July 22, 2019

L Street Station Redevelopment

776 Summer Street, Boston, MA 02127

Supplemental Information Document

SUBMITTED TO

Boston Planning and Development Agency

PROPONENTS

HRP 776 Summer Street LLC

Hilco Redevelopment Partners LLC and Redgate Capital Partners LLC

PREPARED BY

vhb

99 High St.
Boston MA 02110

IN ASSOCIATION WITH

Stantec Architecture
Stoss Landscape Urbanism
Greenberg Consultants
WSP
MacRostie Historic Advisors
DLA Piper
Green Ladder Environmental
Bruner/Cott & Associates
InkHouse LLC

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July 22, 2019

Brian Golden, Director

Boston Planning and Development Agency
One City Hall Square
Boston, MA 02201

Re: **L Street Station Redevelopment Project**
Boston, MA

Dear Director Golden:

HRP 776 Summer Street, LLC, (the "Proponent"), is pleased to submit the enclosed Supplemental Information Document ("SID") to the Boston Planning & Development Agency ("BPDA") for the construction of the L Street Station Redevelopment Project (the "Project") in the South Boston neighborhood of Boston, Massachusetts. This SID is being submitted pursuant to Article 80 of the Boston Zoning Code (the "Code") in response to your Request for Supplemental Information ("RSI") issued on December 27, 2018 on the Draft Project Impact Report, which was filed with the BPDA on August 16, 2018.

The Project includes the redevelopment of a 15-acre site along the Reserved Channel at 776 Summer Street on land formerly occupied by the Boston Edison L Street Power Station (the "Project Site"). The Project aims to bring a 1.78 million gross square feet of vibrant mixed use, transit-oriented development to the previously inaccessible historic site that celebrates its industrial past and expands the South Boston neighborhood.

As described in this SID, the Project has progressed in several key ways since the DEIR/DPIR, including a reduction in the overall scale of the Project by 150,000 gross square feet and a rebalancing of the mix of uses with a focus on commercial uses that are compatible with Conley Terminal. The Project continues to be consistent with the following eight guiding principles which were developed on cooperation with the City at the outset of the Project:

- Decommission and clean up this heavily industrial Project Site so that it is clean, healthy and safe;
- Remove the walls and fences surrounding the Project Site, and create connections into and through the Site, so that it is accessible and inviting to the South Boston neighborhood, all the way down to the water's edge;
- Convert the Project Site to a live/work/play mix of uses that fit with the neighborhood;
- Preserve and protect the continuing operation of an active, thriving Conley Terminal;
- Include retail and other uses, and significant public spaces, that will be used by the neighborhood;

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- Preserve some significant building elements to give the Site character and a sense of history;
- Minimize the use of cars by providing better alternatives (buses, shuttles, ridesharing services, biking, walking, etc.); and
- Make the Site green, sustainable and resilient.

The Project design has been shaped by a robust community engagement process and guided by hundreds of comments and recommendations by South Boston neighbors. It will bring new energy to the previously inaccessible site by providing a vibrant mix of uses, new public amenities, new "Arts and Industry" space for local artists, artisans, and makers, and flexible outdoor public open spaces. It will function to integrate and connect the South Boston neighborhood, serving as a transition point between the industrial uses to the north and east, and the residential areas to the south.

We look forward to working with you and your staff in your reviewing of the Project. The Proponent will publish notice of submission of the SID and will provide for an approximately 60-day public comment period. Requests for copies of the SID should be directed to Sarah Black at (617) 607-6120 or via email at sblack@vhb.com.

Sincerely,

Ralph Cox
Principal, Redgate Capital Partners

Cc: Tim Czerwienski, BPDA

L Street Station Redevelopment

Boston, Massachusetts

SUBMITTED TO **Boston Redevelopment Authority, d/b/a Boston Planning and Development Agency**
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Table of Contents

1 Project Overview and Supplemental Information 1-1

1.1 Continued Consistency with Guiding Principles 1-2
1.2 Project Change Summary 1-2
1.2.1 Transportation and Transit Mitigation 1-4
1.2.2 Project Phasing 1-6
1.3 Local Zoning and Regulatory Controls (PDA) 1-7
1.4 Anticipated Permits/Approvals 1-8
1.5 Supplemental Analysis of Project Alternatives 1-10
1.5.1 Commercial Alternative Trip Generation 1-11
1.5.2 Commercial Alternative Vehicle Parking 1-13
1.5.3 Commercial Alternative Transit Analysis 1-13

2 Transportation 2-1

2.1 Updated Trip Generation 2-2
2.1.1 2030 Full Build Condition Intersection Operational Analysis 2-3
2.1.2 2030 Full Build Mitigation 2-4
2.1.3 Traffic Signal Warrants 2-5
2.1.4 Loading, Service and Deliveries 2-6
2.2 Vehicle Parking 2-6
2.2.1 Project Vehicle Parking Supply 2-6
2.2.2 Project Parking Demand 2-7
2.2.3 Parking Management Strategy 2-9
2.2.4 Electric Vehicle Charging Stations 2-9
2.3 Transit Analysis 2-9
2.3.1 Existing Public Transit 2-9
2.3.2 Public Transit Existing Conditions: Bus Crowding Analysis 2-11
2.3.3 Public Transit Future Conditions: Bus Crowding Analysis 2-13
2.4 Bicycle Analysis 2-18
2.4.1 Bicycle Conditions 2-18
2.4.2 Shared Bicycle Stations 2-18
2.4.3 Project Bicycle Parking 2-18
2.4.4 Future Bicycle Infrastructure 2-19
2.4.5 Bicycle Level of Comfort Analysis 2-20
2.5 Future Pedestrian Facilities / Infrastructure 2-21
2.6 Transportation Mitigation Measures 2-21
2.6.1 Phasing of Proposed Physical and Operational Improvements 2-21
2.6.2 Transportation Demand Management (TDM) 2-24
2.6.3 Monitoring Program 2-24
2.7 Transportation Access Plan Agreement (TAPA) 2-25

3 Response to DPIR Comments....3-1

3.1 BPDA Request for Supplemental Information (RSI)....3-3
3.2 Responses to City Agency Comments....3-5
Letter 1: Boston Transportation Department and BPDA Transportation Planning Staff....3-5
Letter 2: BPDA Planning and Urban Design....3-21
Letter 3: BPDA Environment & Climate Change Planning....3-26
Letter 4: BPDA Smart Utilities....3-30
Letter 5: Boston Parks and Recreation Department....3-34
Letter 6: Boston Public Works Department....3-40
3.3 Elected Official Comments....3-44
Letter 7: Stephen F. Lynch....3-44
Letter 8: Nick Collins....3-48
3.4 IAG Comments....3-49
Letter 9: Jim Coveno....3-49
Letter 10: Anna White....3-54
Letter 11: Eileen Smith....3-55
Letter 12: J.F. Bennett....3-59
3.5 Community Group Comments....3-67
Letter 13: Gavin Foundation, Inc.....3-67
Letter 14: South Boston Arts Association....3-68
Letter 15: South Boston Open Space and Gate of Heaven Neighborhood Association....3-69
Letter 16: South Boston Neighborhood Development Corporation....3-71
Letter 17: Power House Company / BSC Group....3-71
Letter 18: Boston Harbor Now....3-75
3.6 Public Comments....3-78

List of Tables

Table No.	Description	Page
1-1	Proposed Development Program Summary	1-3
1-2	Anticipated Project Permits and Approvals	1-8
1-3	Commercial Alternative Development Program	1-10
1-4	Commercial Alternative Development by Block	1-10
1-5	Project Generated Trips for Commercial Alternative	1-11
1-6	2030 Commercial Alternative Build Analysis Signalized Intersection Vehicle LOS	1-12
1-7	2030 Commercial Alternative Build Analysis Unsignalized Intersection Vehicle LOS	1-12
1-8	Project Parking Supply	1-13
1-9	Commercial Alternative Route Level Summary of Passenger Crowding	1-17
1-10	Commercial Alternative vs. Proposed Program Summary of Bus Passenger Crowding	1-18
2-1	Project Generated Trips for 2030 Full Build Condition	2-2
2-2	2030 Build Conditions Signalized Intersection Vehicle LOS Morning and Evening Peak Hours	2-3
2-3	2030 Build Conditions Unsignalized Intersection Vehicle LOS Morning and Evening Peak Hours	2-3
2-4	2030 Full Build Mitigated Condition Intersection LOS Morning and Evening Peak Hour	2-5
2-5	Warrant Analysis Summary for East 1st Street at M Street	2-5
2-6	Project Parking Summary	2-6
2-7	Unshared Project Parking Demand based on Other Projects	2-8
2-8	ULI Parking Generation Estimate	2-8
2-9	MBTA Bus Services in the Study Area	2-10
2-10	Route Level Summary of Passenger Comfort and Crowding (Existing/Baseline)	2-12

2-11 Transit Trip Distribution Among Study Area Bus Routes (Future Condition) 2-14
2-12 Route Level Summary of Passenger Crowding 2-17
2-13 Bicycle Parking Summary 2-19
2-14 Bicycle Level of Comfort Analysis 2-20
2-15 Phasing of Potential Transportation Mitigation 2-23

List of Figures

Figure No.	Description
1.1	Site Locus Map
1.2	Project Site Context
1.3	Existing Conditions
1.4	Previously Reviewed Site Plan
1.5	Proposed Site Plan
1.6	Conceptual Landscape Plan
1.7a	Project Renderings – Turbine Hall 1: Looking South
1.7b	Project Renderings – Turbine Hall 1: Looking North
1.7c	Project Renderings – Turbine Hall 2: Looking North
1.7d	Project Renderings – Turbine Hall 2: Looking South
1.7e	Project Renderings – 1898 Building
1.8a	Floor Plan – Ground Level Plan
1.8b	Floor Plan – 3rd Level Plan
1.9a	Project Perspectives – E. 1st Street
1.9b	Project Perspectives – E. 1st Street
1.9c	Project Perspectives – M. Street
1.9d	Project Perspectives – Summer Street/ E. 1st Street
1.9e	Project Perspectives – E. 1st Street
1.9f	Project Perspectives – Elkins Street/ Summer Street
1.10	Massing
1.11a	Street Section – A to M Street
1.11b	Street Section – E-F at M Street
1.11c	Street Section – Elkins Street
1.11d	Street Section – Turbine Hall at Elkins Street
1.11e	Street Section – D at Elkins/Summer Street
1.11f	Street Section – A at East First Street
1.11g	Street Section – B at East First Street
1.11h	Street Section – Turbine 3 at East First Street
1.11i	Street Section – C at East First Street
1.12a	Phasing Plans – Demolition (2019)
1.12b	Phasing Plans – 1a (2020-2022)
1.12c	Phasing Plans – 1b (2021-2023)
1.12d	Phasing Plans – 1c (2022-2024)
1.12e	Phasing Plans – 2 (2024-2030)
1.13	All Commercial Alternative
1.14a	Commercial Alternative Trips – AM Peak Hour

1.14b Commercial Alternative Trips – PM Peak Hour
1.15a 2030 Overall Intersection LOS Results – AM Peak Hour
1.15b 2030 Overall Intersection LOS Results – PM Peak Hour

2.1 Study Area Intersections
2.2a 2030 Project-Generated Trips – AM Peak Hour
2.2b 2030 Project-Generated Trips – PM Peak Hour
2.3a 2030 Build Condition Traffic Volumes – AM Peak Hour
2.3b 2030 Build Condition Traffic Volumes – PM Peak Hour
2.4 Intersection/Signal Improvement Locations
2.5 Public Transportation
2.6 Bike/Pedestrian Connectivity

3.1a Public Open Space Plan
3.1b Public Open Space Diagram
3.2 LEED Scorecard
3.3a Conceptual Cross Section (M Street Extension)
3.3b Conceptual Cross Section (Elkins Street Extension)
3.4 Conceptual Green Infrastructure

1

Project Overview and Supplemental Information

In accordance with Article 80B of the City of Boston Zoning Code (the "Code"), HRP 776 Summer, LLC (the "Proponent"), respectfully submits this Supplemental Information Document ("SID") to the Boston Planning and Development Agency ("BPDA"). This SID is in response to the BPDA's Request for Supplemental Information ("RSI") dated December 27, 2018 on the Draft Project Impact Report ("DPIR") filed August 16, 2018, for the L Street Station Redevelopment (the "Project") along the Reserved Channel in South Boston (the "Project Site"). Refer to Figure 1.1 for a site locus map and Figure 1.2 for the project context. Existing site conditions are shown on Figure 1.3.

The Project proposes the construction of a vibrant mixed-use, transit-oriented development, that celebrates the industrial past of the former Boston Edison L Street Power Station ("Power Station") through the adaptive reuse of some of its most historically significant buildings including the grand Turbine Halls, the 1898 Building, and the small entrance Administration Building along Summer Street. The Project will bring new energy to the previously inaccessible site with approximately 1.78 million gross square feet[1] of mixed-use redevelopment with a vibrant pedestrian environment connected in character and spirit to the industrial nature of the district, as well as inviting innovation and artful design through the development of a mix of residential and commercial buildings.

As described below in Section 1.2, *Project Change Summary*, the Proponent has worked collaboratively with key community stakeholders since the DPIR filing to re-balance the mix of uses at the Project Site. The Project now contains 60 percent commercial use, including the conversion of two buildings near Conley Terminal from residential to commercial use. The shift in use combined with an overall program reduction of approximately 150,000 square feet reduces the number of proposed housing units by almost half (44%).

This chapter provides an overview of the proposed redevelopment, and project review history and background. It also describes the key elements of the Project, including a summary of changes that have occurred since the DPIR filing, as well as a supplemental analysis of an all commercial Project alternative. Chapter 2, *Transportation*, provides supplemental information on the project's transportation-

1 Exclusive of structured parking areas, consistent with the Code.

related impacts and associated mitigation. Chapter 3, *Response to Comments*, contains direct responses to comments received on the DPIR filing.

1.1 Continued Consistency with Guiding Principles

Since the acquisition of the Property, the City and Proponent have worked cooperatively to ensure that the Project would be planned and designed to be consistent with the goals of area planning guidelines, including driving inclusive economic growth and new housing opportunities, improving the quality of life in the surrounding South Boston Neighborhood, and creating a vibrant, publicly accessible waterfront destination.

In response to these area planning goals, and to ensure that these goals were met as the Project advanced, the Proponent established eight guiding principles for the Project:

- Decommission and clean up this heavily industrial Project Site so that it is clean, healthy and safe;
- Remove the walls and fences surrounding the Project Site, and create connections into and through the Site, so that it is accessible and inviting to the South Boston neighborhood, all the way down to the water's edge;
- Convert the Project Site to a live/work/play mix of uses that fit with the neighborhood;
- Preserve and protect the continuing operation of an active, thriving Conley Terminal;
- Include retail and other uses, and significant public spaces, that will be used by the neighborhood;
- Preserve some significant building elements to give the Site character and a sense of history;
- Minimize the use of cars by providing better alternatives (buses, shuttles, ridesharing services, biking, walking, etc.); and
- Make the Site green, sustainable and resilient.

The revised Project design continues to be consistent with these principles. While significant changes have been made since the initial ENF/PNF filing in response to specific community concerns, the overall intent and approach for the Project has been preserved. The Project will rejuvenate an abandoned site and re-integrate 15 acres of former industrial land into a thriving extension of the South Boston neighborhood.

1.2 Project Change Summary

As now proposed, the Project re-balances the mix of uses at the Project Site with a focus on commercial uses that are compatible with Conley Terminal and a variety of job creation opportunities for neighborhood residents. The number of proposed housing units is reduced by almost half (44%), and the overall scale of the Project is reduced by 150,000 gross square feet.

The Project now contains 60 percent commercial uses, including the conversion of two buildings near Conley Terminal operations from residential to commercial use. The largest proposed commercial use is now R&D/Lab space, a use which has been shown to be highly compatible with continued marine industrial use in properties such as the Innovation and Design Building (21 Drydock Ave) and ISQ (6 Tide Street). Other proposed commercial uses for the site, including hotel and neighborhood retail uses, provide strong support for the continued growth and success of the Flynn Cruiseport, another key element of Boston's working port.

The updated development program is summarized in Table 1-1. Refer to Figure 1.4 and 1.5 for the previously reviewed site plan and proposed site plan, respectively. An updated conceptual landscape plan is provided in Figure 1.6. Updated renderings are included as Figure 1.7a-e. Ground floor and typical third floor plans are included as Figures 1.8a and 1.8b, and updated Project view perspectives are provided as Figures 1.9a-f.

Table 1-1 Proposed Development Program Summary

Project Element	DEIR/DPIR Program	Proposed Program[1]
Residential	1,303,750 SF (1,344 units)	712,600 SF (750 units)
Office	368,070 SF	470,000 SF
R&D	—	330,000 SF
Hotel	172,000 SF (344 keys)	172,200 SF (344 keys)
Retail	85,630 SF	81,200 SF
Civic/Cultural	—	14,000 SF
Parking	Up to 1,397 spaces	Up to 1,214 spaces
Total	**1,929,450 SF**	**1,780,000 SF**

1 All areas provided as gross square feet (GSF) exclusive of structured parking, as defined in the Code
sf = square feet

As summarized in Section 1.2.2 below, and further described in Chapter 2, *Transportation*, the Project now commits to a series of traffic and transit improvements targeted at two issues of priority community concern: improving the frequency and reliability of MBTA bus service and increasing pedestrian safety within the neighborhood.

The Project also addresses community concerns about parking, especially residential parking, by providing an increased residential parking ratio on-site of one space per unit. The Project will provide 120 parking spaces to neighborhood residents on nights and weekends at a discounted rate within the parking garages in the commercial buildings. The Project will also enter into an agreement with the City to waive resident parking stickers for apartment residents on the Site.

The Project takes further steps to ensure that it will knit into the fabric of the neighborhood along East 1st Street. As shown in Figure 1.10, the residential buildings along East 1st Street are reduced in height from seven stories to five. A new pedestrian connection is made on the east side of the Turbine Halls, adding to the options for neighboring residents to explore the Site's open spaces and access the

waterfront. As shown on the updated street sections in Figures 1.11a-i, the reconstruction of East 1st Street will now include wider sidewalks and street trees on both the north and south sides of the street. The Project will give priority consideration to local South Boston businesses within the retail spaces on the Site. No marijuana-related uses or businesses will be allowed.

