

BOSTON PLANNING & DEVELOPMENT AGENCY

**REQUEST FOR
SUFFOLK DOWNS REDEVELOPMENT PROJECT**

**SUBMISSION REQUIREMENTS
FOR ADDITIONAL INFORMATION REQUEST**

PROPOSED PROJECT: SUFFOLK DOWNS

PROJECT SITE: 525 MCCLELLAN HIGHWAY
EAST BOSTON, MA 02128

PROPONENT: THE MCCLELLAN HIGHWAY DEVELOPMENT COMPANY, LLC
AN AFFILIATE OF THE HYM INVESTMENT GROUP, LLC

DATE: AUGUST 22, 2019

The Boston Redevelopment Authority (“BRA”) d/b/a The Boston Planning & Development Agency (“BPDA”) has issued this Request for Additional Information in response to content presented by the McClellan Highway Development Company, LLC (the “Proponent”) in both the Draft Suffolk Downs PDA Master Plan document filed on February 13, 2019 and the Supplemental Information document filed on May 01, 2019.

This document was prepared in collaboration with other public agencies and is focused on the critical issues of urban design, affordable housing and transportation. This document includes comments and feedback on these topics and others - contributed by public agencies, elected officials, and members of the public - and anticipates the submission of a revised Draft Suffolk Downs PDA Master Plan. When the Proponent files a response to this request, the BPDA will initiate a public review process. Further, all public comments are included on the BPDA website project page for reference.

I. PROJECT DESCRIPTION

The Proposed Project entails approximately 10.5 million square feet of development on the approximately 109 acres of the Suffolk Downs site in the City of Boston. The multi-phased proposal will include the development of a new mixed-use neighborhood, a 40-acre publicly accessible open space system, and two retail squares at the Suffolk Downs and Beachmont MBTA Stations. The initial project phase will include approximately 1.39 million square feet of development consisting of the Phase 1 Project (520,000 square feet of corporate use and amenity space), three residential buildings, a portion of the townhomes proposed along Waldemar Avenue totaling over 800 housing units and construction of the Horseshoe Pond landscaped wetland enhancements and Belle Isle Square public plaza with over 100,000 square feet of ground floor retail.

II. PREAMBLE

The Proposed Project is being reviewed pursuant to Article 80 of the Boston Zoning Code (the “Code”), Development Review and Approval, which sets forth a comprehensive procedure for

project review of the following components: transportation, environmental protection, urban design, historic resources, infrastructure systems, site plan, tidelands, and Development Impact Project, if any. The Proponent is required to prepare and submit to the BPDA a Request for Additional Information Filing that meets the requirements of this request by detailing the Proposed Project's impacts and proposed measures to mitigate, limit or minimize such impacts. After submitting the Additional Information Filing, the Proponent shall publish notice of such submittal. Public comments, including the comments of public agencies, shall be transmitted in writing to the BPDA after the public notice has been published. If the BPDA determines that the Additional Information Filing adequately describes the Proposed Project's impacts and, if appropriate, proposed measures to mitigate, limit or minimize such impacts, the Preliminary Adequacy Determination will announce such a determination and that the requirements of further review are waived pursuant to Section 80B-5.4(c) (iv) of the Code. Section 80B-6 of the Code requires the Director of the BPDA to issue a Certification of Compliance indicating the successful completion of the Article 80 development review requirements before the Commissioner of Inspectional Services can issue any building permit for the Proposed Project.

