THE HYM INVESTMENT GROUP LLC

SUFFOLK DOWNS REDEVELOPMENT

Supplemental Information Document

MAY 1, 2019

PREPARED BY

vhb

SUBMITTED TO

Boston Planning &
Development Agency

PROPONENT

The McClellan Highway
Development Company, LLC
c/o The HYM Investment Group, LLC
One Congress Street, 11th floor
Boston, MA 02114

IN ASSOCIATION WITH

DLA Piper
CBT Architects
Beals and Thomas, Inc.
Stoss Landscape Urbanism
ARUP
AKF
SourceOne
Vertex
Haley & Aldrich

THE
HYM
INVESTMENT GROUP, LLC

May 1, 2019

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

Re: **Suffolk Downs Redevelopment Project**
Boston, MA

Dear Director Golden:

The McClellan Highway Development Company, LLC ("MHDC", or the "Proponent"), an affiliate of The HYM Investment Group, LLC ("HYM"), is pleased to submit the enclosed Supplemental Information Document ("SID") to the Boston Planning & Development Agency ("BPDA") for the construction of the Suffolk Downs Redevelopment Project (the "Master Plan Project") located at 525 McClellan Highway in East Boston (the "Project Site"). This SID is being submitted pursuant to Article 80 of the Boston Zoning Code (the "Code") in response to your Request for Supplemental Information ("RSI") issued on February 12, 2019 on the Draft Project Impact Report, which was filed with the BPDA on October 1, 2018.

The Master Plan Project involves redevelopment of the Project Site, which consists of an approximately 161-acre underutilized thoroughbred horse racing facility located within East Boston and Revere, Massachusetts. Approximately 109 acres of the Project Site is in East Boston, and approximately 52 acres is in Revere. Overall, the Master Plan Project consists of approximately 10.52 million square feet ("MSF") of development in Boston and approximately 5.68 MSF in Revere, within many buildings to be constructed individually or in development phases over a 15- to 20-year period. The Boston portion of the Project Site is in the Suffolk Downs Economic Development Area of the East Boston Neighborhood District, which is governed by Article 53 of the Code. The Code identifies the Suffolk Downs Economic Development Area as a Special Study Overlay Area and establishes the Boston portion of the Project Site as a potential location for a Planned Development Area ("PDA").

On February 1, 2019, the Proponent submitted an application for designation of a Planned Development Area ("PDA") pursuant to Articles 3-1A and 80C of the Code for development of the Project within the Boston portion of the Project Site (the "PDA Area"). The Proponent also requested approval by the BPDA of a PDA Master Plan and of five PDA Development Plans for Phases 1 through 5 (collectively the "PDA Documents"). Although the Code only requires a 45-day public comment period for PDA applications, the Proponent has agreed, at the request of the BPDA and elected officials, to extend the public comment period on the PDA Documents until May 31, 2019, a comment period that was twice extended for a total of 119 days.

THE HYM INVESTMENT GROUP, LLC

The Code does not specify a required public comment period for supplemental information documents, but the Proponent will publish public notice of submission of the SID and will provide for a 30-day public comment period, so that all agency and public comments are due to the BPDA by May 31st, aligning with the extended PDA Documents public review. Requests for copies of the SID should be directed to Lauren DeVoe at 617-607-0091 or via e-mail at ldevoe@vhb.com.

We look forward to working with you and your staff in your continuing review of this transformational Master Plan Project.

Sincerely,

Thomas N. O'Brien
The McClellan Highway Development Company, LLC
c/o The HYM Investment Group, LLC

Suffolk Downs Redevelopment

Boston, Massachusetts

SUBMITTED TO **Boston Redevelopment Authority, d/b/a Boston Planning and Development Agency**
One City Hall Square, 9th Floor
Boston, MA 02201

PROPONENT **The McClellan Highway Development Company, LLC**
c/o The HYM Investment Group, LLC
One Congress Street, 11th floor
Boston, MA 02114

PREPARED BY **VHB**
99 High Street, 10th Floor
Boston, MA 02110

In association with:

DLA Piper
CBT Architects
Beals and Thomas, Inc.
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May 1, 2019

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1

Project Overview and Supplemental Information

In accordance with Article 80B of the City of Boston Zoning Code (the "Code"), The McClellan Highway Development Company, LLC ("MHDC", or the "Proponent"), an affiliate of The HYM Investment Group, LLC ("HYM"), respectfully submits this Supplemental Information Document ("SID") to the Boston Planning and Development Agency ("BPDA"), in response to the BPDA's Request for Supplemental Information ("RSI") dated February 12, 2019 on the Draft Project Impact Report ("DPIR") filed October 1, 2018, for the construction of a new transit-oriented mixed-use community (the "Master Plan Project", or "Project") at the former Suffolk Downs horse racing facility set within the neighborhood of East Boston and the City of Revere, Massachusetts (the "Project Site"). This SID is in response to the requirements and comments outlined in BPDA's RSI (a copy of which is provided in Chapter 2, *Response to DPIR Comments*, along with direct responses to city department and public comments).

On February 1, 2019, the Proponent submitted an application for designation of a Planned Development Area ("PDA") pursuant to Articles 3-1A and 80C of the Code for development of the Project within the Boston portion of the Project Site (the "PDA Area"). The Proponent also requested approval by the BPDA of the PDA Master Plan ("Master Plan") and PDA Development Plans for Phases 1 through 5 ("Development Plans" and together with the Master Plan, collectively, the "PDA Documents"). The PDA Documents were submitted in both English and Spanish and are subject to an ongoing public review process. Approval would also authorize the Director of the BPDA to petition the Boston Zoning Commission to approve the PDA Documents. The draft PDA Documents are accessible via the web links provided in Appendix A.

This chapter provides an overview of the proposed redevelopment, project review history and status, and updated list of project permits and approvals. It also describes the existing site conditions and the key elements of the Master Plan Project.

1.1 Project Overview

Strategically located within the urban fabric of East Boston and Revere, the approximately 161-acre former Suffolk Downs thoroughbred horse racing facility owned by the Proponent is a unique opportunity for a new transit-oriented mixed-use neighborhood with the unique ability to produce approximately 10,000 units of new housing. Refer to Figure 1.1 for a site locus map and Figure 1.2 for the project context.

Overall, the Master Plan Project consists of approximately 10.52 million square feet ("MSF") of development in Boston (which equates to an approximately 2.22 floor area ratio, or "FAR") and approximately 5.68 MSF in Revere set (which equates to an approximately 2.48 FAR), all within many buildings to be constructed individually or in development phases over a 15- to 20-year period. Section 1.2.1 below for additional details on the proposed program.

The proposed conceptual redevelopment plan, or Master Plan Project, involves redevelopment of the Project Site, which is comprised of approximately 109 acres in East Boston and approximately 52 acres in Revere. Existing facilities at the Project Site include the clubhouse, grandstand, thoroughbred horse racing track (the "race track") with infield, a vacant administration building, maintenance buildings, horse barns (many of which are dilapidated and in danger of falling) and extensive surface parking areas. Figure 1.3 presents the existing conditions site plan and Figures 1.4 through 1.6 include existing site conditions photographs, respectively.

The Boston portion of the Project Site is in the Suffolk Downs Economic Development Area ("EDA") of the East Boston Neighborhood District, which is governed by Article 53 of the Boston Code. The Boston Code identifies the Suffolk Downs EDA as a Special Study Overlay Area and establishes the Boston portion of the Project Site as a potential location for a PDA. The Project Site was also identified as one of the future growth areas for Boston in the *Imagine Boston 2030*[1] city-wide plan and has long been thought of as a key area for economic development by the City of Revere. A zoning amendment approved by the Revere City Council and signed by the Mayor of Revere on March 27, 2018 created an overlay district to facilitate the development of a mixed-use community within the Revere portion of the Project Site.

1.1.1 Key Master Plan Project Benefits

Redevelopment of the Boston portion of the Project Site provides a unique opportunity to create additional housing, spur economic development, and improve connections between several adjoining neighborhoods. MHDC proposes that the Master Plan Project include various improvements and benefits for the area and City of Boston, as follows:

- Development of a new neighborhood with an active, lively and appropriate mix of uses (including residential, retail, office, lab, hotel and other uses), connected and supported by new open space, neighborhood retail and civic spaces;
- In furtherance of the Mayor's *Imagine Boston 2030* plan and to also meet the needs of surrounding neighborhoods, incorporation of approximately 7,000 housing units within Boston (and an additional approximately 3,000 in Revere), including townhomes, apartments, condominiums, on-site affordable units and senior housing;
- The Proponent intends to set aside 13 percent of the total number of housing units within Boston as affordable units under the Mayor's Inclusionary

1 http://imagine.boston.gov/

Development Policy housing program under the Mayor's Order Relative of Inclusionary Development dated December 9, 2015 ("IDP");

- Investment of over $80 million into a 40-acre site-wide publicly-accessible open space system, which will include two large plazas located adjacent to both the Suffolk Downs MBTA Blue Line Station in East Boston and Beachmont MBTA Blue Line Station in Revere, a public outdoor theater, various active and passive recreation areas, and existing wetland features;
- Investment of over $190 million into on-site infrastructure, including roadways, sidewalks, cycle tracks, smart utilities and water and sewer infrastructure across the entire 161-acre Project Site;
- Investment of over $50 million in off-site traffic mitigation measures to support major improvements to key regional and local routes and intersections, including the full reconstruction and signalization of Route 1A from Boardman Street to Winthrop Avenue;
- Incorporation of approximately 450,000 square feet of street-front retail which will be anchored at the new Belle Isle Square adjacent to the Suffolk Downs MBTA Blue Line Station and connected to the proposed Main Street Retail Corridor;
- Allocation of 10 percent of the retail space to local businesses and owners with flexible lease parameters;
- Incorporation of indoor civic uses/space, which has now increased to 50,000 square feet across the Project Site, which will allow for the potential inclusion of civic uses such as community center, neighborhood health center, common worship space, daycare, early childhood education, library branch and other potential civic uses;
- Construction of new commercial office and lab space attractive to employers of growing industries, which will enhance and expand job creation and economic opportunity;
- Application of transit-oriented-development principles through integration of the two existing adjacent MBTA Blue Line Stations and alternative travel modes, including new bicycle path connections and Bluebike public bike share stations;
- Development of improved connections to adjacent neighborhoods of East Boston, including Orient Heights, by incorporating new open space and pedestrian and bicycle pathways;
- Adherence to the BPDA's climate change policy with the incorporation of forward-thinking resiliency strategies intended to address future sea level rise and other impacts of climate change;
- Creation of significant annual property tax revenue for the City of Boston; and
- Over the term of the Master Plan Project's development, creation of approximately 14,000 new construction jobs and between 25,000 to 30,000 new permanent jobs.

1.2 Project Changes Since the DEIR/DPIR Filing

The following subsections summarize certain key changes to the Master Plan Project since the DEIR/DPIR filing. Certain changes are also discussed below in the response to comments section of this SID. Figures 1.7 and 1.8 present the previously proposed site plan from the DEIR/DPIR and the current refined site plan, respectively.

1.2.1 Development Program Changes

The Proponent has modified the development program to shift some commercial uses to residential uses (also known as "Program B"). Following conversations with the City of Boston, the Master Plan Project now proposes Program B as the baseline scenario resulting in a higher number of residential units (resulting in more housing and more affordable units within Boston) and a reduced amount of overall commercial space. Refer to Table 1-1 below for the currently proposed development program compared to the program with more commercial space which was presented and studied in previous filings (referred to as "Program A").

Table 1-1 Master Plan Project Updated Development Program

Use/Element	Program A (DEIR/DPIR)	Program B	Change
Commercial Office/Lab	Up to 8.0 MSF	Up to 5.2 MSF	-2.8 MSF
Residential[1]	7.15 MSF ±7,200 units	10.15 MSF ±10,000 units	+3.0 MSF +2,800 units
Retail	500,000 SF	450,000 SF	-50,000 SF
Hotel	550,000 SF ±918 rooms	400,000 SF ±785 rooms	-150,000 SF -133 rooms
Total GSF[2]	**16,200,000**	**16,200,000**	**-0-**
Parking Spaces	±15,250	±13,800[3]	-1,450

GSF Gross Square Feet, as defined in the applicable zoning codes.

1 Consists of housing units of various size and type, including home ownership, senior housing, and affordable units (in compliance with Boston's IDP and in coordination with the City of Boston).

2 Represents a not-to-exceed/maximum build-out; to be developed in multiple buildings each of which can be developed together or independently of the others and in differing sequences. Depending on market conditions or other factors, floor area may be reallocated among different uses, while remaining consistent with the overall proposed mix of uses, site-wide improvements and mitigation commitments to be established through the MEPA, Boston Article 80, and Revere zoning review processes. The flexibility of sequencing is critical to the Master Plan Project's ability to respond to market conditions.

3 Parking to be provided on multiple parcels the majority of which will be provided in structured garages with a limited allocation of on-street parking to support street-front retail uses.

Given the scale of the Project Site, the Master Plan Project is a long-term development that will be implemented in phases over a period of 15-20 years. Refer to Figure 1.9 for the currently contemplated phasing plan. The Master Plan Project is, therefore, being conceived with an overall development program that provides a degree of flexibility to balance different residential and commercial uses as development proceeds. (The reallocation from commercial to residential uses would occur in Boston as the amount of residential space in Revere is capped under the approved overlay district.)

Table 1-2 below breaks out the proposed development program by city.

Table 1-2 Master Plan Project Updated Development Program by City

Use/Element	Boston	Revere
Commercial Office/Lab	Up to 2.74 MSF	Up to 2.46 MSF
Residential[1]	7.31 MSF ±7,167 units	2.84 MSF ±2,898 units
Retail	200,000 SF	250,000 SF
Hotel	270,000 SF	130,000 SF
Total GSF[2]	**10.52 MSF**	**5.68 MSF**
Parking Spaces	±7,200	±6,600[3]

1.2.2 Site Plan and Building Massing Changes

The following summarizes certain key changes to the site plan and building massing of the Master Plan Project since the DEIR/DPIR filing, in response to agency review comments and community feedback. These project changes have been incorporated into the PDA Documents, where applicable.

Based on community and BPDA feedback, specifically, the Proponent and design team have continued to focus on the southernmost border of the Project Site adjacent to the Orient Heights neighborhood resulting in significant design changes in the Waldemar Avenue edge, as follows:

- **Reduced Height Zones -** Following community conversations, the Proponent has updated the plan proposal with lower 40-, 70- and 85-foot height limit zones along the Orient heights neighborhood and pushed back the taller buildings further away from the neighborhood. Refer to Figures 1.10a and 1.10b for the updated height zone plan and a comparison of the changes, respectively.
- **Refined the Waldemar Avenue edge -** The blocks between Orient Heights and the Parkway are further broken down into two rows instead of just one row creating diversity in building height and typology with addition of the mid-level building scale between the townhomes and larger multi-family homes. These changes are illustrated in Figures 1.11a and 1.11b for the updated block morphology plan and a comparison of the changes, respectively.
- **Completion of Waldemar Avenue -** The east end of the southern boundary is approximately at the north edge of the Waldemar right-of-way. The Master Plan Project has been modified to contain a row of single-family homes along this edge, completing the neighborhood context. The Project then has mid-rise buildings and higher buildings located further from the neighborhood.
- **Modified Tertiary Street between Waldemar Avenue and the Parkway -** The breaking of blocks described above also results in addition of a new access street, which creates a finer grained urban fabric. This change is illustrated in Figures 1.12a and 1.12b for the updated street hierarchy plan and a comparison of the change, respectively.

- **Provided a Continuous Bicycle/Pedestrian Access from Belle Isle Square to Route 1A -** The new tertiary street will also extend beyond the terminal auto cul-de-sac to create a continuous bicycle route, as well as a pedestrian connection along the southern edge of the Project Site. Refer to Figures 1.13a and 1.13b, and 1.14a and 1.14b for the updated pedestrian and bicycle connections plans and comparisons of the changes, respectively.
- **Walley Street Bicycle Connection -** the Proponent will study, design, and construct a cycle track or shared use path connection along Walley Street from the southeastern corner of the Project Site to Bennington Street providing a new pedestrian and bicycle crossing to the east side of Bennington Street to connect to the future extension of the East Boston Greenway as it is conceptually envisioned (Figures 1.14a and 1.14b).
- **Route 1A Entry Improvements -** As shown in Figure 1.15, the Route 1A site entrance has been redesigned into a rotary verses the previously proposed jug handle, which has the following additional benefits:
  - Create a better urban design entrance for the overall project by reducing the amount of highway infrastructure at the entrance of the Project Site;
  - Create a more pedestrian- and bicycle-friendly environment at this end of the Project Site;
  - Move turning traffic movements deeper into the Project Site and further away from Route 1A providing a longer queue for left turns;
  - Allow an additional connection from the tertiary road to shorten its cul-de-sac distance considerably; and
  - Improve on-site shuttle bus circulation at this portion of the Project Site.

1.2.3 Proposed Civic Uses

Indoor Civic Space

Since the DEIR/DPIR submission, the Proponent has considerably expanded the area of proposed indoor civic uses within the Master Plan Project from approximately 5,000 square feet to approximately 50,000 square feet. It is anticipated that approximately 40,000 square feet will be located within the City of Boston and 10,000 square feet in Revere.

Potential civic uses to be located within building space across the Master Plan Project could include the following:

- Community Center, such as an East Boston Social Centers Extension
- Neighborhood Health Centers
- Daycare Options
- Early Childhood Education
- Common, Non-Denominational Worship Space

- Potential East Boston Branch Library Extension
- Flexible Community Space
- Job Training Areas
- Visual and Performance Art Center
- Dance and Recreation Center
- Music Education Space
- Non-Profit Space

The Proponent will continue to work with the BPDA, City of Revere, and community on the design and integration of these indoor civic space uses into the Master Plan Project. As individual phases of the Master Plan Project advance, the location and design of the indoor civic spaces will be subject to a future development review process with the BPDA, as outlined in the PDA Documents (Appendix A).

Outdoor Civic Spaces

As previously described in the DEIR/DPIR, the Master Plan Project proposes a diverse mix of indoor and outdoor civic spaces, which will be programmed to support a variety of activity that reflect the diversity of the future users and to create equitable and accessible public spaces. Outdoor space for active use is scattered throughout the Project Site, including open fields for active recreation, exercise, and active play for all ages. Additionally, there are areas for passive use throughout the Project Site allowing for sitting, strolling, and relaxing while supporting local ecology. The diverse programming and activation strategies cater to the surrounding community, as well as the broader Cities of Boston and Revere, bringing spaces to life in different ways across all 12 months of the year. The public realm offerings are designed to be flexible to accommodate everyday uses and a changing array of events and activities, appealing to diverse populations and the needs for a variety of social interactions. As identified on Figure 1.16, the key outdoor civic spaces include:

- **Landscaped Outdoor Theater** – this area provides a distinct public amenity with stepped seating that can accommodate a variety of events. This area can be used for casual gathering and for curated events with steps allowing for larger audiences to view programmed cultural performances, experience interactive art installations, and engage in other community events.
- **Civic Node** – a public plaza and open space gathering area will front on the Horseshoe Pond, creating a new civic node within the Central Common. The area provides an active connection between the bustling retail street across the Central Common to Belle Isle Square and the Suffolk Downs MBTA Blue Line station.
- **Belle Isle Square** – this community and retail public promenade serves to connect and activate the area between the Suffolk Downs MBTA Blue Line station and the Central Common. A pedestrian bridge acts as a gateway from the T Stop to the neighborhood, leading visitors and locals to the square with its food kiosks, restaurants, and community spaces.

› **Beachmont Square** – an open space linking the Beachmont MBTA Blue Line station with the retail center of the new development. The Square provides a community gathering space and is integrated with retail offerings in a mixed residential and innovation/commercial neighborhood.

These outdoor civic and open space uses will incorporate existing wetland features, as well as active and passive recreation areas. They have been developed based on a robust community process and are further described in the PDA Documents (Appendix A).

The Proponent will continue to work with the BPDA, City of Revere, and community on the design and integration of these outdoor civic and open spaces into the Master Plan Project. As individual phases of the Project advance, the location and design of the outdoor civic spaces will be subject to a future Development Review Process with the BPDA, as outlined in the PDA Documents (Appendix A).

1.2.4 New/Expanded Green Building Initiatives and Energy Conservation Measures/GHG Emissions Mitigation

Material additional new Greenhouse Gas ("GHG") emissions mitigation has been agreed to by the Proponent. This was in response to state, BPDA, and community comments. These additional mitigation measures include:

› All buildings will be designed and built for solar readiness.
› Commitment to install 2MW of solar PV on building rooftops.
› All buildings will improve energy savings over current code:
  - 5% achieve over 50% energy savings;
  - 35% achieve 30% to 50% energy savings;
  - 55% achieve 18% to 30% energy savings; and
  - 5% achieve 10% to 18% energy savings.
› All buildings will be LEED Certifiable:
  - Minimum of 5% LEED Platinum Buildings;
  - Minimum of 75% LEED Gold Buildings; and
  - Maximum of 20% LEED Silver Buildings.
› Re-evaluated pathways to achieve higher levels of LEED certification for the office and residential components, including LEED for Neighborhood Development ("ND"). Refer to the updated LEED Scorecards presented in Figures 1.17a through 1.17c.
› Committed to design an apartment building through 100% schematic design that compares both a Passive House design strategy to a more typical apartment building with cost estimates to more effectively determine any increased costs of Passive House design.
› Committed to Passive House/E+ design for all 12 single-family homes along Waldemar Ave
› Committed to Passive House/E+ Buildings for all 22 townhomes on-site
› Construct a 50,000 SF+ Passive House multi-family residence in Phase 1B

1.2.5 Route 1A Corridor Improvement Changes

The Proponent has been meeting with a Transportation Working Group consisting of City of Boston, BTD, MassDOT, MBTA, Massport and other agencies in regard to Route 1A upgrades and configuration. As a result of these discussions and community input the following revisions are being considered for the Route 1A corridor:

- Developed a revised Route 1A improvement plan that maintains Boardman Street in its current "traditional design" with current turning movements to and from Boardman Street maintained. It serves as a modification to the originally proposed improvement plan by eliminating the Michigan Lefts (aka "Loons") on the Route 1A corridor. The overall design still improves operational functionality and capacity of the corridor, but also limits southbound traffic from overloading the tunnels into Boston and the surrounding East Boston neighborhoods.
- Consideration of a southbound Bus/HOV lanes on Route 1A in lieu of the previously proposed third vehicular southbound lane under the Michigan Lefts design alternative. This shift to a Bus/HOV lane from a vehicle travel lane would limit impacts on the tunnels and the East Boston neighborhoods. It would also improve bus travel times through the corridor. The Proponent will continue coordinating with the Transportation Working Group on the consideration of a southbound Bus/HOV lane on Route 1A.
- The Proponent continues to work with MassDOT on potential improvements to the Ted Williams Tunnel Exit, as well as the Storrow Drive exit to Cambridge Street/ Longfellow Bridge which is impacting Sumner Tunnel operations. MassDOT is currently taking information we have provided to date and is advancing plans for the Ted Williams Tunnel exit to South Boston. It is anticipated that these pavement marking improvements will be completed in the next six months. In addition, MassDOT has already implemented some restriping along Storrow Drive just prior to the Longfellow Bridge which is a component of potential improvements suggested by the Proponent that could also relieve downstream congestion that is impacting the Sumner Tunnel in the morning peak period.

The Proponent will continue to work with the City of Boston, BTD and the community as the Route 1A design is further advanced and implemented as part of the redevelopment of Suffolk Downs.

1.3 Status of Anticipated Permits/Approvals

Table 1-3 below presents a preliminary list of anticipated reviews and approvals of the Master Plan Project by federal, state, and City of Boston governmental agencies based on currently available information. It is possible that some of the listed reviews and approvals will not be required, or that additional reviews or approvals that will be required are not listed below.

Table 1-3 Anticipated Project Permits and Approvals

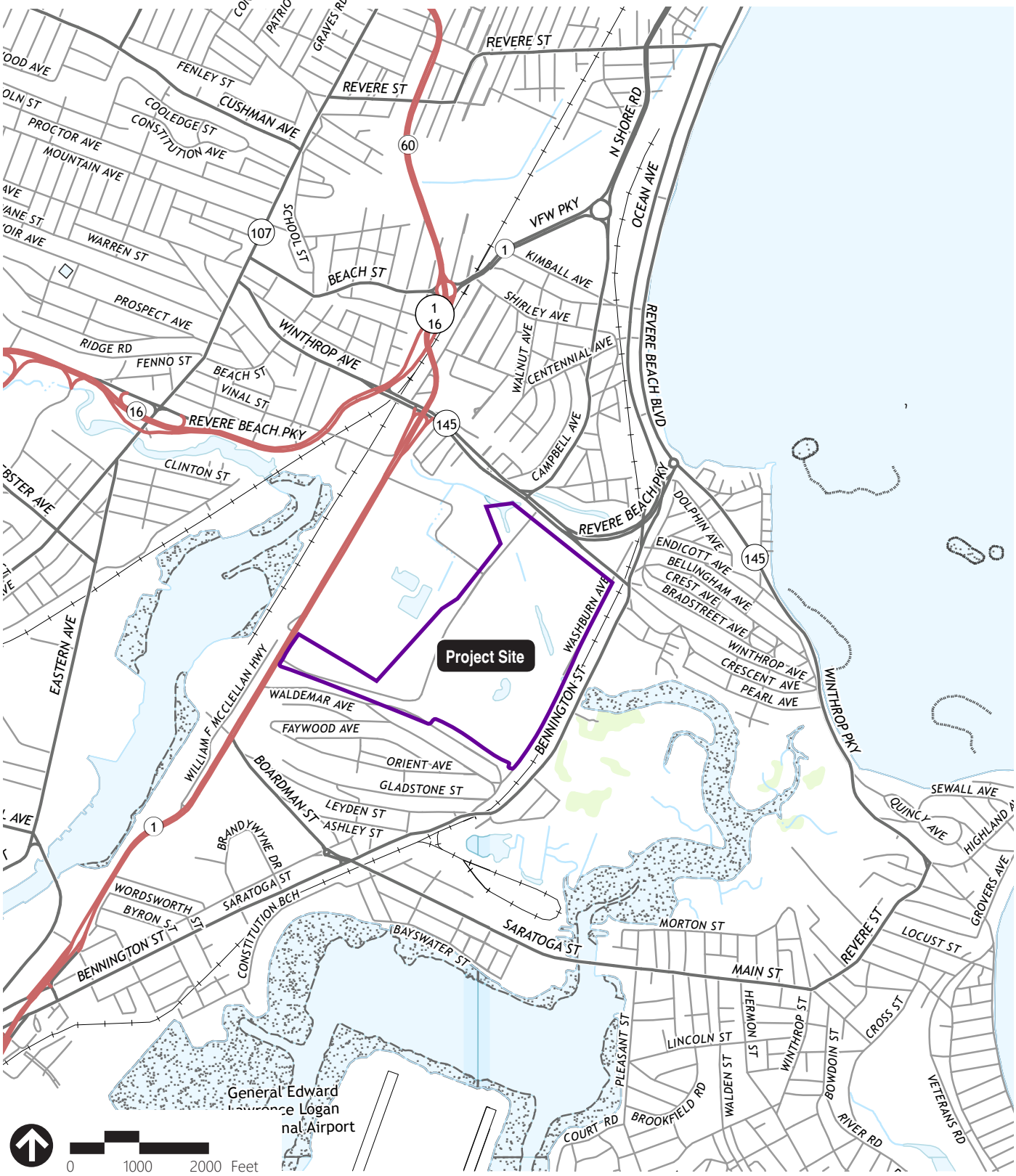
Agency/Department	Permit/Approval/Action	Status/Timing
Federal		
U.S. Environmental Protection Agency	National Pollutant Discharge Elimination System ("NPDES") and Construction General Permit	To be obtained prior to construction
	Modification, replacement and/or closure of existing NPDES permit respecting Concentrated Animal Feeding Operation ("CAFO")	To be obtained prior to construction
Federal Aviation Administration	Determination of Non-Hazard to Air Navigation	To be obtained prior to construction
U.S. Army Corps of Engineers	Review Under Massachusetts General Permit (if required)	To be obtained prior to construction
State		
Executive Office of Energy and Environmental Affairs	Massachusetts Environmental Policy Act Review Determination for Public Benefit review for landlocked tidelands	Review Ongoing. FEIR anticipated Summer 2019
Massachusetts Office of Coastal Zone Management	Federal Consistency Review	To be obtained prior to construction
Massachusetts Department of Environmental Protection	Environmental Results Program ("ERP") Certification for Engines	To be obtained prior to construction
	Superseding Orders of Conditions (if required)	
	Notice of Construction/Demolition	
	Asbestos Notices (if necessary)	
	Modification, replacement and/or closure of existing NPDES permit respecting CAFO	
	401 Water Quality Certification (if required)	
	Underground Injection Control Registration(s)	
	Beneficial Use Determination(s) (if required)	
	Chapter 91 License(s) , license amendments, and/or approval of minor modifications for off-site infrastructure and transportation improvements (as required)	
Massachusetts Department of Transportation	Vehicular Access Permit	To be obtained prior to construction
	Agreements and approvals for off-site infrastructure and/or transportation improvements (as required)	
Massachusetts Water Resources Authority	8(M) Permit (if required)	To be obtained prior to construction
	Direct Connect Permit (if required)	
	Temporary Construction Site Dewatering Permit (if required)	
	Permit for Service Extension under the MWRA Water Straddle Policy	
Massachusetts Historical Commission	Determination of No Adverse Impact (if necessary)	To be obtained prior to construction
Massachusetts Department of Conservation and Recreation	Access Permit	To be obtained prior to construction
Massachusetts Bay Transportation Authority	Agreement for improvements (i.e., signage, landscaping) at the Suffolk Downs and/or Beachmont MBTA Stations (if required)	To be obtained prior to construction
	Agreements and approvals for other off-site infrastructure and/or transportation improvements (as required)	
Massachusetts Port Authority	Agreements and approvals for off-site infrastructure and/or transportation improvements (as required)	To be obtained prior to construction

Table 1-3 Anticipated Project Permits and Approvals (Continued)

Agency/Department	Permit/Approval/Action	Status
City of Boston		
Boston Planning and Development Agency	Article 80B Large Project Review Adequacy Determination	Review Ongoing subject to this SID
	Zoning Relief respecting height and FAR limitations applicable to a PDA for the Project Site	Approved Nov. 15, 2018
	Planned Development Area and Development Plan Approval	Review Ongoing
	Cooperation Agreement	To be obtained following completion of Art. 80 Review
	Development Impact Project Agreement	
	Affordable Housing Agreement	
	Certificate of Compliance and Consistency	Post-Construction
Boston Zoning Commission	Zoning Relief respecting height and FAR limitations applicable to a PDA for the Project Site	Approved Dec. 12, 2018
	Planned Development Area and Development Plan Approval	Review Ongoing
Boston Civic Design Commission	Project Design Review (by building or phase)	To be completed prior to construction
Boston Landmarks Commission	Article 85 Demolition Delay Review	To be completed prior to construction
Boston Conservation Commission	Order of Conditions (under the Wetland Protection Act)	To be obtained prior to construction
	Orders of Conditions for off-site infrastructure and transportation improvements (as required)	
Boston Fire Department	Permits and Approvals for Fuel Storage, Fire Safety Equipment, Alarm System, Sprinkler, Standpipe, Smoke Control and Hydrant	To be obtained prior to construction
	Asbestos Removal Permit (if necessary)	To be obtained prior to demolition
Boston Public Works Department	Street Occupancy Permit and Street Lighting	To be obtained prior to construction
	Permits and Approvals for Curb Cuts	
Boston Transportation Department	Construction Management Plan	To be obtained prior to construction
	Street Opening/Closing	
	Transportation Access Plan Agreement	
Boston Public Improvements Commission	Specific Repair Plan	To be obtained prior to construction
	Excavation Support License (if required)	
Boston Water and Sewer Commission	Sewer Connection and Cross Connection and Extension Permits	To be obtained prior to construction
	Water Permit	
	Hydrant Permit	
	Site Plan Approval	
Boston Public Safety Commission	Fuel Storage License and Garage Permit	To be obtained prior to construction
Inspectional Services Department	Building Permits	To be obtained prior to construction
	Demolition Permits	
	Foundation Permits	
	Electrical and Gas Permits	
Boston Employment Commission	Boston Residents Construction Employment Plan	To be developed prior to construction
City of Boston	Agreements and approvals for off-site infrastructure and/or transportation improvements (as required)	To be obtained prior to construction

Table 1-3 Anticipated Project Permits and Approvals (Continued)

Agency/Department	Permit/Approval/Action	Status
City of Revere		
Revere City Council	Zoning Code Amendment**	To be obtained prior to construction
	Master Plan PUD Special Permit**	
	Permits and Approvals for Fuel Storage	
Revere Conservation Commission	Order of Conditions (under the Wetlands Protection Act and City of Revere Wetlands Bylaws)	To be obtained prior to construction
	Orders of Conditions for off-site infrastructure and transportation improvements (as required)	
Revere Department of Public Works	Sewer and Water Connection/Extension Permits	To be obtained prior to construction
	Permits and Approvals for Curb Cuts	
	Street Opening Permits	
Site Plan Review Committee	Site Plan Review	To be obtained prior to construction
Revere Project Review Board	Review in connection with the issuance of Special Permit	To be obtained prior to construction
Revere Planning Board	Review in connection with the Zoning Code Amendment**	To be obtained prior to construction
	Subdivision Plan Approval (including approval of street layouts)	
Revere Inspectional Services Department	Building Permits, Demolition Permits, Foundation Permits, Electrical and Gas Permits	To be obtained prior to construction



Source: USGS US Topo, Boston North, Lynn, 2015

Project Site

Figure 1.1

Locus Map

Suffolk Downs Redevelopment
Boston & Revere, Massachusetts

Source BING

Project Site

Town Line

Figure 1.2

Project Site Context

Suffolk Downs Redevelopment
Boston & Revere, Massachusetts

Source BING

Project Site

Town Line

Figure 1.3

Existing Conditions

Suffolk Downs Redevelopment
Boston & Revere, Massachusetts

Source:
Digital orthophotograph, MassGIS 2014.

Figure 1.4

Existing Site Photographs
Key Map

Suffolk Downs Redevelopment
Boston & Revere, Massachusetts

Prepared by Beals and Thomas, Inc.

1 Suffolk Downs MBTA Blue Line Station (October 20, 2017)

2 Project Site entrance looking north at the intersection of Tomasello Drive with Route 1A (October 20, 2017)

3 View looking east down Tomasello Drive (October 20, 2017)

4 Track and infield (October 20, 2017)

5 Grandstand building from Tomasello Drive (October 20, 2017)

6 Vacant former administration building from surface parking lot (October 20, 2017)

Source:
Photographs taken by Beals and Thomas, Inc.

Figure 1.5
Existing Site Photographs

Suffolk Downs Redevelopment
Boston & Revere, Massachusetts

7 Grandstand building from surface parking lot (October 20, 2017)

8 Eastern property boundary along Washburn Avenue (October 20, 2017)

9 View westerly from intersection of Winthrop Avenue and Revere Beach Parkway to the Project Site entrance at the intersection of Tomasello Drive with Winthrop Avenue (October 20, 2017)

10 Typical view of barns and stable area (January 6, 2017)

11 Sales Creek within infield (July 13, 2017)

12 View of the infield pond (May 25, 2017)

Source:
Photographs taken by Beals and Thomas, Inc.

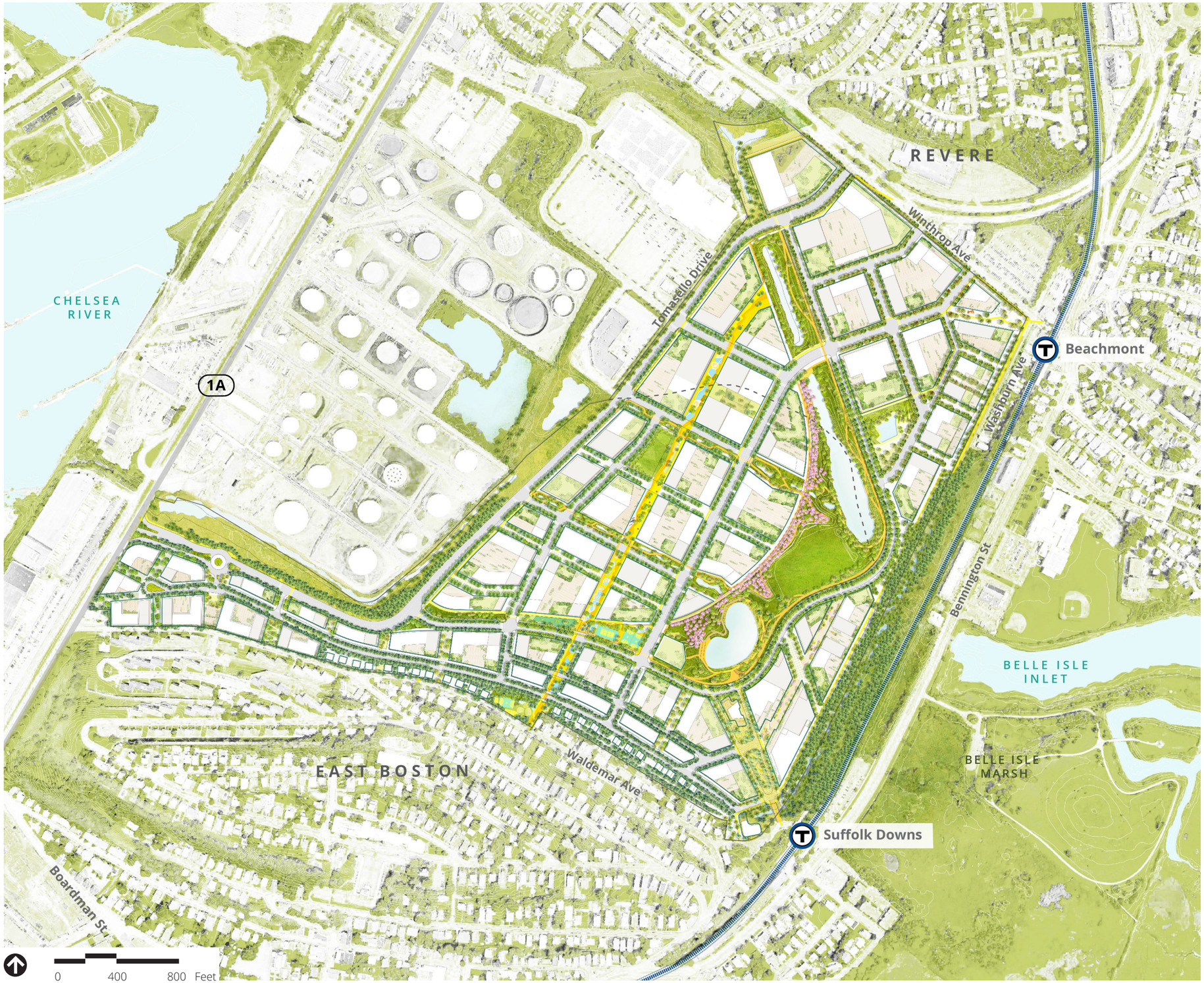
Figure 1.6
Existing Site Photographs

Suffolk Downs Redevelopment
Boston & Revere, Massachusetts

Source: cbt

Figure 1.7
Previously Reviewed Conceptual Master Plan (DEIR/DPIR)

Suffolk Downs Redevelopment
Boston & Revere, Massachusetts

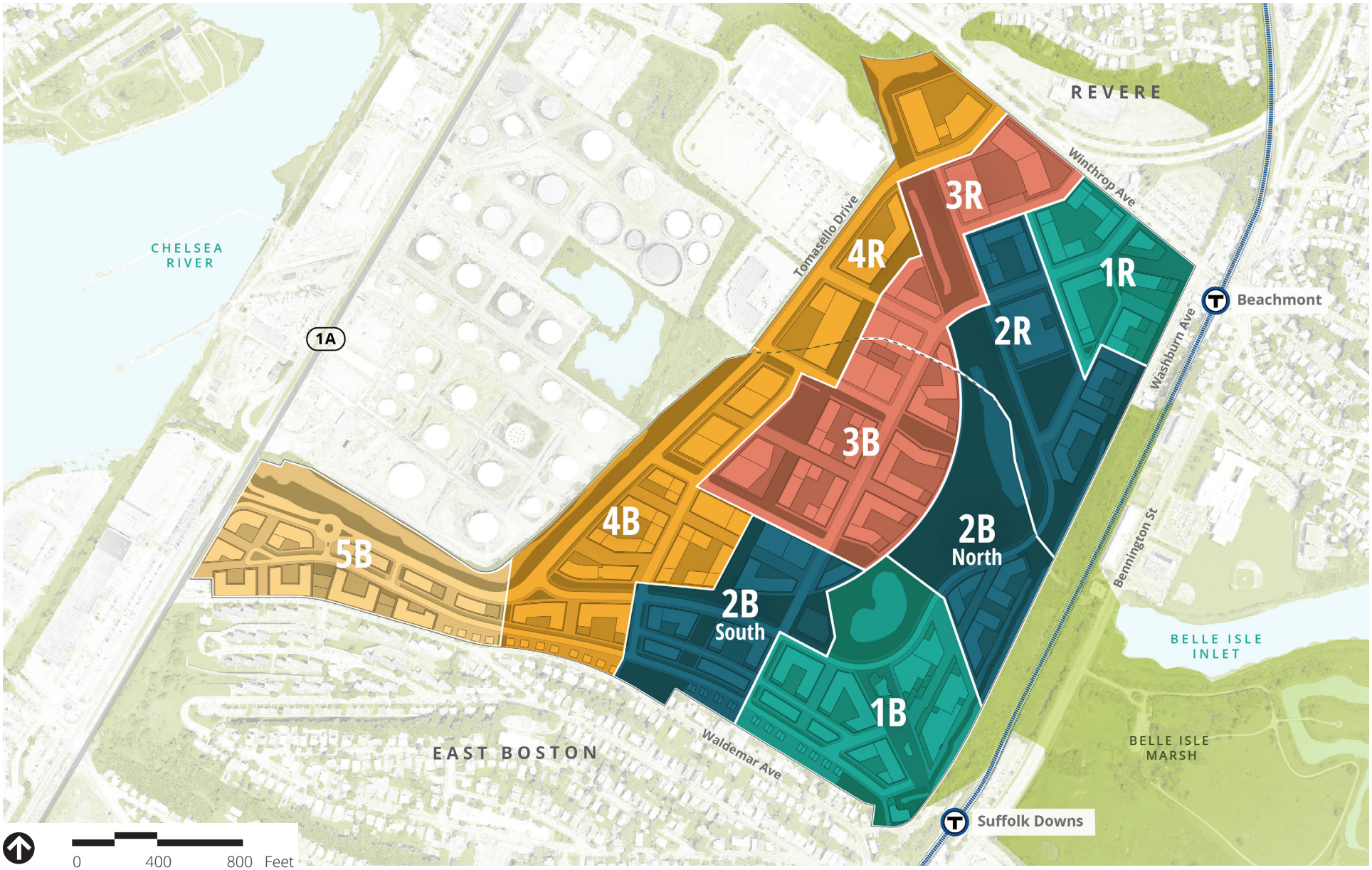


Source: cbt

Figure 1.8
Currently Proposed Conceptual Master Plan

Suffolk Downs Redevelopment
Boston & Revere, Massachusetts

U:\HYMSuffolkDownsMPFS\174001\04_Presentation\08_2019_Boston-Permitting_PDA-Community

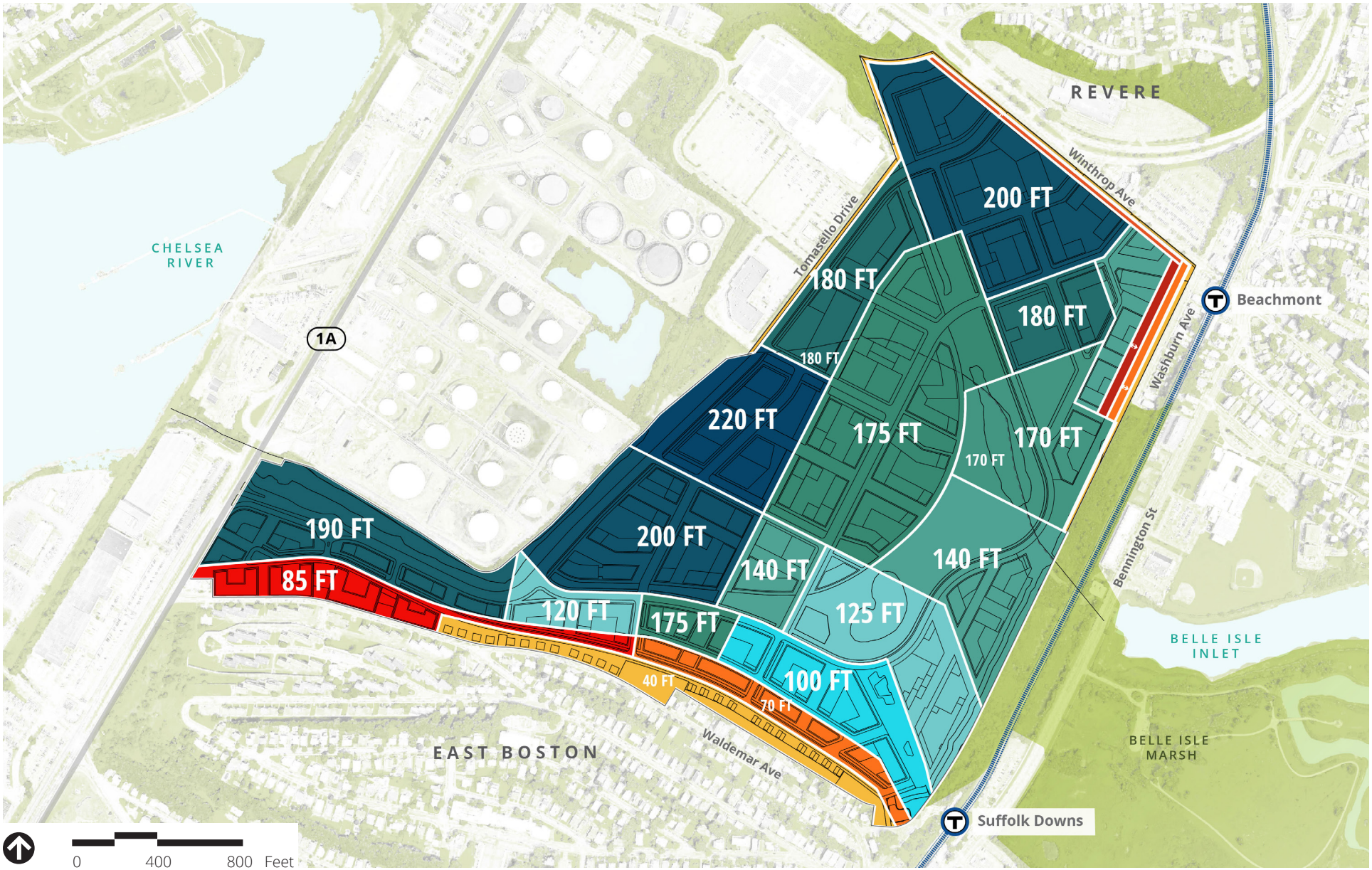


Source: cbt

Figure 1.9
Phasing Plan

Suffolk Downs Redevelopment
Boston & Revere, Massachusetts

U:\HYMSuffolkDownsMPFS\174001\04_Presentation\08_2019_Boston-Permitting_PDA-Community

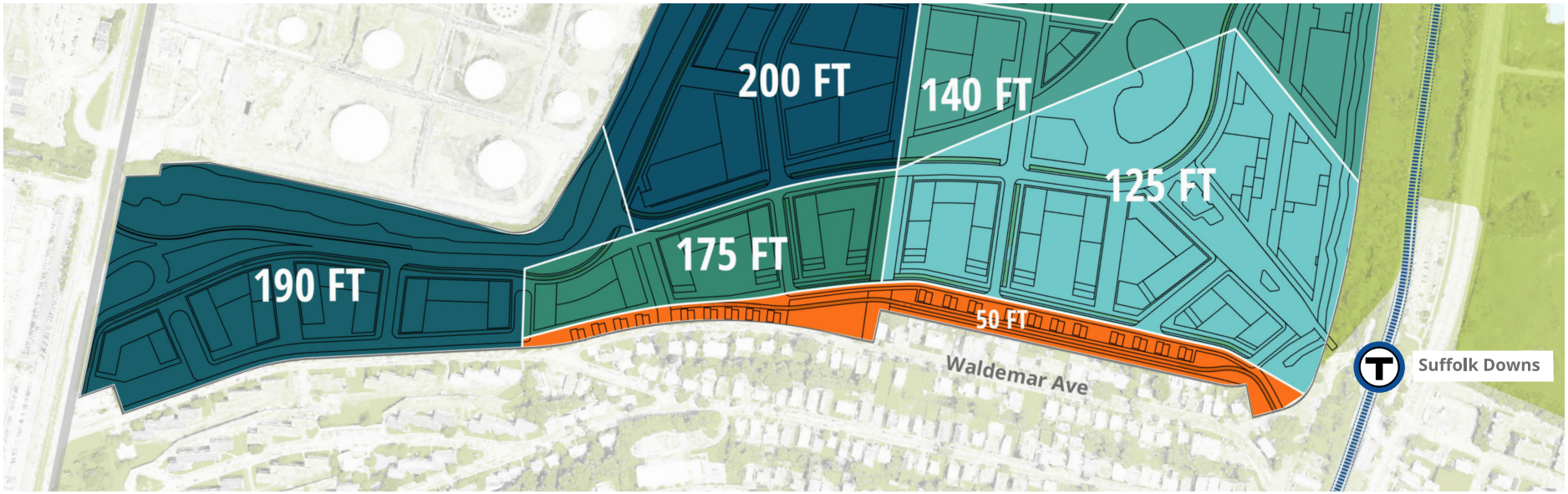


Source: cbt

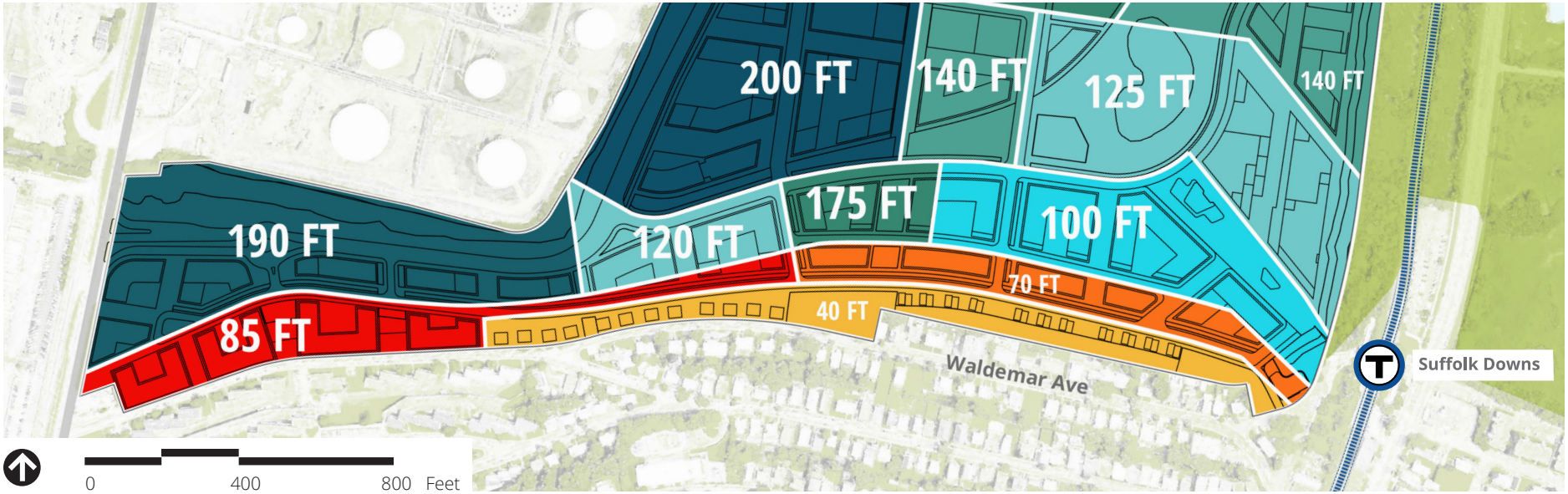
Figure 1.10a
Height Zone Plan

Suffolk Downs Redevelopment
Boston & Revere, Massachusetts

U:\HYMSuffolkDownsMPFS\174001\04_Presentation\08_2019_Boston-Permitting_PDA-Community



DPIR



Design Updates

Source: cbt

Figure 1.10b
Height Zone Plan Comparison

Suffolk Downs Redevelopment
Boston & Revere, Massachusetts

U:\HYMSuffolkDownsMPFS\174001\04_Presentation\08_2019_Boston-Permitting_PDA-Community

Source: cbt

XX Block number

Figure 1.11a
Block Morphology Plan

Suffolk Downs Redevelopment
Boston & Revere, Massachusetts

U:\HYMSuffolkDownsMPFS\174001\04_Presentation\08_2019_Boston-Permitting_PDA-Community

45 Blocks

20 Single Family/ Townhomes

DPIR

60 Blocks

23 Single Family/ Townhomes

Design Updates

0 400 800 Feet

Source: cbt

XX Block number

Figure 1.11b
Block Morphology Plan Comparison

Suffolk Downs Redevelopment
Boston & Revere, Massachusetts

U:\HYMSuffolkDownsMPFS\174001\04_Presentation\08_2019_Boston-Permitting_PDA-Community

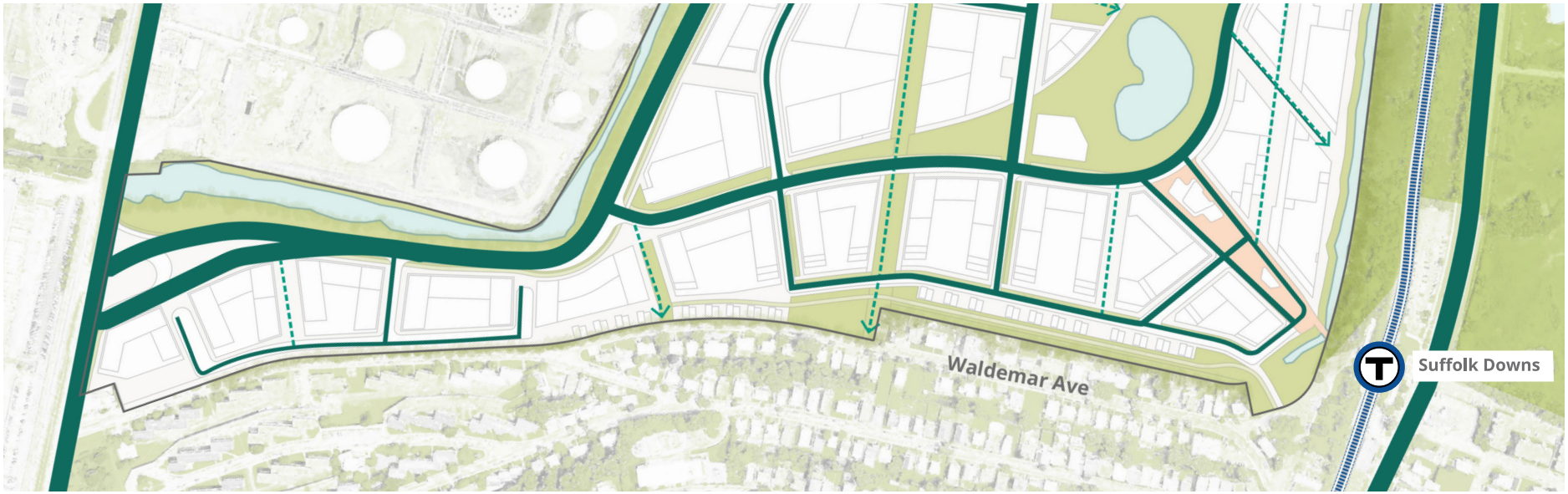
Source: cbt

- Vehicular Thoroughfare
- Primary Street
- Secondary Street
- Tertiary Street
- Shared Street (Service)

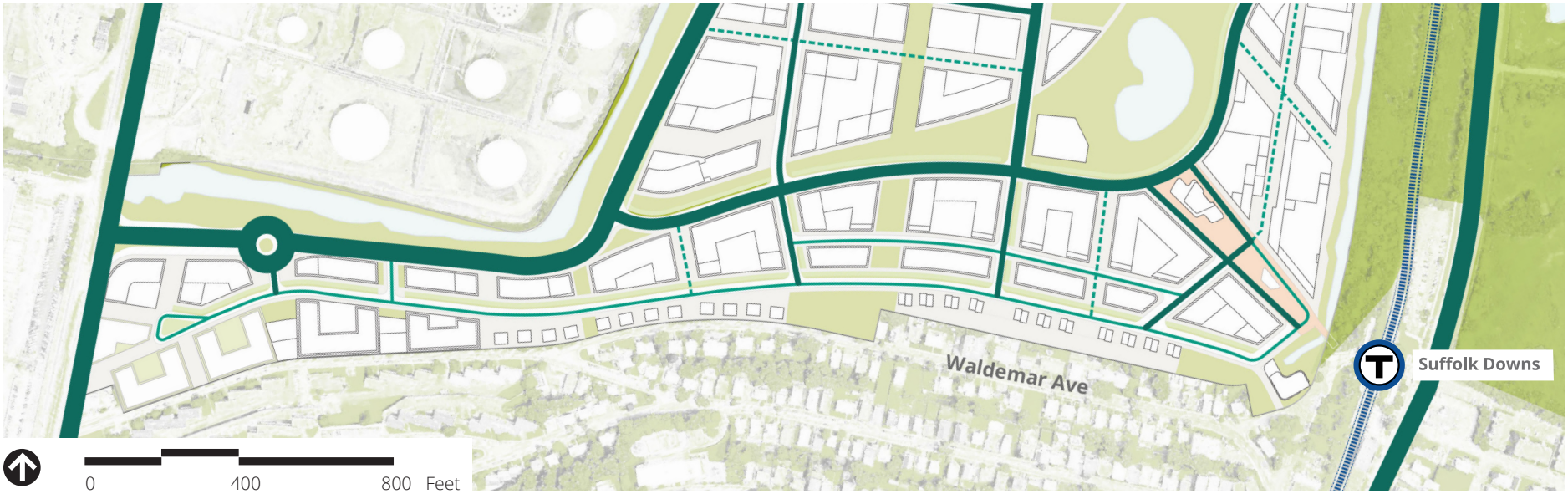
Figure 1.12a
Street Hierarchy Plan

Suffolk Downs Redevelopment
Boston & Revere, Massachusetts

U:\HYMSuffolkDownsMPFS\174001\04_Presentation\08_2019_Boston-Permitting_PDA-Community



