have larger families. Units should be built based on a more representative average household size.

Nombre\name: Alex Zuluaga

Dirección\ address: 53 Bayswater St. #3 East Boston

Numero de teléfono/correo electrónico/ Phone #/
email: _____

Tengo una pregunta...

What will rents be for commercial areas? There should be parameters of affordability applied to commercial spaces, so bodegas and entrepreneurs from the East Boston Community can be represented.

Nombre\name: Alex Zuluaga

Dirección\ address: 53 Bayswater St. #3 East Boston

Numero de teléfono/correo electrónico/ Phone #/
email: _____

Creo que Suffolk Downs debería/no debería...

I think that the Suffolk Down project should(n't)

Suffolk Downs development should have at least 20% affordable units. And the affordability should not be limited to only 60% or 80% AMI, they should include 30 and 40% AMI.

Nombre\name: ~~Alex~~ Alex Zuluaga

Dirección\ address: 53 Bayswater St. #3 East Boston

Numero de teléfono/correo electrónico/ Phone #/
email:

Creo que Suffolk Downs debería/no debería...

I think that the Suffolk Down project should(n't)

Suffolk Downs development should include at least 4 PUBLIC play spaces for youth, meaning playgrounds soccer stadiums and basketball courts.

Nombre\name: Alex Zuluaga

Dirección\ address: 53 Bayswater St. #3 East Boston

Numero de teléfono/correo electrónico/ Phone #/
email:

Creo que Suffolk Downs debería/no debería...

I think that the Suffolk Down project should(~~n't~~)

- have housing for families - 25% 3-4 BR
- ^{affordable} accessible housing - 60% is current need in Boston
acc to Boston stats
- rent control in perpetuity
- no displacement of current E Boston/Revere residents
- build project only with union labor

Nombre/name: make this a public project - open to all

Dirección/
address: -

Numero de teléfono/correo electrónico/ Phone #/
email: _____

HPM must underwrite
cost for more transportation
and other public services

~~Creo que Suffolk Downs debería/no debería...~~

~~I think that the Suffolk Down project should(n't)~~

- Needs of current community residents must
be primary and have a seat at the table
~~where~~ with corporate decision makers

This project will affect my neighborhood of JP
with rising rents, loss of economic-social diversity

Nombre/name: Henrietta N. Barnes

Dirección/
address: 58 Robeson St, JP MA 02130

Numero de teléfono/correo electrónico/ Phone #/
email: _____

Creo que Suffolk Downs debería/no debería...
I think that the Suffolk Down project should(n't)

Nombre\name: Jose Muñoz

Dirección\
address: 20 1/2 New Park St., Lynn, MA 01905

Numero de teléfono/correo electrónico/ Phone #/
email: _____

Creo que Suffolk Downs debería/no debería...
I think that the Suffolk Down project should(n't)

Nombre\name: _____

Dirección\
address: _____

Numero de teléfono/correo electrónico/ Phone #/
email: _____

Creo que Suffolk Downs debería/no debería...
I think that the Suffolk Down project should(n't)

Nombre\name: Jose Velasquez

Dirección\
address: 300 meridiana ST #4

Numero de teléfono/correo electrónico/ Phone #/
email: _____

Creo que Suffolk Downs debería/no debería...
I think that the Suffolk Down project should(n't)

Nombre\name: _____

Dirección\
address: _____

Numero de teléfono/correo electrónico/ Phone #/
email: _____

PREGUNTA / QUESTIONS:

Del - chupón, Assembly Square accesible, una plaza para que uno sea

COMENTARIO / COMMENT:

... Ser una cancha de deporte para todos; un lugar donde uno pueda llevar^a los niños. Con el proyecto como queda, con tanto carro, gente, edificios, etc. le va a empeorar mucho al ambiente - ¿por qué no un parque donde que beneficia al ambiente. Estas residencias deberían ser para personas del barrio, a un precio que podamos alcanzar. He visto las tiendas raras que se subieron en Assembly Square, y hasta un complejo grande en Chinatown que no cumplió guardar departamentos más baratos como comprometían.

PREGUNTA / QUESTIONS:

non -

COMENTARIO / COMMENT:

... Ser una escuela pública, o otro tipo de proyecto que sea positivo para la nueva generación que viene. Si van a construir allí, creo que debe de ser un hospital, algún lugar para personas discapacitadas. ~~Hastings~~ Si hay residencias en Suffolk Downs, tiene que ser de un precio accesible para nosotros los residentes del área. La renta ya es cara aquí, y no queremos

que sea aún más cara para todos por parte de este proyecto. Ahora vivo en Lynn, pero era residente de East Boston por 25 años. I have been fighting with City Life/vida urbana, and I am fighting for Suffolk Downs to not be carried out on behalf of all the neighbors here.

COMENTARIO / COMMENT:

Como residente de East Boston por mas
de 30 años queremos viviendas / apartamento /
Unidades accesibles. Tienen de tomar en cuenta
que la mayoría de nosotros ganamos el
minimum y para poder sobrevivir tenemos
que tener 2 trabajos.

Extender el periodo para dar nuestros
terminos.

Queremos que aumenten el porcentaje
para la vivienda accesibles

PREGUNTA / QUESTIONS:

porque en el plan no han incluido
iglesias proyectos gratuitos
para la comunidad.

porque no piensan en lo que
la comunidad necesita.

Template #1:

I am a renter, my income is under _____% AMI. These units are not being built for me, my family or my neighbors and their families.

Ejemplo #1:

Yo soy un inquilino(a), me ingreso es debajo del 25 % AMI. Estas unidades no están siendo construidas para mi, mi familia o mis vecinos y sus familias.

Template #2:

Yo e vivido en East Boston 30 años. Me merezco quedarme viviendo en mi comunidad. Este proyecto no se enfoca en crear algo para mi comunidad, no es para nosotros y no lo queremos.

Ejemplo #2:

I've lived in East Boston _____ years. I deserve to stay living in my community. This project is not focused on building something for my community and it is not for us an we do not want it.

Judy Burnette

COMENTARIO / COMMENT:

I'm against this project, I suspect usual corruption of the BPDA. There should be an opportunity to stop this project & government should be held accountable through a referendum. We need the chance to approve or deny via popular vote of city residents. What comes of this project needs to truly reflect what the current residents want, such as 50% affordable housing based on an AMI taken of city of Boston residents only.

PREGUNTA / QUESTIONS:

COMENTARIO / COMMENT:

Blake Shetter

I represent Iglesia Nuevo Amanecer, the Spanish language ministry in Our Saviour's Lutheran Church in East Boston. I fear for the future of our parishioners & community due to the Suffolk Downs project. This place should give first pick to 80% of apartments to people who are already East Boston residents, raise the percentage of affordable housing to 45% based on AMI 30%.

PREGUNTA / QUESTIONS:

How are you going to give Eastie residents a voice and vote in this process.

Creo que Suffolk Downs debería/no debería...

I think that the Suffolk Down project should(n't)

→ Build a massive, overwhelmingly ~~over~~ higher income development in the city. **MANY MORE LOW TO LOW-MODERATE** income affordable units need to be built for families. Three bedroom units, possibly larger, that are affordable for incomes that most current residents have. Building more luxury does not bring housing costs down. Claire Gosselin

Nombre/name: _____

Dirección/
address: _____

25 Cotton Street, Roslindale, MA 02131
a Part of Boston

Numero de teléfono/correo electrónico/ Phone #/
email: _____

Creo que Suffolk Downs debería/no debería...

I think that the Suffolk Down project should(n't)

The development should include at least 50% truly affordable, 30% AMI. It's time to shift the balance so that people with a variety of incomes can live and work in the city.

Nombre/name: _____

Claire Gosselin

Dirección/
address: _____

25 Cotton St, Roslindale MA 02131

Numero de teléfono/correo electrónico/ Phone #/
email: _____

COMENTARIO / COMMENT:

My nombre es Candida Guerra

Soy residente de E. Boston desde 20 años

tengo hijos-nietos-hermanos y mas Familia

Me preocupo porque ya casi no alcanzamos -
apagar las rentas tan altas

PREGUNTA / QUESTIONS:

que Son Familias pequeñas

abran escuelas parques canchas de Fútbol
Clinicas Medicas.

Será que podre vivir en ese lugar

con Mi Familia con lo que ganamos al
año es de \$ 40,000

COMENTARIO / COMMENT:

Marta Lazo

No estoy de acuerdo, necesitamos algo que nos conviene. El número de cuartos asequibles debe de ser 30%, y NO 13%. Además, deben de bajar el número ~~de~~ a 20% del AMI. Este proyecto va hacer peor el tráfico, y por ese debe de construir menos edificios para disminuir el impacto negativo. He vivido aquí por 20 años. Antes vive en la calle 25 de la Chelsea St. Yo ~~era de la Chelsea St.~~ ~~me quisieran desalojar~~ y gane mi caso, Luche por 2 años. y ya soy dueña de casa por ganar rent control en mi apartamento viejo.

PREGUNTA / QUESTIONS: Yo quiero rent control en ^{mi vecindario} ~~mi vecindario~~ porque me preocupa el desarrollo de mis vecinos.

¿Cómo ~~se~~ vamos a sobrevivir con todo eso desarrollo que aumenta los costos de vivir?

Yo escuché de este proyecto a través de City Life, entonces, ¿Cómo va el gobierno a involucrar la gente en este proceso, para qué tengamos una voz en las decisiones?

Va ver rent control? Porque mis vecinos lo necesitan.

Me llama Blanca Guevara. Y soy inquilina y vivo en 833 Garland St en Chelsea, bien cerca de Suffolk Downs, yo vivido allí por 5 años. Esto apuerta al proyecto H4m en Suffolk Downs porque quiero una escuela nueva y publica igual con un parque con una cancha de baseball que sea visible y accesible para la comunidad vecindaria y local. Y tambien quiero ver mas del 13% de viviendas accesible, quiero 50% de viviendas accesible, y quiero que el AMI de las viviendas accesibles reflejan mi ingreso de 40% AMI. Queremos viviendas accesible para las comunidades trabajadoras de color. Estoy opuesto de este desarrollo, no lo quiero si no cumple con mis demandas. Gracias. Blanca Elisavet Guevara

My name is Laura Foner. I am a homeowner who has lived in Boston since 1975. I am opposed to the HYM Suffolk Down project because the high rents in the 10,000 new units will be unaffordable to most people who live in East Boston and other surrounding neighborhoods. ~~It~~ will also further raise the cost of housing in the city, displacing more working class and low income residents, disrupting our communities and making it harder for people to live in Boston. We don't need more luxury housing. We especially don't need private streets, sidewalks and parks. We need more public spaces. The city should be encouraging affordable housing and strong communities, with public parks, schools, libraries and health centers, not private developments for the wealthy.

Creo que Suffolk Downs debería/no debería...
I think that the Suffolk Down project should(n't)

Creo que Suffolk Downs debería tener mas
de un 13% de Accesible para nosotros que
ganamos menos que sea accesible

Nombre\name: Guillermo Escobar

Dirección\
address: 83 gailund st chelsea MA 02150

Numero de teléfono/correo electrónico/ Phone #/
email: _____

Creo que Suffolk Downs debería/no debería...
I think that the Suffolk Down project should(n't)

Nombre\name: _____

Dirección\
address: _____

Numero de teléfono/correo electrónico/ Phone #/
email: _____

Me gustara que hubiera una cancha de
fútbol Escuela parque para los niños
y por lo menos un 50% ^{vivienda} Accesible para todos

Gracias esobai

COMENTARIO / COMMENT:

Mi Nombre es: Noemy Rodríguez
He vivido por ~~Tarros~~ en E. Basfor
Soy madre de 3 niños, y es difícil
la situación q' estamos viviendo ya
que nuestro salario es el mínimo
y esto nos hace sentir mal ya
q' no los toman en cuenta por ser familias
de bajos recursos.

PREGUNTA / QUESTIONS:

- Habrá oportunidad que yo pueda
calificar? ya que yo gané \$20,000 por año?
- tendrán áreas Verdes?
- Nos darán la oportunidad o la prioridad
y nosotros los residentes que estamos
en riesgo de desempleo?

Creo que Suffolk Downs debería/no debería...

I think that the Suffolk Down project should(n't)

BE BUILT BECAUSE I HAVE EXTREMELY LOW INCOME, A LITTLE OVER \$10,000 A YEAR (VIA DISABILITY) & THIS PROJECT DOES NOT TAKE INTO CONSIDERATION INCLUDING HOUSING FOR PEOPLE LIKE ME, SENIOR CITIZEN/DISABLED/EXTREMELY LOW INCOME. THEREFORE THE SO CALLED "AFFORDABLE HOUSING" ISN'T AFFORDABLE FOR MANY PEOPLE LIKE ME.

Nombre\name: LOUISE PEATFIELD

Dirección\ address: 362 MERIDIAN ST. E.B. MA. 02128

Numero de teléfono/correo electrónico/ Phone #/
email: _____

Creo que Suffolk Downs debería/no debería...

I think that the Suffolk Down project should(n't)

Nombre\name: _____

Dirección\ address: _____

Numero de teléfono/correo electrónico/ Phone #/
email: _____

Creo que Suffolk Downs debería/no debería...

Debería cambiar el porcentaje en el ingreso mediano por familia para que familias latinas e inmigrantes de EB puedan comprar.

Nombre: Sindy Castillo

Dirección: 319 par's st East Boston

Numero de teléfono/correo electrónico: _____

—

Creo que Suffolk Downs debería/no debería...

Ampliar el porcentaje de viviendas accesible para las familias de East Boston.

Nombre: _____

Dirección: _____

Numero de teléfono/correo electrónico: _____

—

Creo que Suffolk Downs debería/no debería...

Debería hacer vivienda accesibles
para las familias de bajos recursos
de East Boston.

Nombre: Keidy Solorzano

Dirección: 168 Gove St #3 East Boston MA 02128

Numero de teléfono/correo
electrónico: _____

—

Creo que Suffolk Downs debería/no debería...

Debería tener mas viviendas accesibles
para las familias de East Boston

Debería tambien tener mas hospitales mas escuelas
Iglesias, mas parques, mas escuelas

Nombre: _____

Dirección: _____

Numero de teléfono/correo
electrónico: _____

—

Creo que Suffolk Downs debería/no debería...

Tener en cuenta las opiniones de la gente de la comunidad, tener mas acceso a las personas con bajos ingresos, una estación de bomberos y policia y garantizar el no desplazamiento de las personas.

Nombre: Catalina Rojas

Dirección: 51 Sagamore st apto #1

Numero de teléfono/correo electrónico: _____

—

Creo que Suffolk Downs debería/no debería...

Nombre: _____

Dirección: _____

Numero de teléfono/correo electrónico: _____

—

Creo que Suffolk Downs debería/no debería...

Creo que debería tener viviendas ~~cooperativas~~
Cooperativas y espacios para el desarrollo
comunitario. Centros Educativos accesibles.

Nombre: Liliana Arendano

Dirección: 75 white st Apt 3.

Numero de teléfono/correo
electrónico: _____

—

Creo que Suffolk Downs debería/no debería...

No debería tener viviendas de alto costo
no debería tener transporte privado. ni
tantas zonas de trote y parques si eso
le quita la oportunidad de vivienda a
personas de bajos ingresos.

Nombre: _____

Dirección: _____

Numero de teléfono/correo
electrónico: _____

—

Creo que Suffolk Downs debería/no debería...

Nombre: ERGUIN Flores

Dirección: 118 beacon st clelsea ma 02150

Numero de teléfono/correo
electrónico: _____

Creo que Suffolk Downs debería/no debería...

deberia tener un 30% de vivienda accesible
Para las personas que viven en east boston

Nombre: _____

Dirección: _____


Numero de teléfono/correo
electrónico: _____

COMENTARIO / COMMENT:



Si ba VaUer Construccion
de uerion para familia grandes
de uerion poner bajo costo.
de 20,00 de ueria ser publicos
para todos. No queremos Renta
para millonario. Queremos parte
de nuestra Comunidad.

PREGUNTA / QUESTIONS:

queremos parte que enberdad apoye
a la Comunidad a la parte de pago.
incremento, el rico entre mas
tiene mas quiere mucho ojo 
en eso

Creo que Suffolk Downs debería/no debería...

I think that the Suffolk Down project should(n't)

be built. It's a bad precedent to build a "luxury" town with little to no deeply affordable housing. This will have an impact city wide. I do not want my tax dollars to pay for protections and amenities for what amounts to a gated community. East Boston is historically a gateway city welcoming and affordable to people of all across the economic spectrum largely immigrants. That fabric of E. Boston will

Nombre/name:

Dirección/
address:

Numero de teléfono/correo electrónico/ Phone #/
email:

Creo que Suffolk Downs debería/no debería...

I think that the Suffolk Down project should(n't)

be destroyed by this project.

There was no community participation leading to the rollout of this plan. The working class immigrants who live here were not consulted. Given that Hym's Director used to be the head of the BRA, this process smacks of corruption. I think the project should be subjected to a city wide vote to determine

Nombre/name: Irene Glassman

Dirección/
address:

90 Wenham St #1 Jamaica Plain MA 02130

Numero de teléfono/correo electrónico/ Phone #/
email:

Mireya Gomez 40 rento y vivido en East Boston
por 24 años.

- Yo gano \$12 x hora trabajando 40 horas semana/
con este ingreso obtendria una vivienda?
- Mis hijos tienen sus amigos de infancia aquí
este desplazamiento causara problemas
emocionales.
- East Boston es privilegiado porque nosotros
los habitantes tenemos muchos recursos para
nuestros niños, como ciudades de niños
- Habran mas parques
- Queremos escuelas.
- Clinicas.
- Afectara el nivel de vida o
income de zonas abedañas como
Revere y Chelsea.
- Sera un pueblo rico dentro de
un pueblo pobre esto generara
discriminación. Para evitar esto
seria q' la vivienda accesible
este mezclada con los otros
- Como se tendra un cuidado
q' los q' no tienen viviendas
momentales - munda para ellos.

COMENTARIO / COMMENT:

My name is Hineya Gomez - he vivido siempre rentando.
tengo 2 hijos nacidos y crecidos en East Boston, No
me imagino mi vida en otro lugar; todos mis recuerdos
y convivencia con mi familia estan aqui. En este
momento veo como se han ido lejos muchas
personas con las q' convivo a travez de 25 años;
Este desplazamiento debido al alto costo de las
viviendas.

PREGUNTA / QUESTIONS:

- Una persona de bajos ingresos califica para
estas viviendas.
- Habran Apartamentos para familias grandes y
de bajos ingreso.
- Habra mas pollution debido al incremento
de personas con carros han pensado como
mantener un ambiente saludable.
- para las viviendas accesibles - del 13%
q' ingreso aplicaria.
- Un 30% de vivienda accesible.
- Control de Renta

Omar Madrigal
233 London St. East Boston.

COMENTARIO / COMMENT:

El desarrollo es una injusticia para la
comunidad, y destaca aún más los
problemas que ya existen. Si mis hijos no
se pueden graduar de la universidad, no
van a poder vivir en East Boston.
Tengo muchos amigos que los están desalojando,
porque los dueños ya no piensan en las
familias, solo en la inversión. El desarrollo va
a incrementar más las rentas, y no vamos
a poder sostener nuestras familias.

PREGUNTA / QUESTIONS:

¿Porqué tienen que invertir en East
Boston? Hay mucho terreno en las
afueras, no deben invertir donde
ya hay mucha comunidad. Va
a ser un caos para los residentes
de East Boston, Revere, y Chelsea.
¿Cuántas canchas públicas van a
ver en el desarrollo? Van a venir a
usar nuestras carreteras y crear tráfico,
¿Cuál va a ser la inversión social?

My name is Madeleine Taylor-McGrane. I am a student and I have lived in Cambridge for 4 years. I am opposed to the HYM Suffolk Down project because the high rents in the 10,000 new units will raise rents in the area to a level that current residents will be unable to afford, causing working people to be unable to afford to live in Boston anymore. This project would show the clear prioritization of luxury housing for the rich over the basic right to housing of the average person by the city. I am also concerned about the privatization of the streets, sidewalks, and parks in Suffolk Downs. These spaces should be public. I think that at the very least ~~25~~ 30% of the housing units in the development should be affordable. Furthermore, the definition of "affordable" should be reduced from the ridiculously high price it currently is to a price comparable to that currently paid by low income residents in the area.

COMENTARIO / COMMENT:

I was born and raised in East Boston, and my
immigrant parents were lucky enough to buy
a triple decker in Jeffries Point in the
late '90's. Unfortunately, that is no longer a
common story for immigrants, which is why
I graduated Suffolk University and came to work
at a non-profit in East Boston. The displacement
caused by an elitist development of this mag-
nitude cannot be undone by a million advocates
Please incorporate a socially responsible lens for
~~PREGUNTA / QUESTIONS:~~ the proposed development.

The community needs parks, soccer fields,
and affordable housing and commercial
spaces that allow for successful cohabitation
and a smooth addition to the East Boston
community, not the creation of another
Seaport, which only yuppies can enjoy

Alex Zuluaga
53 Bayswater st. #3 East Boston

Creo que Suffolk Downs debería/no debería...

I think that the Suffolk Down project should(n't)

think about the size of the units for families. The sizes of some of the units should be 1400-1600 sqft so they can house families.

The entire project can't be based on Micro units

Also the AMI is too high! We need the AMI to be based on realistic expectations on real salaries. Many people in the

city make minimum wage. The AMI should reflect that reality not the federal limit

Nombre/name: Nicole Daley

Dirección\

address: 8 West Main St, Mattapan MA 02126

Numero de teléfono/correo electrónico/ Phone #/

email: _____

Creo que Suffolk Downs debería/no debería...

I think that the Suffolk Down project should(n't)

Have rent control or don't build it. We can't have neighborhood pushed out within a few years of completion. Families ground and invest in communities. The vision of Suffolk Downs should think about how to help families stay. This project needs to have a school and a community center at least.

Nombre/name: _____

Dirección\

address: _____

Numero de teléfono/correo electrónico/ Phone #/

email: _____

Creo que Suffolk Downs debería/no debería...

Nombre: Evelyn Obregon

Dirección: 223 Havre St #1 E. Boston MA.

Numero de teléfono/correo

electrónico: 617 970-1336

No queremos mas viviendas de lujo
Exijimos mas viviendas economicas.

Creo que Suffolk Downs debería/no debería...

Nombre: Isabel Chavez

Dirección: 393 meridian st #2 East Boston MA

Numero de teléfono/correo

electrónico: _____

No estoy de acuerdo con mas construcciones
de lujo solicito se construyan mas
viviendas economicas y hagan un plan
de desplazamiento.

Creo que Suffolk Downs debería/no debería...

Nombre: Maria Cunningham

Dirección: 810 Border St East Boston

Numero de teléfono/correo electrónico: _____

Como Residente de East Boston
Pido que se incrementen el número de
de viviendas económicas.

Creo que Suffolk Downs debería/no debería...

Nombre: Maria Mayorga

Dirección: 5 Monmouth St Apt 2 E. Boston

Numero de teléfono/correo electrónico: _____

Como Residente de East Boston,
exijo que desaceleren el proceso
y trabajen con los defensores de la
Vivienda y los residentes para
abordar nuestras inquietudes.

Creo que Suffolk Downs debería/no debería...

Nombre: Silvia Landaverde

Dirección: 82 Trenton st. E. Boston 02128

Numero de teléfono/correo electrónico: _____

- Como residente de east Boston solicito, la propuesta para que incrementen el % de viviendas de bajo ingreso.

Creo que Suffolk Downs debería/no debería...

Nombre: Ruth Landaverde

Dirección: 82 Trenton St Apt # 2

Numero de teléfono/correo electrónico: 82 13

Como residente de EAST Boston
Exijo que trabajen con los defensores de las viviendas y los residentes para crear un plan de mitigación de desplazamiento

Creo que Suffolk Downs debería/no debería...

Nombre: Marlene Judith Guevara

Dirección: 3 Sumner Place apt 4 02128 MA

Numero de teléfono/correo
electrónico: _____

Como Ciudadana solicito que se construyan
mas viviendas economicas para toda
la comunidad de East Boston.

Creo que Suffolk Downs debería/no debería...

Nombre: Gladys L Villanueva

Dirección: #236 Moyersck St East Boston MA
02128

Numero de teléfono/correo
electrónico: _____

* No mas protectos y necesitamos trabajar
con los defensores. y los residentes
para abordar nuestras inquietudes.

Creo que Suffolk Downs debería/no debería...

Nombre: Gissell Beato

Dirección: 6 ANTHONY J GRIECO TERRA E. BOSTON

Numero de teléfono/correo
electrónico: _____

Espero que trabajen con la comunidad
aborden las inquietudes de la comunidad
y construyan mas viviendas economicas.

Creo que Suffolk Downs debería/no debería...

Nombre: Noemi Erazo

Dirección: 139- Chelseast.

Numero de teléfono/correo
electrónico: _____

Solicito desaceleren el proceso de construcción
y trabajen con los residentes de la comunidad
y construyan un plan de mitigación y mas
viviendas economicas.-

Creo que Suffolk Downs debería/no debería...

Nombre:

Olga Fareso.

Dirección:

30 Webster St - #1 E.B. MA. 02128

Numero de teléfono/correo electrónico: _____

Que Realizen Vivenas seguras.
y no Cobren Macho

Creo que Suffolk Downs debería/no debería...

Nombre:

Olga Fareso

Dirección:

30 Webster St #1 E.B. MA - 02128

Numero de teléfono/correo electrónico: _____

Creo que Suffolk Downs debería/no debería...

Nombre: Irma Gutierrez

Dirección: 8 West Eagle St East Boston MA

Numero de teléfono/correo
electrónico: _____

Como residente de East Boston, solicito que desacelere el proceso y trabaje con los defensores de la vivienda, he incrementado el porcentaje de viviendas económicas.

Creo que Suffolk Downs debería/no debería...

Nombre: Crista Dalia Fuentes

Dirección: 41 Bennington #3

Numero de teléfono/correo
electrónico: _____

Exijo que incrementen el porcentaje de viviendas económicas y no quiero mas viviendas de lujo, que haya mas tráfico y mas contaminación

Creo que Suffolk Downs debería/no debería...

Nombre: Vilma Gálvez

Dirección: 178 Bennington St. #1R East Boston 02128

Numero de teléfono/correo electrónico: _____

- Por favor Señor Alcalde: construcción de viviendas
- Desacelere el proceso ^{de construcción} y por favor trabaje con los defensores de la vivienda
 - Crear viviendas de precios módicos para la población de bajos ingresos
 - Evitar el desplazamiento. Gracias

Creo que Suffolk Downs debería/no debería...

Nombre: Reina Martínez

Dirección: 178 Bennington St. 1R E. Boston

Numero de teléfono/correo electrónico: _____

Sr. alcalde por desacelerar el proceso de construcción de viviendas
a precios módicos para la población de bajos recursos
Evitar el desplazamiento.

Creo que Suffolk Downs debería/no debería...

Nombre: Duke Acosta

Dirección: 534 Bennington St

Numero de teléfono/correo electrónico: _____

No estoy de acuerdo con mas
vivienda de lujo para
esta zona: Queremos + ECOPO
MICAS.

Creo que Suffolk Downs debería/no debería...

Nombre: Jesus Acosta

Dirección: 534 Bennington St #1

Numero de teléfono/correo electrónico: _____

NO MAS desplazamiento con
vivienda que las personas -
de poco recurso NO pueden
pagar.

Creo que Suffolk Downs debería/no debería...

Nombre: Eugenia J. Soto

Dirección: 23 Landing St

Numero de teléfono/correo electrónico: _____

Necesito que se trabaje con la comunidad en un plan de mitigación y desacelerar el proceso de construcción.

Creo que Suffolk Downs debería/no debería...

Nombre: Audy Tejeda

Dirección: 17 London St

Numero de teléfono/correo electrónico: _____

TO MAKE MORE AFFORDABLE HOUSING FOR LOW INCOME PEOPLE.

Creo que Suffolk Downs debería/no debería...

Nombre: Margarita Quintero

Dirección: 30 Havre St. (East) East Boston

Numero de teléfono/correo
electrónico: _____

- Desacelerar el proceso con los defensores de la vida
- Asegurabilidad real.
- Hacer que incluya planes de desplazamiento.

Creo que Suffolk Downs debería/no debería...

Nombre: Davis Zapata

Dirección: 200 Brandeis Dr. East Boston Ma.

Numero de teléfono/correo
electrónico: _____

- se solicita un 5% de vivienda acoSille para personas de bajos recursos y familias con hijos y ancianos

Creo que Suffolk Downs debería/no debería...

Nombre: Floridulma Gelista

Dirección: 129 Cottage St. East Boston

Numero de teléfono/correo electrónico: _____

me gustaria que construyeran mas viviendas economicas y que no alien. mas desplazamientos.

Creo que Suffolk Downs debería/no debería...

Nombre: Gilma Fuentes

Dirección: 41 Bennington St. Apt 3, East Boston 02128

Numero de teléfono/correo electrónico: _____

- Todas las personas, tenemos derecho a una vivienda digna, para operar educación, y estabilidad a nuestras familias.
- Crear un plan previo. antes de iniciar. Construcción sobre los afectados. en las nuevas construcciones. ———. Por una vecindario y viviendas dignas.

Creo que Suffolk Downs debería/no debería...

Nombre: Edna Perlera

Dirección: 150 London st

Numero de teléfono/correo
electrónico: _____

Yo como residente de esta bella ciudad.
pido y Exijo que Apollen a la Comunidad para la
Construccion de viviendas mas dignas y economicas
que se adapten a la realidad que cada uno de
nosotros vivimos todos los dias.

Creo que Suffolk Downs debería/no debería...

Nombre: Douglas Henriquez

Dirección: 150 London st

Numero de teléfono/correo
electrónico: _____

Solicito que el Alcalde desacelere
el proceso de construcion y que
incremente el % de viviendas
economicas.



Pay Jan DOH 12/15/9
 #16,557h
 500/0 End of Year
 Conditions

o he message with Developers

— The city should tell the Developer
 The Rate 25-30% of unit should
 be affordable before they get the
 Permit, 20-30%

— and that agreement should
 be signed by the city, The
Developer or the committee

Legal Representative and

after that we must create
 a supervisory team to
 check if those agreement
 are implemented or Respected

City life

Creo que Suffolk Downs debería/no debería...

El Promedio de Ingreso DEBERIA SER
CALCULADO POR LA GENTE QUE OJEE EN
EAST BOSTON O BOSTON NO NEWTON,
BRIGHTON, ETC. PARA QUE SEA MAS REAL.

Nombre: LUZ ZAMBRANO

Dirección: 25 JEFFRIES ST. E.B.

Numero de teléfono/correo
electrónico: _____

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)..

I think that the Suffolk Downs
Should create opportunity for
all. Not only a certain group of
people.

Name/nombre: Tania Quesada

Dirección/address: 90 Grove Apt

Número de teléfono/correo electrónico/Phone #/email:

852 991 1111

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)..

Debería si Hay Viviendas para personas
Que Ganan menos de 50,000. al Año.

Name/nombre: Marlon Flores (Pastor Iglesia Americana

Dirección/address: 500 Broadway Everett. Ma.

Número de teléno/correo electrónico/Phone #/email:

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)..

No Debería porque Aumenta La
Renta 15 Millas a La Redonda
Y No hay Vivienda Accesible Para Los
que GANAMOS 30,000. al año.

Name/nombre: Jose Romero

Dirección/address: 841 River St Pwy. River St.

Número de teléno/correo electrónico/Phone #/email:

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)..

We need more churches
Brazilian, Spanish etc...

Paster Aynaldo

Name/nombre: Pastora Blaine Washa

Dirección/address: 164 Liverpool ST East Boston

Número de teléno/correo electrónico/Phone #/email:

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)..

It'll raise ^{rent} ~~the~~ beyond
what I can afford.

Sindy Castillo

Far from transport I don't have a car

Stand For
Democracy

Name/nombre:

Rosiane De Melo

Dirección/address:

31 37 Arnold St, Revere, 02151

Número de teléfono/correo electrónico/Phone #/email:

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)..

Because I always lived in the area
and all my life is around here
I am not ready to move out -
I am 71 years old. I need to
come to the clinic.

Name/nombre: Marina Schueng

Dirección/address: 150 Captain Row Chelsea- MA

Número de teléfono/correo electrónico/Phone #/email: , _ _ _ 1 .

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)..

Because the rent will get higher
I won't be able to pay and
I don't have another option at
the moment.

Name/nombre: Ana Mauricio

Dirección/address: 500 GOVERNOR'S DR # WINTHROP. MA

Número de teléfono/correo electrónico/Phone #/email:

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)...

I lived in East Boston for 6 years and
I think this project will affect the Hospitals
and schools and the rent.

Name/nombre: Lurdes Pinheiro Evangelista de Souza

Dirección/address: 97 CHELSEA ST EAST BOSTON MA

Número de teléno/correo electrónico/Phone #/email:

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)...

Eu não concordo porque a minha
Filha ~~no~~ estuda aqui East Boston
e eu moro a 12 anos aqui, e para mim e minha Filha
é melhor porque o Aluguém é mas barato e o transporte
é e mas proximo.

Thanks !!!

Name/nombre: Fabiano Alves Barbosa

Dirección/address: 92 ~~Chas~~ Chelsea St East Boston

Número de teléno/correo electrónico/Phone #/email:

creo que Suffolk Downs Deberia/no deberia...

I think that the Suffolk Downs project should(n't)..

Não concordo por causa do Aluguel não ser acessível
em todas as paragens

Name/nombre: Bruno Fernandes

Dirección/address: Chelsea St

Número de teléno/correo electrónico/Phone #/email:



Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)..

Eu acho que esse projeto não deve ser realizado, pois vai dificultar muito a vida de muitas pessoas, principalmente em relação ao aumento dos alugueis e transportes e o uso do hospital.

Name/nombre: Milivani Pereira

Dirección/address: 63 LUBEC ST EAST BOSTON

Número de teléno/correo electrónico/Phone #/email:

Stand For
Democracy

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)..

~~Edo~~ Shouldn't do this because ~~it~~ it will
win the community

Name/nombre: Marcelo Macedo

Dirección/address: 76 Frankfurt

Número de teléno/correo electrónico/Phone #/email:

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)..

Eu não concordo com este projeto, por motivo
que eu dependo muito desta cidade, mais
ainda, Todo estará crescendo o Valor de aluguer
e não Teremos condições com estes Valores.

Name/nombre: Carlos Leite

Dirección/address: 142 School St # 302

Número de teléno/correo electrónico/Phone #/email:

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)..

A PETA AS ESCOLA ONDE
ESTUDA MEUS FILHOS
OS HOSPITAIS
ONDE TEMOS NOSSOS SEGUROS
ISSO E DESSUMANDO...

Name/nombre:

ROBERTO ARAUJO

Dirección/address:

10 ANTONY & GRIECO APT 2

Número de teléno/correo electrónico/Phone #/email:

—

—

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)...

My son studies in East Boston
and with this construction ~~may~~
he won't be able to stay at
school the ~~school~~ he loves
so much, and it's not fair to
people.

Stand For
Democracy

978 294
91-13

Name/nombre:

Helia Francisco Dos Santos

Dirección/address:

142 Dolphin Ave

Número de teléno/correo electrónico/Phone #/email:

—

Stand for
Democracy

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)..

I think this project would affect the whole community AND especial my family, I can't afford the rising rent, I can't let my children out school here in my community, hospital its near AND traffic would kill every one.

Name/nombre: Wesley Costa

Dirección/address: 218 PARIS ST #2

Número de teléno/correo electrónico/Phone #/email:

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)..
Stand For Democracy

*I'am living here for 14 year and I believe
it's not a good think for us. The rent will be up
and my work its not to High for pay. I need the
really enter if I moved I'll lost.*

Name/nombre: Fabricia RODRIGUES

Dirección/address: 221 chelsea st #1 East Boston

Número de teléfono/correo electrónico/Phone #/email:

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)...

Stand For
Democracy

I am more aqui à 14 anos e não acho conveniente porque somos trabalhadores não seremos beneficiados sem prejudicados algum caso, perderemos escola de nossos filhos e precisamos dos transportes

Name/nombre: Edmilson de Sales

Dirección/address: 221 Chelsea St East Boston

Número de teléno/correo electrónico/Phone #/email:

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)...

Vai ficar difícil Por que minha filha
estuda e vou ter que mudar p/ outro
lugar e transferir minha filha de direção
Não é uma boa ideia

Stand For
Democracy

Name/nombre: marlei Rodrigues

Dirección/address: 21 Moore St AEST Borton

Número de teléno/correo electrónico/Phone #/email:

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)..

I BELIEVE THAT SUFFOLK DOWNS will increase
THE RENT ; THE BILLS ; THE ACCESS AT SCHOOLS .
IT'S ALREADY INCREASE THE RENT , and we can't
AFFORD IT.

Name/nombre: ROBSON MAURICIO

Dirección/address: 500 GOVERNORS DRIVE #07

Número de teléno/correo electrónico/Phone #/email:

Stand For
Democracy

Creo que Suffolk Downs Debería/no debería..

I think that the Suffolk Downs project should(n't)..

Shouldn't do this because I would
have to leave the city because it
will be too expensive for me and my
children will lose there education and
health system.

Name/nombre: Diana Macedo

Dirección/address: 16 Frankfort St apt 3R

Número de teléno/correo electrónico/Phone #/email:

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)..

NÃO DEVERIA, VAI AUMENTAR O ALUGUER
IMPEDINDO DEMORAR COM A MINHA FAMÍLIA
IR AO HOSPIITAL, ASSISTENCIA SOCIAL, OU PRECISO
DO HOSPIITAL.

Name/nombre:

TAFFAREL RAMIRO

Dirección/address:

63 LUBEC ST, EAST BOSTON

Número de teléno/correo electrónico/Phone #/email:

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)..
(n't) is circled in the original image

Stand For
Democracy

I think that the project shouldn't exist or if it does exist it should be made to be affordable for the working class, because for a city built by people should accommodate what the people that built the city. This would also increase rental prices causing people to leave the city and also the education system.

