



SUFFOLK DOWNS REDEVELOPMENT

Additional Information Document

SEPTEMBER 16, 2019



PREPARED BY



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



September 16, 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 Additional Information Document ("AID") to the Boston Planning & Development Agency ("BPDA") for the construction of the Suffolk Downs Redevelopment Project (the "Project") located at 525 McClellan Highway in East Boston (the "Project Site"). This AID is being submitted pursuant to Article 80 of the Boston Zoning Code (the "Code") in response to the BPDA's Request for Additional Information ("RAI") issued on August 22, 2019 with respect to the Project.

The 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 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.

The Code does not require a public comment period for additional information documents, but the Proponent has arranged with BPDA staff for the publication of public notice regarding the submission of the AID, and for a 30-day public comment period, to allow for comments on the AID, with all comments due to the BPDA by October 16th. Requests for additional copies of the AID 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 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**
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Additional 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 Additional Information Document ("AID") to the Boston Planning and Development Agency ("BPDA"), in response to the BPDA's Request for Additional Information ("RAI") dated August 22, 2019 on the Draft Suffolk Downs PDA Master Plan document filed on February 12, 2019 and the Supplemental Information document ("SID") filed on May 1, 2019. The "Master Plan Project", or "Project," is a new transit-oriented mixed-use community 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 AID includes the requests described in the BPDA's RAI (a copy of which is appended to this document), along with a response to each information request.

1.1 Summary of BPDA Review Process

The Proponent filed a Project Notification Form ("PNF") with the BPDA on November 30, 2017, which kicked off the formal BPDA review and community process. After the initial phase of review and community process was completed, the BPDA issued a Scoping Determination to the Proponent on February 21, 2018. The scoping determination sought further analyses and studies by the Proponent, in addition to responses to comment letters. The Proponent subsequently responded with a Draft Project Impact Report ("DPIR"), which was filed with the BPDA on October 1, 2018. The filing of the DPIR kicked off an additional review and community process.

On February 1, 2019, the Proponent submitted a proposed PDA Master Plan and five PDA Development Plans for development thereunder: A Phase 1 Development Plan, a Phase 2 Development Plan, a Phase 3 Development Plan, a Phase 4 Development Plan and a Phase 5 Development Plan (collectively, including the Master Plan, the "PDA Plans") respecting the Project. The PDA Plans were also translated into Spanish and made available for Spanish speaking residents.

The BPDA determined that further analysis was needed and required the Proponent to file a Supplemental Information Document ("SID") in a request dated February 12, 2019, and on May 1, 2019 the Proponent filed a SID in response to the BPDA's request. Notices of the filing of the PDA Plans and SID were published in the Boston Herald on February 7, 2019 and May 13, 2019, respectively. The public comment period respecting these materials ended on May 31, 2019. The RAI was issued following the end of the public comment period on the prior Article 80 filings. In addition to the above, the BPDA has hosted numerous publicly advertised

community meetings, including meetings regarding the PDA Plans and SID on February 26, 2019, March 7, 2019 (meeting in Spanish language) and May 21, 2019. In addition, Impact Advisory Group meetings regarding the filings were held on April 10, 2019 and April 30, 2019.

The Proponent is seeking the issuance of a Preliminary Adequacy Determination ("PAD") by the BPDA pursuant to Section 80B-5.4(c) of the Boston Code, and approval of the PDA Plans pursuant to Section 3-1A, Sections 53-44 through 53-49, and Article 80C of the Boston Code, and authorization for the Director of the BPDA to petition the Boston Zoning Commission to approve the PDA Plans. The BPDA in the PAD may determine all components of the AID are sufficient to meet the requirements of the RAI and may waive further review pursuant to Section 80B-5.4(c)(iv), if, after reviewing public comments, the BPDA finds that the AID and other Article 80 filings (including the PNF, DPIR, SID and PDA Plans) together adequately describe the Project's impacts.

1.2 Master Plan Project Refinements Since Previous Filings

In response to input and comments from various stakeholders, the following changes to the Project and PDA Plans have been made since the filing of previous documents:

1. Clarified and made additional commitments for public ownership and perpetual easements rights for the Suffolk Downs open space system including approximately 2.5 acres of park land to be owned by the City of Boston and an additional approximately 3 acres of park land on which the City of Boston is to hold perpetual easement rights. In addition, the City of Boston will hold shared programming rights on key portions of the open space system;
2. Proposed changes in the IDP (affordable housing) proposal to allow greater flexibility for the City of Boston for the on-site 13% inclusionary housing, including flexibility that will allow for a greater number of family-friendly affordable housing units (e.g., three-bedroom units), and flexibility regarding having on-site rental units at an average of 70% of Area Median Income ("AMI"), instead of all units at 70% of AMI, as discussed below;
3. Commitment to funding a new East Boston Neighborhood Housing Stabilization Fund and to work with the City of Boston to direct portions of future Housing Exaction Payments (Linkage Funds) to this new East Boston Neighborhood Stabilization Fund, to help address ongoing displacement pressures in and around East Boston. The amount to be funded is being discussed with the City and elected officials.
4. Committed to design and construct an extension of the East Boston Greenway from Constitution Beach to Walley Street/Bennington Street; a two-way cycle track along Walley Street from Suffolk Downs to the new East Boston Greenway extension; and a new safe pedestrian/cycle crossing signal at Bennington Street;

5. Further reduced height for two residential buildings very close to the Orient Heights neighborhood which was offset by a minor increase in height for residential buildings near Route 1A (no change in square footage resulted from this minor height reallocation);
6. Agreed to dimensional requirements and urban design parameters to improve urban design and the public realm and provide additional protections for the proposed open space system and surrounding neighborhoods, including requirements for right-of-way layout and dimensions, maximum building coverage, maximum building heights, maximum podium heights, minimum distance between building towers, building setbacks, maximum horizontal building wall length, active ground floor uses, and parking, service and loading dock entrances;
7. Made minor site plan changes to Phase 5 development layout in response to a reduced Route 1A corridor design (elimination of deferred lefts);
8. Reduced the number of onsite parking spaces proposed in Boston by 456 spaces;
9. Identified right-of-way easements to be granted to the City of Boston with respect to specified roadway rights-of-way;
10. Made changes in the proposed traffic mitigation for the Route 1A Corridor based on extensive discussions with MassDOT, the City of Boston and the City of Revere, and agreed to utilize cost savings from the modified Route 1A design to provide funding for upgrades to the public transit system serving East Boston and Revere, such that there will be no reduction in the cost of transportation mitigation improvements being provided by the Project; and.
11. Committed to off-site resiliency improvements including the installation of an additional tide gate and funding a 50 percent contribution to the upgrading of the Bennington Street pump station, up to \$2.625 million.

1.3 PDA Master Plan Document Structure

Comment: *The document should avoid referencing previous filings or documents required by other agencies and should include all reference material in the appendix of the PDA Master Plan.*

Response: The Proponent has included as Attachments [1-6] to this AID updated versions of the PDA Plans in redline format to highlight changes made in response to comments and feedback from stakeholders, including elected officials, members of the public, and representatives of governmental agencies. The revised PDA Plans have been modified to remove references to previous filings or documents not included in the PDA Plans themselves.

1.3.1 Proposed Development Framework

Comment: *To clearly communicate the planning objectives and character of the development, the Suffolk Downs PDA Master Plan must demonstrate a development*

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

Response: The PDA Plans have been revised and supplemented in response to this comment and further discussions with BPDA staff. The Proponent and BPDA staff have worked together to develop additional dimensional requirements and urban design parameters with variations on a street-by-street, phase-by-phase or building-by-building basis, and the Proponent has made new commitments respecting these matters, as discussed in the Sections below, as well as commitments respecting public easements in key rights-of-way. The Proponent has also made new commitments respecting open space areas, including commitments for public ownership and shared programming rights on key portions of the open space system, as discussed below in Section 1.7. A draft parcelization plan is provided in Figure 1.

In addition, based upon neighborhood input, the Proponent has further reduced height and square footage of two buildings in close proximity to the Orient Heights neighborhood and the proposed new Orient Heights Park, changes that have been offset with minor increases in height and square footage of buildings closer to Route 1A. These minor changes do not increase the overall square footage of the Project, i.e., they result in the Project maintaining the same amount of square footage in the aggregate.

1.3.2 Public Rights-of-Way

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

Response: The PDA Plans have been supplemented to include a plan, as Exhibit [C-1] to the Master Plan PDA, showing the proposed locations and intended dimensions for proposed on-site rights-of-way. Each right-of-way has been designated using nomenclature from the Boston Complete Streets guidelines. As set forth in the updated PDA Plans and specified in Section 5.c.ii of the updated Master Plan PDA the Proponent has committed that right-of-way easements will be granted to the City of Boston after the completion of the construction of each applicable right-of-way and the buildings on the adjacent development parcels. The public easements will be granted in the rights-of-way that will provide utilities and emergency access for the

overall site. Figures 2a-2g in this AID illustrate a sample of the dimensions of several key rights-of-way within the Project Site.

1.3.3 Mitigation for Impacts

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

Response: The updated PDA Plans include a schedule of public benefits and mitigation measures for the Project, which has been updated for the additional commitments made by the Proponent, and which includes detailed information regarding how certain mitigation measures and public benefits are tied to phasing and triggers for implementation. See Exhibit J to the PDA Master Plan and Exhibit F to each of the PDA Development Plans. The information regarding specific mitigation and triggers and phasing has been updated since PDA Plans were submitted by the Proponent on February 1, 2019, with changes made in response to comments and feedback from stakeholders, including elected officials, members of the public, and representatives of the BPDA and other governmental agencies. The mitigation and public benefits have been developed and planned in a manner that is proportionate to the phased development program for the Project.

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

Response: Section 5.b of the PDA Master Plan and Section 4 of each PDA Development Plan have each been revised to include new dimensional requirements and urban design parameters, which were added in response to comments and feedback from BPDA staff and other stakeholders, including elected officials and members of the public. The dimensional requirements and urban design parameters

address right-of-way layout and dimensions, maximum building coverage, maximum building heights, maximum podium heights, minimum distance between towers, building setbacks, maximum horizontal building wall, requirements respecting active ground floor uses, and locations and widths of parking, service and loading dock entrances. These new design parameters and dimensional requirements are being established on a street-by-street or district-by-district basis. The dimensional requirements are shown graphically on plans to be incorporated in the PDA Master Plan and Development Plans.

The Proponent has made new commitments respecting open space areas, including commitments for public ownership and perpetual easement rights for key open space areas. Approximately 2.5 acres of open space is to be owned by the City of Boston and an additional approximately 3 acres of open space will be subject to perpetual easement rights. The City of Boston will also hold shared programming rights on key portions of the open space system. Detailed responses respecting the comment letter from the Boston Parks and Recreation Department ("BPRD") are set forth below in Section 1.7.

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

Response: As noted in the response above, Section 5.b of the revised PDA Master Plan and Section 4 of each PDA Development Plan include new dimensional requirements and urban design parameters, which address right-of-way layout and dimensions, maximum building coverage, maximum building heights, maximum podium heights, minimum distance between towers, building setbacks, maximum horizontal building wall, requirements respecting active ground floor uses, and locations and widths of parking, service and loading dock entrances.

1.4 Housing Affordability

Comment: *While a developer's requirements under the Inclusionary Development Policy ("IDP") on one-phase projects, whether small or large, are generally well understood (though still open to increases as part of the Article 80 review process), given the scale and character of the Proposed Project it is important that there is a commitment to additional affordability at this site. The following are areas where the BPDA and the Proponent have already agreed on some specific goals and outcomes, and the Proponent's response should outline their agreement with these goals as well*

as any additional and/or more specific efforts the Proponent will undertake to create additional affordability on-site or within East Boston.

1. The Proponent has agreed to provide the on-site rental units at an average of 70% of Area Median Income ("AMI"), instead of all units at 70% of AMI. The maximum AMI of any individual unit would be no more than 80% of AMI. This change from what is typical practice under the IDP is allowed in this area of the City and will assure that a broader range of incomes can be served and can access housing at Suffolk Downs.
2. Under the IDP, the focus has been on providing a set percentage of the total units onsite, and that these units are to be comparable in type and size to the market rate units. As a result, a significant percentage of units created under IDP are studios and one-bedroom units. To increase the provision of two- and three-bedroom units suitable for families, BPDA staff are willing to recommend to the BPDA Board that the Proponent be allowed to provide a set percentage of the total residential square footage rather than a set percentage of the total units, in order to provide these larger units.
3. The Proponent has agreed to provide a contribution toward a housing stabilization fund, which fund will be utilized to assist East Boston-based nonprofits in their efforts to purchase and then impose income restrictions on existing market-rate housing units. This fund is intended to address ongoing displacement pressures in and around East Boston, and to be similar to funding from the City's Acquisition Opportunity Program. This contribution will be funded in two equal installments, with the first installment due thirty (30) days after the date that the appeal period ends (without appeals having been filed) for all discretionary Boston approvals for the Project, and the second installment due thirty (30) days after the appeal period ends (without appeals having been filed) for a building permit for the construction of the first building in Boston. The amount to be funded is being discussed with the City and elected officials.
4. As a mixed-use development, significant linkage funds will flow to the Neighborhood Housing Trust. These funds are then dispersed citywide. The developer can, however, take the "Housing Creation" option, accelerating payments to the fund to support individual projects. The Proponent should discuss making commitments to using the Housing Creation option to 1) increase affordability within Suffolk Downs, and 2) supporting affordable housing developments within East Boston.

Response: As set forth in the revised PDA Plans, in addition to committing to include 13% affordable housing on-site, the Proponent has made the following commitments respecting affordable housing off-site in East Boston:

1. Under the Mayor's Inclusionary Development Policy housing program under the Mayor's Order Relative of Inclusionary Development dated December 9, 2015 (the "IDP"), the focus has been on providing a set percentage of the total units on-site, and having these units be comparable in type and size to the market rate units. As a result, a significant percentage of units created under the IDP are

studios and one-bedroom units. To increase the provision of large family-friendly units (e.g., three-bedroom units), at the discretion of the BPDA, the Proponent is willing to set aside 13% of the total square footage of all dwelling units in Boston, including both for-sale and rental units, as affordable units under the IDP, rather than a set percentage of the total number of dwelling units, to facilitate the provision of larger affordable units.

2. At the discretion of the BPDA, the Proponent has agreed to provide the on-site affordable rental units at an average of 70% of Area Median Income ("AMI"), instead of providing all such units at 70% of AMI. The maximum AMI of any individual affordable unit would be no more than 80% of AMI. This change from what is typical practice under the IDP is allowed in this area of the City and will assure that residents with incomes below 70% of AMI can be served and can access housing at Suffolk Downs.
3. The Proponent has agreed to provide a contribution of five million dollars (\$5,000,000) toward a housing stabilization fund, which fund will be utilized to assist East Boston-based nonprofits in their efforts to purchase and then impose income restrictions on existing market-rate housing units. This fund is intended to address ongoing displacement pressures in and around East Boston, and to be similar to funding from the City's Acquisition Opportunity Program. This contribution will be funded in two equal installments, with the first installment due thirty (30) days after the date that the appeal period ends (without appeals having been filed) for all discretionary Boston approvals for the Project, and the second installment due thirty (30) days after the appeal period ends (without appeals having been filed) for a building permit for the construction of the first building in Boston.
4. The Project is a Development Impact Project that will trigger the payment of substantial Housing Exaction payments, which the BPDA and City of Boston intend to utilize, working with East Boston-based nonprofits, to seek to facilitate their efforts to create, or cause to be created, housing units for occupancy exclusively by low and moderate income residents of East Boston. If requested by the City, the Proponent will make linkage payments for each building when a building permit is issued rather than over seven years as allowed by the Code, applying a discount rate in accordance with customary City practices.
5. In cooperation with City and Commonwealth officials, the Proponent has agreed to seek infrastructure funding (e.g., grants, bond funding and/or other incentive programs) for the extensive roadway and infrastructure work required in connection with the Project. For any such funds that are received up to an agreed-upon maximum amount, after accounting for the costs of obtaining such infrastructure funding, rather than keeping the net financial benefits thereof the Proponent will on a dollar-for-dollar (1:1) basis make additional contributions to the housing stabilization fund described above.