The Project adds 26 affordable apartments targeted at middle-income residents (150 percent of AMI), raising the on-site affordability of the Project to 16 percent of all housing units.

The Project will fund a Licensed Site Professional ("LSP"), representing the neighborhood, to review the Project's soil and groundwater environmental remediation plans.

1.2.1 Transportation and Transit Mitigation

The Proponent has been meeting regularly with transportation and planning staff from the City of Boston, BTD, MassDOT, MBTA and Massport regarding the analysis and mitigation of transportation and transit impacts. As a result of these discussions and community input, the following transportation and transit mitigation revisions are being considered:

- **Site Access Improvement –** Creation of a new four-leg intersection with new traffic signals at Summer Street at Elkins Street Extension. The intersection will accommodate adaptive signalization, connectivity, transit priority and more efficient pedestrian walk time distribution. ADA accessible ramps will be provided at all four corners in addition to crosswalks and bicycle appropriate striping.
- **Site Access Improvement –** Creation of a new four-leg intersection at East 1st Street and M Street Extension. The intersection will accommodate vehicles, bicyclists and pedestrians with ADA accessible ramps at all four corners; crosswalks and bicycle striping will also be included. The intersection will be enhanced with a Rectangular Rapid Flashing Beacon (RRFB) to alert drivers to slow down and enhance and improve safety at the crosswalks for pedestrians and bicyclists.
- **Site Access Improvement –** Creation of a new access point from the Project Site to Conley's Dedicated Freight Corridor, to be used for commercial/service truck access only which would limit truck activity on Summer Street and East 1st Street.
- **Site Circulation Improvement –** Construction of internal roadways in line with City standards that accommodate vehicles, bicyclists and pedestrians. The additional roadways will break up the parcel and provide more travel route opportunities for both Site users and the community and make it possible to access the waterfront.
- **Traffic / Ped / Bike Improvement –** Re-construction of Summer Street along the property boundary (between DFC and East 1st Street) to accommodate vehicles, on-street parking and active drop-off/pick-up curb space, separated bike lanes, a wide sidewalk with trees and upgraded bus stops.

- **Traffic / Ped / Bike Improvement –** Re-construction of East 1st Street along property boundary (between Summer Street and City Point western driveway) to accommodate vehicles, on-street parking and bike lanes, where possible. In addition, the reconstruction will include widening of the southern (non-Project side) sidewalk from Summer Street/L Street to Acadia Street, to improve safety and enhance pedestrian experience for Site users and neighbors.
- **Traffic / Ped / Bike Improvement –** Upgrade of traffic signal equipment at the intersection of Summer Street and East 1st Street to accommodate adaptive signalization, connectivity, transit priority and more efficient pedestrian walk time distribution.
- **Neighborhood Traffic Improvement –** Re-striping of East Broadway (between L Street and M Street) to add an additional travel lane in the westbound direction, while preserving on-street parking on both sides.
- **Neighborhood Traffic Improvement –** Upgrade of traffic signal equipment at the intersection of L Street and East Broadway to accommodate adaptive signalization, connectivity, transit priority and more efficient pedestrian walk time distribution.
- **Traffic Signal Connectivity (Vehicle and Transit Improvement) –** Enable adaptive signals capabilities, including transit signal priority and signal connectivity, to allow traffic signals to communicate with each other and/or communicate with the City of Boston Traffic Management Center, as required through the City's Smart Utilities Policy. Connectivity to be enabled along the Summer Street/L Street corridor between Drydock Avenue and East Broadway.
- **Project Transit Improvement –** Upgrade two bus stops within the Project Site to include shelters, fare vending machines and Mobility/MicroHubs with real-time transportation information screens.
- **Neighborhood Transit / Bus Stop Improvements –** Work with the MBTA to improve bus stops along the L Street/Summer Street corridor, beyond the Project Site, focused on improved frequency and reliability of service, including installation of new AFC 2.0 Fare Vending Machines. These improvements are in addition to the bus stop improvements at the two Site-specific stops.
- **Neighborhood Transit / City Point Improvements –** Work with the MBTA to design and implement improvements to increase the layover and passenger handling capacity of City Point Terminal.
- **Bicycle Facilities –** Installation of three BlueBike stations on-site in highly visible locations such as near bus stops and Mobility/MicroHubs (two proposed on Summer Street and one proposed on East 1st Street near City Point), with an option to install a fourth BlueBike station, if there is enough demand, to serve Project Site residents, employees, visitors and the wider community. Final station locations will be defined in coordination with City's BlueBike coordinator and will depend on availability of appropriate sun exposure, as stations are solar powered.
- **Neighborhood Safety Improvements –** Work with BTD to further the implementation of Vision Zero programs related to traffic calming and pedestrian safety improvements along the L Street corridor beyond the Project Site boundary, from East 1st Street to Day Boulevard, and along East 1st Street.

› **Commitment to On-Going Monitoring –** Implement a monitoring program that examines the traffic, transit and parking impacts of each Project Phase to the neighborhood, as it is built out. The intent of the monitoring program is to confirm that the post-development impacts of the Project are consistent with the forecast estimates and to ensure that the mitigation measures are completed and/or maintained. The monitoring program is expected to include employee and resident surveys, collection of traffic counts and parking garage counts and occupancies. The implementation of the proposed mitigation measures, TDM measures, parking accommodations, and on-site amenities will also be verified.

1.2.2 Project Phasing

The Project will be developed in multiple phases spanning an approximately 10 to 15-year period, with demolition commencement anticipated in late 2019. As summarized in the DEIR/DPIR, the strategic phasing of the Project allows for the development to gradually grow and become part of the fabric of the neighborhood, and limits construction activity to individual blocks, reducing noise, disturbance, and other construction impacts. The phasing plan also creates an opportunity for the Project to provide overflow parking opportunities for the community.

The five key phases of the Project are anticipated to be as follows. Detailed phasing diagrams are provided in Figures 1.12a-e:

› Demolition Phase: 2019 (Figure 1.12a)

During the demolition phase, the structures and buildings that are not being preserved will be dismantled and removed from the site. Environmental conditions on the Project Site will be addressed through this phase to prepare the site for future uses and interim activation. Impacts associated with demolition, including noise, dust, air quality, pedestrian access, and vibration, will be closely monitored and controlled as the existing structures to be demolished are carefully cleared from the site, and soils are stabilized.

› Phase 1A: 2020 – 2022 (Figure 1.12b)

After the completion of the site demolition and remediation, Phase 1A, will prioritize construction of low-rise residential along East 1st Street and the renovation of Turbine Hall 3 on East 1st Street into office. The remaining two Turbine Halls will be renovated to an interim condition for public events and activities. The scale and use mix of this initial development phase is the first step to linking the Project Site to the neighborhood and creating an active edge along East 1st Street. East 1st Street will be reconstructed from the intersection of Summer Street to the western Site boundary, and streetscape improvements like wider sidewalks and street trees will be made along the portions of East 1st Street to Acadia Street.

› Phase 1B: 2021 – 2023 (Figure 1.12c)

Phase 1B will activate the Project Site through considerable upgrades to the public realm, including construction of the extension of M Street to the waterfront

overlook and interim improvements along the waterfront including a harborwalk for public access. These critical public realm improvements, combined with the activity generated through the buildout during this phase of R&D/Lab space in Blocks H and F, will create a lively waterfront destination for the South Boston Neighborhood. The waterfront overlook at the terminus of M Street could support food trucks or other pop up food/retail opportunities and provides fantastic views across the Reserved Channel and back toward the City.

› Phase 1C: 2022-2024 (Figure 1.12d)

Phase 1C is comprised of the construction of the hotel and residential uses in Block E as well as the complete renovation of the 1898 Building as office space. This phase will also include a pedestrian connection between the buildings increasing the accessibility to the waterfront from East 1st Street and provides additional public realm improvements along Elkins Street.

› Phase 2: 2024 – 2030 (Figure 1.12e)

Phase 2 involves the majority of the work along Summer Street, including the proposed improvements to Summer Street and the development of Blocks C and D, which will include a mix of residential and hotel uses. During this phase the waterfront open space will be developed into its final condition. Phase 2 will also complete the renovation of the historic Turbine Halls for retail and civic/cultural uses and the Administration Building which will contain cultural spaces for the community. Blocks C and D will contain ground floor retail that will be neighborhood oriented and create an activated pedestrian alley that provides a direct connection from East 1st Street all the way down to the water.

1.3 Local Zoning and Regulatory Controls (PDA)

The Project Site is located within the South Boston Marine Economy Reserve Subdistrict of the Harborpark Dorchester Bay/Neponset River Waterfront District, which is governed by Article 42A of the Code and shown on Zoning Map 4B/4C. Given a number of factors, particularly the size of the Project Site, the scale and complexity of the Project, and the proposed mix of uses, the Proponent intends to pursue approval of a Planned Development Area ("PDA") pursuant to Article 3-1A and Section 80C of the Code. Once approved, the PDA will set forth the relevant use, dimensional and other requirements applicable to the overall development of the Project in full compliance with the Code, including any relief which may be required from any of the above-referenced zoning districts. The overall Project is anticipated to be subject to a Master Plan PDA with individual phases of the Project subject to one or more PDA Development Plans. The PDA Development Plans will provide more specific information about the various phases of the Project and will detail procedures for ongoing design and development review and approval by the BPDA. The initial application for the Master Plan PDA is anticipated to be submitted concurrent with this SID filing subject to final coordination with the BPDA.

1.4 Anticipated Permits/Approvals

Table 1-2 below presents a preliminary list of permits and approvals from local, state, and federal governmental agencies, which may be required for the Project. It is possible that not all permits or actions listed will be required, or that additional permits or actions may be needed, based on determinations during Project design and development.

Table 1-2 Anticipated Project Permits and Approvals*

Agency/Department	Permit/Approval/Action
Federal	
Federal Aviation Administration	Determination of no hazard to air navigation (buildings and cranes), as necessary
Environmental Protection Agency	National Pollutant Discharge Elimination System ("NPDES")
	NPDES Construction General Permit
	NPDES Dewatering General Permit
	NPDES Remediation General Permit
	Stormwater Pollution Prevention Plan Preparation
Army Corps of Engineers	Section 10 / Section 404 Permit(s) (*if required*)
Commonwealth of Massachusetts	
Executive Office of Energy and Environmental Affairs	Massachusetts Environmental Policy Act Review
	Public Benefits Determination
Massachusetts Historical Commission	State Register Review
	Memorandum of Understanding ("MOU") (*if required*)
Massachusetts Office of Coastal Zone Management	Federal Consistency Review
Massachusetts Port Authority	Abutter Agreements
Massachusetts Department of Environmental Protection	Chapter 91 License
	Permit for discharge to groundwater (*if required*)
	Filings/approvals for remediation of hazardous materials
	Water Quality Certification (*if required*)
	Sewer Connection Permit (*if required*)
	Water/Sewer Cross Connection Permit (*if required*)
	Clean Air Act Permit(s) (*if required*)
Architectural Access Board	Regulation Variances (M.G.L. c.22, §13A; 521 CMR 3.00 *et. seq*.) (*if required*)
Massachusetts Water Resources Authority	Permit for Construction Dewatering *(if required)*
	Sewer Discharge Permit (*if required*)

Table 1-2 Anticipated Project Permits and Approvals (Continued)*

Agency/Department	Permit/Approval/Action
City of Boston	
Boston Planning and Development Agency	Article 80B Large Project Review
	Article 80B-8 Disclosure of Beneficial Interests
	Article 80C Review – PDA Development Plan Approval
	Article 85 Demolition Day
	Conditional Use Permit (Restricted Parking Overlay District)
	BPDA Cooperation Agreement
	Development Impact Project ("DIP") Agreement
	Affordable Housing Agreement
	Boston Resident Construction Employment Plans
	City of Boston Jobs MOU
	First Source Agreement
Boston Interagency Green Building Committee	Article 37 Green Building Compliance
Boston Civic Design Commission	Design Review
Public Improvement Commission	Licenses for earth retention, groundwater observation wells and street and sidewalk improvements, as necessary
Boston Conservation Commission	Order of Conditions
Boston Water & Sewer Commission	Site Plan Approval
Boston Transportation Department	Transportation Access Plan Agreement
	Construction Management Plan
Committee on Licenses, Public Safety Commission	Garage Permit and Fuel Storage License
Air Pollution Control Commission	Modified Parking Permit under South Boston Parking Freeze (*if required*)
Inspectional Services Department	Building Permit
	Certificate of Occupancy
Boston Parks Department	Permission required for erection or alteration of buildings or structures within 100 feet of Christopher Lee Playground/Medal of Honor Park (*if required*)

* This is a preliminary list of local, state and federal permits and approvals that may be sought for the Project. This list is based on current information about the Project and is subject to change as the design of the Project evolves.

1.5 Supplemental Analysis of Project Alternatives

This section presents supplemental analysis of the transportation, parking, and transit impacts of an all-commercial alternative for the Project (the "Commercial Alternative"), as requested during the public review period on the DEIR/DPIR. The Commercial Alternative, as shown in Table 1-3 and 1-4, would replace the proposed residential portion of the development with a mix of office, research and development ("R&D"), hotel, and retail land uses totaling approximately 1.78 million gross square feet. The Commercial Alternative is shown on Figure 1.13.

Table 1-3 – Commercial Alternative Development Program

Project Element	Commercial Alternative Program
Residential	0
Office	852,000 SF
R&D	614,000 SF
Hotel	236,000 SF (474 keys)
Retail	64,000 SF
Civic/Cultural	14,000 SF
Total	**1,780,000 SF**

Table 1-4 – Commercial Alternative Development by Block

Project Element	Approx. Building Heights (Feet)	Primary Use
Block A	96	R&D
Block B	66	Office
Block C	206	Office
Block D	109.5	Office
Block E	201	Hotel
Block F	137	R&D
Block G	57	Office
Block H	173.5	R&D
T1, T2, Admin	57	Civic/Cultural
T3	73.5	Office

The Commercial Alternative would have many of the same overall site features proposed by the Project, including new neighborhood-oriented retail opportunities, publicly accessible open spaces, and the preservation of the Turbine Halls. As described in greater detail in the transportation impact summary below, although level of service is anticipated to degrade at certain intersections within the study area during the peak hour, the Commercial Alternative is anticipated to result in less crowding on the Route 7 bus. The Commercial Alternative would also result in some design modifications to accommodate the change of use, including redesign of the previously proposed residential buildings along East First Street.

1.5.1 Commercial Alternative Trip Generation

While the development and construction of the full program is expected to take approximately 10 to 15 years, for the purposes of the alternative analysis, a conservative approach was assumed which assumes full buildout by the year 2030. Resulting alternative trip generation estimates are presented in Table 1-5 below.

The Commercial Alternative is expected to generate approximately 578 vehicle trips during the morning peak hour and 644 vehicle trips during the evening peak hour. These trips are also shown graphically in Figures 1.14a and 1.14b.[2]

Table 1-5 Project Generated Trips for Commercial Alternative

	Vehicle			Transit			Walk/Bike/Other		
	In	**Out**	**Total**	**In**	**Out**	**Total**	**In**	**Out**	**Total**
AM Peak Hour									
Retail	8	5	13	28	18	46	28	18	46
Hotel	38	26	64	78	54	132	49	33	82
Office	368	60	428	462	75	537	277	45	322
R&D	55	18	73	69	23	92	41	14	55
Total Trips (Commercial Alternative)	**469**	**109**	**578**	**637**	**170**	**807**	**395**	**110**	**505**
Total Trips (Proposed Project)	***228***	***122***	***350***	***331***	***190***	***521***	***208***	***118***	***326***
PM Peak Hour									
Retail	25	27	52	88	96	184	88	96	184
Hotel	42	40	82	86	82	168	54	51	105
Office	68	356	424	85	447	532	51	268	319
R&D	13	73	86	16	91	107	10	55	65
Total Trips (Commercial Alternative)	**148**	**496**	**644**	**275**	**716**	**991**	**203**	**470**	**673**
Total Trips (Proposed Project)	***138***	***272***	***410***	***266***	***428***	***694***	***194***	***289***	***483***

[2] Trip generation and associated level of service and transit impact analyses was evaluated based on a prior version of the Commercial Alternative program, however the slight difference in program is insignificant for the purposes of evaluating traffic impacts.

1.5.1.1 Commercial Alternative Intersection Operational Analysis

Intersection capacity analyses were conducted for the 2030 Full Build Condition morning and evening peak hours and are presented in Table 1-6 for signalized intersections and Table 1-7 for unsignalized intersections. Figures 1.15a and 1.15b show the level of service comparison of the build condition with the Commercial Alternative and the proposed program. The additional trips in both the morning and evening peak hours will cause more intersections to degrade in level of service and may require additional mitigation.