Name/nombre: Guilherme Bitencourt

Dirección/address: 218 Paris st East Boston

Número de teléno/correo electrónico/Phone #/email:

-

Stand For
Democracy

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)..

Eu não quero porque o projeto
não vai ter benefício para o homem
trabalhador.

Name/nombre: Josimar O. Silva

Dirección/address: 101 ADDISON ST EAST BOSTON 02128

Número de teléno/correo electrónico/Phone #/email:

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)..

bk this will cause a raise
in my rent and my transportation
(MBTA) will be hard for me to get
around.

Name/nombre: Marta Alves

Dirección/address: 117, Addison st #01

Número de teléno/correo electrónico/Phone #/email:

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)...

I lived in East Boston for 3 years and family
still alive, I do not want Hospitals and Schools to
be affected.

Name/nombre: Downay Evangelista de Souza

Dirección/address: 288A MAIN ST EVERETT

Número de teléfono/correo electrónico/Phone #/email:

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)..

because the rent come will
be more expensive for us.

Name/nombre: SILVIA GONZALEZ

Dirección/address: 279 Chelsea St apt 2 E. Boston 02128

Número de teléno/correo electrónico/Phone #/email:

mia.

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)..

No debería Porque yo no tengo lo
dinero suficiente.

It will kick me and my family out
and away from schools and the hospital.

Name/nombre:

Acta Adenilson De Melo

Dirección/address:

37 Arnold St Revere 02151

Número de teléfono/correo electrónico/Phone #/email:

—

Blake Shetter
Stand for Democracy

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)..

I lived in East Boston for 16 years.
This PROject will raise the rents.

Name/nombre: ELISABETH OLIVEIRA

Name/nombre: 221 SUMNER ST #1 BOSTON - MA

Dirección/address: 271 SUMNER ST #1 East Boston - MA

Número de teléno/correo electrónico/Phone #/email:

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)..

Pienso que el progreso personal, y comercial, financiero y de toda índole es importante sin atropellarnos como seres humanos. - igualdad para todos.

Name/nombre:

Adelina Lecca

Dirección/address:

29 Bennington St.

Número de teléno/correo electrónico/Phone #/email:

—

Blake Shetler
Stand x Democracy.

Creo que Suffolk Downs Debería no debería..
I think that the Suffolk Downs project should(n't)..

I don't want to because
it's going to make the rent higher.

Name/nombre: Alexandra Souza Pereira

Dirección/address: 211 KENTON St. East Boston

Número de teléfono/correo electrónico/Phone #/email:

Blake - shelter
Stand x. Democracy

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)..

~~Por~~ que construyendo esos edificios
todo se va a poner mas caro. y esos edi-
ficios basar para puras personas que
puedan pagar una renta a alto costo -
y para los que no pueden pagar -
no van a poder pagar.

Name/nombre: Beatriz y Janet placencia

Dirección/address: 32 West Eagle St Ha

Número de teléfono/correo electrónico/Phone #/email:

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)...

Más vías para los carros
Escuelas
Control Renta

Name/nombre: Maria Ospina

Dirección/address: 29 Bennington

Número de teléno/correo electrónico/Phone #/email:

6

Blake. Shetler
Stand x Democracy
571-526-7247

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)...

Muchos de las propiedades que quieren a ser
nuevas así nos afecta como estamos
en cast. boston. en precios altos.

Name/nombre: MAYRA Molina.

Dirección/address: Mass coach

Número de teléno/correo electrónico/Phone #/email:

buena esas propiedades Blake. shetler
son para gente de dinero stand x Democracy
nosotros nos afecta.

Creo que Suffolk Downs Deberia/no deberia...

I think that the Suffolk Downs project should(n't)..

Afectaría porque todo se pondría
más caro - y esos edificios son
para los que pueden pagar algo.
muy alto y afectaría a los que
no pueden pagar.

Name/nombre: Jesus Placencia

Dirección/address: 32. W. Eagle St. #2

Número de teléfono/correo electrónico/Phone #/email:

Jesus Placencia

Blake. Shetler
Stand X Democracy

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)..

- 1 No queremos contaminaciones del medio.
Ambiente,
- 2 No quiero que las Rentas no suban más
- 3 Hay que ayudar al prójimo, principalmente
a los niños. Dios le bendiga muchos.

Name/nombre: Francisco Ponce

Dirección/address: _____

Número de teléno/correo electrónico/Phone #/email:

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)..

Quisieramos un vecindario
sano para nuestros hijos

Name/nombre: ~~Rosa~~ Rosa moran

Dirección/address: 420 meridiana st E boston

Número de teléno/correo electrónico/Phone #/email:

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)..


no estoy de acuerdo que casi no se haya
se mejoren la cosas. todo salga bien
para todo. haya cosa diferente para
lo hispano.

Name/nombre: Sofia Romero

Dirección/address: _____

Número de teléfono/correo electrónico/Phone #/email: _____

Creo que Suffolk Downs Debería/no debería...
I think that the Suffolk Downs project should(n't)..

No

Name/nombre: Gladys Villanueva

Dirección/address: _____

Número de teléno/correo electrónico/Phone #/email:

Creo que Suffolk Downs Debería/no debería...
I think that the Suffolk Downs project should(n't)..

No debería

Name/nombre: Elean Creso

Dirección/address: _____

Número de teléno/correo electrónico/Phone #/email:

Creo que Suffolk Downs Debería/no debería...
I think that the Suffolk Downs project should(n't)..

No debería

Name/nombre:

Patricia Torres

Dirección/address:

Número de teléfono/correo electrónico/Phone #/email:

Creo que Suffolk Downs Debería/no debería...
I think that the Suffolk Downs project should(n't)..

No debería hay más
necesidad las personas
de pocos recursos.

Name/nombre: Eritza Crespo

Dirección/address: _____

Número de teléno/correo electrónico/Phone #/email:

Creo que Suffolk Downs Debería/no debería...

I, think that the Suffolk Downs project should(n't)..

No Queremos casas lujosas
solo casas accesibles a nuestro
proyecto que es muy bajo.

Name/nombre: victor lopez

Dirección/address: 101 Trenton st East Boston

Número de teléno/correo electrónico/Phone #/email:

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)..

Have large luxury apartments. Instead create a community center, that would benefit the city of Boston

Name/nombre: Marco - Gonzalez

Dirección/address: _____

Número de teléno/correo electrónico/Phone #/email:

Creo que Suffolk Downs Debería/no debería...

I, think that the Suffolk Downs project should(n't)..

Somos personas bajo ingresos y queremos lugares
q. sean accesibles para pagar.

Name/nombre: Cindy Sanchez

Dirección/address: 101 Trenton East Boston

Número de teléno/correo electrónico/Phone #/email:

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)...

Hacer viviendas asequibles para personas
humildes.

Name/nombre: Angie A. Delugo

Dirección/address: 33 Bow St #406, Somerville, MA 02143

Número de teléfono/correo electrónico/Phone #/email:

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)..

No debería porque
necesitamos mas casas para
personas con necesidades
No de lujo.

Name/nombre: Esther

Dirección/address: _____

Número de teléno/correo electrónico/Phone #/email:

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)..

Vivo y quiero que mi Comunidad
Sea Segura y accesible para
Pagarla y no Comercial

Name/nombre: Karen Garcia

Dirección/address: East Boston

Número de teléno/correo electrónico/Phone #/email:

Creo que Suffolk Downs Debería/no debería...

*I think that the Suffolk Downs project should(n't)..

Gano \$30,000
y Quiero vivir en mi ciudad

Name/nombre: Juan Bautista

Dirección/address: _____

Número de teléno/correo electrónico/Phone #/email: _____

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)..

Si construcion pero accesibles
para las Familias

Name/nombre: Kimberly Hernandez

Dirección/address: 53. Crescent Ave

Número de teléno/correo electrónico/Phone #/email:

607

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)..

si construyan pero mas accesibles
alas familias.

Name/nombre: willian Hernandez

Dirección/address: 53 crescent av - chelsea

Número de teléno/correo electrónico/Phone #/email:

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)..
.

Si debería pero tiene que ser beneficioso

Name/nombre: Britney Procter

Dirección/address: 53 Crescent Ave 02150

Número de teléno/correo electrónico/Phone #/email:

~~617-552-1234~~

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)..

la Razo por el cual
no queremos es porque
ba afectara nuestras
Familias

Name/nombre: Santana Melendez

Dirección/address: 143 EAST Boston MS

Número de teléno/correo electrónico/Phone #/email:

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)..

Porque no me parece que sea
un beneficio para la comunidad
que actualmente vive en E. Boston
y no me parece accesible economi-
camente para las familias.

Name/nombre: Idalia

Dirección/address: _____

Número de teléno/correo electrónico/Phone #/email:

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)..

NO CREO QUE BENEFICIE PORQUE
YA ESTA MUY CARA LA RENTA Y
SI NOS DESPLAZAN PERDEREMOS
MUCHOS BENEFICIOS.

Name/nombre: Luis

Dirección/address: _____

Número de teléno/correo electrónico/Phone #/email:

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)..

Me parece que sera bueno
para nuestra comunidad
por que no esta adnuestra
al conce ~~sta~~ adnuestra
economia financiera

Name/nombre: Martha Alicia pleitez

Dirección/address: 774 Gove St East Boston

Número de teléno/correo electrónico/Phone #/email:

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)...

Creo q afectaría a todas las familias
de escasos ingresos económicos a menos
q sean precios asequibles de renta

Name/nombre: Clara Miranda

Dirección/address: 214 Chelsea St AP #2

Número de teléno/correo electrónico/Phone #/email:

—

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't) ..

NO CREO QUE DEBON HACER VIVIENDAS DE LUJO
YA ES SUFICIENTE CON QUE SUBAN LAS RENTAS
TAN ESPERADOS ESO ES UN ABUSO

Name/nombre: GERMAN MURCIA

Dirección/address: 218 MOUNTAIN AVE apt 4

Número de teléno/correo electrónico/Phone #/email:

Creo que Suffolk Downs Debería no debería...
I think that the Suffolk Downs project should(n't)..

Nuestra comunidad hispana vive día a día poder
vivir y poder trabajar para tener un hogar
para toda su familia.

Name/nombre: Alma Escobar

Dirección/address: _____

Número de teléfono/correo electrónico/Phone #/email:

Creo que Suffolk Downs Debería/no debería...
I think that the Suffolk Downs project should(n't)..

NO debería

Name/nombre: Enid Cuspo

Dirección/address: 182 Wellington St Fall River

Número de teléno/correo electrónico/Phone #/email:

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)..

No debería / Shouldn't

Name/nombre:

Carlos Carmona

Dirección/address:

100 Stoddon St

Número de teléno/correo electrónico/Phone #/email:

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)..

You shouldn't do that 'cause we need
Houses that we can afford.

YOU SHOULDN'T.

Name/nombre: Elizabeth Carmona

Dirección/address: 100 stockton st chelsea

Número de teléno/correo electrónico/Phone #/email:

Creo que Suffolk Downs Debería/no debería...
I think that the Suffolk Downs project should(n't)..

no estoy de A cuerdo

Name/nombre: ANIBAL MUJO

Dirección/address: REVERE MA 02151

Número de teléno/correo electrónico/Phone #/email:

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)..

YA es suficiente, con la Des criminalización
y las Rentas tan altas.

GRACIAS

Name/nombre: Flore Johannes.

Dirección/address: 56 Green St. Revere.

Número de teléfono/correo electrónico/Phone #/email:

—

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)..

Queremos mas viviendas asequibles.
13% no es suficiente.

Name/nombre:

Orfa Noemy Umaña

Dirección/address:

228 WASHINGTON Av Apt. 2

Número de teléno/correo electrónico/Phone #/email:

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)..

Queremos viviendas accesibles
Para personas / familias de bajo
recursos.

Viviendas para desamparados.

No mas viviendas (proyectos) para personas/
familias que ganan mas de \$40,000 al año.

Name/nombre: Evelyn Gomez

Dirección/address: 170 Chelsea St E-Boston

Número de teléno/correo electrónico/Phone #/email:

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)...

We Can't pay
more Money

Name/nombre:

Karla Fuen

Dirección/address:

346 gardner St Chelsea MA

Número de teléno/correo electrónico/Phone #/email:

Creo que Suffolk Downs Debería/no debería...
I think that the Suffolk Downs project should(n't)..

pienso que

NO estoy de acuerdo.

Name/nombre: Maryori Bojorquez

Dirección/address: _____

Número de teléno/correo electrónico/Phone #/email:

Creo que Suffolk Downs Debería/no debería...
I, think that the Suffolk Downs project should(n't)..

Name/nombre: Jerry Ceballos NO estoy de Acuerdo

Dirección/address: 87 Wilbur St

Número de teléno/correo electrónico/Phone #/email: C

Creo que Suffolk Downs Debería/no debería...
I, think that the Suffolk Downs project should(n't)..

Name/nombre: Luis no es fox de 20

Dirección/address: 4 Florence terrace somerville MA 02145.

Número de teléno/correo electrónico/Phone #/email:

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)..

no - estoy de acuerdo que le ^{van} a la
venta q. mucha RENTA ~~no esta bueno~~
QUE ~~le bajen~~ A LA VENTA
QUE ~~ajusten~~ EL TRANSPORTE publico
que bajen el costo
del transporte

Name/nombre: Cristian Ocasio

Dirección/address: 3 Marion place Apt #2

Número de teléfono/correo electrónico/Phone #/email:

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)..

Creo que Suffolk Downs no debería aprobar este proyecto porque afectaría demasiado en la bolsa económica de cada familia ya que existen muchas familia hispanas a las cuales no tienen tantos beneficios y se ven afectados.

Name/nombre: Alisson Martinez

Dirección/address: 206 Havre St. East Boston Apt#3 02128

Número de teléno/correo electrónico/Phone #/email:

Blake Shetter
Stand for Democracy
(574) 536-7340

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)..

No debería porque nos afecta mucho
ah los latinos. porque aunque trabajamos
mucho no nos alcanza el dinero para
tantos gastos que tenemos en este
país...

Name/nombre: Ligia Karina Ortega

Dirección/address: 20.5. New park st apt 3 Lynn MA

Número de teléno/correo electrónico/Phone #/email:

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)...

Blake Shetter
Stand for Democracy
(574) 536-7340

Creo que suffolk no debería llevar acabo
este tipo de proyectos debido a que mi
vecindario tendria demasiado problemas
porque la renta aumentaria mas y la mayoria
saldria afectados porque tendríamos limitacion por
pagar viviendas

Name/nombre: Wilma Martinez

Dirección/address: 206 Havre st east Boston M.A. Apt #3

Número de teléno/correo electrónico/Phone #/email:

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)..

Se pondría muy cerca la Reta
muchas carreras en la calle
y mucho tráfico

Name/nombre: Maria Romero

Dirección/address: 779 Summer C

Número de teléfono/correo electrónico/Phone #/email:

-

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)..

Blake Shetter

Stand for Democracy

A lot of Money for Renting because
my job doesn't get that much
money. Thank you for helping
me.

Name/nombre: Ewardo

Dirección/address: 540 Surahoga St

Número de teléfono/correo electrónico/Phone #/email:

Creo que Suffolk Downs Debería/no debería...
I think that the Suffolk Downs project should(n't)..

Creo que Suffolk Downs no debería apoderarse
de East Boston, porque ellos nos van a desplazar
quieren hacer mucho dinero aquí y no debemos
permitírselos. -

Name/nombre: Alina Climaco

Dirección/address: 174 Falcon Apt. 1 East Boston, MA.

Número de teléno/correo electrónico/Phone #/email:

617-441-6757 alina.climaco@bt.com

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)..

se pondria Mas alta Reta y
mas carro en calle y mucho
trafico y mas alta Reta

Name/nombre: VICTOR SANTOS H

Dirección/address: 119 SUMMIT ST UNIT 123 C

Número de teléno/correo electrónico/Phone #/email:

Blake Shetter
Stand for Democracy

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)..

no quiero que esto se
aga porque no suban la
Renta ni los biles.
por Favor no

Name/nombre: MAX Ro castaneda

Dirección/address: _____

Número de teléno/correo electrónico/Phone #/email:

Blake Shetler
Stand for Democracy

Creo que Suffolk Downs Debería/no debería...
I think that the Suffolk Downs project should(n't)..

POR FAVOR que. no pongan
MUY. cara la RENTA A BESES
NO. ALCANSA para COMPRAR comida
Y LOS. BILIS. BIENEN. MUY caros
POR FAVOR que. Yano suban LA RENTA

Name/nombre: _____

MILAGRO ESCOBAR

Dirección/address: _____

Número de teléfono/correo electrónico/Phone #/email: _____

Creo que Suffolk Downs Deberia/no deberia...

I think that the Suffolk Downs project should(n't)..

Blake Shetter
Stand for Democ

No deberia estar por que No

tendriamos los recursos para
poder vivir dignamente

Name/nombre: Juana M Garcia

Dirección/address: 292 Spruce St Apt

Número de teléno/correo electrónico/Phone #/email:

Blake Shetter
Stand for Democracy

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)..

I don't agree because it's way
to much money just to buy a house
for only 4 people!

Name/nombre: Joel Armando Lazo

Dirección/address: 205 New Park St #3

Número de teléno/correo electrónico/Phone #/email:

Creo que Suffolk Downs Deberia/no deberia...

I think that the Suffolk Downs project should(n't)...

Blake Shetter
Stand for Democ

No quiero que hagan las cosas porque
habian mas caros y la renta seria mas
Cara y no gano lo suficiente.

Name/nombre: Ronald Lara

Dirección/address: _____

Número de teléno/correo electrónico/Phone #/email:

—

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)..

No debería estar por que no
tendria mas los recursos para
poder vivir ~~digna~~ dignamente.

Name/nombre: Oscar Martinez.

Dirección/address: 540 Saratoga St. East Boston. AP. 3

Número de teléno/correo electrónico/Phone #/email: 1 - 617 - 552 - 1111

Creo que Suffolk Downs Deberia/no deberia...

I think that the Suffolk Downs project should(n't)..

No debería estar porque No
tendríamos los recursos para
vivir dignamente

Name/nombre: Felipa Morte

Dirección/address: 200 Maverick St Apt

Número de teléno/correo electrónico/Phone #/email:

—

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)..

I think it is dumb to do this project because not only will this effect lots of ~~the~~ families but also put some families out which is ridiculous. Stop it now please.

Name/nombre: Andrew Dasilva

Dirección/address: 70 Pittsfield St, Revere

Número de teléfono/correo electrónico/Phone #/email:

Stand For
Democracy

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)...

No aceito: Porque vai ficar aumentar
transporte, preciso de Plan de saúde,
e a rent vai aumentar muito.

No aceito o projeto.

Name/nombre:

Marcia Nascimento

Dirección/address:

226 Bennington ST #2-E. Boston-MA

Número de teléno/correo electrónico/Phone #/email:

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)...

because the rent is
getting expensive

Name/nombre:

Siryi Garcia

Dirección/address:

74 Clark Ave Chelsea

Número de teléno/correo electrónico/Phone #/email:

QUE TENGAN MAS VIVIENDA COSTEABLE
QUE EL PORCENTAJE SEA DEL 20%
PARA LOS QUE YA VIVIMOS EN E-BOSTON.

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)..

I think Suffolk Downs Project should.

Create opportunity for low income families too that want to live in the Area Because of our kids Education is first.

Name/nombre:

Pablo Chavez

Dirección/address:

90 Grove St #2 Chelsea MA 02150

Número de teléfono/correo electrónico/Phone #/email:

Blake Shetter
Stand for Democracy

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)..

Não concordo por que a cidade vai ficar um caos. As pessoas ficaram prejudicada.

Name/nombre:

Jose Eduardo Lima

Dirección/address:

12 Magnolia Way #1233

Número de teléfono/correo electrónico/Phone #/email:

Creo que Suffolk Downs debería/no debería...

Nombre: Carlos Loza S

Dirección: 44 Lexington St 3 F. Boston ma 02128

Numero de teléfono/correo

electrónico: _____

COMENTARIO ATLAS

Creo que Suffolk Downs Debería/no debería...

I think that the Suffolk Downs project should(n't)...

I think Suffolk Down should
have some property for Low Income
families as well

Low Income family

Name/nombre: T Gerend

Dirección/address: 112 Beach St Malden

Número de teléfono/correo electrónico/Phone #/email:



Tim Czerwienski <tim.czerwienski@boston.gov>

PDA Suffolk Downs Further comment

stephen m

Mon, May 27, 2019 at 5:24 PM

To: tim.czerwienski@boston.gov

Cc: lydia.edwards@boston.gov, michelle.wu@boston.gov, althea.garrison@boston.gov, michael.f.flaherty@boston.gov, a.e.george@boston.gov, wburnews@wbur.org, felice.belman@globe.com, adrian.madaro@mahouse.gov, mayor@cityofboston.gov

Tim,

It was good to meet you the other night at Suffolk Downs, especially after having a long conversation with you previously about my questions and comments I put forward on the Suffolk Downs Development plan by way of HYM Investments. I write in opposing plan in its current state for a number of reasons, but most importantly we need much more time for this comment period.

Though, I have been a resident of East Boston for the last four years, this development plan was not on my radar nor was I informed of it, in fact I think the attempt to lure Amazon blurred my own understanding let alone the community of what the space was going to be developed into. As I said in the meeting, if it were not for Counselor Lydia Edward's organizing informational meetings I would not have heard about this, which is concerning since it is the largest development project to my knowledge in Boston's history, so it was only in March when I became aware of this project and have been working to learn more and more about the BPDA process.

As I asked whether there was ever a plan of this size and length for development put forward, you answered this is an unprecedented master plan for the BPDA to consider and I understand the comment period has been extended, first to my knowledge at the request of the Counselor and second by BPDA or HYM after the community meetings the Counselor organized. However, I am left to feel that we should hold on advancing the decisions even further, as I have spoken with residents in East Boston and friends in other parts of Boston proper as well as Chelsea, Lynn, and Revere all will be greatly impacted by this project. This also is including the necessary connection of the Blue Line to the Red Line, we as a community, city, and region need to have a much longer period of time to review and comment on this project. I am not sure how many comments have been entered or if that number is more than in the other projects. That being said I would like to know the length of the comment period on the Seaport or going back to the Prudential center. We have seen excessive development for housing for people that do not currently live in this city and that is in part making it much harder on low-income and long time residents to stay in this city. We need to determine how the city and state will manage the population growth, let alone the black boxes of information that the BPDA will have but the community does not have for transportation, we all want a well informed community that can effectively say yes or no to this project with confidence of knowing it all.

In terms of the developer (HYM) I was not impressed by Tom's (from HYM) expression that the hardship of this development plan has been on them for 2 years of meetings, Tom is quite well aware of the process, I believe he even worked for the BPDA. So, I honestly feel like he was trying to make HYM sound like a charity organization to do this project and in part to give in to the city's minimum requirements for affordable housing and not taking the high road and setting a higher number of

units. In addition, I am not convinced that Tom or HYM sees this as a way for the existing resident to stay in this community, that is because clearly 9,000+ units that are not income restricted on the entire property is going to be shifting the complete makeup of the neighborhood, is that something we want we need more time to determine that answer. Not to mention that the clear majority of rentals or housing in general are one bedroom apartments which pushes for a more transitional housing and less a community, which is not ideal for resident's that are building this community. We all know urban development is on the rise, this does not escape anyone, rentals have sky rocketed in Boston and every other city as well as large development projects, e.g. Manhattan's rail yard development project. We are a city and state that needs to build for the city that we are and not for the future residents of the city that have little to no connection, after all we are the current voting base and residents.

So, though I am more informed on many points, certainly not enough, than before March, this project's impact requires more time for review and comment. The burden is on the BPDA to consider asking the community how much time we need to review this before putting it to a board vote. A decision made too soon is going to impact the region for 20 years, and then some, when the housing and commercial spaces are completed. I understand there are other points for comments to be made, but let's get the first comment period done in a way to set an approach to development that involves more community direct involvement instead of just a step in a process that most are unfamiliar especially of this magnitude.

Thank you for taking to time to read my comments and questions. Looking forward to speaking with you again.

--

~stephen
he/him

 **pEpkey.asc**
2K



Tim Czerwienski <tim.czerwienski@boston.gov>

Friends of Belle Isle Marsh response to HYM development at Suffolk Downs

mary mitchell

To: Tim.Czerwienski@boston.gov

Tue, May 28, 2019 at 8:22 PM

May 24, 2019

Director Brian Golden

Boston Planning and Development Agency

One City Hall Plaza, 9th Floor

Boston Ma. 02201

Re: Suffolk Downs Project at [525 William McClellan Highway](#)

The proposed HYM project at the Suffolk Downs property will have an enormous impact on the whole East Boston, Revere, Winthrop and Chelsea communities. The density, traffic, and huge increase in use of local services will change the culture of the area as we all know it today. HYM must appreciate this.

One of the largest and perhaps most potentially damaging impact, (although perhaps not intentional) of this project will be on the habitat, wildlife and birds calling The Belle Isle Marsh home. HYM has presented the Belle Isle Marsh Reservations as an asset to their project. But do they understand that increased visitors, dog walkers, bike riders, traffic, glass windows, etc. will have a detrimental impact on the habitat of this IBA and ACEC protected property as it exists today. Salt marshes are among the most biologically productive ecosystems on earth and play an important role in filtering out nutrients. Salt marshes serve as critical habitat for a host of important animal species including fish, shellfish, mammals and birds. We need to plan for the changes and HYM must take responsibility for its part and help a plan move forward.

Independent study of the effects of Climate Change on the Belle Isle Marsh: The Friends of Belle Isle Marsh are requesting that an independent study be completed and publically shares as an immediate next step to help understand the effects of climate change on the salt marsh as a whole. There has been some talk about building berms to protect HYM properties, but will this be harmful to the salt marsh itself and the other abutting communities? It is critical that FBIM and HYM have the best information available to work to preserve this very important ecosystem. It is unacceptable to allow development within an ACEC if that development could potentially degrade the saltmarsh.

Wildlife Assessment: FBIM would like HYM to complete a wildlife assessment of their property. This area is a major migratory bird flight path. How will their project affect these important yearly events. How will lighting, windows and building heights affect the birds?

Visitor impact study: The impacts of so many new neighbors will have a dramatic impact on the effective and safe running of the reservation. We need to ensure that visitors find the park safe and inviting at the same time as we protect and preserve the natural habitats. HYM should complete a study to assess the impacts of thousands of new residents will have on this 240 acre green space. What will the staffing needs be? What impact will the visitors have on current infrastructure? How will habitats best be protected?

Partners in Advocacy: We would like HYM help us advocate that the Reservation to become a **No Dog** DCR property. HYM should commit to build the three outside, accessible dog parks that they have mentioned at public meetings on their property

Nature Center: Increased use by thousands of new neighbors will impact the reservation as it exists today. Planning for a nature center equipped with bathrooms, classrooms space, ranger office would be necessary for security, preservation, and educational purposes. We already have a team working on architectural plans for such a center. We would like HYM to join our partnership and build the nature center.

Nature Trails: Connectivity between communities is important to the reservations. There are already plans to continue the East Boston Greenway into the park and Winthrop. We also need to continue pathways and boardwalks within the park to help people view and enjoy the reservation but keep them from degrading critical habitat. The Lawn Avenue boardwalk to the Main Reservation on Bennington Street is critically needed to provide for movement through the reservation from the greenway. We need HYM to support and contribute to the development of these projects as well.

Land Acquisitions: The Belle Isle Boat Yard and the Casket Company properties should be procured to further protect the marsh from further development. These properties could provide increased wetlands that would help mitigate the effects of increased tides.

Storm Water Plan Clarification: We would like the storm water plan clarified. Storm water being released into Belle Isle Marsh is unacceptable.

Reassessment of the Self Regulating Tidegate: Is it working properly and is properly for the protection and preservation of the salt marsh in Belle Isle and on the HYM property.

Delineation of HYM Open Space Plan: FBIM would like to see specific plans for the 40 acres of green space planned for the HYM development.

Thank you very much. We look forward to working with you in the future.

Mary Mitchell, President of The Friends of Belle Isle Marsh.

May 28, 2019

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

Dear Mr. Czerwienski,

I am contacting you to express my support for the HYM plan to redevelop the Suffolk Downs site and I am looking forward to the day when construction begins so we can start to see the benefits this project will bring to the community.

I am impressed with HYM's transparency and I am confident that HYM will continue to stand behind its commitments as the project is constructed over the next 20 years.

Thank you,

Derek J. Brodin

69 Waldemar Avenue
East Boston, MA 02128

May 28, 2019

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

Dear Mr. Czerwienski,

I am contacting you to express my support for the HYM plan to redevelop the Suffolk Downs site and I am looking forward to the day when construction begins so we can start to see the benefits this project will bring to the community.

I am impressed with HYM's transparency and I am confident that HYM will continue to stand behind its commitments as the project is constructed over the next 20 years.

Thank you



Pasquale Todisco III, President
Todisco Services Inc.



Tim Czerwienski <tim.czerwienski@boston.gov>

Suffolk Downs PDA comments - due May 31

Lisa Jacobson

Wed, May 29, 2019 at 8:54 PM

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

Tim,

Thank you for the opportunity comment on Suffolk Downs/HYM's proposed PDA.

I have several issues with the PDA, namely in the areas of transportation, housing, civic space, and open space.

Transportation

- Transportation should be centered around people, not parking or cars.
- **HYM's overall investment in transportation should demonstrate that it is providing the infrastructure and service needed to meet Go Boston 2030's goals of transit ridership at 44% and single-occupancy vehicle use to 20%.** HYM should model what they are proposing to show whether or not it expects to meet the 2030 goals.
- **Parking:** HYM should not build as much parking as proposed, which currently exceeds the number of spaces under City of Boston parking ratios. For example, HYM is proposing twice the City of Boston ratio for office/lab space. Providing more parking will induce more driving. HYM should lower its parking ratios, as the site is transit-oriented. Similar to Assembly Row, HYM should price parking on-street and provide discounted parking off-street to encourage on-street availability.
- **Roadways:** Expanding Route 1A is counter to the City's and region's climate and resiliency goals. HYM is proposing to expand Route 1A's capacity by 57%. Instead of creating a "super street", HYM should reconsider Route 1A as a multi-modal corridor with southbound dedicated bus lanes (as identified in the SID), and protected, dedicated space for pedestrians and cyclists. Route 1A should also include safe and accessible crossings for people on foot and on bike.
- **MBTA Blue Line:** HYM should invest in Blue Line signal upgrades and additional cars to add capacity to the Blue Line. Some of the cars should be high capacity cars, similar to the "Big Red" cars in use on the Red Line to accommodate more people.
- **HYM shuttles:** HYM's proposal to run a publicly accessible shuttle around the site, and shuttles to sites like North Station and South Station, HYM needs to provide more information about how often the services would run, how many years HYM commits to operating these services, what the capacity of the services will be, and how accessibility and seamlessness within the MBTA systems will be ensured. The shuttle buses should be battery electric buses or similar to minimize air pollution in East Boston and to HYM residents and visitors.
- **Red-Blue Connector:** HYM should support connectivity for Blue Line riders by providing a minimum of \$15 million towards the planning and construction of the Red/Blue connector for the MBTA.
- **Greenway:** HYM should commit to building the East Boston Greenway extension from Constitution Beach to Revere Beach, using the current design and quality standards as exhibited on the existing Greenway. HYM should build a greenway connection under Saratoga Street.

Housing

The City of Boston has committed to increasing its supply of affordable housing and although the inclusionary policy requires 13% affordability, the inclusionary policy is far from appropriate for a site this size. A site this size which is requesting the type of density that is being requested here will not be economically diverse if it only builds 13% of its housing stock to serve households at or below 70% of Area

Median Income for the Greater Boston MSA. Instead, it will miss out on the opportunity to truly create a welcoming community that is affordable to a more representative group of households from across the greater Boston Area. The new neighborhood at Suffolk Downs should provide income-based housing at multiple levels that is affordable to households who are:

- At or below 30% AMI
- At or below 50% AMI
- At or below 70% AMI
- At or below 80% AMI
- At or below 100% AMI

The City should examine the housing targets in its report, Housing A Changing City Boston 2030 and ensure that there are provisions to include elements of all types of housing discussed in that plan at Suffolk Downs, which is going to double the size of East Boston by the time it is fully built out. There should be Senior Housing, Workforce Housing, and Low Income Housing in addition to the market rate housing on site.

Civic Space

- HYM should commit to building a Boston Public School on-site, which is a needed facility in East Boston.
- HYM should commit to funding an ambulance and additional fire department capacity.
- Part of what makes an urban neighborhood a thriving place to live that serves a diverse group of households is that most neighborhoods host non-profits and civic minded organizations in addition to public spaces, public agencies, and private enterprise. The HYM proposal should include a percentage of its commercial and retail space that will be discounted and offered to non-profits that serve East Boston, and greater Boston. Examples would include:
 - Spaces that are offered at below market rent for daycares, afterschool programs, and youth programming in general that serve children from a broad range of incomes, including low income families.
 - Spaces that are offered at below market rent for agencies that serve seniors, disabled populations, and veterans
 - Office space for non-profits that is offered at a discounted rent
 - Program space for non-profits that is offered at a discounted rent
 - Office and program space for municipal and state agencies to lease at stable, below market rents so that residents can access the services these public agencies provide at a transit oriented site within Boston.
- This type of discounted retail and commercial space should be built into every phase of the development, and should be required and written into the commercial and retail permitting in the same way that the affordable housing requirements are written into the permitting.

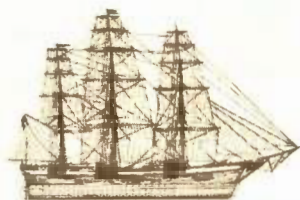
Open Space

- City of Boston Parks Department states "it is not clear how the open space acreage proposed for the project is being counted, how the investment is being valued, or how this open space will serve the active recreational needs of up to 10,000 households"
 - How much open space is needed for 10,000 households? HYM should complete a needs analysis and impact assessment to estimate the demand for the space.
 - East Boston is underserved by public open space for active recreation, with a ratio of 1.31 acres per 1000 residents of parks, playgrounds, and fields. The City of Boston averages 3.24 acres per 1000 residents. HYM should provide at least three multi-use/soccer fields, four ball fields, four basketball courts, three tennis courts, and five playgrounds.

- Open space should be open to all members of the public, 24 hours a day, 7 days a week, 365 days a year. Open space should be created in perpetuity.
- All open space should be implemented in the first phase of development.

I hope HYM modifies its proposal and its investments in the community to help the City of Boston and region meet its climate and equity goals.

Lisa Jacobson
[218 Everett Street](#)
[Boston MA 02128](#)



EBCDC, INC.

May 29, 2019

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

Dear Mr. Czerwienski,

I'm reaching out to express my support for the Suffolk Downs Master Plan PDA and PDA Development Plan submission. As you know, the EBCDC, Inc. (East Boston Community Development Corporation) is a non-profit dedicated to enhancing the life of low-income residents of East Boston through economic development activities. East Boston CDC has been following the Suffolk Downs project since its initial project filings in 2017 by the project proponent, the HYM Investment Group.

The HYM team's community engagement has been extensive and thorough, as they have made themselves available to regularly meet with the community to discuss a variety of topics, such as affordable housing and job creation. HYM's proposed development program at Suffolk Downs provides our community with much needed housing, with over 7,000 units in Boston alone and 10,000 units across the entire site. Further, HYM has confirmed they are complying with the Mayor's 13% IDP requirement, which will create over 900 affordable housing units in East Boston at a time when there is displacement happening in many East Boston neighborhoods. Most importantly, HYM's proposal creates all of these new housing units without displacing anyone, as the Suffolk Downs site is very much underutilized with only empty parking lots and a soon to be closed horse racing facility.

We would also encourage HYM to consider the creation of a housing stabilization fund to benefit East Boston neighborhoods. This fund could be used to either stabilize existing affordable housing or potentially acquire existing housing stock for the creation of new affordable housing units. We believe such a fund is the most cost-effective way to stabilize or create additional affordable units, especially if HYM were to make this contribution upon the approval of permits for the Suffolk Downs master plan. For this type of fund, HYM could benefit from teaming with local partners such as East Boston CDC.

The combination of new affordable housing opportunities at the Suffolk Downs site and the protection of affordable housing within the East Boston neighborhoods is a winning formula for East Boston, and a proposal which EBCDC, Inc. enthusiastically endorses.

Respectfully,

A handwritten signature in blue ink, appearing to read "Albert F. Caldarelli", with a stylized flourish at the end.

Albert F. Caldarelli

EBCDC, Inc.
President-Executive Director



East Boston Chamber of Commerce

East Boston Chamber of Commerce

175 McClellan Highway
East Boston, MA 02128
617-569-5000

contact@eastbostonchamber.com

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Margaret Farmer

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GoingClear Interactive

Kathy Orlando
Sulprizio Real State

Vinny Qualtieri
NOAH

Jose Torres
La Cancun

Amanda Donis
East Boston Academy & Supply

Joe Ruggiero Jr.
Ruggiero Family Memorial
Home

Buddy Mangini
Past President

May 29, 2019

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

Dear Mr. Czerwienski,

As President of the East Boston Chamber of Commerce, I am contacting you to express my support for the HYM plan to redevelop the Suffolk Downs site. The Chamber is looking forward to the day when construction begins so we can start to see the benefits this project will bring to the community and local businesses.

I am impressed with HYM's transparency and I am confident that HYM will continue to stand behind its commitments as the project is constructed over the next 20 years.

Thank you,

Jim Kearney

President



May 29, 2019

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

Dear Mr. Czerwienski,

This letter expresses my full support to the outstanding development plan at the Suffolk Downs by HYM. I have been around the community of Suffolk Downs as a resident and community activist for 26 years so I can attest to the great benefits of HYM's proposal and their legitimate interest in promoting the local residents and businesses.

As the President of one of the largest Latino festivals in Boston, I have full confidence and trust on all HYM proceedings leading to this promising project. I am glad to see this expansion of affordable housing and business opportunities in the area, and I will continue to support HYM and their mission to improve my community.