DPIR



Design Updates

0 400 800 Feet

Source: cbt

Vehicular Thoroughfare
Primary Street
Secondary Street
Tertiary Street
Shared Street (Service)

Figure 1.12b
Street Hierarchy Plan Comparison

Suffolk Downs Redevelopment
Boston & Revere, Massachusetts

U:\HYMSuffolkDownsMPFS\174001\04_Presentation\08_2019_Boston-Permitting_PDA-Community

Source: cbt

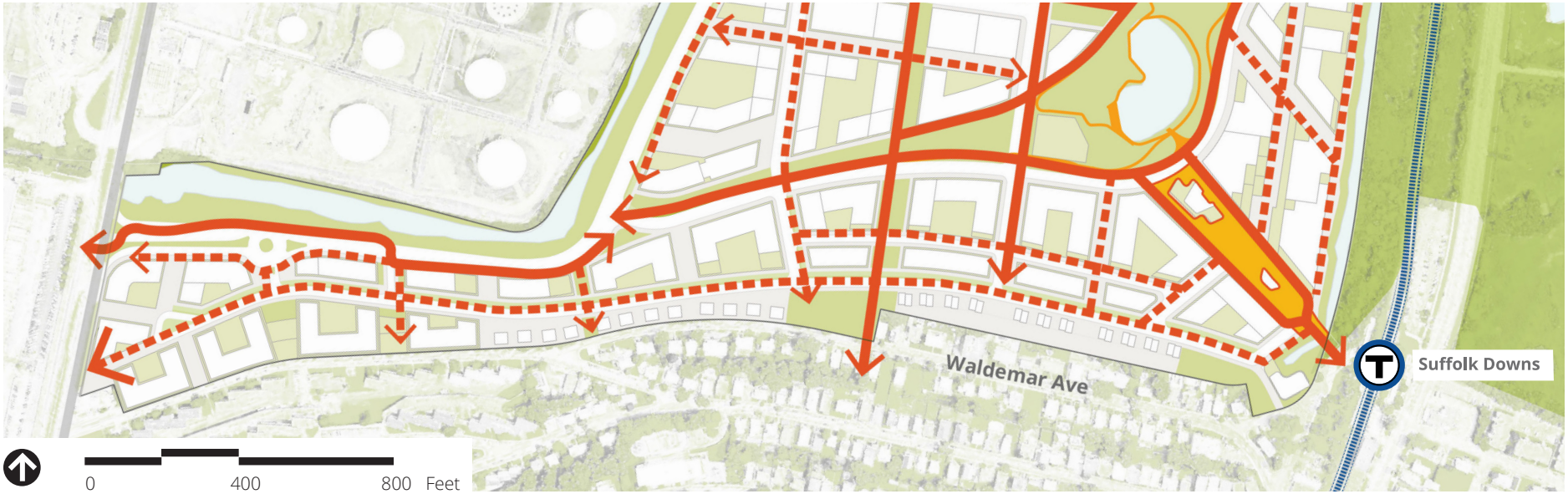
- Pedestrian Pathways
- Plaza
- Pedestrian Connections

Figure 1.13a
Access and Circulation - Pedestrian Network Plan

Suffolk Downs Redevelopment
Boston & Revere, Massachusetts

U:\HYMSuffolkDownsMPFS\174001\04_Presentation\08_2019_Boston-Permitting_PDA-Community

DPIR



Design Updates

0 400 800 Feet

Source: cbt

- Pedestrian Pathways
- Plaza
- Pedestrian Connections

Figure 1.13b
Access and Circulation - Pedestrian Network Plan Comparison

Suffolk Downs Redevelopment
Boston & Revere, Massachusetts

U:\HYMSuffolkDownsMPFS\174001\04_Presentation\08_2019_Boston-Permitting_PDA-Community

Source: cbt

- Cycle Track
- Designated Bike Lane
- Shared Lane
- Potential Public Bike Share Location

Figure 1.14a
Access and Circulation - Bike Network Plan

Suffolk Downs Redevelopment
Boston & Revere, Massachusetts

DPIR

Design Updates

0 400 800 Feet

Source: cbt

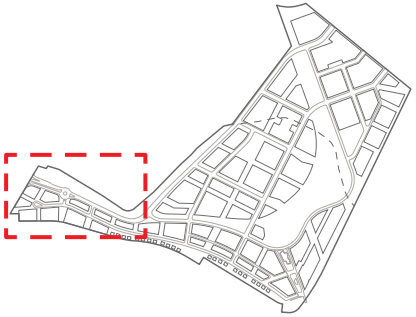
- Cycle Track
- Designated Bike Lane
- Shared Lane
- Potential Public Bike Share Location

Figure 1.14b
Access and Circulation - Bike Network Plan Comparison

Suffolk Downs Redevelopment
Boston & Revere, Massachusetts

DPIR

Design Updates



Source: cbt

Figure 1.15
Rt 1A Entrance Plan Comparison

Suffolk Downs Redevelopment
Boston & Revere, Massachusetts

Source: STOSS

Figure 1.16
Proposed Civic Spaces

Suffolk Downs Redevelopment
Boston & Revere, Massachusetts

LEED v4 for Neighborhood Development Plan
Project Checklist

Project Name: Suffolk Downs
Date: 4/24/2019

Yes	?	No			
11	**9**	**8**	**Smart Location & Linkage**		**28**
Y			Prereq	Smart Location - Yes + Option 3 Tranit Corridor	Required
Y			Prereq	Imperiled Species and Ecological Communities	Required
Y			Prereq	Wetland and Water Body Conservation	Required
Y			Prereq	Agricultural Land Conservation	Required
Y			Prereq	Floodplain Avoidance	Required
5	2	3	Credit	Preferred Locations	10
		2	Credit	Brownfield Remediation	2
5	2		Credit	Access to Quality Transit	7
1	1		Credit	Bicycle Facilities	2
	1	2	Credit	Housing and Jobs Proximity	3
	1		Credit	Steep Slope Protection	1
		1	Credit	Site Design for Habitat or Wetland and Water Body Conservation	1
	1		Credit	Restoration of Habitat or Wetlands and Water Bodies	1
	1		Credit	Long-Term Conservation Management of Habitat or Wetlands and Water Bodies	1

18	**14**	**9**	**Neighborhood Pattern & Design**		**41**
Y			Prereq	Walkable Streets	Required
Y			Prereq	Compact Development	Required
Y			Prereq	Connected and Open Community	Required
4		5	Credit	Walkable Streets	9
5	1		Credit	Compact Development (FAR 2.4)	6
2	2		Credit	Mixed-Use Neighborhoods	4
2	2	3	Credit	Housing Types and Affordability	7
	1		Credit	Reduced Parking Footprint	1
	2		Credit	Connected and Open Community	2
1			Credit	Transit Facilities	1
	2		Credit	Transportation Demand Management	2
1			Credit	Access to Civic & Public Space	1
	1		Credit	Access to Recreation Facilities	1
1			Credit	Visitability and Universal Design	1
1	1		Credit	Community Outreach and Involvement	2
	1		Credit	Local Food Production	1
1	1		Credit	Tree-Lined and Shaded Streetscapes	2
		1	Credit	Neighborhood Schools	1

Yes	?	No			
15	**4**	**12**	**Green Infrastructure & Buildings**		**31**
Y			Prereq	Certified Green Building	Required
Y			Prereq	Minimum Building Energy Performance	Required
Y			Prereq	Indoor Water Use Reduction	Required
Y			Prereq	Construction Activity Pollution Prevention	Required
5			Credit	Certified Green Buildings (>50% is LEED certified)	5
2			Credit	Optimize Building Energy Performance (1pt = 12% 2pts = 20%)	2
		1	Credit	Indoor Water Use Reduction (40%)	1
2			Credit	Outdoor Water Use Reduction (1pt =30% / 2pts = 50%)	2
		1	Credit	Building Reuse	1
		2	Credit	Historic Resource Preservation and Adaptive Reuse	2
1			Credit	Minimized Site Disturbance	1
1	1	2	Credit	Rainwater Management (2pts = 85th percentile + 1 bonus pt)	4
1			Credit	Heat Island Reduction (roof)	1
		1	Credit	Solar Orientation	1
	2	1	Credit	Renewable Energy Production (1 pt = 5%)	3
		2	Credit	District Heating and Cooling	2
1			Credit	Infrastructure Energy Efficiency (15% savings pumps, street + traffic lights)	1
		2	Credit	Wastewater Management (25% reuse on site)	2
1			Credit	Recycled and Reused Infrastructure (> 50%)	1
1			Credit	Solid Waste Management	1
	1		Credit	Light Pollution Reduction	1

3	**3**	**0**	**Innovation & Design Process**		**6**
3	2		Credit	Innovation	5
	1		Credit	LEED® Accredited Professional (LEED AP-ND)	1

2	**2**	**0**	**Regional Priority Credits**		**4**
1			Credit	Regional Priority Credit: Access to civic and public space (1pt)	1
	1		Credit	Regional Priority Credit: TDM (1 pt)	1
1			Credit	Regional Priority Credit: Optimize energy performance (2pt)	1
	1		Credit	Regional Priority Credit: Housing Types & Afforability (4 pts)	1

49	**32**	**29**	**PROJECT TOTALS (Certification estimates)**	110

Certified: 40-49 points, **Silver:** 50-59 points, **Gold:** 60-79 points, **Platinum:** 80+ points

Figure 1.17a

LEED Checklist - Neighborhood Development

Suffolk Downs Redevelopment
Boston & Revere, Massachusetts

LEED v4 for BD+C: Core and Shell

Project Checklist

Project Name: Suffolk Downs Redevelopment - OFFICE Typology
Date: 4/24/2019

Y	?	N			
1			Credit	Integrative Process	1

10	6	4	Location and Transportation		20
			Credit 1	LEED for Neighborhood Development Location	20
2			Credit 2	Sensitive Land Protection	2
		3	Credit 3	High Priority Site	3
3	3		Credit 4	Surrounding Density and Diverse Uses	6
3	3		Credit 5	Access to Quality Transit	6
1			Credit 6	Bicycle Facilities	1
		1	Credit 7	Reduced Parking Footprint	1
1			Credit 8	Green Vehicles	1

6	3	2	Sustainable Sites		11
Y			Prereq	Construction Activity Pollution Prevention	Required
1			Credit 1	Site Assessment	1
		2	Credit 2	Site Development - Protect or Restore Habitat	2
	1		Credit 3	Open Space (30% Site Area incl. Bldg Footprint)	1
1	2		Credit 4	Rainwater Management	3
2			Credit 5	Heat Island Reduction	2
1			Credit 6	Light Pollution Reduction	1
1			Credit 7	Tenant Design and Construction Guidelines	1

5	4	2	Water Efficiency		11
Y			Prereq	Outdoor Water Use Reduction	Required
Y			Prereq	Indoor Water Use Reduction	Required
Y			Prereq	Building-Level Water Metering	Required
1	1		Credit 1	Outdoor Water Use Reduction (50% reduction)	2
3	1	2	Credit 2	Indoor Water Use Reduction (3 pts = 35% reduction)	6
	2		Credit 3	Cooling Tower Water Use	2
1			Credit 4	Water Metering	1

20	5	8	Energy and Atmosphere		33
Y			Prereq	Fundamental Commissioning and Verification	Required
Y			Prereq	Minimum Energy Performance	Required
Y			Prereq	Building-Level Energy Metering	Required
Y			Prereq	Fundamental Refrigerant Management	Required
5	1		Credit 1	Enhanced Commissioning	6
13	1	4	Credit 2	Optimize Energy Performance (13 pts = 29% energy cost savin	18
1			Credit 3	Advanced Energy Metering	1
	2		Credit 4	Demand Response	2
	1	2	Credit 5	Renewable Energy Production	3
1			Credit 6	Enhanced Refrigerant Management	1
		2	Credit 7	Green Power and Carbon Offsets	2

5	2	7	Materials and Resources		14
Y			Prereq	Storage and Collection of Recyclables	Required
Y			Prereq	Construction and Demolition Waste Management Planning	Required
		6	Credit 1	Building Life-Cycle Impact Reduction	6
1	1		Credit 2	Building Product Disclosure and Optimization - Environmental Product Declarations	2
1		1	Credit 3	Building Product Disclosure and Optimization - Sourcing of Raw Materials	2
1	1		Credit 4	Building Product Disclosure and Optimization - Material Ingredients	2
2			Credit 5	Construction and Demolition Waste Management (75% + 4 streams)	2

6	2	2	Indoor Environmental Quality		10
Y			Prereq	Minimum Indoor Air Quality Performance	Required
Y			Prereq	Environmental Tobacco Smoke Control	Required
2			Credit 1	Enhanced Indoor Air Quality Strategies	2
2	1		Credit 2	Low-Emitting Materials	3
1			Credit 3	Construction Indoor Air Quality Management Plan	1
	1	2	Credit 4	Daylight	3
1			Credit 5	Quality Views	1

6	0	0	Innovation		6
5			Credit 1	Innovation	5
1			Credit 2	LEED Accredited Professional	1

1	2	1	Regional Priority		4
	1		Credit 1	Regional Priority: Rainwater Management (2 points)	1
1			Credit 2	Regional Priority: Energy Performance (8 pts = 17%)	1
	1		Credit 3	Regional Priority: Indoor Water Use Reduction (4 pts = 40% reduction)	1
		1	Credit 4	Regional Priority: High Priority Site or Renewable Energy (2 pts = 3%)	1

60	24	26	TOTALS	Possible Points:	110

Certified: 40 to 49 points, **Silver:** 50 to 59 points, **Gold:** 60 to 79 points, **Platinum:** 80 to 110

Figure 1.17b

LEED Checklist - Office

Suffolk Downs Redevelopment
Boston & Revere, Massachusetts

LEED v4 for BD+C: New Construction and Major Renovation

Project Checklist

Project Name: Suffolk Downs Redevelopment - RESIDENTIAL Typology
Date: 4/24/2019

Y	?	N			
1			Credit	Integrative Process	1

9	4	3	Location and Transportation		16
			Credit 1	LEED for Neighborhood Development Location	16
1			Credit 2	Sensitive Land Protection	1
		2	Credit 3	High Priority Site	2
3	2		Credit 4	Surrounding Density and Diverse Uses	5
3	2		Credit 5	Access to Quality Transit	5
1			Credit 6	Bicycle Facilities	1
		1	Credit 7	Reduced Parking Footprint	1
1			Credit 8	Green Vehicles	1

5	3	2	Sustainable Sites		10
Y			Prereq	Construction Activity Pollution Prevention	Required
1			Credit	Site Assessment	1
		2	Credit	Site Development - Protect or Restore Habitat	2
	1		Credit	Open Space (30% Site Area incl. Bldg Footprint)	1
1	2		Credit	Rainwater Management	3
2			Credit	Heat Island Reduction	2
1			Credit	Light Pollution Reduction	1

5	4	2	Water Efficiency		11
Y			Prereq	Outdoor Water Use Reduction	Required
Y			Prereq	Indoor Water Use Reduction	Required
Y			Prereq	Building-Level Water Metering	Required
1	1		Credit	Outdoor Water Use Reduction (50% reduction)	2
3	1	2	Credit	Indoor Water Use Reduction (35% reduction)	6
	2		Credit	Cooling Tower Water Use	2
1			Credit	Water Metering	1

17	6	10	Energy and Atmosphere		33
Y			Prereq	Fundamental Commissioning and Verification	Required
Y			Prereq	Minimum Energy Performance	Required
Y			Prereq	Building-Level Energy Metering	Required
Y			Prereq	Fundamental Refrigerant Management	Required
5	1		Credit	Enhanced Commissioning	6
11	4	3	Credit	Optimize Energy Performance (26% cost savings)	18
		1	Credit	Advanced Energy Metering	1
		2	Credit	Demand Response	2
	1	2	Credit	Renewable Energy Production	3
1			Credit	Enhanced Refrigerant Management	1
		2	Credit	Green Power and Carbon Offsets	2

5	2	6	Materials and Resources		13
Y			Prereq	Storage and Collection of Recyclables	Required
Y			Prereq	Construction and Demolition Waste Management Planning	Required
		5	Credit	Building Life-Cycle Impact Reduction	5
1	1		Credit	Building Product Disclosure and Optimization - Environmental Product Declarations	2
1		1	Credit	Building Product Disclosure and Optimization - Sourcing of Raw Materials	2
1	1		Credit	Building Product Disclosure and Optimization - Material Ingredients	2
2			Credit	Construction and Demolition Waste Management (75% + 4 streams)	2

11	4	1	Indoor Environmental Quality		16
Y			Prereq	Minimum Indoor Air Quality Performance	Required
Y			Prereq	Environmental Tobacco Smoke Control	Required
2			Credit	Enhanced Indoor Air Quality Strategies	2
2	1		Credit	Low-Emitting Materials	3
1			Credit	Construction Indoor Air Quality Management Plan	1
1	1		Credit	Indoor Air Quality Assessment	2
1			Credit	Thermal Comfort	1
1	1		Credit	Interior Lighting	2
2	1		Credit	Daylight	3
1			Credit	Quality Views	1
		1	Credit	Acoustic Performance	1

6	0	0	Innovation		6
5			Credit	Innovation	5
1			Credit	LEED Accredited Professional	1

1	2	1	Regional Priority		4
	1		Credit	Regional Priority: Rainwater Management (2 points)	1
1			Credit	Regional Priority: Energy Performance (8 pts = 17%)	1
	1		Credit	Regional Priority: Indoor Water Use Reduction (4 pts = 40% reduction)	1
		1	Credit	Regional Priority: High Priority Site or Renewable Energy (2 pts = 3%)	1

60	25	25	TOTALS	Possible Points:	110

Certified: 40 to 49 points, **Silver:** 50 to 59 points, **Gold:** 60 to 79 points, **Platinum:** 80 to 110

Figure 1.17c

LEED Checklist - Residential

Suffolk Downs Redevelopment
Boston & Revere, Massachusetts

2

Response to DPIR Comments

This chapter presents direct responses to the BPDA Supplemental Information Request ("SIR") on the DPIR, as well as agency and public comments submitted to the BPDA. Each agency, organization, and IAG letter received during the comment period on the DPIR is assigned a number, as listed in Table 2-1 below, and each individual comment is delineated with a code that corresponds to the response code. Numerous comments were also submitted from members of the public. Responses to these comments are provided by topic in Section 2.6 below, as many of the letters had duplicative comments and/or expressed a similar array of concerns.

Copies of the SIR and each agency, organization, and IAG comment letter received during the public review period of the DPIR are in included in Appendix B. Comments from the public are included in Appendix C.

Table 2-1 List of Comment Letters Received on the DPIR

Letter No.	Commenter	Affiliation/Comment Letter Topic	Date
SD	Boston Planning and Development Agency	Request for Supplemental Information	February 12, 2019
1	Boston Transportation Department and BPDA Transportation Planning Staff	Transportation	February 12, 2019
2	BPDA Planning and Urban Design Staff	Planning/Urban Design/Open Space	February 12, 2019
3	BPDA Environment and Climate Change Planning Staff	Environmental/Climate Change Resiliency/Article 37	February 12, 2019
4	Manuel Esquivel, Senior Infrastructure & Energy Planning Fellow	Smart Utilities	February 12, 2019
5	John P. Sullivan	Boston Water & Sewer Commission	December 14, 2018
6	Carrie Marsh	Boston Parks and Recreation Commission	December 17, 2018
7	Zach Wassmouth	Boston Public Works Department	December 14, 2018

Letter No.	Commenter	Affiliation/Comment Letter Topic	Date
8	Joseph Arangio, Jr.	IAG Member	December 12, 2018
9	Ernani Jose DeAraujo	IAG Member	December 13, 2018
10	Madeleine Steczynski	IAG Member	December 14, 2018
11	Mayor Brian M. Arrigo	City of Revere	December 14, 2018
12-20	General Public[1]	Various	Various

1 Refer to Appendix C for copies of the comments received by the general public.

2.1 BPDA Request for Supplemental Information (RSI)

Comment RSI.1

Written comments in response to the DPIR from BPDA staff are included in Appendix A and must be answered in their entirety.

Response

Responses to BDPA staff comments are provided herein, Section 2.1. The delineated RSI and BPDA staff memos are provided in Appendix B for reference.

Comment RSI.2

Written comments in response to the DPIR received by the BPDA from elected officials, other public agencies, and the general public are included in Appendix B and must be answered in their entirety.

Response

Refer to Section 2.3 for responses to IAG comments, Section 2.4 for responses to elected official comments, and Section 2.5 for responses to community group comments. The delineated comments are provided in Appendix B for reference.

Section 2.6 provides global responses to public comments, which are related to the following themes or topics:

1. Affordable housing;
2. Construction related impacts;
3. Building height and density;
4. Traffic; and
5. Impacts on local resources and services.

Copies of all public comments are provided in Appendix C for reference.

Comment RSI.3

The Proponent should clearly define civic uses that are proposed on the site. The amount of civic uses should be identified in land use tables and communicated in any diagrams and renderings where civic uses are integrated with building.

Response

The Master Plan Project includes a diverse mix of indoor and outdoor civic spaces, which will be programmed to support a variety of activity that reflect the diversity of the future users and to create equitable and accessible public spaces. Since the

DEIR/DPIR in response to the community, the Proponent has considerably expanded the area of proposed indoor civic uses within the Master Plan Project from approximately 5,000 square feet to approximately 50,000 square feet. It is anticipated that approximately 40,000 square feet will be located within the City of Boston and 10,000 square feet in Revere. Potential civic uses to be located in the Master Plan Project could include the following:

- Community Center such as an East Boston Social Centers Extension
- Neighborhood Health Centers
- Daycare Options
- Early Childhood Education
- Common, Non-Denominational Worship Space
- Potential East Boston Branch Library Extension
- Flexible Community Space
- Job Training Areas
- Visual and Performance Art Center
- Dance and Recreation Center
- Music Education Space
- Non-Profit Space

As described in the DEIR/DPIR, outdoor space for active use is scattered throughout the Project Site, including open fields for active recreation, exercise, and active play for all ages. Additionally, there are areas for passive use throughout the Project Site allowing for sitting, strolling, and relaxing while supporting local ecology. The diverse programming and activation strategies cater to the surrounding community, as well as the broader Cities of Boston and Revere, bringing spaces to life in different ways across all 12 months of the year. The public realm offerings are designed to be flexible to accommodate everyday uses and a changing array of events and activities, appealing to diverse populations and the needs for a variety of social interactions. The four key outdoor civic spaces identified in Figure 1.16 include:

- **Landscaped Outdoor Theater** – this area provides a distinct public amenity with stepped seating that can accommodate a variety of events. This area can be used for casual gathering and for curated events with steps allowing for larger audiences to view programmed cultural performances, experience interactive art installations, and engage in other community events.
- **Civic Node** – a public plaza and open space gathering area will front on the Horseshoe Pond, creating a new civic node within the Central Common. The area provides an active connection between the bustling retail street across the Central Common to Belle Isle Square and the Suffolk Downs MBTA Blue Line station.
- **Belle Isle Square** – this community and retail public promenade serves to connect and activate the area between the Suffolk Downs MBTA Blue Line

station and the Central Common. A pedestrian bridge acts as a gateway from the T Stop to the neighborhood, leading visitors and locals to the square with its food kiosks, restaurants, and community spaces.

- **Beachmont Square** – an open space linking the Beachmont MBTA Blue Line station with the retail center of the new development. The Square provides a community gathering space and is integrated with retail offerings in a mixed residential and innovation/commercial neighborhood.

The proposed civic uses have been developed based on a robust community process and are described in detail in the draft PDA Documents, which were submitted to the BPDA on February 1, 2018, in both English and Spanish, and are subject to an ongoing public review process. The Proponent will continue to work with the BPDA, City of Revere, and community on the design and integration of these both the outdoor civic and open spaces as well as the indoor civic space uses into the Master Plan Project. As individual phases of the Project advance, the location and design of these civic spaces will be subject to a future Development Review Process with the BPDA, as outlined in the draft PDA Documents accessible via the web links provided in Appendix A.

Comment RSI.4

The Proponent should provide a parcelization diagram. Area calculations including parcel area, gross square footage, ground floor footprint, and floor area ratio ("FAR") must be provided per building.

Response

Initial parcelization diagrams and area calculations, including parcel area, gross square footage, and ground floor footprint, are included in the PDA Development Plans, which are provided for reference via the web links provided in Appendix A.

The Floor Area Ratio (FAR) for the Boston portion of the Project Site as a whole will not exceed 2.3, and maximum gross square footages and heights for individual building shall be in accordance with the requirements set forth in the PDA Documents, with detailed parcelization diagrams and related calculations to be provided as site area details are further defined through the future design and development impact review, as established in Section 15 – Development Review Procedures of the PDA Development Plan for each phase (Appendix A).

Comment RSI.5

The Proponent should continue to work with BPDA to determine an appropriate average household size estimate for transportation and municipal impact modeling purposes.

Response

As part of the bi-weekly Transportation Working Group meetings, which include MassDOT, MEPA, MBTA, BPDA, BTD, Massport, CTPS, the City of Revere, and the Proponent and transportation consultants, the Proponent and the City of Boston reviewed and agreed on the average household size for transportation modeling and municipal impact modeling purposes. The household size is 1.59 for the City of Boston and 1.58 for the overall Master plan Project, which includes a mix of unit types (apartments, condominiums and senior housing). Within those housing types, the Proponent is providing a variety of unit sizes ranging from microunits, studios, one bedrooms, two bedrooms and three bedrooms. 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.

Comment RSI.6

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

Response

Refer to the updated permits and approvals list in Table 1-3 in Section 1.3 of Chapter 1, *Project Overview and Supplemental Information*.

Comment RSI.7

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

Response

Given the size and scale of the Master Plan Project, it is subject to MEPA review by state agencies and the public. The environmental/development impact review documentation submitted to date has been provided as joint filings to satisfy both the MEPA regulations and Article 80B of the Code (the Expanded Environmental Notification Form/Expanded Project Notification Form, or "EENF/EPNF", in November 2017 and the DEIR/DPIR in October 2018). To allow adequate review of this documentation, the Proponent agreed to extended public review and comment periods beyond the required amount of time.

2.2 Responses to City Agency Comments

Letter 1: Boston Transportation Department and BPDA Transportation Planning Staff

Comment 1.1

Improve and update the modeling completed as part of the DPIR and ensuring that modeling accurately reflects the population that will live and work at the site.

Response

As part of the bi-weekly Transportation Working Group meetings, which includes MassDOT, MBTA, Massport, DCR and the City of Boston, among others, the Proponent and the City reviewed and agreed on the housing and employment assumptions to be used in the traffic analysis for the FEIR. The household size assumption is 1.58 for Suffolk Downs and the employment assumption is four employees per 1000 square feet of office space and 0.5 employees per 1000 square feet of retail. In addition, employment for the hotels is assumed to be 0.74 employees per key. Refer to response to Comment RSI.5 above for additional discussion of the assumed average household size.

Comment 1.2

Account for transit as a key part of the mitigation package, including analysis to improve resiliency and capacity of the Blue Line, analysis of the Blue-Red Connector, improvements and long-term maintenance of the Suffolk Downs Blue Line Station, timing of transit mitigation, and other key issues.

Response

Per the MBTA's "FY20-24 Capital Investment Plan: Sources and Uses" presentation dated 4/9/2019, which outlines funding sources and draft uses for the MBTA's FY20-24 Capital Investment Plan ("CIP"), a total of $15 million will be programmed to support advancement of preliminary engineering and environmental review through regulatory approval for the Red-Blue Connector project. The Proponent is working in coordination with CTPS to further analyze the impacts of the Red-Blue Connector on travel times and transit mode share for Project-related trips. This analysis will be based on updated ridership modeling results prepared by the CTPS based on Program B. A summary of the Red-Blue Connector analysis findings will be provided in the FEIR.

Since the filing of the DEIR/DPIR, the Proponent is actively working with the MBTA and MassDOT on the refinement of the Master Plan Project's transit improvement mitigation package, including an evaluation of the Suffolk Downs MBTA Blue Line

Station conditions and needed improvements. This package of transit mitigation commitments and timing of implementation will be provided in the FEIR.

The DEIR/DPIR included detailed climate change modeling analysis which described the potential impacts to the two MBTA Blue Line stations, Suffolk Downs and Beachmont stations, as well as the train tracks connecting the two stations. Proposed climate resiliency improvements, specifically the potential of a berm barrier system along Bennington Street was explored, which would provide protection to both MBTA Blue Line Stations, the blue line train tracks, Bennington Street, Beachmont Square area and other neighborhoods along the Sales Creek watershed.

The Proponent has also completed existing conditions and code assessments of both the Suffolk Downs and Beachmont stations. These studies have identified deficiencies and potential improvements to the two stations and have been submitted to the MBTA for further review.

Comment 1.3

Commit to a robust publicly-accessible shuttle from the site to South Station via the Seaport District, with improvements that could eventually provide an EZ-Ride type service to the project site.

Response

Sections 6.10 and 6.13.2 of Chapter 6, *Transportation*, of the DEIR/DPIR presented the proposed publicly-accessible shuttle routes, which included connections to South Station and the Seaport District from the Project Site. The Proponent is actively working with the City of Boston, the MBTA and MassDOT on the evaluation and further refinement of the Proponent's commitments regarding the implementation of new regional shuttle services. This evaluation includes refinement of the shuttle connections proposed in the DEIR/DPIR, such as consideration of a single shuttle route that would connect the Project Site to South Station via a stop in the Seaport District. Updated ridership modeling results currently being prepared by CTPS staff based on Program B will inform the shuttle evaluation and resulting commitments to be provided in the FEIR. The evaluation will include service routes and schedule characteristics, timing of service implementation, and monitoring of use.

Comment 1.4

Commit to design and construction of an improved Route 1A and key intersections to accommodate additional and reduce cut-through traffic with a consideration for HOV lanes management.

Response

The Proponent has committed $50 million to improve local and regional infrastructure including significant improvements to Route 1A and surrounding intersections, to be designed and constructed as part of the Master Plan Project, as well as a robust TDM program, shuttle bus service serving the Suffolk Downs and Beachmont MBTA Blue Line stations, shuttle bus service to off-site locations, bicycle parking and bike-sharing facilities.

The Proponent is actively working the MassDOT and the Transportation Working Group to define the Preferred Alternative for the Route 1A corridor improvements for which the Proponent will design and construct as part of the $50 million mitigation package. Consideration of a southbound bus/HOV lanes on Route 1A was part of early discussions with MassDOT. This southbound Bus/HOV lane would be in lieu of the third proposed vehicular lane southbound. This shift to a Bus/HOV lane from a vehicle travel lane would limit impacts on the tunnels and the East Boston neighborhoods. Also, MassDOT is focusing on transit improvements in the area of Suffolk Downs such as rerouting regional buses that currently go through the tunnels to Blue Line Stations resulting in materially reduced transit commuting times. A detailed description, as well as supporting conceptual plans of the updated Route 1A corridor will be provided in the FEIR.

Comment 1.5

Expand the bike transportation and site access strategy, including definition of locations of Bluebike Stations on the site and an extension of the East Boston Greenway to the site.

Response

The number of proposed BlueBike Stations has been re-evaluated based on comments/feedback received on the DEIR/DPIR. The average spacing in of bike share stations in the Boston central business district was determined to be approximately 307 yards. Using this, the Proponent proposes to install bike share stations at an approximate 300-yard frequency. This would yield seven bike share stations within the Boston portion of the Project Site (See Figure 1.14a) or eleven overall for the site, which is six more than previously proposed. Two additional stations would be located at the MBTA transit stations. Please refer to the response to Comment 1.29 below for additional information). The proposed station locations and sizes of each will be determined through close coordination with BTD/BPDA as each development phase is advanced.

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., In addition, the Proponent will design and construct a cycle track or shared use path connection along Walley Street from the southeastern

corner of the Project Site to Bennington Street. This will provide for an effective crossing to the east side of Bennington Street to connect to the future extension of the East Boston Greenway as it is conceptually envisioned.

Comment 1.6

Refine bike lane and cycle track design on site per City and State standards for bikeability.

Response

Internal design of separated bike lanes/cycle tracks within the Project Site will follow the MassDOT Separated Bike Lane Planning & Design Guide (2015) and the Boston Complete Streets Design Guidelines (2013). Any bike lakes internal to the Project Site will be designed to follow the MassDOT Project Development and Design Guide (2006). Any shared use paths internal to the Project Site will follow the AASHTO Guide to the Development of Bicycle Facilities (current edition)

In addition, in response to community and BPDA urban design staff comments/feedback the Proponent has modified the proposed Main Street bicycle facilities from protected bike lanes to raised cycle tracks.

Comment 1.7

Mode Share: *First, the City believes that the Proponent should consider Go Boston 2030 mode shares in any discussion of mode share with this project. Certain assumptions are made using a CTPS model and a "TOD" model and are discussed further in this response. Generally, the Proponent should call back to Go Boston 2030 goals and how they are helping to reach those goals through mitigation or on-site transportation improvements. Transportation mitigation is generally not considered to include on-site improvements such as bike facilities or roadway design within a site. Mitigation should be discussed as improvements that will directly offset transportation impacts off-site for each mode.*

Response

The Proponent agrees that the Go Boston 2030 mode shares should be utilized. In the DEIR/DPIR, the Proponent provided a separate analysis of "TOD mode shares" to reflect this. The Proponent is actively working with CTPS to establish future mode shares for the Project. In addition, the Proponent is actively working with the Transportation Working Group, which includes MassDOT, MEPA, MBTA, BPDA, BTD, Massport, CTPS, the City of Revere, and the Proponent and transportation consultants on the proposed mode share and to further define the mitigation program for off-site traffic impacts, as well as transit demand. The DEIR/DPIR provided detail on proposed traffic and transit mitigation, including proposed timing of that mitigation. Additional details of the proposed traffic and transit mitigation will be defined in the FEIR.

Comment 1.8

Modified & Enhanced Bus Service: *Scoping comments from the City asked the Proponent to discuss bus capacity and service enhancements with the MBTA. The DPIR states that the Proponent will monitor this capacity as buildout happens, but no set plan is outlined. In our recent discussions with the MBTA, MassDOT, and the Proponent, enhancing bus service has been a topic of interest. It is important that the Proponent include any findings or commitments in future filings for this proposal.*

Response

The Proponent is actively working with the MBTA and MassDOT on studying bus capacity impacts and evaluating bus service enhancements near and to the Project Site. Potential service enhancements may include new bus stops and connections for existing bus services and extensions or modifications of bus service routes to connect North Shore transit riders to Suffolk Downs and nearby MBTA Blue Line tations. The FEIR will provide updated documentation of the bus capacity analysis findings (based on updated ridership forecasts from the revised CTPS model results based on Program B), recommended bus service changes (in coordination with the MBTA and MassDOT), and a summary of the Proponent's proposed transit improvement and monitoring commitments for the Master Plan Project. In addition, the Proponent has committed to extensive transportation monitoring of on-site uses which will be submitted annually to the City of Boston.

Comment 1.9

Local Buses: *Study extending Bus Route #120 or comparable transit/shuttle connection into the heart of the project site and increasing headways to at least every 15 minutes.*

Response

As stated in the response to Comment 1.8 above, the Proponent is actively working with the MBTA and MassDOT on evaluating bus service enhancements in the vicinity of the Project Site, including potential bus connections into and within the Project Site. It is expected that as the site gets built out that the Route 119 Bus will further modify its route on-site with additional stops. This will be done in conjunction with the MBTA and the community as the site gets built out. No changes are proposed for the Route 120, which already provides a strong service between the Orient Heights neighborhood and the Blue Line; bringing the Route 120 into the site would lead to schedule disruptions to that service that may adversely affect the intended purpose of that route. Instead, the project site design will facilitate pedestrian and bicycle connections between Suffolk Downs and Orient Heights.

Comment 1.10

Suffolk Downs Station: *The proponent should analyze the cost and feasibility of renovating and bringing Suffolk Downs Station up to current code. The analysis should include the potential to establish a public connection to Belle Isle Marsh and fortifying the station against sea level rise.*

Response

The Proponent conducted an existing conditions and code evaluation of Suffolk Downs Station and Beachmont Station in January 2019. The existing conditions code evaluations identified and documented observed code deficiencies and recommended corrective actions for upgrades to Suffolk Downs Station based on current ridership and occupant loading.

The Proponent has evaluated extensively in the DEIR/DPIR the flow of water onto and off the Suffolk Downs project site and abutting properties (including the MBTA Suffolk Downs Station). The DEIR/DPIR modeling results estimate that the Suffolk Downs MBTA Station would experience some limited flooding during a 1.5-feet sea level rise scenario coupled with a 100-year storm event, and moderate flooding during a 4.2-feet sea level rise scenario coupled with a 100-year storm event under a no-build condition. Under both scenarios the model estimates that the at grade parking lot would be inundated with several feet of water. The Proponent continues to refine and expand this resiliency assessment with an analysis of the flood protection benefits and effectiveness of a regional barrier along Bennington Street and Route 1A to the Project Site and abutting properties, which includes the Suffolk Down MBTA Blue Line Station and a portion of the train tracks. The Proponent has also committed to conducting a feasibility study for a regional flood protection barrier along Bennington Street which would provide material protection to both MBTA Blue Line stations, the blue line train tracks, Bennington Street, Beachmont Square area and other neighborhoods along the Sales Creek watershed.

Comment 1.11

Blue Line: *Using the most recent 2018 trip data for the Blue Line, the proponent should estimate the additional ridership the project will generate on the Blue Line and what times of day those impacts will occur. The proponent should also work with MBTA and MassDOT on the methodology for estimating future transit demand.*

Response

Since the filing of the DEIR/DPIR, the Proponent has actively coordinated with the MBTA and MassDOT to obtain the most recent trip data for estimating future transit demand for the Master Plan Project. The Proponent has also confirmed with MassDOT and the MBTA that the methodology for analyzing transit trips it has used in the DEIR/DPIR is the correct methodology. Also, it is important to note that the Proponent did use the most recent data available at the time of the DEIR/DPIR.

However, per the request of the City of Boston the Proponent is re-running the analysis based on the most recent MBTA data available. The Proponent is currently re-analyzing the Master Plan Project's impacts to Blue Line ridership based on the most recent baseline data provided by the MBTA and updated ridership modeling results by CTPS for Program B. A summary of the updated findings of the Blue Line ridership and capacity analysis will be provided in the FEIR.

Comment 1.12

Red-Blue Connector: *The DPIR only addresses the impacts of the Red-Blue Connector qualitatively, declaring that there would be a positive impact without quantification. Further analysis should be conducted to determine the impact on travel times and transit mode share for project trips assuming the Red-Blue connector is in place.*

Response

As stated previously in the response to Comment 1.2 above, the Proponent is working in coordination with the CTPS staff to further analyze the impacts of a potential Red-Blue Connector on travel times and transit mode share for Master Plan Project trips. This analysis will be based on updated ridership modeling results prepared by CTPS based on Program B. A summary of the Red-Blue Connector analysis findings will be provided in the FEIR. Please note that the Red-Blue Connector is not proposed as mitigation for the Project, but its additional evaluation was requested both by the City of Boston and MassDOT, and the Proponent is working to accommodate these requests.

Comment 1.13

Suffolk Downs to Seaport/South Station: *The Proponent should work with the City to ensure the shuttle that operates between the development site and South Station/Seaport includes the following elements:*

- *Publicly Accessible: The shuttle should include elements that allow members of the public to access the shuttle such as an onboard fare payment system and/or compatibility with the MBTA's AFC 2.0 system. The shuttle should be branded to clearly identify it as publicly accessible. Additionally, it should meet full ADA Accessibility standards. A comparable program is the EZ Ride shuttle that operates between North Station and Cambridge.*
- *Frequency: The shuttle should operate at ten (10) minute or better headways during peak commuting periods in both directions. This will enable passengers commuting to and from the site to use this shuttle as a primary means of access. Additionally, the shuttle should operate at least every fifteen (15) minutes off peak during the midday and evening. Operating hours should be extensive and defined in the next development review submission.*
- *Stops: The Proponent should coordinate with the City on Shuttle bus stops. At a minimum, the shuttle should make stops at Bennington Street/Route 1A,*

Addison Street/Route 1A, Logan Airport, Congress Street (in the vicinity of World Trade Center Station), Summer Street/Melcher Street, and South Station.

- *Coordination: The Proponent should commit to coordinating with the City on the Seaport Transit Strategic Plan which will include an analysis of shuttle bus routes in the Seaport District and how this shuttle might fit into other consolidated shuttle services and operations. The proponent should commit to a monitoring program of this service in the Transportation Access Plan Agreement with BTD.*
- *Timing: The Proponent should commit to a specific timeline for Shuttle implementation. This should coincide with a maximum of 3 million square feet of development on the proposed site.*

Response

The Proponent commits to provision of a publicly accessible shuttle connecting the Project Site to South Station via the Seaport. This shuttle service shall include a fare system that is usable by the public and shall fully meet ADA accessibility standards. The Proponent commits to continued coordination with the City to refine the proposed shuttle bus stops as the service is planned and implemented.

The Proponent commits to coordination with the City on the Seaport Transit Strategic Plan. The Proponent will enter into a TAPA with the BTD, which will include monitoring of shuttle services as part of the Project's commitment to a comprehensive transportation monitoring program.

The timing of shuttle service implementation and service characteristics, such as span and frequency of service, will be based on and designed to support demand resulting from the build-out of the Master Plan Project. The Project's comprehensive monitoring program will inform periodic refinements to the shuttle service.

Comment 1.14

North Station/Chelsea Shuttle Services: *The Proponent should further define other shuttle connections in the next round of project submittals, including the connections outlined to the Orange Line and Commuter Rail. These shuttle services should generally be publicly-accessible, frequent enough to enable viable use during peak period commuting, fully ADA accessible, and fully coordinated with the City.*

Response

The Proponent commits to provision of a publicly accessible shuttle connecting the Project Site to South Station via Seaport, North Station and Chelsea Station. These shuttle services shall include a fare system that is usable by the public and shall fully meet ADA accessibility standards. The Proponent commits to continued coordination with the City to refine the proposed shuttle service details as they are

planned and implemented. The timing of shuttle service implementation and service characteristics, such as span and frequency of service, will be based on and designed to support demand resulting from the build-out of the Master Plan Project. The Project's comprehensive monitoring program will inform periodic refinements to the shuttle service.

The proposed shuttle to Chelsea Station would operate via Route 16, providing connections between the Project Site and the MBTA's Newburyport/Rockport Commuter Rail Line. It is intended that this shuttle route would provide connections between the MBTA's Newburyport/Rockport Commuter Rail Line and the Project Site until implementation of the potential new "Revere Center" Station and the potential Wonderland Station Connector.

Comment 1.15

Route 1A: *The proponent should commit to:*

- *Conducting a traffic analysis that accounts for most recent 2018 trip volume data for the Sumner Tunnel, Ted Williams Tunnel and Route 1A. These counts should be used as a base to project traffic conditions for future years using growth rates that are consistent with the rate of traffic increase over the last 10 years.*
- *A design and construction proposal that accommodates increases in traffic volumes generated by the project to decrease impact on neighborhood streets. The Proponent should further explore HOV and/or bus lanes on Route 1A with concepts that include international best practices for managed lanes. Additionally, the proponent should consider the evaluation of right-of-way dimensional constraints. The proponent should carefully consider resiliency as well bike and pedestrian crossings and connections on Route 1A to ensure the road is safe for all users.*
- *Design proposals for off-site mitigation at the Sumner Tunnel connection to Storrow Drive, and potentially at connections to the Ted Williams Tunnel to increase roadway safety, transit connections, and resiliency.*
- *The Proponent should clarify site roadway ownership with relevant City agencies.*

The Proponent should work with the City to define a detailed scope and timeline for analysis and design related to the proposed improvements.

Response

The most recent tunnel counts were utilized in the DEIR/DPIR traffic analysis and, per the request of the City of Boston and MassDOT the Proponent has conducted additional traffic counts in 2019. These updated traffic counts will be utilized in the updated Program B traffic for the FEIR.

The Proponent will continue coordinating with the Transportation Working Group on the analysis and conceptual improvements to the two tunnels. MassDOT is currently taking information we have provided to date and is advancing plans for the Ted Williams Tunnel exit to South Boston. It is anticipated that these improvements will be completed in the next six months. In addition, MassDOT has already implemented some restriping along Storrow Drive just prior to the Longfellow Bridge, which is a component of potential improvements suggested by the Proponent that could also relieve downstream congestion that is impacting the Sumner Tunnel in the morning peak period.

Consideration of a southbound Bus/HOV lanes on Route 1A is part of current discussions with the Transportation Working Group. This southbound Bus/HOV lane would be in lieu of the third proposed vehicular lane southbound. This shift to a Bus/HOV lane from a vehicle travel lane would limit impacts on the tunnels and the East Boston neighborhoods. Also, MassDOT is focusing on transit improvements in the area of Suffolk Downs such as rerouting regional buses that currently go through the tunnels to Blue Line Stations resulting in materially reduced transit commuting times. A detailed description, as well as supporting conceptual plans of the updated Route 1A corridor will be provided in the FEIR.

Regarding site roadway ownership, all on-site roadways will be owned and maintained by the Proponent but built to City standards and publicly accessible.

Comment 1.16

Household Size: *The Proponent's modeling assumed approximately 1.58 persons per household; however, additional information and details are needed to justify this number.*

- *The Average household size in East Boston is currently 2.8 persons per dwelling unit. While average household in the proposed project may not reach averages found in the rest of the East Boston neighborhood, the Proponent does not provide a detailed methodology for how the project will be at 1.58 in the DPIR.*
- *The City received information from the Proponent about anticipated unit types(number of studios, one beds, two beds, etc.) with anticipated average occupancy rates by type (e.g. an assumption of 2.5 persons per 3 bedroom). However, there is no backup data (i.e. comparable projects, comparable census tracts, etc.) and analysis to justify the very low average household sizes proposed by the Proponent. Such data should be provided, with specific projects referenced, to explain the household sizes assumed by the proponent.*

…we believe that the average household size assumed for modeling purposes should be closer to 2 persons per household. The Proponent should continue to work with BPDA to determine an appropriate average household size to use in transportation and municipal impact modeling.

Response

Refer to response to Comment 1.1 above.

Comment 1.17

Employees/Office Square Footage Ratio: *The Proponent should state explicitly what ratio is assumed for employees/office square footage. These ratios should reflect averages in comparable developments of the City and region. The Proponent should provide examples of comparable commercial and residential buildings in in the City and base modeling averages on these.*

Response

Refer to response to Comment 1.1 above.

Comment 1.18

A full transportation analysis should be completed for a Program B scenario, even though it is alluded to as having less of an impact in the DPIR.

Response

Program B will have less impact than the previously submitted Program A. However, a full analysis of Program B is being prepared upon completion of the CTPS modeling results. The revised transportation analysis will be provided in the FEIR.

Comment 1.19

Mode Share: *The Proponent must take into consideration the mode share goals outlined in Go Boston 2030. The scoping comments submitted by the City originally stated a citywide mode share goal for transit of 45%. However, individual neighborhood transit mode share goals were determined to be a one-third increase. Using this neighborhood-specific methodology would yield a 48% transit mode share goal for East Boston. The Proponent should discuss how they are helping to meet this transit mode share goal as well as the other mode share goals in Go Boston 2030.*

Response

Refer to response to Comment 1.7 above.

Comment 1.20

Phasing: *The five (5) proposed phases should include approximate timelines so that the City can understanding the timing of transportation impacts.*

Response

Table 2-2 below provides the approximate anticipated timelines for each of the five phases of development proposed within the Boston portion of the Master Plan Project. This conceptual phasing plan assumes favorable market conditions.

Table 2-2 Anticipated Timing for Master Plan Project Phases

Phase	Anticipated Year(s)
Phase 1B	2020-2024
Phase 2B-North, Phase 2B-South	2024-2028
Phase 3B	2028-2032
Phase 4B	2032-2036
Phase 5B	2036-2040

Comment 1.21

In order to monitor transportation impacts on an ongoing basis, the Proponent should be prepared to provide annual updated mode share data, parking utilization data, and level of service for key intersections to be determined by BPDA and the Proponent.

Response

A comprehensive transportation monitoring program was proposed as part of the DEIR/DPIR and will be incorporated into the Master TAPA agreement with BTD. This program is expected to include traffic counts to verify trip generation for the Master Plan Project, as well as transit ridership monitoring to validate projected mode shares. The results of the transportation monitoring program will be reported annually to MassDOT and the City of Boston. This information will also be provided as part of future BPDA Design/Development Review Process for each phase of development and/or individual buildings as they are advanced (as described in the response to Comment RSI.4 above). This annual monitoring will also include parking utilization data. The transportation monitoring program is anticipated to be memorialized in the master Transportation Access Plan Agreement ("TAPA") for the City of Boston portion of the Master Plan Project.

Comment 1.22

Expanded Impacts Area: *While the initial transportation modeling was relatively comprehensive, more needs to be done in order to understand regional impacts. The City mentioned in scoping comments that the Proponent should include regional connections and bridges leading into East Boston. Specifically, the City asked that connections through the tunnels, the Chelsea Street Bridge, and the Meridian Street Bridge be considered in analysis. The Proponent should either 1) discuss why they did not include these in the analysis or 2) include them in additional filings for the project.*

Response

Supplemental traffic counts are currently being conducted for the Meridian Street Bridge and Chelsea Street Bridge. While the traffic analysis conducted for the DEIR/DPIR indicated very minimal Project-generated traffic for those bridges, the revised TIA currently being prepared for the FEIR will revisit the trip distribution based on the latest CTPS model results based on Program B.

Comment 1.23

Parking Ratios: *As mentioned in previous scoping comments, the City believes that a lower set of parking ratios must be used for this site. The Proponent should consider the following parking ratios: 0.6/residential unit and 1/1000 sf office, retail, lab.*

Response

The parking ratios proposed for the Master Plan Project are consistent with those recommended by the City transportation staff and are lower than what typically would be proposed for a comparable project that did not have excellent access to public transportation.

As discussed in the DEIR/DPIR (Section 6.8.2 of Chapter 6, *Transportation*), for the City of Boston portion of the Project Site, the Proponent proposes the following maximum parking ratios (which are similar to other Transit Oriented Development ("TOD") sites situated in urban settings similar to that of the Project Site):

- Office: 1.0 spaces per 1,000 SF
- Lab: 1.0 spaces per 1,000 SF
- Residential: 0.5 space per senior housing unit, 0.5 space per apartment unit, and 1.0 space per condominium unit (resulting in an average of 0.63 spaces per residential unit)
- Hotel: 0.5 spaces per room
- Retail: 0.5 spaces per 1,000 SF

These comparable TODs possess a similar scale, mix of land uses, and geographic characteristics as the Master Plan Project, and these developments intend to maximize all reasonable opportunity to share parking between uses.

Also discussed in the DEIR/DPIR, the Proponent will utilize shared parking concepts to reduce the actual number of parking spaces built and is committed to closely 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.

Comment 1.24

Phased Parking Strategy: *This strategy would include approximate timelines as deemed appropriate with phasing, threshold limits for monitoring to determine if*

parking should be increased at all, and scheduled check-ins with the BPDA and BTD over the course of the build-out with the express purpose of monitoring parking supply and demand.

Response

As stated previously in the response to Comment 1.23 above, the DEIR/DPIR described the Proponent's commitment to phase the construction of parking as needed to support each development phase or building and does not intend to over build parking. Further, as described in the draft PDA Documents (accessible via the web links provided in Appendix A), annual parking monitoring is anticipated to be a requirement of the master TAPA. The results of this monitoring and design of parking facilities will be subject to review by the BPDA during the future Development Review Process as the Project Site is built out.

Comment 1.25

To reiterate an urban design comment to come later in this document, loading must not occur on major streets, especially in the commercial spine of the project. Creating a completely new set of streets provides the opportunity to simultaneously create a solid network of alleys and internal access that should be used for loading.

Response

The service and loading diagram provided as Figure 2.2 and lobby diagram provided as Figure 2.3, demonstrate that loading occurs on secondary and tertiary streets avoiding the proposed commercial spine of Main Street and other major streets, such as the Park Road and Tomasello Drive. Future building design relative to the location of building entrances, ground floor porosity, and activation of key streets and open spaces will be subject to review and comment during the Development Review Process outlined in the draft PDA Documents (Appendix A).

Comment 1.26

Curbside Parking Strategy: *The City of Boston comment letter to the Suffolk Downs PNF requested that the Proponent create a strategy for curbside parking regulations. The Proponent responded that parking would be time limited, but not metered. This response was not sufficiently detailed to warrant being a full curbside parking strategy. The City requests that the Proponent create such a strategy including but not limited to the following elements: detailed segments of time limits and meters, TNC pick-up/drop-off zones, loading zones, and the feasibility of parking restricted areas.*

Response

The Proponent is further developing a curbside parking program, and will continue to work with the Public Improvement Commission, BTD and BPDA on this and other issues related to the management of on-site streets, with the intent that details will

be fleshed out in a TAPA entered into prior to commencement of the first phase of development within the Boston portion of the site are implemented, potentially taking into account the Proponent's experience in managing curbside parking within the initial Revere phase of development. Under the Development Review Process outlined in the PDA, additional information related to the Project's curbside parking program will be provided on the schematic roadway plans on a building by building basis.

It is currently expected that curbside parking at the Project Site will be managed in a manner similar to other recent multi-phase private development projects (e.g., Fan Pier), with curbside parking time-limited to facilitate turnover and ensure that curbside spaces are available for users of street-front retail and other uses, including use of open space. As the Project Site is built out this time-limited curbside spaces may also be metered. To manage the process, the Proponent intends to arrange for the establishment of a Suffolk Downs owner's association ("SDOA") to oversee management and administration over publicly-accessible open space areas, other components of the public realm, and streetscape improvements throughout the Suffolk Downs site, including the management of curbside parking. The SDOA, which will be funded from sources that could include contributions from owners of individual development parcels and collection of funds from any onsite meters, will oversee on-site personnel that will be tasked with monitoring and enforcing time limitations with respect to curbside parking. Time limitations and any future metered charges will be displayed on signage. It is also expected that the SDOA may contract with a third-party parking management provider that utilizes cloud-based parking management software, such as the "FastTrack" parking management system offered by Complus Data Innovations that is used in a number of locations throughout the United States. To support this kind of system, on-site personnel are expected to utilize handheld scanning devices (typically provided by the third-party parking vendor) that will allow parking monitors to efficiently track vehicles and respective parking durations, among other things.

Comment 1.27

Bike Lane Design: *In conjunction with BPDA Urban Design, it is recommended that bike lanes along roadways be revisited. The Proponent should replace standard bike lanes with separated bike lanes on the main commercial spine. Additionally, physical separation should be provided on all "primary" and "vehicle thoroughfare "streets. Specifically:*

- *The "Main Street" Commercial spine should have separated cycle tracks reduce the potential for biking and car conflicts on a busy street.*
- *Belle Isle Square should not use "shared" lanes but should have separated cycle tracks to enable connections to Suffolk Downs Station. Additionally, the connection from the site to Suffolk Downs Station should include a bike connection.*

- *An evaluation of other streets with bike lanes. This evaluation should assume that cycle tracks are included where any of the following criteria are met:*
    - *Daily vehicle counts are expected to be above 6,000 vehicles per day;*
    - *Includes curbside parking/loading (to avoid door zones);*
    - *Includes Parking garage access and/or building loading access on the street; and*
    - *Speeds are anticipated to be at or above 25 MPH.*

Response

Based on BPDA feedback, the Proponent will incorporate separated bike lanes (cycle tracks) on the proposed Main Street Corridor. The proposed design for on-site separated bike lanes/cycle tracks follows the MassDOT Separated Bike Lane Planning & Design Guide (2015), which states that separated bike lanes are generally not necessary on streets where operating speeds are below 25 mph and traffic volumes are below 6,000 vehicles per day. Only Tomasello Way, Park Road and the Main Street retail corridor would be expected to meet these volume or speed thresholds, and all have been shown in site design documents to include separated bike lanes.

The DEIR/DPIR filing showed three cross-sections of neighborhood streets with standard bike lanes adjacent to curbside parking. These are all low-volume (below 6,000 ADT), low-speed streets. All other streets had separated bike lanes (cycle tracks) or buffered bike lanes where no parking is planned. Standard bike lanes, where shown, are considered sufficient per MassDOT guidance given the anticipated vehicle volume and speeds. The busiest Project Site streets – Main Street, Tomasello Drive, and Park Road – have been designed to include separated bike lanes.

For Belle Isle Square, travel speeds are anticipated to be less than 25 mph and the area will be characterized by high amounts of pedestrian activity. Bicycle access will be provided by way of shared lane bicycle markings (or sharrows) along the one-way loop road passing through Belle Isle Square. This would be anticipated to achieve a low level of traffic stress for bicyclists.

The Proponent will continue to develop the design of bicycle access from Belle Isle Square to Suffolk Downs Station with BPDA and abutters to determine the best solution for multimodal connections. This area will include the construction of a cycle track or shared use path along Walley Street, , reconstruction of Suffolk Downs Station and station access areas, a Mobility MicroHUB, and MBTA bus dropoff area. These factors must be carefully coordinated.

Comment 1.28

Bicycle Parking: *The City would like to follow up on a scoping session comment that bicycle parking capacity be added to Blue Line stations. This parking should be bicycle cages to securely store bicycles for those commuting to work via bike and then the*

Blue Line coming from Suffolk Downs. Determining the parking capacity must be modeled to account for those within the site who may bike to the station from their residence and transfer to the Blue Line.

Additionally, secured covered bicycle storage should be provided within each building at ratios consistent with City policy. Changing rooms and shower facilities for bicycle commuters should be provided for employees in all commercial buildings.