Table 1-6 2030 Commercial Alternative Build Analysis Signalized Intersection Vehicle LOS

		Commercial Alternative		Proposed Project	
Node/Intersection		AM Peak	PM Peak	AM Peak	PM Peak
1.	Summer Street at Drydock Ave/Pappas Way	LOS F	LOS F	LOS F	LOS F
2.	Summer Street at DFC	LOS B	LOS A	LOS B	LOS A
4.	Summer Street/L Street at East 1st Street	LOS F	LOS F	LOS F*	LOS F*
7.	L Street at East Broadway	LOS E	LOS F	LOS E*	LOS F*
11.	L Street at East 5th Street	LOS E	LOS D	LOS D	LOS D
12.	L Street at East 8th Street	LOS B	LOS B	LOS B	LOS B
14.	L Street at William J. Day Boulevard	LOS A	LOS A	LOS A	LOS A

Note: Intersection numbers correspond to numbering shown on Figure 2.1.
* Indicates that mitigation is proposed at this location

Table 1-7 2030 Commercial Alternative Build Analysis Unsignalized Intersection Vehicle LOS

		Commercial Alternative		Proposed Project	
Node/Intersection	Approach	AM Peak	PM Peak	AM Peak	PM Peak
3. Summer Street at Elkins Street	Elkins Street Eastbound	LOS F	LOS F	LOS F*	LOS F*
	Site Driveway Westbound	LOS F	LOS C	LOS F*	LOS C*
5. L Street at East 2nd Street	East 2nd Street Eastbound	LOS C	LOS D	LOS C	LOS D
	East 2nd Street Westbound	LOS C	LOS D	LOS C	LOS C
6. L Street at East 3rd Street	East 3rd Street Eastbound	LOS C	LOS E	LOS C	LOS D
	East 3rd Street Westbound	LOS C	LOS C	LOS C	LOS C
8. East 1st Street at K Street	K Street Northbound	LOS D	LOS C	LOS D	LOS C
	K Street Southbound	LOS B	LOS B	LOS B	LOS B
9. East 1st Street at M Street	M Street Northbound	LOS D	LOS D	LOS D	LOS C
	Site Driveway Southbound	LOS B	LOS B	LOS B	LOS B
10. East 1st Street at West 1st Street/Pappas Way	West 1st Street Northbound	LOS F	LOS D	LOS F	LOS C
	Pappas Way Southbound	LOS F	LOS F	LOS F	LOS F
13. L Street at Columbia Road	Columbia Road Eastbound	LOS C	LOS D	LOS B	LOS D
	Columbia Road Westbound	LOS C	LOS C	LOS C	LOS C

Note: Intersection numbers correspond to numbering shown on Figure 2.1.
* Indicates that mitigation is proposed at this location

1.5.2 Commercial Alternative Vehicle Parking

With the all-commercial alternative in place, the proposed parking supply would total up to approximately 1,194 spaces. The parking is proposed to be allocated to the individual uses based on the ratios displayed in Table 1-8.

Table 1-8 Project Parking Supply

Land Use	Program	Parking Ratio	Parking Supply
Retail	64 ksf	0.4 per ksf	26
Hotel	474 keys	0.3 per key	142
Office	852 ksf	0.7 per ksf	596
R&D	614 ksf	0.7 per ksf	430
Total Spaces			**1,194 spaces**

1.5.3 Commercial Alternative Transit Analysis

To determine the potential impact of the Commercial Alternative on bus passenger crowding, the analysis consists of estimating bus passenger loads by weekday trip for the 2030 Commercial Alternative condition and compare it to the future 2030 No-Build condition as determined in Section 2.3.3, which are then compared against the MBTA's bus crowding threshold. The analysis assumes that all Commercial Alternative-generated trips will travel through the peak load point of the bus segment analysis: between the Project Site's bus stop and the previous (or next) rapid transit stop served by the bus, or else the start (or end) of bus trip.

This transit analysis for the Commercial Alternative focused on an assessment of MBTA Bus Routes 7, 9, 10, and 11. The MBTA Bus Route 5 was omitted from the study because the service will be discontinued beginning in the Fall 2019, as part of the Better Bus project service adjustments.

1.5.3.1 Commercial Alternative Project-Generated Transit Trips

The transit trips generated by the Commercial Alternative were estimated using the methodology outlined in the DEIR/DPIR, and the modal trip activity for the AM and PM peak hours were generated. The peak hour trips were then used to estimate the daily transit ridership using a factor based on the observed peak hour of passenger activity for each bus route. The daily transit trips are then distributed throughout the bus service period based on the actual passenger boarding distribution for the bus area's bus routes, to approximate trips to and from the Project Site, based on land use.

The bus crowding analysis was performed using two different assumptions for transit mode share:

1. expected project mode shares (ranging from 37 to 42 percent, depending on land use) for the peak hours, as presented in the DEIR/DPIR, and
2. an aspirational mode share reflecting the City of Boston's GoBoston 2030 goal to increase transit mode share; in this study area, that mode share is 49 percent, applied to the peak hours of trip generation.

The Commercial Alternative generated bus transit trips are distributed throughout the service day and added to each of the bus trip passenger loads under the No Build condition to determine the 2030 Commercial Build condition.

These daily transit trips were distributed and averaged to 30 minute time periods throughout the day based on the combined existing inbound and outbound bus trip passenger load distribution for each bus route. This intra-day distribution was used to reflect the transit demand the Commercial Alternative is anticipated to generate throughout the day compared to existing demand.

Projected transit ridership was assigned to each bus route and direction based on existing trip patterns during peak periods, as shown in Table 2-11 in Section 2.3.3). The Route 5 was not assigned new passenger demand because the service will be discontinued in the Fall 2019 (in the study area, the Route 10 provides more frequent service along the same route alignment).

1.5.3.2 Alternative Analysis Transit Results

Table 1-9 shows the side by side comparison of the transit analysis for the Commercial Alternative and the Proposed program. The first Commercial Alternative condition describes bus transit trip impacts assuming the share of transit users at the Project site follows the City of Boston's aspirational, higher mode share of transit users. The second condition describes bus transit trip impacts assuming the expected share of transit users around the Project Site.

As evident in the table, the Route 7 inbound would experience less crowding with a Commercial Alternative while the other bus routes and directions would operate at somewhat similar crowding conditions for both programs.

The Commercial Alternative results in new bus trips on each bus route that exceed the MBTA's policy for bus passenger loads. Overall, the removal of the residential component for the Commercial Alternative partially alleviates bus crowding on the Route 7 compared to the proposed Project program, and generates moderate changes to bus crowding on the other routes compared to the proposed Project program. The Route 10 under the Commercial Alternative would experience exceedances with a greater number of passengers over the comfort threshold compared to the proposed Project program (with the residential component); however, these exceedances occur only during the off-peak when service is less frequent.

The largest exceedances are on the Route 7 and the Route 9, and smaller exceedances are on the Route 10 and the Route 11. On the Route 7, Commercial Alternative build-conditions may result in up to 14 bus trips (depending on direction) with passenger crowding levels over the threshold, with an average of 3-5 passengers per bus experiencing the crowded condition. Over the day's service period, this results in up to approximately 85 passengers daily on buses with crowding levels over the comfort threshold on the Route 7.

On the Route 9, Commercial Alternative build conditions may result in 16-22 bus trips (by direction) with passenger crowding levels over the threshold, with an average of 6-7 passengers per bus experiencing the crowded condition. This results in approximately 203-290 passengers daily on buses over the comfort threshold on the Route 9 trips. On the Route 10, Commercial Alternative build-conditions may result in 1-4 bus trips (by direction) with passenger crowding levels over the threshold, with an average of 13 passengers per bus experiencing the crowded condition. This results in approximately 66-91 passengers daily on bus trips over the comfort threshold. These conditions occurred during the off-peak when bus service was infrequent yet passenger demand remained relatively high.

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Table 1-9 Commercial Alternative Route Level Summary of Passenger Crowding

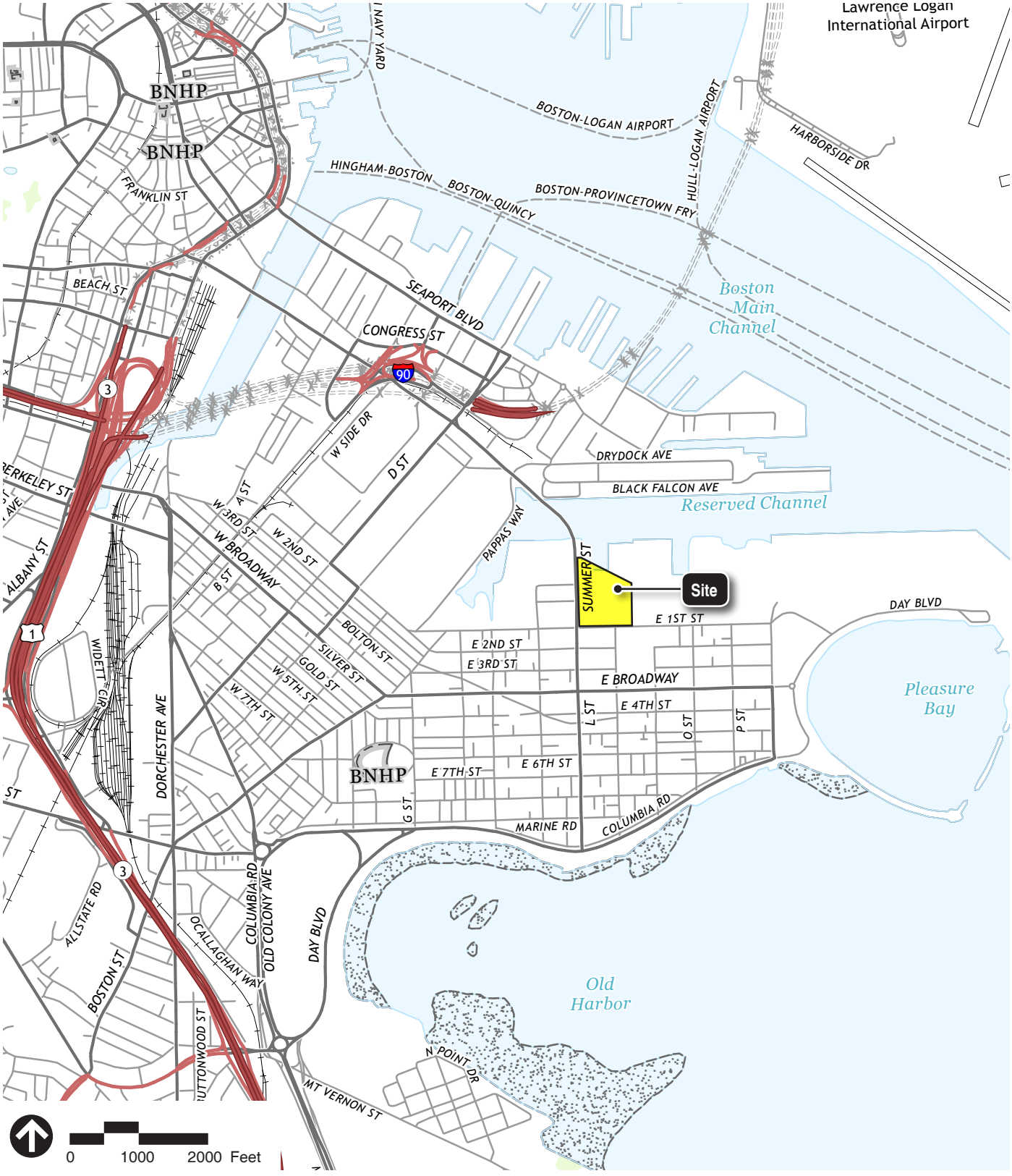
Route	Existing (Baseline)			No Build		Commercial Alternative *Applying City of Boston Aspirational Transit Mode Share*		Commercial Alternative *Expected Project Transit Person Trip Generation*	
	Number of Trips at Site	Number of Trips Exceeding Threshold	Total Passengers Over Threshold	Number of Trips Exceeding Threshold	Total Passengers Over Threshold	Number of Bus Trips Exceeding Threshold	Total Passengers Over Threshold	Number of Bus Trips Exceeding Threshold	Total Passengers Over Threshold
Route 5 IB	7	0	0						
Route 5 OB	6	0	0						
Avg # of passengers per bus exceeding the threshold			0						
Route 7 IB	104	0	0	2	4	5	15	2	6
Route 7 OB	89	0	0	0	0	14	70	7	18
Avg # of passengers per bus exceeding the threshold			4	-	2	-	5	-	3
Route 9 IB	99	1	4	3	10	20	131	16	86
Route 9 OB	97	0	0	2	1	22	159	20	117
Avg # of passengers per bus exceeding the threshold			0	-	2	-	7	-	6
Route 10 IB	42	0	0	0	0	4	29	4	17
Route 10 OB	46	0	0	0	0	3	62	1	49
Avg # of passengers per bus exceeding the threshold			0	-	0	-	13	-	13
Route 11 IB	73	0	0	0	0	1	1	1	1
Route 11 OB	63	0	0	0	0	0	0	0	0
Avg # of passengers per bus exceeding the threshold			0	-	0	-	1	-	1

Bus routes traveling from South Boston to Downtown / Back Bay / Red Line are considered "Inbound" (IB) routes, while bus routes traveling from Downtown / Back Bay / Red Line to City Point are considered "Outbound" (OB) routes.

Table 1-10 Commercial Alternative vs. Proposed Program Summary of Bus Passenger Crowding

Route		Commercial Alternative *Applying City of Boston Aspirational Transit Mode Share*		Commercial Alternative *Expected Project Transit Person Trip Generation*		Proposed Program *Applying City of Boston Aspirational Transit Mode Share*		Proposed Program *Expected Project Transit Person Trip Generation*	
		Number of Bus Trips Exceeding Threshold	Total Passengers Over Threshold	Number of Bus Trips Exceeding Threshold	Total Passengers Over Threshold	Number of Bus Trips Exceeding Threshold	Total Passengers Over Threshold	Number of Bus Trips Exceeding Threshold	Total Passengers Over Threshold
Route 5 IB									
Route 5 OB									
Avg # of passengers per bus exceeding the threshold									
Route 7 IB		5	15	2	6	14	93	14	81
Route 7 OB		14	70	7	18	13	71	13	57
Avg # of passengers per bus exceeding the threshold		-	5	-	3	-	6	-	5
Route 9 IB		20	131	16	86	19	143	19	125
Route 9 OB		22	159	20	117	20	157	20	134
Avg # of passengers per bus exceeding the threshold		-	7	-	6	-	8	-	7
Route 10 IB		4	29	4	17	3	9	3	5
Route 10 OB		3	62	1	49	1	3	1	1
Avg # of passengers per bus exceeding the threshold		-	13	-	13	-	3	-	2
Route 11 IB		1	1	1	1	1	1	1	1
Route 11 OB		0	0	0	0	0	0	0	0
Avg # of passengers per bus exceeding the threshold		-	1	-	1	-	1	-	1

Bus routes traveling from South Boston to Downtown / Back Bay / Red Line are considered "Inbound" (IB) routes, while bus routes traveling from Downtown / Back Bay / Red Line to City Point are considered "Outbound" (OB) routes.