If you have any questions or concerns about this message, please don't hesitate to reach out to me. My direct cell phone number is

Respectfully,

Alejandro Magno
President
www.festivalcolombianoboston.com

May 29, 2019

Mr. Tim Czerwienski
Project Manager
Boston Planning & Redevelopment Agency
One City Hall Square, Floor 9
Boston, MA 02201

Dear Mr. Czerwienski,

I am writing this letter of support for the HYM plan to redevelop Suffolk Downs. As an AIG member, I have been impressed with the respectful and collaborative method in which HYM has engaged with our community. They have not only listened to, but acted upon recommendations made by residents to mitigate the impact of such an expansive development within our neighborhood. They have reconfigured designs to accommodate abutters and have worked with all segments of East Boston to solicit feedback. They have acted in good faith throughout the process.

I am looking forward to seeing construction begin soon and with it the realization of new employment opportunities for those in the building trades. I am also excited to see the benefits this will bring to neighboring communities with added housing, green space, employment opportunities and commercial establishments.

I have confidence that HYM will continue to work closely with East Boston and Revere to transform a wasteland of tar and cement into a thriving and welcoming community for all.

Sincerely,

Debra L. Cave



May 29 13, 2019

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

Subject: HYM/Suffolk Downs Redevelopment Project Approval

Dear Mr. Czerwienski:

I have been actively involved in many large-scale, public policy dependent projects and issues involving the East Boston community since 1970, including a term as the community's Little City Hall Manager. During this half century I have not encountered any proposed development project which has the potential to enhance East Boston's quality of life as does the HYM plan to redevelop the Suffolk Downs site and strongly urge the Boston Planning and Development Agency to expedite its approval of this hugely important property. I have been very impressed with HYM's transparency with East Boston, including numerous neighborhood outreach meetings far exceeding those required by Article 80. HYM has been involved in an extensive and transparent public outreach program, touching base with every conceivable neighborhood and social organization.

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

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

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

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

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

potential flooding impacts associated with sea-level rise, and to provide further protection to the nearby buildings and areas outside the project site.

I am convinced that HYM will stand behind its Suffolk Downs commitments during the project's twenty year construction period and urge the Boston Planning and Development Agency to proceed immediately with the project's approval.

Thank You,

John Vitagliano

Former Boston Transportation Department Commissioner

attachment:

Vacant Suffolk Downs Site





May 30, 2019

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

Re: MyRWA Comments on Suffolk Downs Redevelopment PDA

Dear Mr. Czerwienski:

Thank you for the opportunity to comment on the largest single redevelopment project in the Mystic River Watershed, which spans 21 municipalities from Reading through Revere. The Mystic River Watershed Association (MyRWA), was founded in 1972 to protect and restore the river, its tributaries, and watershed lands for the benefit of present and future generations. We provided detailed comments on the DEIR/DPIR in December 2018 and will not repeat them here. After reviewing subsequent materials, we want to emphasize the following few points.

As described in detail in project documents and elsewhere, the Suffolk Downs site, like Boston's Seaport District, is highly prone to climate change exacerbated coastal flooding (see Figure 1 on page 2). Unlike the Seaport District, all the planning and permitting for this site is taking place post-Superstorm Sandy and Climate Ready Boston. Also unlike the Seaport, this site is being redeveloped by a single entity with a twenty-year build-out plan.

Given both these factors, it would be irresponsible for this project not to include, up front, the long-term means to protect itself and its surrounding neighborhood from coastal flooding. This would require a coastal flood barrier stretching from the east side of Constitution Beach in East Boston across the landward edge of Belle Isle Marsh out to Winthrop Parkway. Such a barrier, which should include such multiple benefits as a bike path and/or improved coastal habitat, is essential to protecting the MBTA Blue Line, Bennington Street, the Suffolk Downs site itself, and several existing residential neighborhoods.

We ask that a condition of this permit approval be a legally binding MOU among HYM, state landowners (Massport, MBTA and Mass DCR), Boston and Revere that commits these entities to the planning and construction of such a barrier. This would be an excellent opportunity to use an innovative tool such as District Improvement Financing, whereby the state could use its bonding authority to finance such a flood barrier, to be repaid through property taxes generated by the Suffolk Downs development.

Thank you for the opportunity to comment on the largest development in the Mystic River Watershed. We look forward to working with HYM and its host communities to create a thriving, climate-prepared, new neighborhood. Please do not hesitate to contact us with questions or comments at
or

Sincerely,

A handwritten signature in black ink that reads "Patrick Herron".

Patrick Herron
Executive Director

A handwritten signature in black ink that reads "Julie Wormser".

Julie Wormser
Deputy Director

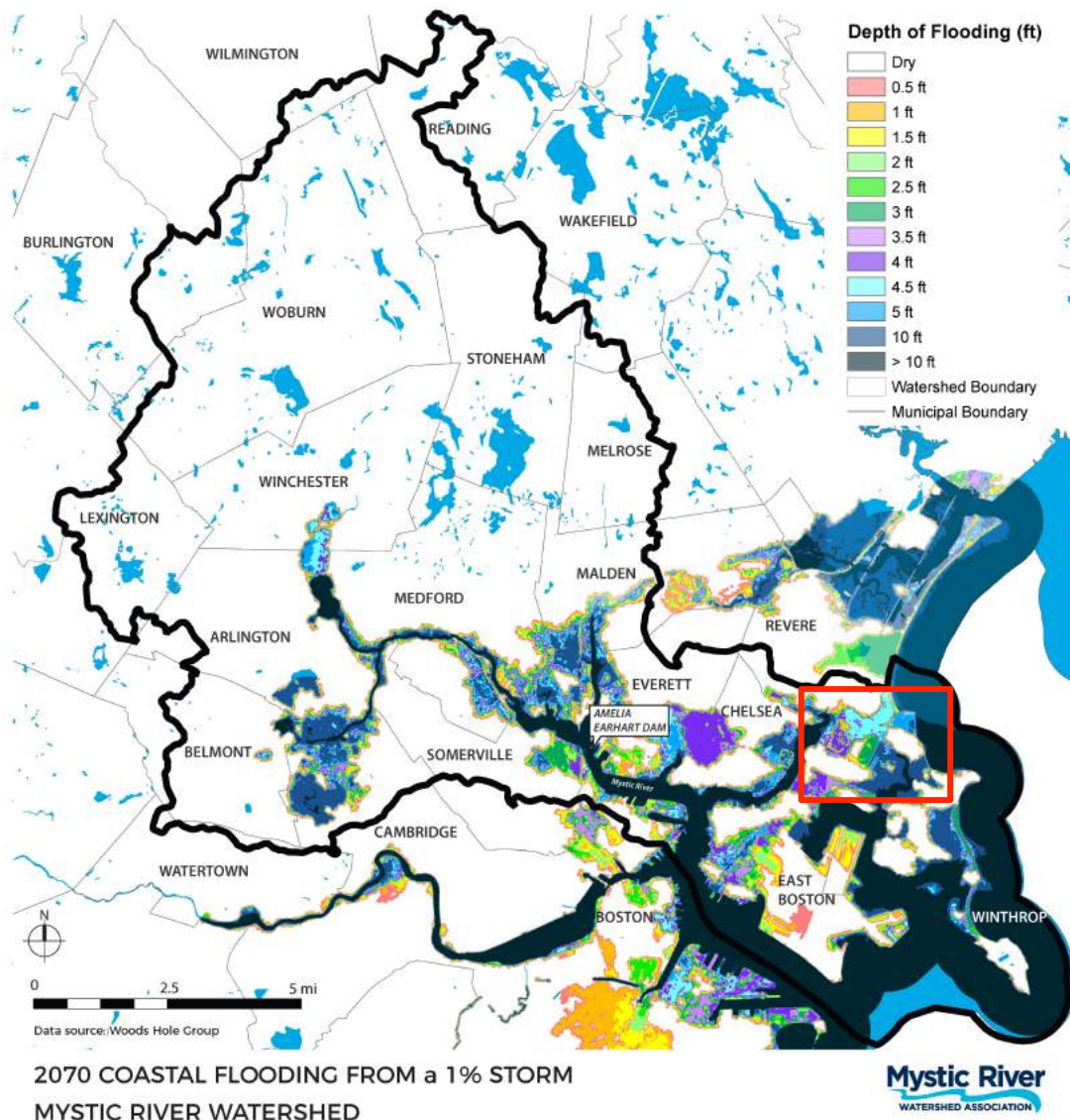


Figure 1. This map series show the depths of flooding for the 1% storm in 2070. In addition to flooding via Belle Isle Marsh, there are two other flood pathways: Revere Beach and Chelsea Creek. The datasets are derived from the Boston Harbor Flood Risk Model (BH-FRM) for sea level rise and coastal storm simulations. Data provided by Woods Hole Group.



Tim Czerwienski <tim.czerwienski@boston.gov>

Comment on Suffolk Downs—525 William F. McClellan Highway

Rickie Harvey

Thu, May 30, 2019 at 9:34 PM

To: tim.czerwienski@boston.gov

Cc: John Dalzell <john.dalzell@boston.gov>

Dear Mr. Czerwienski,

I am writing on behalf of the [Boston Clean Energy Coalition](#) in regard to the current plans for Suffolk Downs.

As you are aware, the Carbon Free Boston Summary Report that was released earlier this year calls for all new construction in Boston to be net-zero carbon or we will not meet Mayor Walsh's goal of being a carbon neutral city by 2050. Consequently, when a project of this tremendous size plans to use gas for just over 50 percent of its projected energy consumption, it is totally out of line with the goals set by the City and does not address the move away from fossil fuels that the BPDA must insist on if Boston is to have any chance of reducing our GHG emissions by 2050. This project should be entirely electric; if it is not, it will just have to be retrofitted in the near future at a much higher cost than were it built to that standard at the outset.

Seen through the lens of Carbon Free Boston and what needs to be accomplished by the current generation of buildings being constructed, there are several areas where the BPDA can and should press for further commitments from HYM and its development team:

The energy savings that are laid out in the Supplemental Information Document dated May 1, 2019, reference current codes, which we know will be more stringent by the time the buildings are actually constructed a number of years hence. So the representation of energy savings in broad ranges is not nearly ambitious enough. The BPDA should insist on further improvement to these energy savings commitments.

The developer states that they will reach 2 megawatts of solar energy but no time frame is stated for this achievement. Sooner would be better than later, and the BPDA should secure a short time frame for this to be accomplished.

The multi-family residential Passive House that is scheduled to be built in Phase 1B is a positive for this project and the city. And while the stated commitment to PH standards for the limited single-family houses and townhomes in later phases is a nice gesture, the BPDA should insist that there be multi-family PH in *every* phase of this project, not just the first.

Thank you for your attention to these crucial elements of addressing climate change in our built environment *now*, in regard to *this* project, and not putting them off for later, when it will be too late.

Rickie Harvey
Boston resident

On behalf of the Boston Clean Energy Coalition

Members

350 Mass—Boston Node

Back Bay Green

Boston Climate Action Network

Clean Water Action

Environment Massachusetts

Home Energy Efficiency Team (HEET)

Massachusetts Climate Action Network

Mothers Out Front, Boston

Resist the Pipeline

Sierra Club of Massachusetts

5/31/2019

City of Boston Mail - Comment on Suffolk Downs—525 William F. McClellan Highway

Toxics Action Center

West Roxbury Saves Energy

May 30, 2019

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

Re: Suffolk Downs Project – via email c/o Mr. Tim Czerwinski

Dear Director Golden:

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

We have reviewed project documents, most recently the draft Planned Development Area agreement and the Supplemental Response to Comments. We have also attended project meetings held by BPDA and workshops convened by Councilor Lydia Edwards.

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

We support the request by Right to the City Boston, GreenRoots and others that BPDA slow down the review process in order to substantially address these serious unresolved issues for the good of Boston families and our East Boston neighbors.

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

Our recommended steps for proceeding are listed below in Section 1.0.

A Suffolk Downs project can be a model for equitable and sustainable development, exceeding minimum City requirements to meaningfully address critical issues of housing affordability and displacement, transit, climate change and East Boston neighborhood direct impacts. The City should not now advance preemptively to project final consideration but take the time needed to fully achieve these ends.

Thank you for BPDA's work on this project and for considering issues detailed by all individuals, organizations and officials commenting.

Sincerely
Allandale Coalition
FoAW Coalition

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

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

Significant issues remain unresolved for the Suffolk Downs proposed development.

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

At this stage, we recommend that unresolved issues be addressed in an amended Draft Project Impact Report and revised draft PDA agreement, prepared after direct discussions among officials, agencies, public stakeholders and the proponent.

These direct discussions should not be open-ended, but may take 3-6 months, given the scale and 50+ year lifetime of proposed development and the significant financial and technical elements involved.

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

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

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

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

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

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

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

Project Labor Agreement and Future Site Operation Union Status

A Project Labor Agreement is a key component of the proposed project, although outside City’s formal review steps. We support efforts by union leadership and rank-and-file to secure a satisfactory Project Labor Agreement. Whether eligible workers may be union members at the site once operating remains undetermined.

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

1.2 Summary of Significant Unresolved Issues

Significant unresolved project issues include the following:

1. Affordable housing; project should include substantially more than 13% of total units as now proposed.
2. Substantially inaccurate measure of housing affordability; “affordability” should be based on weighted blend of citywide and East Boston household income.
3. Inadequate analysis of existing and cumulative housing displacement impacts; absence of a displacement mitigation program.
4. Inadequate provision for an equity-building program to benefit qualified renters.
5. Incomplete evaluation of how project will affirmatively further fair housing goals.
6. Insufficient discussion and enforceable commitment to meaningful job training and a project contractor and sub-contractor advancement program, especially for local residents, firms and qualified women and minority owned enterprises.
7. Project energy program does not achieve City net carbon zero goals.
8. Excess reliance on private vehicles; incomplete public transit program.
9. Incomplete assessment and mitigation for local traffic impacts.
10. Overreliance on engineered systems to address climate change risk, to the detriment of on-site and regional natural systems; no environmental justice / climate justice analysis; project lifetime should be year 2100 for climate analysis.
11. Insufficient clarity and specificity on impacts from flood and sea level rise on project-site serving infrastructure such as Route 1A and MBTA Blue Line.
12. Incomplete and inadequate detail regarding on-site open space, including permanent dedication via conservation restriction (for example) and provision of right of free speech and assembly within public spaces.
13. Insufficient analysis of project impacts on Belle Isle Marsh and associated Areas of Critical Environmental Concern.
14. Incomplete assessment of net public benefits, with need to more accurately differentiate between required project elements and benefits that offset impacts; an independently administered public benefit fund must be established.
15. Inadequate information on post-project approval site interim uses, site governance (Owners Association) and possible post-approval property sale.
16. Reliance by proponent on claim of financial constraints (“the numbers don’t work”) without reasonable disclosure of sufficient data to test accuracy of claims.

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

1.3 Summary of Significant Process Deficiencies

In addition to substantially incomplete project materials, the project review process has been deficient such that a finding of net public benefit cannot yet be supported.

These project review issues include most consequentially:

1. “Moving Target” project description, where-in documents released for review do not fully describe all relevant project elements.
2. Multiple supplementary agreements and on-going parallel negotiations are not fully disclosed in draft or final document form enabling comprehensive public review and comment.
3. Scheduling conflicts for project meetings: Civic Design Review meetings held downtown on days/times when project meetings are scheduled in East Boston; Design Review meetings not posted on BPDA project web site.
4. Significant project elements proposed for relegation to a future time post-approval, preventing officials, agencies and the public opportunity full review of all relevant project elements prior to Board approval.
5. Failure to provide independent technical advisory services to residents, whose layperson local knowledge is uniquely valuable but may not be readily translated into terms presented by project consultants and specialists.

In addition to these project-specific process flaws, City and BPDA policies and project review steps have themselves serious systemic deficiencies.

These are listed separately in Section 5.0.

Suffolk Downs Development Proposal
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2.0 Suffolk Downs: Affordable Housing and Displacement

Housing displacement and affordability are critical, priority issues in East Boston and residential neighborhoods throughout the City of Boston.

The project as currently proposed falls far short of providing sufficient affordable housing to address East Boston and City need. Project materials do not include necessary analysis of housing displacement in East Boston; a displacement mitigation plan is required.

Proponent's statement that "the numbers don't work" for greater than 13% affordable has not been substantiated by public evidence. At minimum, the City and proponent should enter into confidentially protected negotiation to test the accuracy of this key assertion. Local elected officials should participate in this evaluation.

The 13% level of affordability via an Inclusionary Development Policy is an arbitrary Mayoral directive (as are linkage payments). IDP and linkage requirements can be adjusted during project negotiation. Possible solutions for housing affordability and displacement to be evaluated during the next phase of direct discussion might include:

1. Increase in affordable housing financing on determination of "reasonable return" to proponent investor group after evaluation of project's actual pro-forma.
2. Tax and permit fee reduction agreement to fund additional affordable housing and a displacement mitigation program.
3. Housing bond to monetize future tax revenue into present day funding pool.
4. Convert on-site and/or off-site infrastructure improvements into housing fund, with public agencies responsible funding public infrastructure improvements.
5. Partner with affordable housing NGO(s) to access additional affordable housing funding and potentially available investment tax credits.
6. Create PILOT fund dedicated to affordable housing, with voluntary PILOT participation by institutions as demonstration of effectiveness.
7. Equity-building program for qualified renters. Significant net worth disparities exist among Americans; housing equity is a basic step to build family wealth.
8. Assessment of whether on site or off site affordable housing is more cost-effective, while considering adverse impacts of reduced on-site income mix of residents.

NOTE 1: FoAW Coalition position is that site housing should be 70% locally affordable, 30% market rate, union labor for construction and operation and local job creation benefitting from site proximity to airport and downtown Boston, with site and regional climate resilience achieved by greater reliance on natural systems. This approach would involve a fundamentally different development model, likely requiring market value buy out of current ownership.

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Suffolk Downs Development Proposal
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3.1 Suffolk Downs: Energy Use and Carbon Free Boston

As currently proposed the project does not make sufficient, enforceable commitments towards achieving the City’s carbon neutral goals.

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

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

Subsequent project documents should include the following Carbon Free analysis:

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

Energy Use and Carbon Free Boston Background

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

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

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

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

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

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Suffolk Downs Development Proposal
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3.1 Suffolk Downs: Energy Use and Carbon Free Boston cont.

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

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

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

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

- all single-family homes (12 in total) and all townhomes (22 in total) will be Passive House and/or E+ (energy Positive) equivalent.
- commitment to construct one (1) Passive House (or equivalent) demonstration project of a minimum 50,000 square foot multi-family residential building, moved to Phase 1B from Phase 2B
- commitment to install a minimum of 2MW of solar on-site.
- all buildings throughout the development will be solar-ready.

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

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

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

Final recommended Carbon Free compliance should be determined through direct discussions among officials, agencies, public stakeholders and the proponent.

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Suffolk Downs Development Proposal
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3.2 Suffolk Downs: Transportation

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

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

For the Suffolk Downs project, increased traffic, congestion, air quality and safety issues must be addressed through a comprehensive transportation plan, transitioning away from private vehicle reliance towards public transit, bicycle, pedestrian and safe, low-impact alternative modes. This sustainability goal is expressed in the City's 2030 "Mode Share" 48% target. (NOTE: This target should be rounded up to 50%).

The project Supplemental Information Document states:

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

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

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

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

Subsequent transportation program specifics should provide a comprehensive discussion of how the City's target Mode Share will be achieved. These steps should be included in the Transportation Agreement portion of the overall project agreement document set prepared for BPDA Board consideration.

If proponent indicates that the Mode Share target cannot be achieved, the reasons for this projected shortfall should be stated in detail and subject to critical evaluation during direct project review among officials, agencies, public stakeholders and the proponent. The Transportation Working Group must meet only in public sessions.

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

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Suffolk Downs Development Proposal
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3.2 Suffolk Downs: Transportation cont.

WBZ News Boston : May 14, 2019

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

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

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

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

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

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

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

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

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

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

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

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

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

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

4.1 Suffolk Downs: Climate Change & Natural Resources

The Suffolk Downs site is within the City’s highest risk zone for sea level rise due to climate change. East Boston neighborhood as a whole is among City neighborhoods most at risk due from sea level rise. Additionally, Belle Isle Marsh, one of the state’s most significant coastal natural areas, will be seriously harmed by climate change.

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

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

To evaluate flood and climate change risk, the proponent conducted iterative modeling of 22 future risk scenarios. Such extensive modeling has merit, although as presented in project documents, the volume of technical detail ultimately obscures critical climate change issues rather than clarifying them.

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

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

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

1. Use 2070 and 2100 as the planning horizon years
2. Identify key climate variables chosen as the basis for site design
3. Discuss rationale for selecting these key climate variables
4. Identify menu of resiliency measures selected
5. Discuss rationale for selecting these resiliency measures
6. Show by map flood risk for baseline and post-project for site and district

Exhibit A.1 below illustrates this methodology.

Exhibit A.1 consists of two map examples: Figure 8.4 from project’s Draft Project Impact Report and City of Boston projected flood risk at year 2070 and 1% event.

Figure 8.4 shows FEMA current risk areas and a revised 100-year risk area based on proponent modeling: a before and after mapping. (*DPIR, VII at 8.7.1*)

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

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

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**Suffolk Downs Development Proposal
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4.1 Suffolk Downs: Climate Change & Natural Resources

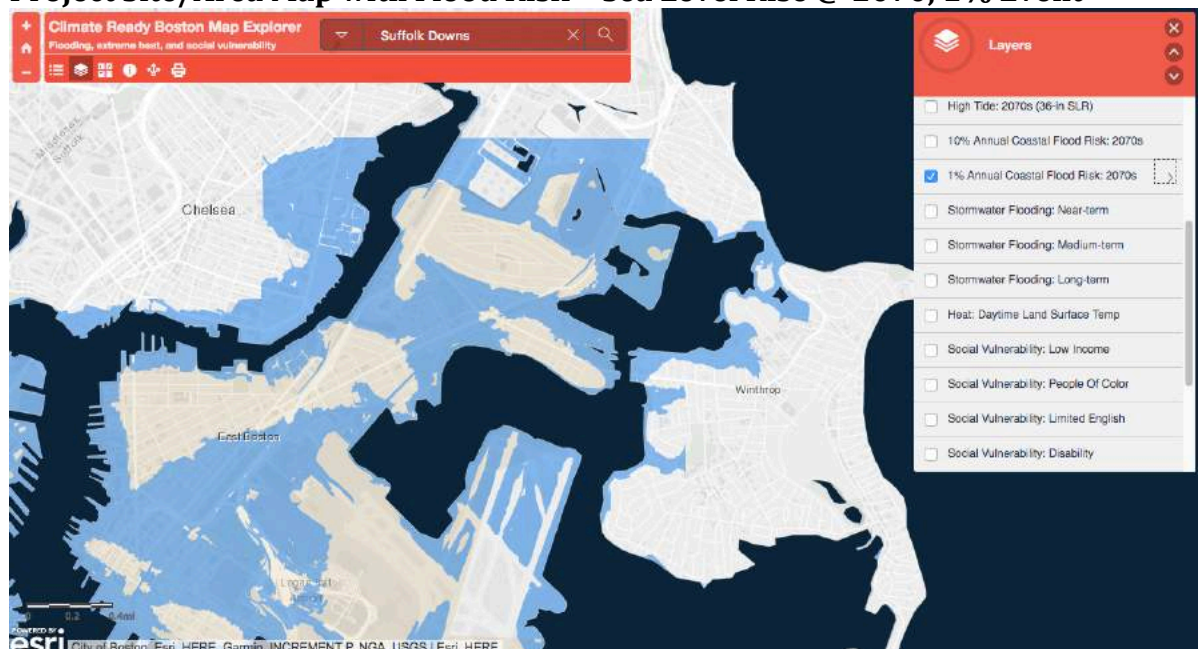
**Exhibit A.1
Flood Risk Mapping Examples**

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



Draft Project Impact Report: Figure 8.4

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



Climate Ready Boston Map Explorer

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

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

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

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

Suffolk Downs site is within the City’s highest risk zone for sea level rise due to climate change: an estimated 19.5 ft sea level rise - base flood elevation. For millennia, the site was saltwater marsh and open water much like Belle Isle. Despite fill in the early 20th century, significant natural resources remain on site, most prominently the Sales Creek Area of Critical Environmental Concern, together with wetlands and mature trees.

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

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

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

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

Suffolk Downs building program and engineered stormwater and flood risk systems should not impair current and future health of Belle Isle Marsh. Alternative project site configuration and project area strategies can provide mitigation of this adverse impact.

If the building program and associated systems may harm the Marsh, this harm should be acknowledged in project documents and understood as a consequence of project approval.

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

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

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

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

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

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

Source: National Park Service, National Seashore, Massachusetts

<https://www.nps.gov/caco/learn/nature/estuaries-and-salt-marshes.htm>



Belle Isle Marsh. Photo by Danielle Walquist Lynch

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

4.2 Suffolk Downs: Climate Change and Sea Level Rise

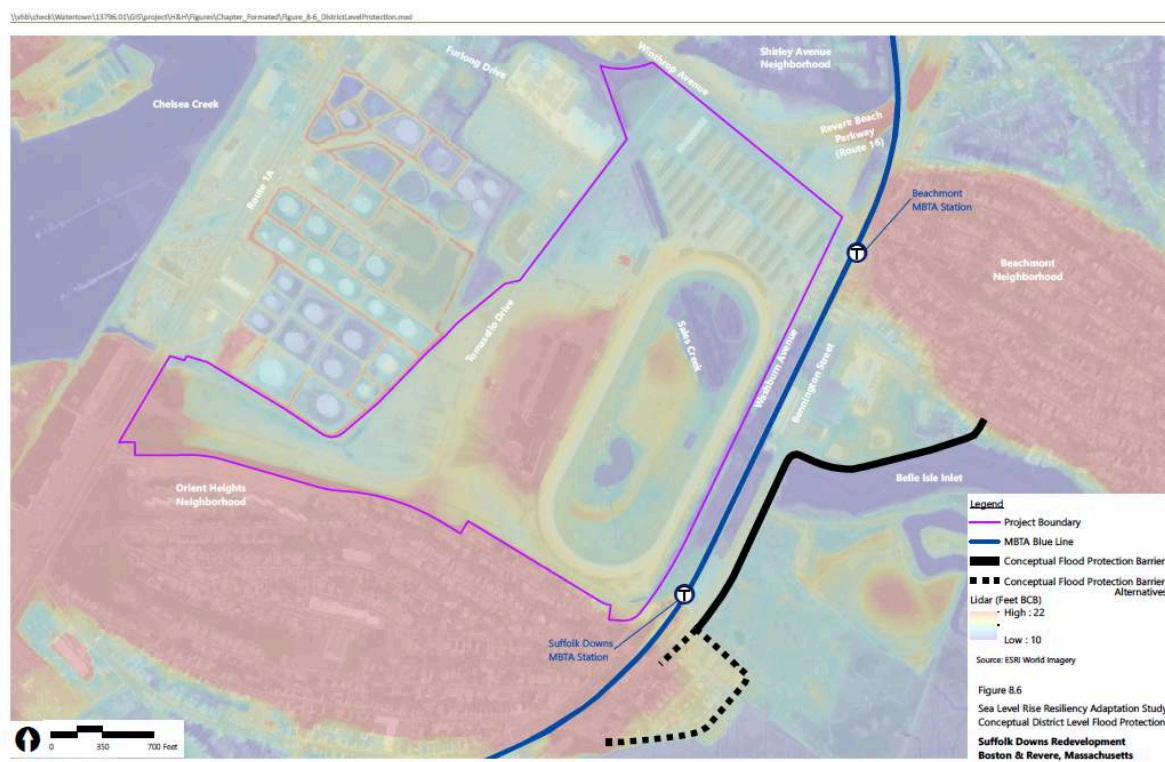
Exhibit B Flood Protection Barrier Option

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

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

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

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



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

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

**Exhibit C
Salt Marsh Migration Option**

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

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

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



source: BPDA Climate Ready Boston: Resilient Boston Harbor

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Suffolk Downs Development Proposal
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4.3 Suffolk Downs: Impacts at Belle Isle Marsh

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

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

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

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

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

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

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

Sales Creek flow diversions require adequate analysis, due to the critical ecological significance of Sales Creek and Belle Isle Marsh. Understanding of baseline and projected with-project conditions of the estuary system is needed, with flow volume, timing and water quality, salinity and other key variables accurately assessed.

2. Impact to Belle Isle natural resources and public serving facilities from possible significant increase in visitor use must be evaluated.

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

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

3. Project documents do not identify and evaluate current and possible future pedestrian and bicycle traffic along Greenway connections from East Boston to Winthrop at the Belle Isle Inlet along Saratoga Street.

Suffolk Downs Development Proposal
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4.4 Suffolk Downs: Natural Resources at the Project Site

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

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

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

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

- - -

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

4.5 Suffolk Downs: On-Site Public Open Space

Project documents do not have sufficient information on public open space to support a finding of net public benefit. For example, the PDA contains no guarantee of public free speech and assembly in open space locations. Enforceable designation of these sites for full, exclusive public use has not been established. As a result, project open spaces would function more as a private plaza within an office park or shopping mall rather than as a true public space as Boston Common or Brophy Park.

1. Freedom of speech and freedom of assembly must be guaranteed within all site open spaces.
2. Terms of public use of parks and open space - for organized sports teams or family events, for example, or for private functions from which the public can be excluded - must be specified in the PDA, Cooperation Agreement and other applicable agreements; all project agreements must be simultaneously brought forward and not relegated to a future time post-approval.
3. All public open space in the City of Boston portion of the site must be transferred to public ownership or protected under a conservation restriction; provision may be made in the PDA, Cooperation Agreement and other agreements for future open space adjustments, provided that no net loss of public open space shall be allowed.
4. The PDA must include a complete and accurate inventory of proposed open space in square feet, detailed by type and by project phase; the inventory must include identification of those sections of proposed open space within wetland, stream and other resources area or within a resource area buffer zone.
5. The inventory of proposed open space must differentiate between existing resource areas to be restored and new resource areas to be created, if any.
6. Hardscape / asphalt must be last resort for roadways, other public spaces and parking surfaces; calculation of permeable surface pre and post project is required.
7. With respect to roadways and pathways designated as open space, documents do not distinguish between routes which are pedestrian only, or pedestrian and bicycle only, or where vehicle traffic is allowed. A series of unambiguous exhibits and corresponding numerical tables are required to accurately assess whether these routes qualify as open space and provide a demonstrable public benefit.
8. Greenspaces between buildings needs greater analysis, as proposed density of the built environment is high. Street and sidewalk widths, medians, crossing areas, speed bumps, speed limits and building setbacks all need to be much more clearly defined for these greenspaces to accurately qualify as public benefit areas.
9. Shadows and wind remain a major unresolved concern, especially with respect to enjoyment of public spaces near and within the building clusters.
10. The PDA must include clear provision for art programming in public space, to be administered by a qualified, independent entity such as the ICA.

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

5.0 Suffolk Downs: City of Boston Policy & Project Review

Systemic flaws within City of Boston Housing Policy and Project Review have constrained creation of a truly sustainable and equitable development model for the Suffolk Downs site:

1. Documents state that the project will help advance the City's 2030 Housing Plan. This plan sets top-line unit growth targets by housing category but fails to acknowledge and address fundamental defects in existing City project review and approval. These defects range from neighborhood impacts of excess density due to unjustified zoning variances permitting small-site out-of-context development to the severe City-wide consequences of unchecked housing speculation, sanctioned under a target growth number and justified by the discredited theory that adding luxury housing inventory will ultimately yield new affordable housing.

Assertion that the project advances 2030 goals, a plan with fundamental defects and harmful assumptions, is not an unqualified endorsement.

2. The 2030 Plan was never subject to City Council consideration and approval but was simply an arbitrary directive adopted by the Mayor. The initial 2030 process did include a public component, but the subsequent amended plan with its increased unit growth target was not subject to any public or Council review, an especially serious error in that defects of the initial plan were by then well known.
3. Suffolk Downs (like the Widdet/Frontage site) was designated as a target growth site without any meaningful consideration of alternative uses or a forward-thinking policy and project review framework; application of a questionable assumption that standard Article 80, Inclusionary Development Policy, Planned Development Area processes and sustainability guidelines would be sufficient for a project of this scale.
4. The City's 13% IDP as a principle means to address affordable housing need may represent a basic public policy failure with direct harmful impacts on individuals and families: a sustained building program yielding no more than 13 affordable units for every 87 market rate-high end units creates an ever-receding horizon goal that will never be reached.

For the housing component at Suffolk Downs, reliance on flawed housing policy guidelines and application of an arbitrary 13% IDP rule while allowing significant shortfall on City's own climate resiliency goals would be a mistake of historic proportion.

Innovative housing affordability and climate change solutions are necessary, in light of East Boston neighborhood history and current household demographics, community climate risk, site scale and the extended project lifetime.

- - -



Tim Czerwienski <tim.czerwienski@boston.gov>

Fwd: Comment submitted to BPDA website re: Suffolk Downs

John Dalzell <john.dalzell@boston.gov>
To: Tim Czerwienski <tim.czerwienski@boston.gov>

Thu, May 30, 2019 at 10:03 AM

Hi Tim,

Just wanted to make sure that saw this; the subject line indicates that it was submitted online but it does not look like others that I have seen.

JD

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

From:
Date: Thu, May 30, 2019 at 9:22 AM
Subject: Comment submitted to BPDA website re: Suffolk Downs
To: john.dalzell@boston.gov <john.dalzell@boston.gov>

I am opposed to the Suffolk Downs project unless its design is changed to make it net zero carbon. It is no longer responsible to build any new development in Boston, let alone such a large one, unless it takes climate change into account. The International Panel on Climate Change has stated that we must reduce carbon emissions quickly and drastically worldwide to avoid the worst effects of global warming. In keeping with this reality, Mayor Walsh has set the goal of carbon neutrality citywide by the year 2050. To meet this goal, all new buildings in Boston must be built to a net zero carbon standard. In fact, if Suffolk Downs is not net zero, it will add to the climate problem. Additionally, its design should address climate resiliency, especially since it is close to the water.

Linda Hirsch
West Roxbury, MA



**CITY LIFE
VIDA URBANA**

Stand Up, Fight Back.

Dear Mayor Walsh, Tom O'Brien & Brian Golden,

my ~~name~~ is

Maria Ann Correale. I am a renter and I have lived in Winthrop Ma for 4 1/2 years. I am opposed to the HYM Suffolk Downs project because instead of more luxury housing and private streets, my community really needs more affordable housing for people like myself and others in my situation. Unfortunately, I'm in the lower income bracket, poverty level. The rents are very high as is, but the new high rents will raise rents even higher in my neighborhood putting myself and others at risk for displacement.

Thank you,

Maria Ann Correale

22 May 2019



**CITY LIFE
VIDA URBANA**

Stand Up, Fight Back.

5-21-19

Dear Mayor Walsh, Tom O'Brien, Brian Golden
My name is Albra Graham. I am a renter and
I have lived in Boston for 57 years.

I am opposed to the HYM Suffolk Downs project
because I believe that streets, sidewalks
and parks should be public and not
privately owned. The city should be owned by all
of the people, not just the rich.

Sincerely,

Albra Graham



**CITY LIFE
VIDA URBANA**

Stand Up, Fight Back.

To: Martin Welsh, Tom O'Brien, Brian Golden

My name is Frezza. I am renter and I have lived in Roxbury MA for the past 10 years.

I do not agree to the HYM Suffolk Down project because...

- 1) the rents in the 10,000 new units will raise rents in my neighborhood even higher than they are now, and working people won't be able to afford to live in Boston any more. This project will displace my family and the people of my neighborhood.
- 2) My children go to school there. If I am displaced because of increasing rents, my children will lose access to their school and resources in the neighborhood.
- 3) I rely on my neighborhood health center for medical care. If I am displaced, I will lose access to my medical providers and all of the resources I rely on.
- 4) I believe that the city should not create another luxury city at a time when working families have no housing options. This is morally wrong.
- 5) I believe that streets, sidewalks and parks should be public and not privately owned. The city should be owned by all the people not just the rich.

We need more housing that current residents can afford.

PO Box 300107 • 284 Amory St • Jamaica Plain, MA 02130 • 617.524.3541 • www.clvu.org

More investment in schools.
Resources for youth



**CITY LIFE
VIDA URBANA**

Stand Up, Fight Back.

5/21/2019

Dear, Mayor Marty Walsh, Tom O'Brien and Brayant
Goldwin

My name is Tenique Cross, I am a renter and I lived
in Boston Mass for 39 yrs. I believe justice and homes
for all is an citizen right.

I am truly apposed to the HYM Suffolk Down
project because the high rents in the 10,000 new units
will raise rents in all surrounding neighborhoods even higher
and working people won't be able to afford to live in
Boston anymore. This project will displace many families
in many neighborhoods. I truly believe that streets,
sidewalks and parks should be public and not privately
owned. The city should be owned by all of the people
not just the rich. Instead of luxury housing and
private streets the city needs Rent Control and
more affordable housing, investment in schools and
the community.

Sincerely,

Tenique Cross



**CITY LIFE
VIDA URBANA**

Stand Up, Fight Back.

Dear Mayor Walsh, Team O'Brien, Brian Golden
my friend Hunterka, I am Renterz and

I have lived in Boston for 25 yrs. I am
opposed to the HYU Suffolk County Project
because the high rents. At the 10,000
new units with raise rents in my
neighborhood even higher than they are
working people won't be able to afford
to live in Boston anymore, this project
will displace my family and the people
of my neighborhood. Instead of more luxury
housing and private streets. The city
really needs housing that current
residents can't afford. The project
is unacceptable. HYU needs to redesign
this project so the needs of the
community

5/21/19

Dear Mayor Walsh, Tom O'Brien, Brean Golden,

My name is Ashante Davis. I am a renter and I have lived in Boston for 5 years. I am opposed to the HYM Suffolk Down project because the high rents in the 10,000 new units will raise rents in my neighborhood even higher than they are now, and working people won't be able to afford to live in Boston anymore. This project will displace my family and the people of my neighborhood. Instead of more luxury housing and private streets, the City really needs Housing that Current residents can afford. This project is unacceptable. HYM needs to redesign this project so that it meets the needs of the Community.