In addition, in response to feedback from Councilor Edwards regarding the Proponent's fair housing commitments set forth in the PDA Plans, the Proponent has

expanded the scope of the anti-discrimination protections set forth therein. Specifically, Section 10.A of the PDA master Plan has been modified to include additional protections for classes of persons not previously addressed in the Non-Discrimination Covenant. The revised language gives protections based on a person's race, religious creed, religion, color, national origin, ancestry, age (except for senior housing that complies with applicable legal requirements), sex, sexual orientation, gender identity, disability or handicap, familial status, children, marital status, source of income, receipt of public assistance, rental assistance or housing subsidy, veteran status, or genetic information.

1.5 Transportation and Mobility

Comment: *The Proponent must submit additional supporting information demonstrating the quantitative methodology underlying the internal street dimensions, including all vehicular, bus, bicycle, parking/loading/pick-up, and turn lanes. For example, do you have estimated trip volumes for each street? It would also be helpful to understand the methodology for deriving trip volume estimates and how these relate to parcel level, or district level, planned buildout. This should include methodology for deriving trip volume estimates and how these relate to parcel level, or district level, planned buildout. This analysis should also include a traffic demand management plan with the intent of reducing vehicular demand while optimizing alternate modes of mobility.*

Response: The proposed street layouts, which have been reviewed in detail with various City of Boston departments, incorporate ample sidewalk facilities, bicycle facilities (cycle tracks/bike lanes), on-street parking and travel lanes. These rights-of-way also adequately accommodate all underground utilities and follow the Boston Complete Street Guidelines as well as the new Smart Utilities Guidelines. A detailed Transportation Demand Management (TDM) plan for the site, which is geared toward optimizing alternate modes of transportation, was included in the DEIR/DPIR.

The internal site volumes are based on the trip generation projections that came directly from the state's CTPS Model. VHB evaluated vehicle distribution throughout the site using an internal gravity model. This evaluation informed and validated the roadway cross section designs that have been presented to date. Because this exercise is focused on vehicle traffic, the location of the parking garages served as the primary "gravity" for vehicles entering the site from all available access points. Other factors that were considered included the number of spaces in each garage, as well as the density and mix of uses for each development phase. The distribution of site-generated traffic between the available access points is based primarily on the results of the CTPS Model. Once the vehicles were distributed to the site driveways, they were assigned to the most likely and most logical routes to get them to their destination on-site. Figures 3a-b illustrate the internal volumes at key locations within the site. The gravity model spreadsheets are provided in Appendix B.

1.5.1 Curbside Uses

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

Response: Approximately 365 curbside time-limited parking spaces are anticipated to be provided (Figure 4a). There will be one curbside drop off/pick-up area associated with each building, typically to be located near its lobby. All buildings will have off-street parking and off-street loading areas incorporated within the building footprint. There are anticipated to be up to four on-site bus stop locations (Figure 4b). The Proponent will work cooperatively with the City of Boston and MBTA to determine potential bus routing and final bus stop locations within the site. All curbside strategy components will be reviewed in detail as part of design review as each building and/or phase goes forward.

1.5.2 Layout of Streets

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

- › *Tomasello Drive from connection at Route 1 A*
- › *Boulevard from connection with Tomasello Drive*
- › *Neighborhood Main Street from connection with Park Drive*
- › *Connection to Walley Street Neighborhood Residential Street*

Response: The locations and dimensions of future rights-of-way in which public easements will be granted are included in the updated PDA Plans, and detailed roadway plans will be subject to review and approval during the development review process pursuant to Section 15 of each PDA Development Plan. Detailed plans for all roadways within or serving a phase will be subject to review and approval at the start of each Phase, to ensure that the roadways for the entire Phase will work together.

Figures 2a-g illustrate a sample of the dimensions of several key rights-of-way within the Project Site. Figures 5a-d illustrate the proposed roadway sections for the four street that are planned to be designated as public streets. Figure 6 identifies the roadways that are accessible to buses, shuttles, and emergency vehicles.

1.5.3 Transportation Mitigation

Comment: *In numerous locations, the draft PDA documents refer to mitigation measures identified in the DPIR. As a result of changes to the transportation modeling as requested by MassDOT as well as significant changes to required mitigation, many of the mitigation*

measures identified in the DPIR are now obsolete; referring to these mitigation measures no longer makes sense. Moreover, new mitigation measures will be forthcoming in the FEIR. It would be helpful to have a consolidated list of mitigation measures.

Response: As part of the Master Plan Project, extensive off-site roadway, traffic, and safety improvements are proposed at many of the locations in the study area. In some areas the scope of improvements varies from that proposed in the DEIR/DPIR based on MassDOT guidance and local input during the DEIR/DPIR comment process and a series of discussions related to the development of the final mitigation program. Changes made to the mitigation program since the DEIR/DPIR are as follows:

Route 1A Corridor

The mitigation plan for the Route 1A corridor has undergone changes from that proposed in the DEIR/DPIR. In their comments, MassDOT asked that several corridor cross sections be analyzed and developed based on a reduced width “superstreet” or displaced left turn concept. Each of the three concepts provided only two southbound lanes for through traffic versus the three lanes initially discussed and included in the DEIR. The primary concern with the wider three lane southbound cross section was that the capacity afforded with the Boardman Street mitigation plan would release an excessive amount of traffic (an increase of approximately 50% over that which is currently released through the signal) to the Ted Williams and Sumner Tunnels. Given capacity constraints within each of the tunnels during the existing morning peak period, the additional traffic would more than likely seek non-regional roadways to access the tunnels adding a significant amount of demand to the local street system in East Boston.

In addition, MassDOT requested an analysis of a plan that involved maintaining the existing Route 1A/Boardman Street intersection with the addition of the third northbound through lane, responding to concerns associated with local access and truck diversions associated with the superstreet design. This plan also introduced direct left turns from Route 1A SB to Tomasello Drive and modification of the Tomasello Drive corridor near Route 1A from a jughandle type of operation to one that now includes a traffic circle for reversal of U-turns approximately 350 feet east of Route 1A.

Each of the concepts was analyzed and presented to the Transportation Working Group that included representatives of multiple State and local agencies (MassDOT, MBTA, Massport, the City of Boston, the City of Revere, MEPA), which generally met every other week for several months. The accepted concept for the Route 1A corridor has been based on retention of the existing Route 1A/Boardman Street intersection configuration. The accepted Route 1A design, which eliminates the third southbound lane that had been proposed as part of prior proposals, minimizes the potential impacts of additional traffic into the tunnel and the potential of additional diversions into the East Boston neighborhood, while maintaining and extending the existing left hand turn lane from Route 1A southbound to Boardman Street. This is expected to improve access to the existing Orient Heights and East Boston neighborhoods.

The accepted design includes two southbound through lanes with an exclusive left turn lane and an 8- to 10-foot shoulder approaching Boardman Street. Northbound, there are three through lanes and an exclusive left turn lane. Both the northbound and southbound left turn lanes have been extended. The northbound right turn lane has been replaced with the third shared through and right turn lane, which has been added for a distance of approximately 1,200 feet approaching Boardman Street. The Boardman Street approaches and departures have remained unchanged. A twelve-foot shared use path corridor (two-foot roadway buffer and ten-foot path) has been added within the Route 1A northbound work area and extended to the Tomasello Drive corridor. At that point it will be continued to the Revere Beach Parkway/ Winthrop Avenue corridor in Revere through the site along Tomasello Drive. The intention of this design is to contain all roadway works and bicycle accommodations within the existing 100-foot State Highway Layout (SHLO). It may be necessary to modify an existing slope and drainage easement area along the eastern side of the SHLO to include provision for a sidewalk easement within a limited portion of the existing easement. As noted above, the Proponent has agreed to utilize cost savings from the modified Route 1A design to provide funding for upgrades to the public transit system serving East Boston and Revere, and that there will be no reduction in the cost of transportation mitigation improvements being provided by the Project.

A Tomasello Drive traffic signal control will be provided. The southbound roadway, which will be based on the existing two through lane condition, will be widened to four lanes to allow for a continuation of two through lanes and the addition of two left turn lanes to the site. The four-lane section will generally extend from the “jughandle” intersection near the Boston/Revere City Line to Tomasello Drive. Within this area, the southbound shoulder will be eliminated and replaced with a limited width curb offset. Northbound, the three through lanes from the Boardman Street intersection will be maintained with an exclusive right turn lane added to access the site.

Within Revere, changes to the Route 1A mitigation program have also been provided. Based on MassDOT direction, the proposed median break and traffic signal at Furlong Drive that were associated with the superstreet concept have been eliminated. Route 1A will generally carry two through lanes in each direction. Northbound, the three-lane section leaving Tomasello Drive will be eliminated several hundred feet north of the jughandle and then added as a turn lane to Furlong Drive and an exit to the Revere Beach Parkway/Winthrop Avenue corridor. This change is based on MassDOT’s concern of overloading the northbound Route 1A approach to Bell Circle and further impacts on the Route 1A and Route 60 corridors north of Bell Circle. However, based on a City of Revere request, the two-lane section, shoulder and median offset will be wide enough to accommodate the future restriping of Route 1A to allow a third through lane. Southbound, the proposed merge lane from the Revere Beach Parkway will be maintained and access changes will be made to Railroad Avenue. The proposed mitigation plan is provided in Figures 7a-7c.

Day Square

Day Square includes the following five intersections:

- › Neptune Road at Saratoga Street
- › Neptune Road at Bremen Street
- › Bennington Street at Neptune Road
- › Bennington Street at Vienna Street
- › Neptune Road at Route 1A NB off-ramp

Conceptual improvements were outlined for Day Square in the DEIR/DPIR. However, through discussions with the Transportation Working Group and with the acknowledgement that multiple stakeholders have interest in future improvements in this area, the concepts provided in the DEIR/DPIR are not being advanced at this time. Rather, the Proponent will participate in a working group to conduct further study of Day Square and develop design alternatives that address the various stakeholders' concerns.

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

Response: The revised PDA Plans provide information regarding aggregate maximum anticipated average daily trip numbers generated by the Project upon completion of each Phase (see, e.g., Section 8 of the revised PDA Master Plan). The provisions of the PDA Plans require that if, upon completion of a Phase of the Master Plan Project (including the associated traffic mitigation), the amount of traffic generated by the Project exceeds the amount of traffic that is anticipated (see Table 1 below), then the Proponent shall work with the City of Boston to implement additional transportation demand management efforts to reduce the amount of traffic to the projected level. Table 1 below indicates the approximate projected project-generated new average daily trips by phase for the Master Plan Project (Boston and Revere). Note that each Phase as listed below includes the corresponding phase of development in Revere (e.g., "Phase 1" include Phase 1 in Boston and phase 1 of development in Revere), and final numbers adjusted to account for mitigation measures are to be confirmed upon completion of the CTPS traffic analysis.

Table 1 Daily Vehicle Trips by Phase

	Phase 1	Phase 2	Phase 3	Phase 4	Phase 5	Full Build
	2.76 MSF	3.28 MSF	4.38 MSF	4.40 MSF	1.38 MSF	16.20 MSF
New Average Daily Trips	25,520	27,550	26,400	26,400	9,180	114,780

Comment: *Section 11(k) refers to an approximately \$50M program of off-site transportation improvements, transit facilities and related infrastructure. As a result of recent conversations between the Proponent, Mass DOT and the City, the list of transportation related mitigation improvements has changed substantially. This full modified list of mitigation measures should be identified in the PDA documents. Where fees may be paid in lieu of improvements, the PDA documents should stipulate that, over time, the fees will be indexed to inflation.*

Response: The list of transportation related mitigation improvements has not changed substantially except that the Route 1A design has been modified as described in further detail in this AID and, at the request of MassDOT, the Proponent has agreed to utilize cost savings from the modified Route 1A design to provide funding for upgrades to the public transit system serving East Boston and Revere. The specific public transit improvements to be funded by the Proponent are under discussion with MassDOT and will be included in the MEPA Final EIR for the Project. There will be no reduction in the cost of transportation mitigation improvements being provided by the Project. Based upon these changes, the list of transportation related mitigation improvements has been updated and is provided in updated PDA Master Plan Exhibit J and PDA Development Plan Exhibit F.

Comment: *The Proponent has previously committed to a publicly-accessible shuttle connecting the project site to South Station and the South Boston Waterfront. This commitment should be further detailed in the supplemental filing and memorialized in the PDA Master Plan. This should include a specific timeline tied to development milestones that will trigger implementation of this service.*

Response: The Proponent is committing to providing publicly-accessible shuttle services connecting the project site to South Station and the South Boston Waterfront, to be implemented as warranted by demand upon occupancy of commercial components of the Master Plan Project's Phase 2. The Proponent is also committing to annual monitoring of project trips, beginning at the completion of Phase 1 of the Master Plan Project. Based on the monitoring results, the Proponent will refine shuttle services to best support ridership needs as they may change with build-out of the Master Plan Project.

Comment: *The SID [submitted by the proponent on May 1, 2019] states that the Proponent has completed an existing conditions and code assessment of both Suffolk Downs and Beachmont Stations and has submitted these to the MBTA for further review. Are these available for City/BPDA review? Will the Proponent plan to fund or make any improvements related these assessments?*

Response: The Proponent completed an existing conditions and code assessment of Suffolk Downs Station and Beachmont Station in January 2019, which has been submitted to the MBTA for further review. Under the Proponent's agreement with the MBTA, the MBTA must be consulted before the assessment may be shared with governmental authorities. The assessment will be shared with BPDA upon completion of the MBTA's review and this consultation process. The Proponent

continues to coordinate with the MBTA and MassDOT regarding potential funding contributions towards transit upgrades, including potential improvements to Suffolk Downs Station and Beachmont Station. Additional details on the Proponent's potential funding contributions towards improvements to Beachmont Station and Suffolk Downs Station will be provided in the FEIR and are subject to continuing coordination and review by the MBTA and MassDOT.

As noted above, the Proponent has made changes in the previously-proposed traffic mitigation for the Route 1A Corridor based on extensive discussions with MassDOT, the City of Boston and the City of Revere, and in connection with those changes has agreed to utilize cost savings from the modified Route 1A design to provide funding for upgrades to the public transit system serving East Boston and Revere. (There will be no reduction in the cost of transportation mitigation improvements being provided by the Project.) The amount of the contribution to transit upgrades is under discussion with the MBTA.

1.5.4 Bicycle and Pedestrian Facilities

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

Response: The Proponent agrees to fund full design and construction of a connection to the East Boston Greenway from Constitution Beach to the southeast corner of the Project Site following along Bennington Street and Walley Street. This will include a designated pedestrian/bicycle crossing at Bennington Street and Walley Street with appropriate traffic safety measures.