Response

Since the Proponent does not own land surrounding the Suffolk Downs MBTA Blue Line Station, they will coordinate with the MBTA on the potential inclusion of a bike parking facility at this location. On-site, secure, covered bicycle parking, changing rooms and shower facilities will be provided within each proposed building at numbers required by BTD Off-Street Bicycle Parking Guidelines. The manner of accommodation for bike parking and shower/changing facilities can be discussed during design review for each stage of construction.

Bicycle parking, changing rooms, and shower facilities have been re-calculated based on Program B, per BTD Off-Street Bicycle Parking Guidelines. The findings are indicated in Tables 2-3 and 2-4 below.

Application of BTD's guidelines yields a total of 8,130 long-term and 2,226 short-term bicycle parking spaces within the Boston portions of the Project Site. This is an increase of 1,987 long-term and 573 short-term bicycle parking spaces, primarily the result of the greater number of residential units with the Proposed Development Program.

Application of BTD's guidelines yields a total of 23 shower and changing facilities required across all phases. These are entirely associated with commercial development. Again, specific bicycle and shower and changing facilities will be determined as each building advances through design review.

Table 2-3 Suffolk Downs Anticipated Bicycle Parking by Phase

Phase	**Anticipated Short-Term Bicycle Parking**					**Anticipated Long-Term Bicycle Parking**				
Land Use	Residential	Commercial	Hotel	Retail	Total	Residential	Commercial	Hotel	Retail	Total
Phase 1B	146	131	-	14	291	730	157	-	21	908
Phase 2B	260	59	27	13	358	1,299	70	32	19	1,421
Phase 3B	391	211	-	13	616	1,955	254	-	20	2,228
Phase 4B	401	284	-	-	685	2,006	341	-	-	2,347
Phase 5B	235	-	41	-	276	1,176	-	49	-	1,225
Total	**1,433**	**685**	**68**	**40**	**2,226**	**7,167**	**822**	**81**	**60**	**8,130**

Table 2-4 Suffolk Downs Anticipated Shower and Changing Facilities by Phase

Phase	**Anticipated Shower/Changing Facilities**				
Land Use	Residential	Commercial	Hotel	Retail	Total
Phase 1B	0	4	0	0	4
Phase 2B	0	2	0	0	2
Phase 3B	0	7	0	0	7
Phase 4B	0	10	0	0	10
Phase 5B	0	0	0	0	0
Total	**0**	**23**	**0**	**0**	**23**

Comment 1.29

Bike Share: *The Proponent should outline a strategy for determining Bluebikes station locations within the Site. As per BTD guidelines, projects over 100,000 sf need to include at least 1 Bluebikes station unless there is one nearby. Five stations with an average capacity of 15 bikes per station does not seem to be an appropriate number for nearly 16 million square feet of development. A Bluebikes station strategy should be constructed in tandem with placement of Mobility microHUBs (easing transfers by co-locating shuttle stops, bus stops, TNC pick-up/drop-off, bike share, care share, and EV charging at key destinations such as T stops, outside major office and residential buildings, and community centers).*

Response

Bike Share Stations

Bike share station frequency between a selection of stations within the Boston central business district were reviewed to develop a sense of spacing within the existing bike share system and to determine the appropriate number of bike share stations for the Project. Average spacing was determined to be approximately 307 yards. Using this, the Proponent proposes to install bike share stations at an approximate 300-yard frequency. This would yield seven bike share stations within the Boston portion of the Project Site and eleven overall within the site, in addition to two bike share stations at the MBTA transit stations (See Figure 1.14a). This is six more stations within the site than previously proposed. The final location of all bike share stations in Boston will be determined through close coordination with BTD/BPDA as each development phase is advanced.

Mobility MicroHUBs

The City of Boston has designated Suffolk Downs Station as the location of a Mobility MicroHUB. These are described in The Go Boston 2030 Vision and Action Plan as follows:

> *Using clearly-branded kiosks or nodes with real-time interactive information displays about transit schedules and shared vehicle*

> *availability, people can connect quickly between bus and train service, a Hubway station, secure bike parking, carshare vehicles, ridehailing pick-up spots, and electric vehicle charging stations at every microHUB. Coupled with free Wi-Fi and intuitive wayfinding, these nodes become reliable ways to start, continue, or complete a multimodal journey. Placemaking strategies including plazas or parklets, sidewalk amenities, information signs, shelters, and works of art at each of these hubs will make them places that are worth stopping in when you have the time or if you have to wait.*[1]

The Proponent is committed to installing a Mobility MicroHUB on-site adjacent to MBTA property at the northeasterly end of Walley Street. The MicroHUB site will be designed along with the reconstructed Suffolk Downs MBTA Station and will include elements described in the Go Boston policy. Specific design and details of the Mobility MicroHUB will be submitted as part of Phase 1B Development Review Process, as defined in the PDA.

Comment 1.30

East Boston Greenway: *The Proponent should work with the City to ensure that the site is well connected to the existing East Boston Greenway, which ends at Constitution Beach. This includes:*

- *Design and construct an extension from Constitution Beach to the site via Bennington Street and Walley Street.*
- *Design an extension of the East Boston Greenway to Belle Isle Marsh and Revere Beach.*

Response

As stated previously in the response to Comment 1.5 above, 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. On-site, the Proponent will design and construct a cycle track or shared use path from the southeastern corner of the Project Site to Bennington Street along Walley Street. This will provide for an effective crossing to the east side of Bennington Street to connect to the future East Boston Greenway Extension as it is conceptually envisioned.

[1] City of Boston. 2017. Go Boston 2030 Vision and Action Plan. P. 160. URL: https://www.boston.gov/sites/default/files/go_boston_2030_-_full_report_to_download.pdf.

Comment 1.31

New Mobility: *…the City would like the Proponent to consider making a strategy for how to manage TNCs in conjunction with a greater curbside management strategy and incentives to encourage shared rides. This strategy should discuss ideas of Mobility microHUBs, (as previously mentioned) and how to effectively manage TNCs on a project-by-project or district basis. For example, setting a policy for requiring a curbside transportation manager for any new buildings would be an appropriate element of a TNC strategy.*

Response

As stated previously in the response to Comment 1.26 above, the Proponent is further developing a curbside parking program, and will continue to work with the Public Improvement Commission, BTD and BPDA on this and other issues related to the management of on-site streets, with the intent that details will be fleshed out in a TAPA prior to construction of the first phase of development within the Boston portion of the Project Site, which may take into account the Proponent's experience in managing curbside parking and drop-off areas within the initial Revere phase of development, with the curbside parking program to be implemented through the SDOA. At this time it is intended that each building will have a drop off area next to its main entrance which can accommodate TNCs. In addition, each building will have a designated transportation manager who will manage the curbside drop-off for that specific building. Under the Development Review Process outlined in the PDA, additional information related to the Project's curbside parking strategy will be provided on the schematic roadway plans on a building by building basis. This strategy can also be incorporated into the applicable TAPA agreement.

Comment 1.32

TDM: *The City hopes for this project to have a robust TDM strategy that is logical for all stages of the project buildout. The suggestions include:*

- *The proponent should require tenants to supply subsidies on T passes, not simply encourage it.*
- *Assign an onsite TDM Coordinator to oversee all TDM programs for each building.*
- *Establish a rideshare program.*
- *Provide Bluebike facilities (see comments under "Bike Infrastructure" above).*
- *Disseminate information on alternate modes of transportation and development of transportation-related marketing and education materials.*
- *Develop and distribute information pertaining to pedestrian and bicycle access to and from the project site.*
- *Provide preferential carpool and vanpool parking.*

- *Sponsor vanpools and subsidized expenses.*
- *Provide promotional events for transit riders, bicyclists and pedestrians.*
- *Designate locations for pick-up and drop-off of TNCs and shuttles that are woven into a cohesive strategy as mentioned in the New Mobility section above. Innovative solutions such as geofencing individual buildings, providing incentives for shared rides, should be explored and reported on.*
- *Establish a strategy for car sharing in individual parking areas on the project site. This would include services such as Zipcar or others that develop in the coming years.*
- *Quantitatively analyze the feasibility of providing unbundled parking at each proposed building.*
- *Establish a centralized TMA specifically for this site. It should then be a program that can be expanded to include other developments in East Boston. The Proponent should partner with A Better City to establish a service similar to those in other neighborhoods in Boston.*

Response

Require tenants to supply subsidies on T passes

The Proponent supports the practice of providing subsidies for T passes, but cannot obligate future tenants to provide them. Even in the absence of a requirement to do so, many Boston companies provide subsidized T passes as part of their employment benefits. The provision of subsidies will be strongly encouraged for all tenants.

Assign an onsite TDM Coordinator

This measure was proposed as part of the DEIR/DPR and will be maintained in the TDM program.

Establish a rideshare program

This measure was proposed as part of the DEIR/DPIR and will be maintained in the TDM program.

Provide Bluebike facilities

This measure was proposed as part of the DEIR/DPIR and will be maintained in the TDM program.

Disseminate information on alternate modes of transportation, including pedestrian and bicycle access

This measure was proposed as part of the DEIR/DPIR and will be maintained in the TDM program.

Provide preferential carpool and vanpool parking

The Proponent agrees with this suggestion and this measure will be added to the TDM program.

Sponsor vanpools and subsidized expenses

The Proponent supports vanpools and subsidized expenses. However, similar to the above discussion of transit subsidies, the Proponent cannot obligate future tenants to provide them. This practice will be strongly encouraged for all tenants.

Provide promotional events for transit riders, bicyclists and pedestrians

The Proponent agrees with this suggestion and this measure will be added to the TDM program.

Designate locations for pick-up and drop-off of TNCs and shuttles

Each building will have a curbside drop-off location for TNCs as well as other vehicles such as taxis. In addition, all on-site shuttles will have designated stops that will allow the shuttles to pull off the driving lane and be able to pick-up and drop-off passengers without blocking the vehicle lane. Specific locations of these locations will be determined as each building and their associated roads go through design review with the City of Boston.

Establish a strategy for car sharing

This measure was proposed as part of the DEIR/DPIR and will be maintained in the TDM program.

Quantitatively analyze the feasibility of providing unbundled parking

The Proponent will provide unbundled parking for all rental buildings. In addition, parking for condo buildings are typically sold separately from the units.

Establish a centralized TMA for the Project Site

The Proponent will explore the establishment of a TMA specifically for its site that will incorporate its on-site and off-site shuttles. Once established, the Proponent will explore opportunities to expand to other developments based upon demand and locational proximity.

Comment 1.33

Resiliency: *The proponent should evaluate the cost, feasibility and effectiveness of this proposed improvement further and, if acceptable to the Cities of Boston and Revere and the Commonwealth of Massachusetts, build it as part of necessary mitigation. If this berm is not acceptable, then the proponent should evaluate the cost and feasibility of an alternative strategy acceptable to the public agencies to provide an equivalent protection barrier for the Blue Line and implement such strategy.*

Response

The Proponent has committed to conducting a conceptual feasibility study for a regional flood protection barrier along Bennington Street, which will include high-level estimated costs and a preliminary implementation strategy.

The Proponent has and will continue to work with all government agencies involved in resiliency planning for adjoining neighborhoods in East Boston and Revere. However, the cost of implementing this regional barrier solution is beyond the means of the Suffolk Downs project. The construction of any regional barrier solution should be taken on by the appropriate government agencies given the scale of the project and the use of city and state land for its location.

Comment 1.34

Bennington Street/Belle Isle Marsh/Sales Creek Infrastructure: *The proponent should evaluate the adequacy and condition of the Belle Isle March/Sales Creek Infrastructure which convey tidal and stormwater from the development to the Belle Isle Inlet, particularly in light of anticipated sea level rise. If insufficient, this could affect the viability of Bennington Street in future storms and flooding. The cost, extent and feasibility of needed upgrades should be assessed.*

Response

The adequacy and condition of the Belle Isle Marsh/Sales Creek Infrastructure was investigated as part of the Resiliency Study and comprehensive modeling provided in the DEIR/DPIR submission. In summary, the following infrastructure was identified as sufficient for the hydraulic capacity of Sales Creek (for the storms investigated during the study) and are suitable for reuse based on field investigation and structural evaluation:

- The twin culverts under Tomasello Way;
- The two sets of twin culverts below the Suffolk Downs track;
- The MBTA culvert; and
- The Bennington Street culvert.

The DEIR/DPIR identified the need to upgrade the flood protection infrastructure to handle future climate impact projections – with or without the Project. The Proponent has confirmed that the outlet culvert for the Alfred H. Long Pumping

Station underneath Bennington Street has sufficient capacity for the proposed pump upgrades.

All infrastructure hydraulically related to the resiliency and flood protection of the Project was assessed in detail in the DEIR/DPIR (Chapter 8, *Climate Change Resiliency*).

Letter 2: BPDA Planning and Urban Design

Comment 2.1

Land Use

- *Land use must include civic uses*
    - *To be clearly identified in use tables and calculations*
    - *To be clearly communicated in diagrams and 3D models where known civic programs are integrated with buildings*
- *Land use tables must delimit Boston and Revere*

Response

Refer to response to Comment RSI.3

Comment 2.2

Area Calculations

- *Provide parcelization diagram*
- *Area calculations including parcel area, gross square footage, ground floor footprint and FAR must be provided per building*
- *Area calculations must delimit Boston and Revere*

Response

Refer to response to Comment RSI.4

Comment 2.3

Population Calculations

- *The Proponent should continue to work with BPDA to determine an appropriate average household size estimate for transportation modeling and municipal impact purposes.*

Response

Refer to response to Comment RSI.5

Comment 2.4

Where possible, consolidate vehicular entry sequence from Route 1A. Informed by detailed comments submitted by transportation staff, the proponent should continue to refine this intersection.

Response

Based on recent discussions with MassDOT and the larger Transportation Working Group, the Route 1A superstreet concept is no longer the preferred alternative. As such, the geometry of the intersection of Route 1A and Tomasello Drive, which serves as the primary access point off of Route 1A is being redesigned. MassDOT has provided the Proponent with guidance to not include mitigation that will add capacity to Route 1A southbound in order to control the amount of traffic entering the tunnels. As discussed in response to Comment 1.4, the Proponent will continue to work with the Transportation Working Group to establish the Preferred Alternative for Route 1A corridor improvements.

Comment 2.5

The interior street running from the existing cul-de-sac to Belle Isle Square should be reconfigured to have an outlet on Tomasello Way.

Response

Figure 1.15 illustrates the re-designed Route 1A entrance that is more urban in nature compared to the "jug-handle" option. This design alternative enables an intersection closer to Route 1A; however, due to limited access for the buildings right against Route 1A, there is still a need for a cul-de-sec.

Comment 2.6

In combination with the above, study combining Blocks 1 and 5 into a single gateway building with a podium and tower. Building should be designed with multiple fronts, as it will be visible from Route 1A from both the north and south, and as a terminus to the secondary/tertiary street running from Belle Isle Square and Suffolk Downs Station.

Response

As shown in Figures 1.11a and 1.11b, the blocks have been reconfigured based on further coordination with the BPDA and community input.

Comment 2.7

Study shifting the secondary/tertiary drive, which currently ends in a cul-de-sac at blocks 1 and 5 to create more balanced building sizes on either side, particularly to the west as it approaches Route 1A. It may be that an imbalance in building size on either side of the street is desirable, but further study is warranted

Response

As shown on the Rt 1A entrance plan, Figure 1.15, the secondary street parallel to Waldemar Ave has been shifted and the length of cul-de-sac has been reduced with a connection at a roundabout on the entrance road (which has also been shifted slightly. This provides a plan where the buildings on either side of the new road are more similar in plan. The buildings on the south side adjacent to the Orient Heights neighborhood will be lower in scale in keeping with the heights in the agreed zoning revision, while the buildings to the north flanking the entrance drive will be taller in keeping with their prominence in creating an "urban entrance" statement at Rt 1A.

Comment 2.8

Though Tomasello Way will function as a major street, the proposed Primary Drive should also sit atop the street hierarchy. The current configuration forces a right turn off Tomasello Way onto Primary Drive. Eastbound vehicular movements on Primary Drive should more directly flow off Tomasello Way toward Main Street and the central open space. Westbound vehicular movements which continue on Tomasello should be managed through a perpendicular intersection with a left turn.

Response

As shown in Figure 2.1, based on the BPDA comments the view corridor at the intersection of Tomasello Drive and Parkway has been widened to create a sense of arrival and a landmark

Comment 2.9

To underscore the importance of Primary Drive, explore a boulevard median for a section of the Primary Drive from the branch at Tomasello Way to the intersection with Main Street and the Central Common.

Response

Adding a median to the primary drive would both increase the amount of impervious surface and decrease the amount of usable outdoor space. A shift akin to this would create a fundamental disconnect within the open space network currently reflected in the plan. As an alternative the proponent proposes to create the experience of the boulevard while still limiting the vehicular movement to one side.

Comment 2.10

A boulevard treatment would also provide some additional benefits. First, it would introduce a wayfinding element to the Main Street and to the Central Common. Second, it shifts a strip of green to the median and signals a slowing of the traffic with the added opportunity for an alley of trees on both the east and west bound sides of the Primary Drive. The remainder of the proposed open space that was adjacent to Blocks 26, 28, and 30 can be reallocated to create larger, more usable open spaces (such as the open space near Block 35 and between Blocks 36 and 37). This largely unusable tail of open space can be reimagined as buildings fronting on the boulevard (expanding Blocks 26, 28, and 30). With the additional square footage, Block 30 can then be split to extend the street grid to the east.

Response

The Proponent has studied this alternative and identified a more feasible and functional alternative in which the auto carriageway remains located at the south of the right-of-way, providing frontage for the adjacent properties, while cycle track and pedestrian path are now located further to the north, across a tree-planted central median formed by the rainwater retention swale. The previously proposed open space to the north has been retained. This arrangement provides the sense of median (in form of the rain garden between autos and cyclists) while bringing denser planting closer to the road and providing a park-like setting for the cycle track and community path.

In addition, as more fully explained in response to Comment 2.19, the open space will be developed as an active "gateway park" with a dog park and paved and striped sport courts. A literal boulevard with median planting is not practical, and that the proposed arrangement provides the desired wayfinding element, alley of trees, and better use and access to open space, while improving the experience of all users. This alternative option additionally satisfies requests made by Boston Parks and Recreation Department to increase Active Recreation space. The suggested boulevard option would not allow for addition of this desired space.

Comment 2.11

While it is clear certain streets are functioning primarily for loading and service (e.g., the tertiary street between blocks 12-15 and blocks 16-20), the location of loading docks and pedestrian building entrances should be defined at a master plan level. The commercial area at the center of the redevelopment, in particular, should locate loading docks and parking entries so as not to interfere with the retail character of main street, the proposed active linear corridor, or the green fingers extending to the Central Common. A strategy for building entrances should also be defined. Building porosity is desirable, and it is expected that buildings will be accessed from multiple sides (i.e., from the Active Linear Corridor and the adjacent streets), though ostensibly with a primary entrance.

Response

The service and loading diagram provided as Figure 2.2 and lobby diagram provided as Figure 2.3, demonstrate that loading occurs on secondary and tertiary streets avoiding the proposed commercial spine of Main Street and other major streets, such as Tomasello Drive. Future building design relative to the location of building entrances, ground floor porosity, and activation of key streets and open spaces will be subject to review and comment during the Development Review Process outlined in the draft PDA Documents (accessible via the web links provided in Appendix A).

Comment 2.12

Echoing comments provided by the Transportation staff, a comprehensive parking strategy should continue to be refined. Location of entrances/egress and lower parking ratios will result in more varied and high quality architecture.

Response

Parking plans will be subject to future review and approval by the BPDA during the Development Review Process outlined in the draft PDA Documents (Appendix A). This Development Review will be guided by the results of the annual traffic and parking monitoring data discussed in the responses to Comments 1.23, 1.24, and 1.26.

Comment 2.13

Belle Isle Square should prioritize pedestrians and cyclists, but further study is necessary to explore how bringing buses directly to or as close as possible to the Suffolk Downs MBTA Station can be achieved. The design of the Square and to the access point where Suffolk Downs, the T, and Waldemar Avenue intersect is also an important locus point for continued study.

Response

The Proponent is actively working with the MBTA and MassDOT on studying bus capacity impacts and evaluating bus service enhancements near and to the Project Site. Refer to response to Comment 1.8 for additional information.

Based on the agreed bus connections, Belle Isle Square will accommodate bus connections to the Suffolk Downs MBTA station. Active sidewalk-facing retail uses will continue to front the square. Design will reach beyond the confines of the Master Plan Project site to include consideration of the intersection of Waldemar Avenue with Walley Street. The Proponent will continue to develop the design of bicycle access from Belle Isle Square to Suffolk Downs Station with BPDA and abutters to determine the best solution for multimodal connections. This area will include the construction of a cycle track or shared use path along Walley Street, , reconstruction of Suffolk Downs Station and station access areas, a Mobility MicroHUB, and MBTA bus dropoff area. These factors must be carefully coordinated.

Comment 2.14

Ultimately, modifications to the current Belle Isle Square design may be warranted. The Proponent should prepare detailed cross sections and 3D diagrams as the design evolves. As previously mentioned, alterations to Phase I buildings to produce transit benefits would be welcome. BPDA staff will continue to collaborate with the Proponent, the State, and the abutters just beyond the property line along Waldemar Avenue to ensure that this important access point reflects the best possible long-term scenario for the project and the neighborhood.

Response

As discussed in response to Comment 2.13, the Proponent is actively working with the MBTA and MassDOT on evaluating enhancements in the Belle Isle Square vicinity. The Proponent welcomes collaboration with Commonwealth and city agencies to create a vibrant, active, convenient transit connection at this very important entrance point to both the Master Plan Project Site and the Orient Heights neighborhood. Updated cross-sections and 3-D diagrams will be provided as part of the future Design Review process for Phase 1B.

Comment 2.15

As a general point, BPDA staff reiterates a comment from the Scoping Determination to include more 3D diagrams and to use technologies to help explain or illustrate spatial concepts. The heavy reliance on plan and section diagrams, while useful, does not provide the same utility that 3D models and diagrams can convey.

Response

During the course of the review process, the Proponent has presented multiple perspectives of the Project Site, and at the request of the city has developed a scale model of the site which has been presented to urban design staff and the community and updated for changes in height based on community input. In addition, the Proponent has also created an extensive series of Master Plan Level, Neighborhood Level and Building Level Figures to help establish spatial concepts for the Site. Additional design review will occur through the Development Review Process outlined within the draft PDA Documents (Appendix A).

Comment 2.16

An Orient Heights neighborhood park is a welcome amenity for the existing neighborhood and introduces a nice scale of open space as a side door to Suffolk Downs. As one bookend to the active linear corridor and located at the same grade as Waldemar Avenue, the neighborhood park will provide an open space bridge into the larger redevelopment site. Though accessible for pedestrians, bicycle accommodations should also be provided to provide an additional entry point for cyclists into Suffolk Downs.

Response

A new cycle track segment will be added that connects Waldemar Avenue and this new Waldemar Avenue Park to the on-site cycle track network. In addition, a welcoming pedestrian pathway will also extend from Waldemar Avenue into the Suffolk Downs open space system. Appropriate short-term bike parking facilities will be included as part of the new Waldemar Avenue Park. Additionally, the Proponent will fund design and construction of a shared path or cycle track from the southeast corner of the Project Site along Walley Street to Bennington Street.

Comment 2.17

The Proponent should explore an additional pocket park or small open space on Waldemar Avenue between the single-family homes and Block 4. Though shifting some of the open space may introduce grade change at that location, locating an open space closer to the Boston Housing Authority's ("BHA") Orient Heights Redevelopment would provide a better transition in building height from multifamily to single-family in the east-west direction, and would provide better access to residents who today have limited access to open space.

Response

The Master Plan Project includes a park connection with open space between the BHA's Orient Heights Development and the Project Site. This is specifically located to align with the BHA's open space that is shown on Figure 2.4. A small open space nearby the school is proposed. The Proponent has added a vegetated buffer between the multi-family housing and the townhomes to provide visual amenity and a better transition between building types.

Comment 2.18

Regardless, a pedestrian connection / urban staircase closer to Orient Heights between the single-family residences and Block 4 should be explored as an alternate mechanism to provide a transition in building scale and "pause" in the street, inviting residents further up the hill into Suffolk Downs and the open spaces therein.

Response

As shown in Figure 2.5, the Proponent has added an urban wild landscape buffer area between the single-family residences and Block 4. Beyond Block 4 is the proposed pedestrian connection and urban staircase which aligns with the BHA's Orient Heights redevelopment. Additionally, the new Waldemar Avenue park also provide a pedestrian and bicycle connection from Waldemar Avenue/Orient Heights neighborhood to the Project Site and its 40-acre open space system. Both proposed pedestrian connections will be ADA accessible connections.

Comment 2.19

Related to the reconfiguration of Primary Drive and associated median, open space adjacent to blocks 26, 28 and 30 can be reallocated to create larger, more usable open spaces (such as the open space near Block 35 between Blocks 36 and 37).

Response

The Proponent has studied the space adjacent to blocks 26, 28, and 30 (previously indicated as 17, 19, and 20) and proposes improvements as shown in Figure 2.6. At the narrow end of the Parkway the open space is to be developed as a Dog Park with a tree shaded pedestrian sidewalk adjacent to these three buildings; the rain capture space forms a generous median between this park usage and the more active community path and cycle track. At the wider end of the Parkway the cycle track and community path are moved more toward the center and the right of way is widened to allow the retention swale to be located between these and the roadway. Working with Boston Parks and Recreation Department, delineated active court sport facilities will be developed in the open space with planting adjacent to both sides of the path and cycle track. This development creates an active recreational "gateway park" for the Master Plan Project.

Comment 2.20

A residual effect might be the combination of Blocks 36 and 56 into a single, more regularly shaped / sized parcel, which could still support civic use at the ground floor. This configuration could be centered between the Primary Drive and the edge of Block 37 to the north to allow a view of the open space and the pond from the Primary Drive, creating a large aperture between it and Block 37.

Response

After study and analysis of the suggested option, the Proponent has chosen deliberately not to combine blocks 36 and 56. In the Proponent's view the broad sweep of the open space from block 30 past 36 and on to 37 and 38 is an important edge to the open space, while the opposite curve along blocks 16 through 19 opens the space to Belle Isle square. Block 56 will be a signature building seen along the Parkway and identifying the southern end of the Commercial Street with its landmark presence. This will be an important element in wayfinding at the confluence of Belle Isle Square, the central park, the Parkway and the Commercial Street. The Proponent has deliberately proposed smaller buildings around the 'horse-shoe' pond to respect the wetland edge and its buffer and to allow for a more gradual slope as entry into the park from the urban edge.

Letter 3: BPDA Environment & Climate Change Planning

Comment 3.1

***Shadow**: The Proponent has stated that Table 9-2 (contained in the Draft Project Impact Report) shows the solar azimuth and altitude data and is reflective of a latitude of 42.358º and a longitude of 71.06º. However, the solar azimuth and altitude data for December 21st is not accurate, please review and update the shadow images.*

Response

The shadow study conducted for the DPIR utilized the correct azimuth and altitude data but was incorrectly reported in Table 9-2. An updated table is provided below:

Table 9-2 Solar Azimuth and Altitude Data

Date	Time	Azimuth *	Altitude **
March 21 EDT	9:00 AM	112.7	23.4
March 21 EDT	12:00 PM	161.2	46.2
March 21 EDT	3:00 PM	223.3	39.1
June 21 EDT	9:00 AM	93.5	39.9
June 21 EDT	12:00 PM	149.6	68.8
June 21 EDT	3:00 PM	246.3	56.5
June 21 EDT	6:00 PM	280.7	23.8
September 21 EDT	9:00 AM	115.4	26.0
September 21 EDT	12:00 PM	166.2	47.4
September 21 EDT	3:00 PM	227.2	37.3
September 21 EDT	6:00 PM	264.0	7.2
December 21 EST	9:00 AM	142.0	14.3
December 21 EST	12:00 PM	184.4	24.1
December 21 EST	3:00 PM	225.0	10.0

Comment 3.2

***Wind**: It appears that a qualitative "wind tunnel study" of potential wind conditions was conducted and not the Boston Planning & Development Agency (BPDA) requested "wind tunnel analysis". Thus, the Proponent shall be required to conduct (as previously requested) a quantitative (wind tunnel) analysis of pedestrian level winds for the following configurations:*

Configuration A-Existing: Existing site conditions with existing surrounding buildings and those under construction, to establish a baseline condition.

Configuration B-Proposed Phase 1 Project: Proposed Phase 1 Project with existing surrounding buildings (as per the wind sensor plan approved by the BPDA);

Configuration C-Proposed Phase 1 Project and Master Plan Project: The Proposed Phase 1 Project with surrounding buildings and (Boston and Revere) Master Plan Project buildings.

Configuration D (Optional)-The Proposed Phase 1 Project with surrounding buildings, (Boston and Revere) Master Plan Project buildings and BPDA Board approved projects within 1,500-2,000 feet of the Proposed Project site.

(With the submission of each subsequent phase, either a qualitative or quantitative analysis shall be conducted- a determination shall be based on phase building details ((in compliance with the BPDA Design Review Guidelines)) and in consultation with BPDA staff.)

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

Response

The Proponent has conducted a comprehensive desktop wind study for the Master Plan Project as well as a quantitative wind tunnel test for a portion of Phase 1B. The results of the study indicated that with appropriate mitigation, the Master Plan Project is not anticipated to result in any new unacceptable or unsafe wind conditions in or around the Project Site.

As design progresses for each phase of the Master Plan Project, mitigation measures, such as shaping buildings, incorporating setbacks and/or detailed architectural façade elements and landscape interventions will improve conditions. Future wind conditions will be evaluated, as applicable, as part of the Development Review Process articulated in the draft PDA Documents (accessible via the web links provided in Appendix A).

Comment 3.3

Sustainability Vision: *Suffolk Downs, as the single largest development project in Boston's history, has a unique responsibility and opportunity to address our changing climate and environmental challenges. The development team should establish a leadership sustainability vision and brand for the redevelopment that envisions a thriving and vibrant new community that is climate ready and carbon free.*

Innovations in planning, engineering, design, and construction, which are already leading characteristics of the Suffolk Downs, should be expanded upon and elevated. The development team should explore new strategies and products for dramatically reducing carbon emissions, engaging residents and occupants in the ongoing planning and design, for monitoring of energy and water use, waste generation, emissions by travel modes, and overall environmental stewardship.

Response

Since the DEIR/DPIR filing, to further support the Commonwealth's goals of reducing carbon emissions and Boston's commitment to carbon neutrality by 2050, as well as energy efficiency goals applicable in Revere, the Proponent has made significant commitments to incorporating energy efficiency strategies into building design, where feasible and reasonable. The Project will achieve reductions in energy use and GHG emissions that considerably exceed minimum requirements by adhering to increased energy and emissions reduction targets/goals, facilitating the incorporation of on-site renewable energy, and LEED certification commitments. The stationary source GHG emissions mitigation measures proposed as part of the MEPA Response to Request for Additional Information ("RRAI") dated November 30, 2018 are summarized in Table 2-5 below.

Table 2-5 Proposed Stationary Source GHG Emissions Mitigation Measures

Measure	Responsible Party	Permitting Requirement	Estimated Cost	Implementation Schedule/ Threshold
See Transportation Measures above for Mobile Source GHG Mitigation.				
Prepare schematic designs and cost estimates of a 200,000 square foot multi-residential building for both a preferred/planned design and Passive House design.	Proponent	None	TBD	Phase 1R Design
All townhouses (22 total) will be Passive House- and/or E+ (Energy Positive)-equivalent.	Proponent	None	TBD	Phase 1B and 2B Construction
Construct one (1) Passive House Demonstration Project of a minimum 50,000 square foot building.	Proponent	None	TBD	Phase 2B Construction
All single-family homes along Waldemar Avenue (12 total) will be Passive House- and/or E+-equivalent.	Proponent	None	TBD	By Phase 3B Construction
Construct buildings to achieve the following energy savings as compared to base energy code: • 5% of Buildings greater than 50% • 35% of Buildings 30%-50% • 55% of Buildings 18%-30% 5% of Buildings 10%-18%	Proponent	None	TBD	Phase 1-5 Construction
Construct all buildings to be Solar Ready.	Proponent	None	TBD	Phase 1-5 Construction
Install a minimum of 2 MW of solar PV on building rooftops	Proponent or 3rd-party provider	None	TBD	Phase 1-5 Construction
Design all buildings to meet LEED certifiable standards as follows: • Minimum of 5% LEED Platinum • Minimum of 75% LEED Gold • Maximum of 20% LEED Silver	Proponent or Building Owner	None	TBD	Phase 1-5 Construction
Designate preferred parking spaces for alternative-fuel vehicles.	Proponent	None	TBD	All Phases

Comment 3.4

Passive House & Energy Positive (E+) Buildings: *Please define and provide the performance characteristics of both the "traditional" and "passive house" design options including LEED characteristics that will be consistent in both options.*

Response

The key design assumptions included in the proposed and Passive House mid-rise multi-family residential building are summarized in Table 2-5 below.

Table 2-5 Proposed Mid-Rise Multi-Family Residential and Passive House Residential Design Assumptions

ARCHITECTURAL			
ANALYSIS INPUT PARAMETER	**CASE 1:Baseline ASHRAE 90.1-2013**	**PROPOSED RESIDENTIAL 1 Mid-Rise**	**PASSIVE HAUS RESIDENTIAL**
Roof Assembly	U-0.032 (R-30)	Same as Baseline	R-60
Wall Assembly-Opaque	U-0.055 (R-18)	Same as Baseline 55% wall area	U-0.03 (R-33) 78% wall area
Wall Assembly-Spandrel/ Shadow Box	U-0.055 (R-18)	U-0.200 0% wall area	n/a 0% wall area
Vertical Fenestration Area (% of Wall)	40%	0.45	0.22
Vertical Glazing U-Factor	U-0.42 (fixed) U-0.50 (operable)	fixed: 0.35 operable: 0.4	fixed: U-0.14 (0.13 COG)
Vertical Glazing SHGC	0.4	0.3	0.5 for South, 0.4 for other orientations
Air Infiltration Rate	0.4 cfm/ sqft façade	0.4 cfm/ sqft façade	0.2 cfm/ sqft façade
ELECTRICAL			
ANALYSIS INPUT PARAMETER	**CASE 1:Baseline ASHRAE 90.1-2013**	**PROPOSED RESIDENTIAL 1 Mid-Rise**	**PASSIVE HAUS RESIDENTIAL**
Interior Lighting Power Density	0.51 W/ sf (ASHRAE 90.1-2013 Building Area Method for Multifamily, excludes dwelling units)	0.46 W/ sf (all -LED lighting design)	0.46 W/ sf
HVAC			
ANALYSIS INPUT PARAMETER	**CASE 1:Baseline ASHRAE 90.1-2013**	**PROPOSED RESIDENTIAL 1 Mid-Rise**	**PASSIVE HAUS RESIDENTIAL**
Primary HVAC Type	System Type 1 –Packaged Terminal Air Conditioner (PTAC)	Dedicated outside air unit with energy recovery serving heat pumps-	Dedicated outside air unit with energy recovery with heat pumps (ERV)- MERV 8 filtration minimum
Fan System Operation	Continious	Continuous	Continuous
Outdoor Air Design Min Ventilation (cfm)	Same as Design	TBD	0.3 ACH/h
Design Airflow Rates (cfm)	n/a (served by PTAC)	n/a (served by heat pumps)	n/a (served by heat pumps)
Exhaust Air Energy Recovery	Not required	Total energy recovery wheel	Balanced ventilation-Total energy recovery wheel
Primary Cooling Source	Direct Expansion	Water source heat pumps	air source heat pumps
CHW Loop Supply Temp / Delta-T	n/a	n/a	n/a
CHW Loop Temp Reset Parameters	n/a	n/a	n/a
Primary Heating Source	Gas-fired hot water boilers	Water source heat pumps connected to condensing boilers	air source heat pumps
HW Loop Supply Temp/ Delta-T	n/a	n/a	n/a
PLUMBING			
ANALYSIS INPUT PARAMETER	**CASE 1:Baseline ASHRAE 90.1-2013**	**PROPOSED RESIDENTIAL 1 Mid-Rise**	**PASSIVE HAUS RESIDENTIAL**
Service Hot Water Type	Gas storage water heater	Condensing hot water heater	Electric heat pump water heater
UTILITY RATES			
ANALYSIS INPUT PARAMETER	**RESIDENTIAL**		
Electricity	0.1988 $/ kWh (MA EIA Jul 2017)		
Natural Gas	1.543 $/ therm (MA EIA Jul 2017)		

Comment 3.5

Passive House & Energy Positive (E+) Buildings: *The City of Boston is committed to achieving carbon neutrality by 2050 and requests all new single family and*

townhome buildings be net energy positive (E+) and that the demonstration Multifamily Residential project target net energy positive (E+) performance integrating building energy efficiency and onsite solar PV.

Response

The RRAI increased commitments to energy efficiency and GHG emissions reductions, including all single-family homes (12 in total) and all townhomes (22 in total) will be Passive House and/or E+ (energy Positive) equivalent. It additionally included a commitment to construct one (1) Passive House (or equivalent) demonstration project of a minimum 50,000 square foot multi-family residential building, which has now been moved up to Phase 1B from Phase 2B and a commitment to install a minimum of 2MW of solar on-site. Furthermore, all buildings throughout the development will be solar-ready.

Comment 3.6

Energy Profiles: *The building type specific energy models included in the DPIR indicate significant opportunity for better building performance; would it be useful for those models be revised to reflect the proposed Energy Profiles? The minimum thresholds for the proposed Energy Profiles should better reflect those opportunities as follows: exceed 10% buildings = >50% savings, 35% buildings = 35% to 50% savings, 50%buildings = 25% to 35% savings, and 5% buildings = 15% to 25% savings.*

Response

Since the DEIR/DPIR filing, the energy usage and stationary source GHG emissions assessment has been updated to reflect the Proponent's increased GHG emission mitigation commitments of the RRAI for both Program A and Program B (for comparison purposes). As presented in Table 7-18 of the DEIR/DPIR, Program A (without parking) demonstrated a 19.4 percent energy use savings and 17.5 percent GHG emissions reduction compared to the Base Case. For the Program B, the currently proposed development program, the commitments made in the RRAI result in energy reduction of 28.7 percent, an increase of six percent compared to Program A and GHG emissions reduction of 28.5 percent, an increase of six percent compared to Program A. This demonstrates the Proponent's support of Boston's commitment to carbon neutrality by 2050.

Comment 3.7

Energy Profiles: *Please define "current code"? Our read is that Energy Profiles imply modeled building energy saving (not cost) based on comparison to the Massachusetts Building Energy Code applicable at the time of construction permitting and that this does NOT include energy offset by rooftop, building integrated, or onsite renewable energy sources.*

Response

Current code refers to the current Massachusetts energy code which references ASHRAE 90.1-2013 for the performance-based pathway.

Comment 3.8

Energy Profiles: *Please clarify how the percentages of "Buildings" will be measured; our preference is by square feet of building?*

Response

The Proponent's commitment is on the number of buildings, not the square footage.

Comment 3.9

Energy Profiles: *Given the long duration of development and build out do you have ideas for ensuring all of the minimum thresholds will be exceeded prior to completion?*

Response

The Proponent's increase in commitments to energy efficiency and stationary source GHG emissions reductions, as demonstrated in the MEPA RRAI is based on current understanding of the building sector, Boston's market, available incentives and technologies. It is recognized that over the course of the project, technology, incentives, economic cycles and the State energy code will change, and the Master Plan Project will respond to those changes accordingly. Under Program B, the Proponent has committed to at least a 23 percent energy reduction at the low end and a possible 37.5 percent reduction at the high end of their commitments which anticipates future efficiency.

Comment 3.10

Solar PV: *In addition to all buildings being solar ready, all building should be solar optimized including building orientation, maximizing roof space for solar panels, minimizing and managing the location of rooftop mechanical equipment and penthouse structures, and integration of solar panels in site and building shading and canopy elements.*

Response

As individual building designs progress, the massing of the tower elements will be studied for optimal orientation considering program, space efficiency, passive design, views and daylight. The Proponent has committed to all buildings being solar ready, meaning roof space will be planned so that a future PV system can more easily being installed, conduit routing is installed, and breaker space is provided in

the electrical switchgear. Roof plans will be submitted as part of future design reviews of individual buildings indicating green roof and solar PV areas to meet the Proponent's commitments to 20% green roof area and 2MW solar PV.

Comment 3.11

Solar PV: *Optimally, all new building should include solar PV concurrent with construction completion. Can the 2 MW of solar PV commitment include solar PV installations with each building and solar PV installation targets or commitments by phase?*

Response

The Proponent has committed to a minimum of 2MW of solar photovoltaic systems on site and will install the systems in the most cost-effective manner to optimize its feasibility. Roof plans will be submitted as part of future design reviews for individual buildings indicating green roof and solar PV areas to meet the Proponent's commitments to 20% green roof area and 2MW solar PV.

Comment 3.12

LEED: *Thank you for the LEED outcome commitments! Can you clarify how the percentages of "Buildings" will be measured; our preference is by square feet of building?*

Response

See response to Comment 3.8.

Comment 3.13

LEED: *As the planning shifts to individual building design, the developer is required to provide a building specific Article 37 Green Building - Initial Filing at the pre-schematic design phase which should be prior to or concurrent with the first building specific BPDA urban design submission.*

Response

The Proponent is committed to following the requirements in Article 37 as each individual building design progresses, which will be demonstrated through the future Design Review Process established by the PDA.

Comment 3.14

LEED: *Given the long duration of development and the regular evolution of the LEED rating system each building should utilize the most current LEED rating system available at the time of the Article 37 Green Building - Initial Filing.*

Response

The Proponent recognizes that the LEED rating system evolves over time and will utilize the applicable rating system that is available to the Project at the time of its design.

Comment 3.15

LEED: *The development team has demonstrated a commitment to holistic sustainability and integrative project planning; can the team translate this commitment to achieving the LEED Integrative Process credit for all of the buildings?*

Response

The Proponent has recognized the value of an integrative design process to achieve a sustainable building by indicating the integrative process credit (ID c1) as a 'yes' in each of the building typology LEED checklists submitted in the DPIR/DEIR.

Comment 3.16

LEED: *Thank you for including the LEED ND analysis and Checklist. The project team should identify strategies and credits for achieving LEED ND Gold.*

Response

As part of the 2018 RRAI mitigation commitments, the Proponent has increased their commitment to LEED certifiable buildings to commit to 5 percent of buildings meeting LEED Platinum, 75 percent LEED Gold and 20 percent LEED Silver. An updated LEED-ND checklist is provided in Figure 1.17a, which demonstrates an additional eight (8) points in the 'yes' category. Given the preliminary design status of the Master Plan Project, there remain enough 'maybe' points indicated to reach a Gold level of certification.

Comment 3.17

LEED: *The Proposed Green Building Mitigation plan commits the majority of buildings to achieving LEED Gold; can the building typology LEED Checklist should be updated to more fully reflect those commitments?*

Response

The preliminary LEED checklists submitted in the DPIR/DEIR reflect LEED Silver for the Office, Residential, Hotel and Retail typologies. Recognizing the 2018 RRAI commitments increased the majority of buildings to LEED-Gold certifiable, two (2) additional LEED checklists are provided in Figures 1.17b and 1.17b for the Office and Residential typologies, respectively, which reflect a preliminary strategy for Gold certification in coordination with the LEED Silver checklists.

Comment 3.18

Energy Models: *Based on the Demonstration Pilot commitment, when can the building energy models be updated?*

Response

The energy and emissions analysis has been updated for Program B, inclusive of the proposed Passive House (or equivalent) demonstration project. Refer to the response to Comment 3.6.

Comment 3.19

Energy Models: *Can the development team establish exemplary building envelope standards for each building typology?*

Response

The proposed design for each building typology has identified high-performance building envelope, HVAC systems, and lighting design that exceed the MA Stretch Energy Code, which result in an overall reduction of energy use and GHG emissions compared to a conventional development project. The Proponent has also committed to a demonstration Passive House (or equivalent) project and will continue to explore cost-effective energy and emissions efficiency as each building design advances. Together, these measures support the City's goal of reducing GHG emissions.

Comment 3.20

Energy Models: *The developer should include building CHP systems wherever base domestic hot water loads support feasibility. The developer should also assess the use or inclusion of CHP for meeting building emergency power requirements, and for providing secure power for tenants and onsite critical facilities and areas.*

Response

The Proponent has evaluated building CHP systems for residential and hotel typologies as part of DEIR/DPIR in Section 7.3.6 of Chapter 7, *Greenhouse Gas Assessment* (pages 39-44). Appendix E of the DEIR/DPIR includes calculations and pertinent assumptions.

Comment 3.21

Resiliency: *The proponent should evaluate stormwater infrastructure to the Chelsea Creek and ensure that it has adequate capacity to handle additional volume. If the existing system does not have capacity the proponent should design and install a system to handle the added volumes.*

Response

A preliminary evaluation of the stormwater infrastructure to Chelsea Creek has been completed. The results of this evaluation found that the system appears to have adequate capacity to pass the additional volume of stormwater anticipated from the Project, once deferred maintenance and repairs to the system are completed, the Proponent has committed to undertake the maintenance and repairs to the Stormwater System and, if necessary, design and install improvements to maintain the functionality of the Stormwater System's drainage to Chelsea Creek. The Proponent is coordinating with Massport, MassDOT, MBTA, and others, to coordinate and evaluate the improvements.

Comment 3.22

Resiliency: *The proponent references use of subgrade garages adjacent to floodable open space for flood storage. Additional information should be provided regarding functional and structural feasibility of subgrade parking areas being used for storing urban runoff. If this is a viable option and part of the projects flood management measures, then the recommended storage volume of the garages must be a design requirement as part of those building components.*

Response

As described in the DEIR/DPIR, the Project plans to construct several floodable parking garages as Phase 3 of the Project that are hydraulically connected to Sales Creek. Flow would travel to these floodable garages during major flood events, allowing stormwater to be detained and slowly discharged back to Sales Creek at the conclusion of the flood event.

The Proponent is committed to maintaining existing flood storage capacity at the completion of Phase 3 up to the modeled current-day 100-year event in the overbank area of Sales Creek. As design development progresses the Project Team will continue to investigate areas for additional temporary flood storage and the potential to lower proposed grades to maximize on-site flood storage. Notice of Intent ("NOI") submissions to the Conservation Commission will include calculations confirming that Phase 3 would maintain the flood storage capacity for the modeled current-day 100-year event from pre to post development conditions. Additional design and details of this proposed floodable parking garages will be provided as each of those buildings go through its individual design review process.

Comment 3.23

Resiliency: *The analysis notes that during significant coastal storm events with surge elevations above 14' BCB Bennington Street would be overtopped, leaving the pump station and tide gate non-functional. Mitigating strategies including an additional tide gate and improvements to the capacity of the existing pump station are proposed to protect the project site and upstream areas of Revere. Based upon the proponent's*

modeling and probability analysis the timing and phasing of the site measures, new tide gate and existing pump station improvements should be discussed.

Response

The Project's DEIR/DPIR submittal included an analysis of the probability of each of the modeled storm events. The probability of these sea level rise projections is very low in the associated forecasted year. The DEIR also provided information regarding the phasing of the flood mitigation improvements. The Project has committed to providing compensatory flood storage, up to the project's modeled 100-year floodplain, for Phase 2 and 3 of the Project. After these phases, but prior to Phase 4R where the project begins to result in a net fill, the project is proposing upgrades to the existing Alfred H. Long Pump Station and construction of the additional Tide Gate. The proponent has committed up to $2,625,000 for improvements to the Alfred H. Long Pump Station.

Additional information related to this topic will be provided in the forthcoming FEIR as part of the updated Resiliency Study. This will include a detailed hydraulic analysis of the phased development, using these conservative sea level rise estimates, to evaluate the timing/phasing of the construction of the proposed resiliency and flood protection mitigation measures.

Comment 3.24

Resiliency: *The project site is also vulnerable to coastal flooding from the Chelsea Creek to the west, and through Revere to the north, however, the DEIR/DPIR and modeling do not address these vulnerabilities. The proponent should address the extent to which the site is susceptible to flooding from these areas and the site and district scale measures needed to prevent future flooding from these pathways. The document notes that a regional flood barrier along the Bennington Street corridor coupled with improvements to the existing pump station provides the highest level of flood protection to all areas. This district scale option is consistent with the Mayor's Resilient Boston Harbor vision to protect all of Boston's waterfront neighborhood. The proponent is expected to be involved and contribute to advancing these district scale solutions and working with the City's of Revere, Boston, State agencies and other stakeholders that will benefit from these solutions.*

Response

The Project Site is vulnerable to coastal flooding from Belle Isle Inlet to the south, Chelsea Creek to the west, and through Revere to the north. The Resiliency Adaptation Study model includes coastal flooding [and sea level rise ("SLR")] from both Belle Isle Inlet and Chelsea Creek for all 22 storm scenarios modeled.

Flood barriers along both of these bodies of water would provide valuable flood protection for the region. Coastal flooding through Revere from the north is currently protected by a seawall and Revere Beach Boulevard up to approximately elevation 19-feet Boston City Base ("BCB") (approximately elevation 12.5-feet

NAVD88). Of the nine SLR scenarios investigated in the Resiliency Adaptation Study, one scenario which assumes 4.2-feet of SLR (2070 high projection), exceeded 19-feet BCB. The study assumed that the seawall or Revere Beach Boulevard would be elevated to continue to provide protection to the Shirley Avenue Neighborhood and the region as a whole. If a seawall or Revere Beach Boulevard is not elevated, the Shirley Avenue Neighborhood will be inundated before the project site becomes inundated.

The Proponent has also committed as part of its DEIR/DPIR submittal to facilitate a conceptual feasibility study for a regional flood protection barrier along Bennington Street prior to Phase 4 of the Project. The conceptual feasibility study will engage stakeholders, evaluate potential berm cross-sections and locations, and investigate costs and permitting associated with the alternatives. The Project's FEIR submission will also evaluate the effectiveness of potential regional flood barriers along Bennington Street and Chelsea Creek.

Comment 3.25

Resiliency: *Due to the time scale associated with the full build condition the proponent should ensure building and site design maintains flexibility to address changes in the extent and onset of climate impacts, as well as advances in building materials and systems to mitigate the effects of heat, stormwater and coastal flooding*

Response

The proponent will consider updated climate change projections as they become available during the construction of the Project.

Letter 4: BPDA Smart Utilities

Comment 4.1

Telecommunications Utilidor:

- *Provide a map/diagram highlighting the sections of the roads on the development area where a Telecom Utilidor will be installed, including access points to the Utilidor (i.e., manholes).*
- *Provide the following information:*
    - *Dimensions of Telecom Utilidor:*
        - *Cross section dimensions (i.e., diameter or width X height)*
        - *Length*
    - *Capacity of Telecom Utilidor: (i.e., number of interducts, 2 inch (ID) pipes, etc.)*

Response

Please refer to Figure 2.7a-c illustrating the conceptual layout and cross-sections of the Telecom Utilidor. It is anticipated that manholes will be spaced a maximum of 300-feet apart with additional access points located at proposed intersections.

The Telecom Utilidor is anticipated to be a 4-foot wide by 5-foot high prefabricated utility corridor with racks on the interior sides to secure wire runs. The design of the Telecom Utilidor is preliminary in nature and may change as the design progresses; however, the intent is to follow the Smart Utility Standards wherever feasible.

Comment 4.2

Green Infrastructure:

- *Provide a map/diagram highlighting where on the development Green Infrastructure will be installed*
- *Provide the following information:*
    - *Types of Green Infrastructure included in the project: (drop down)*
        - *Bioretention basins*
        - *Bioretention planters*
        - *Infiltration chambers*
        - *Tree pits/trenches*
        - *Dry wells*
        - *Permeable paving*
        - *Other (specify)*
    - *Total impervious area of the development: (Number field)*
    - *Volume of stormwater that will be retained: (Number field) - Note: Should equal to at least "Total impervious area times 1.25 inches"*

Response

Green infrastructure is important to achieving the overarching goals of the stormwater management system, which include providing a high level of treatment, mitigating peak flows to Sales Creek, providing adaptability for climate change and integrating the Stormwater System into the open space. As an extension of the Boston Complete Streets guidelines, opportunities to incorporate low impact development ("LID") techniques, such as rain gardens/biofiltration, tree filters and green roofs, will be considered as the Master Plan is further developed. Refer to Figure 2.8. Measures include:

- As the design for plazas, key intersections and pocket parks further develops rain gardens/biofiltration systems and bioretention planters will be incorporated.

- Subsurface infiltration chambers have been proposed to recharge groundwater.
- The extensive street tree network will be designed as a filtration system to provide treatment for sidewalk and plaza runoff, essentially the robust street tree corridor will function as a linear tree filter.
- A portion of the buildings will direct roof runoff to cisterns where it will be reused as irrigation water for the proposed landscape elements and/or other water reuse components
- 20 percent of the rooftop area will be green roofs, thereby reducing impervious surfaces across the Site.
- Key open spaces have been designed to be floodable to enhance the overall resiliency of the development.

Detailed design plans will be provided for review during the Development Review Process outlined in the draft PDA Documents (accessible via the web links provided in Appendix A).

Under existing conditions, the property contains 72 acres of impervious area, plus an additional 23 acres of compacted dirt race track and gravel areas, which have severely reduced permeability and hydraulically function as impervious area. Under proposed conditions the total impervious area is 109 acres, which represents a 14-acre increase.

The Master Plan Project will rely on an entirely new stormwater management system that will be designed and constructed to treat and detain stormwater prior to discharging to Sales Creek and Chelsea Creek. This system will be separate and independent of the City's stormwater and sewerage systems and will be privately maintained and operated.

The Master Plan Project's stormwater management system will not discharge to the City's system. Consequently, the typical recommendation to retain the first 1.25-inches of rainfall on-site is not being enforced by BWSC for the Suffolk Downs site. Nevertheless, the Proponent is targeting re-use and/or retention of stormwater runoff from the first one (1) inch of rainfall on impervious areas on-site, to the maximum extent practicable. All buildings within the Chelsea Creek watershed will store, reuse, or infiltrate the first one (1) inch of rainfall (with the exception of the smaller townhouse style buildings). Additional retention will be achieved by the on-site infiltration system, bio-retention systems, and tree-filters. The Project will further help increase potential on-site infiltration by including a layer of imported planting soils that will be more permeable and less compacted than what is currently on-site within all publicly accessible green spaces.

Comment 4.3

Adaptive Signal Technology:

- Provide a map/diagram highlighting where on the development AST new signals and improvements to signals will be installed

- Provide the following information:
    - Describe how the AST system will benefit/impact the following modes:
        - *Pedestrians*
        - *Bicycles*
        - *Buses and other Public Transportation*
        - *Other Motorized Vehicles*
    - Describe the components of the AST system (system design and components).

Response

The intersections that will include Adaptive Signal Technology ("AST") as part of the mitigation program are illustrated in Figure 2.11. By their nature, AST systems are more nimble than conventional traffic signals and add more efficiency to the signal timing plan by conditionally changing timing based on real time traffic conditions. This added efficiency and real time adjustments benefit all modes of transportation.

Because there are currently no national standards for Adaptive Signal Technology, the components and algorithms will vary depending on which manufacturer and system that are chosen. As part of the design process, the AST will be customized for the mitigation measures proposed as part of the Project, which will be established in coordination with BTD.

Comment 4.4

Smart Street Lights: *Provide a map/diagram highlighting where new street lights will be installed or where improvements to street lights will be made*

Response

Streetlighting will be installed throughout the Master Plan Project Site for vehicular and public safety standards. Location and specifications for the street lights, including the details of design compliance with the smart utility standards is anticipated to be provided through the Development Review Process as defined in the PDA Documents. Smart streetlights are anticipated to include additional electrical connections and fiber optic services.

Comment 4.5

Smart Utility Standards:

- *Provide typical below and above grade cross section diagrams of all utility infrastructure in your development area (including infrastructure related to the applicable SUTs)*

- *Provide typical below and above grade lateral diagrams of all utility infrastructure (including infrastructure related to the applicable SUTs)*

Response

The provided figures are preliminary in nature and may change as the design progresses; however, the intent is to follow the Standard cross-sections wherever feasible. Detailed plans are subject to the future Development Review Process as outlined within the PDA.

Letter 5: Boston Water and Sewer Commission

The Commission's comment letter on the DPIR acknowledged that the have *"reviewed the project proponent's response to each Commission comment and determined all comments were addressed to the satisfaction of the Commission."* Accordingly, no response by the Proponent is necessary. We thank the Commission for their review and input on the Project.

Letter 6: Boston Parks and Recreation Department

Comment 6.1

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

Response

Figure 2.10 (plan of active, passive, and civic) breaks down open space area by type, showing 22 acres of active recreation which will serve the 15,720 new residents at the site (ratio of 1.34 acres / 1,000 people). Figure F in the PDA Master Plan demonstrates how the open space is being calculated. The draft PDA Documents are accessible via the web links provided in Appendix A.

Open space related to Article 80 or through MEPA is quantified in response to Comment 6.4.

Comment 6.2

A needs analysis should be completed based on the projected users of open space. It should estimate the demand for active recreational needs and quantify the open space provided onsite to accommodate those needs, as well to help meet the active recreation needs in East Boston.

Response

The Project as a whole will add 40 acres of open space, approximately 21 acres of which will be dedicated to active recreation. The project will provide 1.34 acres of open space for active recreation per 1000 residents, which improves upon East Boston's 1.31 acres of open space suitable for active recreation per 1000 residents. Open spaces on the southern side of the site, such as Orient Heights Park, will provide open space to areas of East Boston that have a high park need.

Comment 6.3

Open space for active recreation should be provided onsite, or in the form of a contribution commensurate to the scale of the development to the City's Fund for Parks, to be used for open space, improvements to existing public parks and climate resiliency in East Boston.

Response

Approximately 21 acres of open space suitable for active recreation will be provided onsite. This includes sports courts and fields (soccer, basketball, tennis, pickle ball), playgrounds, and other forms of active play. Ample open space is set aside to help control flooding and the effects of climate change, including 8 acres of wetlands and an additional 8 acres of passive open space. In total 40 acres of open space will be provided.