**CITY LIFE
VIDA URBANA**
Stand Up, Fight Back.

Dear Mayor Welch, Ten O'Leary, Bryan Golden

My name is Christopher Graham I am a renter and I have
lived in Boston for 40+ years

I am opposed to the HYM Suffolk Down project
because I believe that ~~streets~~ streets, sidewalks and
Parks should be public and not privately owned the
city should be owned by all of the people
not just the rich instead of more luxury housing
and private streets the city really need resources
for youth this project is unacceptable. HYM needs
to redesign this project so that it meets ~~at least~~
the needs of the community.

Ch. E.



**CITY LIFE
VIDA URBANA**
Stand Up, Fight Back.

May 21, 2019

My name is Rose DeLillo Nozger, I am a owner and I have lived in Dorchester for 30 plus years.

I am opposed to the Hyatt Suffolk Down project because the high rents in the 10,000 new units will raise rent in my neighborhood even higher than they are now, and working people won't be able to afford to live in Boston anymore. This project will displace my family & people of my neighborhood.

Instead of more luxury housing & private streets, the city really needs more affordable housing and invest in schools.

Sincerely,

Rose DeLillo Nozger

BOB O'CONNOR
P.O. Box 301246
BOS. 02130
05/21/19

HELLO Hym!

SO FAR NONE OF YOUR
PROPOSALS INCLUDE LOW INCOME
ELDERLY &/OR HANDICAPPED
PERSONS. E.G. SECTION 8.
BOSTON NEEDS MORE LOW INCOME
HOUSING.

I AM ALSO A MEMBER OF
CITY LIFE. FOR THE PAST
NINE YEARS.

B.O'_____
CC: MARTY WALSH
BRIAN O'BRIAN



CITY LIFE
VIDA URBANA

Stand Up, Fight Back.

5/21/19

Dear Suffolk Dennis, Mayor Walsh, Brian Gade
and Tom Arzen
My name is Sybil Cross I am a Renten
and I have lived in Boston for 42 years
I am opposed to the Hyatt Suffolk
down projects Because I don't see
that you are for people or families
you are going to have apartments
that people cannot afford, to many
people are being displace because
they cannot afford a rent its not
fair to people Old/young to pick rent over
food to live. If you are for people
children, families, make it Really
Affordable to all

Sincerely
Sybil Cross



CITY LIFE
VIDA URBANA

Stand Up, Fight Back.

Dear, Marty Walsh
Brian Golden BPPA

My name is Cheryl Semnack. I am a Boston Resident, renter and I've Lived here for over 50 years. I am against the HYM Suffolk Downs project. because the city doesn't need more luxury apartments, with rents so high the people of the community can't afford it. This project will displace many people in the neighborhood. I believe this will create another Sea Port. The Streets, Sidewalks and Parks should be public not Private. Solely for the use of the Rich!! Instead of more luxury housing and Private Streets, the city really needs housing that current residents can afford. More investment in schools, resources for youth.

Thank You
Cheryl Semnack



**CITY LIFE
VIDA URBANA**

Stand Up, Fight Back.

Dear, ~~James Brown~~ Tom O'Brien

My name is Kimisha I have
lived here in Boston my whole life 23 years
I believe that streets, sidewalk and parks
should ~~be~~ ~~owned by all~~ public not
privately owned. the city should be owned
all! of the people, not just rich!!



**CITY LIFE
VIDA URBANA**

Stand Up, Fight Back.

To whom it may concern,

My name is Kasim Hussien.

I am a renter and I have lived in the area for $1\frac{1}{2}$ years.

I am opposed to the HRM Suffolk Down Project because it will be owned privately rather than the public. ~~the cause~~ I worry that it will be difficult to get around.

Also, I believe that will increase the rent for lower income. Instead of that, they should build affordable property for the people of the city.

Regards,

Kasim Hussien

Attention:

Mayor Marty Walsh

Tom O'Brien



**CITY LIFE
VIDA URBANA**

Stand Up, Fight Back.

Dear, Mary Walsh, Don O'Bryan
Brian Golden BDDA

My name is Morelia Morales.
I am renter and I have lived
in SP for 3 years.

I am opposed to the Hyman Suffolk
Down project because

the high rents in the 10,000
new units raise rents in my
neighborhood even higher than
they are now, and working
people won't be able to afford
to live in Boston anymore.

This project will displace
my family and the people
of my neighborhood.

Instead of more luxury housing and
private streets, the city really needs
housing that current residents
can afford.



For a thriving New England

CLF Massachusetts

62 Summer Street
Boston MA 02110
P: 617.350.0990
F: 617.350.4030
www.clf.org

May 31, 2019

Via email: tim.czerwienski@boston.gov

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

Subject: Suffolk Downs Planned Development Area Master Plan and Phased Development Plan

Dear Director Golden:

Conservation Law Foundation (CLF) submits the following comments on the Planned Development Area ("PDA") Master Plan and Phased Development Plan (Development Plan) for the Suffolk Downs redevelopment project (collectively, "the PDA documents"). The proposed project entails 16.5 million square feet of development on 161 acres at the former Suffolk Downs horse racing facility in East Boston and Revere. The PDA documents were submitted to the Boston Planning and Development Agency (BPDA) by HYM Investment Group (the "Proponent") for the development of 109 acres located in the City of Boston.

CLF has two main concerns: (1) the plans as submitted to the BPDA provide insufficient detail about the project's proposed community benefits, timeline for completion, and enforceability; and (2) the scale and anticipated impact of the development proposal is disproportionate to the proposed public benefits and mitigation. The BPDA should require the Proponent to go further on their commitments for transportation, housing, resilience, and public access.

We also note that these plans lack a comprehensive approach to addressing the anticipated climate, transportation, and housing pressures on this area and its existing residents. While there are limits to what any one developer can do to address these systemic issues, the scale of this project warrants analysis by the Proponent to identify and analyze the *cumulative* impacts of this project on the region.

The Proponent Must Provide Additional Clarity on Proposed Public Benefits.

The PDA Master Plan encompasses over 10 million square feet of commercial and residential development, 27 acres of public realm/open space, and extensive onsite and offsite transportation and utilities infrastructure. The PDA Master Plan sets forth the overarching land use, urban design, housing, streetscape and open space planning objectives for the site. In contrast, the Development Plan creates a tailored set of zoning requirements for each phase of development and sets forth the proposed number, height, density and use of buildings and an overview of the open space, transit, energy efficiency measures and other benefits tied to each development phase.

The Proponent has made several revisions to these plans over the past year and a half in response to calls for increased site access and resiliency, greater ecological and natural resource protection, and better incorporation of the new development into the surrounding community. In general, the plans presented to the BPDA are consistent with the Draft Environmental Impact Report (DEIR) submitted to the Commonwealth. However, the plans provide very little discussion of the Proponent's commitment to provide certain transportation, public realm, and open space improvements at each phase of the development. Specifically, each phase of the Development Plan contains the following language: "The architectural details of each building and the required public realm improvements associated with each building will be presented as part of the BPDA's design review."

According to the BPDA, a PDA Development Plan must provide for *specific* public benefits, the provision of which is enforceable by the Agency through the execution of a cooperation agreement.¹ This is to ensure that any deviations from base zoning allowed through a PDA do not unfairly burden the surrounding neighborhoods.

A Summary of Public Benefits and Project-Related Mitigation Measures accompanies the description of each phase of the Development Plan. While some benefits are explicit and tied to a particular phase, such as the provision of a 2,500 square-foot civic space to be located at Belle Isle Square at the completion of Phase 1, others are said to be realized during "all phases of construction," such as the planting of 1,500 trees. It is understandable to assert that certain amenities will be constructed across multiple phases; however, this appears to be the case for the majority of the public amenities enumerated in the PDA documents. The PDA documents should describe the provision large-scale benefits with greater specificity and provide a breakdown of benefits by Phase to increase transparency and accountability during development.

This is particularly true for major site improvements, including transportation improvements, climate resiliency measures, and public open spaces, that are integral to the success of the development. For example, the plan for Phase 2, which encompasses the construction of the Central Common and Outdoor Theater, does not state what specific amenities will be included in the build out (i.e. sports fields, walkways, landscaping, etc.). Similarly, there is no specificity about which or when multi-modal transit improvements will be installed, including but not limited to, bicycle paths and parking and bikeshare stations. The Proponent has also failed to indicate when certain public transportation amenities, including the proposed shuttle service, will be available. What is more concerning is that while the Proponent identifies the provision of shuttle services in two concentric loops within the project site and from the site to major transportation hubs as a prominent public benefit in the DEIR, the Proponent has not tied these critical

¹ <http://www.bostonplans.org/projects/development-review/planned-development-areas>

amenities to any particular phase of development in the PDA documents. In fact, the Proponent states in a disclaimer all transit improvements are subject to “continuing review by the Boston Transportation Department and MassDOT” and that shuttle service will be provided only insofar as it is “warranted by demand based on proposed service and implementation timing.” This creates a loophole that could result in no shuttle service at all, limiting public access to the site and locking in the use of single occupancy vehicles and expanding need for parking.

We understand that there are limits to defining building-by-building benefits in a Master Plan for such an extensive area over a long build out. However, the PDA will set the tone and expectations for development at Suffolk Downs for the next few decades. It is, therefore, critical that the plans be as detailed as possible. We strongly urge the BPDA and the Proponent to use these documents as an opportunity to clearly outline and define its community commitments. The PDA should include more explicit and time-bound language, to the maximum extent practicable, for the provision of all public benefits associated with the development.

The Plans Should Set and Commit Proponent to Higher Standards for Development.

The PDA process is one of the few remaining regulatory processes through which the City can secure the highest possible standards for resilient, transit-oriented, affordable and welcoming development. This is one of the single most important opportunities to ensure the Suffolk Downs development reflects a community-informed vision. After PDA approval, the area will be subdivided and the public’s ability to participate in development standards will be limited to a building-by-building basis. Beyond clarification of the project’s public benefits, the Master Plan and Development Plan should set higher standards for housing, transit, resiliency and neighborhood development.

- **Open Space and Public Access**

CLF is concerned about the accessibility, ownership, and maintenance of open space and public access at and near the site. The PDA documents state the Proponent will develop and maintain the site’s network of publicly accessible open space, streets, sidewalks, and walking and bike paths. The Proponent should also make clear in the plans how it intends to ensure that these privately-owned spaces remain fully accessible to all members of the public and how these amenities will remain public over the long term.

CLF strongly urges that the Proponent’s permitting documents, including the PDA Master Plan and Development Plan, clarify and ensure that there will be no restrictions on the lawful public use of open spaces and transit corridors owned by the Proponent and incorporate standards for maintenance. Indeed, the Secretary’s Certificate on the DEIR from January 25, 2019 raises this very issue, and requests that HYM address the concern in the Proponent’s FEIR.

Privately-owned public spaces can both intentionally and unintentionally restrict public access and activities that would otherwise be allowed in open spaces owned by a public agency, including freedom of assembly and the public’s ability to enjoy unrestricted access. The PDA documents or subsequent cooperation agreement should also enumerate the conditions under which the open space will remain accessible to the public on equal terms. These conditions should include requirements that ensure 24/7 access to public spaces, restrict the use of public spaces for private events or closures, and expressly prohibit property owners

and managers from discriminating on the basis of residency, race, religion, sex, age, disability, or other illegal distinction. Conditions for privately-owned public spaces are particularly important for deterring private policing and racial profiling, which disproportionately impact communities of color, immigrants, and refugees. Truly public spaces must be welcoming and available to all communities to enjoy and feel safe.

The Proponent asserts that the project will invest over \$170 million in onsite public transit infrastructure and open space areas at no cost to the City of Boston and that maintenance will be the responsibility of the Proponent or the association of building owners. Beyond that, the plans do not identify funding sources reserved for maintenance, define maintenance entails, or a specified time period over which private owners will maintain public spaces. The plans should state whether the Proponent has long-term plans to transfer ownership of transit or open space to a public agency and consider restrictive covenants filed with the Registry of Deeds that would permanently ensure public access to these amenities.

We suggest that one method by which to ensure this space will remain accessible to the public in perpetuity is through an open space conservation restriction recorded in the Registry of Deeds. For precedent, the BPDA can look to the conservation restriction placed on the site of General Electric's proposed headquarters in along the Fort Point Channel, where a conservation restriction encompasses the area of the parcel set aside by General Electric for continual public access and use.

- *Civic and Cultural Spaces*

The Suffolk Downs project is comprised of a significant portion of both Revere and East Boston. As such, the Master Plan for the entire project site creates an entirely new neighborhood, which will have a profound impact on the use, inclusivity, connectedness, and aesthetics of the entire area. Specific community benefits enumerated in the PDA include the creation of a 2,500 square foot ground floor civic space to be constructed as part of Phase 1 and setting aside 10 percent of the total retail square footage on the Boston side for local businesses and shopkeepers. These are welcome additions desired by the East Boston community and the City of Boston. Yet they fall far short of the community benefits expected at a site of this magnitude. Furthermore, the civic space, which has been thoughtfully integrated into the first Phase of construction, will only be temporarily housed in Belle Isle Square. It is unclear when or where this integral tool for creating a sense of place will be relocated – or why it must be moved. Creating a civic space with a built-in sense of impermanence will discourage the very community-building such spaces are created to foster. The PDA should address this oversight, while expanding its commitment to community benefits.

CLF recommends the BPDA also consider additional requirements for public realm improvements. 2,500 square feet of civic space is an extremely small percentage of the approximately 10 million square feet of development anticipated by the PDA. The BPDA's own Memorandum on Planning and Urban Design from February 2018 suggests the Proponent identify additional public realm spaces such as libraries, youth centers, schools and other civic and cultural spaces described as, "an important part of neighborhood character and signal to the public who is welcome here."² The BPDA and city officials have

² See the HYM Investment Group's Draft Environmental Impact Report Volume 2, <http://www.bostonplans.org/Documents/Projects/Development-Project-Filings/Suffolk-Downs-Draft-Project-Impact-Report-Vol-2>, page 452.

requested that the Proponent identify additional community assets and describe how they will complement the neighborhoods surrounding Suffolk Downs. The PDA process is integral in setting the community benefits for this site, and as such, CLF strongly urges greater requirements for civic and cultural spaces in the PDA.

- *Housing*

Some of the potential unintended consequences of the buildout of Suffolk Downs are rising rents, gentrification, and displacement. The current PDA documents state that all residential buildings on the Boston side of the site will comply with Boston's Inclusionary Development Policy (IDP) of 13 percent affordability. This will result in approximately 900 affordable units. The BPDA has simultaneously begun the process of reevaluating its affordable housing requirements through the IDP and the Policy is likely to be updated over the next year. This update may include an increase in affordability requirements.

CLF echoes the concerns of our community-based partners who have called for increased affordability at this site. The project as currently proposed falls far short of providing sufficient affordable housing to address the need East Boston and other city residents. The Proponent has provided neither analysis of housing displacement in Boston nor a displacement mitigation plan.

Of equal concern is the PDA's assertion that, "each building that includes residential uses shall provide the affordable housing units on site as required by the IDP, or subject to the approval of the BPDA, *the Proponent may redistribute the affordable housing units to other buildings or provide the affordable housing at an off-site location.*" This is consistent with the city's current IDP policy. However, it shifts the responsibility and accountability to individual building developers and may result in a significant number of affordable units being built offsite. Incorporating affordable units into developments lays the groundwork for diverse, mixed income neighborhoods, while shifting affordable units offsite exacerbates the potential for segregation and divisions. At a minimum, the PDA should set a requirement for the percent of affordable units required to be built onsite. The PDA should also include the approximate percent of area median income (AMI), a level of affordability, at which units will be offered.

There are precedents for PDAs setting higher standards of housing affordability to meet neighborhood needs. According to Section 64-29 of Boston's Zoning Code, any PDAs in the South End Neighborhood District must meet specific affordability requirements for residential projects: either no less than 20 percent of the units onsite are affordable, or no less than 10 percent of the units onsite are affordable *and* the developer must contribute an equivalent amount to the city's Inclusionary Development Fund. We strongly encourage the BPDA and Proponent to use the PDA process to anticipate and address current and future housing needs.

Finally, the proposed "Non-Discrimination and Affirmatively Furthering Fair Housing Covenant" is not sufficient. The covenant should be amended to more explicitly state the Proponent's fair housing obligations including affirmative marketing requirements. All housing developed at the site should be affirmatively marketed to members of all classes protected by the Federal Fair Housing Act (42 U.S.C. § 3601 et seq.), the Massachusetts Anti-Discrimination Law (M.G.L.c151B), and/or the Boston Fair Housing Ordinance (Boston Code of Ordinances, Chapter 10-3). The covenant should also more clearly state its

applicability to all owners, lessors or sublessors, real estate brokers, or other persons having the right of ownership or possession or the right to rent or lease. The Proponent should additionally be required to include ongoing monitoring obligations that will help ensure compliance with the requirements of the Master Plan.

- *Transportation*

The redevelopment of Suffolk Downs will increase demand for significant public transit and other transportation improvements. The PDA's transportation benefits are substantively in line consistent with those presented in the Proponent's DEIR. In response to that DEIR, numerous organizations including CLF, state agencies, and even the City of Boston voiced concern that the proposed transportation improvements were not aligned with the future needs of the area and would induce demand for single-occupancy vehicle use. Former Executive Office of Energy and Environmental Affairs Secretary Beaton's Certificate on the DEIR reinforced these concerns about congestion, overdevelopment, and induced demand. The DEIR Certificate requires the Proponent to conduct a new transportation assessment in light of Amazon's decision to not place its second headquarters at Suffolk Downs. The assessment is also required to optimize use of other modes besides single-occupancy vehicles.

With the understanding that a new transportation assessment will be conducted, there are numerous areas where the current PDA's transit proposals must be improved including reevaluating the expansion of Route 1A, creating expanded transit routes and access to transit options, funding to modernize MBTA bus maintenance facilities, funding for the connection from the Blue Line to the Red Line (Red-Blue Connector), developing on-site electric vehicle charging infrastructure powered by renewable energy and reducing the site's proposed parking.

The Proponent plans an expansion of Route 1A with an additional lane of traffic in each direction thereby creating a six-lane "superstreet," which would conflict with the roadway's existing pedestrian and bicycle routes and increase vehicle traffic by an estimated 57 percent. Adding 10 percent more lane miles to a city increases vehicle miles traveled by [10 percent](#). That is, [in less than 10 years](#), new roads cause traffic increases directly proportional to the increase in capacity. CLF specifically challenges the value and rationale of expanding Route 1A southbound, where a new third lane of traffic will ultimately have to merge with existing lanes before entering the two-lane Sumner Tunnel and inevitably increase congestion in the future. The Proponent has a duty to implement traffic mitigation and has an opportunity to encourage public transportation, active transportation, such as walking, biking, and scooters, and ride-sharing options.

The Proponents plans to construct a new MBTA bus route 119 stop and add stops throughout the site. CLF supports these bus route additions and encourages additional bus infrastructure improvements, such as annual maintenance fees of \$7,000 per bus stop to maintain a bus shelter and benches at each new stops and the addition of locations whether bicycle and scooter share options will be available. Further, CLF supports additional funds toward the MBTA's effort to modernize its bus maintenance facilities. The additions of stops along bus route 119 will create increased ridership and will result in the need for more frequent buses along the route. To accommodate the anticipated additional buses, the MBTA will require additional capacity at its bus maintenance facilities. CLF further urges a priority bus lane along Route 1A coupled with designated lane for the Route 119 bus to

travel throughout the site and additional MBTA bus stops near the Route 1A portion of the site. The Proponent plans to operate its privately-operated on-site circulator shuttle. The shuttle should be powered by electric vehicles capable of carrying multiple wheelchairs and strollers and requires additional electric vehicle charging infrastructure.

The Proponent commits to transportation studies, which CLF supports. Additional transportation funding is required for the construction of the Red-Blue Connector. Comments from local community organizations as well as city and state offices at earlier stages of this project have urged greater emphasis on providing transit connections to the site. The city's own transportation goals in Go Boston 2030 heavily emphasize public transit (44 percent) and walking and biking (28 percent), while driving alone is expected to be reduced citywide to 20 percent of all trips by 2030. A project of this size requires the development of regional transit improvements, including the Red- Blue Connector and the bus infrastructure improvements mentioned above, which further the goals of Go Boston 2030 and mode shift away from single-occupancy vehicles. Cumulatively, the Proponent plans to fund transportation improvements at a cost of \$50 million. CLF seeks additional transportation funding and questions whether some of the \$50 million could be redirected from highway improvements towards more robust public transit improvements, electric vehicle charging, and affordable housing.

The PDA further reinforces a vehicle-centric vision by providing excess parking. According to the Secretary's Certificate on the DEIR, the proposed project will have 15,520 total parking spaces at full buildout, with 557 of those being on-street parking spaces. By contrast, the Proponent asserts in the DEIR that peak parking demand for the site is estimated at 14,794, creating a surplus of over 400 parking spaces if the Proponent's design is implemented. Overbuilt parking amenities will not only induce use of single-occupancy vehicle travel, it will discourage alternative modes of transportation and increase greenhouse gas emissions unnecessarily. In the PDA, the Proponent anticipates building up to 7,216 structured parking spaces on the Boston portion of the site, with additional on-street parking. Because the number of proposed on-street parking spaces is not determined, it is unclear whether the Proponent will be reducing the parking ratios in Boston as has been requested by the city. CLF strongly urges the BPDA to include an enforceable maximum parking ratio for each building typology in each Phase such that buildout of the site is within the City of Boston's preferred ratios and so that future development will be held to the same standard.

Finally, the plans should be revised to clarify the locations of electric vehicle charging infrastructure powered by renewable energy.

- *Resiliency*

The PDA reiterates climate change resiliency measures from the Proponent's DEIR, including that the target first floor elevations for non-critical buildings is 20.5 feet Boston City Base (BCB), and 21.5 feet BCB for critical buildings, ground floor residential, and infrastructure to provide 1-2 feet of freeboard about the projected 2070 Base Flood Elevation (BFE). In addition, certain below-grade parking garages are intended to be used as additional flood storage. CLF recommends that the BPDA carefully consider whether 2070 is the most appropriate standard for resiliency measures. The design life of buildings at the site is estimated to be at least 50 years and Phase 5 will only be completed in the 2030s. The PDA also indicates that roadways onsite will be raised, however this sitewide resiliency measure is not defined with any specificity in the PDA. We recommend language

be added to the PDA to ensure transit resiliency measures are at least consistent with those mentioned in the DEIR and will meet BPDA's recommendations of approximately 2-4 feet in elevation. Given our evolving understanding of climate risks, language should also be added to the Development Plan to ensure the Proponent will consult with city staff in advance of each phase of construction to modify the phase's site and building design according to the latest and best available science.

While these measures may be effective in the short-term for neighborhood-scale resiliency, infrastructure adjacent to the site may cause longer-term risks. To the west of the site there are numerous fuel storage tanks. The east side of the site abuts Bennington Street. Both areas are low-lying. Resiliency measures described by the Proponent include adding a flood barrier between Bennington Street and Belle Isle Marsh, upgrading the Bennington Street Pump Station, and adding an additional tide gate at the eastern end of Sales Creek before Phase 4 construction. Comments from the Department of Conservation and Recreation and the Secretary's Certificate do not indicate there is state support or financing for such projects. CLF urges the Proponent to consider site designs that do not require future flood barriers to be built by regulators since the regulatory and financial feasibility of the proposed barrier appear unlikely. We also urge the Proponent to consider how the redevelopment project may negatively impact and exacerbate existing flood risk at the adjacent hazardous facilities; specifically, how the resiliency measures on the site, including the elevated grade, may impact the flood vulnerability of the fuel storage tanks. These concerns and the infrastructure necessary to address district-scale resiliency should be addressed in the later Phases of the PDA Development Plan. CLF also urges the Proponent to seek out other measures to improve flood resiliency at Suffolk Downs that do not result in negative impacts to its neighbors along Washburn Avenue.

In both the DEIR and PDA, the Proponent has committed to meeting LEED goals at full buildout and ensuring that all townhouses will be built to Passive House or Energy Positive standards. Specifically, 5 percent of the buildings onsite will be LEED Platinum certifiable, 75 percent LEED Gold certifiable and the rest LEED Silver certifiable. The LEED rating system is valuable for its comprehensive approach to sustainability, but lags behind other standards - notably Passive House - with respect to energy efficiency. The energy standards for LEED Gold construction are also currently less stringent than the state's Energy Stretch Code. In addition, the PDA Development Plan indicates the Proponent is starting with the low-hanging fruit and constructing 50 percent LEED Silver and fifty percent LEED Gold buildings in Phase 1, then gradually increasing the efficiency of later phase buildings to meet its sitewide standards.

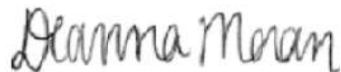
According to the BPDA's Memorandum on Environmental and Climate Change impacts from February 2018, it is expected that that the Proponent target low-carbon performance standards from the outset and that later-phase buildings should achieve net zero carbon performance. It is preferable to front-load energy efficiency measures and construction to mitigate emissions over the construction period. The PDA documents offer very little other information on each Phase's energy improvements and sustainable building practices. For instance, the DEIR contains a commitment that 20% of the site's total rooftop area will be set aside for green roofs. CLF requests that the final PDA encompass energy efficiency and sustainable building benchmarks for each Phase and the various methods through which these benchmarks may be met.

CLF underscores the importance of ensuring that key project elements and all of the project's public benefits be explicitly defined in the PDA and not relegated to a future point post-approval.

The redevelopment of Suffolk Downs presents an extraordinary and rare opportunity to realize a new sustainable, transit-oriented, mixed-use, climate resilient neighborhood. The Proponent's plans presents an impressive vision; however, we believe this project can and should go further. Suffolk Downs has the opportunity to be a model neighborhood development that encompasses forward-looking elements of energy efficiency, climate resiliency, accessible public transportation and affordable housing.

Thank you for your consideration of these comments. CLF looks forward to a continued dialogue with your office, the Proponent, and community stakeholders as this project moves forward.

Sincerely,

A handwritten signature in cursive script that reads "Deanna Moran".

Deanna Moran
Director, Environmental Planning



May 31, 2019

Via Email

Brian Golden
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E. Renee LeFevre
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Re: Fair Housing Concerns regarding Suffolk Downs Project

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

As you may know, Greater Boston Legal Services (GBLS) is a legal services organization that provides representation to low-income individuals and groups in the Greater Boston area. We work extensively with tenant, community, and fair housing groups seeking to create and preserve affordable housing in Boston, especially to expand fair housing opportunities for low-income members of groups protected under federal and state fair housing laws. The rapid pace of development in Boston, occurring alongside massive, systematic displacement of low-income Boston residents, often very long-term residents, is raising alarm and concern among residents and groups in neighborhoods across the City. These residents and neighborhoods want to make sure their voices and concerns are heard in the Boston Planning and Development Agency (BPDA) Article 80 and neighborhood planning processes.

We have reviewed the Planned Development Area (PDA) Master Plan and supporting documents related to the proposal of The McClellan Highway Development Company, an affiliate of HYM Investment Group LLC (hereinafter the "Proponent") to redevelop the Suffolk

Downs site at 525 McClellan Highway (hereinafter the “Project” or “Project Site”). About sixty percent of the acreage of the Project Site, as well as about seventy percent of the estimated 10,000 units of new housing intended to be built on the site, is located in East Boston—traditionally one of the City’s most diverse neighborhoods with a rich history as Boston’s gateway to generations of new immigrants, but also a community facing unprecedented displacement pressures due to rising rents. We are concerned that the Proponent’s current vision for the Project Site will exacerbate, rather than alleviate, these displacement pressures, as it promises to add thousands of high-end apartments to East Boston’s housing stock which would serve a lower mean household size than the current community average—while making minimal commitments to affordability. Therefore, our view is that approving the project proposal in its current form risks running afoul of the City’s obligation under fair housing laws to affirmatively further fair housing, as well as its basic obligation to serve the public welfare in exercising the government’s police power through zoning. At minimum, the City must further consider 1) whether the proposed project is likely to have an adverse impact upon a very substantial number of Boston residents who are not able to afford high-end rents and homeownership units, particularly those who are members of protected classes under federal and state fair housing laws, and/or perpetuate segregation; and 2) whether the proposed new housing meets the needs of the surrounding community in East Boston, including, but not limited to, the community demand for adequate housing that is suitable for families with children.

I. Given the size and magnitude of the proposed Project, the BPDA should demand broader and deeper affordability commitments than the minimum requirements of the City’s Inclusionary Development Program (IDP) in order to meet the housing needs of low and moderate income Boston residents and reduce the risk that this development will harm protected classes by worsening displacement in East Boston.

As BPDA is no doubt aware, Boston is in the midst of a truly devastating housing crisis, impacting most severely Boston’s low- and moderate-income residents, especially members of classes protected by federal and state fair housing laws. Approximately 69 percent of renter households up to 100 percent of the Area Median Income (AMI)—as well as 95 percent of renter households at 50 percent AMI or lower—are “rent burdened,” or paying more than 30 percent of their incomes toward housing costs.¹ Unfortunately, the brunt of this crisis falls disproportionately upon people of color and other protected classes—including and especially families with children headed by a person of color—who are disproportionately likely to have lower incomes, less wealth, and to be living in rent-burdened households. Black households with children in Massachusetts, for instance, are 4 times more likely to experience poverty than white households with children, and Latinx households with children are 5.5 times more likely to be impoverished than their white counterparts.² African-American and Latinx children are twice as likely to be living in households with a high cost burden in Massachusetts than white

¹ See City of Boston, 5-Year Consolidated Plan 2018-2023, at pp. 22–25, *available at* https://www.boston.gov/sites/default/files/consolidated_plan_part_i_narratives_180920.pdf.

² Annie E. Casey Foundation, Kids Count Data Center, Children in Poverty by Race and Ethnicity in the United States (2017), *available at* <https://datacenter.kidscount.org/data/tables/44-children-in-poverty-by-race-and-ethnicity#detailed/1/any/false/871,870,573,869,36,868,867,133,38,35/10,11,9,12,1,185,13/324,323>.

children.³ Not surprisingly, the high incidence of rent-burdened households in communities of color also translates to disproportionately high rates of eviction in these same communities.⁴ East Boston is no exception to this trend; in recent years, the community has been beset with a wave of gentrification-fueled rent increases and no-fault evictions.⁵ And although GBLS attorneys have made a longstanding commitment to fighting these trends (in coordination with community organizations in the neighborhood) via ongoing efforts to provide community legal education and eviction defense on behalf of affected tenants, these efforts can only postpone the inevitable “pricing out” of longtime residents to the exurbs, without dramatic intervention from the City’s policymaking arms, including the BPDA.

In light of this background context, the question of what to do with the parcel located at Suffolk Downs—which spans 109 acres of largely open land, a vanishing commodity in the City of Boston—takes on a particular urgency. The Proponent of the Suffolk Downs redevelopment seeks the enormous public benefit of a re-zoning of the PDA to allow for its proposed development. Without the public benefit of re-zoning for this industrial site, and other zoning relief, the Proponent’s ability to develop the project would be curtailed. And what the City decides to do with its broad authority to re-zone this vast site will have enormous consequences for East Boston’s future, as well as that of Boston as a whole. Therefore, in weighing this proposed re-zoning, BPDA must act for the “common good” of Boston residents and the general public welfare.⁶ As more and more land is snapped up for market-rate development, land available for badly needed affordable housing becomes in shorter and shorter supply. BPDA should not convey the massive benefit of a complete re-zoning of this parcel to allow for market-rate residential development without requiring that the Proponent provide substantially more affordable housing to meet the needs of low- and moderate-income Bostonians than it has offered. By contrast, BPDA has a duty to seek more affordability in these circumstances, and to ensure that in exercising its police powers, it benefits the city as a whole, including low- and moderate-income households who face the risk of displacement with the construction of thousands of unaffordable, market-rate rental units and increased demand for housing from an influx of new workers seeking jobs in the new commercial development.

³ Annie E. Casey Foundation, Kids Count Data Center, Children Living in Households with a High Housing Cost Burden by Race in the United States (2017), *available at* <https://datacenter.kidscount.org/data/tables/7678-children-living-in-households-with-a-high-housing-cost-burden-by-race?loc=1&loct=2#detailed/2/2-52/true/573,869,36,868,867/10,11,9,12,1,185,13/14832,14833>.

⁴ See generally Jennifer McKim and Alejandro Serrano, *As rents soar in Boston, low-income tenants try to stave off eviction*, BOSTON GLOBE MAGAZINE, Feb. 19, 2019, *available at* <https://www.bostonglobe.com/magazine/2019/02/19/rents-soar-boston-low-income-tenants-try-stave-off-eviction/QddCq1bLrV3JQhaFTzYnGP/story.html>

⁵ See generally Simon Rios, “*The First To Leave East Boston Are Us*”: Rising Rents Are Pushing Some Residents Out,” WBUR, July 19, 2015, *available at* <https://www.wbur.org/news/2015/07/06/east-boston-rents-residents>; Beth Teitell, *Gentrification in Eastie and Southie leaves some behind*, BOSTON GLOBE, March 25, 2016, *available at* <https://www.bostonglobe.com/metro/2016/03/25/changingboston/bmw2iUSRDbV3u8JVM7zKvJ/story.html>; Chris Sweeney, *The Battle for Eastie’s Soul*, BOSTON MAGAZINE, April 30, 2019, *available at* <https://www.bostonmagazine.com/news/2019/04/30/eastie-showdown/>.

⁶ See, e.g., *Village of Euclid, Ohio v. Ambler Realty Co.*, 272 U.S. 365, 388 (1926); *Spector v. Building Inspector of Milton*, 250 Mass. 63 (1924); *Opinion of the Justices*, 234 Mass. 597 608 (1920)(police power as “the safeguard of the public interests”).

East Boston now consists of just 16,826 occupied units.⁷ The Proponent seeks to add 7,000 more units, a nearly 50% increase in housing units. But 87 percent of those new units would be rented or sold at unfettered high-end rents or prices. The 13% that would be sold or rented with income restrictions would only serve households between 70% to 100% of the area median income, when the median income of East Boston is only \$52,935, roughly half the area median income.⁸ The vast majority of East Boston residents suffering the highest housing cost burdens and most at risk of displacement would not benefit. Meanwhile, the introduction of so many new market-rate units would cause housing costs to rise in the vicinity.⁹ Without any offsetting production of units affordable to the majority of East Boston residents, the displacement crisis in the neighborhood will only worsen.

As the U.S. Supreme Court noted in the seminal federal case recognizing the validity of zoning regulation, *Village of Euclid, Ohio v. Ambler Realty Co.*, 272 U.S. 365, 387 (1926), “while the meaning of constitutional guaranties never varies, the scope of their application must expand or contract to meet the new and different conditions which are constantly coming within the field of their operation.” At this time, in this City, housing instability and displacement is a looming threat literally terrifying and disrupting the lives of countless Bostonians. BPDA must act for the public good in this zoning process and require more and deeper affordability before it conveys the substantial benefit of re-zoning. The City does not have any obligation to accept a re-zoning proposal that would harm its residents.¹⁰

The Proponent suggests that we look to the South Boston Seaport redevelopment as a model, but that result would be unacceptable in the East Boston community, since it prioritized serving well-to-do newcomers over existing Boston residents; a similar result here would be tragic for many East Boston residents who are already significantly rent-burdened. Research shows that such neighborhood upzonings result in increased property costs, threatening local residents. A recent study, conducted by a local M.I.T. academic, Yonah Freemark, illustrated the potential negative impact of upzoning, using Chicago as a laboratory. Freemark found that, after upzoning in specific neighborhoods, “property prices will increase in upzoned areas and new construction won’t accelerate.”¹¹ His policy conclusion is that

[i]n any area that city officials are considering for increased density, they should take seriously the concerns of local residents who are worried that their housing costs will

⁷ See Boston Planning & Development Agency, *Boston In Context: Neighborhoods, 2013-2017 American Community Survey*, at 7 (January 2019).

⁸ *Id.* at 25.

⁹ See “Upzoning Chicago: Impacts of a Zoning Reform on Property Values and Housing Construction,” March 29, 2019, <https://urbanaffairsreview.com/2019/03/29/upzoning-chicago-impacts-of-a-zoning-reform-on-property-values-and-housing-construction/>; see also Richard Florida, ‘Build More Housing’ Is No Match for Inequality, CITYLAB (May 9, 2019), <https://www.citylab.com/equity/2019/05/housing-supply-home-prices-economic-inequality-cities/588997/>

¹⁰ See, e.g., *Opinion of the Justices*, 234 Mass. 597. 610-11 (1920)(property owner who experiences a lessening of land value due to a permissible restriction imposed upon its use “must be held to be compensated by the general benefit to the community of which he is a member.”)

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

increase. They should identify strategies designed to address that possibility, such as rent stabilization and immediate investments in new affordable housing.¹²

In order to avoid having East Boston face the rising costs and displacement the Chicago study predicts will ensue as a result of the massive influx of market-rate housing the Proponent intends to construct at Suffolk Downs, BPDA must insist on substantially more investment in more deeply affordable housing.