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

Response: Cycle tracks have been included on a number of internal streets in addition to the Main Street Corridor. In addition, Figures 2a-2g illustrate conceptual layouts for various Complete Street types including Parkway, Neighborhood Main Street, Neighborhood Connector, Shared Street, Boulevard, and Neighborhood Residential. These include bicycle facilities such as separated cycle tracks and on-street bicycle lanes. At full-build out the Project Site will include approximately 9,200 linear feet (lf) of bicycle lanes and 8,100 lf of cycle track. The Project team has

confirmed that in several locations there is sufficient room to convert currently proposed bicycle lane segments to additional cycle tracks segments. The Proponent will continue to work with the BPDA during design review to study the potential implementation of additional cycle tracks on the site.

1.5.5 Parking and Loading:

Comment: *The Proponent should make clear statements regarding a sitewide parking strategy and commitments to monitor parking needs/demand over the build-out of the Project with the goal of further reducing the number of parking spaces in future construction phases, as warranted. The distinct phases at which this analysis and determination takes place should be made explicit.*

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

Response: The parking proposed for the Master Project has been determined based on similar TOD sites situated in urban contexts similar to the PDA Area. The parking program has been developed using parking ratios that are lower than what typically would be proposed for a comparable project that did not have excellent access to public transportation. The following parking ratios have been used to determine the amount of parking to be provided for development in the PDA Area:

- › Office: 1.0 spaces per 1,000 SF
- › Lab: 1.0 spaces per 1,000 SF
- › Residential: 0.5 to 1.0 space per unit, with an overall maximum of 0.75 spaces/unit
- › Hotel: 0.5 spaces per room
- › Retail: 0.5 spaces per 1,000 SF

Since previous filings, the overall parking capacity within the Boston portion of the Master Plan Project has been reduced to approximately 6,760 spaces from 7,216 (456 fewer spaces) to meet the above parking ratios. For both environmental and economic reasons, the Developer shares the goal of further limiting the construction of parking based on actual demand. As each phase (Phases 1 through 5 in Boston) is built-out, the Proponent will monitor parking use to avoid overbuilding parking in subsequent phases and will look for opportunities to reduce any unnecessary or underused parking. As set forth in the updated PDA Plans, the Proponent will submit parking monitoring data to the BPDA, along with any appropriate recommendations for reducing the amount of parking, prior to the commencement of each Phase after Phase 1.

As previously stated in the DPIR and SID filings, in the earlier phases of development, parking will be in part accommodated in existing surface parking lots. This interim surface parking provides flexibility to prevent overbuilding structured parking in the earlier phases. Utilizing the unbuilt portions of the Project Site allows the Proponent to evaluate parking needs and trends before additional structured parking is constructed in the later phases.

1.5.6 Public Benefits

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

Response: Cycle tracks, bicycle lanes and number of bike share stations have been delineated in earlier filings. Quantities for bicycle parking and shower/changing facilities have been calculated using BTM Bicycle Parking Guidelines. The manner, type and location of bicycle parking and shower facilities can be determined with BTM and BPDA during design review for each stage of construction. It is the Proponent's intention that all bicycle parking meet BTM bicycle parking guidelines for location, characteristics, scale and dimension.

The number of proposed bicycle share stations was determined through an analysis of existing bike share station spacing within the Boston Central Business District, where average distance 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 twelve overall within the site, in addition to two bike share stations at the MBTA transit stations. The specific location of the bicycle share stations will be determined in consultation with BTM and BPDA during the development review process for each stage. The location of the bicycle share station at Suffolk Downs MBTA station will be determined in consultation with BTM, BPDA and MBTA and must be carefully planned alongside any future plans for Suffolk Downs Station and the Walley Street corridor.

1.5.7 Emergency Services Access

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

Street will be critical for fire, police, and EMT services to access the Suffolk Downs site from existing locations in East Boston.

Response: The on-site roadway network was designed to allow for access by emergency vehicles (Figure 6). The turning radius and clearance templates of the largest anticipated fire safety vehicles to be used on site were overlaid with the proposed street network to ensure adequate space will be provided. The main entrance in Boston to the site is along Route 1A, and an emergency access-only connection has previously been included from Walley Street to the Suffolk Downs Plaza area of the site. Additional access points are available from the City of Revere.

1.5.8 Maintenance

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

Response: Maintenance and repair of the privately-owned on-site roadway network, including snow plowing, will be performed by a Suffolk Downs building owner's association ("SDOA") and funded by contributions from individual building owners. Each building owner will be required to be a member of the SDOA pursuant to a recorded agreement binding on all parcels within the Suffolk Downs site, and assessments for roadway expenses as well as the cost of managing and maintaining open spaces and other shared facilities will be a lien against each parcel if not paid when due. It is anticipated that the SDOA will contract with third-party service providers to handle on-site work such as plowing, landscaping, roadway repairs when needed, etc. Maintenance of rights of way will meet, at minimum, City of Boston standards. On-site maintenance facilities are not anticipated given that services will be provided by third party service providers.

1.6 Resiliency

Comment: *The Climate Ready Boston Coastal Resilience Solutions program will be conducting further analysis of East Boston with a focus on the Belle Isle Marsh and Chelsea Creek areas in 2020. This will provide a greater understanding of vulnerabilities to current and future coastal storm events and sea level rise, as well as the types of coastal interventions and design options to protect landside areas. The Proponent should provide substantial resources to further advance the design plans and options that result from this process, including previous commitments to refine and expand a resiliency assessment of regional barrier along Bennington Street and Route 1A with the potential to protect the project site and abutting properties.*

Response: The Project team has developed a detailed Hydrologic and Hydraulic (H&H) model to represent existing and proposed conditions of the Sales Creek freshwater and tidally influenced system, as well as a site-specific coastal hydraulic

model used to estimate flood elevations and wave heights, evaluate the protection of the Project site, determine the effect of the Master Plan Project on neighboring properties, and assist in designing the site to avoid potential impacts to neighboring properties. The Proponent has also committed to facilitate installation of a tide gate at the eastern limits of the Project site and provide a 50% contribution to the upgrading of the Bennington Street DCR pump station up to \$2.625 million. Finally, the Proponent has committed to supporting the funding of a feasibility study for district-scale flood protection measures along Bennington Street to protect off-site areas that are at risk of current and future flooding, as described in more detail below. The cost of construction of an off-site regional scaled climate change barrier is beyond the means of the Suffolk Downs Project. Nevertheless, the Proponent will work with the State, City of Boston and City of Revere on seeking regional solutions to climate change.

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

Response: The Proponent has committed to supporting the funding of a feasibility study for district-scale flood protection measures along Bennington Street to protect off-site areas that are at risk of current and future flooding. This study will be completed prior to Phase 2 commencing. The cost of construction of off-site flood protection barriers are beyond the means of the Project. However, the Proponent will work with the State and City to seek regional solutions to protection from climate change impacts. The Proponent does not anticipate undertaking any additional resilience studies respecting the Route 1A corridor. The Project has limited frontage on Route 1A and no frontage on Chelsea Creek, and any barrier intended to address flooding from Chelsea Creek will depend on many other property owners with land fronting along Chelsea Creek.

Comment: *The Proponent should provide ongoing resources to support the maintenance and operations of the Department of Conservation and Recreation's tide gate facility on Bennington Street.*

Response: The tide gate and pump station on Bennington Street will continue to be owned and operated by DCR. The Proponent has committed to providing 50 percent of the cost up to \$2.625 million to upgrade the Bennington Street Pump Station.

Comment: *Each phase of the development program must also adequately address City resiliency policies, programs and standards that are current at the time of design development. Buildings on the project site must be responsive to the BPDA's Sea Level Rise Design Flood Elevation.*

Response: As part of the development process required by the PDA Plans, there will be additional public review for each development phase. As previously described in

the DEIR, the Proponent is meeting Boston's most recent guidelines and is targeting a Finished Floor Elevation of 20.5 feet BCB for non-critical buildings and 21.5 feet BCB for critical buildings, infrastructure and ground floor residential, per the BPDA guidance, to provide one to two feet of freeboard above the projected 2070 BFE.

1.7 Parks and Recreation

1.7.1 Recreation Facilities Ratios

Comment: *The proposed open space system at Suffolk Downs should maintain or improve the ratios of active recreational facilities to residential population within East Boston.*

Response: The Proponent has committed that 25% of the overall Suffolk Downs site will be maintained as publicly-accessible open space, with the same 25% open space commitment applying equally in both Revere and Boston. Approximately 27 acres of open space will be developed and maintained in Boston, along with an additional approximately 13 acres of open space in Revere, all of which will be available for use by Boston residents.

The Proponent has evaluated how the site's open space can accommodate active recreation space. The following active recreation facilities (or other reasonably equivalent facilities) are anticipated to be constructed:

- › One (1) 3-acre Multipurpose Field (discussed further below)
- › One (1) Flexible Field (discussed further below)
- › Four (4) Basketball Courts
- › Three (3) Tennis Courts / Pickle Ball Courts
- › Five (5) Playgrounds
- › Five (5) Bocce Courts

As part of the development process required by the PDA Plans, there will be additional public review for each development phase, and each individual building and open space within Boston, and this review process will require open space design submissions and review by the BPDA and other relevant departments and agencies, including the BPRD. The process also requires public notice, community meetings, and opportunity for comments from elected officials, the Impact Advisory Group, and the public. Further determinations about specific design and locations of active recreational facilities, including courts, field, playgrounds and other areas, will be made as part of this additional development review process.

1.7.2 Codifying Recreation Uses

Comment: *The proponent should provide the mechanism by which it will codify the active recreational uses that are shown on the conceptual plans to ensure that they*

are constructed at the level shown to serve the active recreational needs of the new neighborhood and beyond.

Response: Construction of open space will be completed in accordance with the phasing requirements set forth in the PDA Plans, with development of open space to be phased along with building development. At all times throughout the development of the Project, including at the conclusion of each phase, a minimum of 25% of the then-developed portion of the Project Site will be open space. The PDA Plans require additional City and public review for each development phase and individual building and open space within Boston, as noted above. This review process will include review of design and location of active recreational uses by the BPDA, the BPRD, and other relevant departments and agencies. As noted, the process requires public notice, community meetings, and opportunity for comments from elected officials, the Impact Advisory Group, and the public. The proposed active recreational uses for each individualized open space will be vetted through this process, allowing for each use to be evaluated at the time of its development, taking into account the needs and preferences of local residents (including future local residents) and others.

1.7.3 Protection in Perpetuity

Comment: *Open space that is required, negotiated or proposed as mitigation for Article 80 or through the MEP A approval process and the EEO EA approval as a public benefit should be quantified to ensure that it does not change with future amendments to the PDA development plan. BPRD notes that the PDA and any MEPA documents are subject to amendment and are not binding when it comes to the permanent protection of open space. BPRD requests that open space that is proposed for stormwater management, negotiated as mitigation for a PDA, or approved as a public benefit by the EOEEA, should be permanently protected through conservation restrictions approved by the EOEEA or through transfer to public ownership.*

Response: The Proponent's commitment to construct and maintain 25% of the overall Suffolk Downs site as publicly-accessible open space, with the same 25% open space commitment applying equally in both Revere and Boston, is a critical component of the Project. As noted, approximately 27 acres of open space will be developed and maintained in Boston and an additional approximately 13 acres of open space in Revere, all of which will be available for use by Boston residents.

The obligation that the Proponent build and maintain 25% of the Boston portion of the site as publicly-accessible open space is set forth and detailed in the PDA Master Plan and the PDA Development Plans and will also be set forth in the Cooperation Agreement between the Proponent and the BPDA. The Proponent has also made the following additional commitments to convey fee title and perpetual easement rights to the Boston Parks Department for key open space areas within the Boston portion of the site:

- › Orient Heights Park (approximately 1.0 acre) This open space will be built along a portion of the southern edge of the Suffolk Downs site, adjacent to the Orient

Heights neighborhood and Waldemar Avenue, and will include active recreational uses (i.e. playground and courts or other facilities), seating areas, and pedestrian and bicycle pathways that connect to the larger Suffolk Downs open space network. Following completion of construction of this open space area and associated roads and buildings, the Proponent will cause fee title to this open space to be conveyed to the City of Boston for use as a public park and will enter into an agreement with the BPRD for the SDOA to maintain the open space in perpetuity.

- › Gateway Park Open Space Areas (approximately 1.5 acres in the aggregate) This open space will be built along the new Parkway road and be accessible from both the Active Linear Park System and the Central Common. These Gateway Park open space areas are anticipated to include several active recreational areas such as basketball/tennis/pickle ball courts, playgrounds, and a dog park. Following the completion of the construction of this open space area and associated roads and buildings, the Proponent will cause fee title of the open space to be conveyed to the City of Boston for use as a public park and will enter into an agreement with BPRD for the SDOA to maintain the open space in perpetuity.
- › Multipurpose Field within Central Common (approximately 2.3 acres) The Central Common open space will be the largest open space at Suffolk Downs and will include a large multipurpose field of approximately 2.3 acres. This multipurpose field will be designed and constructed to support sports such as soccer, events (including community and civic events), and other active recreational uses. Following completion of construction of the multipurpose field, the Proponent will grant non-exclusive open space easements pursuant to an easement agreement with the City of Boston, providing for perpetual public use of the multipurpose field, and will also enter into an agreement with BPRD for the SDOA to maintain the open space in perpetuity. This agreement will provide that the SDOA will maintain the multipurpose field and that the SDOA and BPRD will have shared programming rights, with BPRD to oversee programming of the field for 50% of its hours of operation, and with the SDOA retaining control over programming for the remaining 50% of its hours of operation.
- › Flexible Field within Active Linear Spine (approximately 0.7 acres) The Flexible Field area within the Active Linear Spine will be constructed as a rectangular open field that will be suitable for smaller scale recreational purposes. This could include youth soccer, yoga and other active recreational uses. Similar to the multipurpose field above, this flexible field will be subject to a non-exclusive open space easement agreement with the City of Boston, providing for perpetual public use of the flexible field, and will enter into an agreement with BPRD for the SDOA to maintain the open space in perpetuity. This agreement will provide that the SDOA will maintain the field and that the SDOA and BPRD will have shared programming rights, with BPRD to oversee programming of the field for 50% of its hours or operation, and with the SDOA retaining control over programming for the remaining 50% of its hours or operation.

The above commitments are set forth in the revised PDA Master Plan, in Section 5.c.i thereof.

1.7.4 Phasing of Open Space

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

Response: Construction of open space will be completed in accordance with the phasing requirements set forth in the PDA Development Plans, with development of open space to be phased along with building development, with the portion of the PDA Area that has been redeveloped at any given time to consist of a minimum of 25% protected open space.

Table 2 Open Space by Phase

Phase	Site Area	Open Space	Percent
1	921,098	252,648	27%
2	1,148,638	389,862	34%
3	874,303	168,914	19%
4	1,030,632	175,975	17%
5	748,153	196,945	26%
Total	4,722,824	1,184,344	25%
Acres	108	27.2	

As per the PDA Plans, as development progresses, additional City and public review will be required for each development phase and individual building within Boston, and this review process will require design submissions and review respecting open space areas by the BPDA and other relevant departments and agencies, including the BPRD. The process also requires public notice, community meetings, and opportunity for comments from elected officials, the Impact Advisory Group, and the public. And as noted above, as development progresses, the PDA Plans require additional public review for each development phase, individual building and open space within Boston.