Comment 6.4

Open space that is required, negotiated or proposed as mitigation for Article 80 or MEPA approval as a public benefit should be transferred to public ownership or otherwise protected in perpetuity to ensure that it does not change with future amendments to the development plan…Open space that is required, negotiated or proposed as mitigation for Article 80 or MEPA approval as a public benefit should be implemented in the first phase of development.

Response

The Proponent has committed that 25 percent of the Project Site will be built and maintained as publicly accessible open space, with approximately 27 acres in Boston and an additional approximately 13 acres in Revere, all of which will be available to Boston residents. 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, which detail the specific open space commitments that are being made by phase. The open space is phased along with the rest of the development, and it is not feasible to construct the entirety of the open space network as part of the first phase of the project. There is no minimum open space requirement applicable to the Project Site, including under

Boston zoning, pursuant to the Article 80 or PDA process, pursuant to state law, or otherwise. Nevertheless, as noted, the Proponent intends to commit through the PDA Documents that 25 percent of the site will be built and maintained as publicly accessible open space, with approximately 27 acres in Boston and an additional approximately 13 acres in Revere, all of which will be available to Boston residents.

Comment 6.5

The DEIR/DPIR does not provide an estimate of the number of residents or users. However, the infrastructure impacts and mitigation for water demand and sewage generation were based on 10,000 residential units. This could be roughly estimated at 10,000-40,000 residents. The submittal does not clearly provide the estimated number of employees, shoppers, or visitors.

Response

The Project is estimated to create 15,720 residential users (11,370 in Boston). The wastewater and water system design are based upon demands developed based on regulatory standards, specifically 310 CMH 15.00 the State Environmental Code (Title V). Title V estimates the average daily wastewater flow based upon building use, rather than the projected number of users. This estimate tends to be conservative since the regulation does not take into account recent innovations in building water conservation. The estimated average daily flows are then multiplied by a peaking factor to ensure that the water and wastewater infrastructure can handle peak flows on a peak day. The proposed wastewater and water infrastructure design are adequate to serve the Master Plan. Offsite improvements to the municipal systems serving to site are being coordinated with the City of Revere Engineering Department and the Boston Water Sewer Commission to ensure adequate capacity is available.

Comment 6.6

The proponent should clarify how it is counting the acreage, type and use of open space; detail how the open space will meet or mitigate each of the following; and note whether the same acreage is fulfilling multiple roles as design features, regulated, mitigation or public benefit:

- *Open space as mitigation under M.G.L. Chapter 30 Section 61;*
- *Open space required under M.G.L. Chapter 91;*
- *Open space approved by the EOEEA Secretary as a Public Benefits Determination;*
- *Open space which serves the needs of the neighborhood as identified in the Imagine Boston 2030 and the Open Space and Recreation Plan;*
- *Open space required by the underlying zoning;*
- *Open space mitigated for the Article 80 Planned Development Area in lieu of zoning;*

- *Open space which serves the active recreational needs of the users of the development;*
- *Open space which serves the passive recreational needs of the users of the development;*
- *Public realm space such as retail plazas; streets, sidewalks and parking areas;*
- *Open space intended to protect the project from coastal impacts of climate change; and*
- *Mitigation for impacts to existing public open space in the neighborhood.*

Response

The open space calculation is explained in the response to Comment 6.1. A breakdown response per bullet point is as follows:

Open space as mitigation under M.G.L. Chapter 30 Section 61;
Open space is not a specific requirement under M.G.L. Chapter 30 Section 61 but the Proponent is committing to 25% open space.

Open space required under M.G.L. Chapter 91;
Open space is not a public benefits requirement but the Proponent is committing to 25% open space.

Open space approved by the EOEEA Secretary as a Public Benefits Determination;
Open space is not a public benefits requirement but the Proponent is committing to 25% open space.

Open space which serves the needs of the neighborhood as identified in the Imagine Boston 2030 and the Open Space and Recreation Plan;
See response to Comment 6.8.

Open space required by the underlying zoning;
0 acres of open space are required under current zoning but the Proponent is committing to 25% open space.

Open space mitigated for the Article 80 Planned Development Area in lieu of zoning;
Open space is not a specific requirement under Article 80 provisions respecting Planned Development Areas but the Proponent is committing to 25% open space.

Open space which serves the active recreational needs of the users of the development;
There are approximately 21 acres of active open space.

Open space which serves the passive recreational needs of the users of the development;
There are approximately16 acres of passive open space.

Public realm space such as retail plazas; streets, sidewalks and parking areas;
There are approximately 3 acres of civic space including plazas. Sidewalks, streets and parking areas are not included in the open space calculations. There are also approximately 63,000 linear feet of sidewalk and cycle track.

Open space intended to protect the project from coastal impacts of climate change; and
There are approximately 16 acres of passive open space which are largely wetland areas that help to control flooding.

Mitigation for impacts to existing public open space in the neighborhood.
There is no specific open space that is designated as mitigation for impacts to existing public open space in the neighborhood but the Proponent is committing to 25% open space.

Comment 6.7

A needs analysis should be completed based on the projected users of open space. It should estimate the demand for active recreational needs and quantify the open space provided onsite to accommodate those needs, as well to help meet the active recreation needs in East Boston. An impact assessment should be done to determine impacts to public open space and mitigation.

Response

It is estimated that there will be 22,090 on-site employees at Suffolk Downs, including residents, office workers, and retail and hotel employees. With approximately 21 acres of open space, the project provides 1.81 acres of space suitable for active recreation per 1000 on-site employees.

Comment 6.8

The proponent should address how it is meeting and improving the above ratio and the public open space needs outlined in the City's Imagine Boston 2030, which includes the Open Space and Recreation Plan.

Response

Imagine Boston 2030 specifies that new open spaces will be designed to meet the needs of residents and workers, and that new development will create spaces for arts and culture. As outlined in previous comments, the development will support residents and workers. Additionally, it will provide ample civic spaces to support community, culture and the arts. This includes civic plazas like Beachmont and Belle Isle Square as well as a Civic Node and pavilion within the Central Common. As shown in Figure 2.11a and 2.11b, the plan is also in line with Boston 2030's goals of

creating flood protection through open space, preserving the wetlands and prioritizing resilient open spaces. The Project recognizes the City's Open Space and Recreation Plan emphasis on the high park need score in East Boston. Orient Heights, just south of the project site, has a particularly high park need score. As shown in Figure 2.12a and Figure 2.12b, the Project thus places open spaces such as Orient Heights Park at its southern edge to service the Orient Heights community and provides connections from the neighborhood into the open space system of the project.

Comment 6.9

A fully developed active recreation program can be accommodated within the 40 acre open space system proposed for this new neighborhood. Additional open space amenities 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.

Response

The open space at Suffolk Downs will consist of a range of types of outdoor space at a range of scales. The Central Commons will host larger programs. The Central Open Field can support soccer, ultimate frisbee, and community picnicking and events and the Civic Node will have a pavilion and area for community events and interface with the pond. The Active Linear Park runs through the site, providing smaller active recreation such as pickle ball and tot lots. It connects to larger active recreation nodes like the Linear Park Open Field, Gateway Park, and Orient Heights Park which include areas for yoga, kids soccer, basketball, a dog park, and fields for open play. Passive recreation occurs throughout the site, including strolls along the Green Fingers, Sales Creek, and the wetland buffers. Beachmont and Belle Isle Square serve a civic purpose. As well, the outdoor theater acts as a venue for formal events and as casual social space when not formally programmed. The network of open spaces is linked together through pedestrian paths and cycle tracks and connect to the surrounding neighborhoods and open space trails regionally. Refer Figure 2.13a and Figure 2.13b.

Comment 6.10

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

Response

As noted in the response to Comment 6.4 above, the Proponent has committed that 25 percent of the Project Site will be built and maintained as publicly accessible open space, with approximately 27 acres in Boston and an additional approximately 13 acres in Revere, all of which will be available to Boston residents. 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, which will detail the specific open space commitments that are being made by phase. The MEPA documents and Revere Special Permit also detail the Proponent's commitments respecting open space at the site.

Letter 7: Boston Public Works Department

Comment 7.1

Site Plan: *Developer must provide an engineer's site plan at an appropriate engineering scale that shows curb functionality on both sides of all streets that abut the property and within the project site.*

Response

The roadways constructed as part of the Master Plan Project will be maintained under private ownership but open to public access. The roadways will, however, be constructed to substantially meet Boston Standards. A detailed curbing analysis will be developed prior to the development of each building parcel to ensure that the building, pedestrian, and roadway needs are met. These details will be reviewed by the BPDA through the Development Review process outlined in the draft PDA Documents accessible via the web links provided in Appendix A. Connections into existing City of Boston right of ways shall be coordinated appropriately through BTD and PIC. The details of the connection to Route 1A will be coordinated with MassDOT.

Comment 7.2

Construction Within The Public Way: *All work within the public way (existing and proposed public streets) shall conform to Boston Public Works Department (PWD) standards. Any non-standard materials (i.e. pavers, landscaping, bike racks, etc.) proposed within a public way will require approval through the Public Improvement Commission (PIC) process and a fully executed License, Maintenance and Indemnification (LM&I) Agreement with the PIC.*

Response

The roadways constructed as part of the Master Plan Project will be maintained under private ownership but open to public access. The roadways will, however, be constructed to meet Boston Standards. The Master Plan Project will involve work

within the existing public ways, including: the interim water and sewer connections; the permanent sewer connection; and the connection to the Suffolk Downs subway station. The Proponent will coordinate with PIC, as required, during the design and selection of materials used within the public right of ways for these segments of the Project. As needed, a LM&I for the non-standard materials used within the public right of ways will be developed.

Comment 7.3

Sidewalks: *Developer is responsible for the reconstruction of the existing sidewalks on all public ways abutting the project site and, wherever possible, to extend the limits to the nearest intersection to encourage and compliment pedestrian improvements and travel along all sidewalks within the Public Right of Way (ROW) within and beyond the project limits. The reconstruction effort also must meet current American's with Disabilities Act (ADA)/ Massachusetts Architectural Access Board (AAB) guidelines, including the installation of new or reconstruction of existing pedestrian ramps at all corners of all intersections. Plans showing the extents of the proposed sidewalk improvements associated with this project must be submitted to the PWD Engineering Division for review and approval.*

The developer is encouraged to contact the City's Disabilities Commission to confirm compliant accessibility within the public right-of-way.

Response

The Proponent will reconstruct the sidewalks where the construction of the Master Plan Project directly impacts the existing sidewalks and where the proposed road intersects with the existing road. The reconstructed sidewalks will comply with the Americans with Disabilities Act and the Massachusetts Architectural Access Board guidelines. As the design progresses, the Proponent will coordinate with the PWD to establish the limits of the sidewalk restoration efforts and sidewalk reconstruction plans will be submitted to the PWD Engineering Division for review and approval.

Comment 7.4

Driveway Curb Cuts:

Any proposed driveway curb cuts will need to be reviewed and approved by the PIC. The developer is also responsible for the closure of any existing driveway curb cuts abutting the property that are no longer serving active driveways.

Response

The roadways constructed as part of the Master Plan Project will be maintained under private ownership but open to public access. The roadways will, however, be constructed to meet Boston Standards. The Proponent will submit all proposed driveway curb cuts onto existing public right of ways to PIC for review and approval.

The Proponent will be responsible for the closure of all existing driveway curb cuts that will no longer serve as active driveway.

Comment 7.5

Discontinuances: *Any and all discontinuances (sub-surface, surface or above surface) within the Public ROW must be processed through the PIC.*

Response

As the design progresses, the Proponent will coordinate with PIC when proposing any discontinuances within existing public right of ways. The proposed roads within the Site are intended to be private roads open to public travel; however, the Project will involve work within the existing public ways. The following portions of the Project are anticipated to be constructed within existing public right of ways: the interim water and sewer connections; the permanent sewer connection; and the connection to the Suffolk Downs subway station. The Proponent will work with PIC during the design and selection of materials used within the public right of way when these parts of the Projects are constructed.

Comment 7.6

Easements*: Any and all easements associated with this project must be processed through the PIC.*

Response

As the design progresses, the Proponent will work with PIC to process applicable easements.

Comment 7.7

Landscaping: *Developer must seek approval from the Chief Landscape Architect with the Parks and Recreation Department for all landscape elements within the Public ROW. Program must accompany a LM&I with the PIC.*

Response

The roadways constructed as part of the Master Plan Project will be maintained under private ownership but open to public access. The roadways will, however, be constructed to substantially meet Boston Standards. The following portions of the Master Plan Project are anticipated to be constructed within existing public right of ways: the interim water and sewer connections; the permanent sewer connection; and the connection to the Suffolk Downs subway station. The Proponent will work with the Chief Landscape Architect of the Parks and Recreation Department during the design and selection of landscape elements to be used within the public right of way when these parts of the Projects are constructed. As needed the Proponent will

work with PIC to develop a LM&I for the landscape elements within the public right of way.

Comment 7.8

Street Lighting: *Developer must seek approval from the PWD Street Lighting Division, where needed, for all proposed street lighting to be installed by the developer in the public ROW, and must be consistent with the area lighting to provide a consistent urban design. The developer should coordinate with the PWD Street Lighting Division for an assessment of any street lighting upgrades that can be considered in conjunction with this project. All existing metal street light pull box covers within the limits of sidewalk construction to remain shall be replaced with new composite covers per PWD Street Lighting standards. Metal covers should remain for pull box covers in the roadway.*

Response

Refer to the response to Comment 4.4 above for compliance with the BPDA's Smart Utilities Policy.

The proposed roads within the Project Site are intended to be private roads open to public travel; however, the Project will involve work within the existing public ways. As the design progresses, the Proponent will coordinate with the PWD Street Lighting Division (as needed) for any proposed street lighting to be installed or replaced within the public right of way. The Proponent will make an effort to utilize street light fixtures that are consistent with area lighting and provide a consistent urban design within the public right of way.

Comment 7.9

Roadway: *Based on the extent of construction activity, including utility connections and taps, the developer will be responsible for the full restoration of the roadway sections in the public ROW that immediately abut the property and, in some cases, to extend the limits of roadway restoration to the nearest intersection. A plan showing the extents and methods for roadway restoration shall be submitted to the PWD Engineering Division for review and approval.*

Response

The Proponent will restore sections of public roadways that are disturbed as result of the construction of the Project. The Proponent will coordinate with PWD in defining the limits of the roadway restoration effort. As the design progresses, plans showing the extents and methods for the roadway restoration within public right of way for Boston Streets will be submitted to the PWD Engineering Division for review and approval.

Comment 7.10

Project Coordination: *All projects must be entered into the City of Boston Utility Coordination Software (COBUCS) to review for any conflicts with other proposed projects within the public right-of-way. The Developer must coordinate with any existing projects within the same limits and receive clearance from PWD before commencing work.*

Response

The Proponent will enter the projects into the COBUCS and review any potential conflicts with other proposed projects within the public right-of-way. The Proponent with coordinate with the City in identifying any existing projects within the limit of work and obtain clearance from PWD before beginning the work.

Comment 7.11

Green Infrastructure: *The Developer shall work with PWD and the Boston Water and Sewer Commission (BWSC) to determine appropriate methods of green infrastructure and/or stormwater management systems within the public right-of-way. The ongoing maintenance of such systems shall require an LM&I Agreement with the PIC.*

Response

The proposed roadways within the Site are intended to be private roads open to public travel, and the proposed stormwater management system will be maintained under private ownership. As detailed in the response to comment 4.2, green infrastructure is essential to achieving the goals of the stormwater management system. The Stormwater System has been master planned to date, and the green infrastructure components will be refined as the design evolves for the Project. The final details of the system will be coordinated with BWSC. In accordance with the 2008 MassDEP stormwater handbook, a detailed operation and maintenance manual shall be developed for the stormwater management system.

Comment 7.12

New Roadways: *All new roadways shall conform to the Public Works Department's Roadway Design Standards and layout must be established and approved through the PIC.*

Response

The proposed roads within the Project Site are intended to be private roads open to public travel; however, the Project will involve work within the existing public ways for offsite connections. Work within the public right of way will conform to the Boston PWD Roadway Design standards. The Proponent will work with PIC to establish a roadway layout for all work within the public right of way.

2.3 Response to the Impact Advisory Group (IAG) Comments

Letter 8: IAG – Joseph Arangio Jr.

Comment 8.1

I am recommending that mitigation compensation to the Orient Heights neighborhood and the East Boston community, as a consequence of the Suffolk Downs Redevelopment Project, consider the following:

(a) Shade tree planting on major streets (e.g., Bennington, Saratoga) from one end of the district to the other end, as well as in squares (Orient Heights, Day, etc.) and Constitution Beach

(b) Street/road beautification efforts (e.g., extensive and more dense use of flowers and planters) along major streets, squares, intersections (e.g., Leyden, Bennington, Walley) and Constitution Beach.

(c) An upkeep and maintenance effort for all plantings.

Response

The Master Plan Project provides 40 acres of open space, which will be open for public use and privately operated and maintained. This area is intended for the new residents of Suffolk Downs as well as the existing East Boston Community. Orient Heights Park in particular, located adjacent to the Orient Heights neighborhood, will improve the public realm and outdoor recreation options of local residents. The Proponent will continue to work with the IAG, community, and City to identify and implement meaningful improvements which enhance the surrounding neighborhoods.

Letter 9: IAG – Ernani Jose DeAraujo

Comment 9.1

Housing*: HYM has committed to build thousands of new homes to meet the desperate housing shortage in greater Boston. They should continue to work toward developing lower cost and affordable options beyond the 13% dedicated affordable. In particular, they should consider a range of lower cost, lower amenity options such as micro units, rooming houses, and other alternative/flexible living arrangements to provide lower rent market options for a broader range of users. Moreover, they should commit to increase the amount of handicap accessible units throughout their development.*

Individuals with physical and mental disabilities have very few options for adaptable living spaces and HYM could help address this issue with their affordable and market units.

Response

The Proponent will comply with the Mayor's Inclusionary Development Policy housing program, under the Mayor's Order Relative of Inclusionary Development dated December 9, 2015 (the "IDP") and has set aside 13 percent of the total number of housing units within the Boston portion of the Site as affordable units. Pursuant to a Master Affordable Housing Agreement to be entered into by the Proponent and the BPDA with respect to the master Plan Project, which is described in the draft PDA Documents (accessible via the web links provided in Appendix A), the owner of each residential building shall enter into a separate Affordable Housing Agreement with the BPDA. The IDP requirements respecting affordable housing units may be satisfied entirely on-site, or subject to the approval of the BPDA may be redistributed to other buildings within the Suffolk Downs Site or to an off-site location. In total this is anticipated to create approximately 930 new affordable housing units proposed to be located on-site.

Also, the Proponent is proposing a broad mix of housing types including apartments, condominiums and senior housing. Within those housing types the Proponent is also providing a variety of unit types, including microunits, studios, one-bedroom, two-bedroom and three-bedroom units. It should be noted that the Proponent's commitments respecting affordable housing applies to all residential units in the Boston portion of the Project Site, including those with apartments, condominiums and senior housing units.

In addition, the Proponent has agreed to enter into a non-discrimination covenant binding on future owners that prohibits discrimination based on race, creed, color, sex, sexual preference, disability, religion or national origin.

The Proponent is also continuing to explore potential additional opportunities to create affordable housing in other East Boston neighborhoods in connection with the Master Plan Project.

Comment 9.2

Flexibility/Community Input*: Whatever initial plans are approved, there should be flexibility in the 20 year expected development time frame to revisit aspects of the plan for community input. The East Boston community went through a substantial planning effort for our waterfront in the late 1990s and by the time the economy permitted construction (over a decade later), certain aspects of the planning did not reflect the needs or preferences of the new community. I understand that each phase of the development will have its own detailed process, and this will enable timely input to ensure that future changes in living patterns, transportation, public health, etc. can be reflected as this private development grows.*

Response

The Proponent's proposed Master Plan PDA and PDA Development Plans for phases 1-5 of the Project within Boston were submitted to the BPDA on February 1, 2019. These PDA Documents include information about various aspects of the project, including information about open space, streets, building locations and dimensions and uses, public benefits, and other matters. The PDA Documents also set forth procedures for further review and approval of the design of the individual buildings and phases of the project, which shall include review by the Boston Civic Design Commission, and 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 Boston zoning code. Additional future process, as further detailed in the PDA Documents, includes the following for each individual project or portion thereof:

a. there shall be a pre-submission meeting by the Proponent with BPDA staff to initiate the process and review the proposed request,

b. following the pre-submission meeting, the Proponent shall submit a building design review package for the applicable portion of the Project, which shall contain:

(i) schematic design documents, including a site plan, schematic building plans, open space and landscaping plans, and schematic roadway designs,

(ii) studies with respect to wind, shadow, solar glare, and daylight/skydome,

(iii) the most recent traffic monitoring reports for traffic generated by the Master Project,

(iv) a LEED checklist for each building,

(v) drainage plans,

(vi) updated information regarding relevant utility infrastructure,

(vii) a description of the mitigation that will be provided with respect to each building in accordance with the mitigation schedule in the PDA documents,

(viii) a construction management plan regarding construction period impacts, and

(vi) a fact sheet summarizing the information contained in the building design review package, which shall be provided in English and Spanish,

c. copies of the building design review package shall be provided for review to elected officials representing the site, relevant City agencies, the Boston Civic Design Commission, and the Impact Advisory Group (the "IAG"),

d. the BPDA shall give public notice of the availability of the building design review package and copies shall be available at the East Boston Branch Library and for viewing and download on the Proponent's website,

e. the Proponent shall present the building design review package to the IAG and answer questions from the IAG, and the IAG shall have an opportunity to provide comments to the BPDA,

f. the BPDA shall conduct a community meeting at which the Proponent shall present the building design review package and answer questions from members of the community, and community members shall have an opportunity to provide comments to the BPDA,

g. IAG members and community members will have an opportunity to provide comments to the BPDA following the community meeting, and

h. the BPDA shall complete its review of the schematic design and other submitted materials pursuant to the BPDA's Development Review Guidelines and Article 80B of the Code.

Pursuant to the PDA Development Plans, the BPDA shall not issue a Certification of Consistency and Certification of Compliance (which are required to obtain a building permit) until the foregoing process has been completed. Aspects of individual projects or portions thereof may also require approvals of other governmental agencies, such as the City of Boston's Public Improvement Commission, Public Works Department, and the Boston Conservation Commission.

Letter 10: IAG – Madeleine Steczynski

Comment 10.1

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.*

Response

The open space will accommodate a range of active recreational areas, as illustrated in Figure 2.14a and Figure 2.14b. The Central Common can fit a multi-use soccer field or a little league baseball field. Three basketball courts, and one tennis court can be accommodated. Numerous ADA-accessible playgrounds, bocce courts, pickle ball courts, and a 0.2-acre dog park can also be accommodated.

The Project Team has revisited the referenced images, as it's intended that the open space to feel welcoming and inclusive and have added other images to help convey

this intent. Approximately 16 acres of active open space will be provided, and the Proponent will work to develop design features that are detailed to welcome all.

Comment 10.2

Urban Design/Open Space Network: *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.*

Response

In addition to the commitments in Section 3.7.2 of the DEIR/DPIR, the Proponent has proposed to fund preliminary design for a potential bicycle and pedestrian shared use path connecting from Constitution Beach State Reserve north to Revere Beach State Reserve, in additional to final design and construction of a two-way separated bike lane on Walley Street from the Project Site to Bennington Street.

Other bicycle accommodation included with the traffic mitigation package includes a connection from Tomasello Avenue across Route 1A to the west of the Suffolk Downs site, a two-way separated bike lane adjacent to Winthrop Avenue on the northern frontage of the Project Site, and bicycle accommodation along Route 1A.

Other bicycle accommodation enhancements will be completed at the Saratoga Street / Bennington Street intersection and the Winthrop Avenue / Bennington Street intersection. Some of this is associated with the shared use path preliminary design connecting Constitution Beach to Revere Beach, and some will take place as part of other traffic-related mitigation.

Comment 10.3

Sustainability/Green Building: *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. HYM 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.*

Response

The energy and GHG emissions analysis has been updated to reflect the Proponent's increased commitments made in the 2018 RRAI for both Program A and Program B. As presented in Table 7-18 of the DEIR/DPIR, the Project (without parking) demonstrated a 19.4 percent energy use savings and 17.5 percent GHG emissions reduction compared to the Base Case.

For the Program B (Pro-Residential) development program, the commitments made in November 2018 result in at least an energy reduction of 28.7 percent, an increase of 9.3 percent compared to the DPIR/DEIR Program A and at least a GHG emissions reduction of 28.5 percent, an increase of 11 percent compared to the DPIR/DEIR Program A.

The increased commitments in the RRAI also included a commitment to build all 22 Townhomes and all 12 single family homes as E+ or Passive House equivalent as well as a commitment to build a multi-family residential Passive House demonstration project of at least 50,000 square feet.

The proposed density of buildings at Suffolk Downs is out of proportion with being able to achieve Net Zero Energy performance on site. However, the full suite of increased commitments demonstrate a comprehensive strategy and the Proponent's commitment for GHG emissions reduction now and over the lifespan of the project. For example, the Proponent has committed to deployment of 2 MW of solar PV.

The Proponent has evaluated the deployment of battery storage as a means to enable a microgrid powered exclusively by renewable energy. Three fundamental inhibiting factors have been identified. Firstly, the battery storage capacity needed to enable the 100% renewable energy based microgrid is currently economically infeasible in absence of significant incentives. Secondly, the amount of roof space available only enables a small portion of building load to be served through solar PV. Finally, significant regulatory constraints related to utility franchise rights and electricity sub-metering have been identified. Furthermore, the Project incorporates measures to accommodate a future microgrid including easements in the roads for future cabling and vertical shaft space within the buildings for future microgrid connections.

Comment 10.4

Sustainability/Green Building: *HYM 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.*

Response

The increased commitments were made in November 2018 through the RRAI.

Comment 10.5

Sustainability/Green Building: *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.*

Response

As stated previously in the response to Comments 3.3 and 3.10 above, following the DEIR/DPIR filing, the Proponent increased commitments to energy efficiency/GHG emissions mitigation in the MEPA RRAI. Specifically, the Proponent made two additional commitments with regard to on-site renewable energy. First, the Proponent committed to all buildings being solar ready and second, the Proponent committed to install a minimum of 2MW of rooftop solar photovoltaic systems. Additionally, the DEIR/DPIR included commitments to continue to evaluate the cost-effectiveness of roof top solar PV as individual buildings progress and to install a minimum of 20 percent green roof area.

Comment 10.6

Sustainability/Green Building: *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.*

Response

Height restrictions imposed by the FAA across the majority of the Suffolk Downs site in both Revere and Boston preclude the use of wind turbines that are large enough to generate a significant amount of electricity. As such, the Proponent has focused its analysis and consideration of on-site renewable energy to roof top solar photovoltaic systems to generate carbon-free electricity on-site. As part of the increased commitments made in the RRAI, the Proponent committed to a minimum of 2MW of rooftop solar PV to be installed on-site and that all buildings will be solar PV ready such that additional PV beyond the 2MW could be installed in the future.

It is important to note the LEED rating system is a broad green building rating system focused on environmental outcomes beyond energy and GHG emissions reduction. A LEED-Platinum building does not require net-zero energy performance. The increased commitments made in the RRAI are a comprehensive and flexible strategy addressing energy efficiency, net zero design and renewable energy in contributing to the City's commitment of carbon neutrality by 2050.

Comment 10.7

Sustainability/Green Building: *The proponent should commit to a specific number of electric vehicle charging stations. I suggest six per building onsite for a minimum of 288 spaces.*

Response

In compliance with BTD requirements, to further reduce GHG emissions associated with vehicles, Electric Vehicle ("EV") charging stations will be provided within in the

structured parking across the Master Plan, including "EV ready" spaces, meaning that they are able to be converted to EV-equipped spaces as the demand grows. The EV ready spaces will be constructed with sufficient electrical capacity and conduit will be installed in advance to serve these spaces.

Comment 10.8

Transportation: *The on and off site circulator buses proposed by the developer should be electric.*

Response

The Proponent is actively working with the City, the MBTA and MassDOT on the evaluation and further refinement of commitments regarding implementation of new on-site and regional shuttle services. The Proponent will continue to explore the use of low-emissions vehicles, such as electric buses at the time of implementation of the future shuttle bus service.

Comment 10.9

Transportation: *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.*

Response

Refer to response to Comment 1.11.

Comment 10.10

Summary of Mitigation/Draft Section 61 Findings: *The proponent should exceed the Inclusionary Development Policy and construct 20% inclusionary housing in both the Boston and Revere parcels, with at least 18% on-site and linkage funds to remain in East Boston.*

Response

Refer to the response to Comment 9.1 above.

Comment 10.11

Summary of Mitigation/Draft Section 61 Findings: *The proponent should include additional transit-directed traffic mitigation including a minimum $15m commitment toward the construction of the Blue/Red line connecter for the MBTA.*

Response

Refer to response to Comment 1.2

Comment 10.12

Summary of Mitigation/Draft Section 61 Findings: *The proponent should commit to the creation of a perpetual community benefit fund supported by HYM 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.*

Response

It is not City of Boston practice to develop a perpetual community benefit fund. The Proponent is committing to providing mitigation and community benefits that includes but is not limited to:

- Approximately 40 acres of publicly accessible open space;
- Approximately 65,000 linear feet of cycle track and sidewalk connecting the Project Site throughout and to neighboring areas;
- Construct traffic and public transportation improvements;
- Provide a forward-looking stormwater management and resiliency strategy to address climate change;
- Approximately 50,000 square feet of indoor civic space across the Project Site;
- GHG emissions reductions through sustainable building design, including a 50,000 square foot demonstration Passive House multi-family building, 12 Passive House or energy positive single-family homes, and 22 Passive House or energy positive townhouses;
- Set aside 13 percent of the total number of housing units as affordable units under the Mayor's IDP housing program; in addition to housing and workforce exaction (linkage) payments, as well as I/I payments.

2.4 Responses to Elected Officials' Comments

Letter 11: Mayor Brian M. Arrigo, City of Revere

These comments are supportive of the Project; there are no comments that require direct responses.

2.5 Responses to Community Groups Comments

Letter 12: Neighborhood of Affordable Housing

Comment 12.1

Belle Isle Marsh is a major community asset. Any plans to protect the new Suffolk Downs must not harm this local biodiverse and open space treasure. We are certain you have thought about it but how can Suffolk Downs guarantee its plans will meet these criteria?

Response

The Proponent recognizes and values the importance of Belle Isle Marsh and note that both Sales Creek and Belle Isle Marsh are protected under a number of environmental regulations. For one, the stormwater management system proposed, as well as any improvements proposed within wetland resource areas, are required to be reviewed and approved by the Boston and/or Revere Conservation Commission.

The Project has incorporated several measures to ensure that the Marsh is not negatively impacted. A new stormwater management system, which utilizes a combination of green infrastructure and conventional best management practices ("BMPs") is proposed to improve the quality of stormwater runoff entering Sales Creek. This stormwater management system will provide a higher level of stormwater treatment than standard practice, due to the classification of Sales Creek and the H-series intermittent stream as Class SA Outstanding Resource Waters ("ORWs").

Additionally, in conjunction with the new stormwater management system, a Site Owner's manual will be developed that will outline pollution source control methods and good housekeeping practices such as restrictions on fertilizers, herbicides and pesticides, street sweeping requirements, and removal of leaf litter and weedy vegetation. This Site Owner's manual will be finalized and implemented in association with future Notice of Intent filings as the development is advanced.

Additionally, an invasive species mitigation program is proposed along Sales Creek and the proposed site landscaping will incorporate native species within Riverfront Area.

Comment 12.2

We have seen drafts which allude to a berm along Bennington St. with flood gates along Bennington St. that protect Suffolk Downs. Has Suffolk Downs or DEP analyzed those plans to see if they may harm Belle Isle Marsh?

Response

The Proponent has proposed an additional tide gate as part of the Master Plan Project's DEIR/DPIR submittal at the intersection of Sales Creek and the Project's eastern right-of-way. MassDEP reviewed and commented on this proposal and will continue to do so as part of the ongoing MEPA review process. Sales Creek, under existing conditions, includes a tide gate that restricts tidal flow to Sales Creek. Due to the existing tide gate, the additional tide gate will not impact Belle Isle Marsh.

Comment 12.3

We might agree the berm might be a very nice green asset to the community. Perhaps part of a bike or walking trail connected to Belle Isle Marsh and Suffolk Downs. If it is an asset to protect Suffolk Downs, can you tell us now if Suffolk Downs would be paying for this protective measure?

Response

The Proponent has committed $2,625,000 as part of the Project's DEIR for flood protection measures at the Alfred H. Long Pump Station prior to Phase 4 of the Project. These funds could be used on a different flood protection project (including a berm) if further evaluation supports the alternative would provide a greater flood protection benefit for the area than upgrading the pump station.

Comment 12.4

We know that there are thoughts about expanding the roadway on Rte 1. While we don't have comments on traffic, we do wonder what protections will be in place on the Chelsea Creek side so that the oil tanks do not become a hazard to the whole of East Boston? Sales Creek used to flow between the Creek and Belle Isle Marsh, so we are wondering where the rising waters go?

Response

The existing oil tanks include protected earthen berms or secondary containment to protect from a potential spillage of oils and hazardous waste. These measures also provide a secondary benefit in the form of flood protection from coastal storm surge. If coastal storm surge was to reach an elevation of the oil tank farm, the oil tanks would be protected by their secondary containment and earthen berms. Potential coastal floodwaters would flow around the earthen berms and tank farms similar to existing conditions.

The proposed Route 1A corridor improvements will be subject to a formal design review process with MassDOT, which will include environmental protections for construction and future operations.

Comment 12.5

We don't have knowledge of how the housing within Suffolk Downs will be developed but we do wonder if you plan on raising it up so that it meets at least 2070 sea level rise projections? We are raising up our own housing along the Harbor and Chelsea Creek.

Response

The Project is targeting a finished floor elevation in accordance with the BPDA Sea Level Rise Design Flood Elevations (SLR-DFE) where feasible. The BPDA SLR-DFE is comprised of hydraulic modeling results (which includes 40-inches of sea level rise, and 2.5-inches of subsidence) and freeboard (12-inches for non-critical and 24-inches for critical buildings).

Comment 12.6

Will the community have access to any kayaking or canoeing opportunities on site?

Response

The water bodies within the Project Site – Horseshoe Pond and Sales Creek - are sensitive environments and are not deep enough to accommodate this type of activity. Children and adults may enjoy remote control boating on the Horseshoe Pond.

Comment 12.7

Can NOAH youth participate with the HYM team in programming for these recreation, climate and open space areas?

Response

The Proponent has and will continue to actively engage the community and key community stakeholders on the future use and programming of our open space areas.

Letter 13: East Boston Chamber of Commerce

These comments are supportive of the Project; there are no comments that require direct responses.

Letter 14: LivableStreets Alliance

Comment 14.1

Parking: *We are concerned that advantages provided by creating people-centered open space and recreational spaces within the site will have reduced benefit and impact if the site is built to accommodate and encourage a plethora of personal vehicles.*

Response

The Project Site roadways are anticipated to be constructed in accordance with Complete Streets guidelines to accommodate all users. The robust network of sidewalks and cycle tracks will provide connectivity along with safe crossings throughout the site.

Comment 14.2

Public Transportation: *Given the acknowledged reduction in LOS for MBTA bus riders and the projection of not meeting Go Boston 2030 goals even eight years after the goal deadline, we encourage the proponent to return to the drawing board alongside the City of Boston, MassDOT, and the MBTA to consider how this site can be a better TOD site that meets state and municipal goals for mode shift and climate resiliency. We encourage the proponent to consider direct investments in the MBTA Blue Line to maintain the LOS at an A at both Suffolk Downs and Beachmont Stations. We also encourage the proponent to consider targeted investments in East/West transit options including increased bus services and bus priority lanes. Finally, we encourage the proponent to work alongside the City of Revere and the MBTA to consider the construction of a previously proposed commuter rail station along the Rockport Line.*

Response

Refer to response to Comment 1.2

Comment 14.3

On a site this large and served by transit and emerging jobs we think it should be a priority for the region that this site include more than the City of Boston mandated 13% inclusionary affordable housing.

Response

Refer to the response to Comment 9.1 above.

Comment 14.4

In addition, we are concerned that the proponent has not considered the possibility of building the site as a microgrid, or considered the possibility of building out passive housing or net zero buildings. These types of equity, energy, and environmental concerns would establish this site as a unique cutting-edge development demonstrating the potential for future energy independent sites.

Response

The increased commitments in November 2018 RRAI included a commitment to build all 22 Townhomes and all 12 Single family homes as E+ or Passive House equivalent as well as a commitment to prepare a schematic design and cost estimate of a 200,000 square foot multi-family residential building for both a preferred/proposed design and a Passive House design. The Proponent additionally committed to build a multi-family residential Passive House demonstration project of at least 50,000 square feet in Phase 1B.

The full suite of increased commitments demonstrates a comprehensive strategy and the Proponent's commitment for GHG emissions reduction now and over the lifespan of the project.

The Proponent has also committed to having the Project Site and its buildings as microgrid ready and will be working with the City of Boston on its new Smart Utility Guidelines as the site gets built out.

Comment 14.5

We encourage the proponent to consider ways that the redesign of Route 1A can include safe and accessible crossings for pedestrians and cyclists that prioritize public access to potential future open space along Chelsea Creek.

Response

Refer to response to Comment 1.4

Comment 14.6

We are further concerned that the proposals for redesigned Bennington Street and Route 1A are not fully considering the impacts of sea level rise through design that elevates those edges and creates a truly resilient site.

Response

The proposal for a redesigned Route 1A is in preliminary design phases only. Bennington Street is currently not planned to be redesigned, however the Proponent is facilitating the design of a conceptual bike path along Bennington Street. The Proponent has evaluated extensively in the DEIR/DPIR the flow of water

onto and off the Suffolk Downs project site and abutting properties, the Proponent continues to refine and expand the resiliency assessment with an analysis of the flood protection benefits and effectiveness of a regional barrier along Bennington Street and Route 1A to the Project Site and abutting properties, which includes the Suffolk Down MBTA Blue Line Station and a portion of the train tracks. The Proponent has also committed to conducting a feasibility study for a regional flood protection barrier along Bennington Street which would provide material protection to both MBTA Blue Line stations, the blue line train tracks, Bennington Street, Beachmont Square area and other neighborhoods along the Sales Creek watershed.

Letter 15: Veronica Robles Cultural Center

These comments are supportive of the Project; there are no comments that require direct responses.

Letter 16: Piers Park Sailing Center

Comment 16.1

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.*

Response

See response to Comment 10.1

Comment 16.2

Urban Design/Open Space Network: *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.*

Response

See response to Comment 10.2

Comment 16.3

Sustainability/Green Building: *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.*

Response

Refer to response to Comment 10.5

Comment 16.4

Sustainability/Green Building: *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.*

Response

Refer to response to Comment 10.6

Comment 16.5

Sustainability/Green Building: *I suggest six per building onsite for a minimum of 288 spaces.*

Response

Refer to response to Comment 10.7

Comment 16.6

Transportation: *The on and off site circulator buses proposed by the developer should be electric.*

Response

Refer to response to Comment 10.8

Comment 16.7

Transportation: *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.

Response

Refer to response to Comment 1.11

Comment 16.8

Summary of Mitigation/Draft Section 61 Findings: *The proponent should exceed the Inclusionary Development Policy and construct 20% inclusionary housing in both the Boston and Revere parcels, with at least 18% on-site and linkage funds to remain in East Boston.*

Response

Refer to the response to Comment 9.1 above.

Comment 16.9

Summary of Mitigation/Draft Section 61 Findings: *The proponent should include additional transit-directed traffic mitigation including a minimum $15m commitment toward the construction of the Blue/Red line connecter for the MBTA.*

Response

Refer to response to Comment 1.2

Comment 16.10

Summary of Mitigation/Draft Section 61 Findings: *The proponent should commit to the creation of a perpetual community benefit fund supported by HYM 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.*

Response

Refer to response to Comment 10.12

Letter 17: New England Salvadoran-American Day Foundation Inc.

These comments are supportive of the Project; there are no comments that require direct responses.

Letter 18: WalkBoston

Comment 18.1

One concern we ask the developer to address with respect to this generously scaled set of pedestrian ways and open spaces is that the play areas along the Active Linear Corridor (with the exception of the block near Waldemar Avenue) are located within blocks intended to be developed not for housing, but office uses, where presumably there will be few children in nearby buildings. As development occurs within the project, the proponents should ascertain if the proposed Active Linear Corridor is located appropriately to serve the intended users who may be living in residences on-site. Active recreational facilities for small children might be more appropriate lining the loop road at the eastern edge of the proposed Common. This route directly serves the three residential areas near the proposed Beachmont Plaza, the Belle Isle Plaza and the Panhandle near Route 1A. This route would strengthen the opportunities for residents to use the Common and its central meeting places as well.

Response

The Project will provide active and passive areas for all ages/demographics. These spaces will be designed and programmed in greater detail to address the evolving needs of the community during the project's buildout and during design development and review. The Proponent will provide a diversity of recreational options throughout the site to satisfy users needs, including providing play areas for children near housing.

Comment 18.2

WalkBoston encourages the proponents to seriously consider a connection to the East Boston Greenway.

Response

Refer to response to Comment 1.5

Comment 18.3

…the proposal adds a new access route for vehicles and shuttle buses to drop off transit-riders from the new development as close as possible to the transit station; this connection appears to be a part of the proposed Belle Isle Plaza. It is a bit unclear how this new connection will meet with existing streets and paths, and the developer, the City of Boston and the MBTA will need to coordinate the proposed new access with the existing street and path layout.

Response

As noted in responses to Comments 2.13 and 2.14, the Proponent looks forward to continuing coordination with City of Boston and MBTA to create exemplary bus and shuttle transit throughout the Master Plan Project site. Particular attention will be given to the design of Belle Isle Plaza as a transit connector and the convenience of connection with Suffolk Downs MBTA station from both new and existing streets and pathways.

Comment 18.4

The proponents include no discussion or description of schools and safe routes to schools. For any students who are attending nearby schools, walking to school should be safe and convenient. The proponents of the project should work with both the City of Boston and the City of Revere to assure safe passage for all students living in Suffolk Downs and using local schools.

WalkBoston suggests additional examination of the role of schools on the walking paths proposed for the development.

Response

While there are no schools proposed as part of the Project, it aims to provide a high-quality pedestrian environment on-site for users of all ages, with generous sidewalks and vegetated buffer strips, pedestrian-scaled blocks and shared use paths along many streets. Highly visible crosswalks will be marked at road crossings, and crossings will be well-lit to enhance pedestrian safety at night. The Project will include a north-south Active Linear Corridor closed to motor vehicle traffic that would provide a convenient, high-comfort walking route connecting the adjacent Orient Heights East Boston neighborhood and Boston public schools off-site to the south (Manassah E. Bradley School at 110 Beachview Road and Curtis Guide Elementary School at 195 Leyden Street). The Winthrop Avenue edge of the Project Site to the north would consist of a 12-foot sidewalk adjacent to a two-way separated bike lane. This would extend from the western edge of the Project Site along Winthrop Avenue to Washburn Avenue in Revere.

Off-site, proposed traffic signal upgrades planned within Boston for the Bennington Street/Saratoga Street and Bennington Street/Neptune Road intersections, as well as along Route 1A at Boardman Street and Tomasello Drive (a new proposed signal) will enhance pedestrian safety and accessibility but are not directly related to school access to and from the Project Site.

Off-site, pedestrian safety improvements are planned at traffic signals within Revere along the northern edge of the Project Site, which aim to enhance pedestrian accessibility into Revere neighborhoods. Winthrop Avenue traffic signals at North Shore Road, Tomasello Way and Bennington Street will all be substantially upgraded with accessible pedestrian curb ramps and traffic signals. A new traffic signal with pedestrian crossing will be provided between the Winthrop/Revere Beach Parkway

and Winthrop/Washburn intersections. Additional improvements are planned for the Winthrop/Route 16 intersection, and Route 1A at Furlong Drive. These proposed traffic signal improvements will enhance pedestrian safety and accessibility crossing from the Project Site into Revere neighborhoods to the north, west and east, including Garfield Elementary/Middle School and Beachmont Veterans Memorial School/SeaCoast High School to the north and northeast of the Project Site, respectively

Comment 18.5

WalkBoston has significant concerns about the proponent's plans for the Route 1A corridor. Adding a third vehicular travel lane in each direction and increasing roadway capacity from 2,100 to 3,300 vehicles in each direction – an increase of 57 percent – threatens to undermine the ambitious transit-oriented development goals the proponent expresses elsewhere in the proposal. Increased vehicular traffic will also mean more greenhouse gas emissions and more risks to pedestrian and bicyclist safety. We question the need for more vehicular travel lanes on Route 1A between Furlong Drive and Boardman Street, as most southbound traffic on Route 1A will likely access and exit the project site via Route 145/Winthrop Avenue, rather than the proposed "super street" corridor. Similarly, because of the extensive footprint of the Tomasello Drive intersection with Route 1A, we assume that the proponents are anticipating that most of the northbound Route 1A traffic into the site will enter via Tomasello Drive and exit via the same intersection.

Response

Refer to response to Comment 1.4.

Comment 18.6

Instead of the "super street" concept, we encourage the proponents to reconsider Route 1A as a truly multimodal transportation corridor, with no new travel lanes except those built as dedicated pull-offs for buses on both the northbound and the southbound sides of Route 1A. This will further advance the proponent's vision for transit-oriented development, while also maintaining space for protected pedestrian facilities in the median of Route 1A. Dedicated bus pull-out lanes also provide for increased bus service. As part of such a plan, the proponent should commit to improved bus stop facilities along Route 1A, including benches and shelters. Pull-outs for bus lanes and bus stop facilities should be considered for replacement of the existing unsafe bus stops at Furlong Drive, the jug handle at the tank farm, Tomasello Drive and Boardman Street.

Response

The superstreet concept is no longer the preferred alternative for traffic mitigation. Refer to response to Comment 1.4 for additional detail on the proposed improvements to Route 1A.

The Proponent is actively working with the MBTA and MassDOT on evaluating bus facility enhancements in the vicinity of the Project Site and surrounding area. One of the proposals, incorporating the MBTA Better Bus proposals, seeks to reduce the number of commuter/express buses that use Route 1A by rerouting those services to connect to the Blue Line, with the expectation that transit passengers will have better travel times to downtown Boston.

Comment 18.7

Pedestrians from both Waldemar Avenue and Suffolk Downs are affected in a dramatic way by this proposal, which would add a bus stop island for northbound buses on Route 1A, a pedestrian island between the travel lanes for traffic exiting the site onto Route 1A, and a right-turning slip lane for traffic entering the site from Route 1A. We encourage the project proponents to also consider a more conventional T design for this intersection, similar to what exists now.

Response

Recent design iterations have included a concept that does redesign the Route 1A and Tomasello Drive intersection to a more traditional T intersection. The location of stops and specific bus treatments will depend on the layout of the preferred alternative and available right of way. The Proponent will continue working with the Transportation Working Group to refine the design. Refer to response to Comment 1.4 for additional information on the proposed improvements to Route 1A

Comment 18.8

Under the proposed new configuration, most pedestrians will approach the intersection on the south side of Tomasello Drive, as that is the path that connects to the residential areas in the "Panhandle" of Suffolk Downs, as well as the homes in Orient Heights. The bus stop on the Suffolk Downs side of Route 1A would be located directly adjacent to the Tomasello Drive exit lanes onto Route 1A. Getting to the bus stop would require passengers to cross the right-turning slip lane from Route 1A to reach the bus stop island. The crossing of the slip lane is likely to be more dangerous for pedestrians than other crossings, as traffic entering the site may not be stopped by the Route 1A signals. This should get more attention in final designs; one option would be to install a signal protecting pedestrians and a crosswalk.

Response

Refer to response to Comment 1.4 for additional information on the proposed improvements to Route 1A.

Comment 18.9

Pedestrians crossing Route 1A are primarily bus passengers using southbound Route 1A bus services. They, too, are required to cross the potentially dangerous slip lane

from Route 1A into Tomasello Drive, along with the southbound lane that serves traffic exiting from Tomasello Drive… Designers of the traffic flow for this intersection must consider the possibility that walkers cannot cross without a median break that affords refuge and safety for pedestrians who cannot cross in one signal phase.

Response

Refer to response to Comment 1.4 for additional information on the proposed improvements to Route 1A.

Comment 18.10

We encourage the proponents to provide more detailed plans in the FEIR for pedestrian and bicycle improvements at the same locations and intersections they are prioritizing for offsite traffic mitigation.

Response

Offsite mitigation plans will be advanced in the FEIR and will include additional detail on pedestrian and bicycle improvements to the extent possible based on available information.

Letter 19: GreenRoots

Comment 19.1

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.

We recognize the challenges of performing enhanced outreach in EJ communities and are more than willing to work with the City and the Project Proponent to assist in whatever way that we are able and is appropriate. That being said it is our opinion that at this point in the process the outreach to EJ communities has been inadequate.

Response

The Proponent has conducted outreach to EJ communities surrounding the Project Site, including non-English speaking. For the EENF/EPNF, the Proponent provided a Spanish interpreter at public meetings held on the Master Plan Project. Also, the Proponent also held two meetings with a Latino Business Owners Group from East Boston, which meetings also had a Spanish Interpreter providing translation of the presentation and the Proponent's answers to questions asked by the audience. Additionally, as required by the BPDA, the Proponent developed an Executive Summary of the DEIR/DPIR in Spanish and, in coordination with the BPDA, the Proponent held a public meeting on the DPIR in Spanish.

For the current PDA public review, all of the PDA Documents were translated into Spanish and posted on the BPDA's website for public review. Like with the DPIR, a Spanish-speaking meeting was held on the draft PDA Documents to solicit comments/input from the local non-English speaking community. The Proponent will continue to work with the community and area stakeholders and appreciates Greenroot's support with that outreach.

Comment 19.2

While some of these improvements could indeed be done for low cost, we highly doubt that this quantity of money is enough to realize all of these projects. It is unclear whether the projects would be aided by State funds or whether only a subset of these projects will be prioritized and realized. We would ask MassDOT for a detailed analysis of these projects from both a logistical/financial point of view (is this enough money for this list of projects?), as well as from a regional transportation point of view which would put these projects within the context of the State's existing long-term plans for the transportation infrastructure of this region. From the City we would expect a similar report from the Boston Transportation Department (BTD) in regards to the local traffic improvements.

Response

Both the DEIR/DPIR and MEPA RRAI filings included a comprehensive transportation mitigation program, which is currently being updated/refined based on the revised CTPS model results based on Program B and feedback from the bi-weekly Transportation Working Group meetings.

Comment 19.3

Of the various roadway projects proposed, the Route 1A improvements are particularly of interest, as it's not clear how or if the new alignment is possible or would work in the manner described. We would like to see an analysis of the proposal from MassDOT with a focus on both the practicalities of squeezing in two more lanes on this stretch of road, as well as the financial burden this would represent.

Response

Refer to response to Comment 1.4

Comment 19.4

We would like to see a better analysis of the current rider experience and whether this falls on the proponent or MBTA, these data need to be collected by an independent third-party.

Response

Refer to response to Comment 1.11

Comment 19.5

…we would advocate for an expansion of the MBTA bus network to include the development, as well as an improvement of the system in the immediate area in terms of reliability and headways, in order to provide a viable alternative to cars for those both within the development and the neighboring communities.

Response

Refer to response to Comment 1.8

Comment 19.6

In addition to the proposed connections to East Boston it is strongly recommended that the Proponent work with other municipalities and the State to ensure safe and efficient bicycle access to Revere and Chelsea as it is through those routes that many low-income workers at the site are likely to be traversing.

Response

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. In addition, the Proponent will design and construct cycle track or shared use path connection along Walley Street from the southeastern corner of the Project Site to Bennington Street. This will provide for an effective crossing to the east side of Bennington Street to connect to the future extension of the East Boston Greenway as it is conceptually envisioned.

Ongoing discussions with MassDOT are under way regarding provision of bicycle access along Route 1A to the south of the Project Site access at Tomasello Way. If bicycle accommodation is included, this would link part way between the Project Site and the Chelsea Street Bridge.

Comment 19.7

Clearly lacking in this DPIR is an analysis of the impact of this development on the local real estate market, including the impacts on low income residents of this EJ community, as well as recommendations for mitigation of these impacts… The Project Proponent should look at the effect of this project on the market pressures in the surrounding communities (and we would suggest that this study should include Revere and Chelsea, as well as East Boston).

Response

The Master Plan Project, given its location at an existing horse racing facility will not displace existing residents. Conversely, it will strengthen the surrounding communities by providing 10,000 new residential units helping the cities of Boston and Revere meet their housing goals. Refer to the response to Comment 9.1 above for additional information on the Project's affordable housing goals.

Comment 19.8

The Project Proponent has mentioned the possibility of some spaces being available for community use (and obviously the privately-managed open space is the center piece of the proposed public benefit for the community) however the description in the DPIR is limited to:

- *Civic spaces such as an outdoor performance space (when the public Open Space area is not retaining flood waters), an Innovation Center and public plazas near the T stops,*
- *Some historical element capturing the racing history of the site (either within elements of the open space or in a local museum – which one is not mentioned),*
- *Working with BPDA on integrating civic/community space.*

Who would be responsible for the programming, where the money for this would come from, long term sustainability/viability of these uses are all questions still and we hope will be elaborated upon in far more detail in upcoming reports. We would recommend working with local institutions such as the East Boston CDC and NOAH in terms of identifying mechanisms for the long term sustainability of civic institutions occupying spaces in the community (the Proponent could look at long-lived and strong examples such as Meridian House, Atlantic Works, Zumix, etc.).

Response

Refer to response to Comment RSI.3.

Comment 19.9

…we would wish to express our concern about the increasing proliferation of "privately owned public space" (POPS) as the increasing privatization/commercialization of public space is a phenomenon that is experienced quite differently by different segments of the population. Until a greater equity and socio-economic accessibility analysis is performed on the effect of POPS in the urban environment, there is a risk that we are meeting our public space needs with a mechanism that may not be as answerable to the public as a publicly owned space would be.

Response

The Proponent has committed to providing 25 percent per publicly-accessible open space at Suffolk Downs. Though privately operated and maintained, the open space will be open and accessible to the entire population both within Suffolk Downs and the surrounding area.

Comment 19.10

Given the long time frame of this project and the scale of its impacts, we should expect that the project will not only start with the state of the art of what is available in Green Buildings and sustainability, but will continually upgrade its commitments in this area during the construction period as technologies and best practices advance. The City should be requiring that this project remain at the forefront of sustainability as it develops rather than setting static goals that will be surpassed in during the build-out of the project… Towards that end we would like to see the entire site consist of LEED Platinum buildings.

Response

The increased commitments made in the November 2018 RRAI, far exceed the current regulatory requirements for energy performance, GHG emissions reduction and LEED performance. These commitments recognize that over the length of the Project, requirements will change and therefore increased commitments from the current regulatory structure were made. LEED similarly is a rating system that changes over time as the rating system updates it does so with increasing stringency to continue to be at the forefront of green buildings. The Proponent has committed to demonstrate LEED certifiability current with the rating system version or versions that are available at the time.

Letter 20: Mystic River Watershed Association

Comment 20.1

Connections to Belle Isle Marsh*: We understand that the MBTA Blue Line lies in between the project site and Belle Isle Marsh, limiting opportunities for both pedestrian connections and opportunities for the marsh to migrate inland. We recommend providing clear signage and wayfinding through the Suffolk Downs and Beachmont Blue Line stations to link proposed pedestrian pathways with those in the marsh.*

Response

The Proponent will design and implement a limited wayfinding strategy to be incorporated into preliminary design for the shared use path between the East Boston Greenway at Constitution Beach State Reserve, Belle Isle Marsh Reserve, and Revere Beach State Reserve.

Wayfinding within Beachmont or Suffolk Downs Stations may be contemplated with the refurbishment/redesign of those stations.

Comment 20.2

***Design Excellence**: We suggest that the developer recruit and select an array of architectural firms through a competitive RFP process to ensure that the development doesn't feel generic and monotonous but rather provides visual interest and cutting-edge designs that set a new standard for the region.*

Response

The Proponent is committed to design excellence. An RFP process has been developed and will be continued for projects within the Master Plan Project. Urban design and development criteria are established for each block as it is being contemplated. A selective process is then undertaken to review design proposals from competing designers based on these criteria. Particular attention is focused on those landmark developments which will give authentic character to the Master Plan Project.

Comment 20.3

***Supporting Local Nonprofits**: we appreciate the commitment to providing 10% of the retail space to local companies at an affordable rate. We think more could be done to bring the community and local culture into the development. This could include free and/or discounted spaces for local nonprofits and community groups in the proposed community spaces. A great example of this is the Society of Arts and Crafts located in the community space at 100 Pier 4, South Boston as part of the Chapter 91 requirement.*

Response

Refer to response to Comment RSI.3.

Comment 20.4

Rather than suggest a ratio of LEED ratings, this development should seek to be carbon neutral, in line with Boston's 2050 goal. As certification is pursued for each building, we believe there should be points for Renewable Energy Production (Energy and Atmosphere) and Protect or Restore Habitat (Sustainable Sites) as these demonstrate an investment in natural systems.

Response

Since the filing of the DEIR/DPIR, the Proponent expanded their commitment to on-site renewable energy. This was demonstrated in the MEPA RRAI filed in November 2018, which included the installation of at least 2MW of solar PV throughout the

Project Site. Where these systems will be installed, LEED credits and points will be achieved as applicable to contribute to the overall certification level.

The MEPA RAAI also increased commitments for energy efficiency to include a commitment to build all 22 Townhomes and all 12 single family homes as E+ or Passive House equivalent as well as a commitment to build a multi-family residential Passive House demonstration project of at least 50,000 square feet. The full suite of increased commitments demonstrate a comprehensive strategy and the Proponent's commitment for GHG emissions reduction now and over the lifespan of the Master Plan Project.