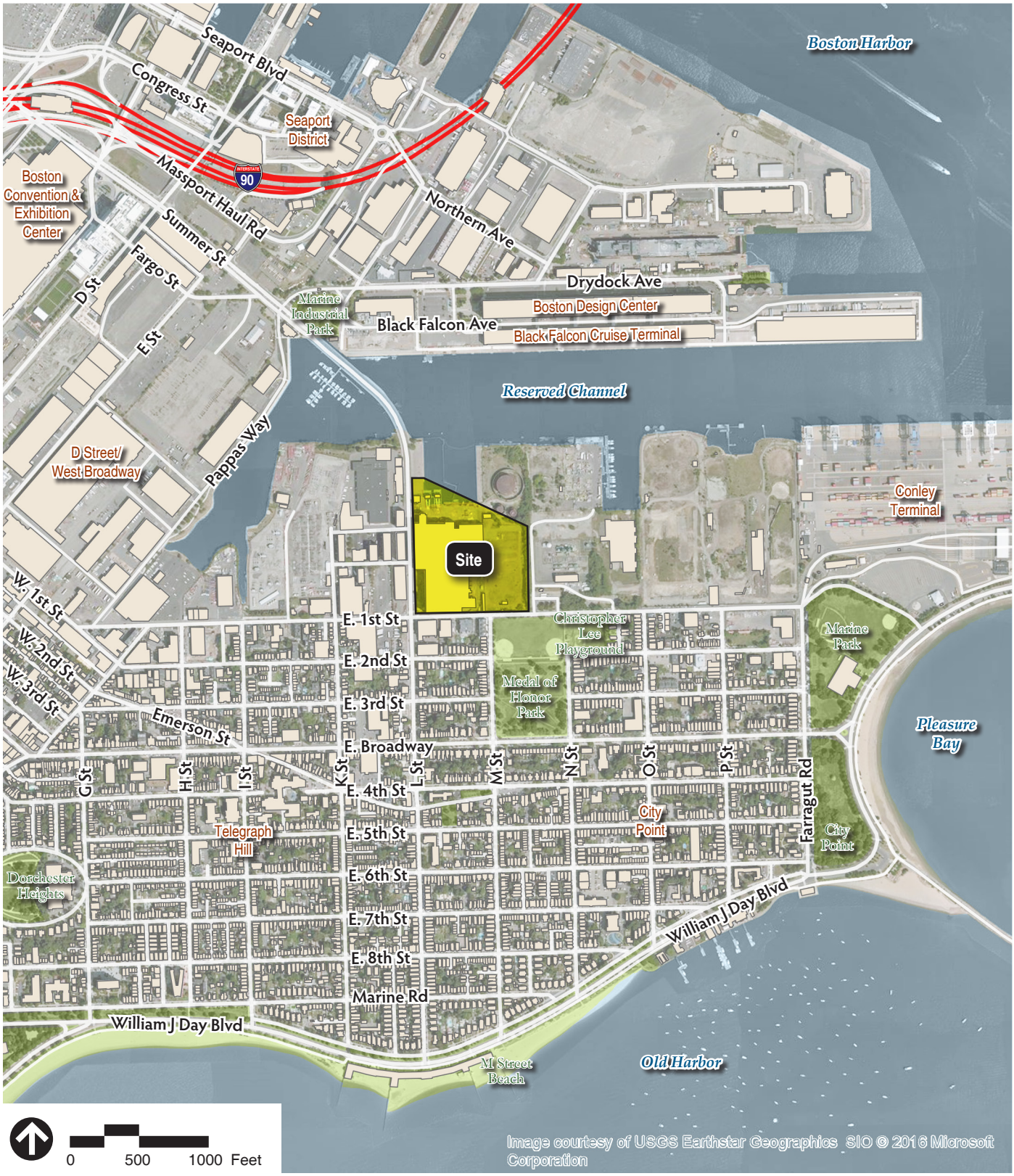


Source: 2015 USGS Topo Boston South

Figure 1.1

Site Locus Map

L Street Station Redevelopment
Boston, Massachusetts

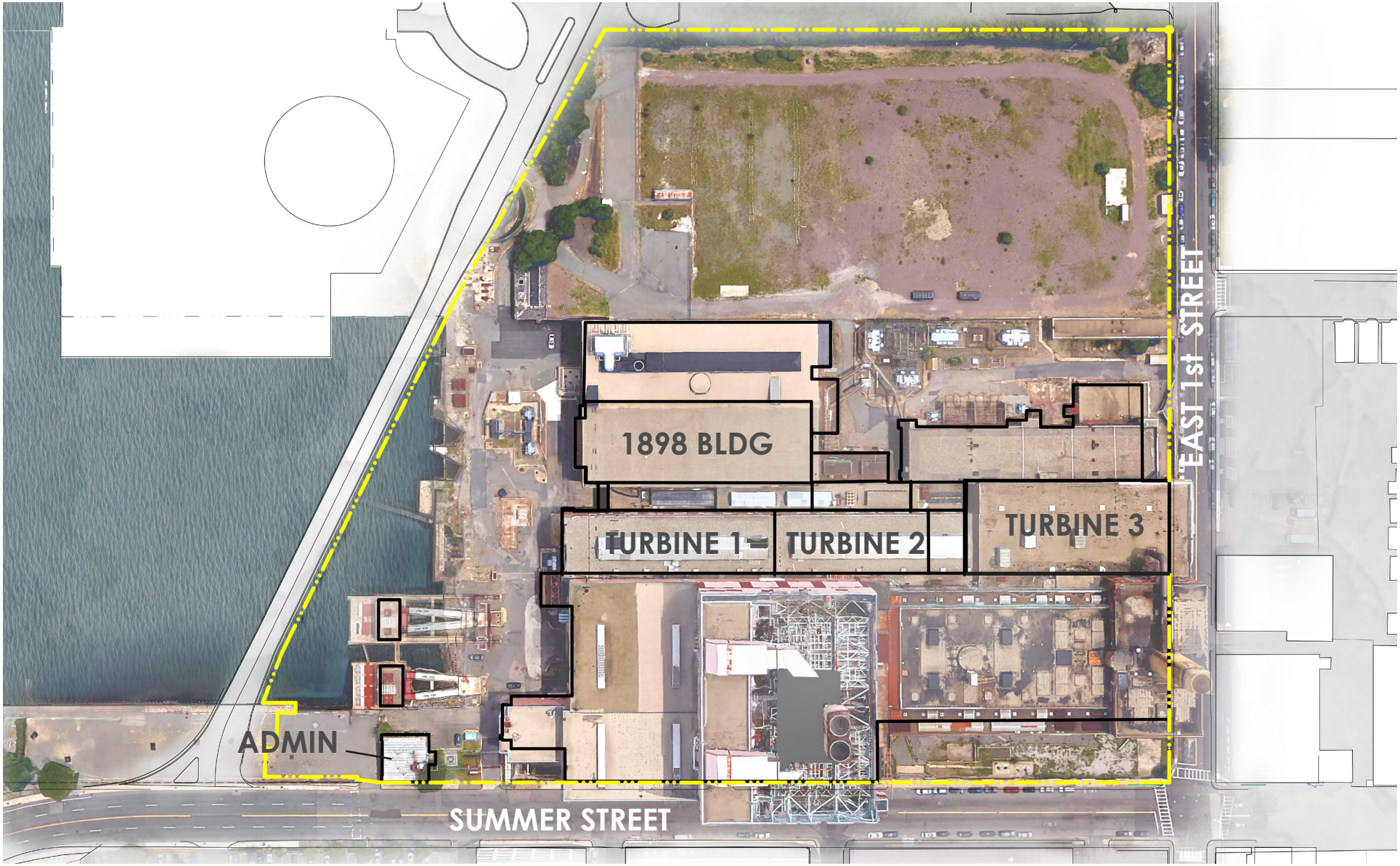


Source: ArcGIS Bing Aerial, MassGIS

Figure 1.2

Project Site Context

L Street Station Redevelopment
Boston, Massachusetts



N

0 50 100 150 Feet

SCALE1"=150'

Stantec

Figure 1.3

Existing Conditions

L Street Station Redevelopment
Boston, Massachusetts

NEW
EXISTING TO REMAIN
PROJECT SITE

Figure 1.4
Previously Reviewed Site Plan

L Street Station Redevelopment
Boston, Massachusetts

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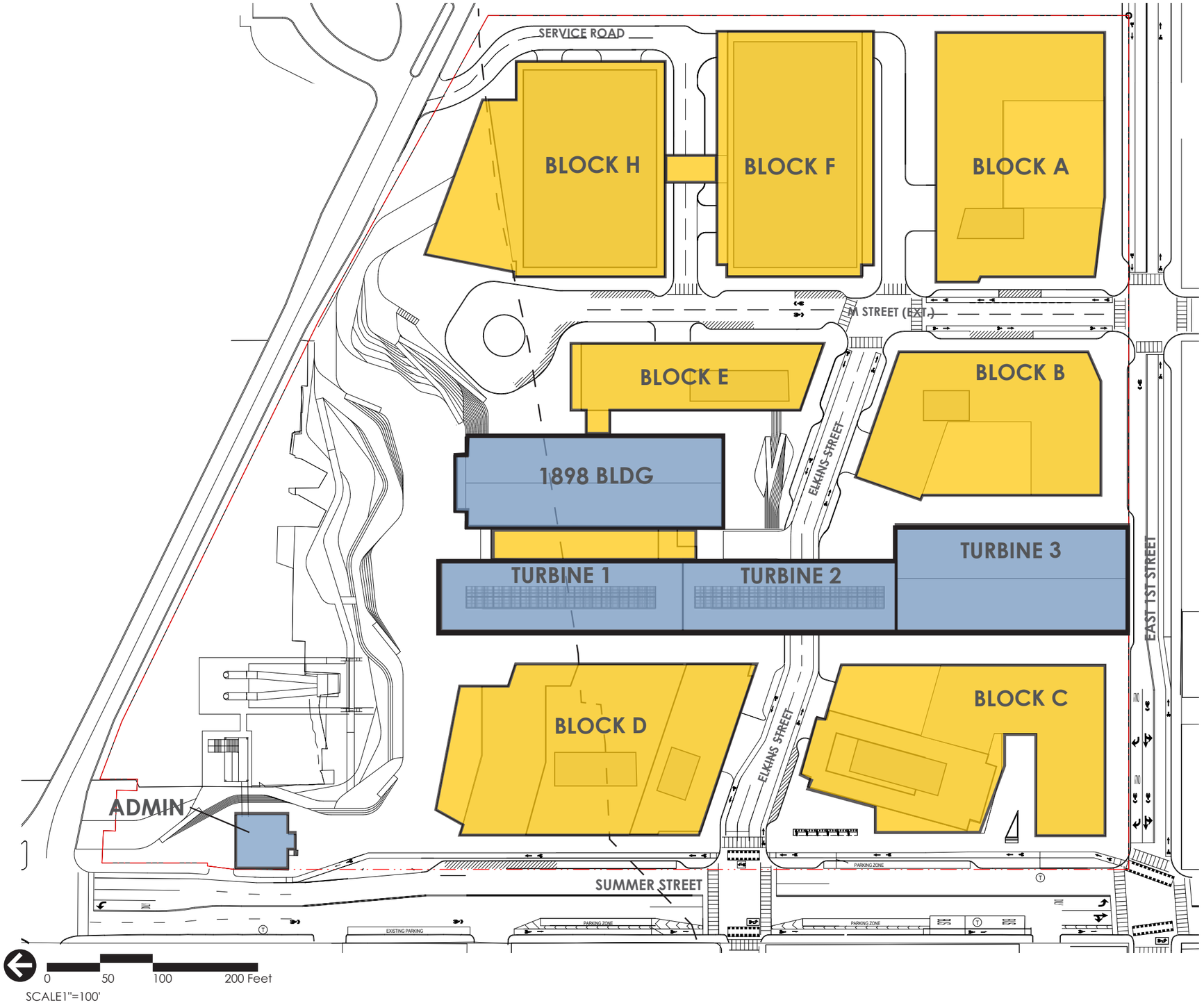

NEW
EXISTING TO REMAIN
PROJECT SITE

Figure 1.5
Proposed Site Plan

L Street Station Redevelopment
Boston, Massachusetts

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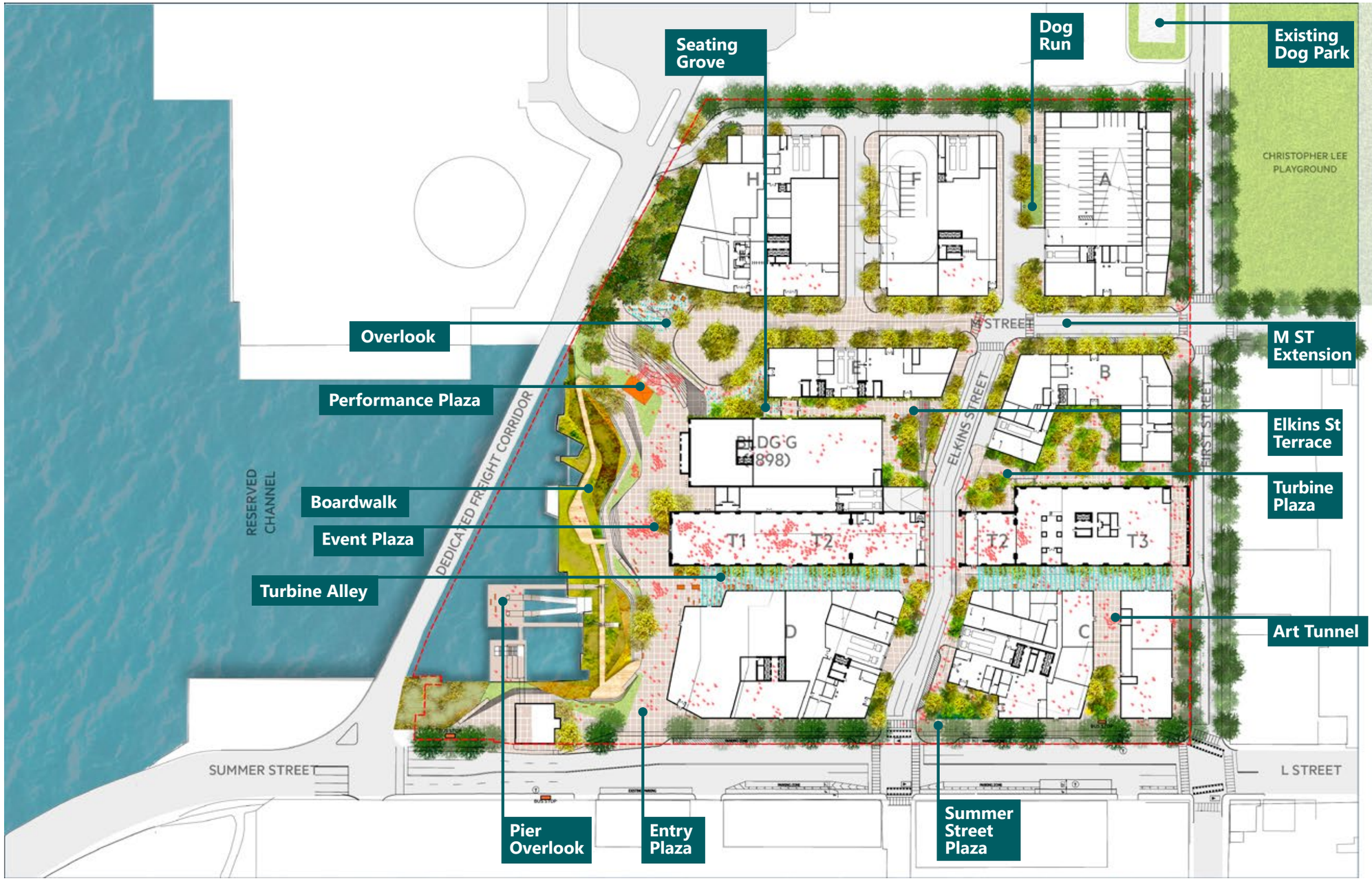


N

Figure 1.6

Conceptual Landscape Plan

L Street Station Redevelopment
Boston, Massachusetts

STOSS

TURBINE HALL 1: LOOKING SOUTH TOWARDS TURBINE HALL 2

Figure 1.7a
Project Renderings

TURBINE HALL 1: LOOKING NORTH TOWARDS WATERFRONT

Figure 1.7b
Project Renderings

TURBINE HALL 2: LOOKING NORTH OF PASS-THRU TOWARDS EXHIBITION HALL

Figure 1.7c
Project Renderings

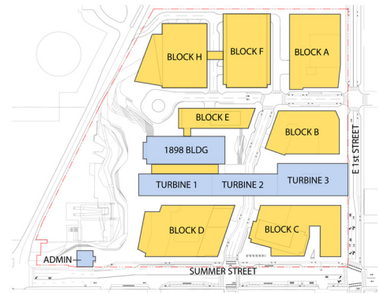
TURBINE HALL 2: LOOKING SOUTH OF PASS-THRU TOWARDS MUSEUM

Figure 1.7d
Project Renderings

1898 BLDG: FROM ELKINS STREET TOWARDS 1898 BLDG

Figure 1.7e
Project Renderings

Note: 1898 bldg Turbine1, Turbine2, Turbine3 and Admin Building are existing historical power plant buildings that will be retained and renovated.



— — — CHAPTER 91
HOTEL
RETAIL
RENTAL
CONDO
OFFICE
RESEARCH & DEVELOPMENT
CIVIC/ CULTURAL
LOADING,BOH & MECH.
PARKING
▲ BUILDING ENTRANCE

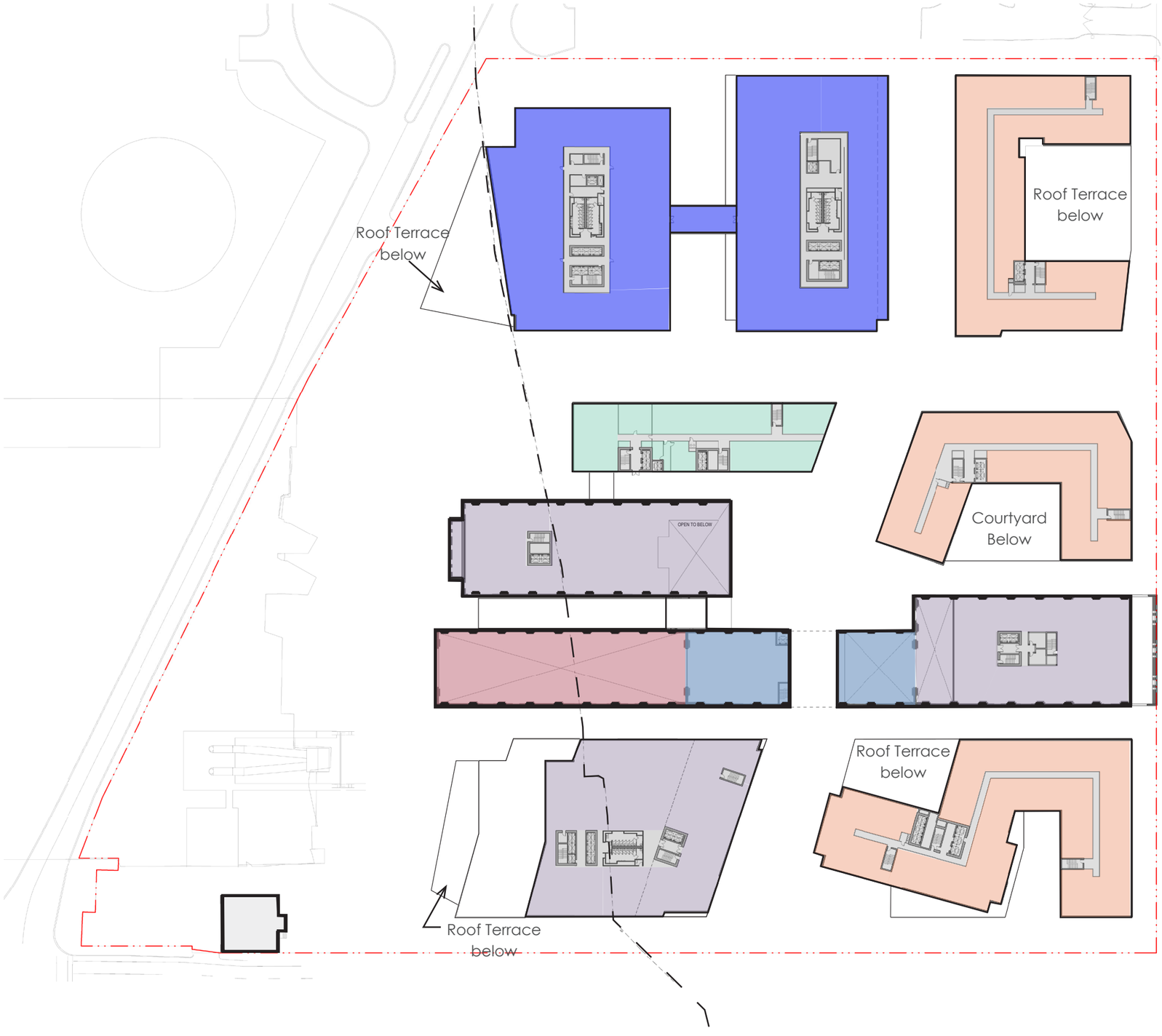
Figure 1.8a

Floor Plan - Ground Level Plan

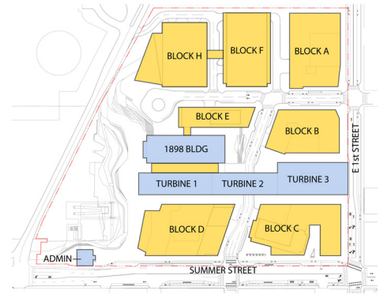
L Street Station Redevelopment
Boston, Massachusetts

N
0 50 100 200 Feet
SCALE1"=100'

Stantec



Note: 1898 bldg Turbine1, Turbine2, Turbine3 and Admin Building are existing historical power plant buildings that will be retained and renovated.