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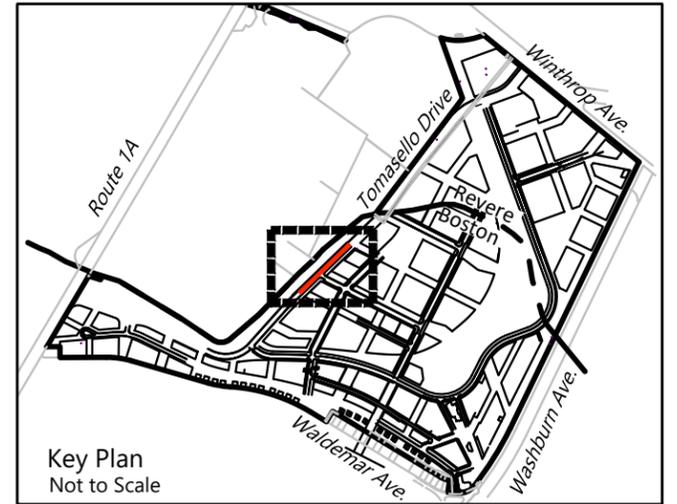
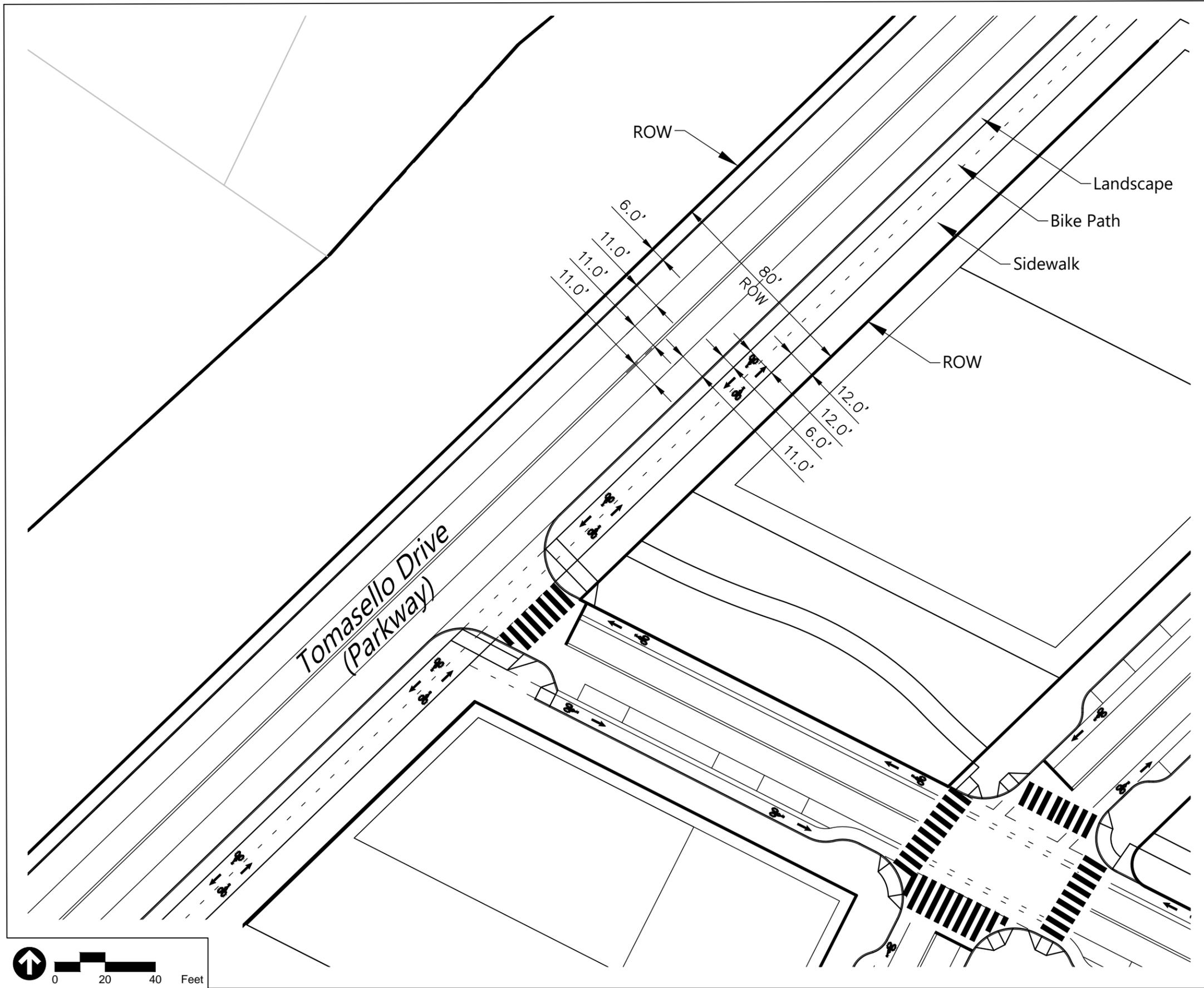


Figure 2a
Anticipated Project Site ROW Dimensions

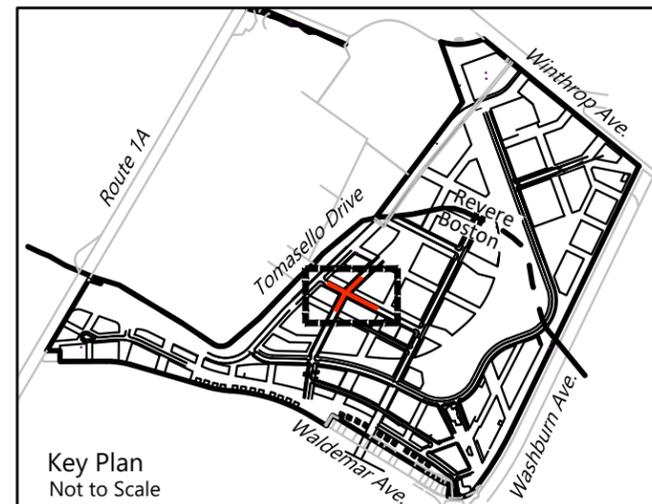
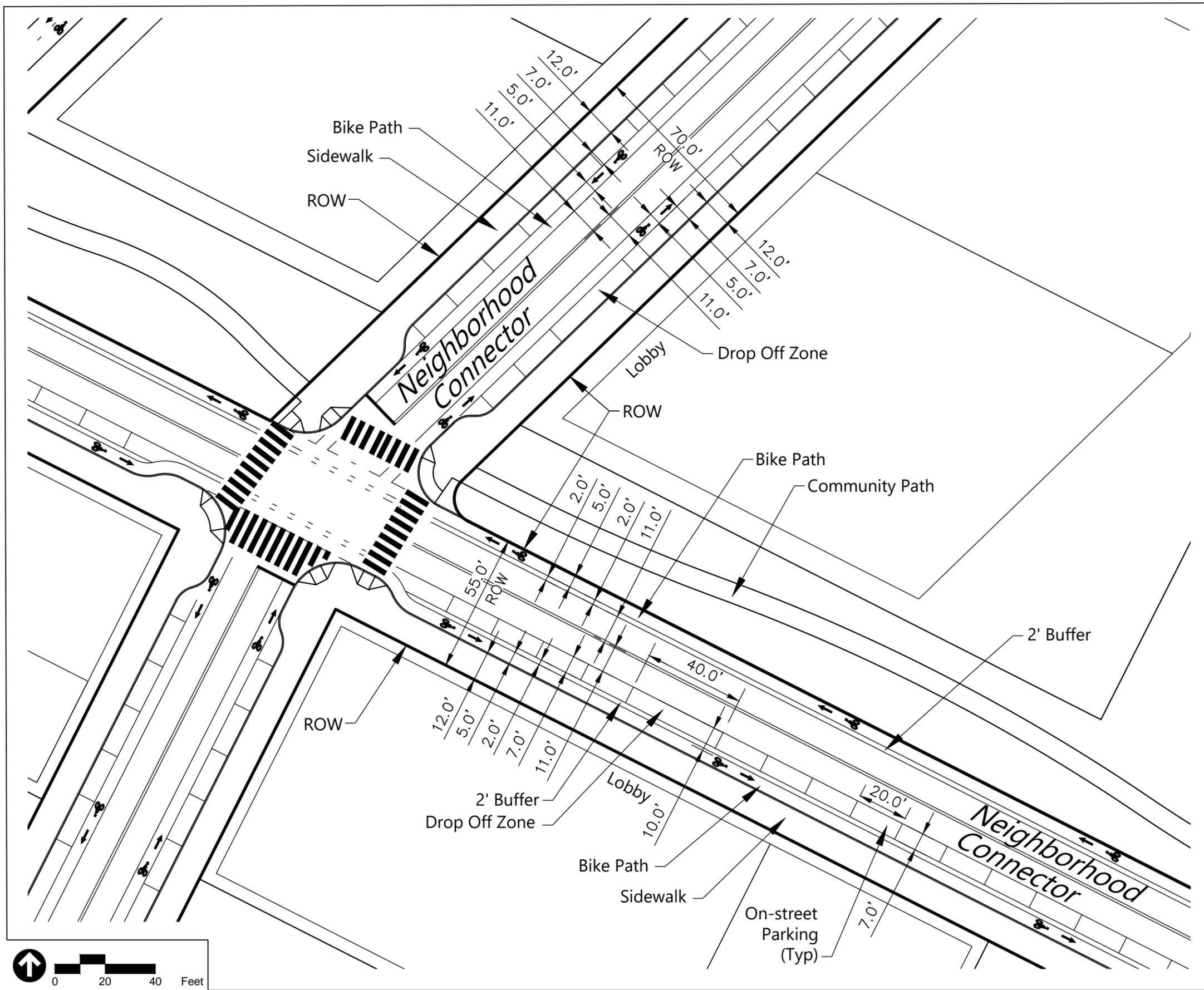


Figure 2c
Anticipated Project Site ROW Dimensions

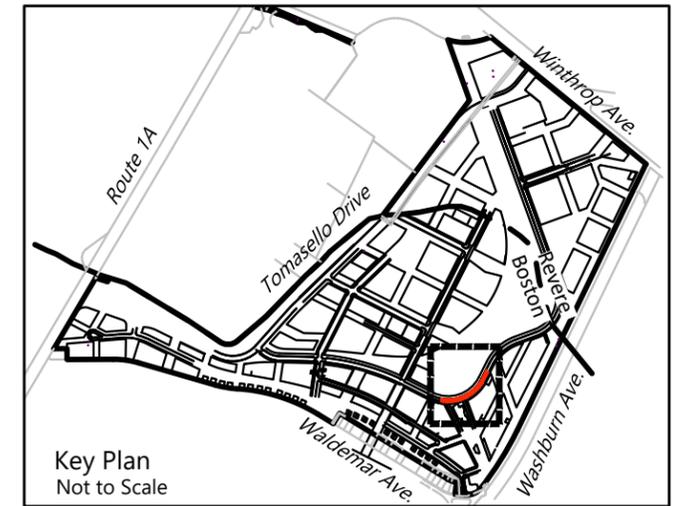
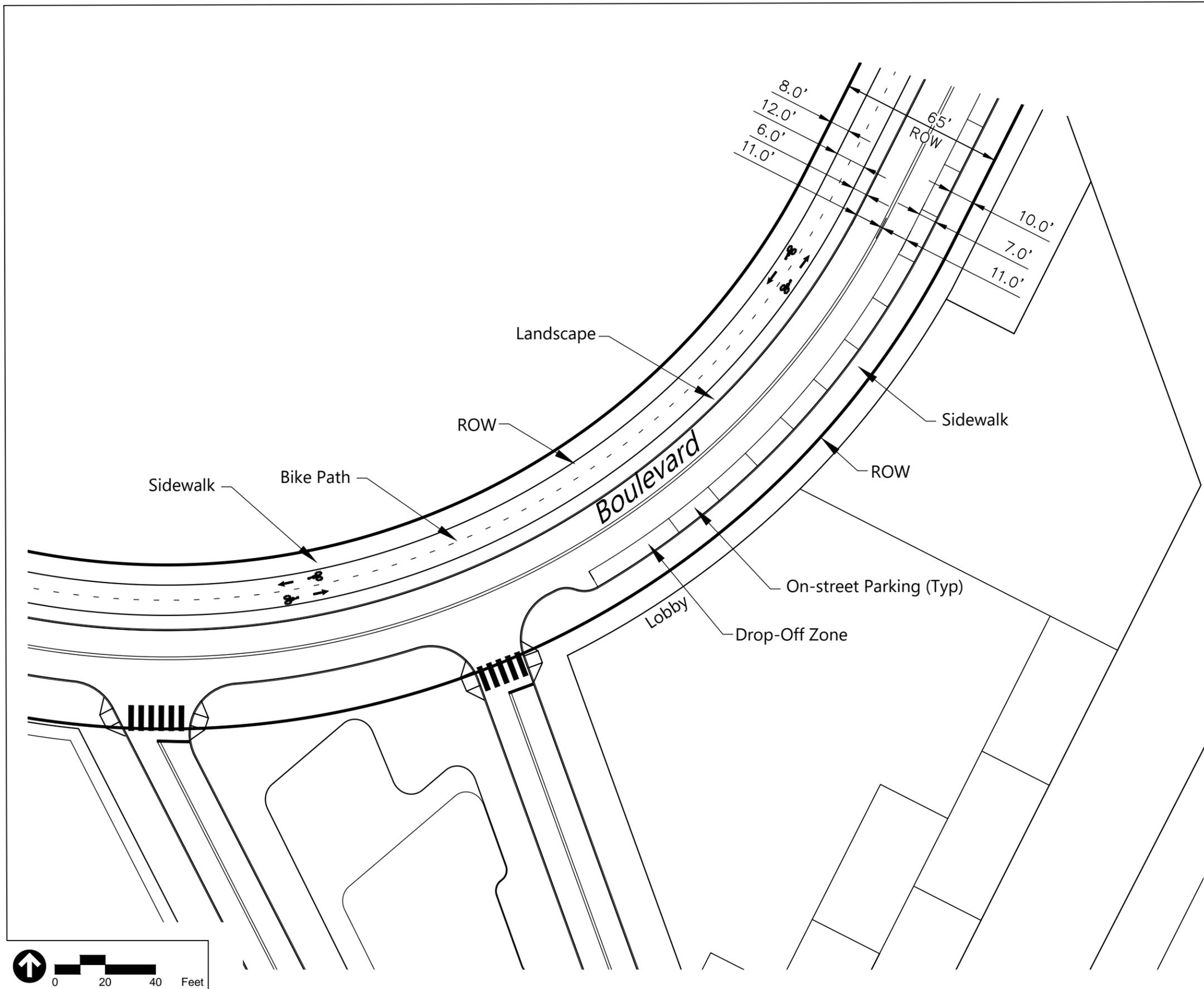