Comment 20.5

However, given the ecological significance to the Sales Creek area, we ask for the customary 100-foot buffer zone to be maintained for Sales Creek to help protect Belle Isle Marsh. Both Sales Creek and Belle Isle Marsh, are part of the Rumney Marshes ACEC that has been characterized by the U.S. Fish and Wildlife Service as "one of the most biologically significant estuaries in Massachusetts north of Boston." The area includes approximately 1,000 acres of highly productive saltmarsh, tidal flats, and shallow subtidal channels.

Response

The Proponent recognizes and value the importance of Belle Isle Marsh. The Project has incorporated several measures to ensure that the Marsh is not negatively impacted. Please refer to Response to Comment 12.1 for additional information regarding these measures.

The existing 100-foot buffer zone for Sales Creek on-site is largely comprised of disturbed and/or degraded areas that have been significantly altered by the previous uses on-site. These areas include buildings and pavement, unvegetated areas (race track and fringe areas near roads, parking areas, and the horse barns), and invasive species (largely common reed, *Phragmites australis*).

As presented in the DEIR/DPIR, the Project intends to restore certain currently disturbed or degraded areas closest to Sales Creek, and to remove impervious area within the Riverfront Area to Sales Creek. Creating a more meaningful vegetated/undisturbed buffer zone immediately adjacent to Sales Creek, coupled with the significant interconnected area of proposed open space on the Project Site, which extends beyond the buffer zone, will enhance the Sales Creek riparian corridor and appropriately protect Belle Isle Marsh, while accommodating the necessary building program.

Comment 20.6

Ongoing Transportation Mitigation and Management*: as there are many assumptions that will change as the development is built over 20 years (e.g., trip generation predictions, impact on the MBTA Blue Line), we recommend the creation of*

a multi-jurisdictional working group to decide the most impactful transportation mitigation projects. This could be similar to the Lower Mystic Regional Working Group, but also include a budget for capital and operational needs that funds sustainable transportation (transit, walking and biking and car share/electric vehicles initiatives). This will allow for implementation, not just planning efforts. Development of a Transportation Management Agency that coordinates with surrounding North Shore TMA's would be prudent.

Response

The Proponent is currently participating in a Transportation Working Group that includes MassDOT, MEPA, MBTA, BPDA, BTD, Massport, and the City of Revere. This group includes professionals with experience in all facets of transportation planning and engineering. This group is working together collaboratively to define mitigation solutions to accommodate the transportation needs in the area now and throughout the build out of the site.

The Proponent will also explore the establishment of a TMA specifically for its site that will incorporate its on-site and off-site shuttles. Once established, the Proponent will explore opportunities to expand to other developments and coordinate with other TMAs.

Comment 20.7

Active Transportation: *We applaud proposals to connect the site across Bennington Street to both Belle Isle Marsh and Constitution Beach and encourage the proponent to give similar consideration to Chelsea Creek. The proponent's plans to reconstruct Route 1A as a "Super Street" are counter to encouraging access to Chelsea Creek. We encourage the proponent to consider ways that the redesign of Route 1A can include safe and accessible crossings for pedestrians and cyclists to access potential future open space along Chelsea.*

Response

Refer to response to Comment 1.4 for additional information on the proposed improvements to Route 1A.

Comment 20.8

Shuttles: *We understand that the nature of the shuttle system will change over time. Successful elements of the shuttle fleet include being: sustainable, reliable and affordable; comparable in price to the MBTA; electric/clean fuel; and connected to surrounding neighborhoods and other transit modes at off-peak hours. As the proponent rolls this out over the years, we would ask that the shuttle proposal be thoroughly vetted with the community.*

Response

The Proponent is actively working with the City, the MBTA and MassDOT on the evaluation and further refinement of the proposed commitments regarding implementation of new on-site and regional shuttle services. Details of the Proponent's shuttle commitments for the Project will be vetted with all key stakeholders prior to implementation, including the City and impacted communities.

Comment 20.9

Parking: *We understand that the City of Revere is requiring parking ratios for office/lab spaces at twice the ratio the City of Boston proposed for this site. The proponent suggests that meeting Boston's lower parking ratios would be "difficult" but provides no explanation for why this would be difficult in a TOD site uniquely served by existing transit. We would ask that this office/lab space ratio be revisited to see if there is a way to cut down on parking so as to not incentive more single-occupancy vehicle use.*

Included in the proposed 15,250 parking spaces are 557 on-street parking spaces which the proponent identifies as free time-limited spaces. We would ask that the developer explore the idea of metering these spaces to provide local revenue and encourage greater parking turnover rates.

Response

Refer to response to Comment 1.23

Comment 20.10

We encourage HYM to keep up with the latest climate projections even after permitting has been secured.

Response

The Proponent will consider updated climate change projections as they become available during the construction of the Master Plan Project.

Comment 20.11

We note that the DEIR appeared to contain some confusion between stormwater versus coastal flooding (for example, Appendix B, Page 7, E-1: "A large portion of the site will be designated as…sea level rise storage"). Bordering lands subject to stormwater flooding require compensatory flood storage on site. Stormwater flooding, even when extreme, is of finite volume with opportunities to store and release it slowly. Strategies to prevent stormwater flooding on one property—especially through elevating a site—may well increase flooding elsewhere. The proposal to send stormwater to Chelsea Creek, not Sales Creek is a good way to manage stormwater with a neutral to positive impact on neighbors.

Conversely, lands subject to coastal flowage (e.g., water coming in through Belle Isle Marsh) don't require on-site flood storage because coastal saltwater flooding is essentially of infinite volume and is not storable. Preventing coastal flooding requires barriers (including tide gates) of effective height to keep out ocean water. This project should have no inherent impact on coastal flooding of its neighbors.

We strongly support the recommendation that HYM contribute to a larger regional coastal flood barrier, rather than be required to complete a barrier that only protects its own site.

Response

The Proponent, in DEIR/DPIR Appendix B, Page 7, E-1, was not intending to define the benefits of flood storage in Bordering Land Subject to Flooding vs. Land Subject to Coastal Storm Flowage. Rather it was noting the Project will provide flood storage and this flood storage would be a benefit during a severe weather events in Project's complex coastal and riverine environment. The DEIR/DPIR Chapter 8, *Climate Change Resiliency*, and Appendix F provides additional information and detail on the Master Plan Project area's complex coastal and riverine environment.

The Proponent is proposing to send more stormwater to Chelsea Creek rather than Sales Creek which was a change identified in the DEIR/DPIR from its original ENF/PNF filings. This shift of stormwater benefits the Sales Creek watershed by reducing the peak amount of run-off through that watershed and should also have ecological benefits to the Belle Isle salt water marsh by reducing the amount of fresh water into that area.

The Proponent is not proposing a site-only barrier and has not been requested to provide a barrier that protects only the Project Site. Rather the Proponent has committed to a feasibility study of a regional barrier along Bennington Street between the Beachmont and Orient Heights neighborhood which would provide protection to those two neighborhoods and other upstream neighborhoods, Bennington Street, the two MBTA Blue Line Stations, the Blue Line tracks as well as the Project Site.

Comment 20.12

…although the project is unlikely to affect the adjacent Irving Oil Terminal on Chelsea Creek, we are concerned that a severe coastal storm could damage the fuel tanks and spill oil into Chelsea Creek and the Suffolk Downs site. HYM and its public and private neighbors have a strong interest in ensuring that the Irving Oil Terminal is prepared for the more extreme coastal storms predicted by climate change.

Response

Refer to response to Comment 12.4

Comment 20.13

Given the project site's susceptibility to coastal flooding, we urge proponents to elevate finished floor elevations to closer to 24 feet BCB through additional terracing between street level and their entrances.

Response

As discussed in the DEIR/DPIR, a key resiliency measure for the Project is designing the proposed building at a finished floor elevation in accordance with the BPDA Sea Level Rise Design Flood Elevations ("SLR-DFE"), where feasible. The BPDA SLR-DFE is comprised of hydraulic modeling results (which includes 40-inches of sea level rise, and 2.5-inches of subsidence) and freeboard (12-inches for non-critical and 24-inches for critical buildings).

Comment 20.14

Including extra high first floor ceilings also provide opportunities to raise first floor elevations in the future.

Response

The Master Plan Project has been specifically designed with sea level rise as an underlying assumption, and considerations of potential future inundation as first principles. That is, the Master Plan Project is designed as *"resilient by design"* rather than depending on adaptation in the future. Nonetheless, buildings in commercial areas will feature generous first floor ceiling heights for the commercial and community gathering spaces which enliven the street frontage.

Comment 20.15

HYM could and should similarly issue RFPs with energy efficiency, design and resiliency standards for each building to take advantage of Boston-area design excellence in creating a highly-desirable, immediately exemplary neighborhood.

Response

The Proponent has committed to construct a 50,000-square foot demonstration Passive House multi-family building as well as 12 Passive House or energy positive single-family homes and 22 Passive House or energy positive townhouses.

Comment 20.16

The NECASC precipitation data represent averages; Suffolk Downs is likely to experience the most damage from intense cloudbursts such as Hurricane Michael and Harvey brought North Carolina and Texas. HYM's stormwater strategy needs to include a "fail quickly-fail cheaply" strategy for intense rainfall events that exceed design parameters.

Response

Adaptability to future climate change and increased precipitation events has been considered in the stormwater management system master plan design. The functionality of the stormwater management system has been evaluated during increased intensity storms, using the Northeast Regional Climate Center ("NRCC") six-hour, 100-year storm event of 5.65 inches. This evaluation demonstrated that the stormwater management system will function as intended. During this extreme storm event, minor puddling and some limited flooding would be expected within the roadways as the stormwater conveyance system will not be able to convey the runoff instantaneously.

The Central Common includes an additional volume that can be utilized for flood storage for the Sales Creek watershed system, during significant storm events. To provide a higher layer of resiliency to the overall Project and enable the Project Site to better adapt to the future effects of climate change, this volume has been largely dedicated to flood storage for the Sales Creek watershed system, as opposed to being used for stormwater detention.

Comment 20.17

Summer heat in Greater Boston is already increasing to levels beyond historical norms. Climate Ready Boston projections indicate that Boston could experience Washington, DC's climate by mid-century and Birmingham, AL's climate by late century. Landscape designs should include more water and shade elements than historic New England norms.

Response

The open space design will continue to plan for climate change. In addition to planning for water and shade elements, the Proponent is considering other elements like tree planting as a key measure to reducing climate impact. Refer to Figure 17. To reduce urban heat island effect, the Project team is utilizing tree planting, maximizing vegetated surfaces, and specifying high albedo surfaces. Tree species will be carefully selected to include coastally adapted and salt tolerant species, drought tolerant and water tolerant species, and species resistant to pest damage.

Comment 20.18

We were glad to see project proponents go beyond regulatory requirements in considering heat effects (that said, local regulations regarding heat mitigation strategies are quite limited). Some recommendations:

- *Include not only light pavement, but also white roofs;*
- *Incorporate interactive water elements such as the Greenway's ring fountain and mist tents to help children and adults cool off;*

› *Make sure bike/pedestrian paths are shaded so they continue to be used during heat waves.*

Response

The Proponent will incorporate the items noted above into the planning. Water play elements are proposed at Belle Isle Square and Beachmont Square, and water continue to exist at Sales Creek and Horseshoe Pond. Shade over walking and biking paths will also be a priority.

Comment 20.19

Since heavy metals are transported to water bodies via stormwater, we ask that the stormwater management plan address heavy metals.

Response

Runoff from impervious area is typically the most significant source of heavy metals in urban runoff. Common heavy metals found in stormwater runoff include copper, lead, zinc and cadmium. These metals wash into urban stormwater runoff from tires, automobile exhausts, road asphalt, fuel combustion, parking dust, and recreational land. Most pollutants in runoff, including heavy metals, are in particulate form, or, are bound to particulates and tend to settle out of the water column and accumulate in sediments.

Due to the sensitive nature of the surrounding watershed the stormwater management system will be designed with a robust treatment plan. To date the main stormwater BMPs have been strategically located and conceptually planned to ensure that the Master Plan Project reserves ample space for stormwater management. As the design progresses, more decentralized aesthetic stormwater facilities may also be incorporated to enhance the landscape in addition to providing additional stormwater treatment and mitigation.

The stormwater management system will be designed to treat the first 1.0-inch of runoff from the Project Site. This will be achieved through several treatment trains using a variety of BMPs. Tree filters, detention basins, subsurface infiltrations, and proprietary water quality units are some of the BMPs that will be included. All of these BMPs have been proven to reduce heavy metals in runoff.

Runoff reduction is also a successful strategy to reduce pollutant discharge in stormwater. Several measures have been employed to reduce the overall runoff discharged from the site, these include reducing impervious area, through efficient site design and designating 20 percent of the roof areas to be green roofs, infiltrating runoff where feasible, and targeting of re-using or retaining the first 1.0-inch of runoff on-site.

A Site Owner's Manual will be developed for the stormwater management system that will outline the source control and pollution prevention measures and

maintenance requirements of the stormwater BMPs associated with the Master Plan Project. Measures such as regular street sweeping will be specified to help further reduce the overall pollutant load in the runoff. The operation and maintenance measure specified will help ensure that the stormwater management system will function as intended in the long term.

2.1 Responses to Public Comments by Topic

Because many of the comments from the members of the public expressed a similar array of concerns global responses are provided by topic below. The public comments and concerns fall into the following key categories:

1. Affordable housing;
2. Construction related impacts (noise, air quality, traffic, etc.) to abutters on Waldemar Avenue;
3. Building height and density;
4. Traffic; and
5. Impacts on local resources and services (e.g., emergency services, school capacity, etc.).

The responses below aim to address key community issues and refer to specific sections of the DEIR/DPIR for further information. Copies of all public comments received are provided in Appendix C for reference.

Comment Theme 1: Affordable Housing

Example comments

"[HYM] should continue to work toward developing lower cost and affordable options beyond the 13% dedicated affordable. In particular, they should consider a range of lower cost, lower amenity options such as micro units, rooming houses, and other alternative/flexible living arrangements to provide lower rent market options for a broader range of users. Moreover, they should commit to increase the amount of handicap accessible units throughout their development."

"Development of this neighborhood needs to happen with MORE AFFORDABLE HOUSING UNITS at an income level that is actually affordable."

Response

The Proponent will comply with the Mayor's Inclusionary Development Policy housing program, under the Mayor's Order Relative of Inclusionary Development dated December 9, 2015 (the "IDP") and has set aside 13 percent of the total number of housing units within the Boston portion of the Site as affordable units. Pursuant to a Master Affordable Housing Agreement to be entered into by the Proponent and the BPDA with respect to the master Plan Project, which is described

in the draft PDA Documents (accessible via the web links provided in Appendix A), the owner of each residential building shall enter into a separate Affordable Housing Agreement with the BPDA. The IDP requirements respecting affordable housing units may be satisfied entirely on-site, or subject to the approval of the BPDA may be redistributed to other buildings within the Suffolk Downs Site or to an off-site location. In total this is anticipated to create approximately 930 new affordable housing units proposed to be located on-site.

Also, the Proponent is proposing a broad mix of housing types including apartments, condominiums and senior housing. Within those housing types the Proponent is also providing a variety of unit types, including microunits, studios, one-bedroom, two-bedroom and three-bedroom units. It should be noted that the Proponent's commitments respecting affordable housing applies to all residential units in the Boston portion of the Project Site, including those with apartments, condominiums and senior housing units.

In addition, the Proponent has agreed to enter into a non-discrimination covenant binding on future owners that prohibits discrimination based on race, creed, color, sex, sexual preference, disability, religion or national origin.

The Proponent is also continuing to explore potential additional opportunities to create affordable housing in other East Boston neighborhoods in connection with the Master Plan Project.

Comment Theme 2: Construction-related Impacts

Example comments

"We will be directly impacted with noise, air pollution, traffic etc.,… [Waldemar Ave residents] are directly affected more than the rest of the community who do not live on this street. "

"Concern of lead pain & dust to the Waldemar ave., direct abutters… Mitigation to/for the direct abutters of the project as it affects Waldemar Ave homes"

Response

Construction impacts are temporary in nature and are typically related to air (dust), noise, and stormwater runoff. Temporary construction-period impacts will be managed to minimize disruption to the surrounding neighborhoods. Construction Management Plans ("CMPs") will be prepared for each phase of the Master Plan Project to address temporary construction-related impacts. A draft CMP for the Master Plan Project based on conceptual construction logistics scenario for each phase was presented in Appendix G of the DEIR/DPIR. As each phase of development progresses through design and into the construction phase, the respective construction managers will refine and expand the respective CMPs in order to address sub-phases and reflect the input of the regulatory authorities having jurisdiction over CMPs.

The Proponent will meet with local officials and community stakeholders, as needed, during the development and implementation of the CMPs to address specific local concerns. The CMPs to be developed for each phase of development will detail overall construction schedule, work hours, number of construction workers, worker transportation and parking, and number of construction vehicles and routes. Additional information on construction-related impacts was provided in DEIR/DPIR Chapter 9, *Environmental Protection*.

Comment Theme 3: Building Height and Density

Example comments

"My first major concern is about the height of many of the taller buildings and the density of the project overall. As we have been told, the Suffolk Downs project is one (?) of the largest development projects in the history of the city and the immensity of the project has become apparent. Although it appears that HYM is working to think carefully about this and balance many competing voices, I feel it would be important to consider reducing the height of buildings as they are immense in comparison to the neighborhoods around them."

"… I see that there are mini Harbor Tower Buildings that have been proposed along this street. I do not want these tall buildings in the front of my property."

"This project is far too large for the parcel and the surrounding area. In addition to this project there are over 330 units proposed for the area between Addison Street and Swift Street. This scale of development such a small area is entirely too dense."

Response

The height and massing strategy for the Master Plan Project has been developed keeping in mind the scale of adjacent neighborhoods and transitions, to allow for access to sunlight to public spaces, creating appropriately scaled development and maximizing views for all buildings while creating privacy. Given the proximity of Logan Airport, the height strategy also responds to FAA height limitations.

As described in Section 1.2 of Chapter 1, *Project Overview and Supplemental Information*, the Proponent and project team have further refined the proposed conceptual master plan site plan and building massing approach to be responsive to the community's comments on building height. Specifically, the Project has been modified in the following ways:

- Proposed an Orient Heights Transition Zone along the southernmost portion of the Project Site, which zone is subject to special restrictions respecting height and proposed uses, for the protection of the Orient Heights neighborhood, as further detailed in the PDA Documents
- Incorporated reduced building height zones along the southern edge of the Project Site closer to the Orient heights neighborhood and pushed taller building elements further away from the neighborhood. Refer to Figures 1.10a and 1.10b.

- Refined the blocks along the Waldemar Avenue edge between Orient Heights and the Parkway to be further broken down into two rows instead of a single row creating diversity in building height and typology with addition of the mid-level building scale between the townhomes and larger multi-family homes. These changes are illustrated in Figures 1.11a and 1.11b.
- Converting the townhomes previously proposed along Waldemar Avenue to single family homes to better match the existing homes along Waldemar Avenue.

Comment Theme 4: Traffic

Example comments

"I would also ask that we consider the impact of more traffic at the intersection of Waldemar and Bennington Street. People are also concerned about the traffic at the rotary intersection of Saratoga and Boardman Street."

"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…."

"The roads can't handle the current traffic. And even if, as the developers and their attorneys falsely assert, residents won't have cars the MBTA can't handle rush hour now. There has been, and it appears there won't be, any investment in infrastructure. As a result the community is grid locked almost 24/7 with no concern being given to the quality of life of existing and new residents."

"The existing infrastructure cannot handle the current vehicle traffic. The MBTA Blue Line is unable to currently cope with morning and afternoon rush hour."

Response

DEIR/DPIR Chapter 6, *Transportation*, described the traffic mitigation and transportation improvements proposed as part of the Master Plan Project, including extensive roadway improvements to Route 1A and other roadways, a robust transportation demand mitigation program, shuttle bus service serving the Suffolk Downs Blue Line Station, shuttle bus service to off-site locations, and bike-sharing facilities. Consistent with the future review process outlined within PDA Master Plan, the Proponent will continue to work with the City of Boston, MassDOT, DCR, and City of Revere to finalize the details of the traffic mitigation and transportation improvements to be implemented in connection with each phase of the Master Plan Project and will establish a Master TAPA for the Master Plan Project with BTD.

As each phase of the Master Plan Project advances, the Master Transportation Improvement Agreement will require that owners of each building enter into a Transportation Access Plan Agreement ("TAPA") which specifies the transportation demand management requirements for each building. The Master TAPA is also anticipated to require the Proponent to provide annual monitoring including traffic monitoring, transit ridership and occupancy monitoring as appropriate for assessing

traffic and transit impacts of the Master Plan Project. If the amount of traffic generated by the Master Plan Project exceeds the amount of traffic evaluated at full-build in the DEIR/DPIR, the Proponent will work with the City of Boston to implement additional transportation demand management efforts to reduce the amount of vehicular traffic traveling to/from the Project Site.

Comment Theme 5: Impacts on Local Resources and Services

Example comments

"I am concerned about the impact of such a large project on the local resources, especially emergency services and the schools. Although we have been told that there would be minimal impact on the schools, I would like to see more specific facts and get a sense of how they came up with those numbers."

"While I understand that housing is needed this benefits no one other than the developers and no infrastructure changes or enhancements have been put forward."

Response

To respond to public comments received on the initial joint MEPA/Article 80 filing (the November 30, 2017 EENF/EPNF), the Proponent conducted a comprehensive municipal fiscal impacts assessment for both Boston and Revere for Program A. This assessment compared the cost of municipal services/departments for each new household and/or employment opportunity to the anticipated revenues associated with the Project. The assessment took into consideration new property tax revenues from the development, excise taxes, and local option sales taxes, and nets those revenues against governmental expenses, such as police, fire, public works, and education.

The fiscal impacts assessment concluded that the Project (at full build-out) is expected to generate a positive annual net fiscal impact of approximately $56.8 million annually to Boston after accounting for an estimated annual municipal costs totaling approximately $28.8 million (including approximately $10.3 million in annual police costs, $6.2 million in annual fire costs, and $4.3 million in annual school costs). As such the proposed Master Plan Project will generate more revenues than costs.[2,3,4]

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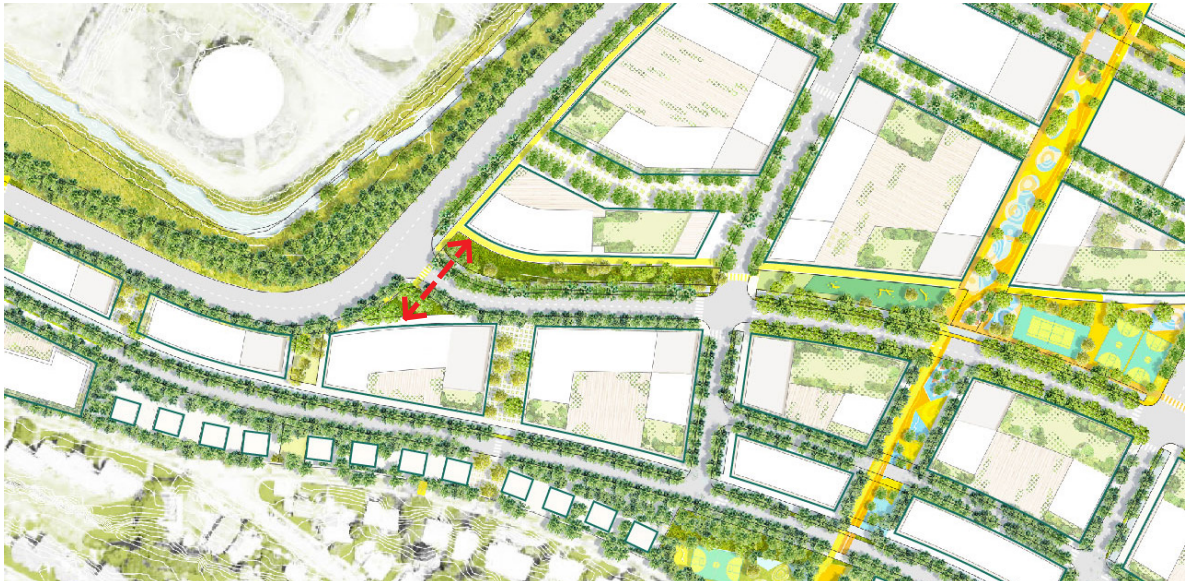
[2] Estimated property values for future development are based on current rates and not projections.

[3] Fiscal impacts do not include existing property taxes associated with the Suffolk Downs property and net out estimated municipal costs associated with the Master Plan Project, including police/fire, public works, education. Therefore, net fiscal benefits will likely be higher over the life of the Master Plan Project if property values increase more than municipal costs.

[4] The variance is associated with the size of developable land within each municipality and varying assessed property values/rates.

DPIR



Design Updates

Source: cbt

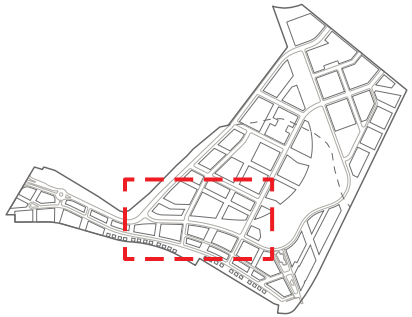


Figure 2.1
Tomasello - Parkway Intersection Plan Comparison

U:\HYMSuffolkDownsMPFS\174001\04_Presentation\08_2019_Boston-Permitting_PDA-Community

Source: cbt

▲ Service, Loading, and Parking Access

Figure 2.2
Service, Loading, and Parking Access Plan

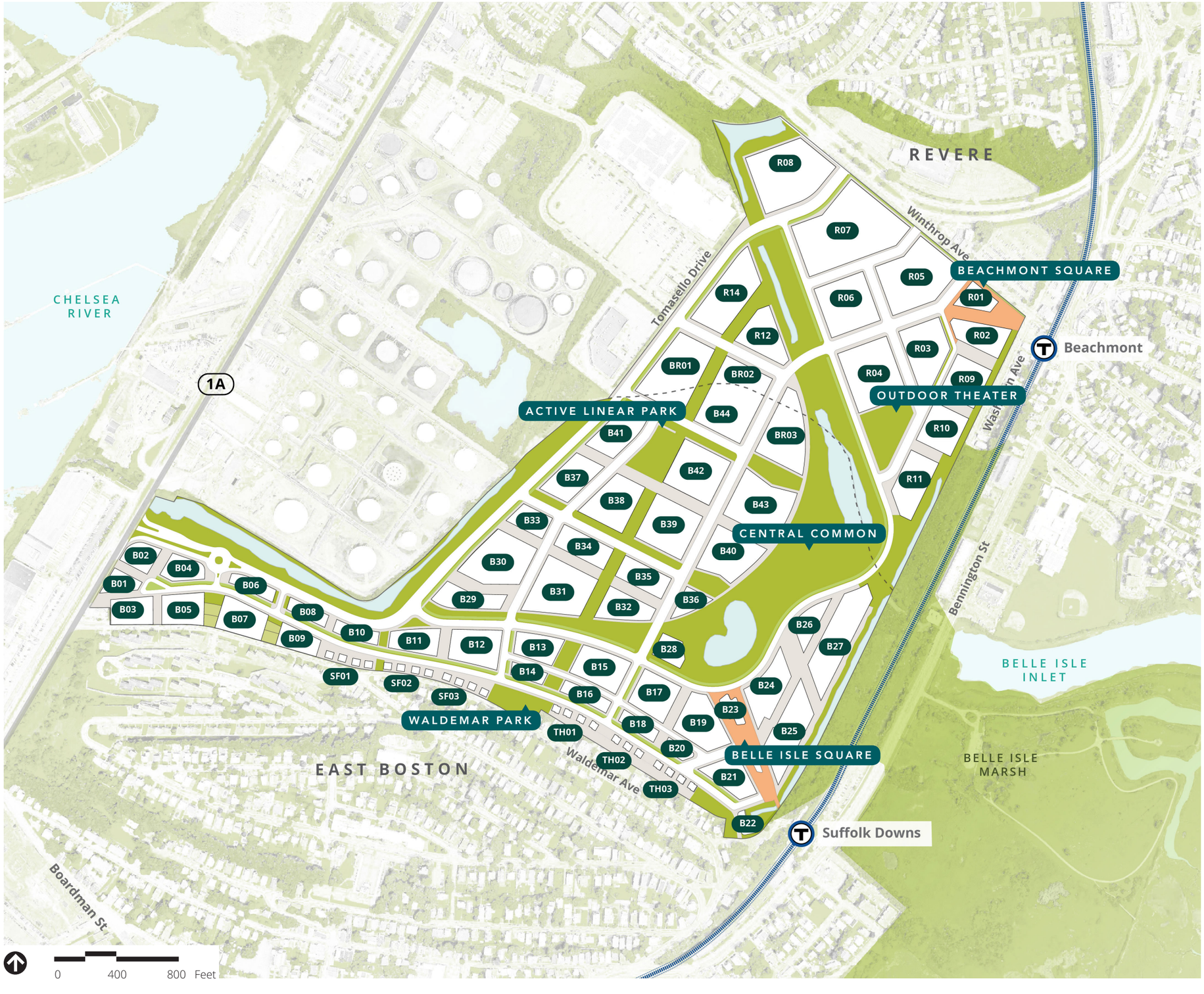
U:\HYMSuffolkDownsMPFS\174001\04_Presentation\08_2019_Boston-Permitting_PDA-Community

Source: cbt

Proposed Lobby Locations

Figure 2.3
Proposed Lobby Location Plan

Suffolk Downs Redevelopment
Boston & Revere, Massachusetts



Open Space in Boston

Central Common	12.00 ac
Active Linear Park	3.00 ac
Belle Isle Square	1.00 ac
Waldemar Park	0.75 ac
Other Open Space	10.25 ac
Total in Boston (25%)	**27 acres**

Open Space in Revere

Central Common	3.25 ac
Outdoor Theater	1.50 ac
Beachmont Square	1.00 ac
Active Linear Park	0.75 ac
Other Open Space	6.5 ac
Total in Revere (25%)	**13 acres**

Total Open Space	**40 acres**

Source: cbt

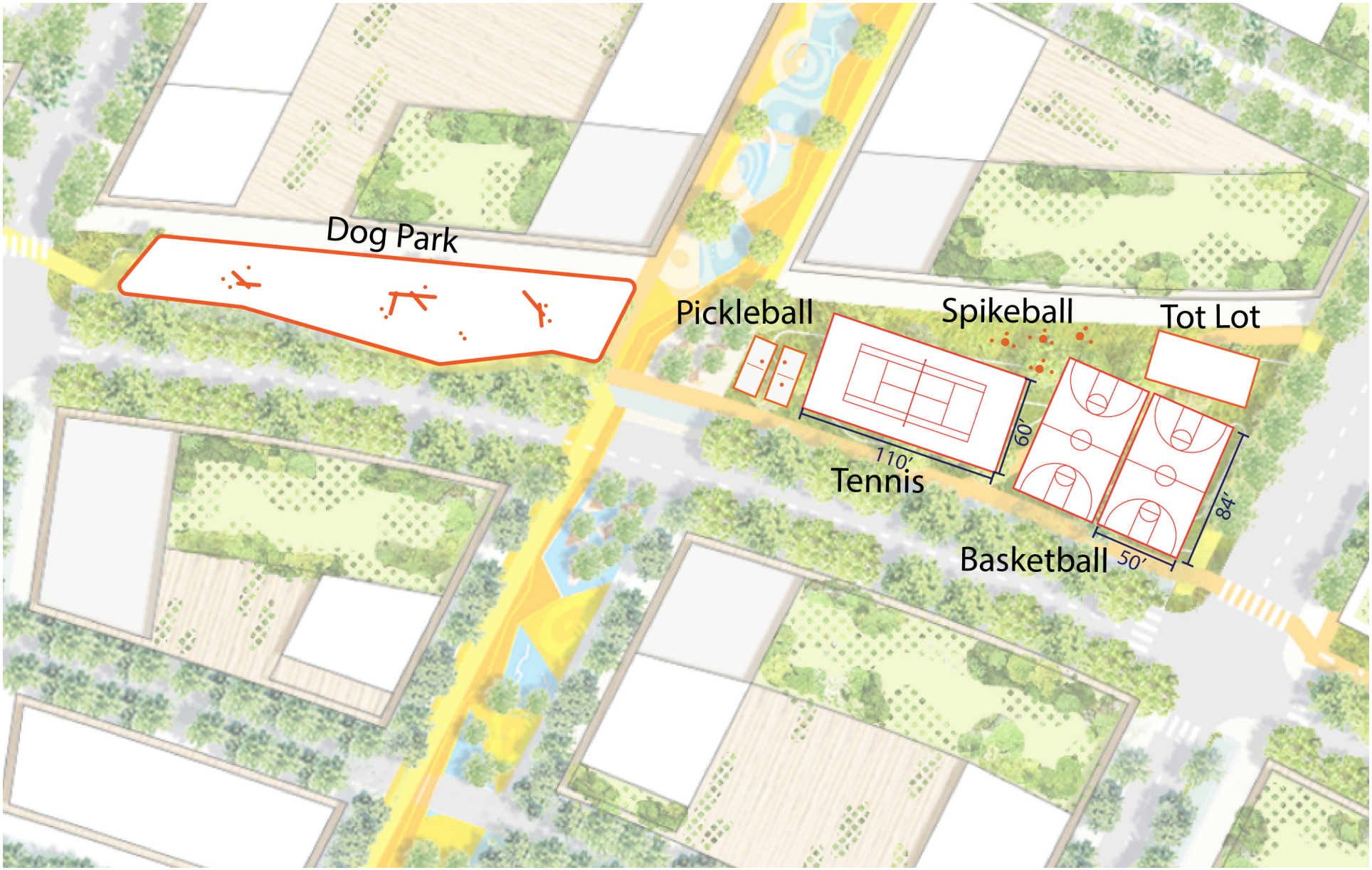
Figure 2.4
Open Space Network Plan

Suffolk Downs Redevelopment
Boston & Revere, Massachusetts

Source: cbt

Figure 2.5
Waldemar Grading Plan

Suffolk Downs Redevelopment
Boston & Revere, Massachusetts



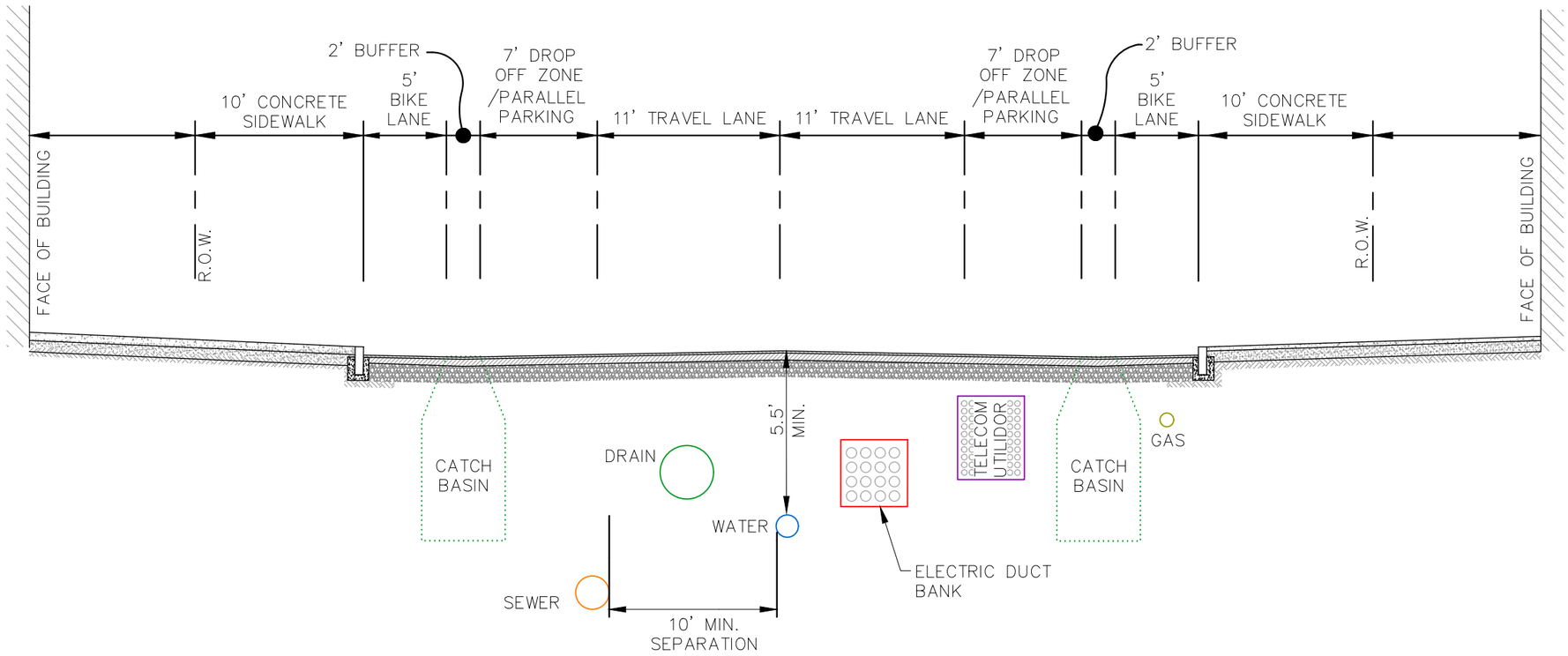
Source: cbt

NOTE: Stated uses are just shown for dimensional purposes.

Specific programming of parks will be determined as each phase goes forward.

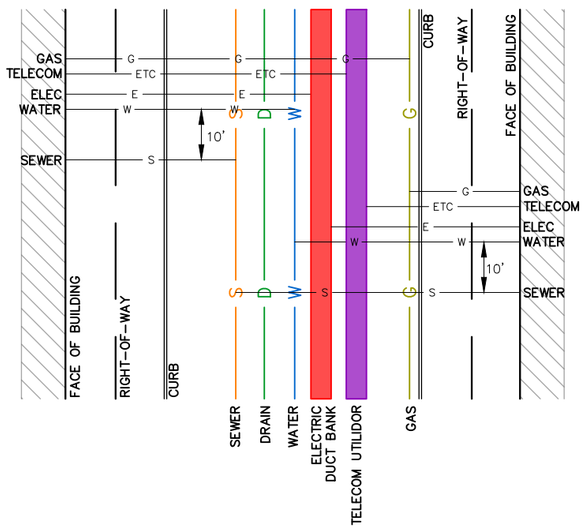
Figure 2.6
Gateway Park Detail Plan

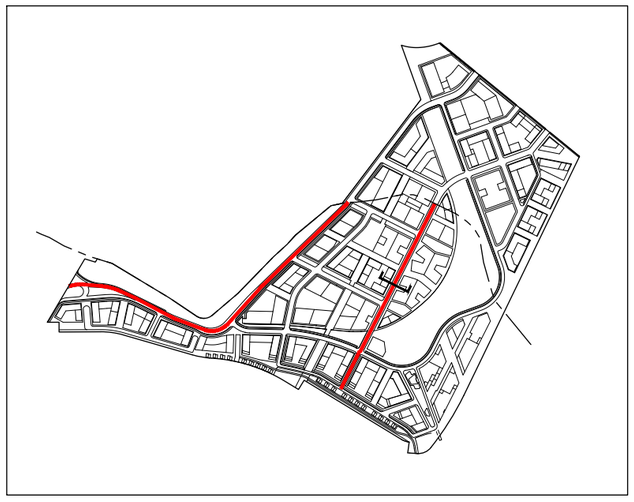
Suffolk Downs Redevelopment
Boston & Revere, Massachusetts



PRIMARY ROADWAY (TYPICAL)

NOT TO SCALE





Key Map

NOT TO SCALE

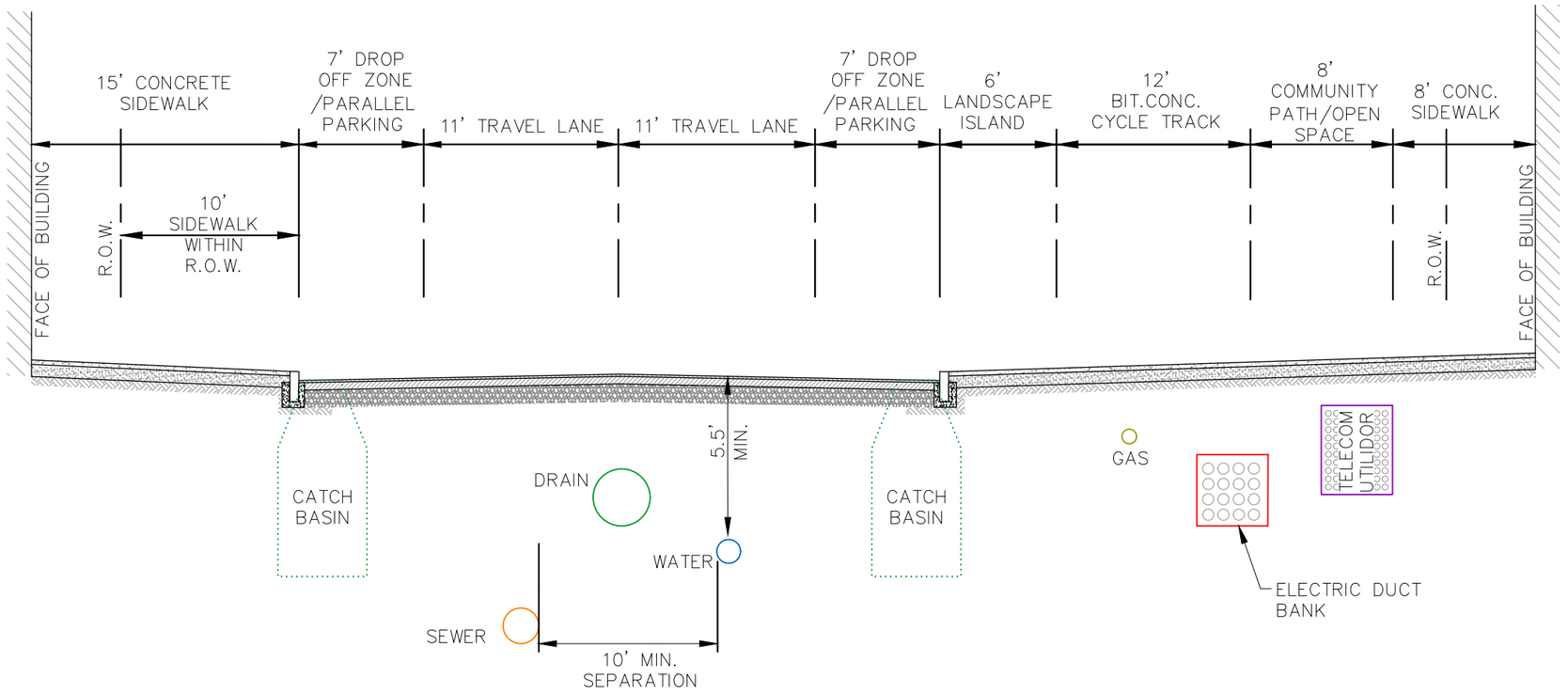
Note:

This cross section is preliminary in nature and subject to change.

Figure 2.7a

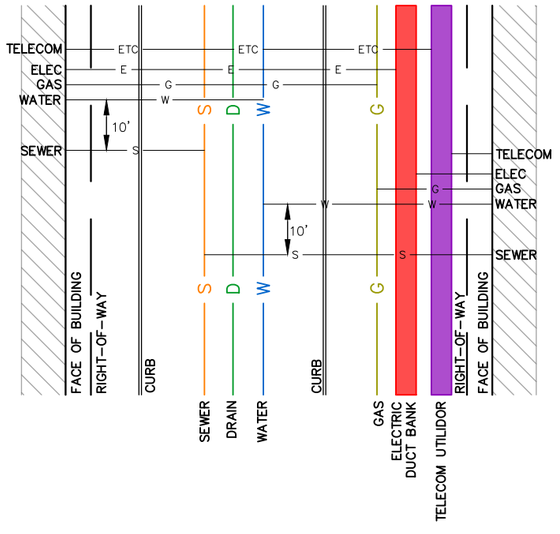
Conceptual Roadway Cross Sections with Utilidor
Typical Primary Roadway (R.O.W. 70' - 80')

Suffolk Downs Redevelopment
Boston, Massachusetts



SECONDARY ROADWAY (TYPICAL)

NOT TO SCALE



Key Map

NOT TO SCALE

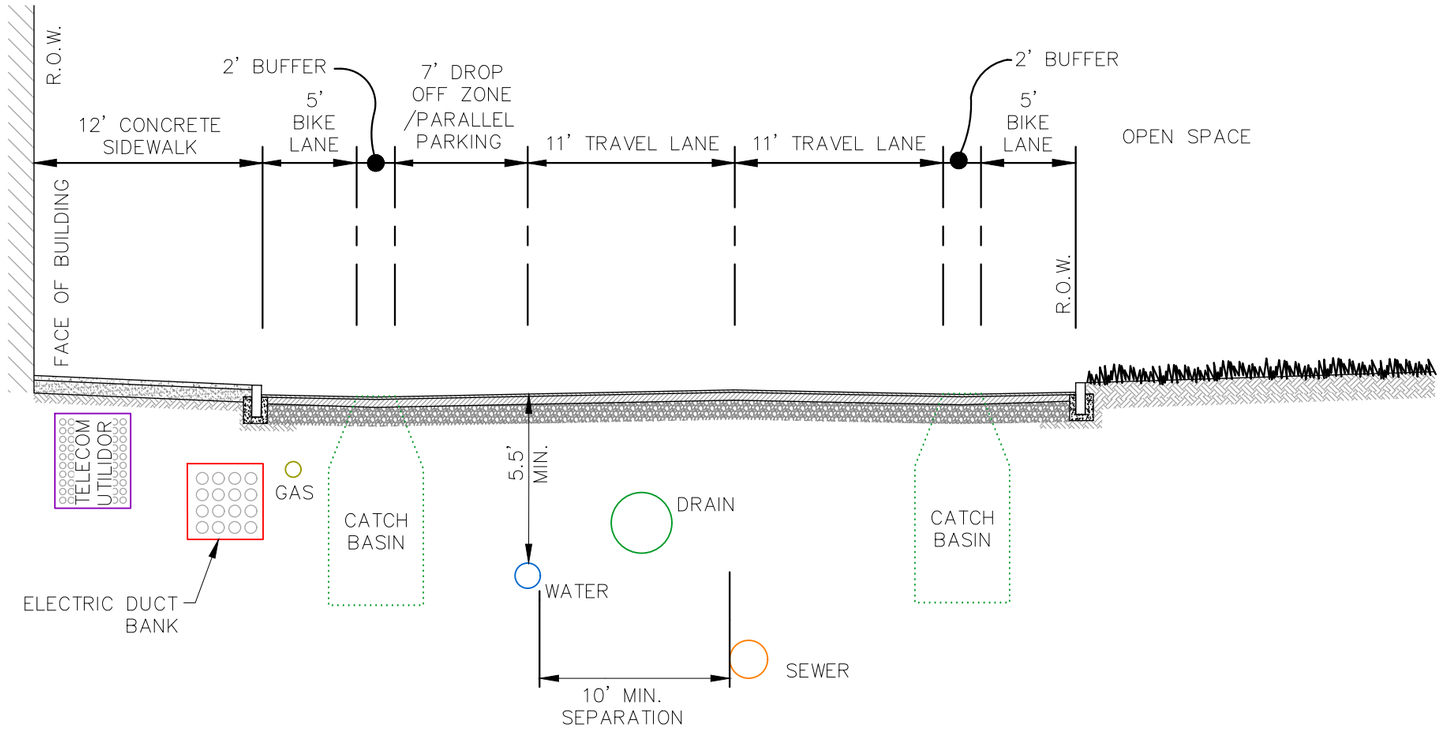
Note:

This cross section is preliminary in nature and subject to change.

Figure 2.7b

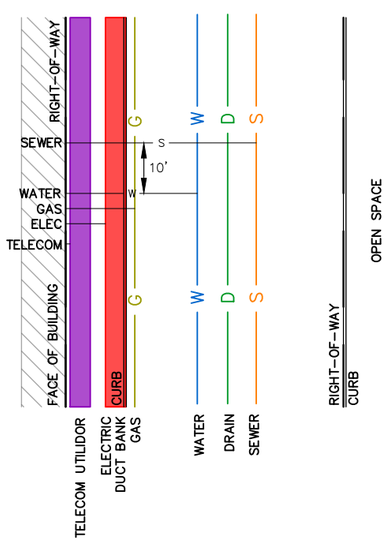
Conceptual Roadway Cross Sections with Utilidor
Typical Secondary Roadway (R.O.W. 60' - 70')

Suffolk Downs Redevelopment
Boston, Massachusetts



TERTIARY ROADWAY (TYPICAL)

NOT TO SCALE



Key Map

NOT TO SCALE

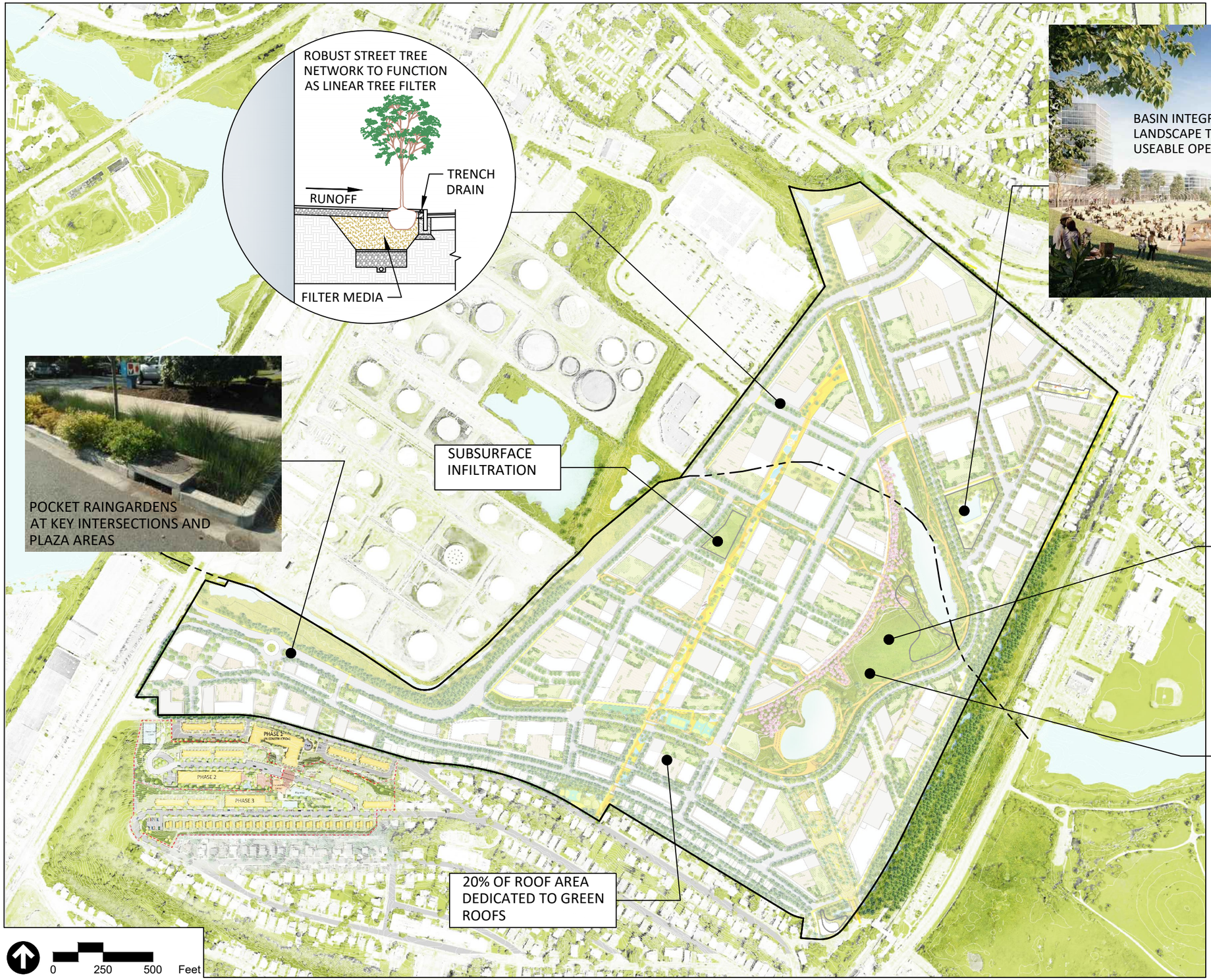
Note:

This cross section is preliminary in nature and subject to change.