Aside from BPDA's duty to act for the public good in general in its review of the Proponent's proposal, BPDA has an obligation not to permit discrimination against members of protected classes, including discrimination through a disparate impact on protected class members,¹³ and to affirmatively further fair housing.¹⁴ The negative impact of a massive introduction of high-cost housing to East Boston, without adequate mitigation, will especially be felt by members of protected classes, who are more likely to be low-income. Nearly 64 percent of East Bostonians are persons of color, the vast majority of whom (57.4 percent of the total) are Latinx.¹⁵ Households of color in general in Boston have significantly lower incomes than white households.¹⁶ Latinx families in Boston are the lowest income demographic group,¹⁷ the group most likely to experience poverty,¹⁸ and the group with the highest housing cost burden.¹⁹ Latinx families in Boston have incomes that are barely over a third of the incomes of non-Hispanic white Boston families.²⁰ Other renter households in protected classes in the Boston metropolitan area also have much lower incomes than those not in the same protected class, including female-headed households, households with children, households with any elder, and households with any disabled person.²¹

Latinx households in East Boston, and other renter households in protected classes, are thus at far greater risk of displacement or hardship from rising rents than households not in protected classes. A failure to require a substantial affordable housing commitment from the Proponent before authorizing the proposed re-zoning would disproportionately harm households

¹² *Id.*

¹³ 42 U.S.C. Section 3601, *et seq.*; G.L. c. 151B, Section 4; *see Texas Dept. of Housing and Community Affairs v. Inclusive Communities Project, Inc.*, 135 S.Ct. 2507 (2015) (recognizing disparate impact fair housing claims under 42 U.S.C. Section 3608, *et seq.*); *Burbank Apartments Tenant Association v. Kargman*, 474 Mass. 107 (2016) (recognizing disparate impact fair housing housing claims under G.L. c. 151B, Section 4).

¹⁴ *See* 42 U.S.C. Section 3608(e).

¹⁵ *See Boston in Context*, *supra* Note 7, at 9

¹⁶ *See, e.g.,* Stone, Michael, Ph.D., Boston Median Incomes 2012, City, By Race and Tenure (unpublished research).

¹⁷ *Id.*

¹⁸ Annie E. Casey Foundation, Kids Count Data Center, Children in Poverty by Race and Ethnicity in the United States, *supra* Note 2.

¹⁹ Annie E. Casey Foundation, Kids Count Data Center, Children Living in Households with a High Housing Cost Burden by Race in the United States, *supra* Note 3.

²⁰ Stone, *supra* Note 16.

²¹ McArdle, Nancy, Percent of Renter Households with Incomes At or Above Boston Metro Median: 2015 (unpublished research based upon data from the Census Bureau's 2015 American Community Survey, 5 year estimates, Public Use Microdata Sample. HUD, 2015 Income Limits for Boston-Cambridge-Quincy, MA-NH Metro FMR Area). All of these renter households in protected classes are significantly more likely than their counterparts not in the same protected class to have incomes below the median income, adjusted for household size.

of color in East Boston, especially Latinx households, as well as members of other protected classes such as female-headed households, households with children, households with any elder, and households with any disabled person, as compared to households not in protected classes. BPDA must do its utmost on behalf of these vulnerable households to avoid disproportionate harm, both to avoid a potential disparate impact and also to fulfill BPDA's and the City's obligation to affirmatively further fair housing under federal law.²² Further, in order to protect vulnerable households into the future from the impact of any re-zoning causing housing cost increases in East Boston, BPDA must ensure that affordability restrictions are permanent.

II. The proposed project appears to prioritize construction of studios and one-bedroom units over larger units, notwithstanding the fact that East Boston, as well as the City of Boston as a whole, is in dire need of new construction that will serve the needs of families with children.

The BPDA has already noted, in its review and comments on Proponent's Draft Project Impact Report (DPIR), that the housing construction envisioned for the Project Site could operate to exclude families with children.²³ Specifically, it has already asked the Proponent to explain why the average proposed household size for the housing units at the Project, which is 1.58 persons per household for the entire Site and 1.59 persons per household for that portion of the Site which is located in Boston, contrasts so sharply with the average current household size for East Boston, which is 2.8 persons per dwelling unit.²⁴ The BPDA specifically requested that Proponent provide a detailed analysis to justify its "very low" proposed average household size, including a comparative analysis of similar projects or census tracts.²⁵ The Proponent has entirely refused to engage in such an analysis, or meaningfully explain its choice to prioritize smaller or lower-occupancy units over those that could accommodate families with children. In fact, although it promises to provide a "variety" of both unit types and unit size, in almost the same breath, it states that "the average household size of 1.59 is driven by the proposed apartment and senior housing program, *which consists of smaller size units and lower bedroom counts*"—implying it will prioritize construction of *rental* units (as opposed to townhome and condo units, which are likelier to be ownership opportunities) that are smaller and thus less accessible to the working-class families who currently call East Boston home.²⁶

To the extent Proponent's vision for the Project Site remains the construction of a huge volume of new housing that would be flatly inaccessible to larger families, approval of the Project would raise serious fair housing concerns, most obviously because families with children are a protected class for purposes of the fair housing laws and would be less likely to be able to pursue the new units as single individuals or childless couples.²⁷ In recent years, families have

²² See 42 U.S.C. Section 3608.

²³ See Proponent's Supplemental Information Document, filed May 1, 2019, *available at* <http://www.bostonplans.org/getattachment/8af639bc-decb-4123-8a90-7a1a1ec759a5>.

²⁴ *Id.*, at p. 2-16.

²⁵ *Id.*

²⁶ *Id.* at p. 2-6 (emphasis added)

²⁷ See 42 U.S.C. § 3604; M.G.L. c. 151B, § 4(11).

made up a larger portion of rental market.²⁸ Affordable housing allows families to spend more on food, health care and other resources that promote general family welfare.²⁹ Housing stability has also been shown to promote better social, behavioral, and educational outcomes for children.³⁰ Because the proposal does not provide adequate numbers of affordable housing for families currently living in East Boston and the City as a whole, the housing situation for many of these families may become destabilized, leading to negative outcomes, especially for their younger children.³¹

Amendments to the Fair Housing Act were added specifically to address discrimination against families “in light of an express concern for the plight of single-parent families, young families with children, and poor families.”³² Those that the amendments specifically aimed to protect are the very groups whose interests are being ignored or disregarded by the current structure of the Proponent’s proposal. The overemphasis upon smaller housing units would also likely have a disparate racial impact, in violation of both state and federal law, given that Latinos—who make up 57.4% of the population of East Boston, according to the most recently-available demographic information³³—are likelier than other ethnic groups to live in larger family units (which for cultural reasons often include extended family).³⁴ Beyond not adequately addressing the current and future housing needs of the residents of East Boston, the proposal’s lack of affordable and family appropriate units may encourage the remaking of these neighborhoods in such a way that disparately impacts Latino families.³⁵ Squeezing out current minority residents in neighborhoods approaching a tipping point of majority-white makeup in effect perpetuates segregation within an already deeply segregated city. The potential of this proposal to perpetuate segregation may run afoul of the requirements of federal and state fair housing law.³⁶ Therefore, the BPDA must push the Proponent to build more family-friendly housing on the Project Site in order to fulfill its regulatory duty to affirmatively further fair housing in East Boston and the rest of the City.

III. The proposed “non-discrimination covenant” included in the PDA Master Plan is inadequate.

²⁸ U.S. DEP’T OF HOUS. AND URBAN DEV., DISCRIMINATION AGAINST FAMILIES WITH CHILDREN IN RENTAL HOUSING MARKETS iv (2016) <https://www.huduser.gov/portal/sites/default/files/pdf/HDSFamiliesFinalReport.pdf>.

²⁹ *Id.*

³⁰ *Id.*

³¹ *Id.* at 6.

³² *United States v. Branella*, 972 F. Supp. 294, 297 (D. N. J. 1997).

³³ See Boston Planning & Development Agency, *Boston In Context: Neighborhoods, 2013-2017 American Community Survey*, at 9 (January 2019).

³⁴ See Tim Iglesias, *Moving Beyond Two-Person-Per-Bedroom: Revitalizing Application of The Federal Fair Housing Act to Private Residential Occupancy Standards*, 28 GA. ST. U.L. REV. 619, 649 (2012).

³⁵ *Inclusive Communities*, *supra* Note 13, 135 S. Ct. at 2523 (stating that zoning officials and developers must look at subjective factors such as neighborhood preservation when considering approval for development projects); See *CROSSRDS v. MSP Crossroads Apartments LLC*, 2016 WL 3661146, at *5 (D. Minn. 2016) (finding prima facie disparate impact claim for plaintiffs who alleged that landlord remade the demographic composition of an apartment complex that, in effect, negatively and disproportionately impacted African American tenants).

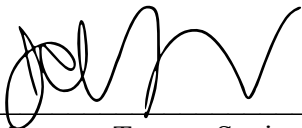
³⁶ Hannah Weinstein, *Fighting for a Place Called Home: Litigation Strategies for Challenging Gentrification*, 62 UCLA L. Rev. 794, 830 (2015).

Separate from the Proponent's sparse commitment to ensuring that the Project will create housing that is affordable and accessible to East Boston's current residents, we also wish to express our alarm at the proposed "Non-Discrimination Covenant" currently codified at pp. 9–10 of the Master Plan, at least as it is currently worded. While we strongly support the principle behind having deed restrictions for the Project Site designed to ensure that no present or future owner of the Site or any part thereof engages in unlawful discrimination, the language currently enshrined in the Master Plan is simply not strong enough to be meaningful.

First, the Covenant only expressly forbids discrimination on the basis of "race, creed, color, sex, sexual preference, disability, religion or national origin," which is a far narrower set of protections than that which is already enshrined into federal and state law (omitting, for example, the obligation not to discriminate on the basis of family status, age, source of income, and veterans status, among other well-established protected classes). The Covenant should, at minimum, be widened to include these protected classes, as well as any other protected class that may become enshrined by future amendments to state and federal anti-discrimination law, so as to ensure that the BPDA and the City are empowered to utilize the enforcement authority created by the Covenant to stamp out *any* act of discrimination on the Project Site that would otherwise be unlawful under state or federal law. Second, the Covenant imposes *no* affirmative obligations upon the Proponent or any future owner on the Site, such as affirmative marketing requirements to members of protected classes or other measures that would affirmatively further fair housing goals—which are especially critical in this context, where the size and scope of the Project promises to impact the area housing market so profoundly. Finally, the enforcement provisions in the proposed Covenant are imprecise and must be strengthened, so that victims of housing discrimination on the Project Site need not rely solely upon private civil lawsuits—which are nearly always costly and time consuming—in order to obtain redress.

We look forward to the opportunity to discuss these issues, and others related to the Project, in the near future, and may be reached at any time at the phone number below. Thank you for your time and consideration.

Best,

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

Margaret Turner, Senior Attorney
Joseph Michalakes, Staff Attorney
Thomas Coffey, Law Student
Inaara Tajuddin, Law Student
Greater Boston Legal Services, Housing Unit
197 Friend Street
Boston, MA 02114

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

May 31, 2019

Dear Messrs. Golden and Czerwinski,

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

Timing of the PDA

A Planned Development Area, as described in the Boston Zoning Code S. 3-1A should provide for specific public benefits, should provide that the plan conforms to the general plan for the city as a whole, and should provide that nothing contained within the PDA will be injurious to the neighborhood or otherwise detrimental to the public welfare.

The McClellan Highway Development Company has not yet entered into a cooperation agreement with the Boston Planning and Development Agency (BPDA). Both the Draft Project Impact Report (DPIR) filed with the BPDA and the Draft Environmental Impact Report (DEIR) filed with Massachusetts Environmental Policy Act Office remain draft documents.

Before approving the The McClellan Highway Development Company's PDA, the following actions should occur:

- Both the DPIR and DEIR should be accepted and approved in their final form by their respective agencies. A "Preliminary Adequacy Determination" is not sufficient for a project of this size and scope.
- The BPDA should enter into a master plan cooperation agreement that outlines mitigation measures to be provided by the developer to address project impacts as a whole. The cooperation agreement should stipulate that smaller-scale agreements will be implemented for each building in the project, and for each phase of the project (ie 1B, 2B, 3B as described by the developer). The community and the Impact Advisory Group should be provided a 90-day period to review and comment on the master plan cooperation agreement.

Affordable Housing

Of 7,474,000 square feet of residential development, more than 13% needs to be affordable. The proponent's April 30, 2019 presentation with a slide deck proclaiming that *Everyone is Welcome Here* was very nice, but without some real modifications to the proponent's affordable housing plan, it is clear that not everyone will feel welcome at Suffolk Downs. When it comes to creating a diverse and inclusive neighborhood, this is an issue of both affordability and of civil rights.

A minimum of 20% of the residential units constructed on Suffolk Downs should be inclusionary units.

Modifications to McClellan Highway

Adding more capacity for more cars is not going to solve the traffic problems of our city or our region. Route 1A is a dangerous corridor that segregates the East Boston neighborhood from the Chelsea Creek.

The width of the highway should not be expanded and the current configuration should restrict the right lane to rapid transit busses and no-emission high occupancy vehicles. The sidewalks should be widened, protected bicycle tracks should be added, and traffic calming measures should be implemented between Bell Circle and Curtis Street.

Previous Comments on DPIR and DEIR Filings

Please consider the following comments on the proponent's DPIR and DEIR filings in the context of awarding a PDA that will allow for the floor area ratio requested by the proponent.

Urban Design/Open Space Network:

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

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

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

Sustainability/Green Building:

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

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

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

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

The proponent should commit to a specific number of electric vehicle charging stations, ideally six or more per building in the project.

Transportation

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

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

Summary of Mitigation/Draft Section 61 Findings

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

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

The proponent should commit to the creation of a perpetual community benefit fund supported by HYM, Cathexis Holdings, and the various individuals and trusts that stand to profit from the construction of this development; to be managed by an open and transparent external charitable foundation.

In the filing, the proponent stated “The Proponent expects additional benefits, such as the establishment of a community fund to be developed in close coordination with the

IAG as part of the Article 80 review process.” The establishment of a fund should be considered with the master plan, not on a building-by-building basis.

Thank you for considering these comments.

Sincerely,

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

Alex DeFronzo
Impact Advisory Group

Marcos Luna, PhD
Neenah Estrella-Luna, MPH, PhD
143 Saratoga Street, East Boston, MA 02128

31 May 2019

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

Dear Mr. Czerwienski,

We are writing to provide comment on the proposed Master Plan for Suffolk Downs dated February 1, 2019. We have also reviewed the Supplemental Information Document (SID) dated May 1, 2019. We address here commitments in the Master Plan and SID that we believe are constructive or useful, some questions or issues that are likely to be addressed relatively easily, and other areas where the Master Plan can be improved with recommendations for the BPDA to consider.

Commitments in the proposed plan that are constructive or useful

We appreciate that the Master Plan proposes a mix of uses across the site. The development of Suffolk Downs will effectively become a new neighborhood within East Boston. It is important that this development continue with a mixed use approach that characterizes a good quality of life in an urban neighborhood.

We also appreciate the proposed integration of active as well as passive green spaces throughout the development as well as at the two adjacent T-stops.

The commitment to using LEED standards as well as constructing passive or energy positive housing is commendable. Construction using passive or energy positive approaches will contribute to achieve Boston's Zero Carbon and other climate change mitigation goals. We also appreciate that the developer has committed to constructing all buildings to be solar ready.

Immediate questions and issues

There appears to be a conflict in the number of townhomes proposed for Suffolk Downs. Page 5 of the Master Plan specifies that 8 townhomes will be constructed during Phase I and 4 townhomes will be constructed in Phase II for a total of 12 townhomes. No other townhomes are proposed in the remaining phases. However, on page J-4, under the GHG Emissions section of the table, it states that 22 townhomes will be constructed. This may simply be a typo or it might include proposed townhomes on the Revere side of the development. In either case, this is something that should be clarified in the PDA's Master Plan.

The Master Plan proposes to contribute to small business development by offering "flexible lease terms" in its retail spaces. What this means is not clear. Ideally, the Master Plan provides a more explicit commitment to affordable leasing for businesses. Absent an existing business development program that the developers of this site can tap into, the Master Plan should make clear what the expectations are so that the City and the residents can hold the developer accountable.

Areas for improvement

There a number of areas of concern that warrant closer scrutiny and revision.

One area of concern is that dormitories for educational institutions is included as an allowable use. This is inappropriate for at least two reasons. First, development of this site should endeavor to maintain the urban residential character of East Boston as a whole. Undergraduate dormitories are simply inconsistent with a neighborhood like ours. Second, there is no college or university in East Boston, Revere, Winthrop, Chelsea or any other nearby city that would justify the creation of dormitories in this neighborhood. The purpose of dormitories is to house students near their school, providing them with a sense of community and connection to the school and to relieve the rental market pressures that undergraduate students create in the larger housing market.

At the same time, housing for graduate level students or post-graduate professional trainees (e.g., medical residents) would likely be a more acceptable compromise. Graduate students and post-graduate professional trainees are generally older, more mature, and can be assets to a neighborhood. However, unless the Master Plan specifies that such housing is restricted to graduate students or post-graduate professional trainees, this particular use should be removed.

Recommendation: Remove student dormitories as an allowable use unless it is explicitly restricted to housing for graduate or post-graduate professional training individuals and families.

The Master Plan describes creating a historic mitigation plan as part of the project. However, the only history of the site specified is related to the race track. We recognize that this is an important part of the history of the site, and provides its namesake. However, there is much more to the history of this place than the race track. This area was used for many hundreds of years by indigenous populations long before the arrival of Europeans. The erasure of that history contributes to both ignorance of the impact of European colonization on indigenous populations, misunderstanding about local history, and continued bias against indigenous populations.

Recommendation: The Master Plan should require collaboration with the descendants of the indigenous groups of this area displaced in the colonial period to contribute to an interpretive exhibit developed on the site. The Massachusetts Commission on Indian Affairs and the North American Indian Center of Boston should be able to provide assistance with this effort.

As described in the Master Plan, the entire site would be privately operated. While we can see that this might seem attractive in terms of managing the City's budget, it raises a number of concerns. First, we would expect that this would raise the cost of renting or leasing on the site. One of the benefits of having the cost of public services embedded in property and other taxes is that it creates efficiencies in scale by spreading the cost across larger groups of people. Fees for property management of roadways and sidewalks across this site would inevitably have to be included in the purchase prices (or HOA fees), rents for housing, or business leases. Spreading costs across a much smaller number of parcels will inevitably make those costs higher for the purchaser or tenant. If the City of Boston is serious about controlling the costs of housing and promoting small business development, then controlling sale prices, rents, and leases is necessary. To accomplish this, the roadways, sidewalks, and other public spaces should be owned and maintained by the public – meaning by the City of Boston.

In addition to economic factors, a privately owned and operated development, especially at the scale of Suffolk Downs, weakens public accountability for public services. As decades of research on public-private partnerships have demonstrated, it is more difficult and more expensive to ensure private entities accept responsibility for their commitments and actions (or inactions) than it is to hold public entities accountable. Creating a privately maintained neighborhood also contributes to the decline in connection with government, which research has shown contributes to lower levels of civic engagement, lower levels of voting, and lower satisfaction with

government actors. If the City of Boston is serious about supporting civic engagement, it would not support the creation of private communities that have no connection to city government.

Recommendation: Remove language on page 4 of the PDA's Master Plan (and associated documents) that states "All of the streets, sidewalks, walking paths, and bicycle paths located within the Master Project will be operated and maintained by the Proponent or the association of building owners at no cost to the City of Boston."

The PDA's Master Plan proposes to comply with the City of Boston's inclusionary zoning policies. There are two problems with this. First, the Master Plan only commits to the minimum 13% of total units being affordable. This does not address the loss of actual affordable housing on the private market over the past 5-10 years. East Boston is experiencing displacement of long term residents as well as lower income residents due to market pressures directly related to the City's decisions to permit above market rate housing construction on the waterfront. Given the scale of the development at Suffolk Downs, the City should use this as the opportunity to redress the loss of affordable housing, a problem the City itself is partly responsible for.

The second problem here is that the City's inclusionary zoning policies do not actually result in rents that are affordable even to median income East Boston residents. The actual household median income in East Boston is \$52,935 (according to the most recent estimates from the US Census Bureau). However, BPDA has chosen to use the Boston-Cambridge-Quincy HUD Fair Market Rate (FMR) in determining the area median income (AMI) which then determines the maximum rents in affordable housing units. This is noteworthy in two aspects. First, there is no regulatory requirement to use HUD's FMR areas in local inclusionary housing policy. The City is only required to use the area for federal reporting purposes. BPDA has the authority to choose. In the recent past, BPDA did change the AMI criteria for a short period of time but reverted back to the HUD FMR area reportedly because it was confusing to developers. Second, by using HUD's FMR area rather than the Census defined Metropolitan Statistical Area, the City of Boston has inflated the AMI used to determine maximum rents in Boston to over \$95,000. This is 53% greater than the City's actual household AMI (at \$62,021) and 79% greater than East Boston's household AMI. In effect, the City of Boston's own formulas result in rents that are not actually affordable for East Boston households. When individuals and families spend more money on rent, they spend less money on other goods and services and they are less able to save money. These policies create structural inequities for lower income residents and are effectively barriers to economic stability or social mobility. The Master Plan for Suffolk Downs is an opportunity for the City to address this structural inequity.

A separate but related concern is the provision on page 9 which states, "...subject to the approval of the BPDA, the Proponent may redistribute the affordable housing units to other buildings or provide the affordable housing at an off-site location." Given the loss of affordable housing in the neighborhood, all required affordable housing developed at Suffolk Downs should be built on site. The developer should be prohibited from constructing any affordable housing subject to this Master Plan off site.

Recommendation: The Master Plan should require the total number of affordable units constructed to no less than 20% of housing units developed. The Master Plan should also mandate specific ranges of the numbers of micro, studio, 1, 2, and 3 bedroom that are included in the 20% in order to ensure that a sufficient number of affordable units are available for families.

Recommendation: Affordable housing units should also be deed-restricted as affordable in perpetuity.

Recommendation: The Master Plan should require that maximum rents for affordable housing be determined by using the most recent 3 or 5 year ACS estimates of median incomes for either East Boston specifically or the City of Boston as a whole.

Recommendation: The Master Plan should remove the language on page 9 allowing off-site construction of affordable housing units and replace it with language mandating all affordable housing units are constructed at Suffolk Downs.

Home-sharing services like AirBnB have had a significant effect on the loss of affordable housing in East Boston by removing rental units for individuals or families from the market. The City Council has addressed one aspect of this problem by effectively prohibiting corporately owned AirBnB units in the city. The development of Suffolk Downs could contribute to controlling the growth of these units by prohibiting them in the deeds of both owned and rented units. This would contribute to stabilizing the rental market in particular and ensure that Suffolk Downs doesn't become simply an investment vehicle for out-of-town owners with no interest in the community.

Recommendation: The Master Plan should include language committing to prohibiting home-sharing uses of residential properties.

The Master Plan includes language that will record covenants that run with the land that prohibit discrimination on the basis of specified identities. On the one hand, this only states that the developer and late management of the development will comply with state and federal anti-discrimination laws. On the other hand, perhaps this is foresight given the turn in national politics. However peculiar or commendable these provisions are, what is lacking is any meaningful mechanism for enforcement of the covenant. There is one line on page 9 which limits enforcement to the BPDA or the City of Boston. This is insufficient as it relies on the interest and resources of the City to hold a private entity accountable for compliance with its own covenants and state or federal law. Unfortunately, the City of Boston has not demonstrated a reliable track record of enforcing its own policies in small developments (see, for example, the lack of compliance with the inclusionary zoning policy in the development of 135 Athens Street/160 West Broadway in South Boston and the inadequate response by the city).

This raises a larger concern about the Master Plan generally: the lack of enforceability by anyone other than the City of Boston. Given the resource constraints and other conflicts, a private right of action should be explicitly included in the Master Plan to allow other interested parties to supplement oversight and enforceability of the provisions of the Master Plan. This would strengthen community accountability from the developer as well as from the BPDA as this site is developed over the next two decades.

Recommendation: The Master Plan should include a provision that explicitly allows for private rights of action to ensure compliance with all aspects of the Master Plan, including but not limited to the anti-discrimination covenants.

The flood adaptation and mitigation measures included in the Master Plan are underdeveloped and potentially create unnecessary risk for future users and residents as well as the surrounding community. The Master Plan states that a 52,000 cubic foot underground storm water detention facility will be built. All buildings will be constructed so as to manage the first 1" of rainfall. What is not clear – and should be ascertained before moving forward – is whether this is sufficient given predicted increases in precipitation due to climate change.

In addition, the Master Plan relies primarily on open spaces and green roofs for storm water management. This is simply insufficient. The development of this site will create more impervious surface. According to the SID, there will be 14 additional acres of impervious surface compared to today. This will create new flood risks for an area that is already at heightened risk for flooding by virtue of its location. The use of permeable surface materials and designing to live with water is critical for the management of flood risk at this site.

The Master Plan also includes “facilitating” a study on the feasibility of a berm as part of a regional flood protection effort. What is not clear is why this would be done towards the end of the development rather than at

the start. The feasibility of a berm might be hampered by the development itself indicating that any such study be done as part of the first phase of development.


Recommendation: The Master Plan should not be approved until appropriate analyses of the flood risk from climate change related increases in precipitation are conducted to determine whether the floors included in the Master Plan are sufficient. The BPDA should be able to say with some level of meaningful certainty how much flooding each of the proposed measures will prevent. Flood mitigation and adaptation analyses should be not be based on FEMA flood maps which do not take into account climate change impacts. These analyses should be done to be most protective of users and residents at Suffolk Downs and should prevent any increases in risk of flooding to the surrounding neighborhoods.

Recommendation: The Master Plan should require minimization of impervious surfaces throughout the site. The use of permeable roadway and sidewalk materials should be required at the maximum level possible

The most glaring shortcoming in the Master Plan is the complete lack of transportation planning or analysis. As someone who uses Route 1A to get to work, we can attest to the worsening commutes for everyone who uses this roadway. Our commute is a “reverse commute” up to Salem State University and yet even we get caught in traffic at or before the Courtyard Marriott Hotel, long before the intersection with Boardman Street, as late as 10 am in the morning. At that hour, Boston-bound traffic is not infrequently backed up to Bell Circle in Revere. Given the size of the development, and the increased use of TNCs, which the SID makes clear the Suffolk Downs development will accommodate, negative impacts to Route 1A are inevitable and likely will be quite severe. What is clear is that there has not been a traffic study, which is unacceptable. After-the-fact traffic mitigation promises as seen in this Master Plan are insupportable without a thorough traffic study.

Recommendation: The Master Plan should not be approved until after a thorough traffic study on current conditions and modeled impacts is completed and shared with the community. The study should at minimum address in detail impacts on the potential increase in the number of vehicles, the direction of traffic, the impact on commute times in both directions of Route 1A, as well as air quality impacts associated with the increased traffic.

We appreciate the opportunity to share our comments on the proposed Master Plan. Do not hesitate to contact us with any questions.

The image shows two handwritten signatures in black ink. The signature on the left is 'Neenah' and the signature on the right is 'Marcos'.

Neenah Estrella-Luna & Marcos Luna



Tim Czerwienski <tim.czerwienski@boston.gov>

My comments on SD PDA from climate justice perspective

Kannan Thiru

Fri, May 31, 2019 at 10:09 AM

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

Suffolk Downs as a Climate Shelter

The Suffolk Downs development, by virtue of being an island of resilience, can benefit two groups of people:

- 1. People in the North Suffolk region temporarily displaced by an emergency such as flooding. The development must offer shelter for such people.*
- 2. People in the North Suffolk region who must permanent relocate due to worsening climate conditions.*

Given that 100-year storms are becoming more and more frequent, and we have witnessed a few 500-year storms in the past decade, and that hurricanes are making it further and further north due to the warming oceans, during the 20 year development period at SD, East Boston and other coastal neighborhoods around Suffolk Downs are likely to face some extreme weather events and consequences due to the globally destabilized and quickly deteriorating climate system. Some of these events may trigger minor emergencies, while others may precipitate long-lasting effects on people's lives: people may be displaced from their homes, temporarily or permanently. Such displacement may be triggered by flooding, or prohibitive flood insurance costs, or the fear of either, or other effects indirectly linked to risks posed by climate change. When folks are thus displaced, SD can be a place that provides refuge and shelter as the situation warrants. To this end, HYM must build provisions that can serve as temporary shelter for displaced communities. As it is also likely that people will be displaced permanently, HYM must prioritize housing for local applicants who are thus displaced or at risk of such displacement. HYM may work with government agencies on planning for these services, but given the complexity of this issue, this cannot be left to government agencies to address solely on their own at their own pace. It is incumbent upon large developments--currently in plan and certain to happen--which, by virtue of their consideration of 2070 1% flood levels, are likely to be islands of resilience to go the additional distance to set up to make room for those who are living in old housing stock in and near flood zones, referred to as oceans of vulnerability, when the need arises.

Note that even homes in higher elevations (like those in Orient Heights) are vulnerable to extreme weather as demonstrated by a mudslide in September 2017 caused by a cloudburst. If it had any worse, this mudslide would have seriously impacted abutting foundations: <https://eastbostongreenway.com/2018/09/09/i-hope-it-doesnt-stop-there/>

Note also that even if people are not flooded, they may be cut off from water supply and heat. During Summer, people, especially elderly, are vulnerable to extreme heat and may be more susceptible due to social isolation.

The final project plan should include a comprehensive temporary shelter program that is developed in partnership with the city and the state, with details about pre-notification, designated location of the shelter, emergency transportation plan of people to the shelter, stocking of supplies including food, water, and medicine, etc. The shelter should be constructed and stocked during the early phases of the project. As we

all can recall, during Katrina, it was the lack of preparation that led to the pathetic experience of communities completely unbecoming of a developed nation.

--

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



Tim Czerwienski <tim.czerwienski@boston.gov>

Suffolk Downs Comments

Kristen Veit

Fri, May 31, 2019 at 3:22 PM

To: tim.czerwienski@boston.gov
Cc: lydia.edwards@boston.gov,
Gabriela.Coletta@boston.gov

Hi Tim,

We hope that you're well. We understand that today is the final day of the public comment period for the Suffolk Downs development. We have compiled here all of our comments and questions with respect to the development. We have attended many public meetings and read extensively through the material provided online. Many of the big questions that we had at the beginning of the comment period remain today. We are eager to speak on the record with you or someone at the BPDA about all of our questions, big and small.

Thank you,
Matthew Walsh & Kristen Veit
84 Webster St, #2

General neighborhood questions:

- Who are the target residents for this neighborhood? Where are they coming from? What is being done to attract them?
- What kind of "neighborhood feel" is the development aiming for? What existing neighborhood in Boston would best reflect what the developers have in mind for the Suffolk Downs development?
- Are there any explicit provisions being made to have the character of Suffolk Downs reflect that of East Boston and Revere? If so, what are they? How do the developers plan to respect the working class, ethnically diverse neighborhoods surrounding Suffolk Downs?

Questions about HYM:

- What are previous projects carried out by HYM Investment Group? I can only find three: the Bruins training facility at [80 Guest Street](#) and two luxury apartment buildings, the Twenty|20 in Cambridge and Waterside Palace in the Seaport. I am concerned that the Twenty|20 building does not reflect the character of the Cambridge neighborhood, and while the Waterside Palace does reflect the character of the Seaport, the Seaport is widely regarded as uncharacteristic of Boston as a whole. Quotes also praise how quickly HYM works, and while efficiency may be a virtue, haste is not. I am curious how the BPDA came to work with HYM and what of HYM's previous work the BPDA hopes to see reflected in the Suffolk Downs development.
- In general I am interested in greater transparency into HYM Investment Group. First, I am keen to know where the capital for their development is coming from. Second, I see that HYM has a long history of working alongside corporate partners, and I am interested whether there are corporate partners for the Suffolk Downs projects.
- How long will HYM hold on to the development? In other projects similar to this one, does the developer normally hold on to the property for the full length of the contract? What happens when a developer sells?
- I am skeptical of HYM's incorporation in Delaware. Businesses that are incorporated in Delaware (but don't do business there) do not pay state corporate income tax, and stock shares owned by people outside Delaware are not subject to Delaware taxes. That's a sensible arrangement for HYM and its investors, but it makes me nervous that HYM is dodging its greater public responsibilities. In light of this, I am interested in learning more about the following aspects of the arrangement between the BPDA and HYM:
 - I believe that the BPDA earns its revenue from developers' budgets. How much revenue does the BPDA serve to gain from the Suffolk Downs development? How does that compare to other developments?
 - It seems possible to me that HYM is exempt from certain taxes given their role as developer in this project. What taxes is HYM exempt from paying? What taxes will HYM not be paying that a developer incorporated in Boston (and working in Boston, as HYM is) would be paying?
 - What other incentives is HYM receiving, if any?

Governmental and Nongovernmental Structure in Suffolk Downs

- Will Suffolk Downs have a local government?
- What will the relationship be between residents in Suffolk Downs and the cities of Boston and Revere? For example, how will residents lodge a complaint about potholes or bent street signs? How will Boston and Revere

coordinate the provision of social services?

- How do the developers and the BPDA hope to encourage a robust civic sector? Even within my small corner of East Boston we benefit from active neighborhood associations, public gardens like Eastie Farm, social organizations like Zumix, soup kitchens, and more. Only a small section of the Master Plan speaks about space set aside for civic purposes: 2,500 sq. ft. But even within the Master Plan this space could be reduced (see note below). What ideas of civic presence undergird the plans for Suffolk Downs held by HYM and the BPDA?

Housing

- How many units of housing are produced in each phase?
- How many inclusionary development units are produced each phase?
- How many units of housing are produced per building type (eg., senior, affordable, townhomes, apartments, mixed-use, single-family, etc., for all building types)?
- What is the estimated Residential Gross Floor Area per IDP unit? As necessary, please clarify distinctions per building model or type.
- What is the estimated cost per IDP unit?
- What is the level of affordability per IDP unit? That is, what percentage of the AMI qualifies as affordable, and what is the AMI for the Suffolk Downs area? I believe that we should use a different metric than AMI for affordability. Affordability could be household income less than \$50,000, for example.
- Would it be possible to set aside land for public land trust to maintain affordable housing, much like the Dudley Neighbors Incorporated Community Land Trust?
- I would strongly like to see more than 13% affordable housing.
- Please clarify the following sections:
 - "Included in the total number of affordable units, 13% of the senior housing units will be affordable units under the IDP." – Would it be possible under this agreement to have 10% of units senior and affordable and only 3% not senior and affordable? Or does this sentence preclude that possibility?
 - "Each building that includes residential uses shall provide the affordable housing units on site as required by the IDP, or subject to the approval of the BPDA, the Proponent may redistribute the affordable housing units to other buildings or provide the affordable housing at an off-site location." – Does this sentence enable the affordable housing units to be built outside of the Suffolk Downs space? If so I would like to see this provision removed from the Master Plan.

Services

- In the Master Plan I saw no mention of the following social services:
 - Education – Is there a school planned? Where will children attend school if not? How will they get there? Are there plans for a library? If not, why not specify these buildings in the Master Plan?
 - Health – Is there a hospital planned? A health clinic? If not, how are the residents of Suffolk Downs expected to manage their health needs?
 - Government buildings – In fact, I saw no mention of any building related to the public welfare. Are there any social services that will be offered in Suffolk Downs?
- What will be possible in the 2,500 sq. ft. set aside for civic space? Pool? Fields? Courts? Conference rooms? What kinds of things won't be possible in the space?

Economy

- Do the developers expect that people will be living where they're working, or will the development cater primarily to commuters? What specific design choices are being made with respect to the response to that question?
- HYM has given a commitment of job training in the amount of \$1,000,000. What will that look like specifically?
- The Master Plan says, "Among its many other anticipated benefits, the Master Project is expected to: [...] Diversify and expand East Boston's economic and job opportunities through the incorporation of commercial uses, including office, lab, retail and hotel uses, providing a wide range of options for a broad spectrum of residents." – The City of Boston is one of the major employers in Boston, and the City of Revere is a major employer in Revere. How much employment will come from the public sector in Suffolk Downs?
- The Master Plan says, "...inclusion of an approximately 10% allocation of retail space in the Master Project to local businesses with flexible lease terms pursuant to a plan to be approved by the BPDA prior to the commencement of construction of the first building within the PDA Area." – What counts as "local" here?
- "Generate substantial economic benefits to the City of Boston through new net tax revenue." – What taxes specifically? What is the total estimated tax revenue to the city of Boston 10 years after completion? Please also provide a rough estimate tax revenue to the City of Boston for Phase I buildings, as proposed. Finally please provide a rough estimate of tax revenue to the City of Boston for all buildings, assuming project completion as proposed.
- The Master Plan says, "[The Suffolk Downs project will] Generate housing and jobs linkage funds to the City of Boston as required by Section 80B-7(3)(a) of the Code, in accordance with a Master Development Impact Project Agreement to be executed by the Proponent and the BPDA (the "Master DIP Agreement"), and individual Development Impact Project Agreements to effectuate the terms of the Master DIP Agreement that shall be executed by the owner of each building containing Development Impact Uses prior to issuance of the building permit for such building. The Housing Contribution Grant rate and the Jobs Contribution Grant rate

shall be \$9.03 and \$1.78 per square foot of Gross Floor Area of Development Impact Uses in the PDA Area, subject to an exception for the first 100,000 square feet of Gross Floor Area of Development Impact Project Uses in the Master Project.” – I don’t understand any of this, and I would appreciate any clarification that you can offer.

- The Master Plan says the project will “Invest more than \$170 million in public roadways, sidewalks, bicycle paths and pedestrian paths, water, sewer and storm drainage facilities, and open space areas to create robust public infrastructure for the Master Project at no cost to the City of Boston.” – I would like to see this \$170 million itemized.
- I would like to see the Master Plan state explicitly that it will use unionized labor during construction.
- How will it be determined which businesses get retail space? Are there any restrictions on the businesses (eg., only stores with fewer than two locations, or no chain stores)? I am interested in local business that are not chain establishments.