Figure 2d
Anticipated Project Site ROW Dimensions

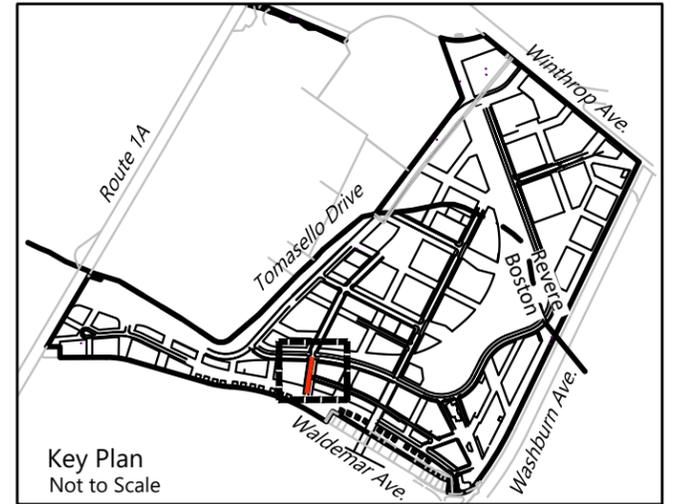
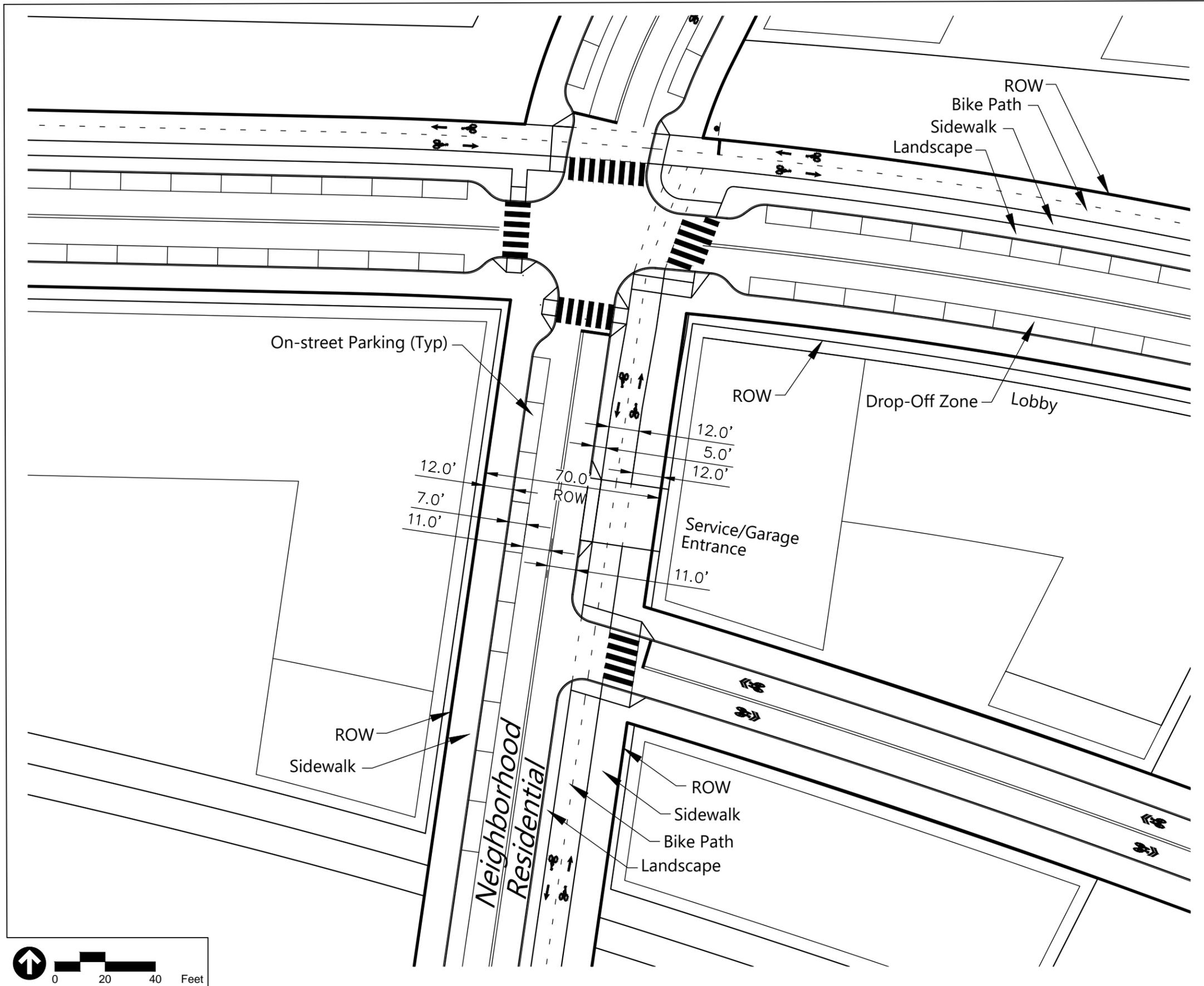


Figure 2e
Anticipated Project Site ROW Dimensions

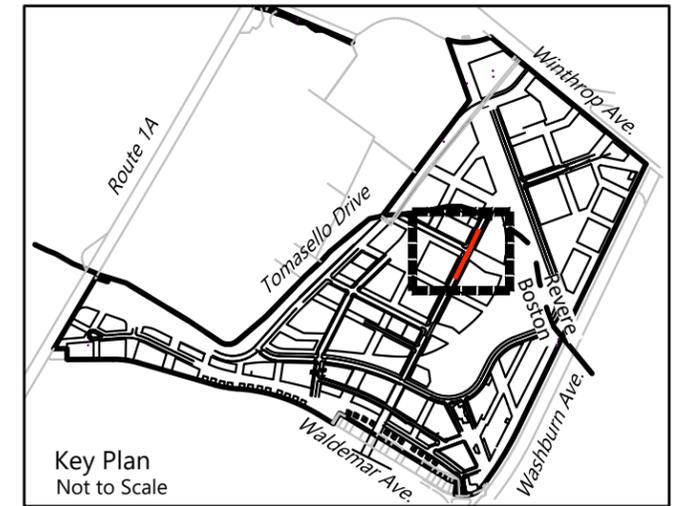
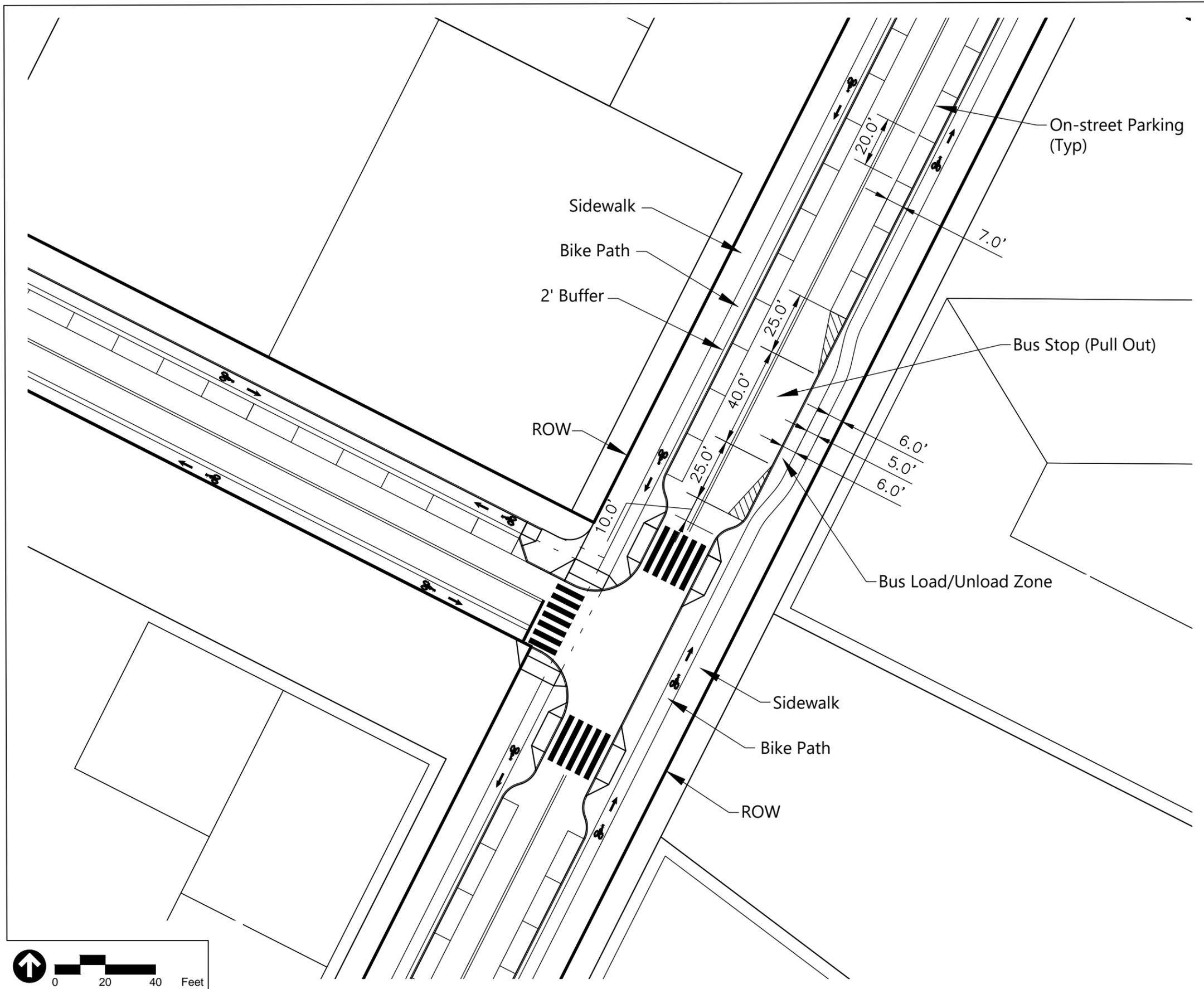


Figure 2f
Anticipated Project Site ROW Dimensions

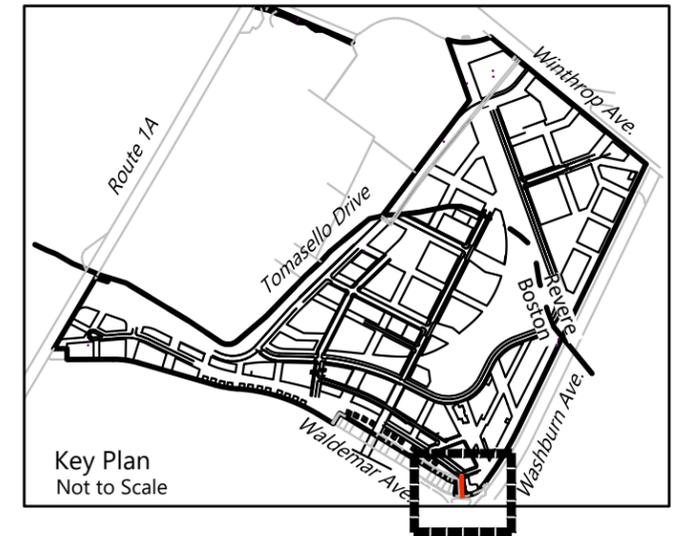
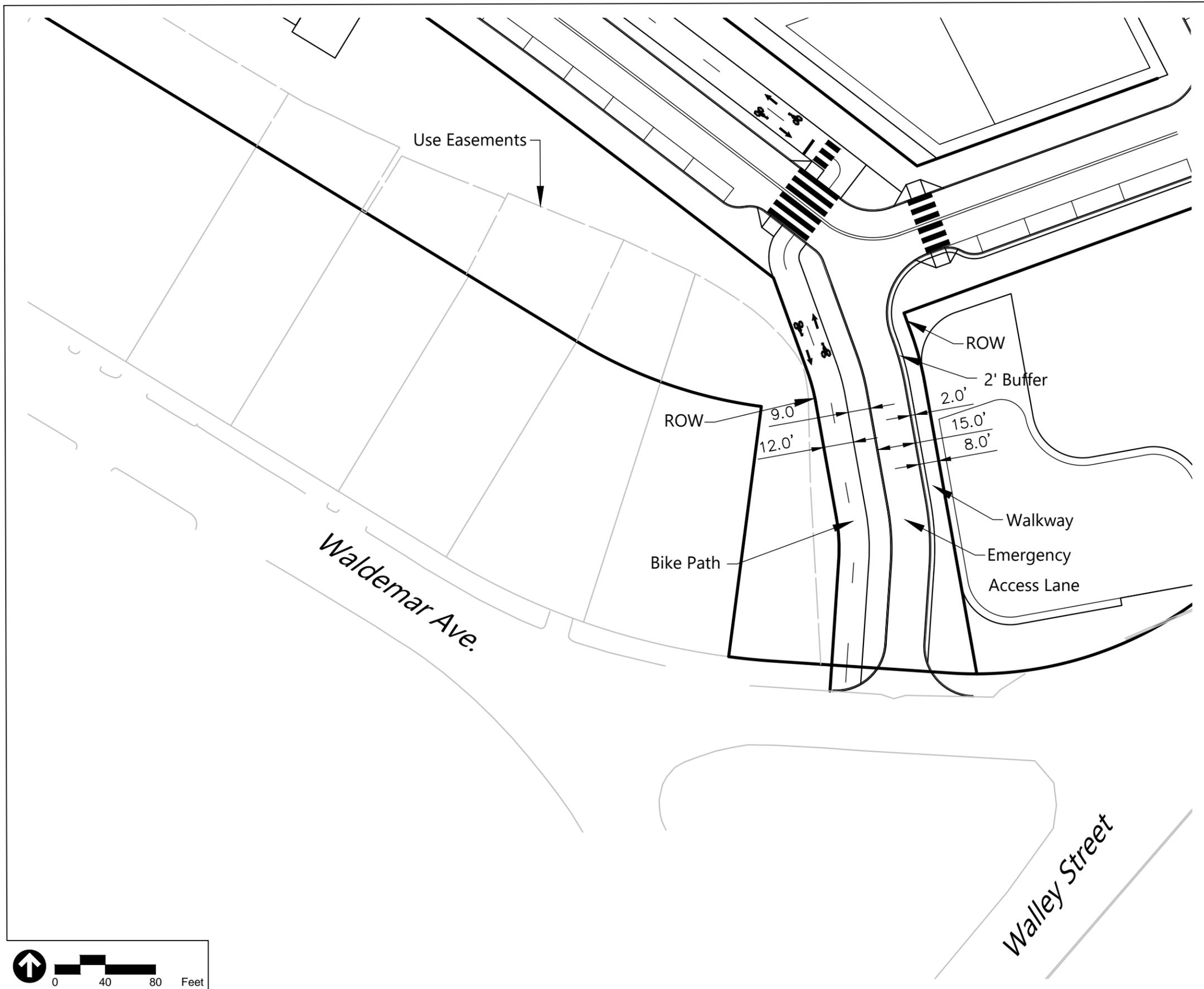