The Project Notification Form ("PNF") was filed with the BPDA on November 30, 2017. This filing kicked off the formal BPDA review and community process. After the initial phase of review and community process was completed, the BPDA issued a Scoping Determination to the Proponent on February 21, 2018. The scoping determination sought further analyses and studies by the Proponent, in addition to responses to all comment letters received. The Proponent subsequently responded with a Draft Project Impact Report ("DPIR") to the BPDA on October 1, 2018. The filing of the DPIR kicked off the second phase of review and community process. The BPDA determined that even further analysis was needed and required the Proponent to file an initial Supplemental Information filing along with the Draft PDA filing. Notice of the receipt was then received by the BPDA of the Draft PDA and Supplemental Information was published in the Boston Herald on February 13, 2019, which initiated a public comment period that ended on May 31, 2019. The BPDA hosted publicly advertised community meetings regarding the Draft PDA and Supplemental Information Filing on February 26, 2019, March 7, 2019 (in Spanish Language) and May 21, 2019. In addition, IAG meetings were also held on April 10, 2019 and April 30, 2019.

III. STAFF COMMENTS

Structure of the PDA Master Plan document

In accordance with Article 80C of the Code, a PDA Master Plan may be submitted setting forth a statement of the development concept, including the planning objectives and character of the development, the proposed uses of the area, and the range of dimensional requirements contemplated for each of the proposed uses. The document should avoid referencing previous filings or documents required by other agencies, and should include all reference material in the appendix of the PDA Master Plan.

To clearly communicate the planning objectives and character of the development, the Suffolk Downs PDA Master Plan must demonstrate a development framework derived by locating all features of the public realm including public rights-of-way and open space, and subsequent parcelization plan. Within this framework, the Suffolk Downs PDA Master Plan must clearly identify the ownership strategies and intended construction phasing for all features of the public realm. The PDA Master Plan must also identify zoning subdistricts, which lay out the proposed uses and range of dimensional requirements anticipated for resultant development parcels.

Public rights-of-way, including roads, alleys, and multi-use paths such as bike and pedestrian paths, must be laid out and recorded by demonstrating the centerline of the right-of-way and its intended dimension. Public rights-of-way must be classified using nomenclature from Boston Complete Streets guidelines. It is expected that the City of Boston would retain an easement over those rights-of-way that connect to existing public rights-of-way such as McClellan Highway and Walley Street, as well as any right-of-way expected to host public services such as utilities and transit. Further guidance related to features of the public realm is included below and will be submitted in comment letters from appropriate agencies.

To clearly communicate the strategies associated with impact mitigation, the Suffolk Downs PDA Master Plan must outline strategies for assessing potential impacts, methods for deriving appropriately scaled mitigation for those impacts, how the mitigation will be allocated across specific intended outcomes, and the expected triggers associated with the distribution of mitigation measures. Mitigation must be associated with intended project performance. Project performance will be measured by specific metrics to be recorded in the PDA Master Plan. Should the project be unable to achieve specific outcomes as recorded in the PDA Master Plan, it is expected that associated project mitigation will be reassessed. Triggers for the distribution of mitigation must be tied to project thresholds to be recorded in the PDA Master Plan and may include but are not limited to total gross square footage delivered, number of project occupants including residents and employees, transportation mode share and project phase.

Planning and Urban Design

To entitle both Article 80B and Article 80C Approval of the project, the BPDA requires that several features of the Suffolk Downs PDA Master Plan be encoded in the zoning approval.

Requirements for zoning subdistricts governing public realm, including open space and civic space, must include features such as general character, typical uses, and general dimensions related to size and location. The Suffolk Downs PDA Master Plan must identify intended ownership strategies for all open spaces, and that at minimum, 2.5 acres of recreational open space would be controlled by the City of Boston, once complete. It is expected that the 12 acres of open space identified as the Central Common would be permanently protected via a conservation restriction to be recorded with a shared use agreement allowing public permitting of a recreational use. A more detailed memo from BPDA and Boston Parks Department staff is included as an attachment to this request.

Requirements for zoning subdistricts governing development parcels may include features such as proposed uses and building design standards. Design standards may include several dimensional requirements such as lot coverage, maximum building height, maximum length of building face, building setbacks, podium heights, podium step backs, tower height, distance between towers, maximum floor plate area, and gross floor area per dwelling unit. Other building standards beyond dimensional requirements may include a minimum percentage of ground-floor active uses, maximum combined width of all vehicular entrances, restrictions on location of loading and service areas, restrictions on location of parking entrances, and parking requirements.