- — — — CHAPTER 91
- HOTEL
- RETAIL
- RENTAL
- CONDO
- OFFICE
- RESEARCH & DEVELOPMENT
- CIVIC/ CULTURAL
- LOADING,BOH & MECH.
- PARKING
- BUILDING ENTRANCE

Figure 1.8b

Floor Plan - 3rd Level Plan

L Street Station Redevelopment
Boston, Massachusetts

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BEFORE

AFTER

E. 1st STREET

E. First Street looking west from Thomas Butler Dog Park

Project View Perspectives/ Renderings

Figure 1.9a

Project Perspectives

L Street Station Redevelopment
Boston, Massachusetts

Stantec

BEFORE

AFTER

E. 1st STREET

E. First Street looking West at Turbine Hall #3
Project View Perspectives/ Renderings

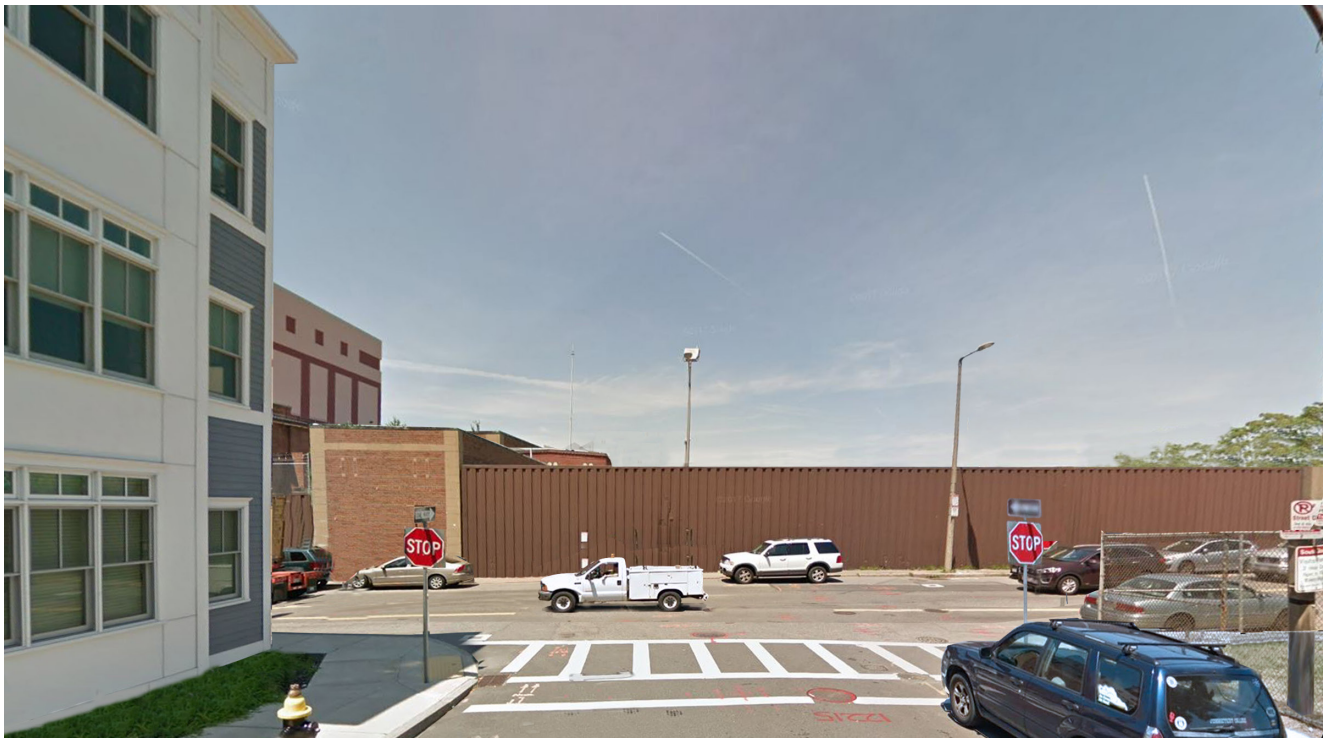
Figure 1.9b

Project Perspectives

L Street Station Redevelopment
Boston, Massachusetts

Stantec

BEFORE



AFTER

M. STREET

M Street looking north to new M Street extension

Project View Perspectives/ Renderings

Stantec

Figure 1.9c

Project Perspectives

L Street Station Redevelopment
Boston, Massachusetts

BEFORE

AFTER

SUMMER STREET/ E. 1st STREET

Summer Street looking east at L Street/E. First Street intersection

Project View Perspectives/ Renderings

Figure 1.9d

Project Perspectives

L Street Station Redevelopment
Boston, Massachusetts

Stantec

BEFORE

AFTER

E. 1st STREET

E. First Street looking east at L Street/E. First Street intersection

Project View Perspectives/ Renderings

Figure 1.9e

Project Perspectives

L Street Station Redevelopment
Boston, Massachusetts

Stantec

BEFORE

AFTER

ELKINS STREET/ SUMMER STREET

Elkins Street intersection looking east
Project View Perspectives/ Renderings

Figure 1.9f

Project Perspectives

L Street Station Redevelopment
Boston, Massachusetts

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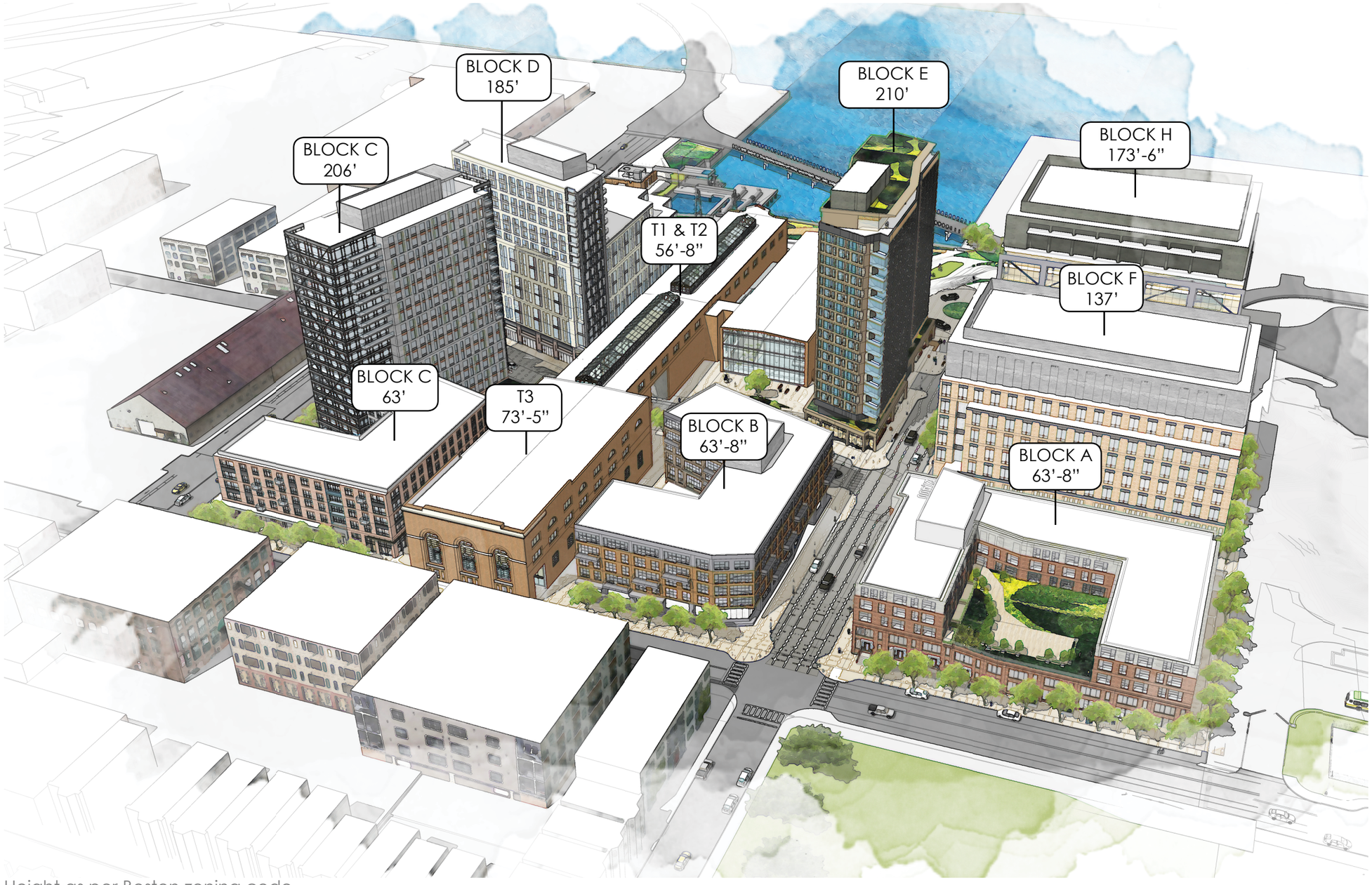
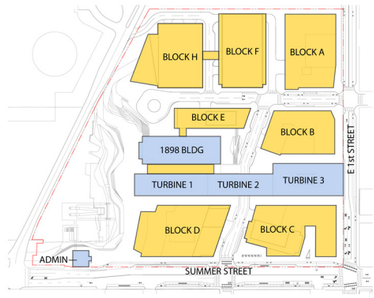


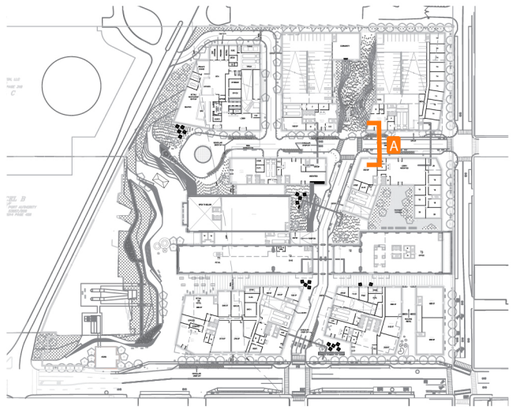


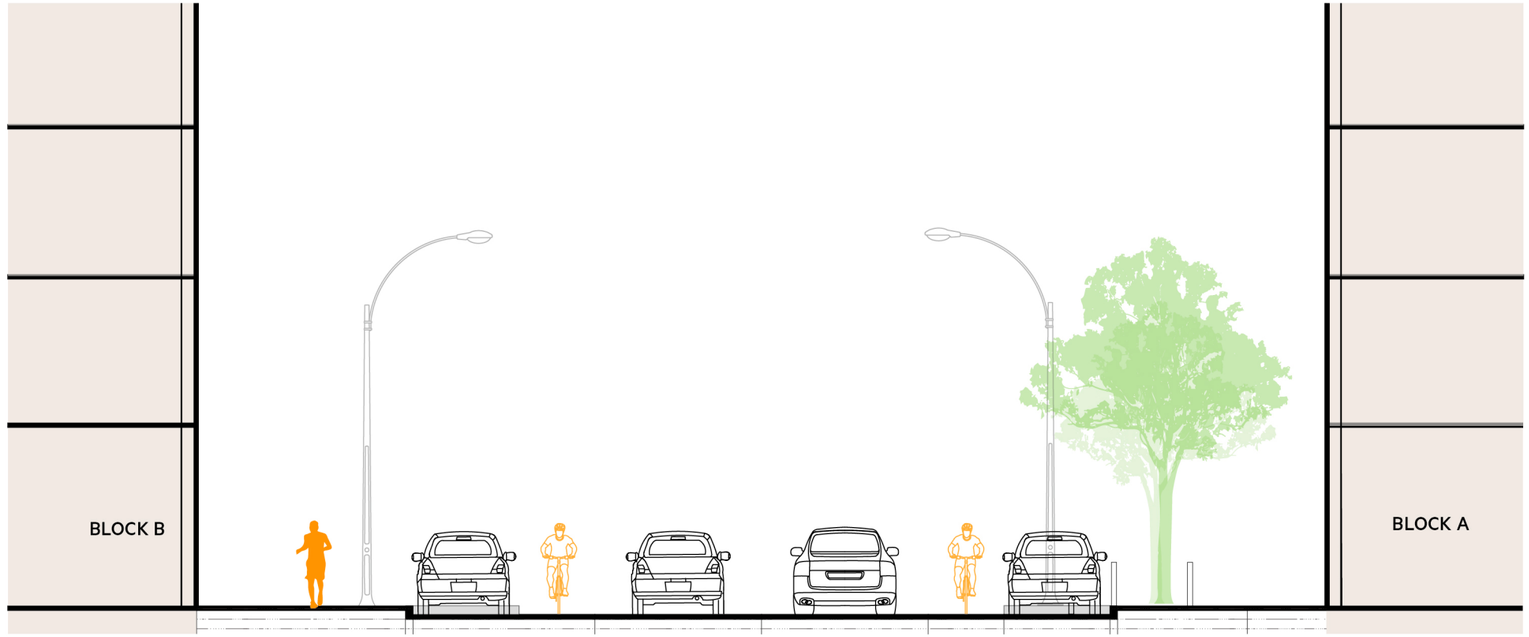
Height as per Boston zoning code

Figure 1.10
Massing

L Street Station Redevelopment
Boston, Massachusetts

Stantec





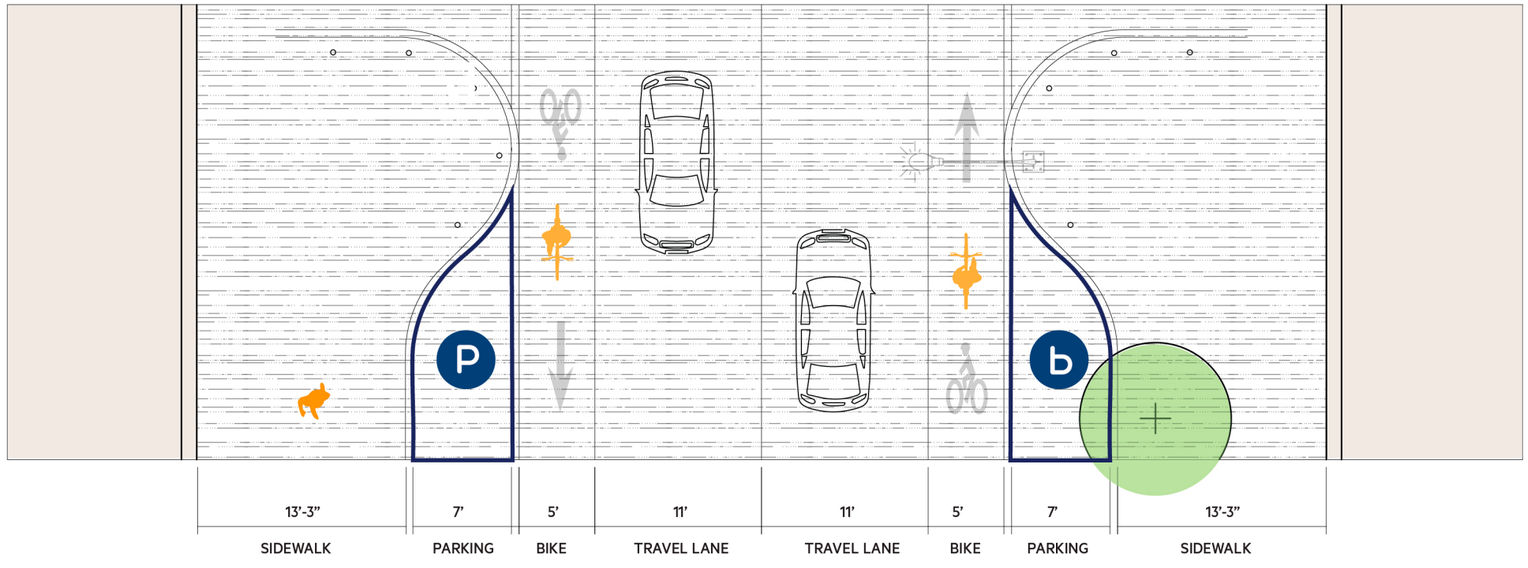
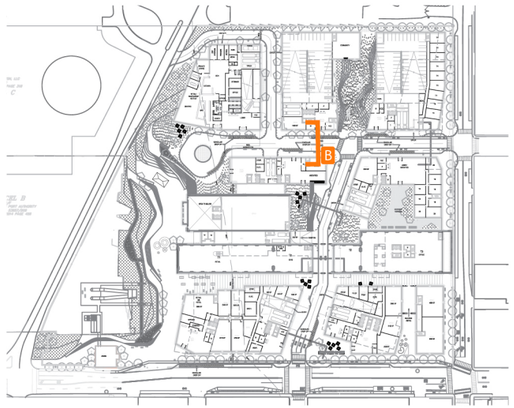