Figure 2g
Anticipated Project Site ROW Dimensions

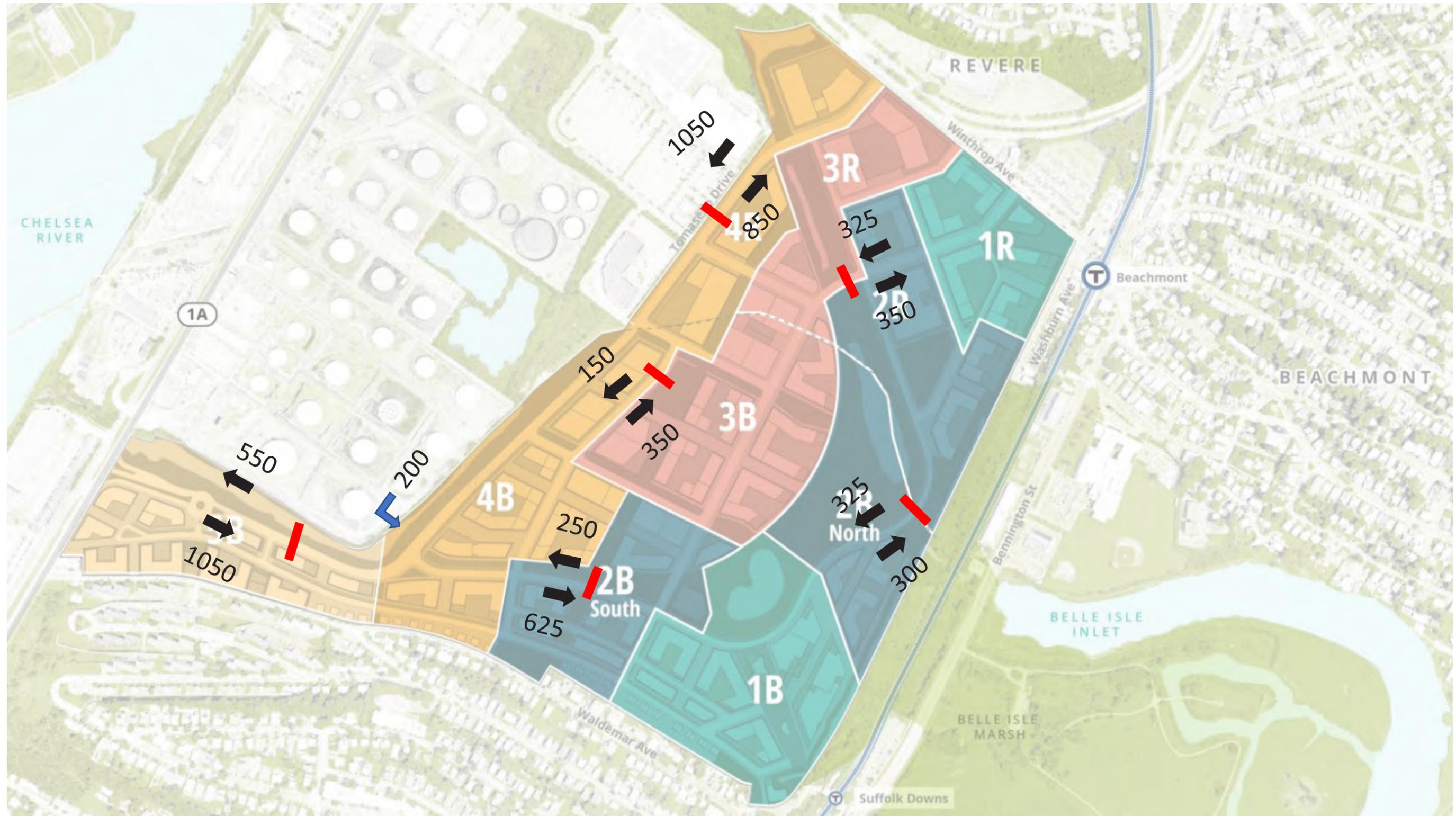


Figure 3a
Anticipated Internal Traffic Volumes - AM

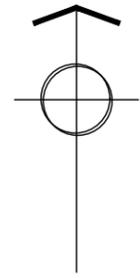


Figure 3b
Anticipated Internal Traffic Volumes - PM

Legend

- Property Line
- - - Town line
- Proposed Lobby Locations
- ▲ Proposed Service and Loading Locations
- On-Street Parking (Revere)
- On-Street Parking (Boston)

Note:
A 15% loss factor was incorporated into the on-street parking calculations to account for elevated crosswalks, drop-off areas, and bus stops.



	On-Street Parking
Boston	369
Revere	181
Total	550

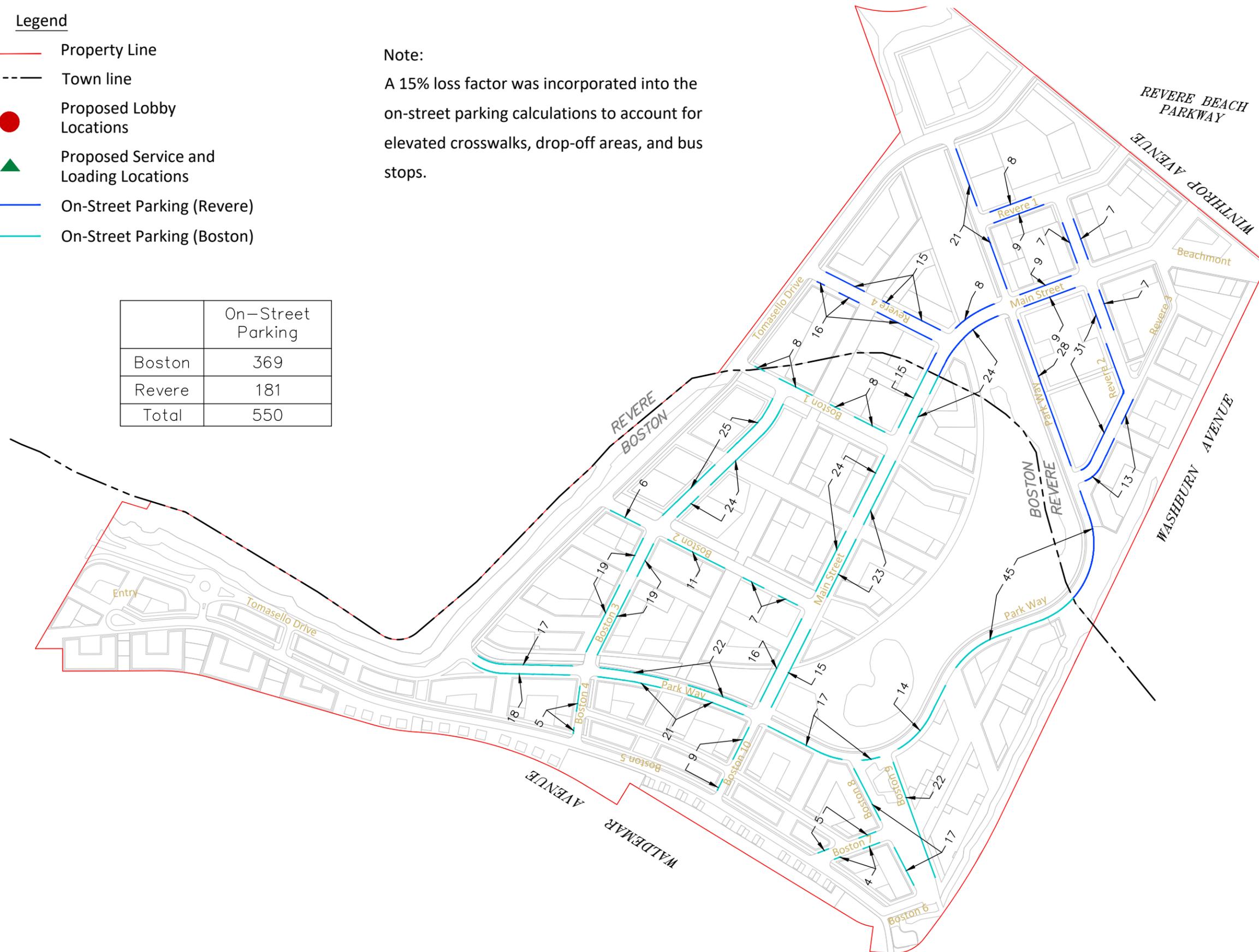


Figure 4a
Anticipated On-Street Parking Spaces

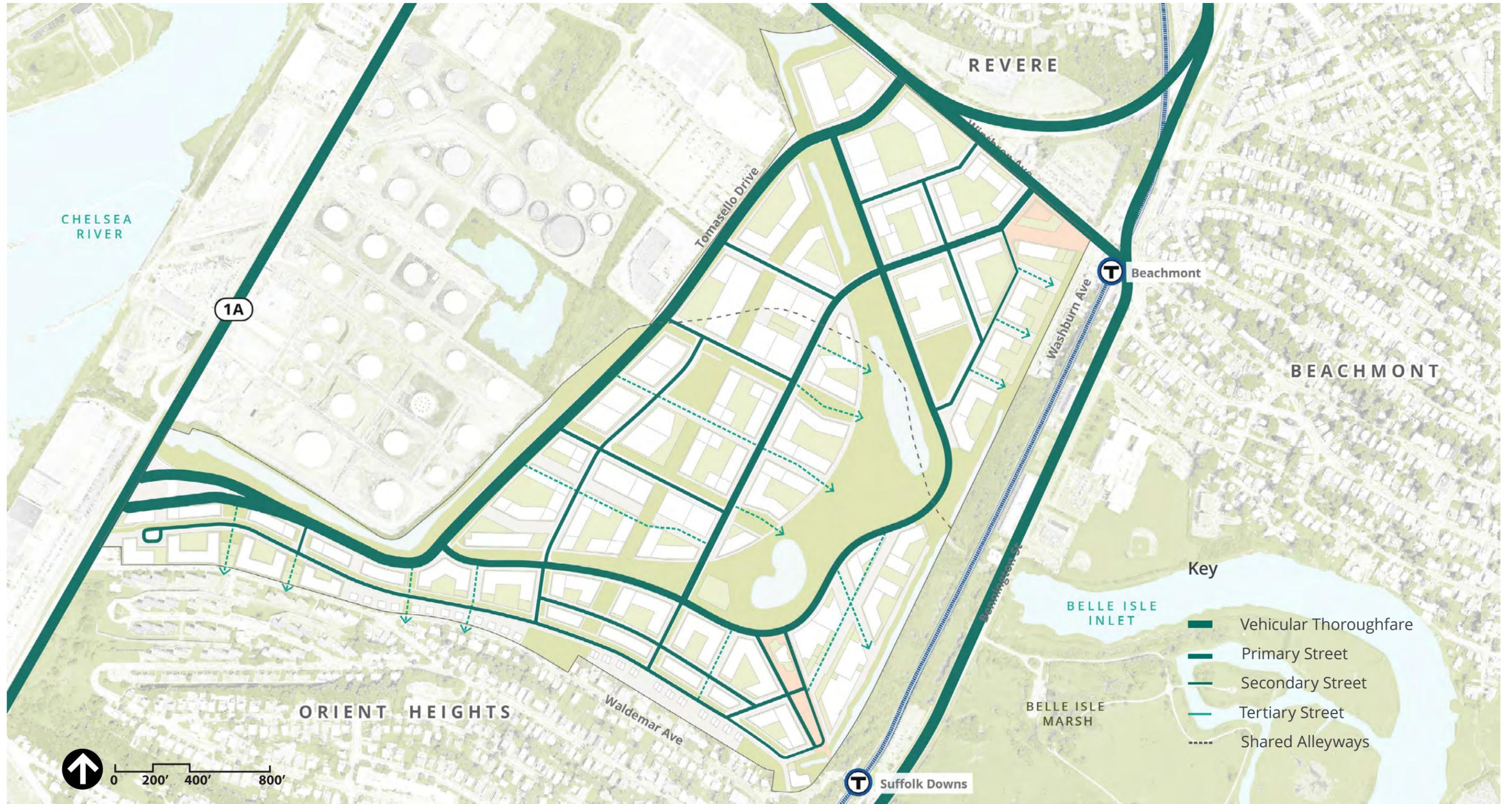


Figure 4b
Anticipated Circulator Shuttle Routes

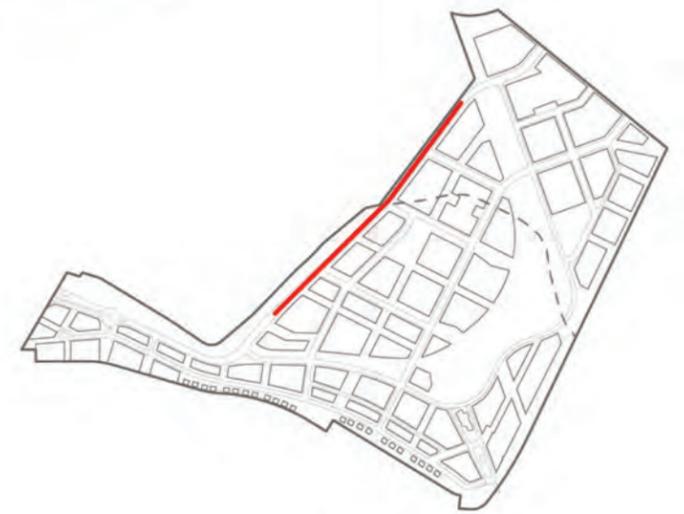


Figure 5A
Tomasello Drive from connection at Route 1A

Suffolk Downs Redevelopment
Boston & Revere, Massachusetts

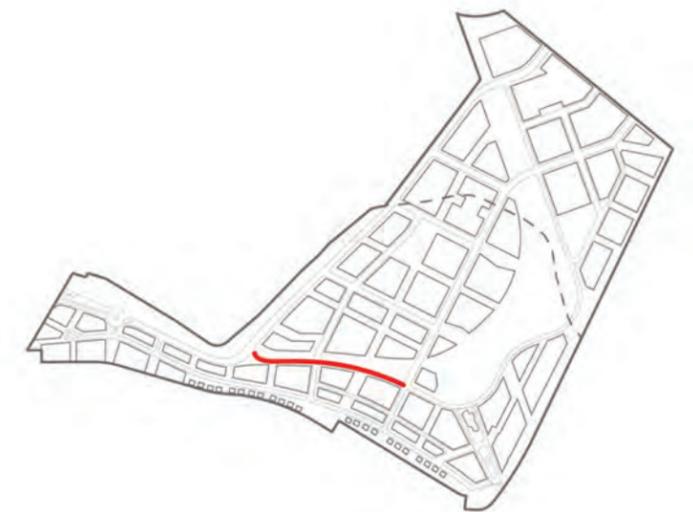
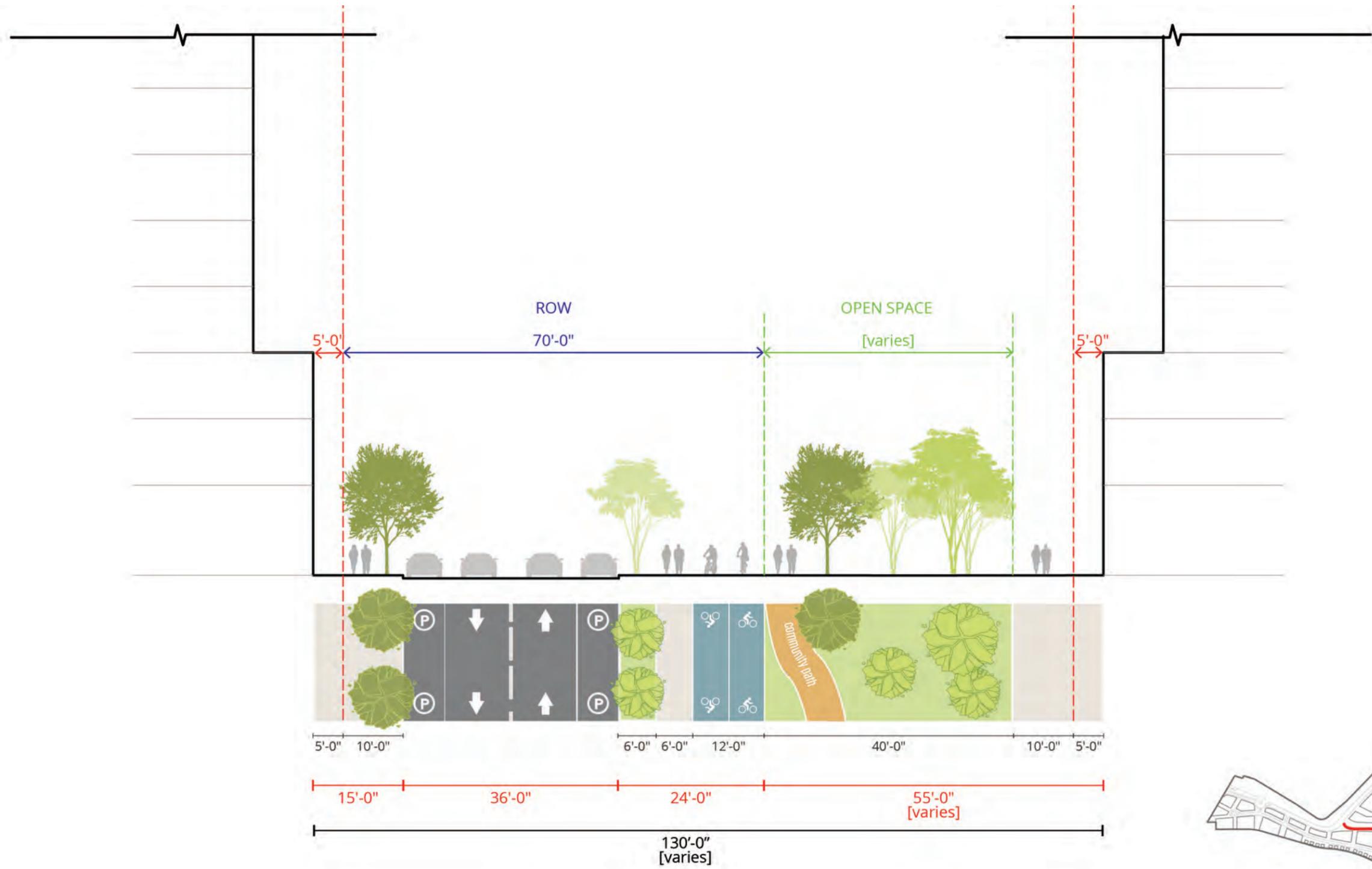