Open Space

- Who maintains streets, parks, and sidewalks? If not the local government, what measures of accountability will exist for whoever maintains those spaces?
- The Master Plan says, “This will include provision of an extensive, 27-acre (25% of the PDA Area) publicly accessible open space system in Boston, together with an additional 13 acres of publicly accessible open space in Revere (25% of the Revere portion of the Suffolk Downs Site), all of which will be available to Boston residents.” – How much of this is open park space versus connecting sidewalks, etc. How many full soccer fields fit within the open space? In an earlier presentation it came out that only 15.25 acres are genuine open public space, compared to the 40 acres cited, and that most green space is around roads and sidewalks. Can the Master Plan be adapted to increase the amount of genuine open space?
- “Approximately 25% of the overall PDA Area will be developed and maintained by the Proponent as publicly accessible open space in Boston, together with additional publicly accessible open space in Revere that will be available for use by Boston residents.” – It’s really very startling to me that the open space in the Suffolk Downs development won’t be truly public. There is no guarantee that my rights to association, speech, and others will be respected in this space. Why can’t this space be ceded to the City of Boston to be maintained by the Parks Department?
- “All of the open space areas located within the Master Project will be operated and maintained by the Proponent or the association of building owners at no cost to the City of Boston” – Is it that the City of Boston is not interested in maintaining the space? If the issue is cost, an arrangement could be made wherein the cost is covered by HYM but the land is still public.

Transportation

- What is the full plan to service Suffolk Downs with public transportation?
- What amount of parking will be given to car-sharing services?
- Other than the vague traffic monitoring stipulation, what accountability measures exist if traffic on 1A or elsewhere becomes noticeably worse for residents and commuters?
- Where will parking spots be? What fraction is indoor vs outdoor (or street vs building)? What will be the cost of parking for residents? How will the City of Boston administer parking passes? Are bike-sharing spots included in the total number of parking spots?
- Are there plans to improve the streets surrounding Suffolk Downs? Which streets and how? What is the estimated cost of that improvement, and on what timeline would the improvement take place?
- Are there plans for additional Blue Line trains? Will HYM contribute part of the finances for that? What does the City of Boston estimate for the cost of any changes to public transportation?
- Will construction during any of the Phases affect the Suffolk Downs MBTA Blue Line station?
- The Master Plan says, “...shuttle bus service serving the Suffolk Downs Blue Line Station, shuttle bus service to off-site locations, and bike-sharing facilities, all to be provided as part of the Master Project.” – Mention of shuttle buses but no public buses – who will operate the shuttles? Why not MBTA buses? Are there any MBTA bus routes that connect Suffolk Downs to the cities of Boston or Revere? If the shuttles are not managed by the MBTA, how will subsidies for the MBTA transfer to the shuttles? How much will the shuttles cost compared to the MBTA?
- The Master Plan says, “The Master Transportation Improvement Agreement shall require the Proponent to provide annual monitoring including traffic monitoring, transit 9 EAST\162476672.15 ridership and occupancy monitoring as appropriate for assessing traffic and transit impacts of the Master Project in the Suffolk Downs District.” – What are the specifics statistics stipulated here, how will they be calculated, and what will the cities of Boston and Revere do with the information? I would like a provision to make all of this data public.
- The Master Plan says, “Parking uses, including, but not limited to, parking garages; on-street parking; vehicle cleaning services, car-sharing and/or bicycle-sharing service and vehicle rental agency principally for residents, employees and visitors to the Suffolk Downs Site and surrounding neighborhoods.” – What does it mean that vehicle cleaning services, car-sharing, bike-sharing, and vehicle rental agencies are included as “Parking and Vehicular Uses”?

Environment

- What provision guarantees that each building in Suffolk Downs will comply with environmental and resiliency policies?
- What is the overall resiliency plan for Suffolk Downs? Does this plan account for any environmental degradation that might occur during the years of development and construction? Has HYM contracted with environmental experts to coordinate environmental and resiliency plans?
- If expanding the bike route into the marsh as one of the documents online indicates, what consideration will be given to the ecosystem there?
- Are there any plans for alternative energy sources? Incentives for solar power in the new commercial or residential buildings?

Interim

- How can the development of Suffolk Downs address the current displacement issue?

Process

- The Master Plan specifies a variety of ways that the plan can be changed in the future. These include but are not limited to the below passages. What will be the ability for community input during these processes? Where's the allowance for a public voice?
 - "Based upon the approval of this Master Plan and approval of one or more PDA Development Plans, final plans and specifications for each building will be submitted to the BPDA pursuant to Articles 80B and 80C of the Code for final design review approval and certifications as to consistency and compliance with this Master Plan and the applicable PDA Development Plan."
 - "The specific requirements for land, buildings, streets and open space included in each Phase, and their location and use, shall be as set forth in the PDA Development Plan applicable to each Phase and may be modified as set forth in such PDA Development Plan. In the event of any conflict between this Master Plan and a PDA Development Plan, the provisions of the PDA Development Plan shall govern."
 - "Other Approvals. The design of the individual buildings will be subject to review by the Boston Civic Design Commission, and to further review by the BPDA of the schematic design, design development and construction drawings, pursuant to the BPDA's Development Review Guidelines and Article 80B of the Zoning Code. Aspects of the Master Project may also require approvals of other governmental agencies, such as the City of Boston's Public Improvement Commission and the Boston Conservation Commission. No permits for any elements of the Master Project included in this Master Plan, as the same may be amended, shall be required from the Zoning Board of Appeals. In addition, each of the Phases and the buildings and improvements to be incorporated in them, will be subject to one or more PDA Development Plans submitted and approved in accordance with Article 80C of the Zoning Code."
 - Why is there a cutout in the Orient Heights exception for a hotel?
 - The Master Plan says, "At the Proponent's request, with the approval of the BPDA, unused Gross Floor Area may be reallocated from one Phase to another Phase, provided that the Total Gross Floor Area, Residential Gross Floor Area and Non-Residential Gross Floor Area in any Phase may not be increased by more than 10% without an amendment of this Master Plan and of the applicable Development Plan as may be determined by the BPDA." – How are amendments made? Why an increase in 10%? An increase in 10% of the Non-Residential Gross Floor Area at the expense of Residential Gross Floor Area could mean a decrease of 4% for the latter, and an increase of 10% of the Residential Gross Floor Area could mean a decrease of 23% for the Non-Residential Gross Floor Area. That's a large range of acceptable change, and it makes me skeptical of this Master Plan. That amount of change, for example, could cut out the whole space cut out for a civic center.
 - In general, what avenues are available for community input after today?

Dan Bailey
73 Eutaw Street
East Boston, MA 02128

Tim Czerwienski
Boston Planning and Development Agency
tim.czerwienski@boston.gov

Re: Suffolk Downs PDA Comment Letter

Dear Mr. Czerwienski,

The redevelopment of Suffolk Downs represents an extraordinary opportunity to build a new neighborhood from scratch. This is a chance for the City of Boston and its residents to create a more equitable, just, and humane city. Instead, the Suffolk Downs Master Plan in its current form shows a stunning lack of imagination. The Plan doesn't seem to be motivated by any shared values or principles beyond the view that private development is Boston's greatest goal and truest measure of success. The Plan's business-as-usual approach does little to address the greatest challenges facing Boston today – equity in housing and transportation, and creating a more sustainable and climate-resilient city.

The Suffolk Downs development plan is unprecedented in scale and scope. Once complete, the project will increase the number of housing units in East Boston by approximately 50%, while adding millions of square feet of commercial space. Given the magnitude of the proposal, entrusting its design and execution to a single private developer with no public accountability is reckless. The Master Plan describes a neighborhood where everything is privatized, not only the buildings, but the streets, parking, transportation system, and parkland. This means that members of the public who use this infrastructure will have no say in how it is managed or maintained.

It's hard to see how there's any room for a concept of public good in any of this. The Master Plan assumes that the interests of the public and the interests of the private developer are completely aligned, ignoring many instances where the Plan does not prioritize the public good. If the City is incapable of acting on behalf of the public by taking a direct role in building and managing critical aspects of Suffolk Downs, it should at least take a more active role in planning and regulating the development. To begin, the developer should not be allowed to write their own master plan for the City to approve. Instead, **the City should propose a master plan based on public input as the starting point for negotiations with the developer.**

If I could propose a single guiding principle and overarching goal for the redevelopment of Suffolk Downs it would be this: Suffolk Downs should be a community that is an extension of the surrounding East Boston community. Once the project is complete, the residents of Suffolk Downs should mirror the makeup of the broader East Boston community in terms of

socioeconomic status and race as closely as possible. If we fail in this goal, we will have created a segregated enclave at the edge of East Boston.

In order to support the Suffolk Downs proposal, I would like to see most of the following recommendations integrated into the Master Plan:

Housing

In order to build an equitable neighborhood at Suffolk Downs, the City needs to ensure that housing on the site will be affordable for individuals now living in East Boston, where the median income is approximately \$47,000. The Master Plan calls for 13% of all housing to be income-restricted “affordable” units, which is the minimum number required by Boston’s inclusionary development policy. Given that 15-18% of all housing in East Boston is currently income-restricted “affordable” units, the 13% affordable proposal at Suffolk Downs will actually dilute the neighborhood’s supply of affordable housing, something we just can’t afford to do. Even the current supply of affordable housing in East Boston is inadequate – Neighborhood of Affordable Housing CDC recently received over 700 applications for 40 available affordable units in their Coppersmith Village development on Border Street. Further diluting the neighborhood’s supply of affordable housing at Suffolk Downs is likely to fuel displacement in East Boston and increase the likelihood that Suffolk Downs will be a segregated community. To mitigate this outcome, **the affordable housing requirement should be increased from 13% to 20% or more at Suffolk Downs. Affordable housing at Suffolk Downs should also be dispersed across the site and integrated with market-rate housing**, rather than concentrated in one place. Affordable and market-rate units should share the same amenities.

Increasing the number of affordable units that are required to be built at Suffolk Downs is a necessary starting point, but is probably insufficient on its own. The fact is, private development by itself is incapable of solving Boston’s affordability crisis – market forces have never provided adequate housing for poor and working people. With this in mind, the City should use the Suffolk Downs Master Planning process as an opportunity to reexamine its priorities and revise its affordable housing policies. The Area Median Income used to determine affordable housing costs in Boston is \$98,500, while the actual median income in East Boston is approximately \$47,000. This discrepancy means that even designated “affordable” housing is not truly affordable for a sizeable proportion of East Boston residents. **The City needs to use a more realistic income to calculate affordable housing costs.** Perhaps more importantly, the City needs to begin directly investing public funds in the construction of affordable housing. **A certain proportion of the land at Suffolk Downs should be transferred to City ownership, and the City should construct affordable housing on this land.** The City should designate a proportion of the revenue generated from property taxes on new development at Suffolk Downs for use in the construction of affordable housing on the site.

Transportation

The Suffolk Downs Master Plan bills the project as a “transit oriented development”. However, the project appears to be transit oriented in name only. The Plan argues that the proposal qualifies as “transit oriented development” simply because two T stations are located at the site’s periphery. Beyond this relative proximity to the Blue Line, the Plan fails to apply the principles of transit oriented development – the proposed oversized buildings, oversized block structure, wide streets, and large amount of parking suggest that cars will be prioritized over walking and other alternative modes of transit at the new Suffolk Downs. The Plan claims that streets will be “pedestrian and bicycle friendly” but fails to explain what that means. Given the size of the streets and the complete lack of human scale in the site’s proposed architecture and layout, I find it hard to believe that these streets will ever be a joy to walk on.

With automobile congestion in East Boston at crisis levels, the goal should be to minimize the number of additional cars that the Suffolk Downs redevelopment will bring to the neighborhood. The most effective way to accomplish this goal is to severely restrict the amount of parking on the site. The current Plan calls for 7,216 parking spaces. Adding 7,216 cars to the neighborhood is unacceptable and will have disastrous implications for East Boston, increasing congestion and leading to worsening air pollution, loss of economic productivity, and loss of mobility for those who rely on cars for transportation. **The Master Plan should define a strict parking maximum at Suffolk Downs well below the currently proposed 7,216 spaces.**

The proposed roadway improvements to Route 1A, presumably an attempt to mitigate the additional traffic associated with Suffolk Downs redevelopment, will invariably fail to reduce congestion. Increasing road capacity is known to create induced demand, where additional capacity is quickly filled and exceeded. What’s more, the Sumner Tunnel acts as a bottleneck, preventing increased capacity on 1A from reducing congestion, even temporarily.

Rather than waste millions of dollars expanding Route 1A, this money should be invested in public transportation. As a daily commuter on the Blue Line, I can confirm that the Blue Line is often at full capacity during rush hour. If thousands of new residents at Suffolk Downs are expected to use the T, **the Plan for Suffolk Downs must include money to upgrade the Blue Line**, adding more trains and modernizing the signal system to allow trains to be run closer together during rush hour. At least one additional MBTA bus route that services Suffolk Downs and the surrounding area should also be implemented. The Plan should also contribute money toward a red-blue connector to link Suffolk Downs to jobs in Cambridge.

The Suffolk Downs site should be designed to prioritize people over cars. Streets should be narrow, and main thoroughfares should be pedestrian only. In order to make the site truly transit oriented, the Plan should consider rerouting the Blue Line through the center of the site. Instead of the proposed private shuttles, the developer of Suffolk Downs should fund MBTA bus service in dedicated bus lanes on the site, and provide additional funding to the MBTA to subsidize public transit to key locations off site if required.

Public Benefit

An honest accounting of the potential public costs and benefits of redevelopment at Suffolk Downs is essential to making informed decisions about the project's design and direction. But this accounting is nowhere to be found in the Master Plan. Instead, the Plan provides a list of anticipated public benefits but fails to even consider the possibility that the project will burden the public in certain ways as well.

A primary benefit cited in the Plan is the creation of additional housing in East Boston. While there are benefits to creating new housing, it's also important to recognize that a large new development like Suffolk Downs is likely to have unintended negative consequences as well. In particular, the evidence suggests that new development, especially in urban neighborhoods like East Boston, often leads to acute increases in housing costs in surrounding areas, exacerbating inequality and fueling displacement of existing residents (Rodríguez-Pose, Andrés & Storper, Michael, 2019. "[Housing, urban growth and inequalities: The limits to deregulation and upzoning in reducing economic and spatial inequality](#)," [CEPR Discussion Papers](#) 13713, C.E.P.R. Discussion Papers.). Fair mitigation for this impact would likely involve providing or supporting affordable housing in East Boston well beyond what is currently proposed. Other public costs associated with the Suffolk Downs development, including increased traffic congestion, reduced air quality, loss of existing tree canopy on the site, and more, will require further study and consideration in order to determine appropriate mitigation strategies.

The public benefits and mitigation measures currently outlined in the Master Plan are largely limited to the construction of the development project itself. I suspect that **fully reckoning with the public costs of the project will reveal that the proposed mitigation measures are woefully insufficient.**

Open Space and Public Access

The proposed "civic and public realm amenities" can never truly be public or civic as long as they are privately owned. For a space to be truly public, it must be owned by the public, and the public must have a say in how the space is managed. The Master Plan stipulates that certain key pieces of utility infrastructure will be constructed by the developer and transferred at no cost to the appropriate state or city entity upon completion. This same process should be applied to the site's open space and parkland: **the developer should construct parks and open space and transfer ownership of these spaces to the City once they are complete.** The developer should then pay an annual maintenance fee to the City in perpetuity to support upkeep of these spaces.

In order to fully integrate Suffolk Downs into the East Boston community, **the site must include other public facilities beyond open space, including space for the neighborhood's homeless population, a health clinic, and a school.**

Architecture and Design

Rather than imagining the neighborhood of the future, the Suffolk Downs proposal looks backward, appearing to draw inspiration from the 1950s “towers in the park” model of development. The proposed design and layout of the site lack any sense of human scale. Monolithic buildings are organized into vast superblocks, bordered by wide, car-friendly streets. Contrary to the claims of the Master Plan, this does not appear to be a neighborhood designed to be enjoyed at street level. In the aerial rendering of the proposal, the scale of Suffolk Downs more closely resembles the nearby fuel tank storage facility than the residential neighborhoods of East Boston that stretch out to the south and west.

If Suffolk Downs is to be an extension of the surrounding East Boston community, it should more closely resemble East Boston’s existing neighborhoods in scale and granularity. East Boston’s relatively narrow streets and fine grained block structure make it a wonderful neighborhood to explore and interact with on foot. The neighborhood’s human-scale architecture makes for lively and vibrant streets. **East Boston’s existing development pattern can and should be replicated at Suffolk Downs by subdividing the proposed superblocks into smaller building lots.** Ideally, these smaller building lots would be sold and developed separately, giving rise to an appropriately scaled and architecturally diverse streetscape. This model of development would also significantly reduce the risks associated with allowing a single developer complete control over the project.

Environmental Sustainability

The Master Plan’s commitment to building to Passive House and Leed standards is laudable, but could go further to **support Boston’s goal of fully decarbonizing by 2050**. No natural gas lines should be installed on the site, and all utilities should be fully electrified. The Master Plan contemplates installing rooftop solar, but should instead include a firm commitment to install a specified amount of solar generation on site during each phase of the project. Although not mentioned in the Master Plan, the project will involve removing vast numbers of mature trees from the site. Although some or all of these trees may eventually be replaced by street trees, we can’t afford to remove mature trees and replace them with saplings – mature trees provide significant environmental, psychological, and aesthetic benefits, reducing the urban heat island effect, controlling stormwater runoff, and bringing a sense of the natural world to the city. A greater effort should be made to plan around existing mature trees, preserving them and incorporating them into the site design.

Sincerely,
Dan Bailey



May 31, 2019

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

Delivered via email: tim.czerwinski@boston.gov

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

Dear Director Golden:

It is with great concern that we submit the following comments regarding the proposed Master Plan for the Suffolk Downs DPA. These comments are informed by the published PDA documents released on February 1, 2019, the Supplemental Information Document (dated May 1, 2019) and our attendance of many public meetings held by the BPDA and the developer (HYM Investment Group), including Impact Advisory Group meetings. GreenRoots is a local environmental justice non-profit organization that advocates on behalf of low income communities and communities of color in the immediate area.

Our greatest concern is the speed with which this process is moving given that the Suffolk Downs Development project proposed by HYM Investment Group is the largest privately-owned and managed land development project in recent history in Boston, if not in its history. HYM will create an entirely new neighborhood, including all aspects of infrastructure that would normally be constructed and managed by public entities, at a moment when Boston confronts two crises, one of housing and one of climate change, that represent equally unparalleled moments in the history of our City. As such we would first and most urgently insist that the City slow this permitting process to fully vet the impacts of the project and ensure that we are taking full advantage of the opportunity this project represents for the benefit of current and future Bostonians. We have made this same request in our comments to the Draft Project Impact Report (DPIR) and feel that the 30-day extension which has been added to this DPA comment period, while appreciated, is hardly adequate.

Again, echoing the comments we have previously submitted in this process, for a project of this scale and impact it is unreasonable to expect a single developer to be able to address all the issues that are of concern to the public. It will require a collaborative effort of the private and public sectors to ensure that the long term public good takes a priority over simply getting the project done. That kind of process is not a simple one and requires the necessary investment of time to ensure that it is done right and with the full understanding and participation of the public that will most directly be impacted.

Environmental Justice/Enhanced Outreach

As an Environmental Justice community East Boston bears the burden of many regional infrastructure needs, such as Logan International Airport and all of its supporting ground infrastructure such as jet fuel tank farms, oil tank farms of home heating fuel and gasoline, and critical regional highway infrastructure, including the terminus of US Route 90, and three tunnels. The only majority Latinx

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neighborhood in the City of Boston the neighborhood is home to many working class families. We thank BPDA staff and HYM for being responsive to our early calls for better language accommodations, although the results have been mixed. Interpreters used for the public sessions have been poorly prepared for the subject matter and frequently the interpretation headsets have performed poorly. A dedicated Spanish-language public informational session ended up being dominated by English-speakers and interpretation quality was poor. As an organization that struggles with issues of multilingual justice we know full well the difficulty of hosting effective bilingual events. It is not easy. Unfortunately, the language access efforts have fallen short. Our own outreach efforts in the neighborhood have indicated that the Latinx community is woefully under-informed about the project, its details, the benefits proposed for the community and the project's impacts on the community.

Even beyond the Spanish-speaking community, we have encountered many other East Bostonians whose knowledge of the project is non-existent. Outreach in EJ communities is difficult as many people are working multiple jobs, managing families without much of a supportive social network, and are not prioritizing evening community meetings, even when food is provided. So although the "budget for pizza" may have run out, this is not the measure of effective community outreach.

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

We would also once again suggest to the BPDA that targeting the Latinx community with Spanish-language presentations and materials that can help them make sense of the processes of development and community engagement. For those who have recently immigrated to this country and/or have never been engaged in municipal and state planning processes, there is a great deal of confusion of how things operate. There are many in the community who are expecting some sort of a vote, similar to what they experienced with the casino referendum a few years ago. Clearly, community engagement in these complex processes cannot be expected to be robust or authentic if it is uninformed.

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

For these reasons we would again reiterate the need for additional time to better inform the community of the details of the project and the opportunity and potential threat it represents for current East Boston residents. We also once again offer to work with the BPDA staff and HYM to help in these processes where we are able.

Energy and Sustainability

The project has progressed in this area from the original proposal and we thank HYM for responding to the comments that have been made. Even so we feel that the unprecedented nature of this project requires that City require more. The build-out of this project is scheduled over the next twenty years and its impacts will be for generations to come. The creation of an entire neighborhood on the blank slate which is the Suffolk Downs property affords us the opportunity to create something that is truly going to reflect the Boston of the future and not simply be almost the state of the art in sustainability,

circa 2015. If at the end of the twenty year build out we have a neighborhood that still needs to be upgraded, we will have failed.

In particular, the blank slate nature of this development and the fact that it is being developed by one entity represents an ideal opportunity to dream big in terms of energy use and energy infrastructure design. If Boston wants to be a carbon-neutral city by 2050, then in 2040, when this neighborhood is theoretically built out, it should be an exemplar of how one goes about doing just that. If we cannot have features such as a district energy approach or a micro-grid in this area, or full distributed energy generation on site combined with drastic demand control and reduction mechanisms in place here, where can we?

HYM has indicated that many of these features are cost-prohibitive, especially since all of the infrastructure will be built by them. Then the City of Boston should be working with the HYM to see how those costs can be off-set. In fact, many of the benefits that are being provided are infrastructure investments which are the responsibility of State and the City – meaning the public. If some of those costs are assumed by the public, the developer could then focus their investment on the measures that will go beyond what the standard is and help to achieve the kinds of benefits that will highlight this project as a model for future developments.

While it is understood that the DPA will not set in stone the details of the entire development – as technologies evolve and costs come down, the state of the art will be incorporated into the phases of the development -- these kinds of investments should be explored and codified now.

Again, given the additional work that needs to go into that, we request that the establishment of the DPA be held off to explore these options.

Housing

Obviously housing affordability is the topic with the most direct impact on current and future residents of East Boston. While it is true that “no one is being displaced from Suffolk Downs” the project will have an enormous impact on the housing market surrounding the area. We can debate in public meetings whether that effect will be to introduce more housing units to meet demand and bring prices down or whether it will produce more investment properties that will continue to drive up prices and rents. But at this point there has been no analysis of what the impact of 10,000 housing units will be on housing prices in the region, much less East Boston. In the absence of such an analysis (and given the market-oriented nature of such an analysis, one would think some of these data would have been presented by the developer to its investors) it is impossible for a community to reasonably assess what is being offered in terms of levels of affordability and mitigation.

Ultimately the analysis of the housing impacts is critical as it feeds directly into our understanding of the displacement risks we contend the project represents to the surrounding neighbors. As such the PDA should contain within its agreements a mitigation plan addressing displacement.

Again, this project represents an unparalleled opportunity for addressing the housing crisis, but only if we take the time at the start to ensure that questions are answered before the PDA is signed.

We would like to also highlight and heartily endorse the opinions expressed in the comments that have been submitted by City Councilor Lydia Edwards, the FoAW Coalition, City Life/Vida Urbana, and the Conservation Law Foundation. Given the many complex issues that have been raised and the on-going need for further community outreach and input, as well as the extraordinary opportunity that this project encompasses, we cannot emphasize enough how important it is to take the time necessary to get the PDA right. We ask again for an extension of this review period.

In conclusion, we want to thank both BPDA and HYM staff for the efforts you have put into this process to date. It is noted and appreciated and we are available to help improve the effort in regards to outreach in the EJ communities of the area. Thank you again for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read 'John Walkey', with a stylized, flowing script.

John Walkey
Waterfront Initiative Coordinator
GreenRoots

Mara Gregory
73 Eutaw Street
East Boston, MA 02128

May 31, 2019

Tim Czerwienski
Boston Planning and Development Agency
tim.czerwienski@boston.gov

Re: Suffolk Downs PDA Comment Letter

Dear Mr. Czerwienski,

The redevelopment of Suffolk Downs represents an extraordinary opportunity to build a new neighborhood from scratch. This is a chance for the City of Boston and its residents to create a more equitable, just, and humane city. Instead, the Plan's business-as-usual approach is woefully inadequate to address the greatest challenges facing Boston today – equity in housing and transportation, and creating a more sustainable and climate-resilient city.

The Suffolk Downs development plan is unprecedented in scale and scope. Once complete, the project will increase the number of housing units in East Boston by approximately 50%, while adding millions of square feet of commercial space. The Master Plan describes a neighborhood where everything is privatized, not only the buildings, but the streets, parking, transportation system, and parkland. This means that members of the public who use this infrastructure will have no say in how it is managed or maintained. Given the magnitude of the proposal, entrusting its design and execution to a single private developer with no public accountability is reckless. The developer should not be allowed to write their own master plan for the City to approve. Instead, **the City should propose a master plan based on public input as the starting point for negotiations with the developer.**

In order to support the Suffolk Downs proposal, I would like to see most of the following recommendations integrated into the Master Plan:

Housing

In order to build an equitable neighborhood at Suffolk Downs, the City needs to ensure that housing on the site will be affordable for individuals now living in East Boston, where the median income is approximately \$47,000. The Master Plan calls for 13% of all housing to be income-restricted "affordable" units, which is the minimum number required by Boston's inclusionary development policy. Given that 15-18% of all housing in East Boston is currently income-restricted "affordable" units, the 13% affordable proposal at Suffolk Downs will actually dilute the neighborhood's supply of affordable housing, something we just can't afford to do.

Further diluting the neighborhood's supply of affordable housing is likely to fuel displacement in East Boston and increase the likelihood that Suffolk Downs will be a segregated community. To mitigate this outcome, **the affordable housing requirement should be increased from 13% to 20% or more at Suffolk Downs. Affordable housing at Suffolk Downs should also be dispersed across the site and integrated with market-rate housing.** Affordable and market-rate units should share the same amenities.

Furthermore, the Area Median Income used to determine affordable housing costs in Boston is \$98,500, while the actual median income in East Boston is approximately \$47,000. This discrepancy means that even designated "affordable" housing is not truly affordable for a sizeable proportion of East Boston residents. The City needs to use a more realistic income to calculate affordable housing costs. Perhaps more importantly, the City needs to begin directly investing public funds in the construction of affordable housing. **A certain proportion of the land at Suffolk Downs should be transferred to City ownership, and the City should construct affordable housing on this land.** The City should designate a proportion of the revenue generated from property taxes on new development at Suffolk Downs for use in the construction of affordable housing on the site.

Ultimately, Suffolk Downs should be a community that is an extension of the surrounding East Boston community. If we fail in this goal, we will have created a segregated enclave at the edge of East Boston.

Transportation

The Suffolk Downs Master Plan bills the project as a "transit oriented development". However, the project appears to be transit oriented in name only. The proposed oversized buildings, oversized block structure, wide streets, and large amount of parking suggest that cars will be prioritized over walking and other alternative modes of transit. With automobile congestion in East Boston at crisis levels, the goal should be to minimize the number of additional cars that the Suffolk Downs redevelopment will bring to the neighborhood. The most effective way to accomplish this goal is to restrict the amount of parking on the site. The current Plan calls for 7,216 parking spaces. Adding 7,216 cars to the neighborhood is unacceptable and will have disastrous implications for East Boston, increasing congestion and leading to worsening air pollution, loss of economic productivity, and loss of mobility for those who rely on cars for transportation. **The Master Plan should define a strict parking maximum at Suffolk Downs well below the currently proposed 7,216 spaces.**

The proposed roadway improvements to Route 1A, presumably an attempt to mitigate the additional traffic associated with Suffolk Downs redevelopment, will invariably fail to reduce congestion. Increasing road capacity is known to create induced demand, and the Sumner Tunnel acts as a bottleneck, preventing increased capacity on 1A from reducing congestion.

Rather than waste millions of dollars expanding Route 1A, this money should be invested in public transportation. As a daily commuter on the Blue Line, I can confirm that the Blue Line is often at full capacity during rush hour. If thousands of new residents at Suffolk Downs are expected to use the T, **the Plan for Suffolk Downs must include money to upgrade the Blue Line**, adding more trains and modernizing the signal system to allow trains to be run closer together during rush hour. At least one additional MBTA bus route that services Suffolk Downs and the surrounding area should also be implemented. The Plan should also contribute money toward a red-blue connector to link Suffolk Downs to jobs in Cambridge.

Public Access, Open Space, and Environmental Sustainability

Rather than imagining the neighborhood of the future, the Suffolk Downs proposal looks backward, appearing to draw inspiration from the 1950s “towers in the park” model of development. The proposed design and layout of the site lack any sense of human scale. Monolithic buildings are organized into vast superblocks, bordered by wide, car-friendly streets. Contrary to the claims of the Master Plan, this does not appear to be a neighborhood designed to be enjoyed at street level. **East Boston’s existing development pattern can and should be replicated at Suffolk Downs by subdividing the proposed superblocks into smaller building lots.** Ideally, these smaller building lots would be sold and developed separately, giving rise to an appropriately scaled and architecturally diverse streetscape.

Furthermore, the proposed “civic and public realm amenities” can never truly be public or civic as long as they are privately owned. The Master Plan stipulates that certain key pieces of utility infrastructure will be constructed by the developer and transferred at no cost to the appropriate state or city entity upon completion. This same process should be applied to the site’s open space and parkland: **the developer should construct parks and open space and transfer ownership of these spaces to the City once they are complete.** The developer should then pay an annual maintenance fee to the City in perpetuity to support upkeep of these spaces.

In order to fully integrate Suffolk Downs into the East Boston community, the site must include other public facilities beyond open space, including **space for the neighborhood’s homeless population, a health clinic, and a school.**

The Master Plan’s commitment to building to Passive House and Leed standards is laudable, but should go further to **support Boston’s goal of fully decarbonizing by 2050.** No natural gas lines should be installed on the site, and all utilities should be fully electrified. The Master Plan contemplates installing rooftop solar, but should instead include a firm commitment to install a specified amount of solar generation on site during each phase of the project. Although not mentioned in the Master Plan, the project will involve removing vast numbers of mature trees from the site. Mature trees provide significant environmental, psychological, and aesthetic benefits, reducing the urban heat island effect, controlling stormwater runoff, and bringing a sense of the natural world to the city. A greater effort should be made to plan around existing mature trees, preserving them and incorporating them into the site design.

Thank you for your consideration.

Sincerely,

Mara Gregory



Tim Czerwienski <tim.czerwienski@boston.gov>

Suffolk Downs

Fred Pucillo

To: tim.czerwienski@boston.gov

Fri, May 31, 2019 at 7:05 AM

Dear Mr. Czerwienski,

I write to you today as a nineteen year East Boston resident, son and grandson of East Boston residents, triple-decker property owner, and father of a teenager who is and has been enrolled in Boston Public Schools since K2. I thank you for your work in the difficult job of managing the Suffolk Downs HYM, LLC project for the BPDA. However, I do believe that the project overall would be *"injurious to the neighborhood or otherwise detrimental to the public welfare, weighing all the benefits and burdens"* and so I very much would like to see the project's current PDA not approved until such time as a study of the project's impacts to housing affordability and displacement in East Boston and Boston is commissioned and completed. Here are some of the reasons I say that.

1. Housing crisis.

As you know, East Boston is experiencing an unprecedented real estate boom and skyrocketing home values and rents. Three days ago at the East Boston Community Soup Kitchen where I volunteer I spent 45 minutes with yet another Eastie resident who lost her lease due to inability to pay rent. The refrain from this now homeless woman was "I never thought I would find myself in this situation. I'm a hard-worker." She joins many other folks I've met through the Soup Kitchen or church who either find themselves on the street or in a scramble to find new housing as their rents steeply-climb or they are simply evicted as the, usually new, owner flips the building for profit. This is besides children of neighbors I know who went to college, got a job, and want to stay in East Boston but are now priced out.

I pair that with the one to two cards, letters, or cold calls I get a week from investors seeking to buy my triple-decker for cash, and know that the real estate and housing system in our city has run off the rails. Adding thousands upon thousands more market-rate units to the mix in East Boston will not solve these issues and, in fact, could act as an accelerant on property values and so make them worse.

13% affordable units in Suffolk Downs is too low.

50% to 70% AMI is not affordable to the majority of my neighbors.

Thus, in the East Boston of today and the last several years, HYM, LLC's Suffolk Downs will quite likely be injurious to my neighbors' ability to stay in their neighborhood.

I have heard Mr. O'Brien, who I also would thank for his public-facing work on the project (and for volunteering at the EB Community Soup Kitchen), say that basically HYM, LLC's hands are tied by construction costs and federal, state, and city funding and policies when it comes to the issue of affordability.

But any progress we might be making towards sustaining a thriving, robust public welfare in the City of Boston will stall if we shrug our shoulders at the constraints of the "way things are." Although I'm sure there are real personal struggles and challenges in people's lives, I would bet not one of HYM LLC's employees or investors are homeless, or will be forced to move so far away from their job in search of housing they can afford that they'll need to take two buses and a train to get to work.

And, to the extent that Mr. O'Brien is correct, I'm very disappointed in my city, state, and federal officials as well. Did no one at the BPDA or Mayor's office read the Globe's 2017 Race in Boston series in which it was reported the net worth of black Bostonians is \$8.00? On the heels of building a largely white, affluent neighborhood like Seaport, how does the city then proceed to approve the sell off the largest parcel of land ever in the city to one development company and put very little innovative thinking or planning around how to work together to more fully include people of color in the stunning prosperity for some that is bursting out all around us. The system that is allowing this 10,000 unit (7,000 in Boston) development to focus on primarily (87%) very expensive housing in the midst of such a housing crisis seems to me at times like a more sophisticated, 21st century version of redlining.

2. Lack of families.

East Boston has been, since my grandparent's generation and beyond, a neighborhood of families. Although Suffolk Downs will have a few single family homes and a few larger apartments, it really is going to be a development for the lifestyle, work, and recreation of single people and couples. Sociological study after study tells us that the lifeblood of a healthy urban ecosystem is the family unit. Property is more likely to be maintained, small businesses are more likely to sprout, and more civic engagement is likely to happen when families are strongly represented in a city's community. The young, single folks I've met who are the newest wave of East Boston immigrants have, for the most part, been lovely people. But losing families from the center of East Boston life will have a negative ripple effect on the public welfare of all in the neighborhood.

Here again, I'm very disappointed that our city and state leaders not only did not find a way to have a more family-friendly neighborhood built. Was there an effort to envision, perhaps with partnering CDCs and other organizations, what a neighborhood that more closely paralleled the best of East Boston and Revere might look like? Although the Suffolk Downs development will increase Boston's tax base, if families are economically pushed out of the city, out of my neighborhood, a less visible contributor to the vitality that is attracting young professionals in the first place goes with them.

Finally, Mr. Czerwinski, so much of East Boston history is filled with other people's vision for our neighborhood. I know you know many of those stories--from the state's land grab for the airport, to the trucks the Maverick Street mothers stood against, to city officials working to place the predatory casino industry next to our schools and homes at Suffolk Downs. Now, that, all of a sudden, Eastie is the waterfront neighborhood that's the place to be, it seems like "luxury" condos and high-priced apartments are our lot. From evict and flip triple-deckers and 200% rent increases, to half-block sized buildings being cleared out of existing residents, we are now told that this is just how it is; how the system works.

Many East Bostonians aren't happy with that system. I feel like HYM, LLC's Suffolk Downs, though packaged in a kinder, gentler wrap, with a few tweaks to satisfy a few neighbors, is another vision that's going to be good for a few while being a burden to most of East Boston's current residents. And though it's just how the system works, I hope (and will work and vote) for the system to change so that we all have real access to good, sustainably affordable housing.

Sincerely,

Fred Pucillo

18 Ashley St.

3rd floor

East Boston, MA 02128



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

Re: Suffolk Downs Project

May 31st, 2019

Dear Mr. Czerwienski,

Thank for the opportunity to comment on the Suffolk Downs Redevelopment project. The Friends of the East Boston Greenway (Friends / FoEBG) strongly supports for the Suffolk Downs Project to include extension of the East Boston Greenway from Constitution Beach to Revere Beach with a separated shared-use path as well as improvements on-site for cycle tracks and bike paths.

The Suffolk Downs site is the nexus of East Boston, Revere, and Winthrop and sorely lacks suitable paths for bikers and walkers, but it lies close to the end of the existing East Boston Greenway and there are great opportunities for shared-use paths to Revere, as well as Winthrop. Without a system of connecting pathways, the project would be incomplete, and it would be impossible for it to truly connect to the surrounding communities. In addition, given the existing and severe traffic congestion in the area, the shared-use path would have the added benefit of reducing the number of vehicle trips to and along the project site.

We see that the "Suffolk Downs Redevelopment: Supplemental Information Document" (May 1, 2019) now includes, and has further outlined, additional details on the following public space improvements:

1. Walley Street Bicycle Connection: We support the addition of a cycle track on Walley Street as outlined in this plan. This is a key connection to the site and to the existing and future extensions of the East Boston Greenway.
2. Greenway Extension: The Friends support that the Proponent is committed to funding the preliminary design of the East Boston Greenway Extension from Constitution Beach

State Reserve to the southern end of Revere Beach State Reserve. This multi-use path should be least 12 feet wide.

3. Wayfinding: The Friends supports installing wayfinding signs along the Greenway.

The Friends would like to see improvements made at the intersection of Walley Street and Bennington Street so that people biking, and walking can cross safely. This connection is essential to enabling the public to use all of the walking and biking facilities.