Figure 1.11a

Street Section - A at M Street

L Street Station Redevelopment
Boston, Massachusetts



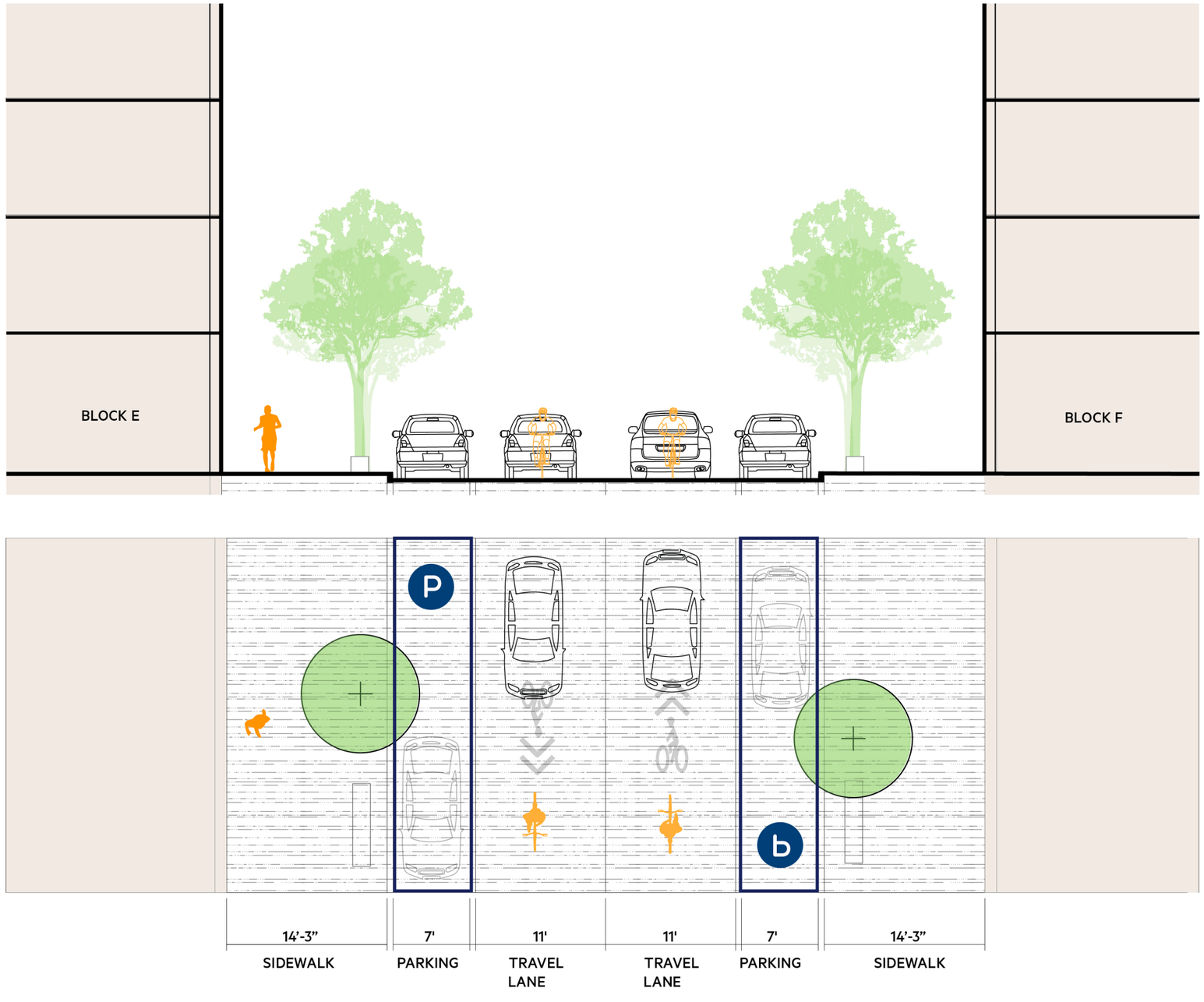
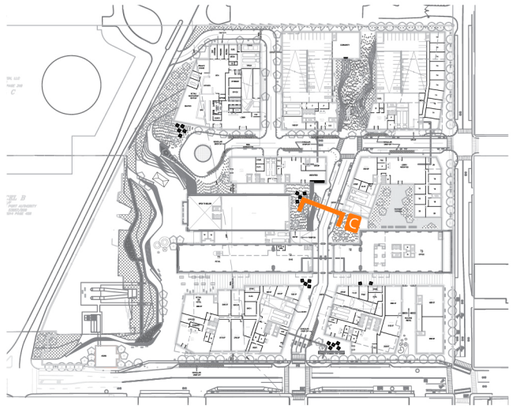


Figure 1.11b

Street Section - E-F at M Street



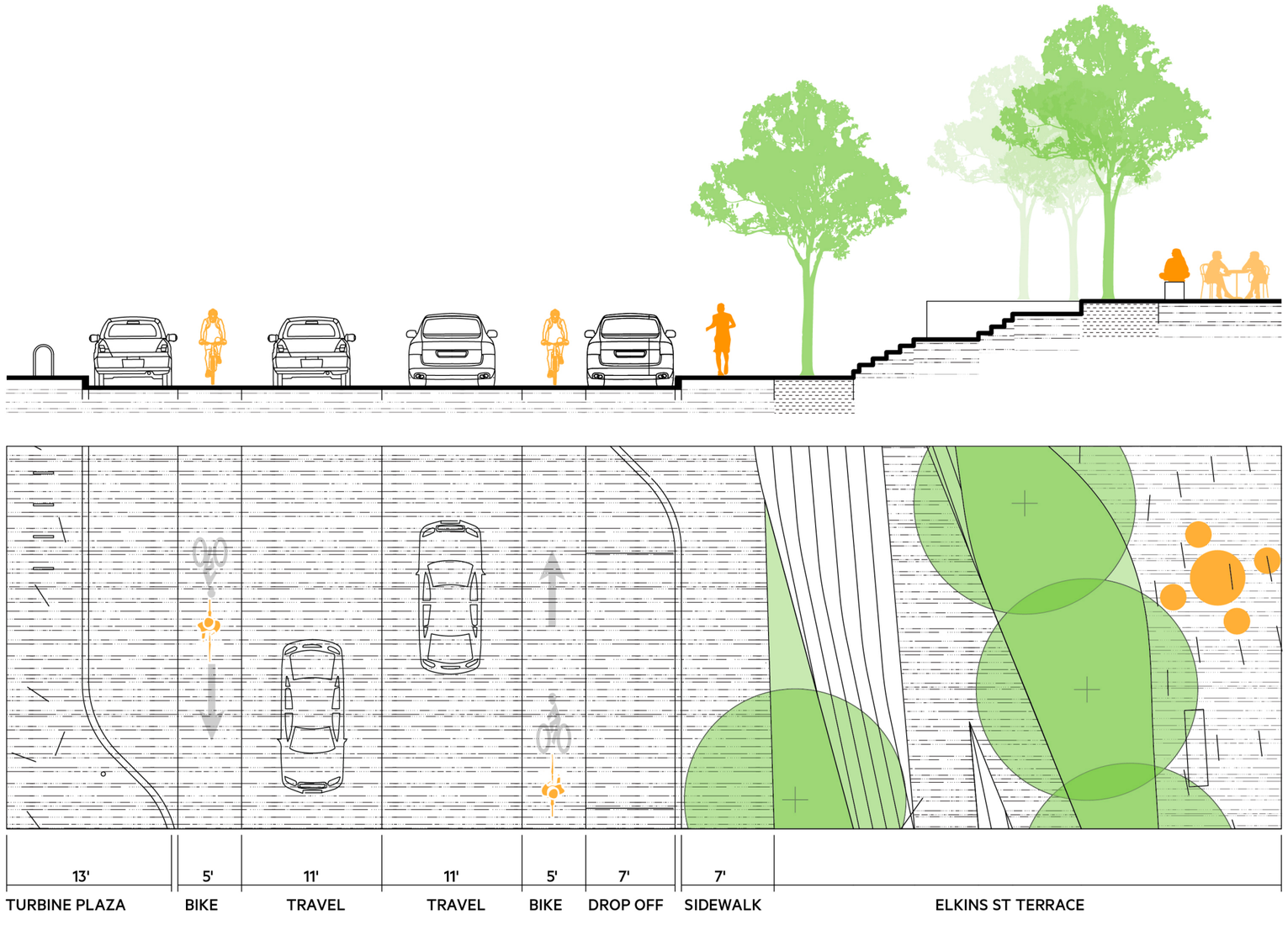
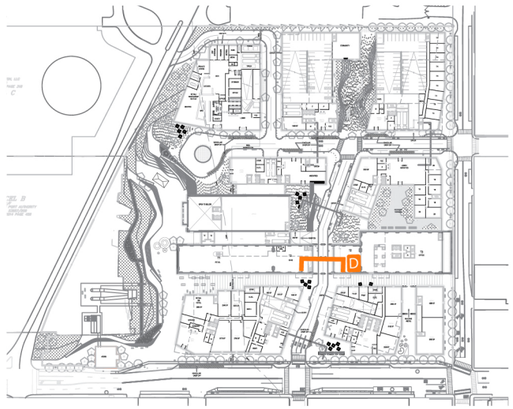


Figure 1.11c

Street Section - Elkins Street



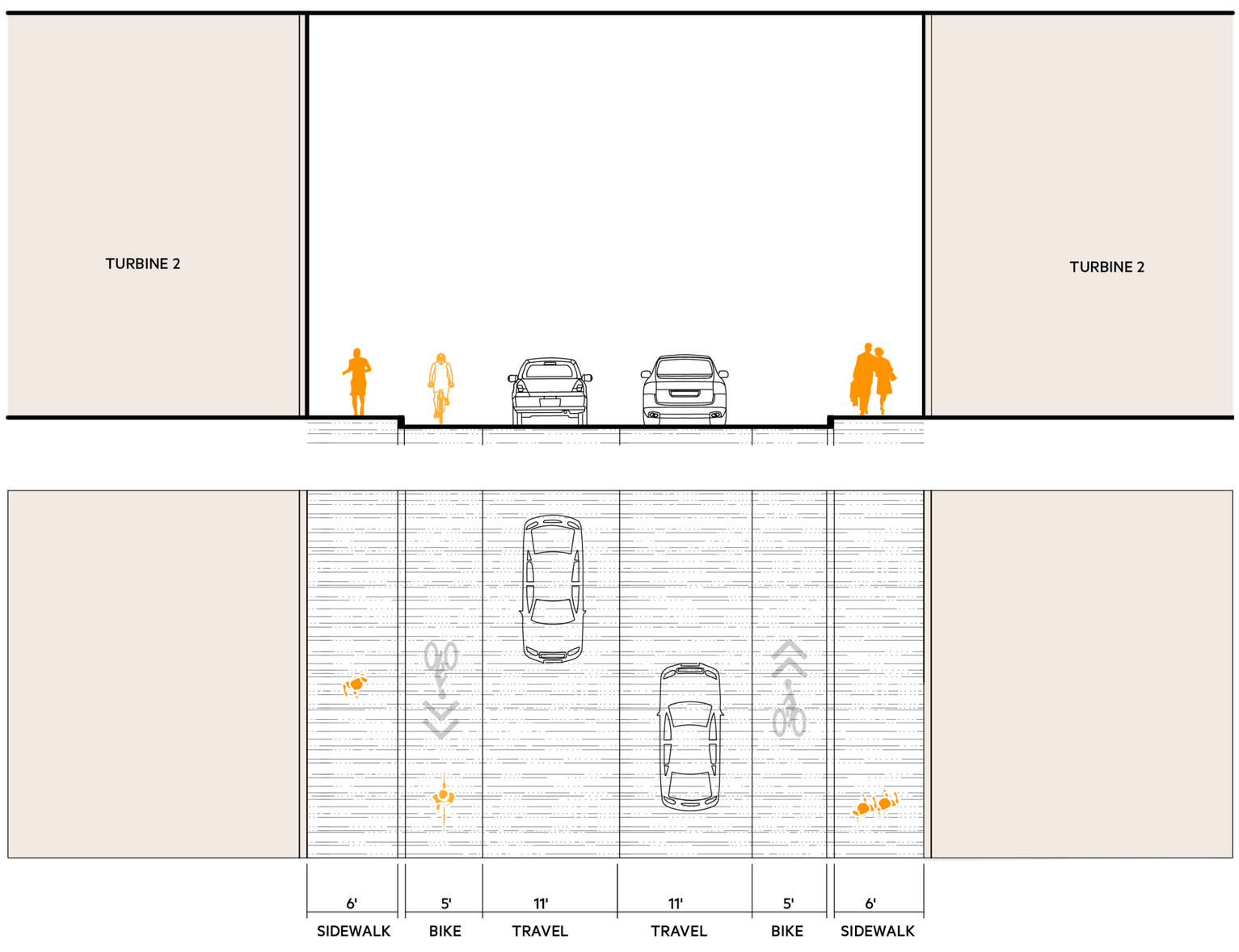
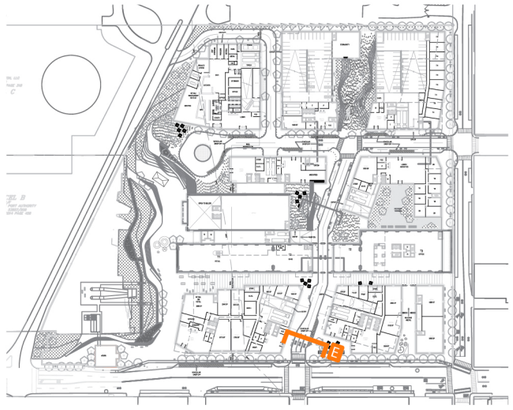


Figure 1.11d

Street Section - Turbine Hall at Elkins Street



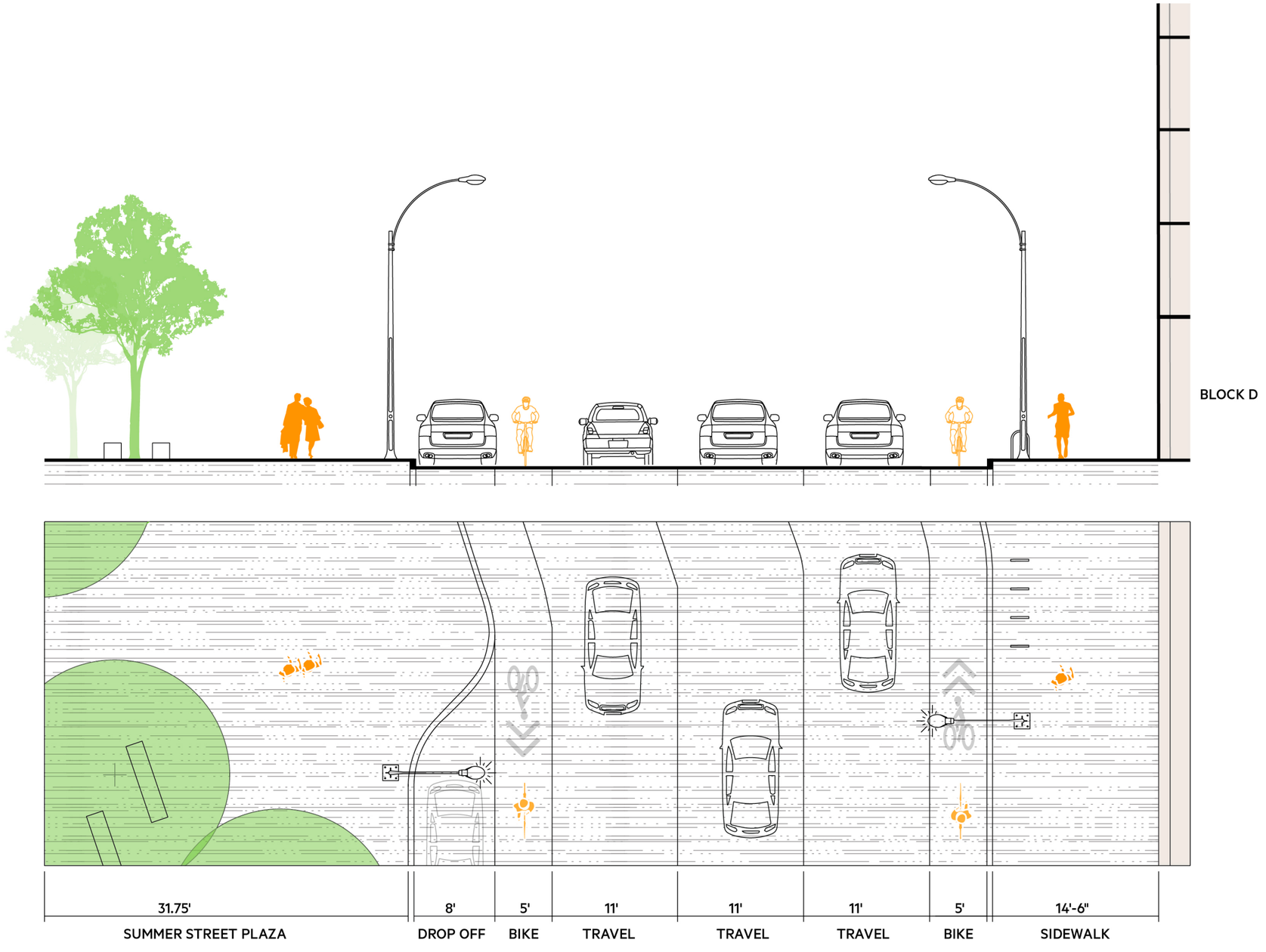
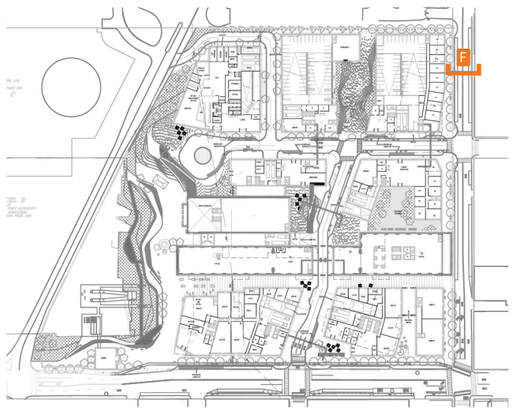