Housing Affordability

While a developer's requirements under the Inclusionary Development Policy ("IDP") on one-phase projects, whether small or large, are generally well understood (though still open to increases as part of the Article 80 review process), given the scale and character of the

Proposed Project it is important that there is a commitment to additional affordability at this site. The following are areas where the BPDA and the Proponent have already agreed on some specific goals and outcomes, and the Proponent's response should outline their agreement with these goals as well as any additional and/or more specific efforts the Proponent will undertake to create additional affordability on-site or within East Boston.

- The Proponent has agreed to provide the on-site rental units at an *average* of 70% of Area Median Income ("AMI"), instead of all units at 70% of AMI. The maximum AMI of any individual unit would be no more than 80% of AMI. This change from what is typical practice under the IDP is allowed in this area of the City, and will assure that a broader range of incomes can be served and can access housing at Suffolk Downs.
- Under the IDP, the focus has been on providing a set percentage of the total units on-site, and that these units are to be comparable in type and size to the market rate units. As a result, a significant percentage of units created under IDP are studios and one-bedroom units. To increase the provision of two- and three-bedroom units suitable for families, BPDA staff are willing to recommend to the BPDA Board that the Proponent be allowed to provide a set percentage of the total residential square footage rather than a set percentage of the total units, in order to provide these larger units.
- The Proponent has agreed to create a neighborhood stabilization fund early in the development process to assist East Boston nonprofits to purchase and then income restrict existing housing. This fund would address ongoing displacement pressures in the neighborhood now, and would be similar to the City's Acquisition Opportunity Program. The Proponent should provide more detailed information about the amount, timing and implementation of this new program.
- As a mixed-use development, significant linkage funds will flow to the Neighborhood Housing Trust. These funds are then dispersed citywide. The developer can, however, take the "Housing Creation" option, accelerating payments to the fund to support individual projects. The Proponent should discuss making commitments to using the Housing Creation option to 1) increase affordability within Suffolk Downs, and 2) supporting affordable housing developments within East Boston.

Transportation and Mobility

The Proponent should work to continue the ongoing dialogue with City and State agencies, elected officials and the East Boston community to resolve outstanding transportation and mobility issues identified through the Article 80 process. A more detailed memo from BPDA and Boston Transportation Department staff is included as an attachment to this request, but a high level summary includes the following:

- The Proponent should submit additional information regarding the rationale of sitewide street layouts and dimensions, a comprehensive bicycle network plan, curb uses and management, and loading. This should include methodology for deriving trip volume estimates and how these relate to parcel level, or district level, planned buildout. This analysis should also include a traffic demand management plan with the intent of reducing vehicular demand while optimizing alternate modes of mobility.
- The Proponent should make clear statements regarding a sitewide parking strategy and commitments to monitor parking needs/demand over the build-out of the Project with the goal of further reducing the number of parking spaces in future construction phases, as warranted. The distinct phases at which this analysis and determination takes place should be made explicit.

- The Proponent has identified an approximately \$50M program of off-site transportation, transit facilities and related infrastructure improvements. As a result of ongoing conversations between MassDOT and the City, the list of transportation related mitigation improvements has changed substantially. This full modified list of mitigation measures should be updated and identified within the PDA documents.
- The Climate Ready Boston Coastal Resilience Solutions program will be conducting further analysis of East Boston with a focus on the Belle Isle Marsh and Chelsea Creek areas in 2020. This will provide a greater understanding of vulnerabilities to current and future coastal storm events and sea level rise, as well as the types of coastal interventions and design options to protect landside areas. The Proponent should provide substantial resources to further advance the design plans and options that result from this process, including previous commitments to refine and expand a resiliency assessment of regional barrier along Bennington Street and Route 1A with the potential to protect the project site and abutting properties.
- The Proponent has previously committed to a publicly accessible shuttle connecting the project site to South Station and the South Boston Waterfront. This commitment should be further detailed in the supplemental filing and memorialized in the PDA Master Plan. This should include a specific timeline tied to development milestones that will trigger implementation of this service.
- The Proponent should commit to design and fully fund the implementation of an East Boston Greenway extension from Constitution Beach to the Suffolk Downs site via Bennington and Walley Streets. This connection will be critical for allowing cyclists from the East Boston community to reach the Suffolk Downs site safely and efficiently.