In addition, the Friends have a long history of community engagement and building support around the existing East Boston Greenway. Community engagement will play a key role in the Suffolk Downs project. The Friends therefore urge BPDA to engage in a continuing dialog with established community leadership groups such as the Friends of East Boston Greenway, Friends of Belle Isle Marsh, and community partners from surrounding communities that will benefit from the Greenway. We would be happy to help support the project.

Lastly, we advocate for multi-use path extension design to be completed in Phase 1 of the project, for the reasons stated above.

Attached are Friends of East Boston Greenway's DEIR Comments submitted to EOEA. Please accept these comments as our PDA input.

How else can we help? Please let us know at eastbostongreenway@gmail.com

Sincerely,

A handwritten signature in dark ink, appearing to read "Karen Maddalena", is written over a light yellow rectangular highlight.

Karen Maddalena
President
Friends of the East Boston Greenway



January 15, 2019

Secretary Matthew A. Beaton
Executive Office of Energy and Environmental Affairs
MEPA Office
100 Cambridge Street, Suite 900
Boston, MA 02114
Sent via email to: page.czepiga@state.ma.us

RE: MEPA Project: 13796.01
Suffolk Downs Redevelopment Project: Draft Environmental Impact Report (DEIR)

Dear Secretary Beaton,

The Friends of the East Boston Greenway (The Friends), a local non-profit 501 C-3 and East Boston's primary open space advocacy group, works to expand and enhance East Boston's open space network. The Friends care for and work to achieve the continuation of the East Boston Greenway, a multi-use pedestrian and bike path which connects East Boston residents to open spaces and Boston Harbor over a 3.5-mile linear path. Our advocacy includes Greenway development and enhancements, and programming, maintenance and security issues, and climate change.

Our top priorities include:

1. Extending the East Boston Greenway from Constitution Beach to the Winthrop border at Belle Isle Inlet
2. Extending the East Boston Greenway from Constitution Beach to Beachmont Square
3. Improving access and programming across the entire Greenway
4. Creating safe, walkable pathways to Greenway access points, open spaces and harborwalks

Given our role, this letter addresses a community-wide scope and has been developed with the intention of communicating ideas not only with the Executive Office of Environmental Affairs (EOEA), the Department of Environmental Protection (DEP), and the project Proponent, but also with community stakeholders.

Open Space

The Friends commend the Proponent's commitment to open space in this Draft EIR. In East Boston's dense, urban built environment, open space is limited, with active park features in the highest demand (table below taken from the Friend's East Boston Parks Survey Report).

	Urban Farm	Foot Paths	Sitting Areas	Play-grounds	Bike Paths	Tennis Courts	Natural Areas	Restaurants		Sailing	Sports	Urban Gardens	Perfm areas	Farm Stand	Ice Skating	Splash Pools	Dog Park	Picnic Areas	Swim Areas	Carou-sel	Open Fields	Formal Gardens	Public Art
Jeffries Point	17%	77%	73%	63%	70%	50%	57%	57%	47%	50%	47%	60%	33%	53%	53%	37%	67%	53%	17%	33%	10%	43%	
Orient Heights	28%	60%	52%	36%	44%	24%	52%	32%	24%	24%	32%	32%	20%	44%	28%	52%	48%	40%	16%	44%	12%	32%	
Star of the Sea	8%	63%	33%	46%	38%	8%	25%	4%	17%	8%	13%	17%	13%	17%	50%	25%	17%	13%	13%	13%	13%	13%	
Maverick	17%	56%	50%	44%	44%	33%	39%	50%	33%	39%	22%	33%	44%	33%	28%	50%	61%	61%	17%	33%	17%	39%	
Eagle Hill	39%	74%	67%	59%	61%	33%	59%	36%	31%	43%	44%	49%	47%	44%	43%	41%	60%	53%	29%	36%	41%	41%	
Mount Carmel	18%	82%	45%	9%	36%	18%	0%	9%	18%	27%	18%	27%	27%	45%	18%	0%	18%	0%	0%	0%	9%	18%	

The Central Common

While the DEIR describes the large central 'Common' as 'allowing for informal play' the most requested features in our survey were footpaths, bike paths, athletic fields, playgrounds, and performance areas. With this in mind, the Friends Group would suggest that the Proponent engage residents and develop a more specific list of open space features, amenities, and programming for the Final EIR document. It is imperative that the Suffolk Downs development, which will add as many as 10,000 additional units of housing to the area, enhance the existing limited supply of open space amenities in the existing active, young urban community.

The DEIR does not specify how many, if any, or what type of sports fields will be built. The Friends recommend that a dedicated full-sized soccer field/facility be built since there is a strong interest in soccer in East Boston, but currently no dedicated soccer facility exists. The addition of residential units at Suffolk Downs will increase demand on an already inadequate recreational sports facility supply in East Boston. Considering existing and future need, the Friends estimate that four (4) soccer fields, one (1) full baseball diamond, two (2) Little League fields, three (3) basketball courts, eight (8) tennis courts, two (2) ice skating rinks, and two (2) additional swimming and recreational boating facilities each are needed across the community.

Transportation

Bike and Pedestrian Connections

The DEIR includes plans for a Suffolk Downs project area Bike Network, as well as five slides proposing potential bicycle connections to regional destinations including the Orient Heights and the Beachmont Square Business Districts, the East Boston Greenway, and Revere Beach. The Friends is very supportive of the East Boston Greenway extension. While the Friends Group is highly supportive of the concepts presented, we are concerned with the safety of use of the proposed advisory bike lane along Barnes Avenue and the at grade crossing of Saratoga Street north of Constitution Beach to connect the southern portions of the East Boston Greenway to points north (including Suffolk Downs). Orient Heights Square has a long history of motor

The Friends have provided feedback at Suffolk Downs planning meetings regarding these issues. Rather than use a bike advisory lane and at grade crossing, the Friends Group has been collaborating with the MBTA over the past year and a half, researching use of a MBTA rail right of way under Saratoga Street and into the Orient Heights Blue Line Station entrance area north of Saratoga Street as an alternative. The Friends alternative crossing option would safely connect the East Boston Greenway to points north and provide access to potential routes to the east to destinations in Winthrop. The MBTA has given the Friends initial, positive feedback about the feasibility of this Greenway alignment. The Friends request that the Proponent consider the benefits of the underpass right of way, as well as acknowledge the need to develop a Winthrop-bound Belle Isle Inlet branch of the Greenway, and indicate their interest in providing some level of support for this.



Through our Barr Foundation grant-funded placemaking work this summer, the Friends has explored the benefits of providing extended cycling services. While the Proponent has proposed a system of bike paths and bike racks, the DEIR does not specify the type of bike storage to be provided, or programming offered. Our research shows strong demand for covered commuter bike stations, as well as a slate of innovative cycling opportunities such as family survey bikes (four-person bikes), pump tracks, and programs for senior citizens, and persons with disabilities.

Given the need for ground transportation, a mode shift which meets the Proponent head-on on day one at this project, the Friends request that the Proponent make clear and concerted efforts to supply the forward-thinking cycling infrastructure needed to make this a cycle-priority zone. The Friends believe that the Proponent should also provide similar infrastructure upgrades within urban transportation catchment areas in surrounding towns.

MicroHUBS

The Friends join HYM in advocating for the City to install enhancements along neighborhood connectors to improve travel safety, accommodate biking, and make walking more comfortable, as well as to implement plans to develop Suffolk Downs and Orient Heights Stations as mobility microHUBs. The Friends Group also requests that the Proponent enhance their current proposal with specific plans for innovative ideas such as MicroHubs to help people on the project site as well as in other key local transit catchment areas connect between mass transit service, bike programs, and other beneficial ground transportation modes.

Car Traffic

The transportation analysis in the DEIR confirms significant existing regional congestion in the Route 1A corridor and continuing north on Route 60 through Revere to Route 1, as well as difficulties on Route 60 exacerbated by a lack of complete direct connections between Route 1 and Route 16 (Revere Beach Parkway). These conditions are projected to continue to deteriorate independent of the Master Plan Project in the absence of any specifically programmed and funded major transportation infrastructure improvements. Since no such improvements are currently programmed in the MassDOT's Transportation Improvement Plan (TIP) and the Master Plan Project will create significant additional traffic, the Friends Group believes the Proponent must make vastly expanded and innovative commitments to transit planning and implementation.

Improvements to local existing intersections to rationalize traffic operations, relieve congestion and reduce queuing on off-ramps, and the proposed superstreet redesign of route 1A will not reduce the traffic volumes, speeds, or congestion problems. It will increase them. With existing regional commuter and airport traffic impacts in East Boston's urban enclaves, already some of the metropolitan region's most severe, further growth in area trip generation is not sustainable. For example, considering current morning commuting traffic flow rates, the additional 4,939 (3,853 entering/**1,086 exiting**) Morning Peak Period vehicle trips the Master Plan Project is expected to generate during the weekday morning peak hour will add as much as 3 hours to the current 2 hour regional traffic jam- a result which will extend congestion shock waves throughout the North Shore.

Overall, the Friends Group is extremely concerned with the lack of detailed regional transportation planning provided in the DEIR. The Proponent has provided competing sets of projections for total daily trip generation, projecting the addition of as many as 122,000 average daily weekday trips without a providing corresponding the DEIR does not make the case that the Master Plan Project will have a strong enough transit plan to avoid .

Pedestrian crossings of Bennington Street and Route 1A at the entrance to the Belle Isle Marsh Reservation and Tomasello Drive respectively are excellent features of this proposal and will be of great benefit to community members throughout the region. But increased volumes and throughput spell disaster for pedestrians hoping to enjoy these features.

The Friends recognizes traffic speed and congestion as serious impediments to access to public open spaces and the healthful benefits they can bring. As such, we request that the Proponent add a series of additional regular Bus Shuttle Routes to downtown and other important

commuter destinations as a measure to increase HOV modes and improve connections to mass transit.

Loss of Local Mobility

Overall, the Friends Group supports efforts to reduce volumes of motorists, reduce vehicular speeds and calm traffic patterns. The DEIR proposes a number of measures to rationalize intersections which are designed to improve traffic conditions from trips originating from and heading to Suffolk Downs. However, while restricting local mobility at Boardman Street and Neptune Road may simplify these intersections and improve throughput in the north / south direction, these measures will add delay and vehicle miles traveled for movements in the east / west direction. Such delays could frustrate and complicate local mobility, with dangerous results.

Accelerated Open Space Connectivity

With vexing regional traffic challenges causing severe congestion at the project site already certain to be exacerbated by development, and; considering the proponent's non-motorized mode share goals, the Friends Group requests that the Final EIR include plans to implement the additional connectivity benefits prior to the proposed phased-in timelines. Multi-use paths leading to and from the project, between key transportation hubs, local residential and business districts, and bike share stations, secure bike storage facility infrastructure at major bus and train destinations would be a tremendous benefit of the development. This will establish early on that Suffolk Downs will not be another Seaport District debacle that was defined by its transportation planning failures, but instead by its strength of connectivity for walkers, bikers, transit users, and drivers.

Ecology

Land Use

While the Proponent will create a Central Common and other amenities which will combine to offer 40 acres of open space, and Chapter 91 requirements make private land public in meaningful and enforceable ways. With over 15 miles of coastline, East Boston residents are familiar with Chapter 91 processes, however with the Suffolk Downs parcel having been classified as a Landlocked Tidelands.

The Friends Group would like to see a comprehensive history of the regulatory status of the Suffolk Downs parcel included in the Final EIR to provide neighborhood stakeholders with a more complete understanding of the legal bases of their part in negotiations over the privatization of this intertidal zone.

Daylighting

The Suffolk Downs parcel has been shaped by water since the site is bordered by existing and buried creeks. Once the site of a Revolutionary War battle, and now on the forefront of our new fight against the impacts of climate change, the development's future will continue to revolve around water. With this, the Friends Group is pleased that the Proponent is proposing to

'daylight' portions of Sales Creek to improve ecological and flood storage functions. The Friends Group would respectfully ask that the Proponent prepare an alternative plan which includes analyses of the ecological and flood storage benefits of a full (or fuller) daylighting of Sales Creek. In addition to potential ecological and climate resilience benefits, the restoration of a continuous natural body of water at the project site would provide exponential recreational and aesthetic benefit, and offer a defining ecological narrative for the entire project.

Urban Forest Strategy

The Friends supports the Proponent's ideas on Urban Forestry. However, given the impacts of climate change and the need to mitigate stormwater and heat impacts of a changing climate, wherever possible the Friends would like to see the Proponent accelerate planting schedules. Also, it has been our goal to turn urban parks into 'learning landscapes.' With trees at the center of so much New England culture, and a potential educational and tourist attraction, Friends suggests that the Proponent consider adding interpretive and educational elements to its Urban Forestry Strategy.

The Retail / Jobs Environment

For the Friends Group, development, programming and stewardship of East Boston's open spaces has always been guided by our values of diversity. And we believe the success of the East Boston Greenway is enhanced by the presence of anchor destinations serving the full socio-economic and cultural spectrum of our diverse community. Without the East Boston Library, local schools, our thriving shopping districts, and a diversity of social, business and cultural assets, our parks and public realm would not be as vibrant.

We are encouraged that the Proponent has committed (at a recent public meeting) to dedicating 10% of it's retail spaces to small retail opportunities. Creating such small business opportunities will allow the TOD at Suffolk Downs not only to better serve its communities' residents with retail which suits its needs, it will also assist in development of unique neighborhood identities, and provide economic opportunity already needed in East Boston's urban enclaves.

The [2011 MIT Study, East Boston, A Place to Start, A Place to Stay](#) pointed to the strength of East Boston's cultural assets and the health of its retail environment, but warned of a critical shortage in available small retail space. In order for the urban neighborhoods and open spaces described in the DEIR to be as successful as those in our existing community a diversity of retail spaces, social, and cultural opportunities is essential. We ask that the Proponent offer a well-balanced environment through the addition of push cart vendors (as suggested in the MIT study), as well as additional creative retail opportunities such as [pop-up retail spaces](#) and innovative [incubator spaces](#).

The retail corridor concept along with the residential areas outlined in the DEIR suggest that there will be a sharply marked retail - residential delineation. The Friends encourages the Proponent to consider the density, frequency, and scale of urban retail found in highly successful urban retail environments such as Rome or Venice. As a community-based group of

East Boston residents, we believe that a diversity of retail spread *more evenly* across the planned neighborhoods at Suffolk Downs will encourage pedestrian trips within as well as beyond the project boundaries and emphasize the walkable urban nature of the to be built communities in important ways. In a 10 - 20 story neighborhood, residents should never be much more than a block or two away from the essential benefits and conveniences such as a breakfast joint, bakery, convenience store, bar or dry cleaner.

Conclusion

The Friends of the East Boston Greenway, as a community-based volunteer group, sees our urban parks and open spaces as essential to the health, wellbeing and quality of life of the residents of East Boston's family neighborhoods. What limited open spaces we have in East Boston serve multiple functions: acting as the lungs of our community, providing respite from daily stresses, offering places for reflection, connecting residents to jobs, shopping and recreation, standing against the impacts of climate change, relieving local vehicular congestion, and providing a safe mode of cross-community travel to name a few.

We are counting on the open spaces at Suffolk Downs to do the same: connecting the East Boston community to Winthrop and Revere communities via an explicit extension of the East Boston Greenway, alleviating the ever-worsening road traffic which is now reaching critical levels, increasing community coherence by encouraging walking and biking to transit, jobs, and for recreation, providing venues for learning, jobs and entertainment, and acting as a catalyst for diversity and equality by leading to new neighborhoods which offer housing, economic and social opportunities to all.

We expect the section of the East Boston Greenway going through Suffolk Downs to be treated as a high priority amenity. Would like to see the new Greenway section publicly accessible at all times, providing well appointed, well-lit, and comfortable amenities including adequate seating, trash receptacles, wayfinding and educational (including historical interpretive) signage.

Sincerely,

A handwritten signature in dark ink, appearing to read "Karen Maddalena", is written over a light yellow rectangular background.

Karen Maddalena
President
Friends of the East Boston Greenway

May 27th, 2019


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

Dear Mr. Czerwienski,

I am contacting you to express my support for the HYM plan to redevelop the Suffolk Downs site and I am looking forward to the day when construction begins so we can start to see the benefits this project will bring to the community.

I am impressed with HYM's transparency and I am confident that HYM will continue to stand behind its commitments as the project is constructed over the next 20 years.

Thank you,

A handwritten signature in black ink, appearing to read 'Mirna', with a stylized flourish at the end.

Mirna Orellana
New England Salvadoran-American Day Foundation Inc.
4 Neptune Road Suite 416
East Boston MA 02128
Tel [REDACTED]

Comment: Created Date	First Name	Last Name	Organization	Opinion	Comments
5/31/2019	Mary	Cole		Oppose	<p>I oppose approval of the Suffolk Downs development project as currently proposed. My main objections are: 1) the PDA is incomplete and misleading, 2) the project benefits from its location between two MBTA stations, yet there is little focus on providing support to improve MBTA Blue Line service, 3) the proposal only provides the bare minimum of affordable housing and uses regional rather than local metrics and 4) the proposal lacks provisions for civic infrastructure. To provide more detail: The documentation is incomplete. The PDA refers to agreements detailing public benefits and developer obligations (affordable housing, transportation, open space, and climate resiliency plans), but these agreements are not complete and have not been provided to the public. Approving the PDA without these documents would be equivalent to ?writing a blank check.? All supporting project agreements should be released in a substantially complete form together with the revised Draft Impact Report and PDA *BEFORE* this project is considered for approval. In addition, statistics presented by the developers are deceptive. To cite one example, the per-unit occupancy of 1.58 used is much lower than the current East Boston average of 2.6-2.8, and even lower than the per-unit occupancy in the Seaport. This creates concern that a low occupancy number was chosen to minimize projected public impact in areas such as transportation. The project is designed as ?transit-oriented development? and benefits from its location between two MBTA Blue-Line stations. However, the developers proposed mitigation plans do not provide enough support for Blue-Line improvements to offset the impact of this development. Instead, the developers focus on widening</p>

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					<p>Route 1A in the vicinity of the project and funding a private bus service. Widening Route 1A will not improve access to downtown Boston; the tunnels are the bottleneck. The focus needs to be on getting cars off the road by providing public transit that people use. The Blue-Line already operates at near full capacity during rush hour. Adding thousands of new commuters will make it difficult for residents to get on a train at the Airport and Maverick stations. Any acceptable development plan must adequately address the impact on the Blue-Line. The project should include substantially more affordable housing units than the 13% of total units currently proposed. The proposal needs to use a more accurate local measure of housing affordability; ?affordability? should be based on a weighted blend of citywide and East Boston household income. The proposed project would increase the population of East Boston by approximately 30%, yet there are no provisions for additional civic infrastructure, such as schools, hospital, police or fire department facilities. The developer should allocate land and funds to the City of Boston so that adequate services can be provided to this new development. In summary, the plan as presented is incomplete, misleading and does not address the impacts on the East Boston community. I strongly oppose its consideration until these issues are corrected.</p>

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5/31/2019	James	McBride		Neutral	<p>First the Planning document is very confusing and things seem to get lost in the pages or, not mentioned at all. Transportation- East Boston is currently gridlocked in the morning. What kinds of improvements to overall roads and especially the blue line is included (More trains, greater frequency) Folks at Maverick station currently sometimes have to wait for several trains to pass due to them being over crowded during rush hour. 10,000 additional units will surely have a negative impact on transportation. What is their Transportation Access Plan? 1.58 persons per household is too low an estimate. Currently East Boston has a 2.8 persons per dwelling. 2.8 should be the absolute minimum when doing transportation modeling. It should be higher to plan for the future. I hear there is a shuttle service plan but I do not see this in the plan. Housing- East Boston has a large minority, low income population. The affordability piece of the plan does not look specifically at the surrounding neighborhood income and I believe uses Boston as a whole. Many current residents of East Boston would not even be able to afford the affordable units in the plan. This is detrimental to the current lower income families in East Boston. I would like to see more affordable housing in the plan with more affordable prices. Not just the minimum. Once affordable housing units are determined I think they should not be available for amendments unless they increase. What are the exact number of affordable units as well as senior housing? Emergency Services- I do not see additional Police, EMS, fire services. I believe there should be a fire station, Ambulance bay, and Police station in the plan. I also believe there should be at least one if not more health centers.</p>
					<p>School - There should be at least 1 school on-site. Open Space- I believe there should be more open space and once finalized the should be deed restrictions on changing this. Climate change- Is the developer working with the state for barriers to combat climate change? Raising the property for their development as well as the surrounding communities. I would like to see increased the Mega watt of solar buildings beyond 2 MW. Thank you for taking my comments. Sincerely....James McBride</p>

Comment: Created Date	First Name	Last Name	Organization	Opinion	Comments
5/31/2019	patricia	feeley	Ms	Oppose	This is a massive project which presents an opportunity to address the critical need for more affordable housing in that area as well as more attention to efforts to zero carbon footprint, which is seems many Massachusetts government officials have supported . As a retired nurse who practiced in Massachusetts for over 40 years, I hold this opinion due to the many health and education issues I have seen and anticipate related to lack of decent,affordable housing for working families and retired people. Much of "senior" housing has a long waiting list for those of us with significantly reduced income. This opportunity for positive actions in both the area of affordability and climate issues should NOT be missed in a state as forward thinking as Massachusetts.
5/31/2019	Zack	Declerck		Support	Please do not let a NIMBY minority prevent or drastically slow this important development. Boston is in dire need of more housing to obsorb demand and stop displacement in established neighborhoods. This is a transit rich opportunity that should be truly mixed use and dense. If added density and smaller units can provide an opportunity for a higher percentage of income-restricted units let?s do that! Other ways to meet affordability dieresires without diminishing the amount of units is to limit parking for private vehicles. This is an opportunity to build something for the 21st century. Please don?t suburbanize it by favoring cars. Lastly, we need way more studios and one bredrooms in this city so young professionals don?t need to take up our triple-decker housing stock with roommates they don?t want. Micro-units can make something naturally more affordable. With gratitude, A young family in the city of Boston

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5/31/2019	Gloribell	Mota	Neighbors United for a Better	Oppose	<p>Dear Mr. Czerwienski, Neighbors United for a Better East Boston (NUBE), is writing to express our opposition and concerns regarding HYM Investment Group vision, process and transparency on the proposed Suffolk Downs Redevelopment project to transform a 161-acre site ?land into a highly-resilient, transit-oriented, mixed-use development with commercial office, retail, housing, and open space? that is going to have major impact to all our neighbors and City for generations to come. From our most recent experience in your last public hearing held on Tuesday, May 21st, the community process that HYM and Boston Planning & Development Agency (BPDA) has implemented illustrated the lack of commitment, respect, and limitation of HYM ?comprehensive neighborhood process? considering that the meeting had insufficient: - Language access and materials were highly inefficient and inaccessible considering that 68% of East Boston households speak a language other than English at home and 50% are foreign-born. Language access should be a must and fully integrated. - HYM defines its community outreach to be comprised of ?stakeholders? landowners, local businesses, municipal departments, state agencies, and elected officials but no mention of the 70% renters, 56% of households with children under 18 and immigrant families, youth and many others that voices deserve to be heard and that might not necessarily use the traditional affiliation to engage in City processes. We believe that if HYM Investment Group wants to be successful in creating this new community to co-exists with that are currently living here, it needs to be a good neighbor and create a multitude of processes that engages our diverse social-economic</p>

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					families in Eastie. It needs to expand its processes in an intentional manner, engaging communities that historically have been excluded in designing, planning and visioning of our neighborhood future and have just as much investment in the betterment of all. We are also concern of HYM, vision for the 161-acre site that aims to transform the 'land into a highly-resilient, transit-oriented, mixed-use development with commercial office, retail, housing, and open space.' Particularly since this vision aims to incorporate elements that we have seen emerged across the City of Boston, creating ?powerful new economic hub? that does not enhance the quality of life and economic opportunities of those that currently call that City home further contributing to Boston inequality gap. We need a strong binding agreement that secures the future of our neighborhood in all aspects socially, economically, civically and culturally. We can?t support Suffolk Down Redevelopment proposal in its current form and ask the City of Boston and BPDA to decline all permits and zoning discussion until HYM has engaged in an intentional and authentic public accountability process and provide a comprehensive and legal binding community benefits agreement that addresses: - Displacement mitigation planning that includes proposals that keep East Boston, Chelsea and Revere families in a safe and stable home. - How it will create a welcoming and accessible pathway that serves as an extension to the larger East Boston communities through our connection with our parks and open spaces. - Ensuring weather resistant green spaces like parks, bike lanes, and outdoor theaters are publicly visible and accessible for all neighborhood residents to use. - Housing affordability for the

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					<p>diverse neighborhood going beyond meeting the compliance affordable housing requirements of the Mayor of Boston's Inclusionary Development Policy, 50% affordability for 25% of Area Median Income and give application priority to current families at displacement risk. As well as support alternative housing models such as cooperative housing, etc. - From planning, initiation and sustaining the project it must provide employment opportunities and go beyond the City of Boston Ordinance 5-5.3 Boston Residents Job Policy to ensure employment opportunities to local residents and increase small business opportunities. - Commitment to ensuring that permanent economic opportunities pay the prevailing wages and that new permanent jobs on the Site and commercial space will be open for local small businesses and residents of East Boston to access as economic opportunities. The project must include financial resources for the surrounding community infrastructure and quality of life. - A community benefits package that prioritizes the highest public good, environmental justice and investments for the neighborhood directly impacted. We want our community to have a vibrant, active, diverse, and healthy economy that allows our families to prosper and have the best quality of life possible. However, the high cost of living, unstable and poor quality jobs, inequality, criminalization, discrimination and an environment that doesn't promote community integration and healthy coexistence threaten the economic prosperity of our families. We believe local economic and housing development should be done in a balanced approach that allows for a healthy coexistence for all that currently live here. Most importantly, we want the decision-</p>
					<p>making process is transparent, accountable and inclusive that includes those in the community that is most impacted. Thank you.</p>

Comment: Created Date	First Name	Last Name	Organization	Opinion	Comments
5/31/2019	Jackie	Goldbach		Oppose	<p>Dear Mayor Walsh and Tim O'Brien, I am both upset and disappointed to hear that Boston's largest development process is being rushed through with minimal input from residents and housing advocates. It's critical that this development is affordable. By affordable I mean 50% of units should be affordable at 25% area median income. When I say 'area' I do not mean Brookline, Cambridge, and Jamaica Plain. When I say area, I mean the neighborhood you plan to build in: East Boston. The current proposal accelerates gentrification without a meaningful anti-displacement plan. These roads and neighborhoods should not be privatized or built to serve those who are already upwardly mobile. The development should prioritize climate resiliency. The vague, non-committal references to transportation and green spaces are completely inadequate. Please slow down this process and work with The Boston People's Assembly. The ramifications of this development will be felt for generations to come. Respectfully, Jackie</p>
5/31/2019	KANNAN	THIRUVENGADAM	Eastie Farm Inc	Support	<p>Suffolk Downs and the Climate-displaced Sheltering the temporarily displaced and housing the permanently displaced The Suffolk Downs development, by virtue of being an island of resilience, can benefit two groups of people: 1. People in the North Suffolk region temporarily displaced by an emergency such as flooding. The development must offer shelter for such people. 2. People in the North Suffolk region who must permanently relocate due to worsening climate conditions. The development should commit to working with the city and town governments and the state government to provide safer housing options for such folks. Given that - 100-year (1%) storms are becoming more frequent (than 1%) - we have witnessed a few 500-year storms in the past decade, and - hurricanes are making it further and further north due to warming oceans during the 20 year development period at Suffolk Downs, East Boston and other coastal towns and neighborhoods around Suffolk Downs are likely to face some extreme weather events and consequences due to the globally destabilized and quickly deteriorating climate system. Some of these events may trigger minor emergencies, while others may precipitate long-lasting effects on people's lives: people may be displaced from their homes temporarily or permanently. Such displacement may be caused by flooding, or prohibitive flood insurance costs, or the fear of either, or other effects indirectly linked to risks posed by climate change. When folks are temporarily displaced by acute situations like flooding, Suffolk Downs can be a place that provides refuge and shelter as the situation warrants. To this end, HYM must build provisions that can serve as temporary</p>

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					<p>shelter for displaced communities. Given that - The National Flood Insurance Program is likely to reduce its subsidy (gradually, incrementally, or in leaps and bounds depending on policy changes, political and economic climate) - Nuisance flooding from king high tides and other regular phenomena will make flood zones undesirable thus driving down home values - Accelerating sea level rise will likely lead to increased flood zones requiring more and more folks to pay flood insurance - Partial solutions for storm surge (such as raising the water's edge) may likely have inadvertent effects such as trapped flood - Fear of flooding and flood insurance premium increase will likely drive home values down People will seek safer spaces to live (a permanent displacement caused by climate change). HYM must prioritize housing for local applicants who are thus displaced or at risk of such displacement. HYM may work with government agencies on planning for these services, but given the complexity of this issue, this cannot be left to government agencies to address solely on their own at their own pace. It is incumbent upon large developments (that are currently in plan and certain to happen, such as what HYM proposes for Suffolk Downs, which, by virtue of their consideration of 2070 1% flood levels, are likely to be islands of resilience) to go the additional distance to set up to accommodate those who are living in old housing stock in and near flood zones, referred to as oceans of vulnerability, via a relocation program to help them stay in the neighborhood. Note that even homes in higher elevations (like those in Orient Heights) are vulnerable to extreme weather as demonstrated by a mudslide in September 2017 caused by a</p>

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					<p>cloudburst. If it had any worse, this mudslide would have seriously impacted abutting foundations: https://eastbostongreenway.com/2018/09/09/i-hope-it-doesnt-stop-there/ Note also that even if people are not flooded, they may be cut off from water supply and heat. During Summer, people, especially elderly, are vulnerable to extreme heat and may be more susceptible due to social isolation. The final project plan must include 1. a comprehensive temporary shelter program that is developed in partnership with the city and the state, with details about pre-notification, designated location of the shelter, emergency transportation plan of people to the shelter, stocking of supplies including food, water, and medicine, etc. The shelter should be constructed and stocked during the early phases of the project. As we all can recall, during Katrina, it was the lack of preparation that led to the pathetic experience of communities completely unbecoming of a developed nation. 2. A plan to house people in the region at risk of permanent displacement--during the 20-year or so construction period at Suffolk Downs--at Suffolk Downs or elsewhere in the neighborhood, should they choose to stay in the neighborhood. (For instance, the plan may be to improve old housing stock in low risk parts of the neighborhood, while adding additional units. Clearly, any such solution will involve other parties, and there has to be a benefit to them for their involvement.) Without such a plan, the region risks losing people to other towns/cities (or even states) with lower climate risk, thereby also jeopardizing the economy of the region in the next 20 years.</p>
5/31/2019	Eastie	FARM	Eastie Farm Inc	Support	<p>We at Eastie Farm have found community food-growing spaces to serve as informal education spaces for eco-conscious lifestyles (composting, rainwater harvesting, etc.) and for learning about nutrition, cooking, and growing food. Besides all that, they are also great for building community cohesion. Also, given the number of people likely to live at the development at Suffolk Downs (upwards of 20,000), it is important to have a Zero Waste Plan and a Food positive plan from the get-go. The plan should include spaces for community farming including rooftop gardening, indoor gardening, and outdoor gardening towards growing edibles for local consumption. These spaces may include programming for students in the nearby schools. They must be economic stimulators for those who run them, and local, fresh, organic, food producers for the residents. They can further serve as carbon sequestration mechanisms, and rainwater utilization means (as plants need water to grow). In that sense, they will be effective climate mitigation spaces as well.</p>

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5/31/2019	Stefan	Doerre		Oppose	<p>I am commenting as a Boston resident that is concerned about the health and future of his children. The project as planned presents a considerable addition to Boston's greenhouse gas emissions inventory for decades to come and thus is a huge burden to the mayor's goal of being carbon neutral by 2050. Therefore, the project is not compatible with the City's stated climate goals. In fact, I consider it unconscionable to still construct buildings this way in 2019. Any fossil fuel infrastructure built today will continue to spit out CO2 for decades to come. On the other hand, as so many projects in the US and worldwide have shown, incorporating a net zero carbon goal into the planning of any project is at most marginally increasing the costs, if it is done right, as experts across the river in Cambridge can testify or as shown in the guidelines of Architecture 2030. Any developer, architect, or contractor that is not up to date with net zero construction guidelines and possibilities is causing harm not only to the community where a building is built but to the world at large. The City and in fact the world can't afford to permit developers to do business as usual if we want to maintain a chance to mitigate the worst effects of climate change. Arguments that buildings can be retrofit later are just kicking the can down the road. Numerous studies and pilot projects have shown that the costs of retrofits are a multiple of the costs of including net zero carbon planning from the get go. In addition, a non-net zero building would contribute CO2 emissions until the time it is retrofit. The City should not be swayed by such arguments. I therefore ask the BPDA to reject the project as currently proposed and ask the developer provide planning for a development that is net zero</p>
					carbon. Thank you!

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5/30/2019	Scot	Krueger	Scot Krueger	Oppose	<p>I strongly oppose the Suffolk Downs development project as it is currently proposed. My opposition falls into three main areas: 1) Excessive size for the surrounding neighborhoods, 2) deceptive and incomplete documentation of the proposal, and 3) a total lack of civic infrastructure and minimal mitigation of regional negative impacts. A brief summary of these elements follows: 1) The proposed development includes an extremely dense core of 175-220? towers which is equivalent to building a brand new downtown high-rise district in the middle of a neighborhood which is currently a mix of 3-4 story residential buildings and low-relief commercial space. This is massively out of proportion to the already overburdened infrastructure (roads, subway, schools, hospitals, police, fire, etc.) and will create serious negative impacts on the daily quality of life from Revere to East Boston with no offsetting mitigation or compensation. 2) The document is fatally incomplete, with many of the promised documents (affordable housing, transportation, open space and climate resiliency plans) only promised as ?to be delivered after approval?. This is tantamount to writing a blank check. We should not stand for this lack of completeness in the development plan. And the existing documentation is deceptive in its use of misleading statistics to support such a massive addition to the neighborhoods north of Boston. The numbers used for things like ?cars per housing unit? are well below city standards, being conveniently dismissed under the guise of being a public transit-oriented development, but local experience near subway stations suggest these numbers are woefully underestimating the need for parking. And the statistics</p>

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					<p>suggesting the MBTA Blue Line is adequate for the proposed development are completely bogus. Anyone who has ridden the Blue Line anywhere near peak rush knows the incredible crush of humanity that already taxes this system and the proposed development would dramatically increase ridership (or else push harried commuters into using cars). Without a reduction in scale to fit more realistic numbers, and dramatic improvements to the Blue Line and road/tunnel network in even the smaller case, the proposed development will lead to even greater congestion in a city already known for the worst traffic congestion in America. 3) Because this development is the equivalent of building an entire additional city within the existing city, there will be massive need for additional infrastructure to support all the proposed new residences and businesses. There is no provision for the building of, or even setting aside space for, such necessary infrastructure as schools, hospital, police or fire department. This needs to be corrected in the proposal before it should be considered for approval. In addition, the negative impacts on the surrounding communities are quite obvious in terms of increased car and truck traffic and subway ridership, never mind years of construction disruption. There is no clear plan for providing any remediation at an appropriate scale to the neighboring communities to compensate for the pain they will suffer as a result of this massive proposal. In summary, the plan for Suffolk Down redevelopment is too big, too incomplete, and does not address the impacts on the surrounding communities. I strongly oppose its consideration until these issues are corrected.</p>
5/30/2019	Wayne	Yeh		Oppose	<p>Current housing developments are luxury and high priced in East Boston. This is causing rents to rise throughout the community. More families and individuals are being displaced from East Boston because the average family can no longer afford to live there. One of the problems in Boston and Massachusetts is the definition of affordability and the amount of affordable units available. I support the Boston People's Assembly (a citywide gathering of residents creating a People's Plan for Boston) demands that all new development have at least 50% affordability for families. Suffolk Downs should have 50% affordability for families at 25% of Area Median Income and give application priority to current families at displacement risk. Ensure that weather-resistant green spaces like parks, bike lanes, and outdoor theaters are publicly visible and accessible for all neighborhood residents to use. Slow down this process and work with housing advocates and residents to address our concerns.</p>

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5/29/2019	Ben	Antenore		Oppose	I strongly oppose this project unless there is a plan to build this project with affordability and sustainability in mind. Considering the current environmental climate crisis we find ourselves and commitments made by the city of Boston, there is no excuse for this project to not be built on net zero carbon emission guidelines which would help meet the city's environmental goals and position Boston as a leader. Let's not add to Boston's carbon emissions but instead subtract with a genuinely sustainable development project which will put communities and their health first.
5/29/2019	Andee	Krasner	1974	Oppose	To Whom It May Concern: At the end of January, the City of Boston and Boston University released its report, Carbon Free Boston. The report provides a map for how Boston can become carbon free by 2050 and meet our interim 2030 goal of reducing our carbon emissions by 50% by 2030 from 2005 baseline. The report shows that over 70% of our emissions come from buildings and that we must move immediately to building net-zero carbon buildings, and retrofit over 80,000 buildings to meet our 2050 goals. Given the immediacy of climate change: the UN estimates we have 10-12 years to reduce our carbon emissions by 50% to stay within 1.5 degree of warming, we urge you to not contribute additional carbon to our community. Staying below 1.5 degrees of warming is an important goal for Boston whose real estate will be threatened by rising sea water and flooding, which will be incredibly costly if we don't focus on climate mitigation. We also know climate change is already impacting our children's health: our kids are already suffering more environmental-related asthma and allergies and more tick- and mosquito-borne diseases. In light of the climate crisis, we ask that you build a net-zero carbon buildings that will mitigate climate change and be resilient to more severe weather. We request that you build an all-electric building, use an all electric HVAC system using VRF Heat pumps, use Triple Glazed Windows, insulate, commit to purchase of RECs or Green Power for 100% of energy use, and install solar panels where appropriate. We think that it is important to develop net-zero carbon plans now rather than be forced to do expensive retrofits in the near future. We also think that having net-zero carbon buildings will be appreciated by
					renters and owners alike who will pay lower utility bills. We share your commitment to building a vibrant Boston, and we hope that you will utilize cutting-edge, 21st technology to build a net-zero carbon community that will contribute to a healthier and more resilient Boston. Sincerely, Andee Krasner Volunteer with Mothers Out Front

Comment: Created Date	First Name	Last Name	Organization	Opinion	Comments
5/29/2019	Nat	Taylor	Resident	Oppose	I reluctantly oppose this project which otherwise I enthusiastically support, because the plan will further burden the site's adjacent roadways that are already over capacity, and does not adequately fund mitigation for the transit system. If the project goes ahead as planned, then each phase should be required to include a new transportation study that reevaluates the conditions and ensures that adequate mitigation has been implemented before starting the next phase. I am thrilled about all of the open space and commitment to extend the Greenway to Revere Beach and Winthrop.
5/23/2019	Brad	Bolman	Harvard University	Oppose	I cannot support this project until there is an assurance that low-cost or free healthcare will be provided onsite for those who live here. I am also curious about a few other issues: Will there be a public park? Will there be a public school? Will there be public housing? Will they increase the affordable units to reflect the community? Will they lower the Average Means Income to what East Boston actually is?
5/22/2019	Emma	Soucy		Oppose	What are the plans to increase affordable housing to ensure that thousands of families are not displaced? A retail center of this size has been proven time and time again to displace existing populations, and many of the families who live in East Boston are immigrant families who are particularly vulnerable in today's political world. How are you going to protect them from the inevitable gentrification and displacement a project like this will condone? Are there any plans for public amenities and offerings, such as a library or health clinic or parks? "Publically accessible" space does not count as an actual public park as it is still monitored and enforced by private forces who will protect the interests of your hopeful "corporate" tenants above those of human beings who want to enjoy their neighborhood that you are planning to upheave. This massive undertaking seems wildly unjust and plays into the wants of wealthy businesses who want to come into Boston and amass more money to their fortunes, instead of protecting the neighborhood and livelihoods of the residents of Boston, which should be above and beyond the priority of the BPDA and Mayor Walsh.