Figure 2.7c

Conceptual Roadway Cross Sections with Utilidor
Typical Tertiary Roadway (R.O.W. less than 60')

Suffolk Downs Redevelopment
Boston, Massachusetts



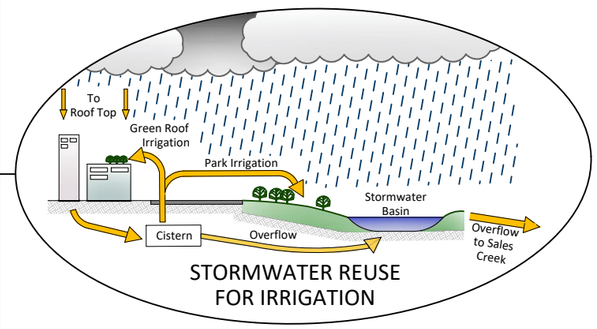
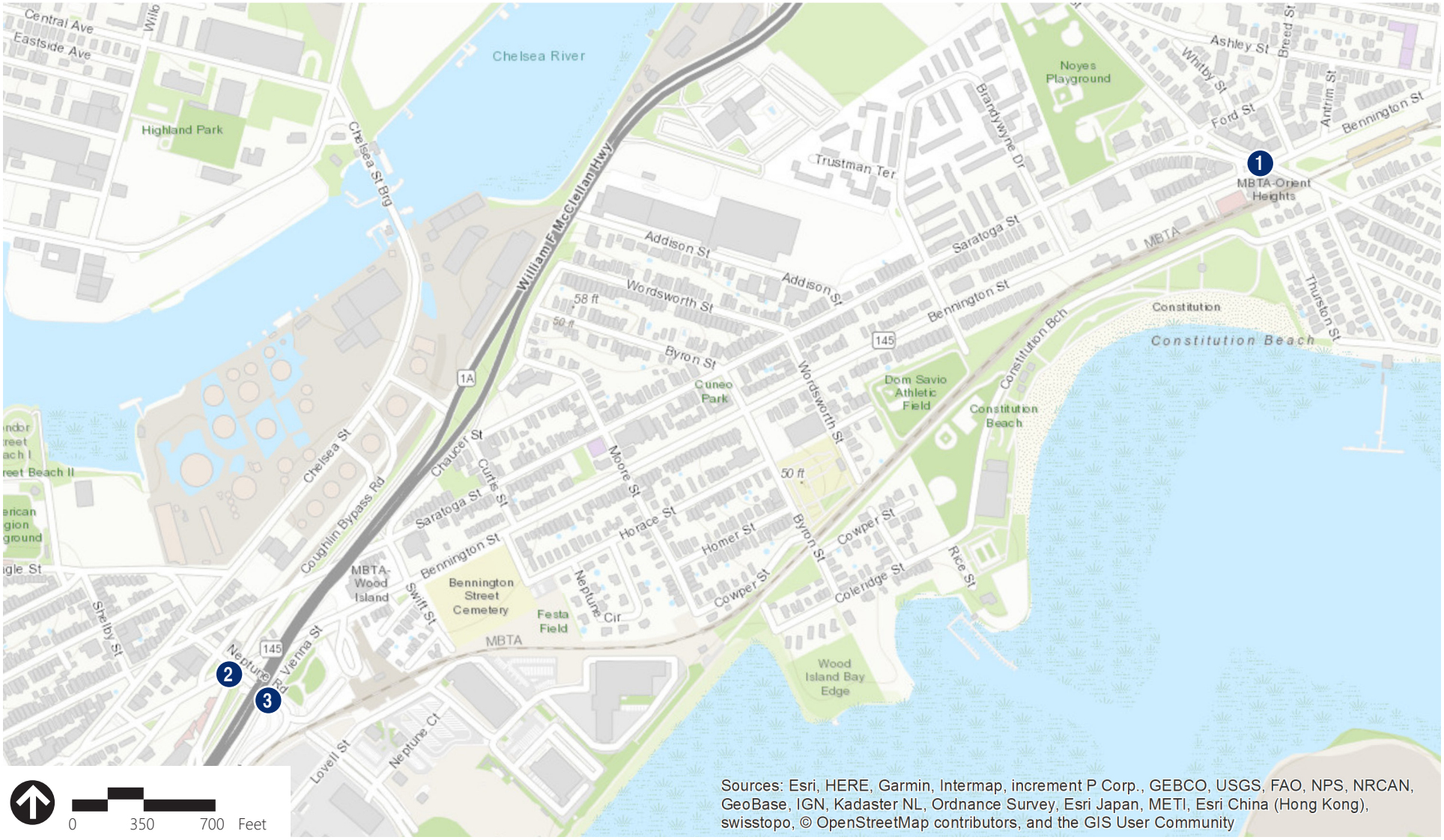


Figure 2.8

Conceptual Green Infrastructure

Suffolk Downs Redevelopment
Boston & Revere, Massachusetts



1. Bennington Street at Saratoga Street
2. Neptune Road at Bennington Street
3. Neptune Road at Vienna Street

Figure 2.9

Potential Adaptive Signal Technology Locations

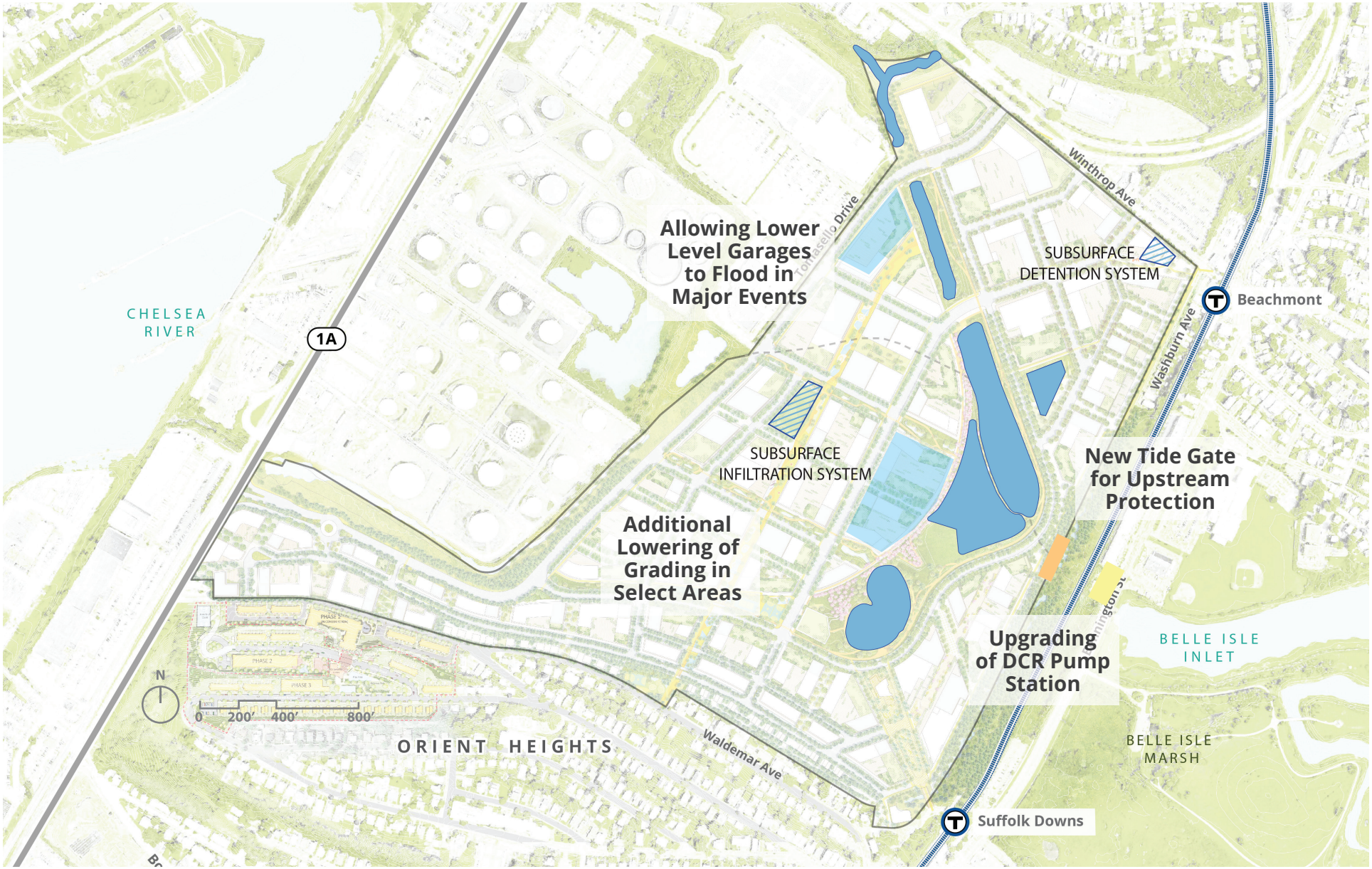
Suffolk Downs Redevelopment
Boston & Revere, Massachusetts

Source: STOSS

Active
Passive
Civic

Figure 2.10
Open Space Calculations - Active, Passive, and Civic

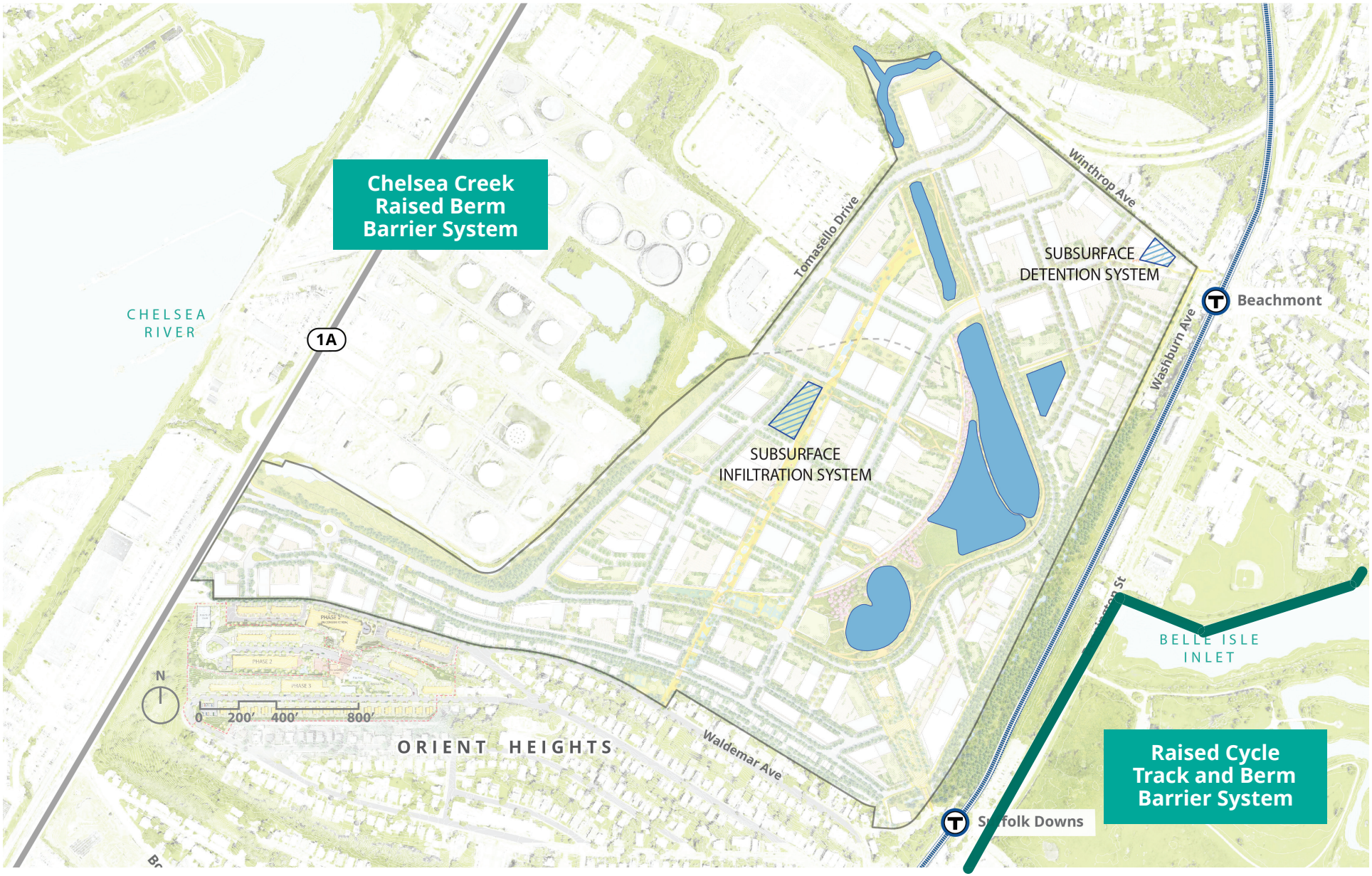
Suffolk Downs Redevelopment
Boston & Revere, Massachusetts



Source: cbt

Figure 2.11a
District-Wide Flood Resilience Strategy 1

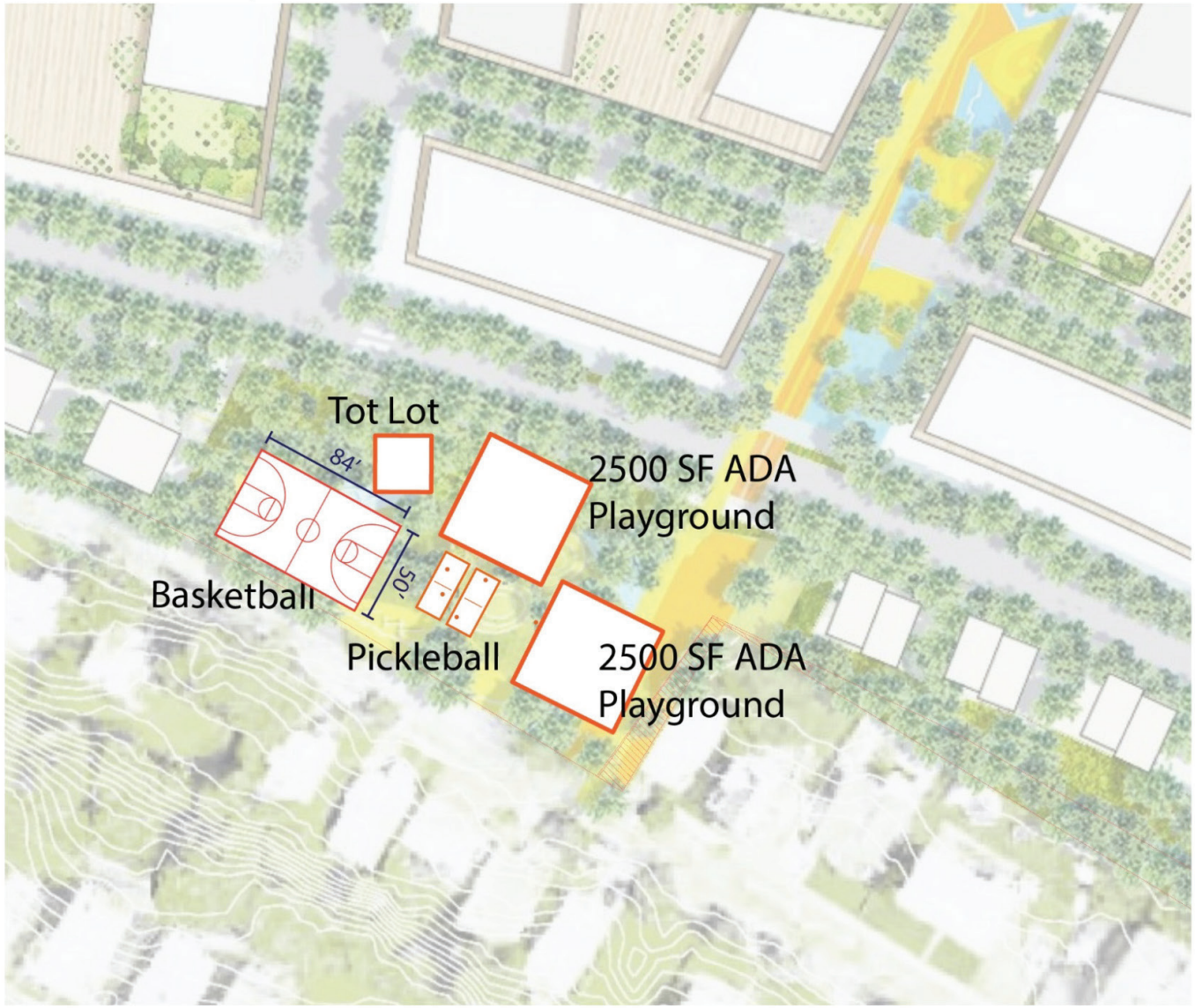
Suffolk Downs Redevelopment
Boston & Revere, Massachusetts



Source: cbt

Figure 2.11b
District-Wide Flood Resilience Strategy 2

Suffolk Downs Redevelopment
Boston & Revere, Massachusetts



Source: STOSS

Please note, this is not the proposed design but rather simply some potential uses to show the scale of the park. Specific design of this park will be coordinated with the City of Boston and Orient Heights Neighborhood and will be presented during future design reviews of the project.

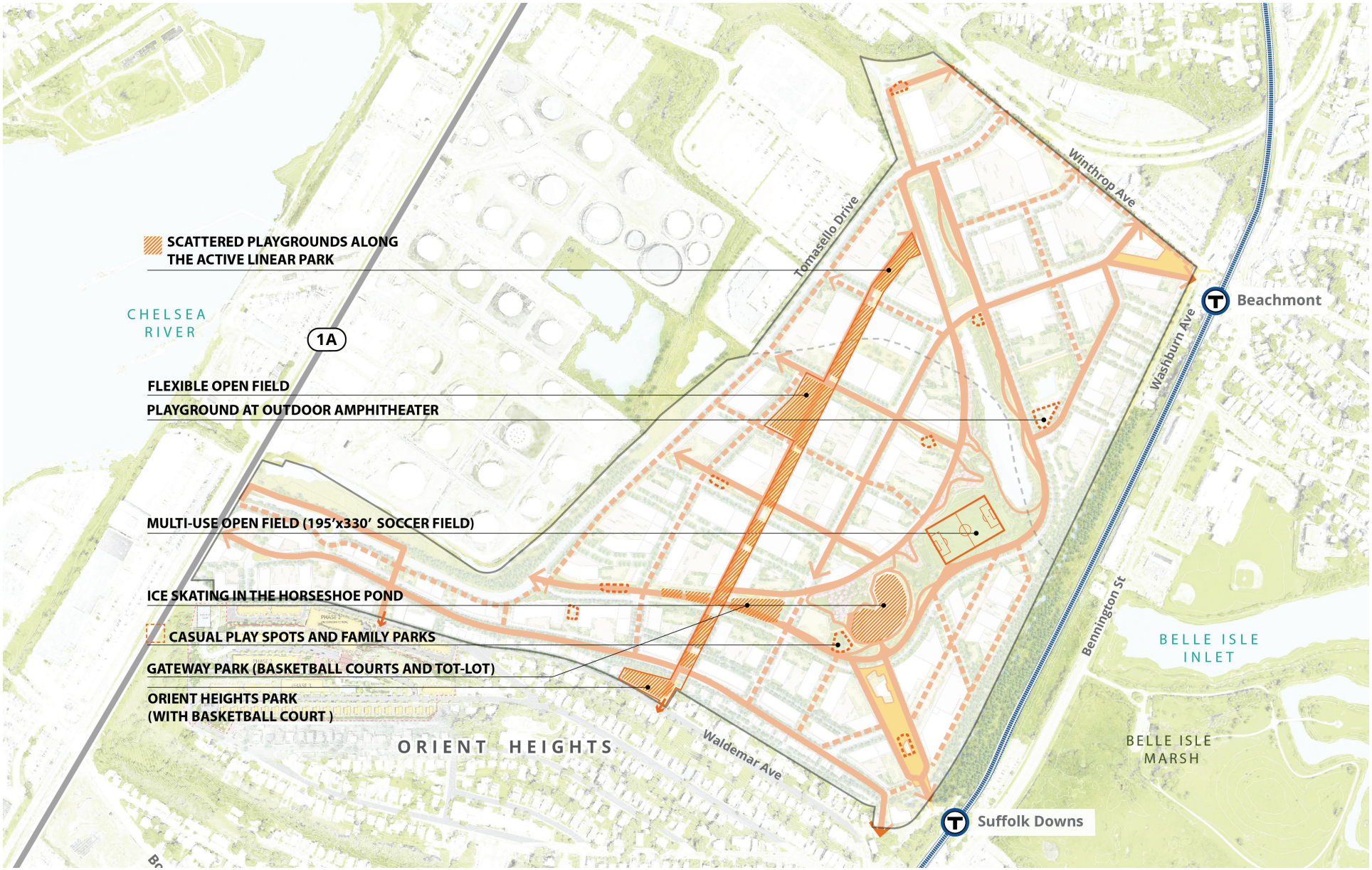
Figure 2.12a
Orient Heights Park Plan

Suffolk Downs Redevelopment
Boston & Revere, Massachusetts

Source: cbt STOSS

Figure 2.12b
Orient Heights Park Rendering

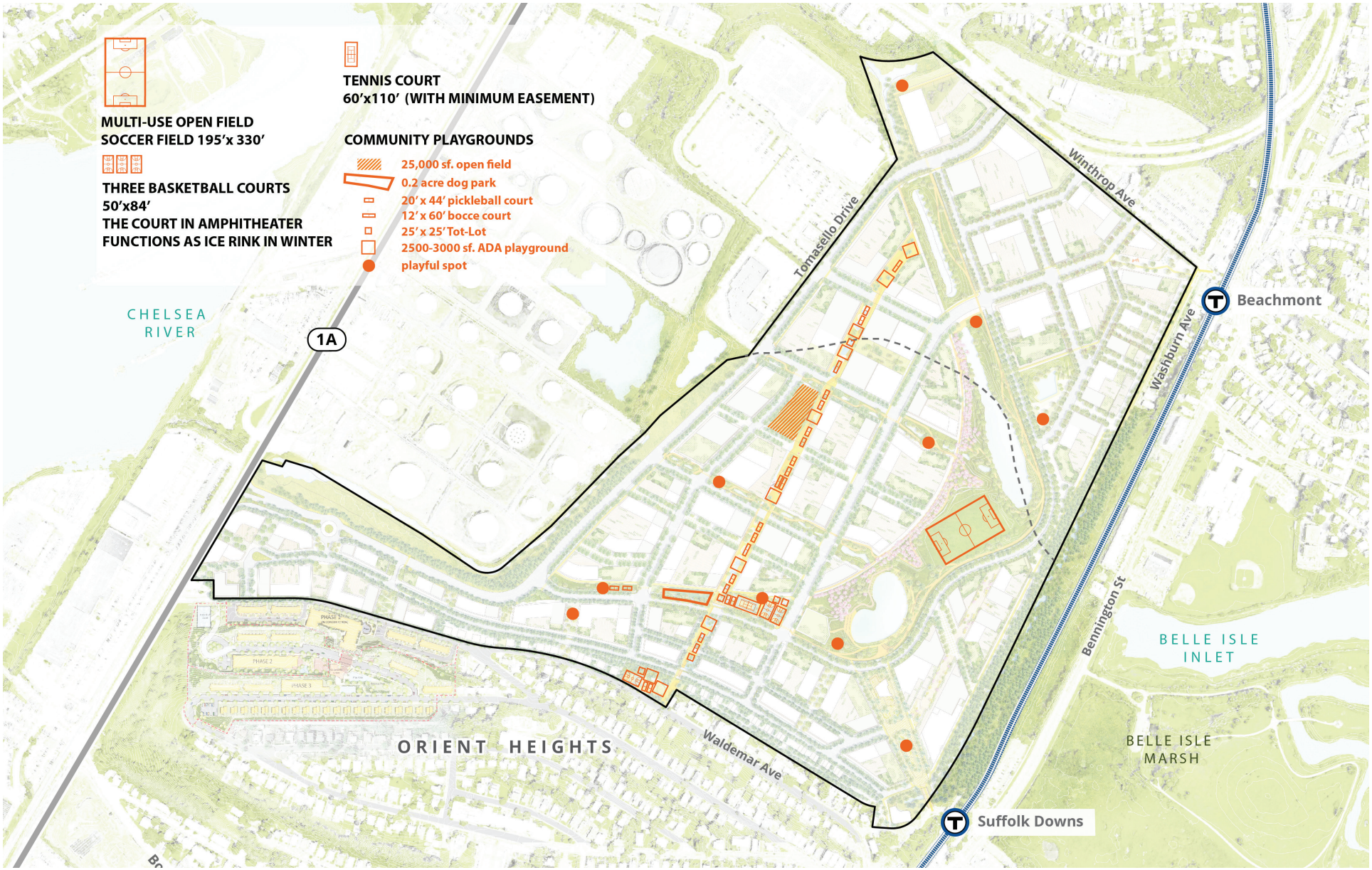
Suffolk Downs Redevelopment
Boston & Revere, Massachusetts



Source: STOSS

Figure 2.13a
Active Recreation

Suffolk Downs Redevelopment
Boston & Revere, Massachusetts



Source: STOSS

Figure 2.13b
Active Recreation Program Fit

Suffolk Downs Redevelopment
Boston & Revere, Massachusetts

HafenCity, Hamburg Germany

Picnicking, Prospect Park, Brooklyn

Circle Rules Football, Prospect Park Brooklyn New York

Youth Events, East Boston

Source: STOSS

Figure 2.14a
Open Space Network | Central Common

Suffolk Downs Redevelopment
Boston & Revere, Massachusetts

Buga 05 Playground, Munich Germany

Free play areas, Safe Zone, Quebec

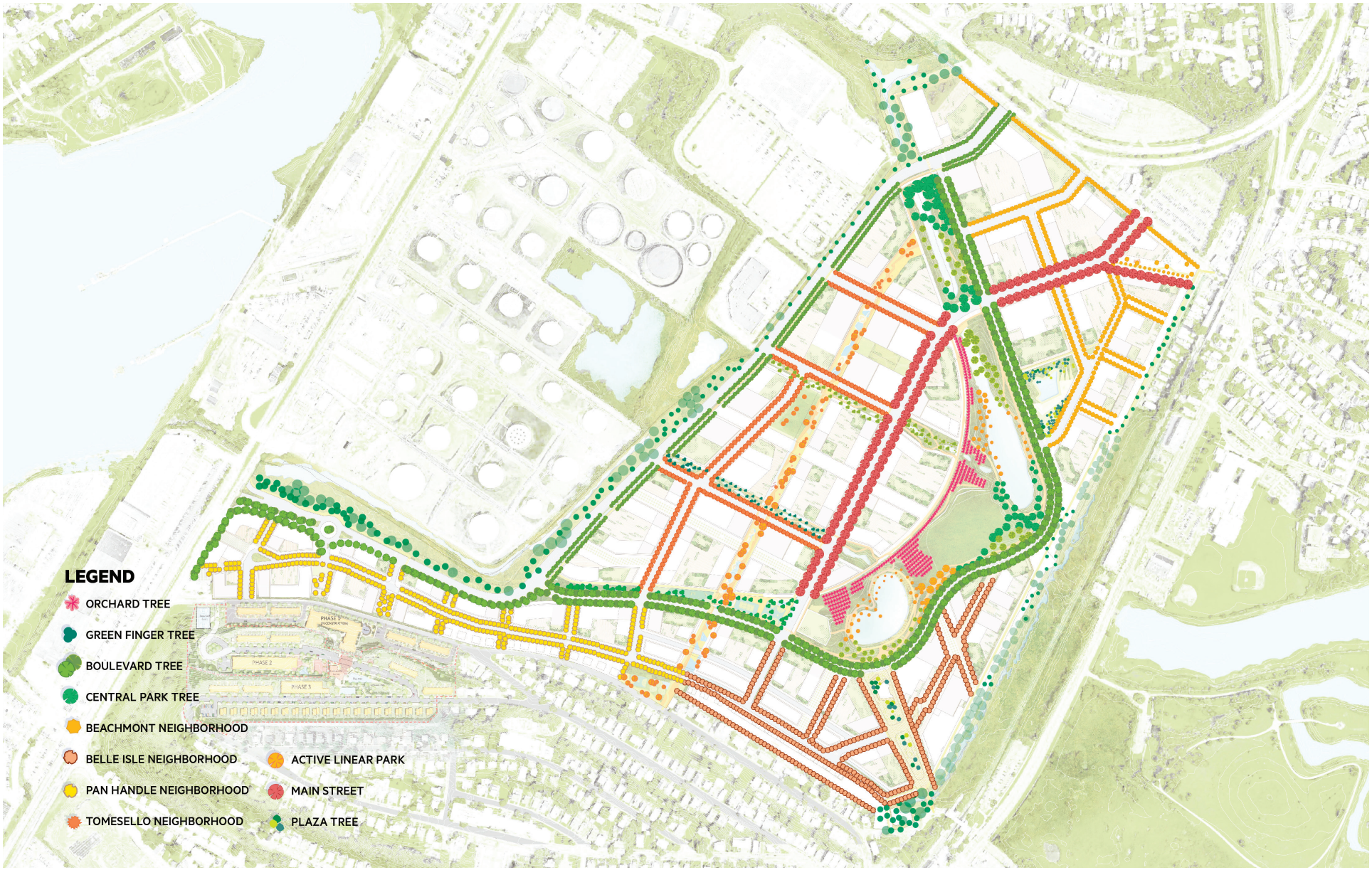
Exercise Equipment

The Goods Line, Sydney Australia

Source: STOSS

Figure 2.14b
Open Space Network | Active Linear Park

Suffolk Downs Redevelopment
Boston & Revere, Massachusetts



Source: SOSS

Figure 2.15
Canopy Strategy Overall

Suffolk Downs Redevelopment
Boston & Revere, Massachusetts

Appendix A: PDA Documents

The PDA Documents are available for review on the BPDA's Project page and may be accessed through the links below:

PDA Master Plan:

http://www.bostonplans.org/getattachment/dc3111e8-3c12-411e-920e-06b483ca6dc3

PDA Development Plans:

http://www.bostonplans.org/getattachment/32bbfabf-0cd6-411f-b722-b679b5f0f729

Appendix B: Agency, Organization and IAG Comments

BOSTON PLANNING & DEVELOPMENT AGENCY

REQUEST FOR SUPPLEMENTAL INFORMATION
SUFFOLK DOWNS

SUBMISSION REQUIREMENTS
FOR SUPPLEMENTAL INFORMATION REQUEST

PROPOSED PROJECT:	SUFFOLK DOWNS
PROJECT SITE:	109 ACRE SITE BOUNDED BY THE CITY OF REVERE, THE MBTA BLUE LINE RIGHT OF WAY, THE ORIENT HEIGHTS NEIGHBORHOOD, AND MASSACHUSETTS ROUTE 1A, EAST BOSTON
PROPONENT:	THE MCCLELLAN HIGHWAY DEVELOPMENT COMPANY, LLC C/O THE HYM INVESTMENT GROUP, LLC
DATE:	FEBRUARY 12, 2019

The Boston Redevelopment Authority ("BRA") d/b/a The Boston Planning & Development Agency ("BPDA") is issuing this Supplemental Information Request in response to the Draft Project Impact Report ("DPIR") which the McClellan Highway Development Company, LLC (the "Proponent") filed for the Suffolk Downs project on October 1, 2018. Notice of the receipt by the BPDA of the PNF was published in the Boston Herald on October 1, 2018, which initiated a public comment period that ended on December 17, 2018.

This document is not a Preliminary Adequacy Determination as we are not requesting a Final Project Impact Report. This document is only requesting that the Proponent provide more details around the information that was submitted in the DPIR and respond to all comments and feedback received during the comment period. When the Proponent files a response to this request we will start a new comment period and continue the public review process. The Proponent may choose to file a response in conjunction with an anticipated Planned Development Area application.

On February 21, 2018, the BPDA issued a Scoping Determination. On October 1, 2018, the Proponent filed a DPIR pursuant to Article 80 Large Project Review. The Proponent proposes 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 development of a new mixed-use neighborhood, a 40-acre publicly accessible open space system, and two retail squares at 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 (the "Proposed Project").

The BPDA hosted publicly advertised community meetings regarding the DPIR on October 2, October 16, October 30, November 13, November 27, and December 11. The BPDA hosted meetings of the Impact Advisory Group ("IAG") on June 12, September 11, October 16, October 30, November 13, December 3, and December 11. The public comment period concluded on December 17, 2018.

Written comments in response to the DPIR from BPDA staff are included in **Appendix A** and must be answered in their entirety. **RSI.1**

Written comments in response to the DPIR received by the BPDA from elected officials, other public agencies, and the general public are included in **Appendix B** and must be answered in their entirety. Appendix B includes comments from: **RSI.2**

- John Sullivan, Boston Water and Sewer Commission
- Carrie Marsh, Boston Parks and Recreation Department
- Zach Wassmouth, Boston Public Works Department

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

- The Proponent should clearly define civic uses that are proposed on the site. The amount of civic uses should be identified in land use tables, and communicated in any diagrams and renderings where civic uses are integrated with building. **RSI.3**

- The Proponent should provide a parcelization diagram. Area calculations including parcel area, gross square footage, ground floor footprint, and floor area ratio ("FAR") must be provided per building. **RSI.4**

- The Proponent should continue to work with BPDA to determine an appropriate average household size estimate for transportation and municipal impact modeling purposes. **RSI.5**

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 development of a new mixed-use neighborhood, a 40-acre publicly

accessible open space system, and two retail squares at 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, 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 filing with supplemental information 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 supplemental 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 filing of supplemental information 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). Section 80B-6 requires the Director of the BPDA to issue a Certification of Compliance indicating the successful completion of the Article 80 development review requirements before the Commissioner of Inspectional Services can issue any building permit for the Proposed Project.

A. REGULATORY CONTROLS AND PERMITS

An updated listing of all anticipated permits or approvals required from other municipal, state or federal agencies, including a proposed application schedule shall be included in the filing. **RSI.6**

A statement on the applicability of the Massachusetts Environmental Policy Act (MEPA) should be provided. If the Proposed Project is subject to MEPA, all required documentation should be provided to the BPDA, including, but not limited to, a copy of the Environmental Notification Form, decisions of the secretary of Environmental Affairs, and the proposed schedule for coordination with BPDA procedure. **RSI.7**

APPENDIX A

COMMENTS FROM BPDA STAFF

MEMORANDUM

To: Tim Czerwienski, Project Manager
From: Boston Transportation Department
BPDA Transportation Planning Staff
Subject: Suffolk Downs DPIR
Transportation Comments

The agencies responsible for reviewing transportation elements of development proposals for the City of Boston have prepared the following response in reference to the proposed development at the Suffolk Downs site in East Boston and the City of Revere. The Boston Transportation Department and BPDA Transportation Planning Staff ("the City") have reviewed this proposal and provided comments throughout the development review process. Additionally, the City has been in coordination meetings with the developer, MassDOT, the MBTA, Massport, and other stakeholders in order to comprehensively evaluate the proposal.

The City is excited to work on this important development and ensure that the transportation improvements proposed help to enhance the multi-modal network and improve safety at the site. Key elements that will require further consultation and review include:

- Improve and update the modeling completed as part of the DPIR and ensuring that modeling accurately reflects the population that will live and work at the site. **1.1**
- Account for transit as a key part of the mitigation package, including analysis to improve resiliency and capacity of the Blue Line, analysis of the Blue-Red Connector, improvements and long-term maintenance of the Suffolk Downs Blue Line Station, timing of transit mitigation, and other key issues. **1.2**
- Commit to a robust publically-accessible shuttle from the site to South Station via the Seaport District, with improvements that could eventually provide an EZ-Ride type service to the project site. **1.3**
- Commit to design and construction of an improved Route 1A and key intersections to accommodate additional and reduce cut-through traffic with a consideration for HOV lanes management. **1.4**
- Expand the bike transportation and site access strategy, including definition of locations of Bluebike Stations on the site and an extension of the East Boston Greenway to the site. **1.5**
- Refine bike lane and cycle track design on site per City and State standards for bikeability. **1.6**

This 16 million square-foot development provides a unique opportunity to grow an area of East Boston that has so far not had any significant density of residential, office, or commercial uses. Identified in Imagine Boston 2030 and Go Boston 2030, this site is of critical interest to the City and the residents of East Boston. Transportation access and improvements, specifically, are key to making this site as successful as it can be. The following comments are in response to the DPIR submitted by the Suffolk Downs developer and also refer back to comments that were not fully addressed or unaddressed in the previously submitted scoping comments.

A. General Considerations

The City has several general areas for consideration associated with this DPIR, which will be outlined in the following section. These areas for consideration are ones that may not fall into a specific category, have not been addressed previously, or are interwoven throughout several other topics.

1.7 **Mode Share:** First, the City believes that the Proponent should consider Go Boston 2030 mode shares in any discussion of mode share with this project. Certain assumptions are made using a CTPS model and a "TOD" model and are discussed further in this response. Generally, the Proponent should call back to Go Boston 2030 goals and how they are helping to reach those goals through mitigation or on-site transportation improvements. Transportation mitigation is generally not considered to include on-site improvements such as bike facilities or roadway design within a site. Mitigation should be discussed as improvements that will directly offset transportation impacts off-site for each mode.

B. Transit

In discussions with the MBTA, MassDOT, and the Proponent, transit has risen to the top as a key mode for accessing this site. Improvements to transit will be crucial to ensuring a successful project, mitigating traffic impact, and encouraging a greater increase in the transit mode share.

1.8 **Modified & Enhanced Bus Service:** Scoping comments from the City asked the Proponent to discuss bus capacity and service enhancements with the MBTA. The DPIR states that the Proponent will monitor this capacity as buildout happens, but no set plan is outlined. In our recent discussions with the MBTA, MassDOT, and the Proponent, enhancing bus service has been a topic of interest. It is important that the Proponent include any findings or commitments in future filings for this proposal.

It is important for the Proponent to respond with concrete reasoning and quantitative results to describe feasibility of the following requests:

1.9 **Local Buses:** Study extending Bus Route #120 or comparable transit/shuttle connection into the heart of the project site and increasing headways to at least every 15 minutes.

Suffolk Downs Station: The Suffolk Downs Station shares a name with this project and as such should be an example for the type of quality development this can be. The proponent should analyze the cost and feasibility of renovating and bringing Suffolk Downs Station up to current code. The analysis should include the potential to establish a public connection to Belle Isle Marsh and fortifying the station against sea level rise. **1.10**

Blue Line: Using the most recent 2018 trip data for the Blue Line, the proponent should estimate the additional ridership the project will generate on the Blue Line and what times of day those impacts will occur. The proponent should also work with MBTA and MassDOT on the methodology for estimating future transit demand. **1.11**

Red-Blue Connector: COB/BPDA scoping comments originally asked for a quantitative analysis of effects of adding the Red-Blue connector at Charles/MGH Station. Such an analysis should be possible given designs that have been advanced by MBTA for studying Red-Blue Connector feasibility. The DPIR only addresses the impacts of the Red-Blue Connector *qualitatively,* declaring that there would be a positive impact without quantification. Further analysis should be conducted to determine the impact on travel times and transit mode share for project trips assuming the Red-Blue connector is in place. **1.12**

Shuttle Services: The Proponent outlined shuttle routes that would operate at as a part of the proposed development TDM plan. These routes included services to South Station, Seaport District, North Station, and Chelsea (Newburyport/Rockport Commuter Rail connection). This shuttle is a response to previous scoping comments from the City about establishing such a service. The City is generally supportive of these shuttle concepts but will require further refinement as a part of this approval process. Key elements will include:

- **Suffolk Downs to Seaport/South Station**: The Suffolk Downs to Seaport/South Station connection is a critical connection for both inbound work trips by site residents and outbound reverse commuting to the site. The Proponent should work with the City to ensure the shuttle that operates between the development site and South Station/Seaport includes the following elements:

    - **Publicly Accessible** - The shuttle should include elements that allow members of the public to access the shuttle such as an onboard fare payment system and/or compatibility with the MBTA's AFC 2.0 system. The shuttle should be branded to clearly identify it as publicly accessible. Additionally, it should meet full ADA Accessibility standards. A comparable program is the EZ Ride shuttle that operates between North Station and Cambridge. **1.13**

    - **Frequency**: The shuttle should operate at ten (10) minute or better headways during peak commuting periods in both directions. This will enable

passengers commuting to and from the site to use this shuttle as a primary means of access. Additionally, the shuttle should operate at least every fifteen (15) minutes off peak during the midday and evening. Operating hours should be extensive and defined in the next development review submission.

- **Stops**: The Proponent should coordinate with the City on Shuttle bus stops. At a minimum, the shuttle should make stops at Bennington Street/Route 1A, Addison Street/Route 1A, Logan Airport, Congress Street (in the vicinity of World Trade Center Station), Summer Street/Melcher Street, and South Station.

1.13 Cont'd

- **Coordination**: The Proponent should commit to coordinating with the City on the Seaport Transit Strategic Plan which will include an analysis of shuttle bus routes in the Seaport District and how this shuttle might fit into other consolidated shuttle services and operations. The proponent should commit to a monitoring program of this service in the Transportation Access Plan Agreement with BTD.

- **Timing**: The Proponent should commit to a specific timeline for Shuttle implementation. This should coincide with a maximum of 3 million square feet of development on the proposed site.

- **North Station/Chelsea Shuttle Services:** The Proponent should further define other shuttle connections in the next round of project submittals, including the connections outlined to the Orange Line and Commuter Rail. These shuttle services should generally be publically accessible, frequent enough to enable viable use during peak period commuting, fully ADA accessible, and fully coordinated with the City.

1.14

C. Roadway

Roadway enhancements will enable multi-modal access to the Suffolk Downs site and ensure surrounding neighborhoods are adequately accommodated due to the Suffolk Downs development. Roadway enhancements should prioritize safety improvements and the multi-modal network, accommodating all modes safely and responsibly.

Route 1A: The Proponent must commit to providing pragmatic and comprehensive improvements on Route 1A and other impacted intersections in the vicinity of the project. This corridor is currently congested and any additional traffic generated by the development could result in vehicles seeking alternative routes through neighborhood streets. The proponent should commit to:

- Conducting a traffic analysis that accounts for most recent 2018 trip volume data for the Sumner Tunnel, Ted Williams Tunnel and Route 1A. These counts should be used as a base to project traffic conditions for future years using growth rates that are consistent with the rate of traffic increase over the last 10 years.

- A design and construction proposal that accommodates increases in traffic volumes generated by the project to decrease impact on neighborhood streets. . The Proponent should further explore HOV and/or bus lanes on Route 1A with concepts that include international best practices for managed lanes. Additionally, the proponent should consider the evaluation of right-of-way dimensional constraints. The proponent should carefully consider resiliency as well bike and pedestrian crossings and connections on Route 1A to ensure the road is safe for all users. **1.15**

- Design proposals for off-site mitigation at the Sumner Tunnel connection to Storrow Drive, and potentially at connections to the Ted Williams Tunnel to increase roadway safety, transit connections, and resiliency.

- The Proponent should clarify site roadway ownership with relevant City agencies.

The Proponent should work with the City to define a detailed scope and timeline for analysis and design related to the proposed improvements.

D. Modeling

Household Size: The Proponent's modeling assumed approximately 1.58 persons per household; however, additional information and details are needed to justify this number. The following information is known to/under consideration by the City:

- The Average household size in East Boston is currently 2.8 persons per dwelling unit. While average household in the proposed project may not reach averages found in the rest of the East Boston neighborhood, the Proponent does not provide a detailed methodology for how the project will be at 1.58 in the DPIR.
- The City received information from the Proponent about anticipated unit types (number of studios, one beds, two beds, etc.) with anticipated average occupancy rates by type (e.g. an assumption of 2.5 persons per 3 bedroom). However, there is no backup data (i.e. comparable projects, comparable census tracts, etc.) and analysis to justify the very low average household sizes proposed by the Proponent. Such data should be provided, with specific projects referenced, to explain the household sizes assumed by the proponent. **1.16**
- American Community Survey (ACS) Census data from 2017 shows that the average household size on the South Boston Waterfront--a relatively new, large-scale, mixed-use neighborhood--is 1.75. Also, preliminary forecasts by the BPDA Research Department suggest that, by the year 2030, the average household size citywide in Boston will be 2.1 and in East Boston specifically will be 2.6. Based on the above, we believe that the average household size assumed for modeling purposes should be

closer to 2 persons per household. The Proponent should continue to work with BPDA to determine an appropriate average household size to use in transportation and municipal impact modeling.

Employees/Office Square Footage Ratio: Correct modeling is critical to assessing impact on transit and vehicular networks. Based on the submitted DPIR, it is not clear what ratio is anticipated by the Proponent. This ratio is presumably used to model transportation impacts; unrealistic modeling assumptions will result in transit and road networks that are not properly built to accommodate development. These issues are concerning and should rectified in the next phase of this process:

- The Proponent should state explicitly what ratio is assumed for employees/office square footage. These ratios should reflect averages in comparable developments of the City and region. The Proponent should provide examples of comparable commercial and residential buildings in in the City and base modeling averages on these.

1.17

TOD v. CTPS Assumptions: The assumptions used for transportation modeling have become a key concern through interagency discussions during this development review process. The City recognizes that the Proponent did not agree with the MassDOT-proposed CTPS model for assumptions and chose to model a second, "TOD" model. This has been discussed thoroughly in interagency meetings, but still must be referenced specifically as outlined in the DPIR. These modeling assumptions, paired with the development program that will be realized, are significant in determining transportation impacts. It has become clear now that Program A will no longer be pursued, as the Proponent has stated that Program B is the new objective. A full transportation analysis should be completed for a Program B scenario, even though it is alluded to as having less of an impact in the DPIR.

1.18

Mode Share: The Proponent must take into consideration the mode share goals outlined in Go Boston 2030. The scoping comments submitted by the City originally stated a citywide mode share goal for transit of 45%. However, individual neighborhood transit mode share goals were determined to be a one-third increase. Using this neighborhood-specific methodology would yield a 48% transit mode share goal for East Boston. The Proponent should discuss how they are helping to meet this transit mode share goal as well as the other mode share goals in Go Boston 2030.

1.19

Phasing: The City appreciates the detailed phasing plan for the traffic mitigation. However, in order to comprehensively model the transportation network under mitigated conditions, transportation analysis must include phased mitigation elements for transit, bike, and pedestrian improvements. The five (5) proposed phases should include approximate timelines so that the City can understanding the timing of transportation impacts.

1.20

In order to monitor transportation impacts on an ongoing basis, the Proponent should be prepared to provide annual updated mode share data, parking utilization data, and level of service for key intersections to be determined by BPDA and the Proponent. **1.21**

Expanded Impacts Area: While the initial transportation modeling was relatively comprehensive, more needs to be done in order to understand regional impacts. The City mentioned in scoping comments that the Proponent should include regional connections and bridges leading into East Boston. Specifically, the City asked that connections through the tunnels, the Chelsea Street Bridge, and the Meridian Street Bridge be considered in analysis. The Proponent should either 1) discuss why they did not include these in the analysis or 2) include them in additional filings for the project. **1.22**

E. Parking and Loading

Parking and Loading: Parking and loading are important components of a transportation plan. Controlling the number of parking spaces can have direct impacts on the number of vehicle trips being generated by the site. The location of parking and loading entrances/egresses are a place of potential conflict with other modes as they are intersections with the public realm. Key elements for consideration include:

- **Parking Ratios:** As mentioned in previous scoping comments, the City believes that a lower set of parking ratios must be used for this site. The Proponent should consider the following parking ratios: 0.6/residential unit and 1/1000 sf office, retail, lab. Specifically, the Proponent states that the office, retail, and lab sf would be unattainable. Considering the TOD nature of this site and previous arguments used by the Proponent for this site having excellent transit access, a 1/1000 sf parking ratio is reasonable. **1.23**

- **Phased Parking Strategy:** Besides lower the parking ratios generally, this project should also feature a comprehensive parking strategy. Because of the long timeline and the Proponent's commitment to monitor parking demand over the build-out of the project, a detailed strategy is necessary. This strategy would include approximate timelines as deemed appropriate with phasing, threshold limits for monitoring to determine if parking should be increased at all, and scheduled check-ins with the BPDA and BTD over the course of the build-out with the express purpose of monitoring parking supply and demand. **1.24**

- To reiterate an urban design comment to come later in this document, loading must not occur on major streets, especially in the commercial spine of the project. Creating a completely new set of streets provides the opportunity to simultaneously create a solid network of alleys and internal access that should be used for loading. **1.25**

- **Curbside Parking Strategy:** Curbside parking management is integral to a greater parking strategy as well as to the urban design and public realm experience of any

project. The City of Boston comment letter to the Suffolk Downs PNF requested that the Proponent create a strategy for curbside parking regulations. The Proponent responded that parking would be time limited, but not metered. This response was

1.26 not sufficiently detailed to warrant being a full curbside parking strategy. The City requests that the Proponent create such a strategy including but not limited to the following elements: detailed segments of time limits and meters, TNC pick-up/drop-off zones, loading zones, and the feasibility of parking restricted areas.

F. Bike Infrastructure

All modes should be represented when discussing transportation mitigation. The Proponent relies heavily on improvements to Route 1A, and although they have stated that they would improve transportation where desired, bicycle accommodations have dropped out of the discussion. There was good work done in the DPIR to suggest improvements to the bicycle network connecting *to* the project site and this should be executed as a part of mitigation. The conceptual plans are drawn up in the DPIR filing and should be executed pending further discussions with BPDA and BTD. Key elements for biking consideration include:

- **Bike Lane Design:** In conjunction with BPDA Urban Design, it is recommended that bike lanes along roadways be revisited. The Proponent should replace standard bike lanes with separated bike lanes on the main commercial spine. Additionally, physical separation should be provided on all "primary" and "vehicle thoroughfare" streets. Specifically:
    - The "Main Street" Commercial spine should have separated cycle tracks reduce the potential for biking and car conflicts on a busy street.
    - Belle Isle Square should not use "shared" lanes but should have separated

1.27 cycle tracks to enable connections to Suffolk Downs Station. Additionally, the connection from the site to Suffolk Downs Station should include a bike connection.
    - An evaluation of other streets with bike lanes. This evaluation should assume that cycle tracks are included where any of the following criteria are met:
        - Daily vehicle counts are expected to be above 6,000 vehicles per day;
        - Includes curbside parking/loading (to avoid door zones);
        - Includes Parking garage access and/or building loading access on the street; and
        - Speeds are anticipated to be at or above 25 MPH.

- **Bicycle Parking:** The City would like to follow up on a scoping session comment

1.28 that bicycle parking capacity be added to Blue Line stations. This parking should be bicycle cages to securely store bicycles for those commuting to work via bike and then the Blue Line coming from Suffolk Downs. Determining the parking capacity

must be modeled to account for those within the site who may bike to the station from their residence and transfer to the Blue Line.

Additionally, secured covered bicycle storage should be provided within each building at ratios consistent with City policy. Changing rooms and shower facilities for bicycle commuters should be provided for employees in all commercial buildings. **1.28 Cont'd**

- **Bike Share:** The Proponent should outline a strategy for determining Bluebikes station locations within the Site. As per BTD guidelines, projects over 100,000 sf need to include at least 1 Bluebikes station unless there is one nearby. Five stations with an average capacity of 15 bikes per station does not seem to be an appropriate number for nearly 16 million square feet of development. A Bluebikes station strategy should be constructed in tandem with placement of *Mobility microHUBs* (easing transfers by co-locating shuttle stops, bus stops, TNC pick-up/drop-off, bike share, care share, and EV charging at key destinations such as T stops, outside major office and residential buildings, and community centers). **1.29**

- **East Boston Greenway:** The East Boston Greenway is a vital off-road bike path in East Boston and, if extended to the Suffolk Downs site, would enable a safe connection from the East Boston community. Additionally, other connections would provide commuter and recreational bike network enhancements around the neighborhood and to Revere. Thus, the Proponent should work with the City to ensure that the site is well connected to the existing East Boston Greenway, which ends at Constitution Beach. This includes: **1.30**

    - Design and construct an extension from Constitution Beach to the site via Bennington Street and Walley Street.

    - Design an extension of the East Boston Greenway to Belle Isle Marsh and Revere Beach.

G. New Mobility

For purposes of discussion, "New Mobility" is considered to be any emerging technologies, recent developments in transportation technology, or alternative forms of transportation. Of primary concern when discussing New Mobility are TNCs. These transportation network companies (such as Uber and Lyft) provide a unique challenge to traditional transportation planning; many trips are generated with low average VMT and high turnover rate. The City of Boston is concerned with curbside management of TNCs and how to effectively stop them from impeding other users of the public right of way. As such, the City would like the Proponent to consider making a strategy for how to manage TNCs in conjunction with a greater curbside management strategy and incentives to encourage shared rides. This strategy should discuss ideas of Mobility microHUBs, (as previously mentioned) and how to **1.31**

1.31 Cont'd

effectively manage TNCs on a project-by-project or district basis. For example, setting a policy for requiring a curbside transportation manager for any new buildings would be an appropriate element of a TNC strategy.

H. TDM

The following suggestions related to TDM were included in the City's scoping session comments. The City hopes for this project to have a robust TDM strategy that is logical for all stages of the project buildout. The suggestions include:

- The proponent should require tenants to supply subsidies on T passes, not simply encourage it.
- Assign an onsite TDM Coordinator to oversee all TDM programs for each building.
- Establish a rideshare program.
- Provide Bluebike facilities (see comments under "Bike Infrastructure" above).
- Disseminate information on alternate modes of transportation and development of transportation-related marketing and education materials.
- Develop and distribute information pertaining to pedestrian and bicycle access to and from the project site.

1.32

- Provide preferential carpool and vanpool parking.
- Sponsor vanpools and subsidized expenses.
- Provide promotional events for transit riders, bicyclists and pedestrians.
- Designate locations for pick-up and drop-off of TNCs and shuttles that are woven into a cohesive strategy as mentioned in the New Mobility section above. Innovative solutions such as geofencing individual buildings, providing incentives for shared rides, should be explored and reported on.
- Establish a strategy for car sharing in individual parking areas on the project site. This would include services such as Zipcar or others that develop in the coming years.
- Quantitatively analyze the feasibility of providing unbundled parking at each proposed building.

- Establish a centralized TMA specifically for this site. It should then be a program that can be expanded to include other developments in East Boston. The Proponent should partner with A Better City to establish a service similar to those in other neighborhoods in Boston.

1.32 Cont'd

I. Resiliency

Blue Line Sea Level Rise/Flood Protection: The Blue Line rapid transit tracks between Bennington Street and the Suffolk Downs station are projected to be threatened by sea level rise and flooding. The City of Boston has an online resource, "Climate Ready Boston Map", that provides insight on the threats associated with climate change. These threats would impact the Suffolk Downs site, the Suffolk Downs station, and Blue Line operations. In meetings with MassDOT and the City, the Proponent outlined steps that could be taken to ensure protection of the Blue Line from sea level rise and flooding. This included building a berm adjacent to Bennington Street and Beachmont Veterans Memorial School; this berm would also potentially protect the Beachmont neighborhood from flooding. The proponent should evaluate the cost, feasibility and effectiveness of this proposed improvement further and, if acceptable to the Cities of Boston and Revere and the Commonwealth of Massachusetts, build it as part of necessary mitigation. If this berm is not acceptable, then the proponent should evaluate the cost and feasibility of an alternative strategy acceptable to the public agencies to provide an equivalent protection barrier for the Blue Line and implement such strategy.

1.33

Bennington Street/Belle Isle Marsh/Sales Creek Infrastructure: The proponent should evaluate the adequacy and condition of the Belle Isle March/Sales Creek Infrastructure which convey tidal and stormwater from the development to the Belle Isle Inlet, particularly in light of anticipated sea level rise. If insufficient, this could affect the viability of Bennington Street in future storms and flooding. The cost, extent and feasibility of needed upgrades should be assessed.

1.34

MEMORANDUM

To: Tim Czerwienski, Project Manager
From: BPDA Planning and Urban Design Staff
Subject: Suffolk Downs DPIR
Planning and Urban Design Comments

Since the initial filing (November 2017), the Proponent and their consultants have made significant revisions to the master plan in response to written comments and verbal feedback by BPDA staff and other City of Boston agencies. These revisions, in particular those changes made to the East Boston edge of the project shared with the Orient Heights neighborhood, have resulted in major improvements to the plan. BPDA staff commends the Proponent for their commitment to finding the right urban framework to support this massive redevelopment project, one which will take decades to implement and whose context will invariably change over time. The BPDA's lens for evaluation continues to look beyond the near-term and into the medium future, knowing that the environmental, social, and physical context will continue to evolve.

In response to the DPIR (October 2018), staff request additional information about the project, and recommend further study of specific conditions. A supplemental diagram to further clarify these comments is attached. Continued discussion is anticipated regarding adjustments and modifications to the master plan.

General Planning Context

To the extent possible, more specific data is needed at the parcel and building scale. Area (both parcel and building footprint), land use, FAR, and massing diagrams should be provided to better evaluate the proposed impacts of the Master Plan.

Land Use

- Land use must include civic uses
  - To be clearly identified in use tables and calculations
  - To be clearly communicated in diagrams and 3D models where known civic programs are integrated with buildings
- Land use tables must delimit Boston and Revere

2.1

Area Calculations

- Provide parcelization diagram
- Area calculations including parcel area, gross square footage, ground floor footprint and FAR must be provided per building
- Area calculations must delimit Boston and Revere

2.2

Population Calculations

- The Proponent should continue to work with BPDA to determine an appropriate average household size estimate for transportation modeling and municipal impact purposes. **2.3**

Transportation

Extensive comments have been provided by BPDA Transportation Planning and BTD staff. Comments below focus primarily on configuration of roadways and other pedestrian/bike paths and their subsequent impact on building form and orientation, as well as location and shape of open space. At a master planning level, staff support the basic street hierarchy as a mechanism to consolidate service (parking and loading) to shared alleyways and tertiary streets in order to limit the presence of these functions on the major streets. Regardless, pedestrian and bike activity accommodations should be provided on all streets.

Route 1A Gateway

Given the prominence of this intersection as a gateway to Suffolk Downs, there are additional roadway and building configurations that should be studied. Anticipating a more urban long-term future on the far side of Route 1A and to "set the tone" for the streets internal to Suffolk Downs, this intersection geometry should be further refined. Complementary to the roadway entry is the opportunity for a significant building whose architecture functions as a threshold into the larger site. Reconfiguring the secondary and tertiary roads and eliminating the cul-de-sac at this location helps achieve this, while eliminating a more suburban street typology.

- Where possible, consolidate vehicular entry sequence from Route 1A. Informed by detailed comments submitted by transportation staff, the proponent should continue to refine this intersection. **2.4**
- The interior street running from the existing cul-de-sac to Belle Isle Square should be reconfigured to have an outlet on Tomasello Way. **2.5**
- In combination with the above, study combining Blocks 1 and 5 into a single gateway building with a podium and tower. Building should be designed with multiple fronts, as it will be visible from Route 1A from both the north and south, and as a terminus to the secondary/tertiary street running from Belle Isle Square and Suffolk Downs Station. **2.6**
- Study shifting the secondary/tertiary drive, which currently ends in a cul-de-sac at blocks 1 and 5 to create more balanced building sizes on either side, particularly to the west as it approaches Route 1A. It may be that an imbalance in building size on either side of the street is desirable, but further study is warranted. **2.7**

Profile of Tomasello Way and New Street

Reconfiguring the extension (Primary Drive) of Tomasello Way into a landscaped boulevard with a median introduces a new street typology that could have residual architecture and open space benefits. A boulevard will provide more of a grand entry into the heart of the site through a classic and impactful double allee of trees, while yielding more usable open space in other areas of the master plan.

- Though Tomasello Way will function as a major street, the proposed Primary Drive should also sit atop the street hierarchy. The current configuration forces a right turn off Tomasello Way onto Primary Drive. Eastbound vehicular movements on Primary Drive should more directly flow off Tomasello Way toward Main Street and the central open space. Westbound vehicular movements which continue on Tomasello should be managed through a perpendicular intersection with a left turn. **2.8**
- To underscore the importance of Primary Drive, explore a boulevard median for a section of the Primary Drive from the branch at Tomasello Way to the intersection with Main Street and the Central Common. **2.9**
- A boulevard treatment would also provide some additional benefits. First, it would introduce a wayfinding element to the Main Street and to the Central Common. Second, it shifts a strip of green to the median and signals a slowing of the traffic with the added opportunity for an allee of trees on both the east and west bound sides of the Primary Drive. The remainder of the proposed open space that was adjacent to Blocks 26, 28, and 30 can be reallocated to create larger, more usable open spaces (such as the open space near Block 35 and between Blocks 36 and 37). This largely unusable tail of open space can be reimagined as buildings fronting on the boulevard (expanding Blocks 26, 28, and 30). With the additional square footage, Block 30 can then be split to extend the street grid to the east. **2.10**

Parking, Loading, and Building Access

While it is clear certain streets are functioning primarily for loading and service (*e.g.,* the tertiary street between blocks 12-15 and blocks 16-20), the location of loading docks and pedestrian building entrances should be defined at a master plan level. The commercial area at the center of the redevelopment, in particular, should locate loading docks and parking entries so as not to interfere with the retail character of main street, the proposed active linear corridor, or the green fingers extending to the Central Common. A strategy for building entrances should also be defined. Building porosity is desirable, and it is expected that buildings will be accessed from multiple sides (*i.e.,* from the Active Linear Corridor and the adjacent streets), though ostensibly with a primary entrance. **2.11**

Echoing comments provided by the Transportation staff, a comprehensive parking strategy should continue to be refined. Location of entrances/egress and lower parking ratios will result in more varied and high quality architecture. **2.12**

Suffolk Downs T Station and Belle Isle Square

As discussed extensively in the Transportation comments, transit is paramount to the success of Suffolk Downs. The success of Belle Isle Square to function as a forecourt to the Suffolk Downs MBTA Station is an important consideration, but must also do so in concert with regional and local MBTA bus operations. Belle Isle Square should prioritize pedestrians and cyclists, but further study is necessary to explore how bringing buses directly to or as close as possible to the Suffolk Downs MBTA Station can be achieved. The design of the Square and to the access point where Suffolk Downs, the T, and Waldemar Avenue intersect is also an important locus point for continued study. **2.13**

Ultimately, modifications to the current Belle Isle Square design may be warranted. The Proponent should prepare detailed cross sections and 3D diagrams as the design evolves. As previously mentioned, alterations to Phase I buildings to produce transit benefits would be welcome. BPDA staff will continue to collaborate with the Proponent, the State, and the abutters just beyond the property line along Waldemar Avenue to ensure that this important access point reflects the best possible long-term scenario for the project and the neighborhood. **2.14**

Urban Design

Urban Design comments will be focused on a few key elements of the Master Plan, as it is expected that BPDA staff will continue to collaborate with the Proponent on further refinements to the architecture of the buildings and associated public realm. As a general point, BPDA staff reiterates a comment from the Scoping Determination to include more 3D diagrams and to use technologies to help explain or illustrate spatial concepts. The heavy reliance on plan and section diagrams, while useful, does not provide the same utility that 3D models and diagrams can convey. **2.15**

There are still many questions regarding building typologies, but the comments below are focused on the Orient Heights Neighborhood Park, general distribution of open space, and Belle Isle Square. The increase in block number to create greater variety in block sizes has produced more visual interest in the Master Plan, but superblocks still remain on the Revere side. The success of the Master Plan hinges on a heterogeneous mix of buildings that all work together. This project should aspire to ensure that the work done to refine and introduce smaller scales of building on the Boston side is propagated throughout the larger site.

Lastly, in light of the news that Amazon's HQ2 will not be relocating to Boston, it is expected that future iterations of the Master Plan will focus on the housing-heavy option. It is also anticipated that some retroactive modification to the buildings approved as part of Phase I

and to the design of Belle Isle Square may be appropriate and perhaps necessary. BPDA staff encourage the Proponent to consider alternate phasing scenarios, perhaps building Blocks 20 and 24 together, followed by Blocks 19 and 22.