Figure 1.11e

Street Section - D at Elkins/Summer Street



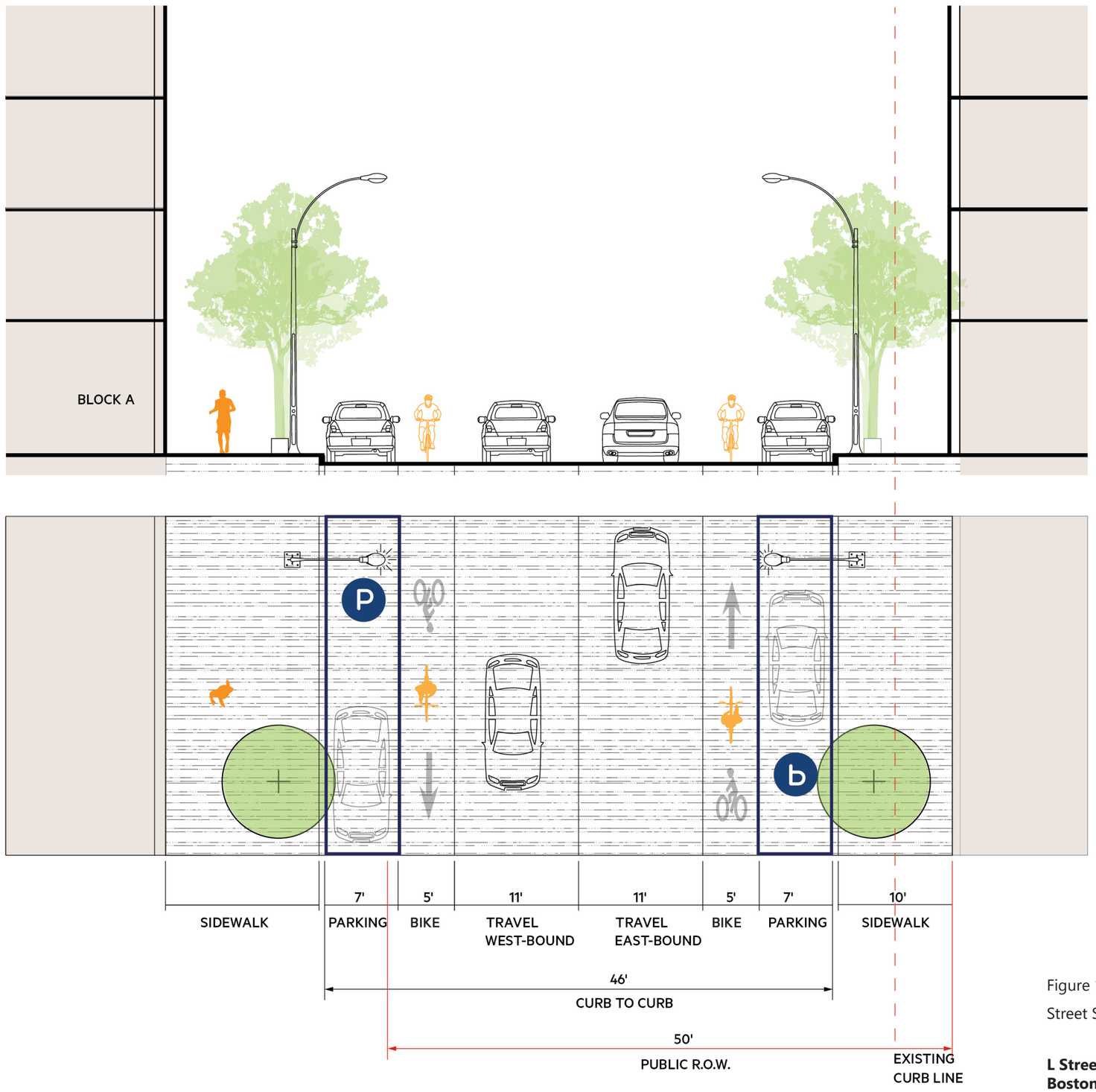
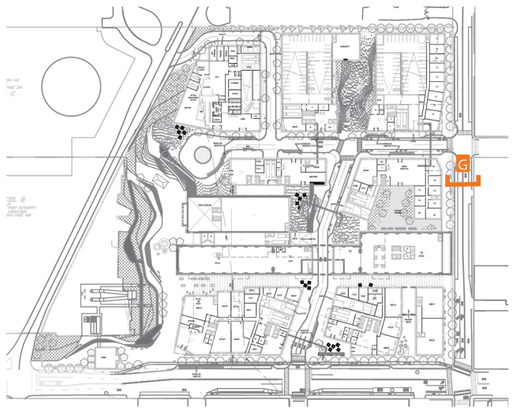


Figure 1.11f

Street Section - A at East First Street

L Street Station Redevelopment
Boston, Massachusetts



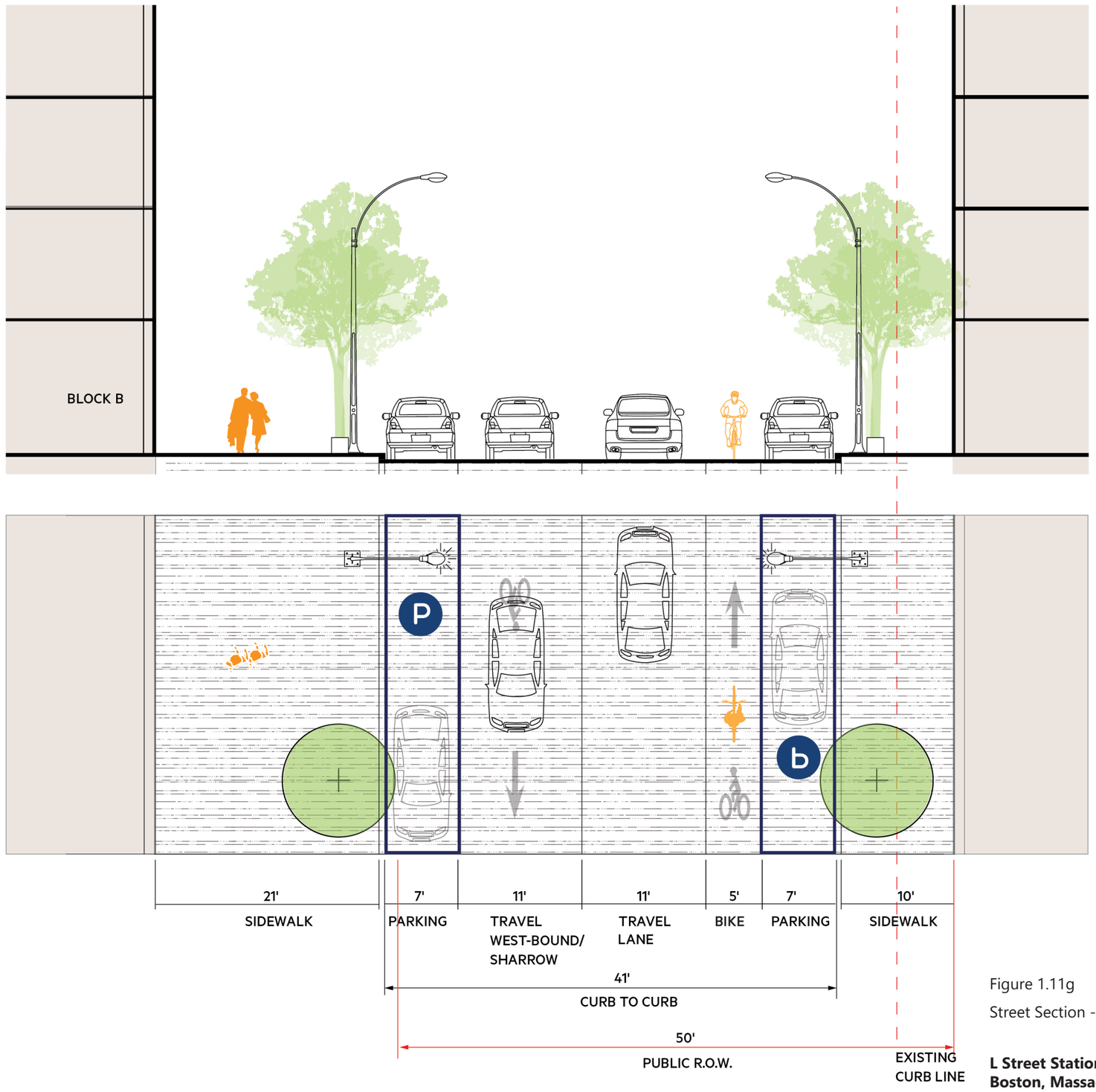
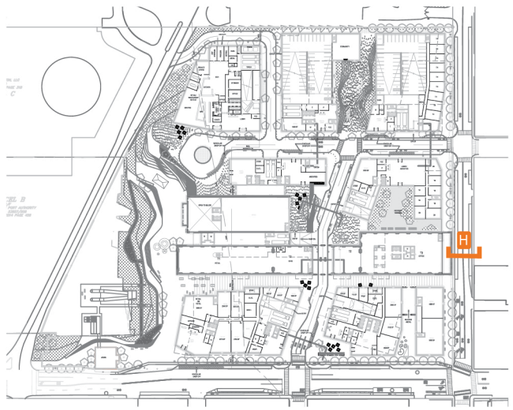


Figure 1.11g

Street Section - B at East First Street

L Street Station Redevelopment
Boston, Massachusetts



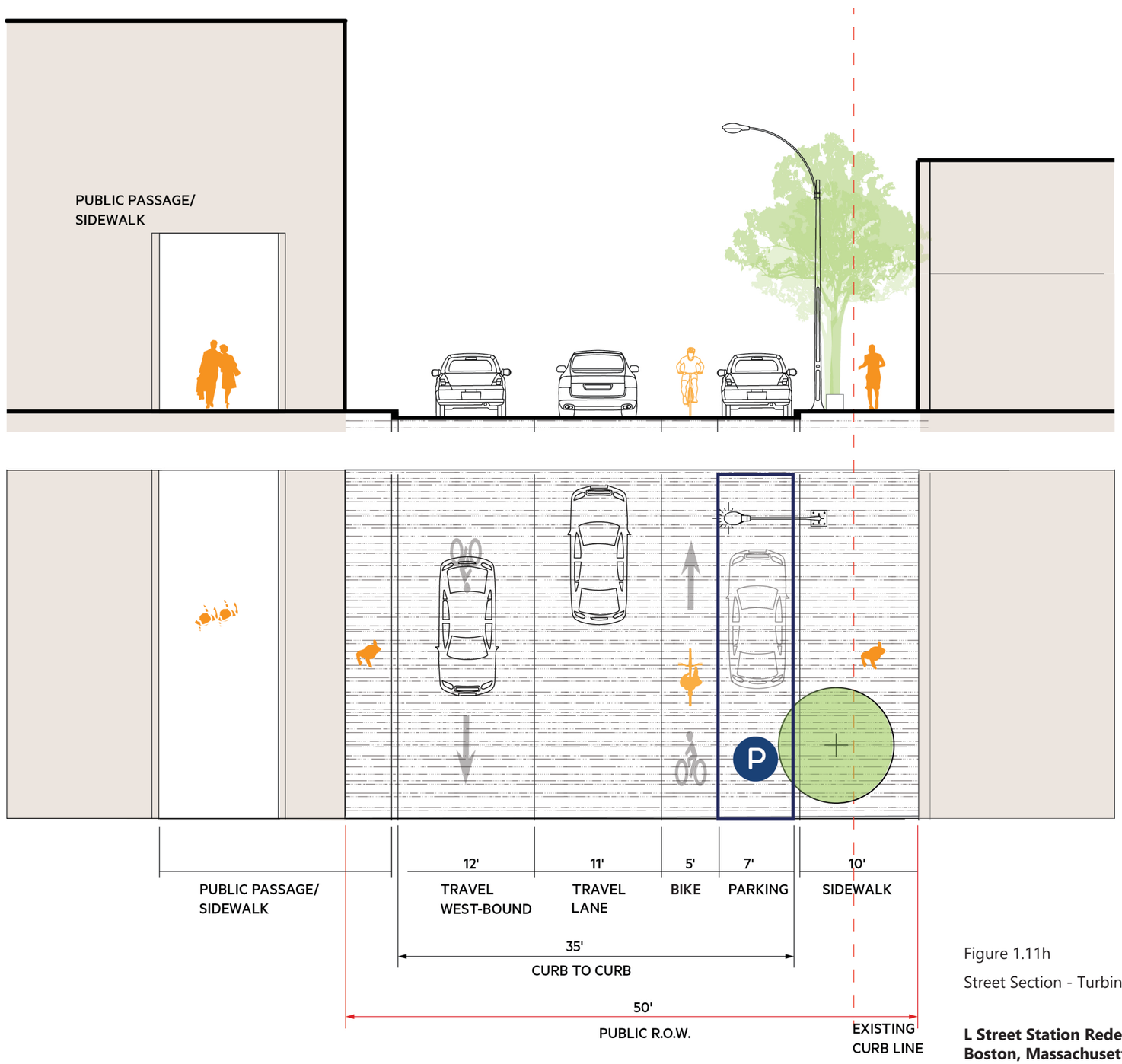
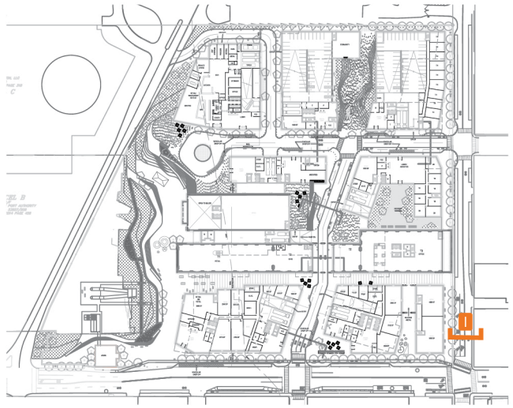


Figure 1.11h

Street Section - Turbine 3 at East First Street

L Street Station Redevelopment
Boston, Massachusetts



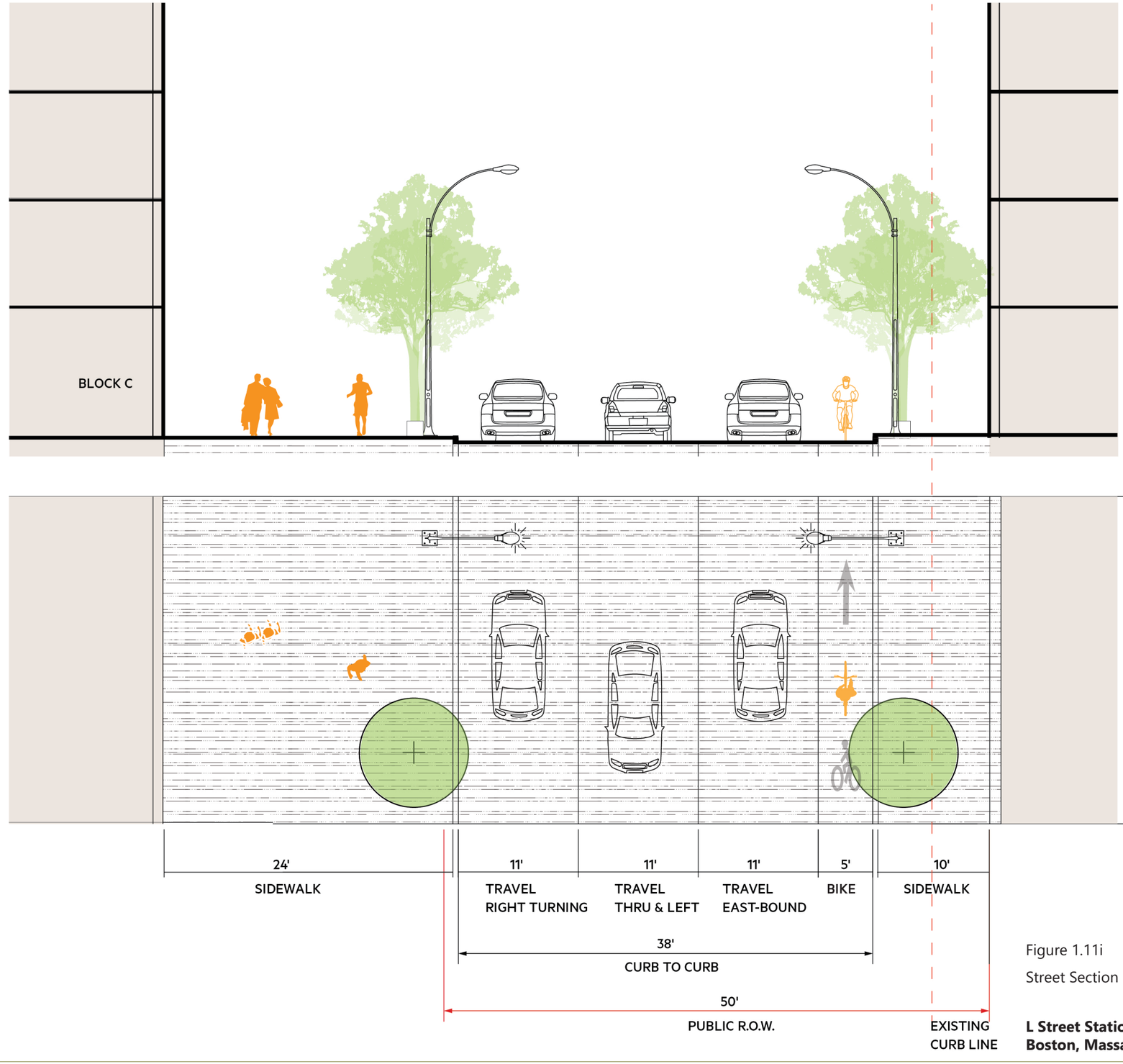
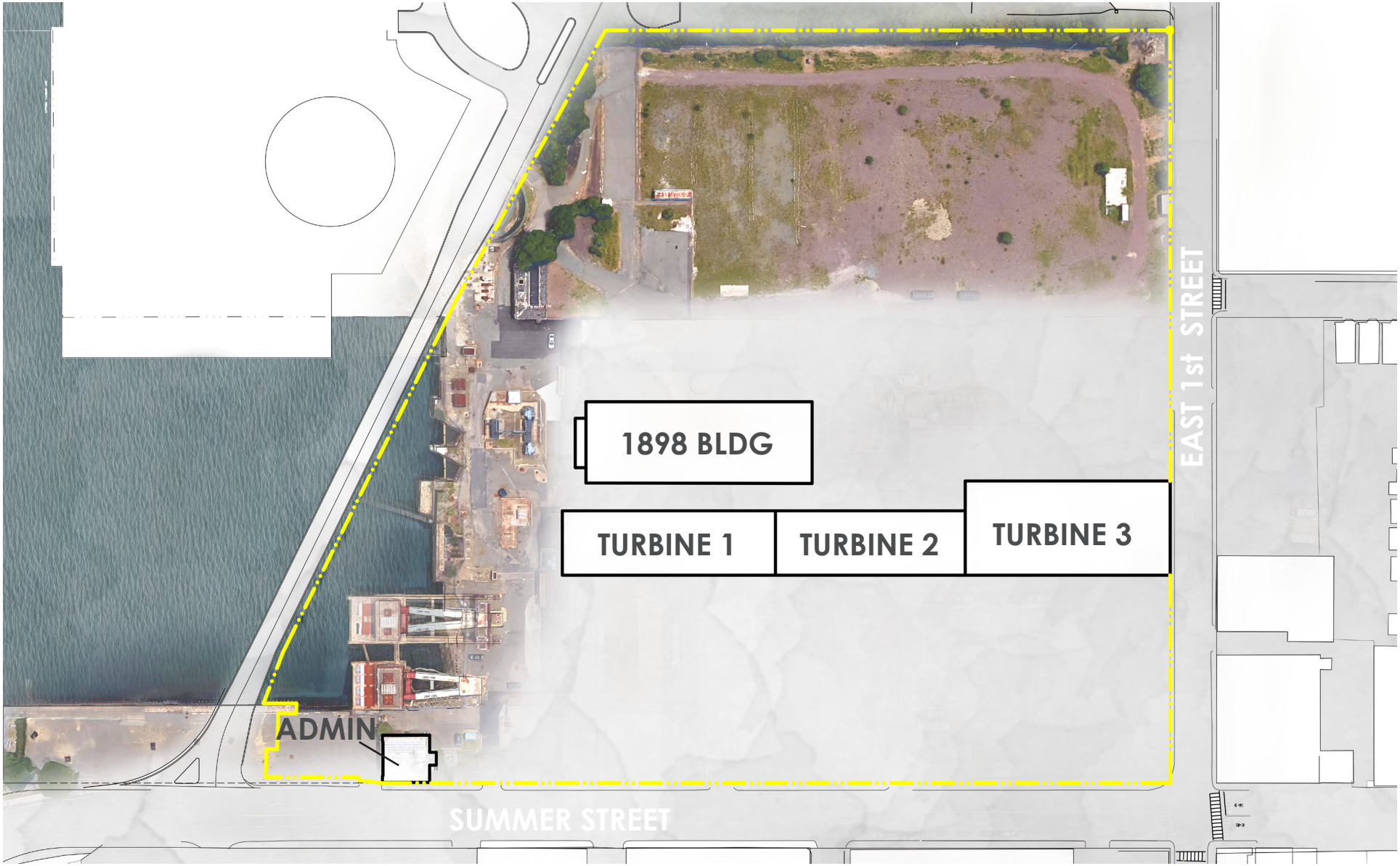