MEMORANDUM

TO: Michael Sinatra, Project Manager

FROM: BPDA /BTD Transportation Planning Staff

DATE: August 22, 2019

SUBJECT: Suffolk Downs Request for Supplemental Information Comments

This memorandum includes transportation related comments on a) the Draft PDA Master Plan documents and b) the May 1, 2019 Supplemental Information Document.

Draft Master Plan PDA Documents

Rationale for Internal Street Dimensions and Sections: The Proponent must submit additional supporting information demonstrating the quantitative methodology underlying the internal street dimensions, including all vehicular, bus, bicycle, parking/loading/pick-up, and turn lanes. For example, do you have estimated trip volumes for each street? It would also be helpful to understand the methodology for deriving trip volume estimates and how these relate to parcel level, or district level, planned buildout.

Curbside Uses: We would like to see a diagram showing the location of anticipated curbside uses across the site, including parking, loading, pick-up/drop off, and any other anticipated curbside uses. The diagram should be accompanied by a tally of curbside spaces for parking, loading, pick-up/drop off, etc.

Layout of Streets: As indicated above, all roads should be laid out, with metes and bounds of all rights-of-way. As per direction from the Public Works Department, certain streets will need to be designated as public. These should include any future rights of way which would accommodate bus, shuttle or emergency vehicle access. Preliminarily, we believe these would include:

- Tomasello Drive from connection at Route 1A
- Park Drive from connection with Tomasello Drive
- Main Street from connection with Park Drive

- Connection to Walley Street

Transportation Mitigation: In numerous locations, the draft PDA documents refer to mitigation measures identified in the DPIR. As a result of changes to the transportation modeling as requested by MassDOT as well as significant changes to required mitigation, many of the mitigation measures identified in the DPIR are now obsolete; referring to these mitigation measures no longer makes sense. Moreover, new mitigation measures will be forthcoming in the FEIR. It would be helpful to have a consolidated list of mitigation measures.

Trigger(s) for additional mitigation: At the end of the final paragraph in Section 8 of the Draft Master Plan PDA, it is stated that, “If the amount of traffic generated by the Master Project shall at any time exceed the amount of traffic projected in the DPIR to occur *upon full buildout [emphasis added]*, the Proponent shall work with the City of Boston to implement additional traffic demand management efforts to reduce the amount of traffic to the projected level.” This language is problematic because it only refers to the amount of traffic associated with *full buildout*. Any trigger thresholds for additional mitigation should be tied to specific *project phases*, as opposed to full buildout. We would be happy to discuss with you what the appropriate phases and trigger thresholds should be.

Parking and Loading: Section 9 of the Draft Master Plan PDA document states that there may be up to 7,216 parking spaces in the development. There needs to be a clear statement to reflect our understanding (made explicit in the May 1, 2019 Supplemental Information Document) that the Proponent will monitor parking needs/demand over the build-out of the Project with the goal of reducing further the number of parking spaces in future construction phases, as warranted. The distinct phases at which this analysis and determination takes place should be made explicit.

Public Benefits: The transportation-related public benefits alluded to in Section 11, paragraphs “i” and “j” of the Draft Master Plan PDA are extremely vague. There needs to be more detail about the public benefits (such as bicycle paths, bike parking, public bikeshare stations, etc.) including the location, characteristics, and scale or dimension. We would be happy to discuss this with you.