Open Space

- An Orient Heights neighborhood park is a welcome amenity for the existing neighborhood and introduces a nice scale of open space as a side door to Suffolk Downs. As one bookend to the active linear corridor and located at the same grade as Waldemar Avenue, the neighborhood park will provide an open space bridge into the larger redevelopment site. Though accessible for pedestrians, bicycle accommodations should also be provided to provide an additional entry point for cyclists into Suffolk Downs. **2.16**
- The Proponent should explore an additional pocket park or small open space on Waldemar Avenue between the single-family homes and Block 4. Though shifting some of the open space may introduce grade change at that location, locating an open space closer to the Boston Housing Authority's ("BHA") Orient Heights Redevelopment would provide a better transition in building height from multifamily to single-family in the east-west direction, and would provide better access to residents who today have limited access to open space. **2.17**
- Regardless, a pedestrian connection / urban staircase closer to Orient Heights between the single-family residences and Block 4 should be explored as an alternate mechanism to provide a transition in building scale and "pause" in the street, inviting residents further up the hill into Suffolk Downs and the open spaces therein. **2.18**
- Related to the reconfiguration of Primary Drive and associated median, open space adjacent to blocks 26, 28 and 30 can be reallocated to create larger, more usable open spaces (such as the open space near Block 35 between Blocks 36 and 37) . **2.19**
- A residual effect might be the combination of Blocks 36 and 56 into a single, more regularly shaped / sized parcel, which could still support civic use at the ground floor. This configuration could be centered between the Primary Drive and the edge of Block 37 to the north to allow a view of the open space and the pond from the Primary Drive, creating a large aperture between it and Block 37. **2.20**

MEMORANDUM

TO: Tim Czerwienski, Project Manager
FROM: BPDA Environment & Climate Change Planning Staff
SUBJECT: Suffolk Downs Redevelopment Draft Project Impact Report
Environmental & Climate Change and Article 37 Comments

Environmental Analysis

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

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

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

Shadow

The Proponent has stated that **Table 9-2** (contained in the Draft Project Impact Report) shows the solar azimuth and altitude data and is reflective of a latitude of 42.358º and a longitude of 71.06º. However, the solar azimuth and altitude data for December 21st is not accurate, please review and update the shadow images. **3.1**

Wind

It appears that a qualitative "wind tunnel study" of potential wind conditions was conducted and not the Boston Planning & Development Agency (BPDA) requested "wind tunnel analysis". Thus, the Proponent shall be required to conduct (as previously requested) a quantitative (wind tunnel) analysis of pedestrian level winds for the following configurations: **3.2**

Configuration A-Existing: Existing site conditions with existing surrounding buildings and those under construction, to establish a baseline condition.

Configuration B-Proposed Phase 1 Project: Proposed Phase 1 Project with existing surrounding buildings (as per the wind sensor plan approved by the BPDA);

Configuration C-Proposed Phase 1 Project and Master Plan Project: The Proposed Phase 1 Project with surrounding buildings and (Boston and Revere) Master Plan Project buildings.

Configuration D (Optional)-The Proposed Phase 1 Project with surrounding buildings, (Boston and Revere) Master Plan Project buildings and BPDA Board approved projects within 1,500-2,000 feet of the Proposed Project site. **3.2**

(With the submission of each subsequent phase, either a qualitative or quantitative analysis shall be conducted- a determination shall be based on phase building details ((in compliance with the BPDA Design Review Guidelines)) and in consultation with BPDA staff.)

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

ARTICLE 37 IGBC REVIEW COMMENTS

Sustainability Vision

Suffolk Downs, as the single largest development project in Boston's history, has a unique responsibility and opportunity to address our changing climate and environmental challenges. The development team should establish a leadership sustainability vision and brand for the redevelopment that envisions a thriving and vibrant new community that is climate ready and carbon free. **3.3**

Innovations in planning, engineering, design, and construction, which are already leading characteristics of the Suffolk Downs, should be expanded upon and elevated. The development team should explore new strategies and products for dramatically reducing carbon emissions, engaging residents and occupants in the ongoing planning and design, for monitoring of energy and water use, waste generation, emissions by travel modes, and overall environmental stewardship.

Green Buildings

The Proponent's November 28, 2018 Proposed Green Building Mitigation memo and verbal commitments to crafting and articulating a broad sustainability vision are significant steps to establishing an overarching resiliency and sustainability vision for the project. The progress is greatly appreciated!

The following comments and requests for supplemental information reflect our review of both the DPIR filing and November 28th Proposed Green Building Mitigation memo.

Proposed Green Building Mitigation

I. Passive House & Energy Positive (E+) Buildings

- Please define and provide the performance characteristics of both the “traditional” and “passive house” design options including LEED characteristics that will be consistent in both options. **3.4**
- The City of Boston is committed to achieving carbon neutrality by 2050 and requests all new single family and townhome buildings be net energy positive (E+) and that the demonstration Multifamily Residential project target net energy positive (E+) performance integrating building energy efficiency and onsite solar PV. **3.5**

II. Energy Profiles

- The building type specific energy models included in the DPIR indicate significant opportunity for better building performance; would it be useful for those models be revised to reflect the proposed Energy Profiles? The minimum thresholds for the proposed Energy Profiles should better reflect those opportunities as follows: exceed 10% buildings = >50% savings, 35% buildings = 35% to 50% savings, 50% buildings = 25% to 35% savings, and 5% buildings = 15% to 25% savings. **3.6**
- Please define “current code”? Our read is that Energy Profiles imply modeled building energy saving (not cost) based on comparison to the Massachusetts Building Energy Code applicable at the time of construction permitting and that this does NOT include energy offset by rooftop, building integrated, or onsite renewable energy sources. **3.7**
- Please clarify how the percentages of “Buildings” will be measured; our preference is by square feet of building? **3.8**
- Given the long duration of development and build out do you have ideas for ensuring all of the minimum thresholds will be exceeded prior to completion? **3.9**

III. Solar PV

- In addition to all buildings being **solar ready**, all building should be **solar optimized** including building orientation, maximizing roof space for solar panels, minimizing and managing the location of rooftop mechanical equipment and penthouse structures, and integration of solar panels in site and building shading and canopy elements. **3.10**
- Optimally, all new building should include solar PV concurrent with construction completion. Can the 2 MW of solar PV commitment include solar PV installations with each building and solar PV installation targets or commitments by phase? **3.11**

IV. LEED

- Thank you for the LEED outcome commitments! Can you clarify how the percentages of “Buildings” will be measured; our preference is by square feet of building? **3.12**
- As the planning shifts to individual building design, the developer is required to provide a building specific Article 37 Green Building - Initial Filing at the pre- **3.13**

schematic design phase which should be prior to or concurrent with the first building specific BPDA urban design submission. **3.13**

- Given the long duration of development and the regular evolution of the LEED rating system each building should utilize the most current LEED rating system available at the time of the Article 37 Green Building - Initial Filing. **3.14**

Draft EIR/PIR

LEED

- The development team has demonstrated a commitment to holistic sustainability and integrative project planning; can the team translate this commitment to achieving the LEED Integrative Process credit for all of the buildings? **3.15**
- Thank you for including the LEED ND analysis and Checklist. The project team should identify strategies and credits for achieving LEED ND Gold. **3.16**
- The Proposed Green Building Mitigation plan commits the majority of buildings to achieving LEED Gold; can the building typology LEED Checklist should be updated to more fully reflect those commitments? **3.17**

Energy Models

The building type energy models demonstrate the feasibility for achieving better building performance and illustrate opportunities to significantly reduce GHG emissions through passive building strategies. With almost all of the building type energy models, the modeling assumptions for the building envelop of the Design Case were the same (e.g. Roof Insulation, Wall Assembly Opaque) or worse (e.g. Wall Assembly – Spandrel, Window to Wall Ratios) than the Base Case.

- Based on the Demonstration Pilot commitment, when can the building energy models be updated? **3.18**
- Can the development team establish exemplary building envelope standards for each building typology? **3.19**

Building based Combined Heat and Power (CHP) Systems

The developer should include building CHP systems wherever base domestic hot water loads support feasibility. The developer should also assess the use or inclusion of CHP for meeting building emergency power requirements, and for providing secure power for tenants and onsite critical facilities and areas. **3.20**

Regulatory

The requirements of Zoning Article 37 Green Building are applicable to the entire Suffolk Downs PDA site. All buildings, regardless of floor area, are required to demonstrate

compliance with Article 37. Please review Article 37 Green Building and Climate Resiliency Guidelines and utilize the most current Review Procedures and Submittal Requirements.

For each building, at the initiation of the schematic design phase and coinciding with start of the BPDA urban design review for that building, the Proponent is to provide a building specific Article 37 Green Building Initial Filing including the LEED and Climate Resiliency Checklists. As the design of each building progresses, the Proponent is to provide a building specific Article 37 Design / Building Permit Filing and, at construction completion, a Construction / Certificate of Occupancy Filing in accordance with the Boston Zoning Code Article 37 Green Buildings and Climate Resiliency Review Procedures and Submittal Requirements. Building specific submissions must be provided for each building. A clusters of similar small residential buildings may be included in a single Filing.

Please review Article 37 Green Building and Climate Resiliency Guidelines and utilize the most current Review Procedures and Submittal Requirements.

The long term phasing of the project should be reflected in both general and building specific GHG emission reduction commitments so that those commitments progressively increase over the duration of the buildout. Initial building designs should, at minimum, target low carbon performance and anticipate future adaptations actions for achieving net zero and net positive carbon performance. Later phase buildings should anticipate minimum requirements for net zero carbon performance.

RESILIENCY

The DEIR/DPIR Climate Change Resiliency section provides a thorough analysis of anticipated on-site and off-site climate change impacts, modeling a number of precipitation and coastal storm events integrating future sea level rise. The proponent's approach to manage future flood hazards is consistent with the City's climate preparedness strategy of providing layers of resilient infrastructure and strategies.

Building ground floors should all be elevated to meet or exceed BPDA recommended Sea Level Rise Base Flood Elevation Datum with freeboard. The proposal includes elevating non-critical buildings to a finished floor of 20.5 BCB and 21.5 BCB for critical building systems and sensitive uses. Elevated site grade, roads and building systems are also designed to accommodate a sheltering in place strategy during major future flood conditions. Recommended measures to manage future precipitation and coastal storm events include additional flood storage in the Central Common, floodable open space and directing additional stormwater to the Chelsea Creek. The proponent should evaluate stormwater infrastructure to the Chelsea Creek and ensure that it has adequate capacity to handle additional volume. If the existing system does not have capacity the proponent should design and install a system to handle the added volumes. **3.21**

The proponent references use of subgrade garages adjacent to floodable open space for flood storage. Additional information should be provided regarding functional and structural feasibility of subgrade parking areas being used for storing urban runoff. If this is a viable option and part of the projects flood management measures, then the recommended storage volume of the garages must be a design requirement as part of those building components. **3.22**

The analysis notes that during significant coastal storm events with surge elevations above 14' BCB Bennington Street would be overtopped, leaving the pump station and tide gate non-functional. Mitigating strategies including an additional tide gate and improvements to the capacity of the existing pump station are proposed to protect the project site and upstream areas of Revere. Based upon the proponent's modeling and probability analysis the timing and phasing of the site measures, new tide gate and existing pump station improvements should be discussed. **3.23**

The project site is also vulnerable to coastal flooding from the Chelsea Creek to the west, and through Revere to the north, however, the DEIR/DPIR and modeling do not address these vulnerabilities. The proponent should address the extent to which the site is susceptible to flooding from these areas and the site and district scale measures needed to prevent future flooding from these pathways. The document notes that a regional flood barrier along the Bennington Street corridor coupled with improvements to the existing pump station provides the highest level of flood protection to all areas. This district scale option is consistent with the Mayor's Resilient Boston Harbor vision to protect all of Boston's waterfront neighborhood. The proponent is expected to be involved and contribute to advancing these district scale solutions and working with the City's of Revere, Boston, State agencies and other stakeholders that will benefit from these solutions. **3.24**

Due to the time scale associated with the full build condition the proponent should ensure building and site design maintains flexibility to address changes in the extent and onset of climate impacts, as well as advances in building materials and systems to mitigate the effects of heat, stormwater and coastal flooding. **3.25**

MEMORANDUM

To: Tim Czerwienski, Project Manager
From: Manuel Esquivel, Senior Infrastructure & Energy Planning Fellow
Subject: Suffolk Downs DPIR
Smart Utilities Comments

SMART UTILITIES

- **District Energy Microgrid:**
  - The project team is working towards completing the District Energy Feasibility Assessment, which will be followed by the preparation of the District Energy Microgrid Master Plan.
  - The Feasibility Assessment and Master Plan will define the District Energy Microgrid commitment to be included in the Cooperation Agreement.

- **Telecommunications Utilidor:**
  - Provide a map/diagram highlighting the sections of the roads on the development area where a Telecom Utilidor will be installed, including access points to the Utilidor (i.e., manholes).
  - Provide the following information: **4.1**
    1. Dimensions of Telecom Utilidor:
       a. Cross section dimensions (i.e., diameter or width X height)
       b. Length
    2. Capacity of Telecom Utilidor: (i.e., number of interducts, 2 inch (ID) pipes, etc.)

- **Green Infrastructure:**
  - Provide a map/diagram highlighting where on the development Green Infrastructure will be installed
  - Provide the following information:
    1. Types of Green Infrastructure included in the project: (drop down)
       a. Bioretention basins
       b. Bioretention planters **4.2**
       c. Infiltration chambers
       d. Tree pits/trenches
       e. Dry wells
       f. Permeable paving
       g. Other (specify)
    2. Total impervious area of the development: (Number field)
    3. Volume of stormwater that will be retained: (Number field) - Note: Should equal to at least "Total impervious area times 1.25 inches"

- **Adaptive Signal Technology:**
  - Provide a map/diagram highlighting where on the development AST new signals and improvements to signals will be installed
  - Provide the following information:
    1. Describe how the AST system will benefit/impact the following modes:
       a. Pedestrians
       b. Bicycles
       c. Buses and other Public Transportation
       d. Other Motorized Vehicles
    2. Describe the components of the AST system (system design and components).

4.3

- **Smart Street Lights:**
  - Provide a map/diagram highlighting where new street lights will be installed or where improvements to street lights will be made

4.4

- **Smart Utility Standards:**
  - Provide typical below and above grade cross section diagrams of all utility infrastructure in your development area (including infrastructure related to the applicable SUTs)
  - Provide typical below and above grade lateral diagrams of all utility infrastructure (including infrastructure related to the applicable SUTs)

4.5

APPENDIX B

COMMENTS FROM ELECTED OFFICIALS, PUBLIC AGENCIES, AND THE GENERAL PUBLIC

Boston Water and Sewer Commission

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

December 14, 2018

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

And

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

Re: Suffolk Downs Redevelopment Project
East Boston and Revere

Dear Secretary Beaton and Mr. Czerwienski:

The Boston Water and Sewer Commission (Commission) reviewed, the October 1, 2018, Draft Environmental Impact Report /Draft Project Impact Report (DEIR/DPIR) and the November 30, 2018 Response to Request for Additional Information (RRAI) for the Suffolk Downs redevelopment project located in East Boston. The Commission reviewed the Expanded Environmental Notification Form/ Expanded Project Notification Form (EENF/EPNF) for this project and submitted comments to the MEPA Office and the Boston Planning and Development Agency on January 4, 2018.

The DEIR/DPIR was prepared in response to the Certificate issued by the MEPA Office and the Scoping Determination issued by the BPDA refines the project since the original filing and presents greater detail of the proposed development. Significant changes to the project include, reduction of density by 300,000 sf., expansion of Belle Isle Square, addition of a small retail building, a new park along Waldermar Avenue and two new street.

Chapter 13 of the DEIR/DPIR provides the project proponents response to comments received on the EENF/EPNF during the public review period. The Commission's comment letter and the proponent's response is included in this chapter. The Commission reviewed the project proponent's response to each Commission comment and determined all comments were addressed to the satisfaction of the Commission.

The RRAI, requested by the MEPA Office, provides additional information to questions and comments made during the public comment period. The responses are generally related to project alternatives and environmental issues. Also, an updated version of the response to comments from Chapter 13 of the DEIR/DPIR is in Appendix A of the RRAI. The reply to the Commission's comment letter are the same as stated in the EENF/EPNF.

The changes to the project stated in the DEIR/DPIR do not alter the Commission's comment regarding the project. Therefore, the Commission's comments remain as stated in the January 4, 2018 letter.

Thank you for the opportunity to comment on this project.

Yours truly,

John P. Sullivan, P.E.
Chief Engineer

JPS/ra

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

BOSTON

Martin J. Walsh, Mayor

December 17, 2018

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

RE: Suffolk Downs DEIR/DPIR; 525 McClellan Highway in East Boston

Dear Ms. Polhemus:

The Boston Parks and Recreation Department (BPRD) has reviewed the concurrent *Draft Environmental Impact Report* (DEIR) and the *Draft Project Impact Report* (DPIR) for the redevelopment of the Suffolk Downs site located at 525 McClellan Highway in East Boston. This site is adjacent to the Belle Isle Marsh Reservation which is protected public open space.

BPRD previously reviewed the *Expanded Environmental Notification Form* and the *Expanded Project Notification Form* (EENF/EPNF) in a letter dated February 2, 2018. Many issues in that letter remain open. Comments on the DEIR/DPIR are provided below.

Summary

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. Open space that is required, negotiated or proposed as mitigation for Article 80 or through the MEPA approval process as a public benefit should be quantified to ensure that it does not change with future amendments to the development plan. **66.1**

A needs analysis should be completed based on the projected users of open space. It should estimate the demand for active recreational needs and quantify the open space provided onsite to accommodate those needs, as well to help meet the active recreation needs in East Boston. An impact assessment should be done to determine impacts to public open space and mitigation. **66.2**

Open space for active recreation should be provided onsite, or in the form of a contribution commensurate to the scale of the development to the City's Fund for Parks, to be used for open space, improvements to existing public parks and climate resiliency in East Boston. **66.3**

Open space that is required, negotiated or proposed as mitigation for Article 80 or MEPA approval as a public benefit should be transferred to public ownership or otherwise protected in perpetuity to ensure that it does not change with future amendments to the development plan. **66.4**

Open space that is required, negotiated or proposed as mitigation for Article 80 or MEPA approval as a public benefit should be implemented in the first phase of development. This will provide the framework for development and ensure that the public benefit to the neighborhood of East Boston is realized in the near term and is not impacted by future amendments to the plan.

Development Program

The proponent is seeking approval for a Planned Area Development (PDA) from the Boston Planning and Development Agency (BPDA) to allow for variances from existing zoning, and to establish the mitigation of impacts and contributions to offset the development program. The project will have a 15-20 year buildout, though the phasing has not been provided in detail.

The project site is a total of 161 acres with 109 acres in the neighborhood of East Boston, and 52 acres in the City of Revere. The plan consists of 16.5 million sf of development with 10.5 million sf in Boston, and includes a mix of commercial, residential, retail, and open space uses. The proponent is seeking flexibility in the final program to allow response to market forces over time.

The DEIR/DPIR does not provide an estimate of the number of residents or users. However, the infrastructure impacts and mitigation for water demand and sewage generation were based on 10,000 residential units. This could be roughly estimated at 10,000-40,000 residents. The submittal does not clearly provide the estimated number of employees, shoppers, or visitors. **66.5**

Open Space

Suffolk Downs is about 350' from the Belle Isle Marsh Reservation, a 241 acre protected public open space owned by the Department of Conservation and Recreation (DCR) and local municipalities. It is part of the 1000 acre Rumney Marshes Area of Critical Environmental Concern (ACEC) and is habitat to many plants and wildlife that are rare to the metropolitan area. The marsh is also important for climate resiliency as it can provide storage of flood water.

The DEIR/DPIR states a $60 million investment will be made into 40 acres of publicly accessible open space. The conceptual open space plan includes passive use spaces such as a 15 acre central common, retail plazas at the two MBTA stations, an outdoor amphitheater, wetlands, playgrounds, several neighborhood scale open spaces, as well as an "active linear corridor" for pedestrian and bicycle use and dog runs. Since the EENF/EPNF, a small passive park along has been added on Waldemar Avenue near Orient Heights and a retail plaza was enlarged.

The DEIR/DPIR notes that the open space network is strategically designed to accommodate potential flooding impacts to the project associated with sea level rise. The project site includes a pond and other wetlands, and Sales Creek which connects the Revere watershed with the Belle Isle and Rumney Marshes. These wetland resources will be engineered for use as infrastructure for stormwater management to protect the project from climate change, and also as open space.

It is not clear how the open space acreage 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. Open space that is required, negotiated or proposed as mitigation or as a public benefit should be quantified to ensure that it does not change with future amendments to the development plan.

The proponent should clarify how it is counting the acreage, type and use of open space; detail how the open space will meet or mitigate each of the following; and note whether the same acreage is fulfilling multiple roles as design features, regulated, mitigation or public benefit: **6.6**

- Open space as mitigation under M.G.L. Chapter 30 Section 61;
- Open space required under M.G.L. Chapter 91;
- Open space approved by the EOEEA Secretary as a Public Benefits Determination;
- Open space which serves the needs of the neighborhood as identified in the *Imagine Boston 2030* and the *Open Space and Recreation Plan*; **66.66 ont d**
- Open space required by the underlying zoning;
- Open space mitigated for the Article 80 Planned Development Area in lieu of zoning;
- Open space which serves the active recreational needs of the users of the development;
- Open space which serves the passive recreational needs of the users of the development;
- Public realm space such as retail plazas; streets, sidewalks and parking areas;
- Open space intended to protect the project from coastal impacts of climate change; and
- Mitigation for impacts to existing public open space in the neighborhood; and

Needs Analysis and Impact Assessment

A needs analysis should be completed based on the projected users of open space. It should estimate the demand for active recreational needs and quantify the open space provided onsite to accommodate those needs, as well to help meet the active recreation needs in East Boston. An impact assessment should be done to determine impacts to public open space and mitigation. **66.77**

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

The PDA for Suffolk Downs will add 16.5 million sf of development to the neighborhood with up to 10,000 households, which can be estimated to have up to 40,000 residents. The proponent should address how it is meeting and improving the above ratio and the public open space needs outlined in the City's *Imagine Boston 2030*, which includes the *Open Space and Recreation Plan.* **66.88**

Constructing a new neighborhood on the edge of the city with limited access to other City amenities, requires a comprehensive approach to open space planning and design. BPRD has evaluated other Boston neighborhoods with about 10,000 housing units to determine the average quantity and diversity of recreational facilities that should be accommodated at a minimum within the open space system proposed for this site: *Three multi-use / soccer fields: three 60' ball fields; one 90' ball fields: four basketball courts; three tennis courts, and five playgrounds.*

A fully developed active recreation program can be accommodated within the 40 acre open space system proposed for this new neighborhood. Additional open space amenities 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. **66.99**

Public Benefits for Landlocked Tidelands

Suffolk Downs is subject to the Landlocked Tidelands Legislation which requires the Secretary of the Executive Office of Energy and Environmental Affairs (EOEEA) to approve the benefits that support the public's rights to access, use and enjoy tidelands and to identify measures to avoid, minimize or mitigate any adverse impact to ensure rights set forth herein.

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

66.10
0

Phasing of Open Space

The project is proposed with a 15-20 year buildout. *Open space that is required, negotiated or proposed as mitigation for Article 80 or MEPA approval as a public benefit should be implemented in the first phase of development. This will ensure that the public benefit to East Boston is realized in the near term and is not impacted by future amendments to the plan.*

Protection in Perpetuity

The open space proposed in the DEIR/DPIR will be publicly accessible but privately owned. *Open space that is required, negotiated or proposed as mitigation for Article 80 or MEPA approval as a public benefit should be transferred to public ownership or otherwise protected in perpetuity to ensure that it does not change with future amendments to the development plan.*

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.

Sincerely

Carrie Marsh

Carrie Marsh, Executive Secretary
Boston Parks and Recreation Commission

CC: Christopher Cook, Commissioner, BPRD
Liza Meyer, Chief Landscape Architect, BPRD
Jon Greeley, Director of Development Review, BPDA
David Carlson, Deputy Director of Urban Design, BPDA
Tim Czerwienski, Project Manager, BPDA
Page Czepiga, Analyst, MEPA Office

[i] 2011-2015 American Community Survey and the City of Boston GIS system

CITY of BOSTON
Martin J. Walsh, Mayor

To: Tim Czerwienski, BPDA

From: Zach Wassmouth, PWD

Date: December 14, 2018

Subject: Suffolk Downs DPIR - Boston Public Works Department Comments

Included here are Boston Public Works Department comments for the Suffolk Downs DPIR.

Site Plan: 7.1
Developer must provide an engineer's site plan at an appropriate engineering scale that shows curb functionality on both sides of all streets that abut the property and within the project site.

Construction Within The Public Way: 7.2
All work within the public way (existing and proposed public streets) shall conform to Boston Public Works Department (PWD) standards. Any non-standard materials (i.e. pavers, landscaping, bike racks, etc.) proposed within a public way will require approval through the Public Improvement Commission (PIC) process and a fully executed License, Maintenance and Indemnification (LM&I) Agreement with the PIC.

Sidewalks: 7.3
Developer is responsible for the reconstruction of the existing sidewalks on all public ways abutting the project site and, wherever possible, to extend the limits to the nearest intersection to encourage and compliment pedestrian improvements and travel along all sidewalks within the Public Right of Way (ROW) within and beyond the project limits. The reconstruction effort also must meet current American's with Disabilities Act (ADA)/ Massachusetts Architectural Access Board (AAB) guidelines, including the installation of new or reconstruction of existing pedestrian ramps at all corners of all intersections. Plans showing the extents of the proposed sidewalk improvements associated with this project must be submitted to the PWD Engineering Division for review and approval.

The developer is encouraged to contact the City's Disabilities Commission to confirm compliant accessibility within the public right-of-way.

Driveway Curb Cuts: 7.4
Any proposed driveway curb cuts will need to be reviewed and approved by the PIC. The developer is also responsible for the closure of any existing driveway curb cuts abutting the property that are no longer serving active driveways.

Discontinuances: 7.5
Any and all discontinuances (sub-surface, surface or above surface) within the Public ROW must be processed through the PIC.

Easements: 7.6
Any and all easements associated with this project must be processed through the PIC.

Landscaping: 7.7
Developer must seek approval from the Chief Landscape Architect with the Parks and Recreation Department for all landscape elements within the Public ROW. Program must accompany a LM&I with the PIC.

PUBLIC WORKS DEPARTMENT
Boston City Hall • 1 City Hall Sq Rm 714 • Boston MA 02201-2024
CHRIS OSGOOD • Chief of Streets, Transportation, and Sanitation
Phone (617) 635-2854 • Fax (617) 635-7499

Street Lighting:
Developer must seek approval from the PWD Street Lighting Division, where needed, for all proposed street lighting to be installed by the developer in the public ROW, and must be consistent with the area lighting to provide a consistent urban design. The developer should coordinate with the PWD Street Lighting Division for an assessment of any street lighting upgrades that can be considered in conjunction with this project. All existing metal street light pull box covers within the limits of sidewalk construction to remain shall be replaced with new composite covers per PWD Street Lighting standards. Metal covers should remain for pull box covers in the roadway. **7.8**

Roadway:
Based on the extent of construction activity, including utility connections and taps, the developer will be responsible for the full restoration of the roadway sections in the public ROW that immediately abut the property and, in some cases, to extend the limits of roadway restoration to the nearest intersection. A plan showing the extents and methods for roadway restoration shall be submitted to the PWD Engineering Division for review and approval. **7.9**

Project Coordination:
All projects must be entered into the City of Boston Utility Coordination Software (COBUCS) to review for any conflicts with other proposed projects within the public right-of-way. The Developer must coordinate with any existing projects within the same limits and receive clearance from PWD before commencing work. **7.10**

Green Infrastructure:
The Developer shall work with PWD and the Boston Water and Sewer Commission (BWSC) to determine appropriate methods of green infrastructure and/or stormwater management systems within the public right-of-way. The ongoing maintenance of such systems shall require an LM&I Agreement with the PIC. **7.11**

New Roadways:
All new roadway shall conform to the Public Works Department's Roadway Design Standards and layout must be established and approved through the PIC. **7.12**

Please note that these are the general standard and somewhat specific PWD requirements applicable to every project, more detailed comments may follow and will be addressed during the PIC review process.

If you have any questions, please feel free to contact me at zachary.wassmouth@boston.gov or at 617-635-4953.

Sincerely,

Zach Wassmouth
Chief Design Engineer
Boston Public Works Department
Engineering Division

CC: Para Jayasinghe, PWD

Tim Czerwienski <tim.czerwienski@boston.gov>

Recommendation for Suffolk Downs Mitigatiion Compensation to the EB Community

Joseph Arangio Jr [redacted] Wed, Dec 12, 2018 at 10:51 AM
Reply-To: [redacted]
To: Tim Czerwienski <tim.czerwienski@boston.gov>
[redacted]
<jarangiojr@yahoo.com>

Dear Tim,

I submit this email as my letter suggesting appropriate mitigation.

I will be brief.

I am recommending that mitigation compensation to the Orient Heights neighborhood and the East Boston community, as a consequence of the Suffolk Downs Redevelopment Project, consider the following:

(a) Shade tree planting on major streets (e.g., Bennington, Saratoga) from one end of the district to the other end, as well as in squares (Orient Heights, Day, etc.) and Constitution Beach **8.1**

(b) Street/road beautification efforts (e.g., extensive and more dense use of flowers and planters) along major streets, squares, intersections (e.g., Leyden, Bennington, Walley) and Constitution Beach.

(c) An upkeep and maintenance effort for all plantings.

Should this recommendation progress further, I believe the Suffolk Downs IAG can work with you, the developers and relevant staffs to identify the details that would become part of an implementation plan.

In support, I respectfully submit a quoted paragraph from a June 10, 2018 article written by David Abel and published on pages A1 and A12 in the Boston Globe. It speaks to the inadequate tree canopy in Boston.

"To cast light on the problem...[lack of tree canopy in Boston], City Counselors Ayanna Pressley and Matt O'Malley...plan to urge officials to do more to improve the city's canopy and to distribute trees more equitably. 'There's a greater density of trees in some neighborhoods than others,' Pressley said. 'In some of the neighborhoods most vulnerable to climate change, where we need them, we don't have them.' She pointed to East Boston, where only 7 percent of the neighborhood has trees planted, according to the city's most recent report on tree canopy."

Sincerely,

Joseph Arangio Jr.,
IAG Member, Suffolk Downs Redevelopment Project

Tim Czerwienski <tim.czerwienski@boston.gov>

IAG Member Comment

Ernani DeAraujo <[redacted]> Thu, Dec 13, 2018 at 2:54 PM
To: "Tim Czerwienski (tim.czerwienski@boston.gov)" <tim.czerwienski@boston.gov>

Dear Tim:

I write this note in continued support of the proposal by HYM Investments for the development of the former Suffolk Downs site. A few additional notes to add to my previous comments around mitigation:

Housing: HYM has committed to build thousands of new homes to meet the desperate housing shortage in greater Boston. They should continue to work toward developing lower cost and affordable options beyond the 13% dedicated affordable. In particular, they should consider a range of lower cost, lower amenity options such as micro units, rooming houses, and other alternative/flexible living arrangements to provide lower rent market options for a broader range of users. Moreover, they should commit to increase the amount of handicap accessible units throughout their development. Individuals with physical and mental disabilities have very few options for adaptable living spaces and HYM could help address this issue with their affordable and market units. **9.1**

Flexibility/Community Input: Whatever initial plans are approved, there should be flexibility in the 20 year expected development time frame to revisit aspects of the plan for community input. The East Boston community went through a substantial planning effort for our waterfront in the late 1990s and by the time the economy permitted construction (over a decade later), certain aspects of the planning did not reflect the needs or preferences of the new community. I understand that each phase of the development will have its own detailed process and this will enable timely input to ensure that future changes in living patterns, transportation, public health, etc. can be reflected as this private development grows. **9.2**

Thank you for your consideration,

Ernani Jose DeAraujo

68B Horace Street

December 14, 2018

Dear Ms. Czepiga, Mr. Czerwienski, Secretary Beaton, and Director Golden,

Thank you for the opportunity to comment on HYM Investment's DPIR/DEIR filing for the Suffolk Downs Development Project. I support the development of a transit oriented, mixed-use project and ask you to consider the following comments related to their proposal.

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. **10.1**

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. **10.2**

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. HYM 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. **10.3**

HYM 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. **10.4**

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. **10.5**

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. **10.6**

The proponent should commit to a specific number of electric vehicle charging stations. I suggest six per building onsite for a minimum of 288 spaces. 10.7

Transportation

The on and off site circulator buses proposed by the developer should be electric. 10.8

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. 10.9

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 exceed the Inclusionary Development Policy and construct 20% inclusionary housing in both the Boston and Revere parcels, with at least 18% on-site and linkage funds to remain in East Boston. 10.10

The proponent should include additional transit-directed traffic mitigation including a minimum $15m commitment toward the construction of the Blue/Red line connecter for the MBTA. 10.11

The proponent should commit to the creation of a perpetual community benefit fund supported by HYM 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. 10.12

Thank you for considering these comments.

Madeleine Steczynski

Madeleine Steczynski, Suffolk Downs IAG Member
103 Webster Street
East Boston, MA 02128

CITY OF REVERE

Brian M. Arrigo
Mayor

December 14, 2018

Matthew Beaton, Secretary
Executive Office of Energy and Environmental Affairs
100 Cambridge Street 9th Floor
Boston, MA 02112

ATT: Page Czepiga

RE: Project # 137601 -- Draft Environmental Impact Report/Draft Project Impact Report (DEIR/DPIR) for the Redevelopment of Suffolk Downs in Revere and East Boston

Dear Secretary Beaton,

On behalf of the City of Revere, we hereby express our full and unequivocal support for EOEEA approval of the 10.03.18 DEIR/DPIR for the redevelopment of Suffolk Downs. In our view, this document more than adequately identifies, fully evaluates and effectively addresses the beneficial and the potentially adverse environmental and other impacts of this project for the Revere and Boston communities and for the Commonwealth. We, therefore, do not recommend the need for any supplemental filings short of the FEIR/DPIR itself. Quite the contrary, we believe that any requirement for supplemental filings would unnecessarily delay the commencement of a project that has already received the overwhelming support of the Revere community as well as the planning and permitting approval of our elected and appointed public officials.

Our support reflects the many benefits that the redevelopment of Suffolk Downs brings to Revere and its residents, all of which are well described and fully committed to in the DEIR/DPIR itself. It will return to productive use more than 50 acres of our community that are currently vacant and unattractive. It will produce almost 6Msf of on-site development, including significant new residential, commercial, recreational and civic facilities, which will be integrated into a mixed-use urban neighborhood that will be an important new element of the larger Revere community. That mix of uses will be organized around an active and attractive system of fully publicly accessible open spaces, which will represent 25% of the development as a whole. And all of that will be linked by a network of streets, sidewalks and pathways that will be funded, built and maintained by the developer.

The complex will be serviced by a new state-of-the-art utilities grid and a new water and sewer network that will not over-burden our existing infrastructure and will also improve the environmental resiliency of the surrounding neighborhoods. Likewise, the traffic and transportation plans well outlined in the DEIR/DPIR will not only create a new multi-modal and transit-oriented community on-site, but they will at long last address and resolve in whole or in large part a number of major traffic circulation, congestion and capacity problems on the surrounding regional and local roadways that will be of immeasurable benefit to the Revere community and the region as a whole.

At our insistence, the proposed development of Suffolk Downs in Revere will also strike an equal balance between residential and commercial uses. Over the 15-20-year build-out of the project, the former will produce more than 2,500 new rental and ownership housing units for a variety of constituencies; and the latter will produce new retail, restaurant, hospitality, laboratory and office facilities, which importantly include a new hotel and innovation center in the first phase of development. By project completion, this mix of uses will have generated an estimated 7K construction jobs and 15K permanent jobs, in a Revere community whose employment base has been decimated by the recent closures of NECCO as well as the Wonderland dog-racing track and the Suffolk Downs horse-racing track itself. At full build-out, Suffolk Downs will generate $43M of property taxes annually, more than half of Revere's current property tax collections and more than double our current commercial property tax collections. Those tax benefits will far out-weigh the project's municipal tax burdens, which are now conservatively estimated to be $13M annually, less than one-third of estimated new tax revenues. In terms of economic and workforce development as well as municipal finance, the revitalization of the Suffolk Downs property is the answer to Revere's prayers; and it cannot come soon enough.

Beyond those substantive reasons for Revere endorsement of the DEIR/DPIR, there are any number of important procedural reasons to support that document since, in many respects, it emerged from an exemplary public process. It was the result of a continuing community-based collaboration in Revere that both informed its preparation and thoroughly vetted its findings and conclusions. That continuing process began informally during the due diligence period that preceded the purchase of the Suffolk Downs property by the HYM Investment Group in May of 2017; and thereafter it commenced officially with the collaborative preparation of a detailed zoning overlay district for the Revere portion of Suffolk Downs.

The Suffolk Downs Overlay District (SDOD) was approved by the Revere City Council in March of 2018 and is attached hereto for reference. This detailed document was informed by the collaborative nature of the Revere/Boston/HYM response to the Amazon Request for Proposals for a second headquarters site, which reflected and reinforced the cross-jurisdictional scope of the planning process for this crucial site. The SDOD established the basic development and public process parameters for permitting the Revere portion of the Suffolk Downs, zoning requirements that were then incorporated into the preparation of the Master Plan/Planned Unit Development (PUD) for Revere and the DEIR/DPIR for the whole site.

In May of 2018, and pursuant to the requirements of the SDOD, I convened a Project Review Board (PRB) composed of responsible City of Revere officials and a Development Advisory Group composed of a broad cross-section of the Revere community, to participate in the evolution and review of a Master Plan/PUD for Suffolk Downs in Revere, which would then be submitted to the Revere City Council for final approval. I also designated and retained a Peer Review Group (PRG) of experienced and expert consultants to provide professional input and feedback to the DAG and the PRB in fields that included environmental, engineering, urban design and architecture, traffic and transportation and legal matters. Issues and opportunities. The membership of these groups is attached hereto for reference.

The PRB and the DAG each met with the HYM development team in seven working sessions from June through October of 2018. Each of the DAG meetings was open to the press and the public, was recorded and broadcast by Revere TV, and was detailed and documented in meeting summaries and in the related audio-visual presentations that were and are available on the City of Revere and HYM websites. These meetings covered in a quite comprehensive and systematic manner all of the issues that would be also addressed in both the Suffolk Downs Master Plan/PUD and in the DEIR/DPIR. Those discussions informed the preparation of both of those documents as they evolved and were shared with the PRB, DAG and PRG in draft form. This series of working meetings was concluded with a final Community Meeting at the end of October, after which the Suffolk Downs Master Plan/PUD was recommended by the PRB and the DAG to the Revere City Council for its review and approval.

There followed a City Council Public Hearing on November 5th, in which overwhelming community support was expressed for both the Suffolk Downs Master Plan/PUD, which is attached hereto in summary form, and a related PRB Order of Conditions, which is also attached hereto for reference. The latter explicitly incorporated the community benefit and the project mitigation commitments that are included in both the Master Plan/PUD and the DEIR/DPIR. On that basis, the Revere City Council overwhelming approved the Suffolk Downs Master Plan/PUD as a Special Permit on November 26, 2018, thereby completing this critical stage of the project planning and permitting process in Revere.

In sum, the Suffolk Downs Master Plan/PUD was the outcome of a comprehensive, extensive and participatory public and community process that was firmly based on our assessment that the DEIR/DPIR was both adequate and acceptable and provided a reliable foundation at the state level for our approvals at the municipal level. Given this efficient and effective permitting outcome, HYM has now committed to begin the first phase of the Suffolk Downs redevelopment in Revere, and to commence construction before the end of 2019. That will bring to our community and to our residents the initial benefits of this major project on a predictable schedule that will take advantage the currently favorable business and market cycles. To reiterate, we are confident that the DEIR/DPIR as presented provides a more than adequate and acceptable basis for moving this project forward now and in full accord with EOEEA standards and oversight responsibilities. We also believe that additional supplemental filings are unnecessary and would likely significantly and unnecessarily delay the progress of this project, thereby delaying, and perhaps compromising, its benefits for Revere, Boston and the Commonwealth.

We, therefore, again emphasize the City of Revere's support for prompt and positive action by EOEEA action on the DEIR/DPIR for the Suffolk Downs Redevelopment. What is now before you for approval was the outcome of collaboration and coordination not only among Revere, Boston and HYM, but also with a series of state agencies, including DOT, CTPS, DHED, DCR, MBTA and EOEEA, with a variety of neighborhood, environmental, and transportation advocacy groups and organizations and through countless community meetings. In sum, this DEIR/DPIR was the product of an exemplary public and community process; and both the product and the process warrant EOEEA support and commendation.

Sincerely,

Brian Arrigo, Mayor

cc: Governor Charlie Baker
Department of Transportation Secretary Stephanie Pollack
Department of Housing and Economic Development Secretary Jay Ash
Department of Conservation and Recreation Commissioner Leo Roy
MBTA General Manager Steve Poftak and Financial Management Board Chair Joseph Aiello
Boston Mayor Martin Walsh and Boston Planning & Development Authority Director Brian Golden
Members of the Suffolk Downs Project Review Board, Development Advisory Group, Peer Review Group
Members of the HYM Development Team
Members of the Revere City Council

November 13, 2018

Hello,

My name is Gabriela Boscio, Climate Program Manager at NOAH—the Neighborhood of Affordable Housing in East Boston. I'm here on behalf of NOAH, to congratulate the Impact Advisory Group and BPDA staff for taking the initiative to hear from the citizens of East Boston on both their needs and hopes for their community in relationship to the redevelopment of Suffolk Downs, particularly as it relates to climate protection and open space for East Boston residents. We wish the HYM team good luck on this significant venture and we urge dialogue to continue on climate protections even after the BDPA likely grants approval this winter.

The proposed 40+ acres of open space development, designed correctly, certainly can go a long way to helping make the area more resilient to the impacts of climate change, especially flooding. I would like to bring to your attention, however, other issues to consider.

As you may know, for the past several years, NOAH has been helping the neighborhood identify issues and concerns related to sea-level rise, flood protection, excessive heat, and increasingly, emergency preparedness. While we have not concentrated major efforts on Suffolk Downs because the Impact Advisory Group has jurisdiction, we do want to be on the record for a couple items related to community resiliency. Several of these emerged at our own Climate and Flood Protection meetings we held with the neighborhood in May and in September. We will be issuing a Community Report in January. Right now we have a couple questions:

1. Belle Isle Marsh is a major community asset. Any plans to protect the new Suffolk Downs must not harm this local biodiverse and open space treasure. We are certain you have thought about it but how can Suffolk Downs guarantee its plans will meet these criteria? 12.1

2. We have seen drafts which allude to a berm along Bennington St. with flood gates along Bennington St. that protect Suffolk Downs. Has Suffolk Downs or DEP analyzed those plans to see if they may harm Belle Isle Marsh? 12.2

3. We might agree the berm might be a very nice green asset to the community. Perhaps part of a bike or walking trail connected to Belle Isle Marsh and Suffolk Downs. If it is an asset to protect Suffolk Downs, can you tell us now if Suffolk Downs would be paying for this protective measure? 12.3

4. We know that there are thoughts about expanding the roadway on Rte 1. While we don't have comments on traffic, we do wonder what protections will be in place on the Chelsea Creek side so that the oil tanks do not become a hazard to the whole of East Boston? Sales Creek used to flow between the Creek and Belle Isle Marsh, so we are wondering where the rising waters go? 12.4

5. We don't have knowledge of how the housing within Suffolk Downs will be developed but we do wonder if you plan on raising it up so that it meets at least 2070 sea level rise projections? We are raising up our own housing along the Harbor and Chelsea Creek. 12.5

6. Will the community have access to any kayaking or canoeing opportunities on site? 12.6
7. Can NOAH youth participate with the HYM team in programming for these recreation, climate and open space areas? 12.7

Thank you for your time and efforts on this major redevelopment effort. Please keep us on your list of Climate and Resiliency plans.

On behalf of NOAH,

Gabriela A. Boscio Santos
Climate Program Manager
Neighborhood of Affordable Housing

13 de noviembre de 2018

Hola,

Me llamo Gabriela Boscio, Gerente del Programa Climático de NOAH (Neighborhood of Affordable Housing) en East Boston. Estoy aquí en nombre de NOAH, para felicitar al Grupo Asesor de Impacto y al personal del BPDA por tomar la iniciativa de escuchar a los ciudadanos de East Boston sobre sus necesidades y esperanzas para su comunidad en relación a la reurbanización de Suffolk Downs, particularmente en cuanto a la protección climática y el espacio abierto para los residentes de East Boston. Le deseamos mucha suerte al equipo de HYM en esta importante iniciativa y esperamos que el diálogo sobre protecciones climáticas continúe, incluso después de que el BDPA probablemente otorgue su aprobación este invierno.

Esta propuesta con más de 40 acres de espacios abiertos, diseñado correctamente, sin duda puede ayudar mucho a que el área sea más resistente a los impactos del cambio climático, especialmente a las inundaciones. Me gustaría dirigir su atención, sin embargo, a otras cuestiones a considerar.

Como sabrán, durante los últimos años, NOAH ha ayudado al vecindario a identificar problemas e inquietudes relacionadas con el aumento del nivel del mar, la protección contra inundaciones, el calor excesivo y, cada vez más, la preparación para situaciones de emergencia. Si bien no hemos concentrado esfuerzos significativos en Suffolk Downs debido a que el Grupo Asesor de Impacto tiene jurisdicción, sí queremos estar en el registro sobre un par de artículos relacionados con la resiliencia de la comunidad. Varios de estos surgieron en nuestras propias reuniones sobre el clima y la protección contra inundaciones que celebramos con el vecindario en mayo y en septiembre. Estaremos publicando un Informe Comunitario en enero. En este momento tenemos un par de preguntas:

1. Belle Isle Marsh es una parte importante de la comunidad. Cualquier plan para proteger a Suffolk Downs no debe dañar la biodiversidad local de este tesoro de espacios abiertos. Estamos seguros de que lo han pensado ya, pero ¿cómo puede Suffolk Downs garantizar que sus planes cumplan con estos criterios?

2. Hemos visto borradores que aluden a una berma a lo largo de Bennington St. con compuertas a lo largo de Bennington St. que protegen a Suffolk Downs. ¿Suffolk Downs o DEP analizaron esos planes para ver si pueden hacerle daño a Belle Isle Marsh?

3. Podríamos estar de acuerdo en que la berma podría ser una opción verde muy buena para la comunidad. Quizás como parte de una ciclo-vía o sendero para caminar conectado a Belle Isle Marsh y Suffolk Downs. Si es para proteger a Suffolk Downs, ¿puede decirnos ahora si Suffolk Downs pagaría por esta medida de protección?

4. Sabemos que se ha considerado la expansión de la carretera en la Ruta 1. Si bien no tenemos comentarios sobre el tráfico, nos preguntamos qué protecciones se implementarán en el lado de Chelsea Creek para que los tanques de petróleo no se conviertan en un peligro para todo el East Boston? Sales Creek solía fluir entre Chelsea Creek y Belle Isle Marsh, así que nos preguntamos a dónde irán las aguas a medida que vayan subiendo.

5. No tenemos conocimiento de cómo se desarrollarán las viviendas dentro de Suffolk Downs, pero nos preguntamos si planean elevarlas para que cumplan al menos con las proyecciones de aumento del nivel del mar para 2070. En NOAH, estamos levantando nuestras propias viviendas a lo largo del puerto y Chelsea Creek.

6. ¿Tendrá la comunidad acceso a oportunidades de kayak y el uso de canoas?

7. ¿Pueden los jóvenes de NOAH participar con el equipo de HYM en la programación para estas áreas de recreación y espacios abiertos?

Gracias por su tiempo y esfuerzo en este importante proyecto de redesarrollo. Por favor, consérvenos en su lista de planes de Clima y Resiliencia.

En nombre de NOAH,

Gabriela A. Boscio Santos
Gerente del Programa Climático
Neighborhood of Affordable Housing

December 12, 2018

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

Dear Mr. Czerwienski:

I am writing to express my strong support for the HYM / Suffolk Downs Redevelopment project. The proposed project will redevelop the former Suffolk Downs racetrack into a new vibrant community. This new community will include new housing (including affordable housing) as well as commercial development & a beautiful 40 acre public park network. The proposed housing will include apartments, townhouses, senior housing and condos.

HYM has done extensive outreach in East Boston & the process has been very transparent.

Overall, I support the redevelopment of the Suffolk Downs site and look forward to it becoming part of East Boston.

Thank you for your consideration.

Sincerely Yours,

Jim Kearney

President-Elect, East Boston Chamber of Commerce

LivableStreets
Connecting People + Places
livablestreets.info
70 Pacific Street ▪ Cambridge, MA 02139 ▪ 617.621.1746

December 13, 2018

Matthew A. Beaton, Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
100 Cambridge Street, Suite 900
Boston, MA 02114

Brian Golden, Director
Boston Planning and Development Agency
Boston City Hall
Boston, MA 02201

From: LivableStreets Alliance
Re: Suffolk Downs Draft Environmental Impact Report

DEIR:
Volume 1: http://www.bostonplans.org/getattachment/11089669-d1f5-458a-9e50-9da28b620344
Volume 2: http://www.bostonplans.org/getattachment/d34605b5-4dea-4898-a232-b356501dbaf9

Dear Secretary Beaton and Director Golden,

Thank you for welcoming comments on the Draft Environmental Impact Report for the Suffolk Downs Redevelopment. LivableStreets sees this site as essential to the promotion of our three key initiatives: Vision Zero, Better Buses, and the Emerald Network. We believe that a site of this magnitude provides an immense opportunity for the State of Massachusetts and the City of Boston to lead the way on progressive planning and design that meets state and municipal goals on sustainability, climate resiliency, and equitable development.

Given the scale of this site (161 acres), we believe that the proponent's overall site design will help integrate this large parcel into the surrounding neighborhoods by establishing a new street network between and around buildings that encourages mobility and livability at an appropriate scale. The inclusion of a network of dedicated spaces for cyclists and pedestrians to maneuver around the site reflects a commitment to building an inclusive and people-centered space. In certain circumstances, the proponent has included traditional on-road bike lanes and we would encourage you to consider the breadth of benefits those spaces would better serve as protected bike lanes. We are also supportive of the inclusion of new Bluebikes stations throughout the site as a means of encouraging mode shift towards sustainable transportation and expansion of a well-utilized existing system.

We are excited to see that the proponent will be investing over $60 million into the creation of a 40-acre publicly accessible open space system that includes both active and passive recreation areas and floodable wetlands. We believe that this will provide both environmental and quality-of-life benefits to the surrounding communities. We are especially excited to see a commitment to building out a 20' community path between Constitution Beach and Revere Beach, a segment that is outlined as a

connection in our Emerald Network Initiative, a vision to build 200-plus miles of connected greenways in Greater Boston.

Alongside our support for these transportation considerations, we would also like to express concern about the following, which we hope the proponent will respond to before the Final Environmental Impact Report:

Parking
While we are supportive of monitoring parking demand over the course of the project build-out, we believe that construction of initial parking induces demand and skews parking demand figures by giving the impression that parking is widely available on-site. Any action that creates an oversupply of parking and induces demand for personal vehicles is in direct opposition to the goals of TOD, climate resiliency, and mode shift away from driving personal vehicles.

The proponent is proposing 15,250 parking spaces for this site, mostly in structured garages. This number includes the 6,620 parking spaces required by the City of Revere parking ratios, but the remaining 8,630 parking spaces exceeds the number proposed under the City of Boston parking ratios. The proponent is requesting maximum parking ratios for office/lab that are twice the ratio the City of Boston proposed for this site. The proponent suggests that meeting the lower parking ratios would be "difficult," but provides no explanation for why this would be difficult in a TOD site uniquely served by existing transit.

Also included in the proposed 15,250 parking spaces are 557 on-street parking spaces, which the proponent identifies as free time-limited spaces. We question the choice to make these spaces free as opposed to metered, which would provide revenue to the municipalities and have the potential to encourage greater parking turnover rates.

We are concerned that advantages provided by creating people-centered open space and recreational spaces within the site will have reduced benefit and impact if the site is built to accommodate and encourage a plethora of personal vehicles. 14.1

Public Transportation
The proponent proposes operating a privately owned but publicly accessible shuttle service, running shuttles on a loop within the site as well as between the site and North Station, South Station, Chelsea Station, and the Seaport. While this is a generous suggestion and acknowledges shortcomings in the existing MBTA service, we believe this agreement needs further clarification in terms of how often these services would run, how many years the proponent commits to operating these services, and how accessibility and seamlessness within the MBTA systems will be ensured.

While we are happy to see the proponent offering over $50 million in off-site traffic mitigation measures, those mitigation measures seem to demonstrate little benefit in the 2038 build scenario based on intersection LOS and vehicle delay times. Even with the 2038 build conditions with mitigation, the proponent acknowledges that all bus routes will have increased delay times and the 119 bus will have times during the day when it exceeds the policy capacity and at times exceeds the crush capacity.

The proponent further acknowledges that in the 2038 build condition, they expect public transit use of 39%; however, the Go Boston 2030 goal for increased transit ridership is 44%. Similarly, the 2038 build condition expects single occupancy vehicle use of 35%; however, the Go Boston 2030 goal is to reduce single occupancy vehicle use to 20%.

Given the acknowledged reduction in LOS for MBTA bus riders and the projection of not meeting Go Boston 2030 goals even eight years after the goal deadline, we encourage the proponent to return to the drawing board alongside the City of Boston, MassDOT, and the MBTA to consider how this site can be a better TOD site that meets state and municipal goals for mode shift and climate resiliency. We encourage the proponent to consider direct investments in the MBTA Blue Line to maintain the LOS at an A at both Suffolk Downs and Beachmont Stations. We also encourage the proponent to consider targeted investments in East/West transit options including increased bus services and bus priority lanes. Finally, we encourage the proponent to work alongside the City of Revere and the MBTA to consider the construction of a previously proposed commuter rail station along the Rockport Line. 14.2

Environment/Housing
In solidarity with several of our community partners and with an understanding of the intricate link between transportation, housing, the natural environment, public health, and urban livability, we ask that the proponent consider the following:

On a site this large and served by transit and emerging jobs we think it should be a priority for the region that this site include more than the City of Boston mandated 13% inclusionary affordable housing. 14.3 In addition, we are concerned that the proponent has not considered the possibility of building the site as a microgrid, or considered the possibility of building out passive housing or net zero buildings. These types of equity, energy, and environmental concerns would establish this site as a unique cutting-edge development demonstrating the potential for future energy independent sites. 14.4

While we applaud the considerations for building connections from the site across Bennington Street to both Belle Isle Marsh and Constitution Beach, we encourage the proponent to give similar consideration to Chelsea Creek. The proponent's plans to reconstruct Route 1A as a "Super Street" are counter to encouraging access to Chelsea Creek and show a preference for expanding personal vehicle traffic which is counter to all of the region's climate and resiliency goals. We encourage the proponent to consider ways that the redesign of Route 1A can include safe and accessible crossings for pedestrians and cyclists that prioritize public access to potential future open space along Chelsea Creek. 14.5 We are further concerned that the proposals for redesigned Bennington Street and Route 1A are not fully considering the impacts of sea level rise through design that elevates those edges and creates a truly resilient site. 14.6

Sincerely,

Tony Lechuga
Emerald Network Program Manager | LivableStreets

Tim Czerwienski <tim.czerwienski@boston.gov>

Letter of Support: HYM / Suffolk Downs Redevelopment project.

VROCC [redacted] Thu, Dec 13, 2018 at 12:49 PM
To: tim.czerwienski@boston.gov, page.czepiga@state.ma.us

Veronica Robles Cultural Center
175 William F. McClellan Highway, East Boston, MA 02128
www.vrocc.org / (781) 558-5102

December 12, 2018

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

Dear Mr. Czerwienski:

I am writing to express my strong support for the HYM / Suffolk Downs Redevelopment project. The proposed project will redevelop the former Suffolk Downs racetrack into a new vibrant community. This new community will include new housing (including affordable housing) as well as commercial development & a beautiful 40 acre public park network. The proposed housing will include apartments, townhouses, senior housing and condos.

I understand that HYM has done extensive outreach in East Boston & the process has been very transparent.

Overall, I support the redevelopment of the Suffolk Downs site and look forward to it becoming part of East Boston.

Thank you for your consideration.

Sincerely Yours,

Veronica Robles

Director and Co-Founder

Veronica Robles
Verónica Robles Cultural Center (VROCC)
175 McClellan Highway, East Boston, MA 02128
P: (781) 558-5102
E: vroccboston@gmail.com
Twitter/VroccBoston
Instagram/VroccBoston

Facebook/Veronica Robles Cultural Center

Tim Czerwienski <tim.czerwienski@boston.gov>

Suffolk Downs Comment Letter

Alex DeFronzo [redacted] Fri, Dec 14, 2018 at 8:25 PM
To: Tim Czerwienski <tim.czerwienski@boston.gov>, "page.czepiga@mass.gov" <page.czepiga@mass.gov>

December 14, 2018

Dear Ms. Czepiga, Mr. Czerwienski, Secretary Beaton, and Director Golden,

Thank you for the opportunity to comment on HYM Investment's DPIR/DEIR filing for the Suffolk Downs Development Project. I support the development of a transit oriented, mixed-use project and ask you to consider the following comments related to their proposal.

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. 16.1

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. 16.2

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. HYM 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.

HYM 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. 16.3

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. 16.4

The proponent should commit to a specific number of electric vehicle charging stations. I suggest six per building onsite for a minimum of 288 spaces. 16.5

Transportation

The on and off site circulator buses proposed by the developer should be electric. 16.6

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. 16.7

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 exceed the Inclusionary Development Policy and construct 20% inclusionary housing in both the Boston and Revere parcels, with at least 18% on-site and linkage funds to remain in East Boston. 16.8

The proponent should include additional transit-directed traffic mitigation including a minimum $15m commitment toward the construction of the Blue/Red line connecter for the MBTA. 16.9

The proponent should commit to the creation of a perpetual community benefit fund supported by HYM 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. 16.10

Thank you for considering these comments.