Figure 5B
 Boulevard from connection with Tomasello Drive
Suffolk Downs Redevelopment
 Boston & Revere, Massachusetts

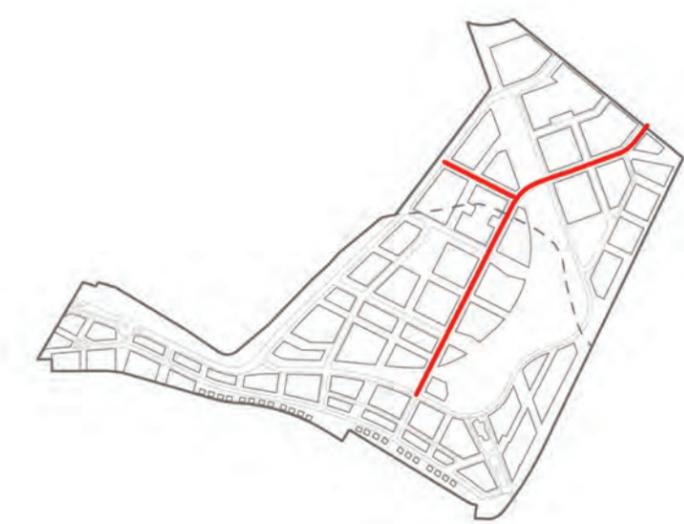
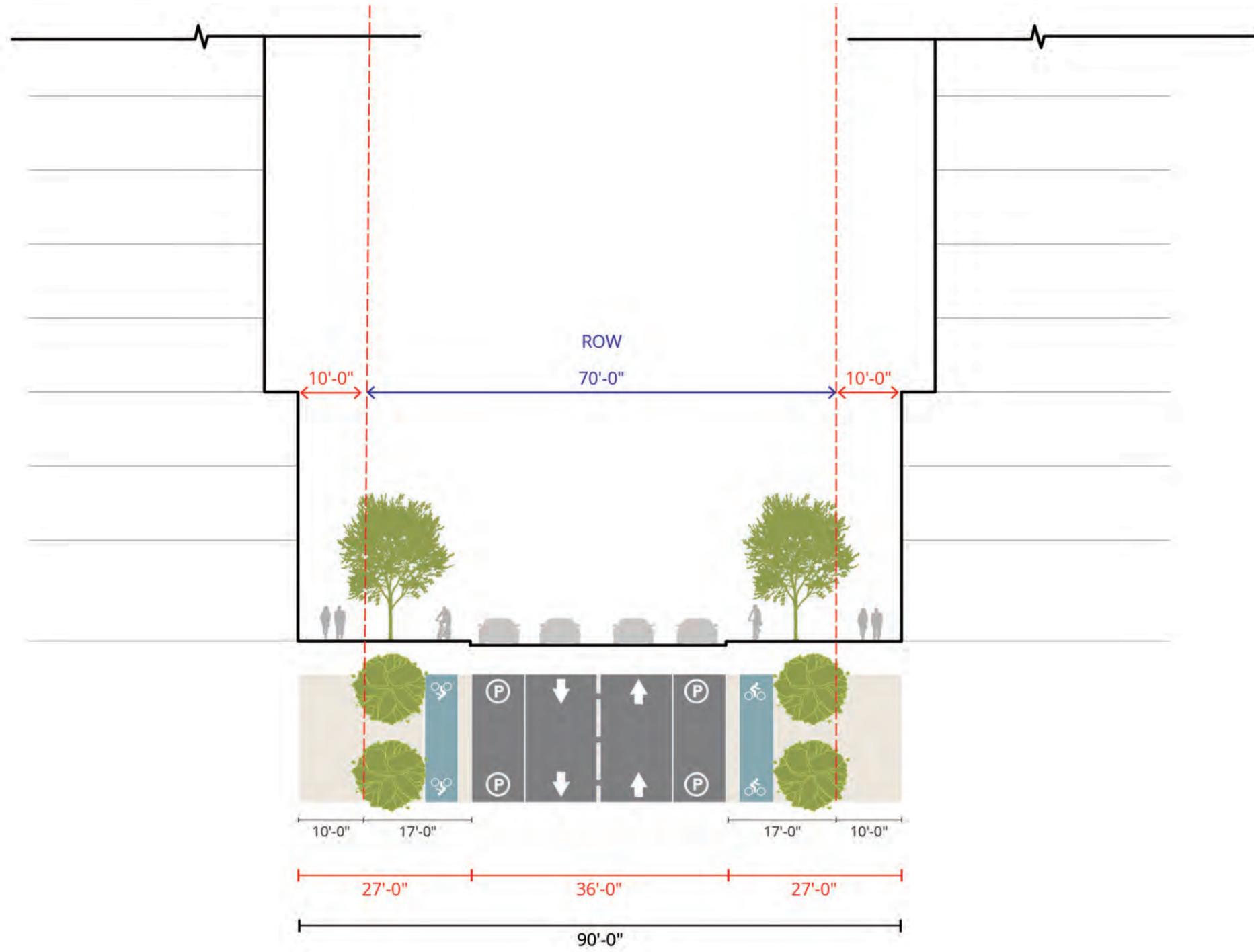


Figure 5C
 Neighborhood Main Street from connection with Park Drive
Suffolk Downs Redevelopment
Boston & Revere, Massachusetts

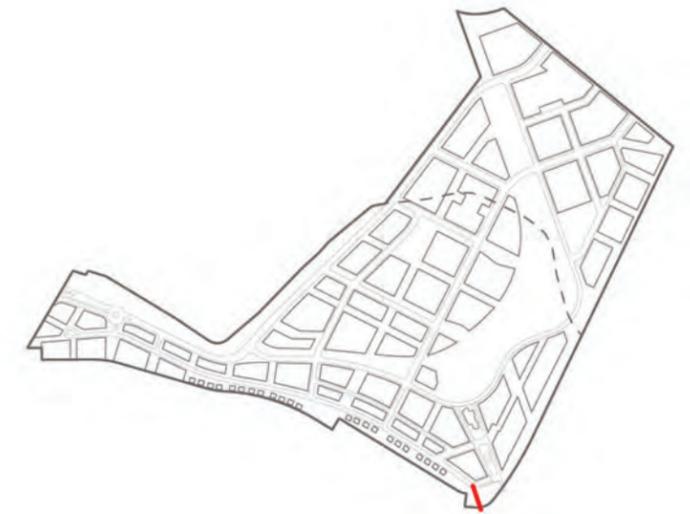
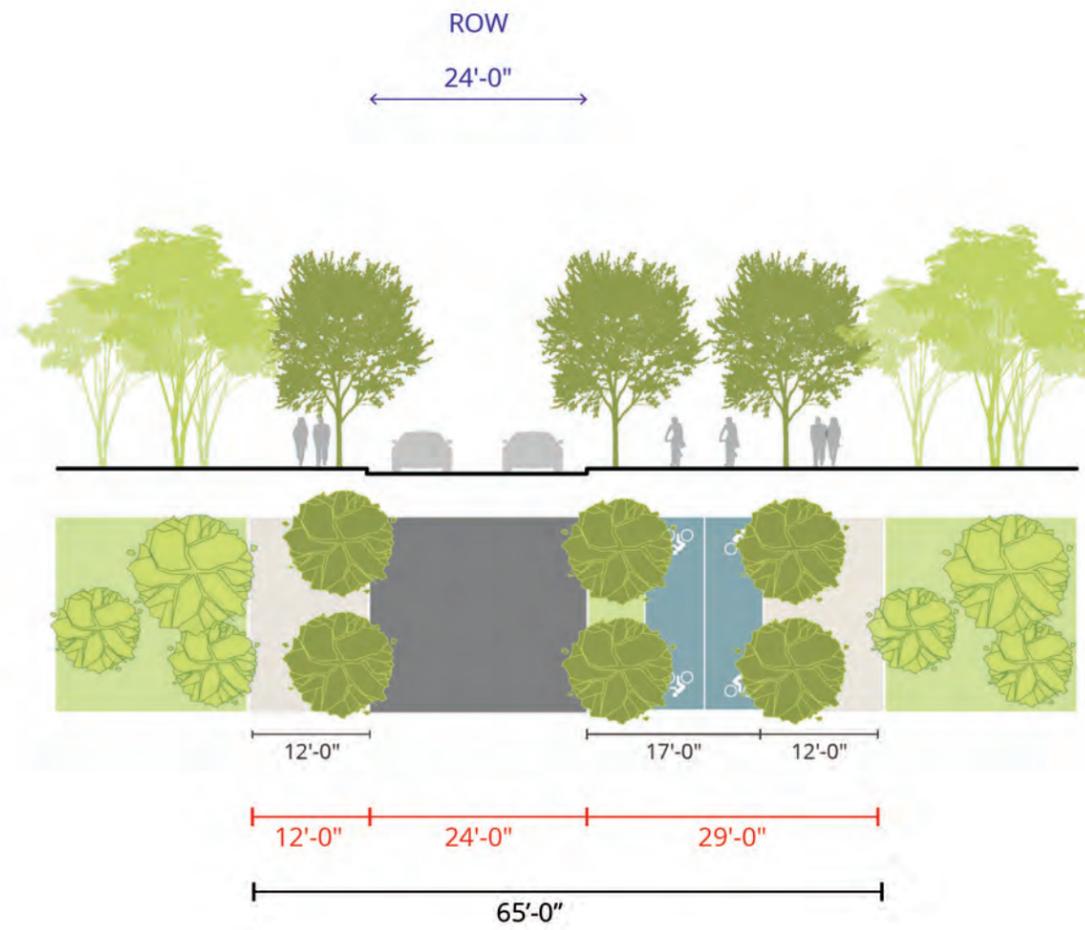


Figure 5D
 Connection to Walley Street Neighborhood Residential Street
Suffolk Downs Redevelopment
Boston & Revere, Massachusetts



Figure 6
Anticipated Accessible Roadways

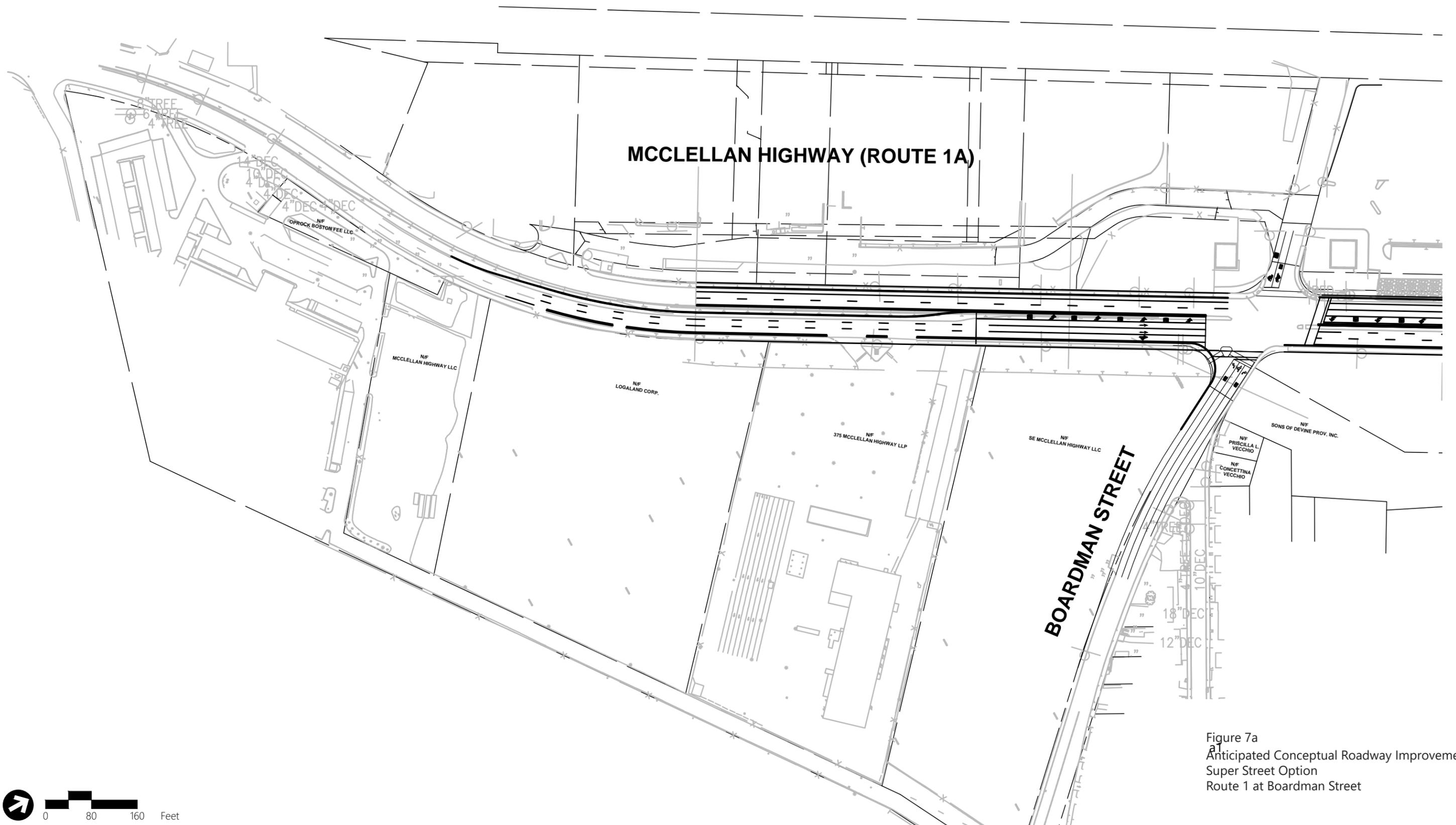


Figure 7a
Anticipated Conceptual Roadway Improvement
Super Street Option
Route 1 at Boardman Street