\$50M Mitigation Fee: Section 11(k) refers to an approximately \$50M program of off-site transportation improvements, transit facilities and related infrastructure. As a result of recent conversations between the Proponent,

MassDOT and the City, the list of transportation related mitigation improvements has changed substantially. This full modified list of mitigation measures should be identified in the PDA documents. Where fees may be paid in lieu of improvements, the PDA documents should stipulate that, over time, the fees will be indexed to inflation.

Boston Smart Utilities: The request to obtain the layout, dimensions, and characterizations of the streets above will be crucial to the successful implementation of the Smart Utilities program on this site, as explained in the sections below.

District Energy Microgrids: After an extensive process to review the District Energy Microgrid Feasibility Assessment, the Smart Utilities team and the Proponent have agreed to integrate into the project “District Energy Microgrid-Ready” design to the maximum extent possible, both at the development area level and the building level. The Proponent has agreed to continue defining with the Smart Utilities team the details. Although the focus is currently placed on Phase 1, our expectation is to a) re-visit the Feasibility Assessment analysis into subsequent phases of development and b) at a minimum integrate similar “District Energy Microgrid-Ready” design into subsequent phases of development.

Telecommunications Utilidor: The Proponent has agreed to lay out a Telecommunications Utilidor in the site. We will continue to define the details of location, design, and capacity of the Telecommunications Utilidor in coordination with PIC and the Proponent as more information about the layout, dimensions, and characterizations of the streets are provided by the Proponent. (Another important reason why we need the layout, dimensions, and characterizations of the streets).

Green Infrastructure: Currently, there is a question as to whether the Proponent will be subject to the 1.25” stormwater water mitigation requirement due to their proposed stormwater management program. The Proponent has been receptive to scheduling the appropriate meetings with the BPDA and BWSC to continue the conversation. If it is determined that the Proponent should adhere with the requirement, the Smart Utilities team will review this in coordination with Urban Design and BWSC as each building goes through the final design review and before obtaining a building permit.

Adaptive Signal Technology (AST): We will continue to define the details of the location and design of the AST in coordination with BTB and the Proponent as more information about the layout, dimensions, and characterizations of the Streets are provided by the Proponent. (Another important reason why we need the layout, dimensions, and characterizations of the streets).

Smart Street Lights: We will continue to define the details the Smart Street Lights design in coordination with PIC and the Proponent as more information about the layout, dimensions, and characterizations of the streets are provided by the Proponent. (Another important reason why we need the layout, dimensions, and characterizations of the streets).

Smart Utility Standards: The Proponent has agreed to integrate the Smart Utility Standards into the street designs. The design of the cross sections will vary depending on the size and characterization of street. The laterals showing how utilities will be pulled into each building from the right of way will vary depending on the street layout. We will request cross sections and laterals in coordination with PIC as more information about the layout, dimensions, and characterizations of the streets are provided by the Proponent. (Another important reason why we need the layout, dimensions, and characterizations of the streets).

Emergency Services Access: Emergency services are critical for maintaining life safety and responding to events. It is unclear how the street system time has taken into account access for emergency services (police, fire, ambulance, etc.). A diagram explaining routing for all emergency services, the implications such routing has on street design, and the source or basis for the planned routing should be provided. This diagram should assume direct access from Walley Street to the Suffolk Downs site which allows for two-way travel for emergency vehicles to access and exit the site; direct access from Walley Street will be critical for fire, police, and EMT services to access the Suffolk Downs site from existing locations in East Boston.

Maintenance: Proper procedures for roadway maintenance, including snow plowing, should be outlined by the Proponent. The Proponent include information on locations for onsite maintenance facilities and how maintenance agreements will be structured if multiple owners are present at this site in the future.

May 1, 2019 Supplemental Information Document

The following comments stem from the May 1, 2019 Public Information Document (SID) prepared by the Proponent.

Sea Level Rise: The SID states that the Proponent “continues to refine and expand a resiliency assessment of regional barrier along Bennington Street and Route 1A”. More specifically, there is reference to possible barriers along Route 1A and Bennington Street to protect the project site and abutting properties, including Suffolk Downs station and portions of the tracks. What is the status of this feasibility assessment? Is the Proponent planning to implement any related improvements as part of the project?