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Alex DeFronzo
Executive Director
Piers Park Sailing Center
95 Marginal St.
East Boston, MA 02128
http://piersparksailing.org
[redacted]

Piers Park Sailing Center
EAST BOSTON

#SailPPSC #SailEastie

December 14, 2018

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

Dear Mr. Czerwienski:

I am writing to express my strong support for the HYM / Suffolk Downs Redevelopment project. The proposed project will redevelop the former Suffolk Downs racetrack into a new vibrant community.

This new community will include new housing (including affordable housing) as well as commercial development & a beautiful 40-acre public park network. The proposed housing will include apartments, townhouses, senior housing and condos.

HYM has done extensive outreach in East Boston & the process has been very transparent.
Overall, I support the redevelopment of the Suffolk Downs site and look forward to it becoming part of East Boston.

Thank you for your consideration.

Sincerely Yours,

Mirna Orellana
Presidente
New England Salvadoran-American Day Foundation Inc. (509(c)(2) nonprofit)

New England Salvadoran-American Day Foundation Inc.
2 Neptune Road #416 East Boston MA 02128
Tel 617-650-7187 Fax 1-800-886-4530

December 14, 2018

Matthew Beaton, Secretary
Executive Office of Energy and Environmental Affairs (EEA)
ATTN: MEPA Office
100 Cambridge Street, Suite 900
Boston MA 02114

Brian Golden, Director
Boston Redevelopment Authority
One City Hall Square
Boston, MA 02201-1007

RE: Comments on the DEIR/DPIR for the Suffolk Downs Project
MEPA: #15783

Dear Secretary Beaton and Director Golden:

Thank you for the opportunity to review and comment on the Suffolk Downs project. We offer the following comments on the project's pedestrian environment, which overall is well addressed.

The project offers generous walking opportunities

The heart of the proposal is a 15-acre park – the Central Common – with walkways surrounding the site and connecting into and through the open space it provides. The Common has been designed as a one-mile running/walking loop. The park has water features with one pond that can be used for skating and another elongated pond that connects into the nearby saltwater Belle Isle Inlet. The Common connects on either end to meeting and performance spaces on plazas leading to the two Blue Line stations.

Main Street, a second north-south walkway, also connects Beachmont and Suffolk Downs Blue Line stations. This street will have wide, landscaped walkways with setbacks to allow for sidewalk cafes and other such uses along its route.

A third walkway, the Active Linear Corridor, parallels Main Street and runs midblock between Main Street and Tomasello Drive. This pedestrian-only street is intended to provide a series of active play spaces for all ages. The proposal is an extraordinary experiment – a half-mile long area that gives nearby space for casual and active uses. Figure 3.37 lists the potential uses of the corridor as active play, jumping mounds, rolling course, flex turf, climbing health, ping pong and jungle gym. Many of these are likely intended for children.

An additional north-south community trail skirts Tomasello Drive and is shown as a two-way bike facility that follows a swale on the side of the property facing the gas tanks, coupled with a sidewalk on the opposite side of the street.

There are several cross streets that connect the four north-south walkways. They vary in scale and importance. Several contain landscaped walkways and add to the many opportunities for walking throughout the project area.

One concern we ask the developer to address with respect to this generously scaled set of pedestrian ways and open spaces is that the play areas along the Active Linear Corridor (with the exception of the block near Waldemar Avenue) are located within blocks intended to be developed not for housing, but office uses, where presumably there will be few children in nearby buildings. As development occurs within the project, the proponents should ascertain if the proposed Active Linear Corridor is located appropriately to serve the intended users who may be living in residences on-site. Active recreational facilities for small children might be more appropriate lining the loop road at the eastern edge of the proposed Common. This route directly serves the three residential areas near the proposed Beachmont Plaza, the Belle Isle Plaza and the "Panhandle" near Route 1A. This route would strengthen the opportunities for residents to use the Common and its central meeting places as well. 18.1

East Boston Greenway extension

WalkBoston encourages the proponents to seriously consider a connection to the East Boston Greenway. 18.2 The existing East Boston Greenway ends at the Belle Isle Marsh, near the Suffolk Downs MBTA station but on the other side of Bennington Street from the station. There is a roadside path/sidewalk paralleling Bennington Street between the main entrance to the marsh reservation and the crosswalk to the Suffolk Downs transit station. This path is used two-way by both cyclists and pedestrians. Extending the path further north toward Revere Beach is not an easy task. The frontage of Bennington Street is spacious and possibly could be the location of an extended route until reaching Everard Street in Revere, where the Bennington route narrows down on the approach to the Beachmont station at Winthrop Avenue.

A potential alternative location for extending the East Boston Greenway that was suggested in the DEIR exists in the large tract of land between the MBTA rail tracks and the Suffolk Downs property line. This land is nearly 10 acres of unused space and has no buildings on it between the Suffolk Downs transit station and Washburn Avenue in Revere. Depending on ownership the tract might be made available. If owned by the MBTA, the property might become available to the developer, who could include a north-south path that would be available as a substitute for the Bennington Avenue route and link the property into the regional Greenway network as a principal route in the system.

Possible new walking connections into Orient Heights from the project site

A decision has been reached with neighborhood residents that vehicular access between the project site and Orient Heights will not be provided. Several walking issues should be addressed to overcome this lack of street connection.

1. Walley Street and the Suffolk Downs MBTA station

   Walley Street, just off Waldemar Avenue, is the current road and pedestrian access point to the Suffolk Downs transit station for Orient Heights residents. This approach currently works for all access to the neighborhood, and the proposed development adjacent to it respects existing neighborhood preferences and adds no vehicular access to the existing site. Instead the proposal adds a new access route for vehicles and shuttle buses to drop off transit-riders from the new development as close as possible to the transit station; this connection appears to be a part of the proposed Belle Isle Plaza. It is a bit unclear how this new connection will meet with existing streets and paths, and the developer, the City of Boston and the MBTA will need to coordinate the proposed new access with the existing street and path layout. 18.3

2. South project boundary – Waldemar Avenue

A community path along the full length of the south project boundary (approximately ½ mile long) connects the bus stop on Route 1A with the Suffolk Downs MBTA station at Walley Street. This is a good walking connection for East Boston/Orient Heights residents, as it provides connections to transit in two directions. From the Suffolk Downs station to a location about halfway between the MBTA station and Route 1A, an on-site road (also called Waldemar Avenue) parallels the path. It will be lined with small residential buildings backing onto the path. The Waldemar Avenue/Tomasello Drive intersection is well located to connect pedestrians into Orient Heights via the sidewalks of the Orient Heights public housing project and especially via Crestway Road, a short street that links to Faywood Avenue and directly to the Manassah Bradley School.

3. Safe walking access to schools

The proponents include no discussion or description of schools and safe routes to schools. For any students who are attending nearby schools, walking to school should be safe and convenient. The proponents of the project should work with both the City of Boston and the City of Revere to assure safe passage for all students living in Suffolk Downs and using local schools. 18.4

WalkBoston suggests additional examination of the role of schools on the walking paths proposed for the development. Students attending the Bradley School from both Suffolk Downs and Orient Heights would be well served by a neighborhood connection to the proposed path network. In addition, we suggest looking at whether a playfield that includes active recreation uses could be located where Crestway Road meets Waldemar Avenue (Block 5 on Figure 3.7). A playfield located here could serve both the school and the new neighborhood at a logical intersection of the walkways that are such a positive element of the project.

For children living in the Boston portion of the Suffolk Downs neighborhood, access to schools in the Orient Heights neighborhood will be somewhat constrained because there is no vehicular access between the two neighborhoods, other than the route provided by going out from Waldemar Avenue onto Route 1A between Tomasello Drive and Boardman Street.

The closest Revere school is the Seacoast School, located on Bennington Street, which can be reached from Suffolk Downs only by an indirect route through the Beachmont transit station and by sidewalks for a further 1000 feet. The Garfield Elementary and Middle School is about 1500 feet north of Winthrop Avenue. Revere High School is located approximately one mile north of Winthrop Avenue.

Route 1A along the western border of the project area

WalkBoston has significant concerns about the proponent's plans for the Route 1A corridor. Adding a third vehicular travel lane in each direction and increasing roadway capacity from 2,100 to 3,300 vehicles in each direction – an increase of 57 percent – threatens to undermine the ambitious transit-oriented development goals the proponent expresses elsewhere in the proposal. Increased vehicular traffic will also mean more greenhouse gas emissions and more risks to pedestrian and bicyclist safety. We question the need for more vehicular travel lanes on Route 1A between Furlong Drive and Boardman Street, as most southbound traffic on Route 1A will likely access and exit the project site via Route 145/Winthrop Avenue, rather than the proposed "super street" corridor. Similarly, because of the extensive footprint of the Tomasello Drive intersection with Route 1A, we assume that the proponents are anticipating that most of the northbound Route 1A traffic into the site will enter via Tomasello Drive and exit via the same intersection. 18.5

The proposal to add more vehicular travel lanes within the existing roadway footprint will also undermine pedestrian and bicycle accommodations along Route 1A. Adding lanes will likely require narrowing or eliminating the current highway median, which would otherwise provide an important pedestrian refuge at the new proposed crossings at Tomasello Drive and Furlong Drive. Absent such a refuge, pedestrians will be forced to cross six highway travel lanes at once, which increases safety hazards and diminishes connectivity between the project site and development and recreation opportunities along the Chelsea Creek. Adding travel lanes while maintaining a five-foot roadway shoulder also reduces the space available for truly safe and protected bicycle facilities. The current proposal for a narrow five-foot unprotected shoulder alongside fast-moving highway traffic does not provide any meaningful protections for cyclists.

Instead of the "super street" concept, we encourage the proponents to reconsider Route 1A as a truly multimodal transportation corridor, with no new travel lanes except those built as dedicated pull-offs for buses on both the northbound and the southbound sides of Route 1A. This will further advance the proponent's vision for transit-oriented development, while also maintaining space for protected pedestrian facilities in the median of Route 1A. Dedicated bus pull-out lanes also provide for increased bus service. As part of such a plan, the proponent should commit to improved bus stop facilities along Route 1A, including benches and shelters. Pull-outs for bus lanes and bus stop facilities should be considered for replacement of the existing unsafe bus stops at Furlong Drive, the jug handle at the tank farm, Tomasello Drive and Boardman Street. 18.6

Pedestrian access to Route 1A bus connections

Existing conditions for pedestrians and bus riders on 1A are terrible. We are glad that there are proposals that provide safe access for pedestrians to bus stops on Route 1A, including new pedestrian crossings at Tomasello Drive and Furlong Drive. The principal users of bus services may be most concerned about access at Tomasello Drive. The existing Tomasello Drive intersection is proposed to be divided into two components – one for traffic entering Suffolk Downs from Route 1A and the other for traffic exiting Suffolk Downs onto Route 1A.

Pedestrians from both Waldemar Avenue and Suffolk Downs are affected in a dramatic way by this proposal, which would add a bus stop island for northbound buses on Route 1A, a pedestrian island between the travel lanes for traffic exiting the site onto Route 1A, and a right-turning slip lane for traffic entering the site from Route 1A. We encourage the project proponents to also consider a more conventional T design for this intersection, similar to what exists now. 18.7

Under the proposed new configuration, most pedestrians will approach the intersection on the south side of Tomasello Drive, as that is the path that connects to the residential areas in the "Panhandle" of Suffolk Downs, as well as the homes in Orient Heights. The bus stop on the Suffolk Downs side of Route 1A would be located directly adjacent to the Tomasello Drive exit lanes onto Route 1A. Getting to the bus stop would require passengers to cross the right-turning slip lane from Route 1A to reach the bus stop island. The crossing of the slip lane is likely to be more dangerous for pedestrians than other crossings, as traffic entering the site may not be stopped by the Route 1A signals. This should get more attention in final designs; one option would be to install a signal protecting pedestrians and a crosswalk. 18.8

Pedestrians crossing Route 1A are primarily bus passengers using southbound Route 1A bus services. They, too, are required to cross the potentially dangerous slip lane from Route 1A into Tomasello Drive, along with the southbound lane that serves traffic exiting from Tomasello Drive. Pedestrians would halt on the island between the travel lanes exiting the site and cross directly to the bus stop on the west side of Route 1A. This movement can be made concurrently with the signal phase allowing exiting traffic to 18.9

move from Tomasello Drive onto Route 1A. Designers of the traffic flow for this intersection must consider the possibility that walkers cannot cross without a median break that affords refuge and safety for pedestrians who cannot cross in one signal phase. 18.9 cont.

Offsite mitigation for pedestrians and bicyclists

The project proponents outline an extensive program for offsite traffic mitigation in Section 6.10 of the DEIR, detailing numerous operational improvements for motor vehicles broken down by specific locations and intersections. Pedestrian and bicycle improvements are described only briefly and in largely general terms at the end of this section. We encourage the proponents to provide more detailed plans in the FEIR for pedestrian and bicycle improvements at the same locations and intersections they are prioritizing for offsite traffic mitigation. 18.10

Thank you again for this opportunity to comment on the proposals that affect pedestrians in the Suffolk Downs project.

Sincerely,

Wendy Landman
Executive Director

Cc: Bob O'Brien, City of Revere
Page Czepina, MEPA Office
Tim Czerwienski, Boston Planning and Development Agency

December 17, 2018

Brian P. Golden, Director
Boston Planning and Development Agency
One City Hall Square, Ninth Floor
Boston, MA 02201
Delivered via email: tim.czerwienski@boston.gov

RE: Draft Project Impact Report (DPIR)
Suffolk Downs Redevelopment Project

Dear Director Golden:

We are pleased to submit these comments on the Draft Project Impact Report for the Suffolk Downs Redevelopment Project both on behalf of GreenRoots, a local environmental justice non-profit organization which advocates on behalf of low income communities and communities of color in the immediate area.

HYM Investment Group's expansive proposal for the former Suffolk Downs Race Track with a proposed 20-year build out plan represents perhaps the largest single development in Boston since the filling and development of the Back Bay. Unlike that effort the transformation of Suffolk Downs will be designed, implemented, owned and managed by one company. It is also happening at a critical moment in the city's history as the growth of its population brings us close to numbers approaching our historic demographic high water mark of the post-war period, while the literal high water mark along our coasts are evincing the effects of climate change. As such this project carries on it a unique burden of opportunity that must be prudently evaluated and carefully vetted to ensure that the mistakes of the past are not repeated and that the prospect of creating a development that positons both the City and State as leaders of urban development in the 21st century is maximized to the benefit of our residents.

Given the historic and transformative nature and scale of this project it is unreasonable to expect a single developer to be able to address all the issues that are of concern to the public within the limited outlook of their own balance sheets. Accordingly, the suggestions and observations below are directed not only at HYM Investments but to officials at the State and the City. It will require a collaborative effort of the private and public sectors to ensure that the long term public good takes a priority over the expediency of profit. The developer is entitled to make money from their investment, however it is the public of the Commonwealth and residents of the City that will have to live with the decisions made. We will be looking to both the developer and the City and State to ensure that this opportunity is maximized for the residents of Boston today and for future generations.

<u>Environmental Justice/Enhanced Outreach</u>
It is our understanding that the project does not trigger an enhanced Environmental Justice Analysis under the current Environmental Justice policy of the Massachusetts Executive Office of Energy and Environmental Affairs, despite it being completely surrounded on all sides by state-defined Environmental Justice census blocks and the project undoubtedly having a major impact on the daily

lives of the people in those blocks, however it does reach the threshold for enhanced outreach. The project proponent has hosted a large number of presentations and once failings were pointed out earlier in the process, they improved their efforts to reach out to the EJ communities of the area, including appearing on Spanish-language media. The public presentations have provided a degree of simultaneous interpretation and one night of the recent series of presentations was dedicated to the Spanish-speaking community.

While recognizing and appreciating these efforts, we have to point out that this has fallen far short of what we consider "enhanced outreach" (granted, it would be helpful for project proponents and EJ communities alike if the MEPA office could provide some better standards to define "enhanced outreach"). In particular, we have heard from bilingual audience members who have used the interpretation that not all of the content of the presentations were completely or accurately interpreted. During the referenced presentation for the Spanish-speaking community, the original interpreter could not attend and a substitute interpreter provided a degree of interpretation, however most of the evening, including the questions and answers, devolved into English. The headset/transmitter equipment used for the presentations frequently failed or were overwhelmed with static.

We would recommend that the proponent 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.

Beyond the project proponent, the effort at enhanced outreach could be facilitated by the Boston Planning and Development Agency (BPDA) by providing some basic information to an audience that is not conversant with public processes having recently immigrated to this country and/or never having been engaged in municipal and state planning processes. Particularly, there were a number of questions very pertinent to the EJ community focusing on displacement effects of the project and the affordable housing requirements of the project that would have been better served by City staff providing Spanish language materials about the City's Inclusionary Development Policy and answering questions about that general program rather than having the project proponent have to face questions to which he could only answer that he was complying with the City's requirements.

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.

19.1

We recognize the challenges of performing enhanced outreach in EJ communities and are more than willing to work with the City and the Project Proponent to assist in whatever way that we are able and is appropriate. That being said it is our opinion that at this point in the process the outreach to EJ communities has been inadequate.

Transportation

A project of this size will have sizeable impacts on transportation concerns in an area where the air quality and quality of life is already severely affected by commercial and passenger vehicular and air traffic. Existing transit systems suffer from a generational lack of investment on the part of the State and

a comprehensive, regional vehicle traffic plan for the northeast approach to Boston has eluded State planners since the cancellation of the northeast expressway nearly 50 years ago.

Locally, the City of Boston is beginning a process of master planning for the neighborhood, however after over a decade of rapid and nearly unfettered growth in East Boston the traffic situation has become nearly inoperable for the current residents, let alone the thousands more represented by this project. The clash between regional and airport traffic priorities, and the local community has recently come into sharper focus as the reconfiguration of the entrance to the Sumner Tunnel has highlighted the conflict between the needs of regional traffic access to Boston from the North Shore, the increasing volume of traffic to and from the growing Logan International Airport and the needs of local residents trying to get from one side of their community to the other.

Within this context the Suffolk Downs Project will clearly have a difficult time defining mitigating measures as the baseline conditions are unacceptable to begin with. So to reiterate, we look to the City and the State to avail itself of this opportunity to implement solutions which will work in tandem with the mitigation efforts that will be required of this one project, and to not expect or present this project as if it, on its own, will resolve long-recognized transportation problems beyond its 161 acres. That being said, we do have these comments about the DPIR's transportation proposals.

Roadways

The project proponent has presented an array of off-site transportation solutions that will mitigate the impact of added traffic to and from the site. This includes roadway improvements at 30 different locations at a cost of $50 million. While some of these improvements could indeed be done for low cost, we highly doubt that this quantity of money is enough to realize all of these projects. It is unclear whether the projects would be aided by State funds or whether only a subset of these projects will be prioritized and realized. We would ask MassDOT for a detailed analysis of these projects from both a logistical/financial point of view (is this enough money for this list of projects?), as well as from a regional transportation point of view which would put these projects within the context of the State's existing long term plans for the transportation infrastructure of this region. From the City we would expect a similar report from the Boston Transportation Department (BTD) in regards to the local traffic improvements. 19.2

Of the various roadway projects proposed, the Route 1A improvements are particularly of interest, as it's not clear how or if the new alignment is possible or would work in the manner described. We would like to see an analysis of the proposal from MassDOT with a focus on both the practicalities of squeezing in two more lanes on this stretch of road, as well as the financial burden this would represent. 19.3

Transit

The proponent has focused on the Transit Oriented Development (TOD) aspect of this project as one of its largest benefits. Having two Blue Line MBTA stations does represent a great opportunity. The ridership data used in the DPIR relies on MBTA/CTPS data which we have found to be of questionable quality in some instances (e.g., recent ridership data on the Route 111 bus was very questionable). The data on Blue Line capacity looks quite suspect. According to the data presented, the Blue Line is far below its "crush capacity" and the proponent's analysis does not see the new development, as well as factoring in for growth from additional developments in the area, being a problem. These data (as represented in the Passenger volumes at peak load point graphics – figures 6.27a-c) do not reflect the reality currently experienced by the Blue Line riders today. At rush hour the trains are full to capacity and riders frequently must wait for one or two trains to go by before finding a wagon with standing

room. Whether this may be attributed to days when service failures have taken a train out of service, the reality is that this is what the service is like. Attendees at the project presentations have collectively gaped at the data presented from CTPS as it has not reflected the Blue Line that they use regularly. We would like to see a better analysis of the current rider experience and whether this falls on the proponent or MBTA, these data need to be collected by an independent third-party. We urge the City of Boston to join us in requesting this from MassDOT and the MBTA. 19.4

The proponent has proposed to operate and maintain shuttle buses looping through the site, connecting to local transit hubs (the Blue Line stops) and to locales of interest, such as North, South and Chelsea Station. While this is logical and appreciated, it is concerning as public transit should be a service provided and answerable to a public institution (even if the service is provided by a private contractor). It is unclear as to whether these shuttles would be fully available to the general public or for how long they would be maintained. Would they be answerable to equity measures overseen by the Federal Transit Administration (FTA)? For this reason we would advocate for an expansion of the MBTA bus network to include the development, as well as an improvement of the system in the immediate area in terms of reliability and headways, in order to provide a viable alternative to cars for those both within the development and the neighboring communities. 19.5

The addition of private shuttle buses into the traffic mix that already clogs the local road network of Routes 1A, 16, the Tunnels and local municipal streets will not be a good thing. It should be required that any shuttles, if they are implemented, be electric vehicles so that at a minimum they would not contribute to the degradation of local air quality and emission of Green House Gases (GHGs). Given that the connection to the existing rapid transit system is a selling point of the project, it makes little sense for the shuttle routes to simply take riders to the same endpoints (i.e., other MBTA stations easily accessible from the Blue and Silver Lines such as North, South and Chelsea Stations). As opposed to adding additional vehicular traffic perhaps these shuttles (or augmented MBTA bus routes) could go to locales more difficult to reach by public transit.

We applaud the Project Proponent's proposed investments in bicycle and pedestrian infrastructure. It should be clear that these are also amenities of the properties are as much selling points for the properties as they are public benefits. Realistically for those working in Boston and living on the site biking will not be a preferred option given the lack of a viable biking connection to Boston proper. For those that might be working at the site in the restaurants or in other service capacities, the potential for bike commuting is greater, as such the connections to the local neighborhoods is critical. In addition to the proposed connections to East Boston it is strongly recommended that the Proponent work with other municipalities and the State to ensure safe and efficient bicycle access to Revere and Chelsea as it is through those routes that many low income workers at the site are likely to be traversing. Currently bicycle access across Routes 1A, 16 and 145 is challenging to life-threatening. 19.6

<u>Housing</u>

The most contentious aspect of this project has been the issue of the affordability of the housing proposed. At this point the Project Proponent is following the minimum requirements laid out by the City's Inclusionary Development Policy (IDP) – 13% of the units will be accessible, as defined by the policy. Unfortunately, the definition of affordable is frequently out of the reach of many in the community.

Firstly, the Area Median Income (AMI) that is used to define affordability is horribly skewed. The area in question is an odd, gerrymander of a delineation that includes the income levels of communities as far removed as Seabrook, NH, while simultaneously excluding nearby, low income communities such as Lawrence to the north, Brockton to the south and Worcester to the west. According to the most recent American Community Survey data (ACS 2013-2017 five-year estimate of median household income), of the top 20 richest municipalities in Massachusetts 17 are in this region, while of the top 20 poorest municipalities in the Commonwealth, 0 are in this region. Until recently that last statistic was 3 – which included the nearby communities of Chelsea, Lynn and Everett. The new data reveal that median incomes have gone up in these communities (they have moved out of the top 20 list of poorest communities), however this is more likely a result of increasing displacement of poor populations and not a "lifting of all boats" as wages have generally remained stagnant.

The upshot of this poor definition of affordable is that 80% of AMI (a frequently used income limit) is persistently well above 80% of the local neighborhood AMI in rapidly gentrifying neighborhoods. For example, the AMI for 2016 in the general AMI-defined region was $98,100 when in Chelsea for the same time period AMI was $49,614, almost half the amount used to define affordability for the City. In the case of Boston, the local neighborhood of a project should be used as the neighborhoods of Boston exhibit some of the worst wealth disparity for a City in the country. Essentially our affordable housing policy is being used as a "social wringer" to expel the lowest income families in our communities. Given the scale of this project the BPDA should be working with DND and the Office of Housing Stability to re-evaluate the affordability guidelines specifically for this project. Assigning a larger percentage (may we suggest 25%) of the housing as affordable is a start – there should also be a re-evaluation of what affordable means *relative to the current population of East Boston that is confronting the housing and displacement crisis*.

Clearly lacking in this DPIR is an analysis of the impact of this development on the local real estate market, including the impacts on low income residents of this EJ community, as well as recommendations for mitigation of these impacts. It has been repeatedly stated in presentations that no one would be displaced by this project as no one lives on the site presently, which is clearly a disingenuous dodge of addressing what the sizeable impacts of this project on displacement in the surrounding neighborhoods will be. The Project Proponent should look at the effect of this project on the market pressures in the surrounding communities (and we would suggest that this study should include Revere and Chelsea, as well as East Boston). 19.7

Land Uses & Community Impacts

This project, similar to other large-scale developments such as the South Boston Waterfront District and Assembly Row in Somerville, presents the wholesale creation of an entire neighborhood anchored by transit infrastructure. What is clear in both of these other cases is that an exclusively mixed-use (mostly high-end) residential and commercial development more closely resembles a suburban mall than it does a vibrant, urban neighborhood. Aside from condos and places to eat, a neighborhood is also defined by municipal uses such as schools, police and fire stations, city offices and libraries, as well as places of worship, community-oriented organizations such as the YMCA, Community Social Centers, hospitals and clinics and other non-commercial entities. If the only public spaces are to be privately-owned, commercial spaces there is a risk of a feel of exclusivity.

The Project Proponent has mentioned the possibility of some spaces being available for community use (and obviously the privately-managed open space is the center piece of the proposed public benefit for the community) however the description in the DPIR is limited to:

- Civic spaces such as an outdoor performance space (when the public Open Space area is not retaining flood waters), an Innovation Center and public plazas near the T stops,
- Some historical element capturing the racing history of the site (either within elements of the open space or in a local museum – which one is not mentioned), 19.8
- Working with BPDA on integrating civic/community space.

Who would be responsible for the programming, where the money for this would come from, long term sustainability/viability of these uses are all questions still and we hope will be elaborated upon in far more detail in upcoming reports. We would recommend working with local institutions such as the East Boston CDC and NOAH in terms of identifying mechanisms for the long term sustainability of civic institutions occupying spaces in the community (the Proponent could look at long-lived and strong examples such as Meridian House, Atlantic Works, Zumix, etc.).

Finally, we would wish to express our concern about the increasing proliferation of "privately owned public space" (POPS) as the increasing privatization/commercialization of public space is a phenomenon that is experienced quite differently by different segments of the population. Until a greater equity and socio-economic accessibility analysis is performed on the effect of POPS in the urban environment, there is a risk that we are meeting our public space needs with a mechanism that may not be as answerable to the public as a publicly owned space would be. 19.9 The long term viability and performance of POPS is undefined. The Boston Common, for all the challenges of funding the maintenance of it, is still present and available equally to all 384 years after its establishment. Can any private entity make that kind of claim or promise?

<u>Sustainability and Green Building</u>

The proponent's "Response to Request for Additional Information" dated November 30th included a number of positive changes in this area and we would encourage them to go even further and for the City to require it. Energy efficiency measures and technologies to further the sustainability of our built infrastructure continues to advance rapidly. Given the long time frame of this project and the scale of its impacts, we should expect that the project will not only start with the state of the art of what is available in Green Buildings and sustainability, but will continually upgrade its commitments in this area during the construction period as technologies and best practices advance. The City should be requiring that this project remain at the forefront of sustainability as it develops rather than setting static goals that will be surpassed in during the build-out of the project. 19.10

Towards that end we would like to see the entire site consist of LEED Platinum buildings. More so than the actual ratings what we would truly prefer to see is a development that represents the values expressed in the City's Carbon Free Boston program, as well as the Net Zero goals for the region. Similarly, we expect that the Project Proponent will pursue its development in accordance with the goals of the City's Zero Waste program. For such a showcase development for the City of Boston this project should be the most sustainable, green and carbon-neutral neighborhood in the country.

In conclusion, we once again thank both BPDA staff and the Project Proponent 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. We look forward to seeing the responses to our requests for additional data and study. This project represents a challenging and complicated

project that will greatly impact not only East Boston but the greater Boston region for many generations to come. We are all clearly united in wanting the best project possible for all and we look forward to working with the Project Proponent, the State and the City in assuring this outcome. Thank you again for the opportunity to comment.

Sincerely,

John Walkey
Waterfront Initiative Coordinator
GreenRoots
[redacted]

Secretary Matthew A. Beaton
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114

Director Brian Golden
Boston Planning and Development Agency
1 City Hall Square, 9th Floor
Boston, MA 02201

Re: MyRWA Comments on Suffolk Downs Redevelopment DEIR/DPIR

January 14, 2019

Dear Secretary Beaton and Director Golden:

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. The Boston Society of Landscape Architects was founded in 1913 as the first chapter of the American Society of Landscape Architects. Today BSLA connects nearly 600 landscape architects across Massachusetts and Maine, as it serves to advance the profession of landscape architecture and promote the creation of extraordinary environments in cities and towns from the Berkshires to Bar Harbor to Boston.

MyRWA and BSLA partner with multiple communities through our Mystic Greenways Initiative and Resilient Mystic Collaborative to restore and enhance riverfront parks and paths while helping watershed communities prepare for increased flooding, drought and heat. The Suffolk Downs redevelopment has an outstanding opportunity to both support and benefit from these regional efforts.

Please note that we were able to incorporate few additional comments for the modified DEIR, except to say that we strongly support expanding the Sales Creek buffer back to the customary 100 feet from 25 feet. Sales Creek is part of the designated Rumney Marshes Area of Critical Environmental Concern (ACEC) due to its connection to Belle Isle Marsh; a 25-foot buffer minimizes the ability to restore its ecological function.

Overall Analysis
Regulators required a very high standard of analysis of projected 1% stormwater and coastal flooding in 2070. The analysis goes significantly further than what we have seen in past developments and uses the best available scientific data and models. It led to some important insights that point to more cost-effective opportunities for flood management. We hope that public

agencies are able to assist smaller developments with access to this quality of work. We also thank HYM for meeting with us twice and value the project improvements we saw over the course of 2018.

As the expected project buildout spans 20 years during a time of rapid changes in climate science and transportation technologies we ask that the permit require periodic updates in critical data and assumptions (e.g., rate of sea level rise, temperature increases, parking needs) no less frequently than every five years, or when there is a significant change in the proposal. Our specific comments follow by chapter, with recommendations in italics.

Urban Design

Given the scale of this development – larger than Tufts' University campus – urban design decisions will play large roles within this development and for East Boston and Revere. A robust landscape and building stock that provides environmental and quality of life benefits is hugely important. We commend the developer for enhancing Sales Creek and Horseshoe Pond, creating green streets ("green fingers") along portions of the street grid, increasing native plantings and control of invasive species, reusing runoff for landscape irrigation, and redirecting stormwater discharge away from Sales Creek and Belle Isle Marsh. We have several key recommendations that we believe will improve the natural and built environment for residents and neighbors:

- **Connections to Belle Isle Marsh**: We understand that the MBTA Blue Line lies in between the project site and Belle Isle Marsh, limiting opportunities for both pedestrian connections and opportunities for the marsh to migrate inland. *We recommend providing clear signage and wayfinding through the Suffolk Downs and Beachmont Blue Line stations to link proposed pedestrian pathways with those in the marsh.* 20.1

- **Design Excellence***: We suggest that the developer recruit and select an array of architectural firms through a competitive RFP process* to ensure that the development doesn't feel generic and monotonous but rather provides visual interest and cutting-edge designs that set a new standard for the region. 20.2

- **Supporting Local Nonprofits**: we appreciate the commitment to providing 10% of the retail space to local companies at an affordable rate. We think more could be done to bring the community and local culture into the development. This could *include free and/or discounted spaces for local nonprofits and community groups in the proposed community spaces*. A great example of this is the Society of Arts and Crafts located in the community space at 100 Pier 4, South Boston as part of the Chapter 91 requirement. 20.3

Sustainability/Green Building

By pursuing a model of patient, neighborhood-level development, Suffolk Downs has the opportunity to set a new standard for cost-effective, sustainable, carbon-neutral, climate-prepared development. LEED certification is one way to work towards this goal. We are pleased to see plans to pursue LEED certification and that there will be 20% green roofs (as stated in the modified DEIR). We would recommend that the developer pursue a higher standard of LEED certification than 5% LEED Platinum Buildings, a minimum of 75% LEED Gold Buildings, and a maximum of 20% LEED Silver Buildings.

Rather than suggest a ratio of LEED ratings, this development should seek to be carbon neutral, in line with Boston's 2050 goal. As certification is pursued for each building, we believe there should be points for Renewable Energy Production (Energy and Atmosphere) and Protect or Restore Habitat (Sustainable Sites) as these demonstrate an investment in natural systems. 20.4

Wetlands and Waterways

We commend the proponents for preserving and improving on-site wetland resource areas including the daylighting of Sales Creek, increasing native plantings and control of invasive species, removing impervious area in the Riverfront area and restoring disturbed or degraded areas closest to Bordering Vegetated Wetlands ("BVW") and Bank. We understand that a 50-foot setback from wetlands associated with Sales Creek in combination with a reduction in development in areas subject to the 1% annual flood would render this project not financially feasible.

However, given the ecological significance to the Sales Creek area, we ask for the customary 100-foot buffer zone to be maintained for Sales Creek to help protect Belle Isle Marsh. Both Sales Creek and Belle Isle Marsh, are part of the Rumney Marshes ACEC that has been characterized by the U.S. Fish and Wildlife Service as "one of the most biologically significant estuaries in Massachusetts north of Boston." The area includes approximately 1,000 acres of highly productive saltmarsh, tidal flats, and shallow subtidal channels. 20.5

Transportation

Suffolk Downs is also in an excellent position to exemplify 21st century, multi-modal transportation that reduces greenhouse gas emissions and provides safe and reliable transportation. We are pleased to see proposed walking and biking connections to Belle Isle Marsh and Constitution Beach as well as the 20-foot (where possible) community path between Constitution Beach and Revere Beach. We commend the proponent on pushing back on Revere's higher minimum parking requirements and *support the updated plan to incorporate a "shared parking concept; and inclusion of a requirement to track parking demand data which can allow the Proponent to reduce the construction of additional parking spaces as the development is constructed."*

We believe that several additional measures are needed to mitigate traffic impacts and incentivize mode shifting beyond single-occupancy vehicle use.

- **Ongoing Transportation Mitigation and Management**: as there are many assumptions that will change as the development is built over 20 years (e.g., trip generation predictions, impact on the MBTA Blue Line), *we recommend the creation of a multi-jurisdictional working group to decide the most impactful transportation mitigation projects*. This could be similar to the Lower Mystic Regional Working Group, but also include a budget for capital and operational needs that funds sustainable transportation (transit, walking and biking and car share/electric vehicles initiatives). This will allow for implementation, not just planning efforts. Development of a Transportation Management Agency that coordinates with surrounding North Shore TMA's would be prudent. 20.6

- **Active Transportation:** We applaud proposals to connect the site across Bennington Street to both Belle Isle Marsh and Constitution Beach and encourage the proponent to give similar consideration to Chelsea Creek. The proponent's plans to reconstruct Route 1A as a "Super Street" are counter to encouraging access to Chelsea Creek. *We encourage the proponent to* 20.7

consider ways that the redesign of Route 1A can include safe and accessible crossings for pedestrians and cyclists to access potential future open space along Chelsea. 20.7 cont.

- **Shuttles:** We understand that the nature of the shuttle system will change over time. Successful elements of the shuttle fleet include being: sustainable, reliable and affordable; comparable in price to the MBTA; electric/clean fuel; and connected to surrounding neighborhoods and other transit modes at off-peak hours. *As the proponent rolls this out over the years, we would ask that the shuttle proposal be thoroughly vetted with the community.* 20.8

- **Parking:** We understand that the City of Revere is requiring parking ratios for office/lab spaces at twice the ratio the City of Boston proposed for this site. The proponent suggests that meeting Boston's lower parking ratios would be "difficult", but provides no explanation for why this would be difficult in a TOD site uniquely served by existing transit. *We would ask that this office/lab space ratio be revisited to see if there is a way to cut down on parking so as to not incentive more single-occupancy vehicle use.* 20.9

  Included in the proposed 15,250 parking spaces are 557 on-street parking spaces which the proponent identifies as free time-limited spaces. *We would ask that the developer explore the idea of metering these spaces to provide local revenue and encourage greater parking turnover rates.*

Climate Change Resilience

It was clear from the DEIR that state regulators required a very high standard of analysis. We were glad to see that the DEIR uses best available numbers and flood models and that HYM is making this analysis available to Revere and DCR for use in climate planning in the Sales Creek watershed. *We encourage HYM to keep up with the latest climate projections even after permitting has been secured.* 20.10 We were glad to see that the analysis led to the creation of on-site stormwater retention and the proposal to re-grade the property to drain into larger Chelsea Creek instead of smaller Sales Creek to lessen the risk of flooding nearby neighborhoods.

One strategy cited for on-site storage is the use of underground parking garages. Please note that when this strategy is used, the water storage area is typically separate from the parking area, as shown in the depiction of a stormwater storage tank built under a parking garage in downtown Rotterdam (see left).

We note that the DEIR appeared to contain some confusion between stormwater versus coastal flooding (for example, Appendix B, Page 7, E-1: "A large portion of the site will be designated as…sea level rise storage"). **Bordering lands subject to stormwater flooding** require compensatory flood storage on site. Stormwater flooding, even when extreme, is of finite volume with opportunities to store and release it slowly. Strategies to prevent stormwater flooding on one property—especially through elevating a site—may well increase flooding elsewhere. The proposal to send stormwater 20.11

to Chelsea Creek, not Sales Creek is a good way to manage stormwater with a neutral to positive impact on neighbors.

Conversely, **lands subject to coastal flowage** (e.g., water coming in through Belle Isle Marsh) don't require on-site flood storage because coastal saltwater flooding is essentially of infinite volume and is not storable. Preventing coastal flooding requires barriers (including tide gates) of effective height to keep out ocean water. This project should have no inherent impact on coastal flooding of its neighbors. 20.11 cont.

We strongly support the recommendation that HYM contribute to a larger regional coastal flood barrier, rather than be required to complete a barrier that only protects its own site. We understand that this is beyond HYM's discretion, and hope that the cities of Boston, Revere and Chelsea, the MBTA, Mass CZM and local stakeholders such as the Friends of Belle Isle Marsh form a taskforce to design and implement a regional flood barrier that would also provide ecological and social benefits.

Also, although the project is unlikely to affect the adjacent Irving Oil Terminal on Chelsea Creek, we are concerned that a severe coastal storm could damage the fuel tanks and spill oil into Chelsea Creek and the Suffolk Downs site. *HYM and its public and private neighbors have a strong interest in ensuring that the Irving Oil Terminal is prepared for the more extreme coastal storms predicted by climate change.* 20.12

The project lifespan is predicted to last fifty years from full build out, or 2085. If sea level rise projections are higher than the 2100 intermediate projections modeled, the site could experience high tides six feet higher by then. *Given the project site's susceptibility to coastal flooding, we urge proponents to elevate finished floor elevations to closer to 24 feet BCB through additional terracing between street level and their entrances.* 20.13

Two recent East Boston developments, Clippership Wharf and 181 Coleridge Ave (left to right, below), use effective variations on this to elevate first floor openings to this height. *Including extra-high first floor ceilings also provide opportunities to raise first floor elevations in the future.* Clippership Wharf also provides examples of multi-functional landscape architecture approaches that accommodate salt water inundation, while also providing new areas of public access and recreation to the harbor. 20.14

In addition, *shelter-in-place strategies, as proposed in the DEIR/DPIR require that residences be inhabitable for multiple days during hot and/or cold weather without access to power*. The Concord Highlands project in Cambridge, for example, is an affordable housing project that is designed maintain comfortable interior temperatures even without HVAC.

We are glad that project proponents met with experts in resilient architecture, including Ellen Watts of Architerra. Ellen has been promoting the idea of creating a branded standard of excellence in building, branding and marketing exemplary energy efficient/resilient buildings, as Hamburg, Germany has done (see www.rexboston.com). *HYM could and should similarly issue RFPs with energy efficiency, design and resiliency standards for each building to take advantage of Boston-area design excellence in creating a highly-desirable, immediately exemplary neighborhood.* 20.15

Additional general comments:

- The NECASC precipitation data represent averages; Suffolk Downs is likely to experience the most damage from intense cloudbursts such as Hurricane Michael and Harvey brought North Carolina and Texas. *HYM's stormwater strategy needs to include a "fail quickly-fail cheaply" strategy for intense rainfall events that exceed design parameters.* 20.16
- Summer heat in Greater Boston is already increasing to levels beyond historical norms. Climate Ready Boston projections indicate that Boston could experience Washington, DC's climate by mid-century and Birmingham, AL's climate by late century. Landscape designs should include more water and shade elements than historic New England norms. 20.17
- We were glad to see project proponents go beyond regulatory requirements in considering heat effects (that said, local regulations regarding heat mitigation strategies are quite limited). Some recommendations: 20.18
    - *Include not only light pavement, but also white roofs;*
    - *Incorporate interactive water elements such as the Greenway's ring fountain and mist tents to help children and adults cool off;*
    - *Make sure bike/pedestrian paths are shaded so they continue to be used during heat waves.*

Environmental Protection

We commend the proponent for the thorough analysis of environmental impact on wind, shadow, air quality, and the impacts during construction. The Air Quality analysis focuses, as required, on CO and VOCs. However, traffic also generates heavy metal pollution that degrades water quality. Since the development will generate a significant increase in traffic, we feel that the impact should be assessed. *Since heavy metals are transported to water bodies via stormwater, we ask that the stormwater management plan address heavy metals.* 20.19

Infrastructure

We commend the proponent for a stormwater management plan that will significantly improve the overall quality of stormwater run-off. We appreciate the reuse of runoff for landscape irrigation, as well as re-grading the site to direct more of the stormwater discharge into Chelsea Creek instead of smaller Sales Creek. The stormwater management plan utilizes retention rather than infiltration because of the existing soil conditions. The plan appears to have adequate stormwater storage

capacity to address current 100-year storms; as precipitation increases in intensity, additional strategies will be needed.

In closing, we are encouraged to see a development revitalizes an underused site and connects communities across municipal borders and between Chelsea Creek and Boston Harbor. We look forward to a continued partnership with HYM and its host communities to create a thriving, climate-prepared, low-carbon new neighborhood. Please do not hesitate to contact us with questions or comments at (781) 316-3438 or julie.wormser@mysticriver.org.

Sincerely,

Patrick Herron
Executive Director, Mystic River Watershed Association

Gretchen Rabinkin, AIA, Affiliate ASLA
Executive Director, Boston Society of Landscape Architects

Appendix C: Public Comments

December 12, 2018

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

Dear Mr. Czerwienski:

I am writing to express my strong support for the HYM / Suffolk Downs Redevelopment project. The proposed project will redevelop the former Suffolk Downs racetrack into a new vibrant community. This new community will include new housing (including affordable housing) as well as commercial development & a beautiful 40 acre public park network. The proposed housing will include apartments, townhouses, senior housing and condos.

HYM has done extensive outreach in East Boston & the process has been very transparent.

Overall, I support the redevelopment of the Suffolk Downs site and look forward to it becoming part of East Boston.

Thank you for your consideration.

Sincerely Yours,

Jim Kearney

President-Elect, East Boston Chamber of Commerce

December 12, 2018

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

Dear Mr. Czerwienski:

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HYM has done extensive outreach in East Boston & the process has been very transparent.

Overall, I support the redevelopment of the Suffolk Downs site and look forward to it becoming part of East Boston.

Thank you for your consideration.

Sincerely Yours,

Pat Todisco

December 15, 2018

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

Dear Mr. Czerwienski:

I am writing to express my strong support for the HYM / Suffolk Downs Redevelopment project. The proposed project will redevelop the former Suffolk Downs racetrack into a new vibrant community. This new community will include new housing (including affordable housing) as well as commercial development & a beautiful 40 acre public park network. The proposed housing will include apartments, townhouses, senior housing and condos.

HYM has done extensive outreach in East Boston & the process has been very transparent.

Overall, I support the redevelopment of the Suffolk Downs site and look forward to it becoming part of East Boston.

Thank you for your consideration.

Sincerely Yours,

Derek J. Brodin & Family
69 Waldemar Avenue
East Boston, MA 02128

Tim Czerwienski <tim.czerwienski@boston.gov>

IAG Member Comment

Ernani DeAraujo <[redacted]> Thu, Dec 13, 2018 at 2:54 PM
To: "Tim Czerwienski (tim.czerwienski@boston.gov)" <tim.czerwienski@boston.gov>

Dear Tim:

I write this note in continued support of the proposal by HYM Investments for the development of the former Suffolk Downs site. A few additional notes to add to my previous comments around mitigation:

Housing: HYM has committed to build thousands of new homes to meet the desperate housing shortage in greater Boston. They should continue to work toward developing lower cost and affordable options beyond the 13% dedicated affordable. In particular, they should consider a range of lower cost, lower amenity options such as micro units, rooming houses, and other alternative/flexible living arrangements to provide lower rent market options for a broader range of users. Moreover, they should commit to increase the amount of handicap accessible units throughout their development. Individuals with physical and mental disabilities have very few options for adaptable living spaces and HYM could help address this issue with their affordable and market units.

Flexibility/Community Input: Whatever initial plans are approved, there should be flexibility in the 20 year expected development time frame to revisit aspects of the plan for community input. The East Boston community went through a substantial planning effort for our waterfront in the late 1990s and by the time the economy permitted construction (over a decade later), certain aspects of the planning did not reflect the needs or preferences of the new community. I understand that each phase of the development will have its own detailed process and this will enable timely input to ensure that future changes in living patterns, transportation, public health, etc. can be reflected as this private development grows.

Thank you for your consideration,

Ernani Jose DeAraujo

68B Horace Street

John Vitagliano
Principal
Member-ITE

Seagull Consulting
19 Seymour Street
Winthrop, MA 02152
(617) 846-1105
seagullconsult@msn.com

December 13, 2018

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

Dear Mr. Czerwienski:

I strongly support the HYM/Suffolk Downs Redevelopment Project which 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 development and a sublime forty-acre public park network.

HYM has been involved in an extensive and transparent project outreach program in East Boston, touching base with every conceivable neighborhood and social organization.

These new homes, businesses and parks would partially replace the thousands of homes, businesses and parks East Boston has lost to many huge 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 Project 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 fully 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 extreme temperatures. 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 strategically 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.

The HYM/ Suffolk Downs Project would also benefit East Boston because it would prevent, permanently, the development of Suffolk Downs' 161 acres for purposes detrimental to the best interests of East Boston.

Thank You,

John Vitagliano

Former Boston Transportation Department Commissioner and East Boston Resident

Tim Czerwienski <tim.czerwienski@boston.gov>

Suffolk Downs Project

Diane DiGiacomo [redacted] Fri, Dec 14, 2018 at 3:55 PM
To: tim.czerwienski@boston.gov, pilawma@aol.com

Tim,

I have some concerns that I would like to share with you. I attended the meeting the other night and saw the book that showed what the condos would look like along Waldemar Ave.

I have been a Waldemar Ave resident for 57 years. I was born and raised at this property.

Many meetings ago I was under the understanding that the townhouses would be built across from my property at 124. Now I see that there are mini Harbor Tower Buildings that have been proposed along this street. I do not want these tall buildings in the front of my property. We have mostly all low income housing up the street and I don't think its fair that we should have the low income units in front of our property. We will be surrounded by these units and our property value will DECREASE.

Also, I feel that there should be Political Representatives at these meetings to address the low income housing issue. Tom is a developer and purchased the property. I do not think that people understand that this project is a private entity.

My neighbors and I are very concerned about this project as we will be directly impacted by this nightmare.

Why hasn't the city conducted its own EPA study? I realize that the Developers conducted their own but as a tax payer I would like to see an independent study. I am a two time cancer survivor and Waldemar Ave residents have, had, and died of cancer.

We will be directly impacted with noise, air pollution, traffic etc. I feel that Waldemar Ave residents should meet with Tom separately without the public meetings. WE are directly effected more than the rest of the community who do not live on this street.

I have several questions that must be addressed to myself and my neighbors. I hope the city is addressing our concerns in a proper manner. I have friends who fought the Cowper Ave project and that developers wanted to build 40 condo units and because of the persistent neighbor that are now only going to develop eight.

I understand that there has been over 200 meetings that were held in the city but I feel that there is a huge part of the community that is unaware and under represented and do not have a clue about this project.

Thanks,

Diane DiGiacomo
124 Waldemar Ave, East Boston
[redacted]

Tim Czerwienski <tim.czerwienski@boston.gov>

Notes to include for 12/17/18 ** RE: Suffolk Downs & HYI Investment group

Delprato, Therese F [redacted] Mon, Dec 17, 2018 at 4:23 PM
To: Tim Czerwienski <tim.czerwienski@boston.gov>

Attn: Mr. Tim Czerwienski tim.czerwienski@boston.gov

&

Mr. Tom O'Brien HYI Investment group

Please add these notes for review & comment re the project Suffolk Downs & HYI Investment group

1) Industrial Hygienist dedicated to the project for the existing building, Suffolk downs main Unit from 1920 **
2) Concern of lead pain & dust to the Waldemar ave., direct abutters
3) Opportunity to those families directly affected, the "Orient Heights neighborhood" for jobs during construction &
4) As competition occurs, Management & supervision of the new complex
5) Mitigation to/for the direct abutters of the project as it affects Waldemar ave Homes*
6) Cleaning of exterior walls of homes/paint/monetary adjustment/tax reduction

These are all items I would like to see included in the reflection of Project of phase one.

If they need to be reviewed at a different time/phase of the project/please note what

Phase they will be reviewed in.

Thank you for time to address these concerns.

Best Regards,

Therese DelPrato

61 Waldemar Ave

East Boston, MA 02128

[redacted]

Therese DelPrato Lead RMA, EMT, EMT Supervisor

Boston University Student Health Services 881 Commonwealth Avenue, *WEST* *Boston, MA 02215*

Te[redacted]

Tim Czerwienski <tim.czerwienski@boston.gov>

comments on Suffolk Downs HYM project

Eleanor G. Mazzarella Catino [redacted] Tue, Dec 18, 2018 at 7:36 PM
To: Tim Czerwienski <tim.czerwienski@boston.gov>
Cc: [redacted]

Hello Tim,

Thank you for this opportunity to share some of my responses to the Suffolk Downs project. The time spent sitting at meetings and discussions and reading through the documents has left me with some thoughts about this project - which will greatly impact the city of East Boston and the neighborhoods around the project for years to come. I appreciate the opportunity to comment as well as the many presentations and conversations that HYM has encouraged and supported.

My first major concern is about the height of many of the taller buildings and the density of the project overall. As we have been told, the Suffolk Downs project is one (?) of the largest development projects in the history of the city and the immensity of the project has become apparent. Although it appears that HYM is working to think carefully about this and balance many competing voices, I feel it would be important to consider reducing the height of buildings as they are immense in comparison to the neighborhoods around them. I understand that this is asking a lot of this development but I do think it is a valid and pressing concern.

Connected to the density of the project is the issue of traffic. Again, HYM has been helpful in sharing their many studies and ideas for mitigation around the issue of traffic. It is encouraging to see that they actually seem to be taking the issue seriously. I hope that they continue to pursue issues related to traffic. I would also ask that we consider the impact of more traffic at the intersection of Waldemar and Bennington Street. People are also concerned about the traffic at the rotary intersection of Saratoga and Boardman Street.

I have been impressed by HYM's commitment to open space and their thoughtful incorporation of the ways in which people are able to move through the space. I would like to continue to encourage them to continue to think about the open space and areas that would be useful to East Boston as a whole, such as playgrounds and playing fields.

I am concerned about the impact of such a large project on the local resources, especially emergency services and the schools. Although we have been told that there would be minimal impact on the schools, I would like to see more specific facts and get a sense of how they came up with those numbers. Even with small numbers, 20-25 children is a whole classroom in a school.

And, in terms of mitigation, I think those conversations need to continue happening. Much of the proposed mitigation is what is required by either the city or state, if I understand correctly. I agree with others who have talked about establishing a fund around this project that provides directly to the community of East Boston, through scholarships, local grants, public space, etc. The impact on the community of East Boston is quite different than the impact on Boston as a whole. The mitigation needs to address this issue.

Although I sometimes get the sense that there are those who feel as if the issues of height, density and traffic have been discussed sufficiently, I disagree. These are central issues to the project and set the tone for the entire project. Those issues are foundational and if we do not address the foundations first, we all know that things will tumble. So continuing to raise theses issues is a persistent optimism that this project will continue to develop in ways that will make sense to all of those who work to advocate for the community of East Boston.

Thank you for your time.

Sincerely,

Eleanor Mazzarella Catino

December 19, 2018

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

Dear Mr. Czerwienski,

I am writing this letter of support for the HYM/Suffolk Downs Redevelopment project. Let me begin by applauding HYM's efforts to inform and include our community in the planning and design process. HYM has been extremely responsive to the recommendations and feedback of concerned residents. There is no doubt that the development of Suffolk Downs is the largest development project to impact our community in my lifetime. The sheer size and scope of this project will have a profound impact on both the infrastructure of East Boston and its residents.

The new community being developed will provide needed condos, apartments, townhouses and senior housing, commercial space, and additional green space to East Boston and bordering communities. I support the development of Suffolk Downs and HYM in their continuing effort to address concerns of density, height, and the transportation impact of this project. The continuing exchange between HYM and the impacted communities is the best guarantee of a successful development.

Sincerely yours,

Debra Cave

Comment: Created Date	First Name	Last Name	Organization	Opinion	Comments
12/15/2018	juliana	leal-nunez		Oppose	My husband and I are in our mid thirties and want to start a family in the next couple of years. We currently rent a 2 bedroom apartment on Chelsea St in East Boston that was recently renovated. We are the only people of color and the only people actually invested in East Boston as a neighborhood in the entire building. He works a union job for the state, and I'm a college graduate with 10yrs dedicated to my corporate career, working full time. We spend HALF OF OUR INCOME ON RENT. East Boston and Revere have the character, charm, and appeal they have today because of blue collar, hard working, often minority and immigrant population who invested into their neighborhoods. And these very same people are being priced out of their own homes, or left to live in dilapidated, unfit, forgotten rental units (until their buildings are sold and they're forced out). This is not only sad, it's revolting - because it's in the hands of our representatives, our leaders, to say NO to building without a conscience, NO to leaving real people, real constituents out of sight and out of mind, and to say NO to turning East Boston and Revere into another homogeneous, gentrified, no-character-having couple of neighborhoods that displace their own communities without a second thought. Greed does not build, it destroys. We ask that you really put your power where your mouth is. Seize this opportunity to provide a future for your constituents - the people who have dedicated their lives to breathing life and character into these neighborhoods. Don't turn us into more statistics. Take a stance and do what's right. Fight and win for affordable housing, for the future of the people of
					East Boston and Revere.
12/14/2018	Kate	Cowie-Haskell	Boston resident	Oppose	Development of this neighborhood needs to happen with MORE AFFORDABLE HOUSING UNITS at an income level that is actually affordable. I encourage you to consult with City Life Vida Urbana about making this neighborhood accessible and healthy for all.

Comment: Created Date	First Name	Last Name	Organization	Opinion	Comments
12/13/2018	richard	patoski	1949	Oppose	Opposed until there is a requirement that at least 50% of the square footage built be housing and that there is more (at least 20% of the total number of housing units built) long term deed restricted affordable workforce rental housing which can be achieved by allowing the the developer to build higher residential buildings with limited parking beyond spaces for share driving vehicle such as zip cars, that renters would be charged extra for on a demand-supply cost basis (no free parking for either residential or commercial space tenants/owners. Require that the developer be specifically required to build some of the affordable housing as deed restricted Limited Equity CO-OP housing that will stay affordable forever, on the model of the Garment Workers limited Equity CO-OP Housing in NYC (not the brick bottom artist co-op in Sommerville that was structure so poorly that co op member were able to cash out when the market value of their units went up) Probably the most stable affordable housing in Manhattan today.

Comment: Created Date	First Name	Last Name	Organization	Opinion	Comments
12/4/2018	Elena	Bertkau		Neutral	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 Squre 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 promote incentives for drivers to take public transportation into the city. As this development moves forward the city of Boston to install
11/3/2018	James	Linthwaite		Oppose	More than 300 units are either proposed or under construction just between Addison and Swift Streets in East Boston. That number does not take into account the hundreds of units proposed at Suffolk Downs. The roads can?t handle the current traffic. And even if, as the developers and their attorneys falsely assert, residents won?t have cars the MBTA can?t handle rush hour now. There has been, and it appears there won?t be, any investment in infrastructure. As a result the community is grid locked almost 24/7 with no concern being given to the quality of life of existing and new residents. Large developments such as this are completely out of scale and inappropriate given the current state of roads and public transportation.

Comment: Created Date	First Name	Last Name	Organization	Opinion	Comments
10/23/2018	James	Linthwaite		Oppose	This project is far too large for the parcel and the surrounding area. In addition to this project there are over 330 units proposed for the area between Addison Street and Swift Street. This scale of development such a small area is entirely too dense. The existing infrastructure cannot handle the current vehicle traffic. The MBTA Blue Line is unable to currently cope with morning and afternoon rush hour. While I understand that housing is needed this benefits no one other than the developers and no infrastructure changes or enhancements have been put forward. Thank you.
10/5/2018	Feruza	Acevedo		Support	After attending numerous presentations for this project and recently seeing a scaled model of the project being proposed, I am in full support of the project. We are in the process of trying to build a home for our family on Waldemar Avenue. Despite being in close proximity, we believe this development would be an incredible opportunity for the neighborhood and would create much needed housing; as well as it would create new restaurants and retail options within walking distance. Our current retail options in East Boston leaves much to be desired; I hope this development when finished will change this outlook. The renderings of the parks, bike trails, and outdoor space as well as the buildings themselves look incredible.