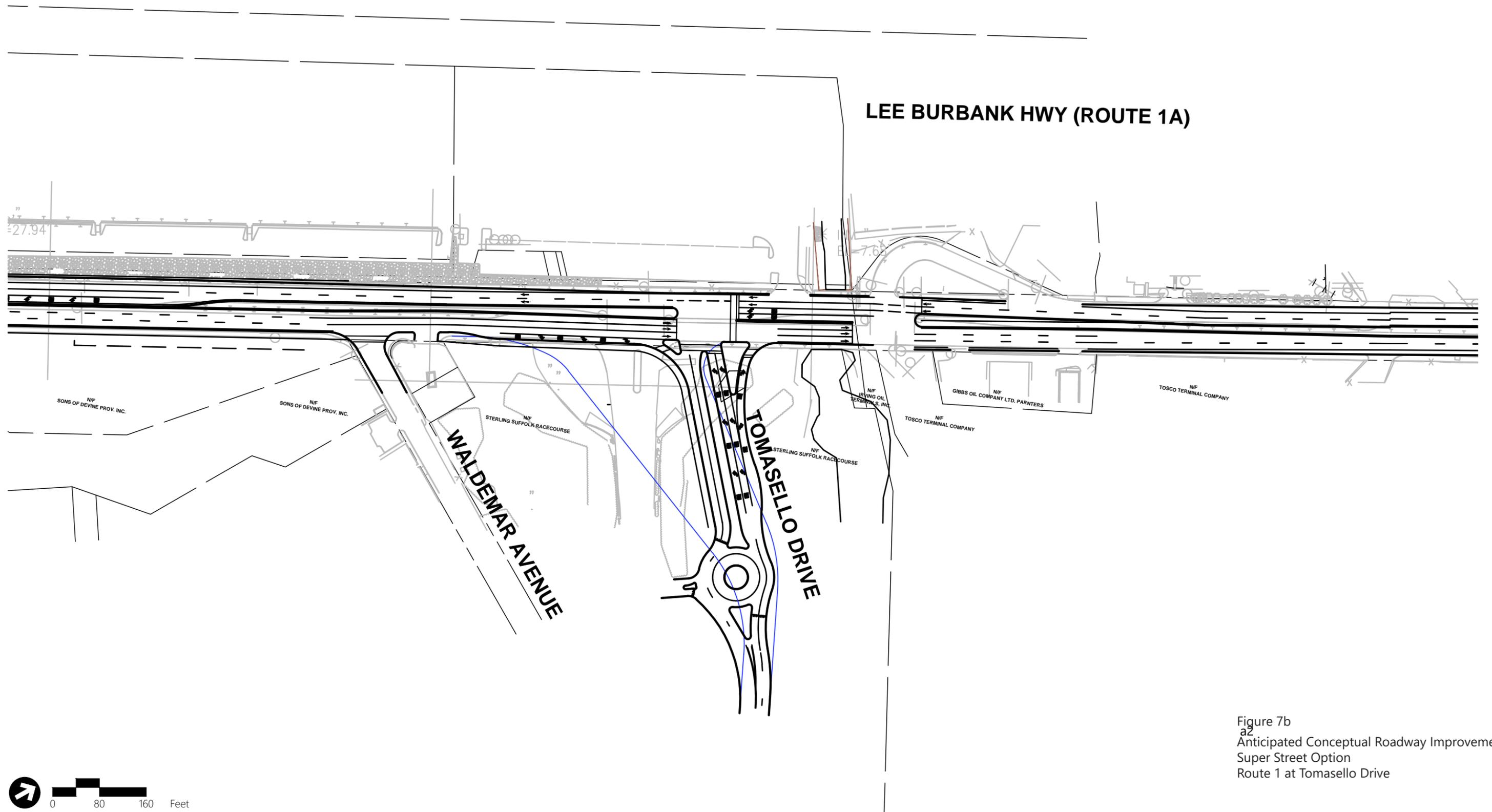


Figure 7b
a2
Anticipated Conceptual Roadway Improvement
Super Street Option
Route 1 at Tomasello Drive



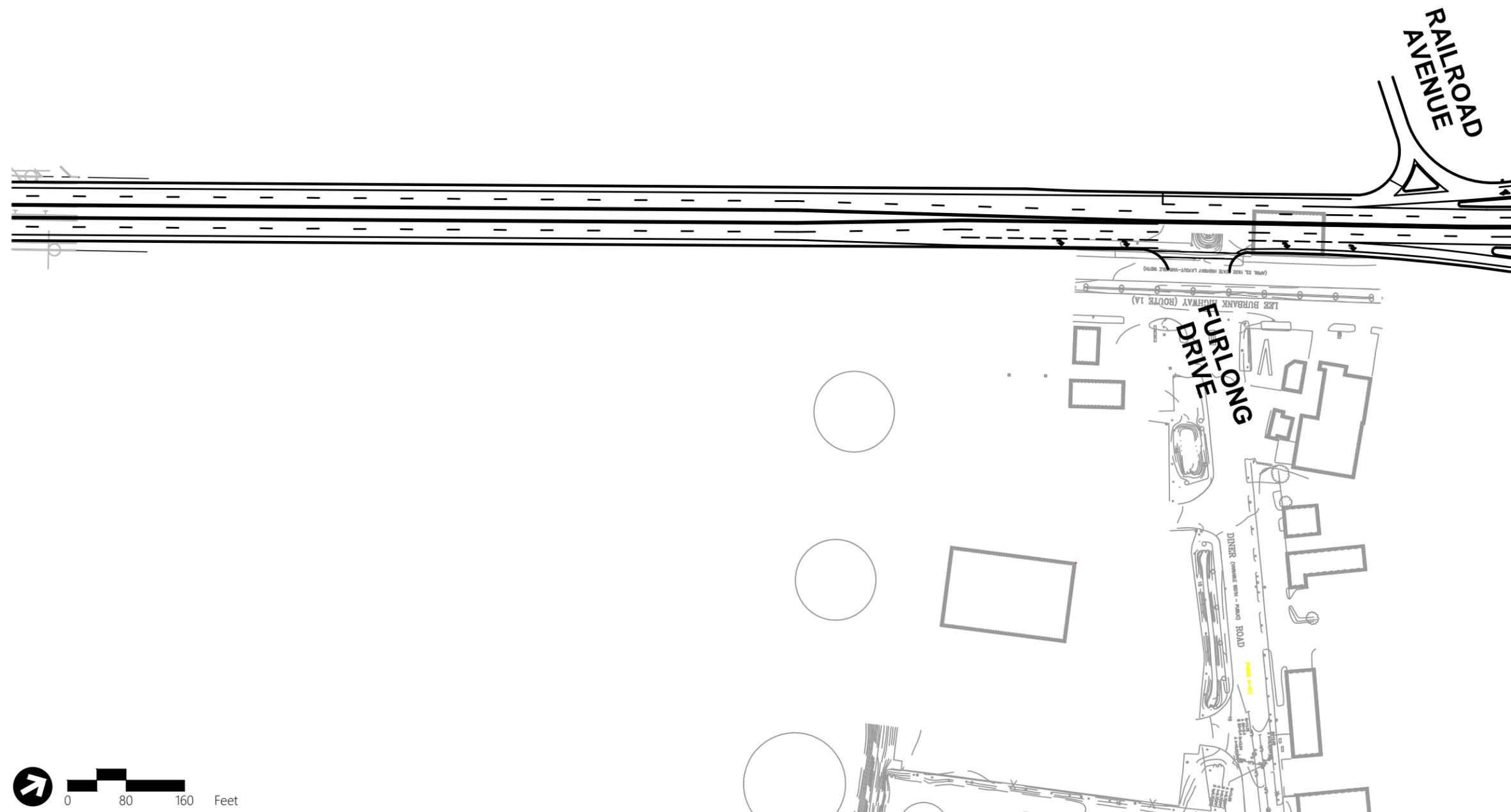


Figure 7c
Anticipated Conceptual Roadway Improvement
Super Street Option
Route 1 at Furlong Drive

Appendix A

BPDA Request for Additional Information

MEMORANDUM

TO: Michael Sinatra, Project Manager
FROM: BPDA /BTD Transportation Planning Staff
DATE: August 22, 2019
SUBJECT: Suffolk Downs Request for Supplemental Information Comments

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

Draft Master Plan PDA Documents

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

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

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

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

- Connection to Walley Street

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

May 1, 2019 Supplemental Information Document

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

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

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

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

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

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

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

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

BOSTON PLANNING & DEVELOPMENT AGENCY

**REQUEST FOR
SUFFOLK DOWNS REDEVELOPMENT PROJECT**

**SUBMISSION REQUIREMENTS
FOR ADDITIONAL INFORMATION REQUEST**

PROPOSED PROJECT: SUFFOLK DOWNS

PROJECT SITE: 525 MCCLELLAN HIGHWAY
EAST BOSTON, MA 02128

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

DATE: AUGUST 22, 2019

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

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

I. PROJECT DESCRIPTION

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

II. PREAMBLE

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

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

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

III. STAFF COMMENTS

Structure of the PDA Master Plan document

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

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

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

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

Planning and Urban Design

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

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

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

Housing Affordability

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

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

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

Transportation and Mobility

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

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

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

Appendix B

Transportation Supporting Documentation

1. Update Entering and Exiting Trips from Generation
2. Confirm Parking Spaces for each Zone and Ratios
3. Confirm Location of Points on Internal Network and Access Distribution
4. Distribute Percentages of Zones through each Point (Will probably not equal 100%)
5. Trips are the sum of the product of percentage of parking spaces through each point.

Direction	Trips
Entering	2497
Exiting	1837
Total	4334

Zone	Parking Sp: Ratio	Entering	Exiting	Total	
1B	897	7%	169	124	292
2B	706	5%	133	98	230
3B	2397	18%	450	331	782
4B	2021	15%	380	279	659
5B	866	7%	163	120	282
1R	982	7%	184	136	320
2R	917	7%	172	127	299
3R	1852	14%	348	256	604
4R	2653	20%	498	367	865
Sum	13291	2497	1837	4334	

Access Percentage (Enter)					
Zone	Rt1A/Tom	Win/Tom	Furlong	Win/Main	Total
1B	75%	15%	0%	10%	100%
2B	75%	20%	0%	5%	100%
3B	70%	30%	0%	0%	100%
4B	70%	25%	0%	5%	100%
5B	100%		0%		100%
1R	10%	25%	10%	55%	100%
2R	20%	15%	0%	65%	100%
3R	10%	70%	5%	15%	100%
4R		90%	10%		100%
	1057	1046	86	308	2497
	42%	42%	3%	12%	

Point (Enter)						
Zone	A	B	C	D	E	F
1B	15%	75%	25%	75%	50%	
2B	20%	75%	5%	75%	40%	10%
3B	30%	70%	0%	70%	0%	70%
4B	25%	70%	5%			5%
5B	0%	100%	0%	0%		
1R	25%	10%	55%	10%	20%	
2R	20%	20%	65%	20%	40%	
3R	70%	10%	15%	10%	20%	5%
4R	90%	0%				

Access Percentage (Exit)					
Zone	Rt1A/Tom	Win/Tom	Furlong	Win/Main	Total
1B	25%	45%	10%	20%	100%
2B	30%	45%	10%	15%	100%
3B	25%	50%	10%	15%	100%
4B	30%	50%	10%	10%	100%
5B	55%	45%	0%		100%
1R	15%		5%	80%	100%
2R	25%	15%	5%	55%	100%
3R	30%	50%	5%	15%	100%
4R	30%	60%	10%		100%
	532	826	146	334	1837
	29%	45%	8%	18%	

Point (Exit)						
Zone	A	B	C	D	E	F
1B	45%	25%	45%	25%	65%	
2B	45%	30%	15%	30%	45%	45%
3B	50%	25%	15%	25%	15%	25%
4B	50%	30%	10%			10%
5B	45%	55%	0%	0%		
1R	0%	15%	80%	15%	15%	
2R	25%	25%	55%	25%	25%	
3R	50%	30%	15%	30%	30%	30%
4R	70%	30%				

Entering Trips					
A	B	C	D	E	F
1055	1057	333	629	313	365
28%	28%	9%	17%	8%	10%

Exiting Trips					
A	B	C	D	E	F
875	532	365	272	303	116
36%	22%	15%	11%	12%	5%

1. Update Entering and Exiting Trips from Generation
2. Confirm Parking Spaces for each Zone and Ratios
3. Confirm Location of Points on Internal Network and Access Distribution
4. Distribute Percentages of Zones through each Point (Will probably not equal 100%)
5. Trips are the sum of the product of percentage of parking spaces through each point.

Direction	Trips
Entering	2258
Exiting	2793
Total	5051

Zone	Parking Sp: Ratio	Entering	Exiting	Total	
1B	897	7%	152	188	341
2B	706	5%	120	148	268
3B	2397	18%	407	504	911
4B	2021	15%	343	425	768
5B	866	7%	147	182	329
1R	982	7%	167	206	373
2R	917	7%	156	193	348
3R	1852	14%	315	389	704
4R	2653	20%	451	558	1008
Sum	13291	2258	2793	5051	

Access Percentage (Enter)					
Zone	Rt1A/Tom	Win/Tom	Furlong	Win/Main	Total
1B	50%	40%	0%	10%	100%
2B	50%	45%	0%	5%	100%
3B	45%	50%	0%	5%	100%
4B	40%	55%	0%	5%	100%
5B	70%	30%	0%		100%
1R	15%	30%	0%	55%	100%
2R	15%	20%	0%	65%	100%
3R	5%	80%	5%	10%	100%
4R		85%	0%	15%	100%
	624	1268	16	351	2258
	28%	56%	1%	16%	

Point (Enter)						
Zone	A	B	C	D	E	F
1B	40%	50%	50%	50%	50%	
2B	45%	50%	5%	50%	45%	45%
3B	50%	45%	5%	45%	5%	45%
4B	55%	40%	5%			5%
5B	30%	70%	0%	0%		
1R	30%	15%	55%	15%	15%	
2R	15%	15%	65%	15%	15%	
3R	80%	5%	10%	5%	5%	5%
4R	85%		0%			

Access Percentage (Exit)					
Zone	Rt1A/Tom	Win/Tom	Furlong	Win/Main	Total
1B	45%	35%	10%	10%	100%
2B	45%	35%	10%	10%	100%
3B	45%	35%	15%	5%	100%
4B	50%	35%	10%	5%	100%
5B	60%	35%	0%	5%	100%
1R	35%	5%	0%	60%	100%
2R	30%	15%	15%	40%	100%
3R	30%	50%	10%	10%	100%
4R	20%	55%	5%	20%	100%
	1058	1047	247	441	2793
	38%	37%	9%	16%	

Point (Exit)						
Zone	A	B	C	D	E	F
1B	35%	45%	45%	45%	45%	
2B	35%	45%	10%	45%	35%	35%
3B	35%	45%	5%	45%	5%	45%
4B	35%	50%	5%			5%
5B	35%	60%	5%	5%		
1R	5%	35%	60%	35%	35%	
2R	30%	30%	40%	30%	30%	
3R	50%	30%	10%	30%	30%	30%
4R	60%		20%			

Entering Trips					
A	B	C	D	E	F
1260	624	344	384	322	270
39%	19%	11%	12%	10%	8%

Exiting Trips					
A	B	C	D	E	F
1104	1058	395	634	511	417
27%	26%	10%	15%	12%	10%