The Climate Ready Boston Coastal Resilience Solutions program will be conducting further analysis of East Boston with a focus on the Belle Isle Marsh and Chelsea Creek areas in 2020. This will provide a greater understanding of vulnerabilities to current and future coastal storm events and sea level rise, as well as the types of coastal interventions and design options to protect landside areas. The Proponent should provide substantial resources to further advance the design plans and options that result from this process. Each phase of the development program must also adequately address City resiliency policies, programs and standards that are current at the time of design development. Buildings on the project site must be responsive to the BPDA’s Sea Level Rise Design Flood Elevation. The Proponent should provide ongoing resources to support the maintenance and operations of the Department of Conservation and Recreation’s tide gate facility on Bennington Street.

Suffolk Downs Station: The SID states that the Proponent has completed an existing conditions and code assessment of both Suffolk Downs and Beachmont Stations and has submitted these to the MBTA for further review. Are these available for City/BPDA review? Will the Proponent plan to fund or make any improvements related these assessments?

Publicly accessible Shuttle to Suffolk Downs Station & Seaport: A direct connection from Suffolk Downs to the Seaport and South Station area will be critical to allow for a one seat ride to these growing job centers. The SID states that the Proponent has committed to a publicly accessible shuttle connecting the project site to South Station and the Seaport, and that the Proponent will coordinate with the City to refine the proposed shuttle services details as they are planned and implemented. Will the Proponent be committing to this shuttle as part of the PDA

Master Plan? A full plan concept plan should be developed with specific timelines and development phases that will trigger implementation of this service.

Bike Lane Design: The City is committed to implementing a network of separated cycle tracks to meet the mode share goals of Go Boston 2030. These connections will allow riders of all ages to use these facilities comfortably and with a high degree of safety. The SID states that there will be separated bike lanes on Main Street Corridor, and that otherwise they will follow MassDOT's Separated bike lane Planning and Design Guide which says that bike lanes are not needed on streets with speeds below 25 mph. A fully separated network of bike lanes, however, is critical for the City to meet the mode share goals of Go Boston 2030 and therefore should be located in more locations in the Suffolk Downs development. Close coordination with the City/BPDA will be critical to ensure this network meets standards set by the City of Boston.

East Boston Greenway Connection: The Proponent should commit to design and fully fund the implementation of an East Boston Greenway extension from Constitution Beach to the Suffolk Downs site via Bennington and Walley Streets. This connection will be critical for allowing cyclists from the East Boston community to reach the Suffolk Downs site safely and efficiently.

BOSTON

Martin J. Walsh, Mayor

May 31, 2019

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

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

Dear Ms. Polhemus:

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

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

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

Development Program

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

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

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



Boston Parks and Recreation Department

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

Open Space Framework

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

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

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

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

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

Needs Analysis

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

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

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

Open space amenities beyond those listed should also be part of the facility planning, but generally demand a smaller footprint and thus are easier to integrate into the open space system further into the design process (i.e. community gardens, dog parks, fitness stations etc.).

Passive parks, recreational trails, and civic spaces should also be part of the planning process to create a varied and cohesive open space system. With a 40 acre open space system, a fully developed recreation program can be accommodated within this new neighborhood.

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

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

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

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

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

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

Active Recreational Uses

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

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

Protection in Perpetuity

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

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

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

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

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

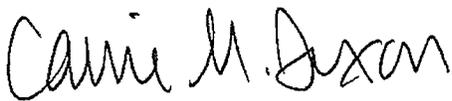
Phasing of Open Space

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

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

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

Sincerely



Carrie Marsh Dixon, Executive Secretary
Boston Parks and Recreation Commission

CC: Christopher Cook, Commissioner, BPRD
Liza Meyer, Chief Landscape Architect, BPRD
Jon Greeley, Director of Development Review, BPDA
Tim Czerwienski, Project Manager, BPDA