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5/21/2019	Nicholas	Coccoma		Oppose	I find this proposal highly disturbing and a fundamentally misconceived use of what could be a transformative development. The creation of a privatized mini-city--a campus devoted to commerce and high-end living by the wealthy and privileged, with little to no public goods or service provided for the wider community of East Boston and Boston at large--is precisely the wrong kind of development for this city. Just a few of my questions: Where is a public park--not just a park accessible to the public, but an actual public park? Where is a public school? Will there be public housing? Will they increase the affordable units to reflect the community? Will they lower the Average Means Income to what East Boston actually is? Will there be more than 10% of the commercial space for local residents? What is the climate impact of this formally marsh land? What is the historical integration plan? I find it disturbing that at a time when Boston's public goods and services are in physical and financial ruin--especially our transportation system--that BPDA would allow this land and money to be used not to modernize the T or provide world-class public facilities and systems for East Boston but instead another gated playground for corporations and the rich. We could build an amazing system of public parks and schools in here, skating rinks and pools, libraries and farmers' markets--a utopia for children and many thousands of units of affordable housing. Does any of this plan arise from the actual needs, wants, input, desires of East Boston residents? Did they conceive this? Or was it cooked up by private developers to impose on the city? This development will radically alter the character of that neighborhood, irrevocably
					changing its quality of life. I see nothing in here that arises from the lived experience and local architecture, history, neighborhoods, and peoples of this part of Boston. Just looks like another Assembly Square, which is a bizarre, alien dystopia of outlet stores, malls, cineplexes, ugly parking lots and antiseptic condos. I strongly oppose this plan. BPDA should scrap it, and do what the City of Boulder, CO, did when developing its recent parks: hold a Citizens' Assembly of residents of East Boston--including children--and have THEM come up with what they want their own community to look like. Jane Jacobs would be appalled by this plan, and we should listen to her genius in planning Boston's future. https://www.ted.com/talks/mara_mintzer_how_kids_can_help_design_cities
5/21/2019	Stephen	Mahood		Neutral	We have a chance to build more public space and services that such as an outdoor pool that could be run by the Boston Center for Youth & Families. Has this been thought about or considered?

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5/21/2019	Zoe	Fahy	Boston Public Schools	Oppose	I am a Boston resident and 3rd grade teacher in the Boston Public Schools at the McKay in East Boston. Students cannot thrive in school without affordable, stable housing and strong public resources in their neighborhoods. I would like to know if there are plans for a public school or library on the development site. Have impact studies been done to see how many new students might come into the local East Boston schools or how it will affect development along the Blue Line? I look forward to learning more and discussing this issue further. Sincerely, Zoë
5/20/2019	Mike	Goodman	Democratic Socialists of America	Oppose	Giving this much land of this much value over to private interests is the wrong approach for this region. The plan as is does not provide enough public benefit or truly affordable housing.
5/18/2019	Thomas	Gordanier	Mr.	Oppose	I am deeply concerned about this huge space being developed as a privately owned fief with no public access, interest, or input besides what the owners decide to give us.
5/4/2019	Francia	Santos		Neutral	La comunidad de East Boston queremos mas departamentos en todo Boston y menos condominios para personas adineradas. Tambien queremos que no mas pongan negocios y no bicicletas que ponen en las calles porque no son tan necesarias. La ciudad necesita tener gimnacios gratis ya que todos son muy caros.
5/4/2019	Gladys	Perez		Oppose	Yo no estoy de acuerdo porque la gente no tiene suficiente dinero para pagar renta tan costosa, nosotros necesitamos bajo ingreso como el 30%. Ademas tantas personas van a traer contaminacion con ellos, al medio ambiente tantos carros y autos van a venir de Boston por el tunel y eso va a causar mas trafico.
5/4/2019	Nelson	Mejia		Oppose	Nuestros apartamentos deberian ser para personas de bajo ingreso y tambien para personas de edad.

Comment: Created Date	First Name	Last Name	Organization	Opinion	Comments
5/4/2019	Zahra	Halili		Oppose	<p>Although there is a 13% requirement of creating a housing development for " low-income" residents, that income is still high for our neighborhood and basing that income off the entire city of Boston rather than the East Boston neighborhood is not fair. The average income ranges from 40,000-50,000. The income you need in order to live in these complexes is 70,000. Residents here would not even be able to move into these apartments. While these complexes are being built, houses that are near by are going to face a increase in their rent. This does not seem fair at all. This is what we call gentrification. East Boston has yet to be invested in multiple services such as hospitals, pot-holes, lack of school funding, transportation. I am a East Boston High School student and because of gentrification, we are losing kids every year which then results in budget cuts. Our school is deeply saddened. These students are moving away for more affordable housing. This makes me question if schools would be around anymore in a couple of decades. These developments are slowly kicking us out. We have them built at the front of East Boston and now the end of East Boston which is Suffolk Downs. The rest of East Boston will live in the middle of all this gentrification.</p>
5/4/2019	Zahra	Halili		Oppose	<p>Although there is a 13% requirement of creating a housing development for " low-income" residents, that income is still high for our neighborhood and basing that income off the entire city of Boston rather than the East Boston neighborhood is not fair. The average income ranges from 40,000-50,000. The income you need in order to live in these complexes is 70,000. Residents here would not even be able to move into these apartments. While these complexes are being built, houses that are near by are going to face a increase in their rent. This does not seem fair at all. This is what we call gentrification. East Boston has yet to be invested in multiple services such as hospitals, pot-holes, lack of school funding, transportation. I am a East Boston High School student and because of gentrification, we are losing kids every year which then results in budget cuts. Our school is deeply saddened. These students are moving away for more affordable housing. This makes me question if schools would be around anymore in a couple of decades. These developments are slowly kicking us out. We have them built at the front of East Boston and now the end of East Boston which is Suffolk Downs. The rest of East Boston will live in the middle of all this gentrification.</p>

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5/4/2019	Yamina	Lachmi		Oppose	I've been a resident of East Boston for 18 years. After reviewing the plan, I have come up with a couple of comments about the planning and building of this infrastructure. I understand that the affordable units in this proposal would require an income of 70,000 and is based on Boston income where this will be built in the East Boston neighborhood where average income is between 40,000 and 51,000. About 10,000 units will be built keeping in mind we only have 1 high school, 1 middle school and a couple elementary schools in Eastie. All of these schools are really over crowded resulting in having to travel outside of East Boston to go to school. I also do not want my community to gentrify, these ideas seem like they are changing the fabric of my community and targeting a certain type of people to use the space. How will you guys make sure our communities stay diverse. The MBTA especially the 120 bus route from Maverick to Orient Heights is a hassle. Its on route every 30 min and is very unpredictable. We are living in a city it should not take 40 min to get to one destination where they are barely a mile apart. I come from a community where we are very active. One thing I very much think you should consider is a community center for the people. In our own community we teach kids about 21 century skills and very stem oriented.
5/4/2019	Ana	Gusman		Neutral	Necesitamos espacios abiertos ya que no hay suficientes. Abemas esta propuesta no es muy clara
5/4/2019	Christine	Jean		Oppose	Concerns in regards to housing is that we should be able to afford to live in East Boston, MA. Living in comfort and being able to do things for our community. The bike lanes are fine but before that we need to improve the environment if we were to add anything else. We need more green spaces around the city and parks for kids so they can be safe in the area.
4/30/2019	paul g	beaulieu	local 7 NEXT committee	Support	there was a discussion about using alternative building materials to be more cost effective. what kind of materials are we talking about and which trade will be awarded the work for erecting/installing these alternative materials?
4/22/2019	Joshua	Acevedo	Eagle Hill Civic Association	Support	I am in support of the redevelopment of Suffolk Downs. I have been to countless meetings both at Eagle Hill and the IAG meetings regarding this development. I own property along Waldemar, therefore am an abutter, where I intend to live in the near future. It would be wonderful to see new restaurants, retail stores, and job opportunities locate to that site.
4/22/2019	Christopher	Peabody	Peabody Office	Support	My family and I would love to have a friendly, safe, new space to enjoy close to home!

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4/12/2019	Erna	ChagnonSmith	individual	Neutral	.Build a viable communitydecent and TRULY affordable housing housing for working people who earn \$15 per ht. Low wage earners are shamed into silence, so have long been left out of this so-called housing "boom" & recovering economy. ?Who wants to stand up in a roomfull of neighbors & admit they toil for just \$15 an hour?! but plenty of us do.
4/12/2019	Philip	Muirhead		Oppose	Boston is in a housing crisis. We need affordable housing now more than ever. I want this development to have at least 20% affordable housing. The current proposal is 13%. I would like the developers to change the proposal to meet the 20% number and resubmit.
4/12/2019	Roberta	Marchis		Neutral	In reading the FAQ analysis by Lydia Edwards office, I learned that median rent and median family size (and income rates) differ significantly from the rest of Boston residents. I think HYM should adjust these issues in projecting affordable housing size and costs in rental units for the PDA. That is, some affordable apartments should cost less and these need to be more 3-bedroom units to include local family renters in the mix. I am very happy to see the inclusion of ao much green open space and HYM's Plans for the new development. I would like to see the provision of a large indoor communities performance center here. Alas, a commitment to flooding the outside amphitheatre - like space in winter for fun family ice skating. In summer, the area should be available for community exhibits and some performing arts program.
4/10/2019	Abigayle	Drew		Neutral	Hello - I would like to see the Suffolk Downs project include plans to make sure there is enough support for the Blue Line to have it run efficiently. I travel into downtown on the T from Maverick to State Street every week day between 8am - 9am. Often times trains come in to Maverick Station already full and no one can fit on until the next train. The following trains are typically 6 minutes apart which can be quite some time if you've already waited for the first train for 6 minutes. One morning this spring I stood there along with a crowd of people while 6 full trains came and went. I've seen people order taxis from inside the station and leave because the train is not reliable. East Boston already has a road traffic problem so I believe we want to make sure the train is reliable to keep usage high and off the roads. The Suffolk Downs development is only going to increase the need for the blue line. I am in hopes that there are plans to accommodate these high traffic hours and increase in usage. Thank you for your time!

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4/8/2019	Noemy	Rodriguez		Oppose	Como madre de familia quiero que sean mas justos y mas considerados ante toda esta sifocion. Si las rentas son restringidas y la confidad minima para codificar es \$48,000 que pasara con las personas que no tengan esa cantidad? Que va a pasar? Quiero Saber: Porque dice familias pequenas si soy madre de tres hijos. Va ver preferencia para las familias de East Boston? Puerder aumentar el porcentaje mas del13% para que tengamos reca oportunidad? Habron porques recretivos para las familias que habiten ahi? Queremos mas vivienda dignas y justas?
4/8/2019	Mireya	Gomez		Oppose	no deberian cambiar mi vecindario a un lujoso x que esto incrementa el valor de vida. Deberiamos mantener muerta comunidad diversa. It's only for rich people. No displacement. More transparent in the process. no increase rent now to then.
4/8/2019	Mike	Russo		Neutral	How do we prevent this from being just another South Boston waterfront?
4/8/2019	Gerardo	Chacón Hernandez		Oppose	Este proyecto nodeberia canibiar la felisidad delacomunidad el proyecto nolobeo mal pero lomal es la incomovidad de la comunidad. Por temor acer des plasados por este proyecto por tos enmentos derrenta kebendran. Ami meparece 120 piesdealtura esdemasiado para altura de esa altura ceria un riesgo demasiado alto deberia cer muchos altura. Mi pregunta es den la oportunidad de ketodoslosbancos puedan dar prestamos para personas keganen entre 52000 y 25000 queden prestamos para estas personas ke puedan conpras pooke muchas personas ganan esa cantidad y necefican y eso es como una descriminacion alas comunidad pobre eso ceria bueno kela ciudad pudiera ayudar a estas personas para poder conprar. Su propida casa kenosden oportunidades. Mi pregunta es kebana cer con la ceguridad comolaban al ministras vacer depate de la polisia o sikiures y con el transporte publico comobanacer an mentarmas de le ketenemos o basegir lo mismo anmentando mas xmas obana cer al goal respeto.
4/8/2019	Dan	Bailey		Oppose	Should be an extension of the surrounding East Boston Community in terms of composition and diversity. Anything less will create a new, economically and racially segregated enclave within East Boston. Accomplishing this goal will take bold, drastic measures well beyond the status quo to ensure that housing and retail space at Suffolk Downs is truly affordable to a full cross-section of the existing community in East Boston. What are the City's broad goals and vision for Suffolk Downs? What values are the City using to guide decision-making around development at Suffolk Downs?

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4/8/2019	Don	Nanstad		Oppose	1. "should" - City should adopt such a policy [potentially referring to Obama Fair Housing and his question]. 2. City of Boston should establish and maintain records, organized affordment of all "agreements" with Suffolk Downs 3. Suffolk Downs should accept a plan to provide housing commensurate with rates of tenants forced out by prices and condos in the past 4. Develop more "affordable" units in the development 5. Should include substantially more affordable units 2-3 bedrooms at substantially low income standard. 6. Should develop/accept plan with funding structured for substantial E.B. resident ownership at E.B. standard of affordability. (E.B. public foundation) . The Obama Extension of "Fair Housing" ...is that codified into requirements?
4/8/2019	Mary	Berminger		Neutral	1. IAG plans if we are keeping it as is, we have 5 years before East Boston starts 2. Codifying Public Benefits
4/8/2019	Ed	Coletta		Oppose	Should use affordability guidelines/criteria that tracks to the City of Boston and East Boston specifically and its data and not tie it to the data generated by the full Greater Boston area. Using the whole area will skew the data in a negative way for East Boston. 1. With the Belle Isle Creek cutting through the site connected to the Belle Isle Marsh and the ocean beyond, will the development plans take into account the wetland areas and plan for climate change and sea level rise? 2. Should market conditions, or a catastrophic situation, etc. impact the developer (HYM) and cause them to sell or move the rest of the project to another developer/entity, are there legal requirements written that bind the new entity to the agreed upon benefits and mitigation measures?
4/8/2019	Margaret	Farmer		Oppose	We should be allowed to negotiate mitigation up only. All roofs should be green roofs. At minimum put grass, letting dogs go up there. Proposed affordable units are miniscule- itself being a form of discrimination More variety in affordability levels. 5. Limit luxury housing the same way you limit affordable housing. Also, zone for occupancy, not investment. Plan a majority of affordable senior units to be larger than proposed. Do East Boston Residents get first chance to get affordable units? East Boston is a family oriented community, how does this plan meet the needs of families? More discussion of what a "private" development means- long term. During building I understand. But once building is complete - how do we ensure agreements for the community maintained? I had so many hopes for a "world class" community. Forward thinking and amazing. Although there are positive design elements, I am disappointed to see so many minimums. Minimum green space, minimum affordable housing. Minimum benefit to Everyone but the developers.

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4/8/2019	Sindy	Castillo		Oppose	Suffolk Downs should change the units that will be inclusionary since most of the people who live in East Boston are in low income. What priority will have residents of East Boston to buy house in this project?
4/8/2019	Alexandra	Zuluaga		Neutral	Will there be resource centers, family space/community space designated? Does community pressure have power to push developers closer to a realistic "persons per household" average, therefore pushing towards more appropriate square footage/unit layouts? Will there be units for extremely low income individuals (30% and AMI)? Will there be a lottery for admission to affordable units? How long will it be accepting applications, and what kind of preference will be afforded to East Boston residents?
4/8/2019	John	Walkey		Oppose	Cram it. IAG should be set for seen style. Deed restriction for Public Benefits. How are community benefits enforced? How does the community know about and track the delivery of these benefits? Can we break down for each phase the number of units (bedrooms, etc.) , average sq. footage of those and of those- how many are affordable? How many are ownership vs. rentals? Will there be a private security firm providing security? Confused by Public D.C. Area Standards "geographically conform to area"- what does that mean?
4/8/2019	Omar	Contreras		Support	Quiero que Suffolk Downs tenga vivienda para nuestra comunidad de Bejos Recurso Que puede vivir dignidad y respeto o que tengamos accesibilidad para comprar un condominio para que nuestra comunidad no se desplace por el suelo. Es importante que la renta sea accesible pero nuestra comunidad que hay que vivir de 3 cuartos para familias modestas. 4 el costo sea mínimo porque hay algo en Boston más que incrementar la renta pero no el alquiler por eso vemos desplazamiento en nuestros vecindarios. También es importante que la vivienda sea para todos que no vamos a desertar por el color o raza social. O por que no nos den documentos por lo cual hay muchos que aplazan esta ley y es lo que menos queremos. Es importante que veamos escuelas públicas centro comunitario para la comunidad y iglesia lo cual en este desarrollo no se ve eso? También es importante que la ciudad entera de Boston permita pero un desarrollo con esta multitud fuera bueno primero con su cultura con la comunidad?

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3/20/2019	Jordan	Zimmermann		Support	<p>Thank you for the opportunity to comment on your proposal and for the in-depth community meeting process. I am a resident of Orient Heights. I believe this development has the potential to positively impact the area but will require careful implementation of your proposal. See below my suggestions: 1. Investment in reliable transit options that are NOT cars. Bus and MBTA routes, in addition to the buses you will be adding for your residents, need to be improved and run on regular schedules 24/7. Car usage will be reduced as these alternate transit options improve. I understand that the Blue Line does not run at crush capacity as often as other lines, but the perception of public transit is as important as actual. If people are turned away from using the T, more cars and emissions are on the roads. The city should consider policies moving forward to reduce car usage - unpopular decisions that must be made to meet energy goals the City has set. 2. Implementation of your traffic and intersection improvements must be prioritized and part of early phases. This will improve traffic early, which will benefit East Boston and all those traveling through it. If residents see an improvement to traffic problems quickly, I expect you'll see more support and excitement associated as future phases move forward. 3. Strategic engagement of retail tenants to benefit the surrounding neighbors: affordable daycare, affordable but high quality grocery, affordable LOCAL restaurants, resources or activities for elders, office space that needs a variety of employee education levels. Emergency services and shelters should be provided. 4. I would like to see district energy planned for the site and passive solutions to reduce energy use for every parcel. Thank you.</p>
3/11/2019	Julia	Howington		Oppose	<p>In general, I am in support of the redevelopment of the Suffolk Downs site but this plan needs major reworking. This is a behemoth of a project in an already densely populated and traffic-choked area. To make this tenable the number of residential units needs to be downsized, traffic improvements to 1A and Waldemar Ave need to be underwritten by the developer, the amount of open space needs to be increased, and the developer needs to commit serious funding towards rebuilding Suffolk Downs and Beachmont Stations. To make matters worse, the City of Boston has been approving new projects in East Boston at an amazing pace - something has to give. The quality of life for residents in surrounding towns (Chelsea, Revere, Winthrop, and East Boston) are already diminished by the traffic and pollution from the developments that are currently under construction. The existing roads and public transportation just cannot absorb the additional traffic from all the uses stated in the proposal. As much as we'd like to hope that people will give up their cars, the current infrastructure doesn't make that a realistic goal.</p>

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3/6/2019	Mark	Stoltenberg	East Boston Resident	Neutral	I am a homeowner and community member in East Boston. My wife is a high school teacher in the neighborhood. This development is a wonderful opportunity to do something truly special. I want to be in support of this measure, but ask that the developers see this NOT just as an incredible opportunity to make lots of money, but as a chance to set an example of how leaders and communities can come together to build a brighter future. This is an opportunity to set a new standard for sustainable, environmentally friendly building--an opportunity to go beyond the "minimum necessary" for affordable units and middle income units, and instead strive to design a community that is designed from the ground up for economic, racial and cultural diversity as well as long-term sustainability. Look beyond the profits PLEASE and consider your legacy. Make this a project we can all be proud of.
3/5/2019	Scott	Kane	Park Place Condos	Support	On February 26th I attended the last public meeting for Suffolk downs but in the past I have been to several of these meetings. I'm a resident, and a board member, for Park Place Condos which are directly adjacent to the Suffolk Downs station on Leverett Ave. At this point in the process it seems like all the special interests have come out but I'm just a guy who lives here. In general I'm happy with what I see for plans there. I like the neighborhood layout for the most part and think this is a good use for the parcel of land. I've enjoyed living in this area for many years and I'm sure others will as well. That being said I fully recognize the people who eventually live in that housing will be a completely different population than has traditionally been in Revere & East Boston. That will all be luxury housing that won't be of a part of the rest of the neighborhood. They likely draw suburbanites in to the city or people with much better means than who would have previously considered this a place they want to live. Besides the social effects of the project my other main concern is having a sharp line between Boston & Revere. In the plans they've presented some buildings are located in both cities. I would strongly advocate for a clear boundary between the cities, perhaps in the form of a street or at least some landscaping. If the people are to join a community they should know which one they're in. For tax, emergency services, utilities, and plenty of other reasons it makes sense to keep the cities clearly delineated. From a historical perspective I think it would be nice if they could pay some tribute to the track in the neighborhood design. Perhaps in the form of letting part of a street be where the track was. That is not part of the current design and

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					<p>it's a shame. In 50 years it will come as a surprise to many people that there ever was a track there much like relatively few people today know Assembly square was a car assembly factory. I like the greenspace and parks have been taken in to account in the neighborhood plan. I don't believe the water mitigation is enough to protect the site against a major tidal surge but time will tell on that. Greenspace is what makes living here great. Currently Belle Isle Marsh is not really connected to this site but I'm hoping that will change. I'd like to see some sort of pedestrian bridge leading from the site to the main entrance of the park crossing at least the tracks but perhaps even Bennington street too. I personally like the bridge they did up at Wonderland along these lines. In a related note of green space- a very large wall covered with ivy or other plants would be a lovely way to try to hide the tanks. Despite the developer's optimistic thinking as long as there is an airport here those tanks are not going anywhere. Finally I'd like to comment on mitigation. It's frustrating to me that when their was talk of the casino at Suffolk downs all the mitigation money was targeted for parts of East Boston outside Orient Heights. There are projects here that are worthwhile and we deserve some of the mitigation money too. For example the old library has been vacant for years and our BCYF facility could get upgraded. I'd love to see more summer programming at Constitution beach like they have a Piers Park. The Marsh's benches are rotting out completely. The bike path could be extended up to the marsh from the beach now and perhaps even beyond. Local projects like this feed back in to the sight directly and just make sense to me. Thank you, Scott Kane</p>
2/21/2019	Dyan	DiMarzo		Oppose	<p>East Boston is already over flooded with new buildings, and plans to knock down old buildings and build more. These unaffordable units and/or properties are pushing out lifelong Eastie residents like myself. It's taking ?neighborhood? and ?community? away from us. It isn't fair. With that said, in the past few years with all the new traffic patterns East Boston still has a huge traffic issue, whether coming in or going out. This is all for people who see dollar signs. Sad that our community and neighborhood that I loved so dearly is being stripped away from one oversized building at a time.</p>
2/21/2019	Donna	Zozzi		Oppose	<p>We don't need any more residential buildings in an already over crowded neighborhood.</p>

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2/21/2019	Elena	Bertkau		Support	<p>Good evening, Thank you for making it possible to submit comments online. I think HYM is doing a wonderful job of vetting the project and taking community input into the plans. I'm writing to raise a concern about the impact this will have on East Boston now that progress that HYM is making towards starting work at Suffolk downs. Many drivers are already getting off of 1A to avoid traffic cutting through the Day Square area of East Boston to reach the Sumner and others are getting off Route 1 and coming through Chelsea through the Central Square area East Boston to go through the Sumner rather than the Tobin Bridge. Both of these scenarios are causing an unfair burden on the East Boston community, which has been magnified by the Tunnel entrance reconfiguration with the removal of the Toll Booths. During the latest presentation at the Eagle Hill Civic Association about Suffolk downs there were many intersections/transportation hubs included in their review, but it was quite noticeable that the Sumner tunnel entrance was not on this list. The proposal will exponentially increase the amount of people and cars traveling through East Boston along 1A and our local roads if the commuter rail, subway and blue line are not properly upgraded. I would like to implore the state investigate a few potential opportunities to get ahead of this transportation Crisis and create a commuter rail line that splits in Lynn and creates commuter rail transportation hubs in Revere and East Boston (neither of which are currently on the commuter rail System) which will create infrastructure to support the excessive growth in our neighborhoods, find a way to extend and increase weekday and weekend regularity in the blue to Lynn or beyond and establish and</p>
					<p>promote incentives for drivers to take public transportation into the city. As this development moves forward the city of Boston to install monitoring systems and review traffic incidents through Vision Zero in order to address problematic intersections and improve public transport(ferry/rail), pedestrian and bicycle commuting options(bridge/tunnel) in order to access other areas of Boston. Thank you in advance for your work to address this concern in the final development of Suffolk downs. Regards Elena</p>
2/20/2019	Jocelyn	Gould		Neutral	<p>1. Great care must be taken to ensure that the marsh is not polluted during this project. Snowy owls and other birds are there and it is the last remaining marsh of its type in the area. 2. There needs to be a street light (on demand maybe?) for those exiting out of the Suffolk Downs area onto 1a by the projects. The traffic is going to be even worse otherwise. 3. There needs to be another light leaving from the Stop and Shop to get onto furlong drive. 4. A high percentage of these housing units should be designated for families and lower-middle income people. 5. PARKING PARKING PARKING!</p>

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2/20/2019	Shelda	Powe	Resident	Oppose	I feel this will cause more extreme traffic going in and out and around east boston. This Will also take away more parking for residents and employees of east boston . I feel this will cause more issues of being overly populated which east boston already is!
2/20/2019	Kathleen	Lynch		Oppose	How are all of these people going to get around? We really don?t have the infrastructure for that much more traffic.
2/20/2019	Kathleen	Lynch		Oppose	How are all of these people going to get around? We really don?t have the infrastructure for that much more traffic.
2/20/2019	Jeff	Dearman	Mr	Support	Is there any way you could fit a New New England Revolution Stadium into the mix? It would be a perfect location in soccer hotbed neighborhood of East Boston, and other soccer fans minutes away by the Blue line - in Revere, Lynn, chelsea... etc. (Silver line to Blue line) etc. or a 5 -10 min car ride to the stadium) it would benefit the Revolution by bringing in revenue and people would spend \$\$\$ on game days and such. It would also attract people to a Patriot place mall like development with retail space and condos / hotels around the stadium and easy access to restaurants and retail space via the 2 blue line stations and many bus routes. It would be a win win for all of us. Also I feel that connectivity for the transit and open space needs to be key to this. More multi use walking paths connecting the East Boston greenway and other parts of the area and a walking network around/through the property would be good assets to invest in. Planting more flowering trees and bushes gardens through the property and maybe even a pond or two for recreational use as part of the development and maybe a recreational community center would be good as well with a swimming complex/ice skating facility etc. It could end up being like Assembly row but more GREEN and/with the benefit of having entertainment and sports in the revolution and concerts that could be hosted at the stadium and bring people to come to the complex
2/14/2019	Edmund	Colson	resident	Oppose	A detailed traffic study does not appear to be available on the BPDA site but the planning documents indicate the plan to mitigate increased traffic flow on Rte 1A will be via super lanes and more traffic signals. "Implement Transit Signal Priority at signalized locations where traffic mitigation is proposed as part of the Master Project. " Seriously? This is the plan? More traffic signals? The existing traffic signal at Boardman St. requires a State Police Officer to override the timing at rush hour. The solution is to send everyone who wants to cross Rte 1A down to the next intersection and stack them up there? These intersections obviously need a flyover. Transit Signal Priority is just another word for kick the ball down the road.

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2/13/2019	Nikala	Pieroni		Neutral	The most important need in Boston for any new construction should be a sizable amount of affordable housing! Cities do not become vibrant by only being accessible to it's richest members. Cities become vibrant, thriving spaces through diversity of all kinds. This is becoming increasingly impossible in Boston, and especially in East Boston, a historically working-class neighborhood. While I see some great things in this development, and look forward to the exciting new retail and living opportunities it will provide, if the affordable units in this development are not more than the minimum requirement, you will be doing a great disservice to this community that only helps a few.
2/13/2019	Sarah	Saydun	ZUMIX	Oppose	The long-time members of the East Boston community are afraid that their livelihoods are at stake because of the impact of this project. People are already losing their homes because of lack of affordability. Families are being displaced. High schoolers that I work with are being forced to leave their schools because their parents can no longer afford to live in Boston at all. East Boston has been home to these families for generations. They deserve to stay. Where is the plan to prevent families from being displaced? This project must include more plans for keeping East Boston affordable -- more affordable units for low-income families, more commitment to local business.
2/13/2019	Corey	DePina	ZUMIX	Neutral	This plan needs more affordable housing units. affordable housing for artists would be amazing This plan needs to incorporate partnerships with local non profits and community programs to finds ways to work together to support a healthy community
2/12/2019	Carlos	Brown	East Boston Schools Family Coalition	Neutral	Dear Planning Members and Stakeholders: I am writing as a concerned parent and advocate for Boston Public Schools. I hope that the members will seriously consider in becoming a part of the BuildBPS initiative and allocate space for at least one new building to serve our students in East Boston. Our buildings, on average are over 90 years old. We are going to add a brand new neighborhood to East Boston. One that we hope is welcoming to all the families and demographics currently in East Boston, and we want to make sure that there is space for our neighborhood schools to improve. I ask that you please strongly consider reserving space for academics, athletics, and common community spaces to support the East Boston community. Thank you for your time. Regards, Carlos-Luis Brown East Boston Schools Family Coalition Co-chair of Curtis Guild Elementary School Parent Council and School Site Council

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2/12/2019	Gail	Miller	Friends of Belle Isle Marsh	Support	At the next meeting I think it is time for folks to see the model created for this project. It is always difficult to envision a entire project in the abstract. Residents have been asking for this for quite some time.
2/10/2019	Gloribel	Rivas		Oppose	In order for this plan to gain my approval, it would need to include a robust percentage of truly affordable housing (more than 13%) and it would need to be explicit and intentional about the metrics it will use to determine what affordable means. It is disappointing that after so many meetings and so much input requesting a greater share of truly affordable housing, the Master Plan for this project only includes only the requisite percentage of total affordable units. East Boston and Revere have seen a massive influx of speculation in real estate that has led to the clear and documented displacement of many individuals and families, especially those with low-income, particularly by flippers. When it comes to affordable housing, this Master Plan shows a lack of commitment to the communities around the proposed development by doing only what is required by law. Also, there is no explicit intent to make 'affordable housing' truly affordable for the neighborhood in which it will be built. If this project is only including the requisite percentage of housing units, one can surmise that it will use conventional AMI metrics to determine what affordable means. Currently, the BPDA determines affordable housing as housing for people earning between 70 or 80-100% AMI. The American Community Survey (cited by the BPDA here: http://www.bostonplans.org/getattachment/55f2d86f-eccf-4f68-8d8d-c631feb0161) shows that between 2012 and 2016, East Bostonians earned a median of \$52,733.00 per year; that is only slightly above 50% AMI. Unless the developers of this project include an explicit mission to make affordable housing for those earning between 30 - 50% AMI, the housing will not actually be
					affordable for most people in the neighborhood. If developers will only do what the BPDA and the City of Boston mandate by law or regulation and no more, then the BPDA should modify metrics for affordable housing according to neighborhood needs. Otherwise, it is massively failing current residents.

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2/8/2019	Joel	Wool	Office of Lydia Edwards	Neutral	<p>February 8th, 2019 Dear Mr. Czerwienski: Thank you for your stewardship of the Planned Development Area review for Suffolk Downs. On behalf of Boston City Councilor Lydia Edwards, who represents District One, including the East Boston portions of Suffolk Downs that comprise the Planned Development Area, I am submitting the following questions into the record. The questions have also been provided to the proponent, The HYM Investment Group, LLC. We look forward to working with all stakeholders in reviewing the proposal and in securing the best results for East Boston and the City as a whole. Regards, Joel Wool Director of Policy and Communications Office of Councilor Lydia Edwards Suffolk Downs -</p> <p>Initial Set of Questions Housing Please clarify the estimated units of housing produced in each phase, beginning with Phase One. Please clarify the estimated units of housing, per building type (e.g. townhomes, apartment building, mixed-use, single family home). Housing / Inclusionary Development: Please identify the number of inclusionary development units estimated per phase. Beginning with Phase I, please clarify if the project proponent intends to meet inclusionary development policy (IDP) goals with on-site, off-site or payout, a combination of all three, or if this has not been determined. If meeting IDP goals with off-site compliance, does the proponent intend to direct off-site units to East Boston? What is the estimated Residential Gross Floor Area per IDP unit? As necessary, please clarify distinctions per building model or type. What is the estimated cost per IDP unit? What is the anticipated incremental cost of adding an inclusionary development unit on site? What is the anticipated incremental cost</p>

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					<p>of adding an inclusionary development unit off site? Please estimate the share of IDP units by affordability level, e.g. one-half of units at 70% AMI, 50% AMI, etc. Please clarify breakdown of IDP rental vs. homeownership units. Housing / Senior Housing Page 9 of the PDA submission indicates at least 10% of residential space, including accessory units, will be senior housing, and that 13% of senior housing units will be IDP/affordable units. Please clarify the number of units that will be senior housing units. Please clarify the proposed level of affordability for senior housing units built in compliance with the IDP. Please clarify the number of senior units proposed in each phase of construction, beginning with Phase One. Public Benefit / Phase I Please provide, and submit into the record, a description of the mitigation that will be provided with respect to each building in in Phase I, in accordance with the mitigation schedule in Exhibit F, ?Summary of Public Benefits and Project-Related Mitigation Measures?. Public Benefit / Tax Revenue Please provide a rough estimate tax revenue to the City of Boston for Phase I buildings, as proposed. Please provide a rough estimate of tax revenue to the City of Boston for all buildings, assuming project completion as proposed. Public Benefit / Infrastructure Expenditures The proponent identifies \$170 million in public infrastructure and open space investments on Page 11 and elsewhere in the PDA filing, including Exhibit J. Please clarify Exhibit J and other description of public investment by identifying, valuing and itemizing: ? The infrastructure and open space investments at Suffolk Downs ? Other investments in East Boston, if any ? Proposed regular maintenance of infrastructure or open space</p>

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					<p>which would otherwise be borne by City of Boston, and estimated annual cost ? Infrastructure investments elsewhere in Boston ? Investments not in the City of Boston ? Proposed investment to expand the inbound capacity of Route 1A Please expand on any regarding the possible inclusion of a municipal building such as a school or fire station at the site (in addition to the 2,500 sq feet of ground floor community/civic space currently identified for temporary location in Belle Isle Square during Phase 1B).</p> <p>Public Benefit / Open Space Exhibit J shows the Central Common as being part of Phases 2B and 2R, while Exhibit H shows it as part of Phase 1B. Please clarify which phase of the project the Central Common will be a part of and what (if any) open space will be included in Phase 1B besides Belle Isle Square. Please consider the addition a designated soccer area (fields with goals) to both Exhibit F and Page 3, Section 5, Subsection C.</p> <p>Sustainability / Building Emissions Building emissions are the greatest source of pollution in the City of Boston. In the DEIR/DPIR filing, the project proponent identified building emissions of roughly 72,554 - 90,230 tons. The MA Department of Public Utilities has since approved an energy efficiency plan indicating some support for Passive House construction/design. The PDA filing also implies a greater commitment toward Passive House Development / Energy Positive buildings but does not detail building emissions. Please clarify if the overall proposed energy usage / building emissions have changed since the DEIR/DPIR filing. Please describe how passive house development does or does not account for any change. Please clarify sustainability measures proposed for larger buildings</p>
					or commercial spaces. Please provide the LEED checklists for each building in Phase I, or clarify when they will be available.
2/7/2019	matthew	emond	n/a	Support	<p>It seems there is no connection between the new development and Bennington Street around the entrance to Belle Isle Marsh Park. That is a very beautiful and popular spot, and it would be great to walk directly from the new neighborhood to this park via a new light and crosswalk on Bennington.</p>