Figure 1.11i

Street Section - C at East First Street

L Street Station Redevelopment
Boston, Massachusetts



N

0 50 100 150 Feet

SCALE1"=150'

Stantec

Figure 1.12a PHASING PLANS

PHASE: **Demolition**

YEAR: **2019**

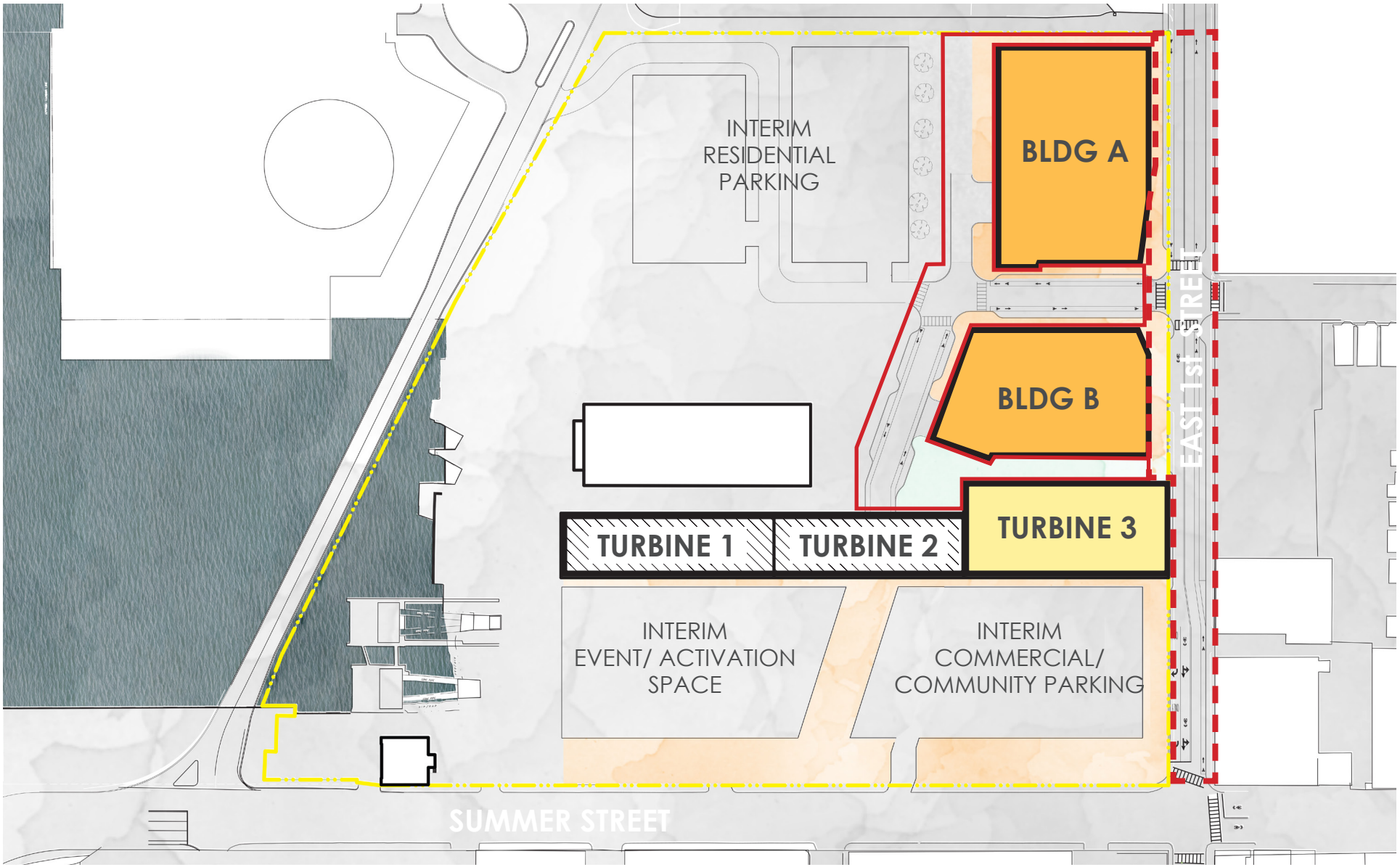


Figure 1.12b PHASING PLANS

PHASE: **1a**

YEAR: **2020-2022**

N

0 50 100 150 Feet

SCALE1"=150'

Stantec

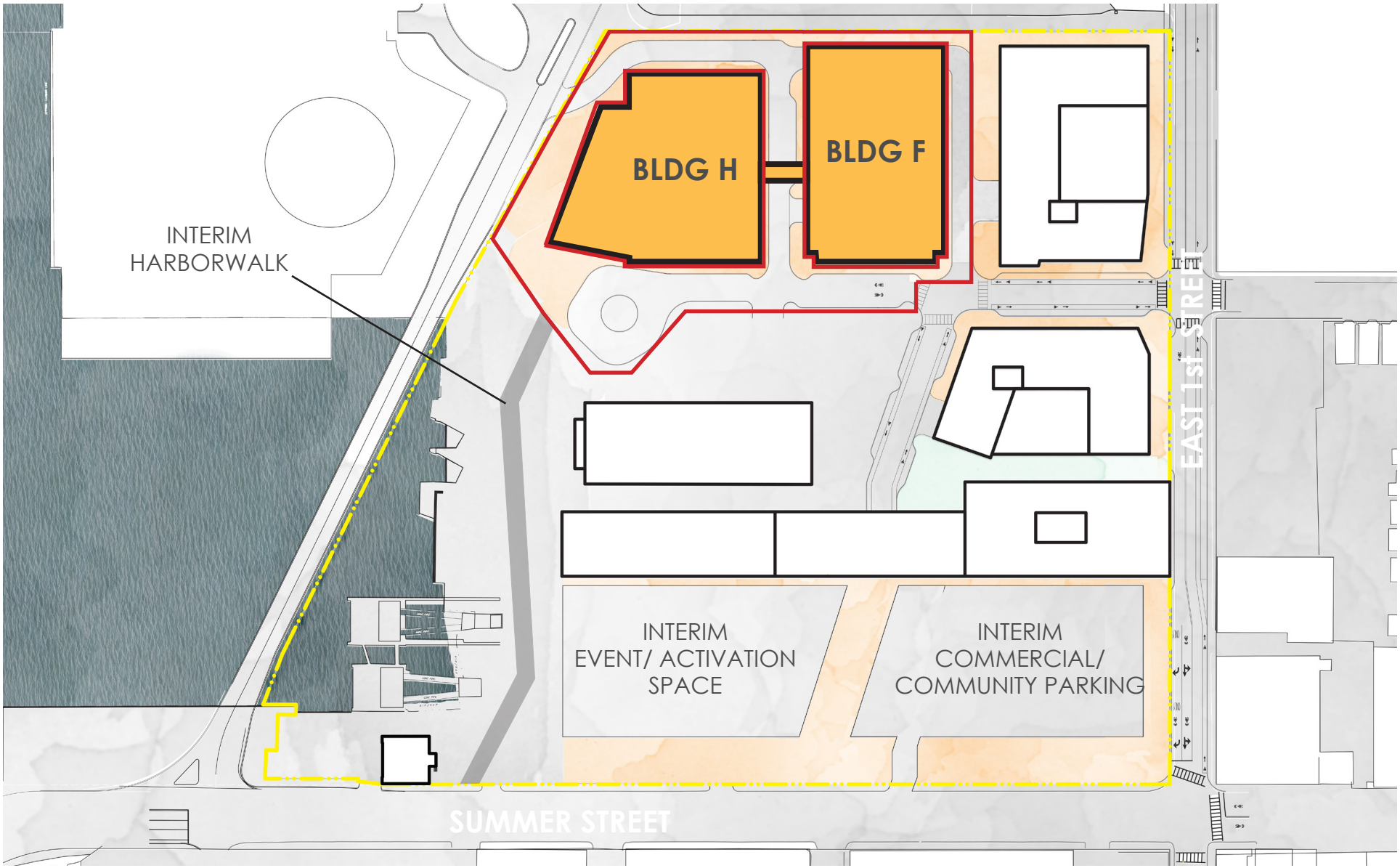


Figure 1.12c PHASING PLANS

PHASE: **1b**

YEAR: **2021-2023**

N

0 50 100 150 Feet

SCALE1"=150'

Stantec

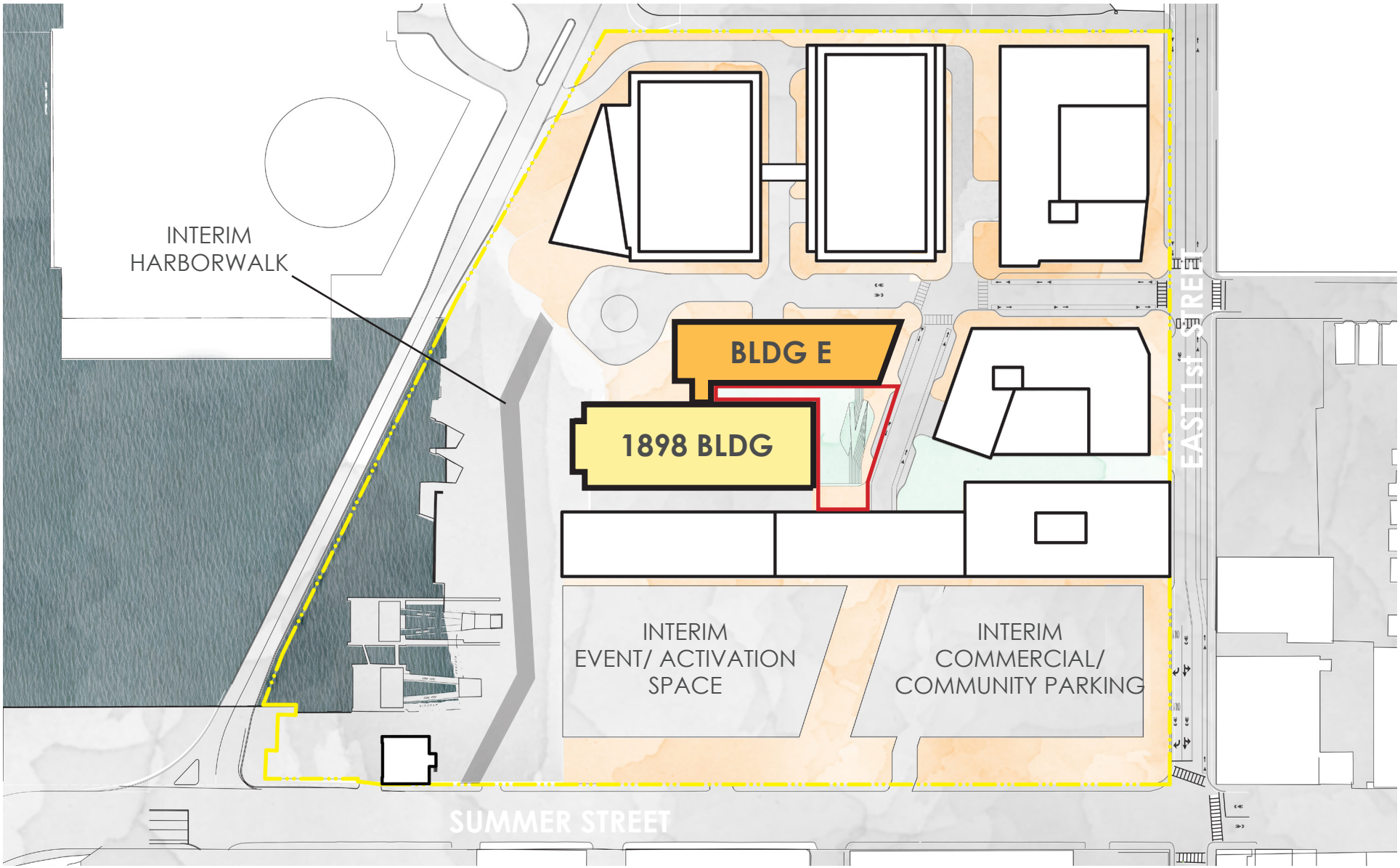


Figure 1.12d PHASING PLANS

PHASE: **1c**

YEAR: **2022-2024**

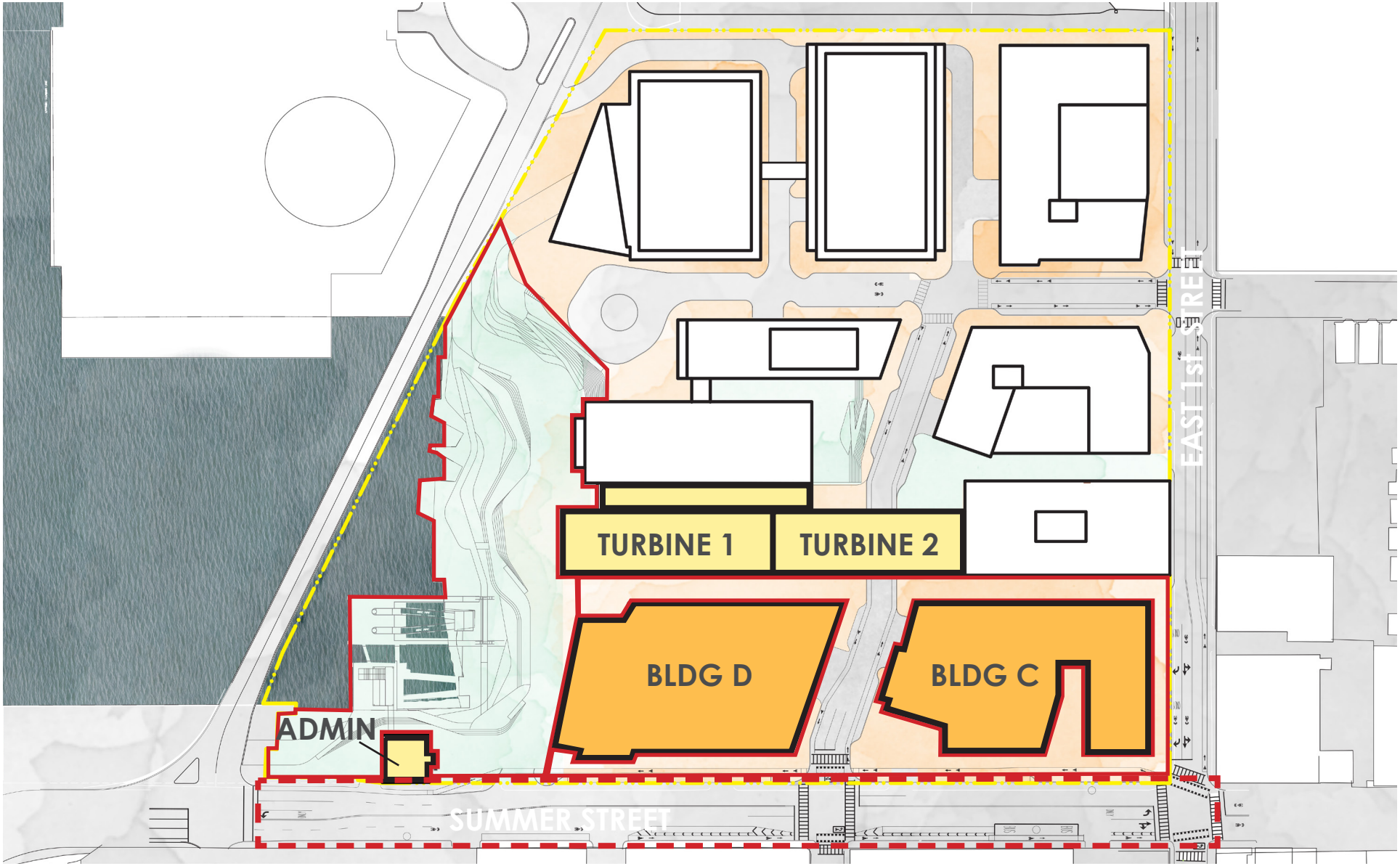
N

0 50 100 150 Feet

SCALE1"=150'

Stantec

Infrastructure
Buildings
Public Street Improvements



N
0 50 100 150 Feet
SCALE1"=150'

Stantec

Figure 1.12e PHASING PLANS

PHASE: **2**

YEAR: **2024-2030**

1.78M TOTAL GSF

TOTALS:
0 Residential Units
852,000 SF Office
474 Hotel Keys
64,000 SF Retail
614,000 SF Research & Development

- CHAPTER 91
- HOTEL
- RETAIL
- OFFICE
- RESEARCH & DEVELOPMENT
- CIVIC/ CULTURAL

Figure 1.13- ALL COMMERCIAL ALTERNATIVE

L Street Station Redevelopment
Boston, Massachusetts

Stantec

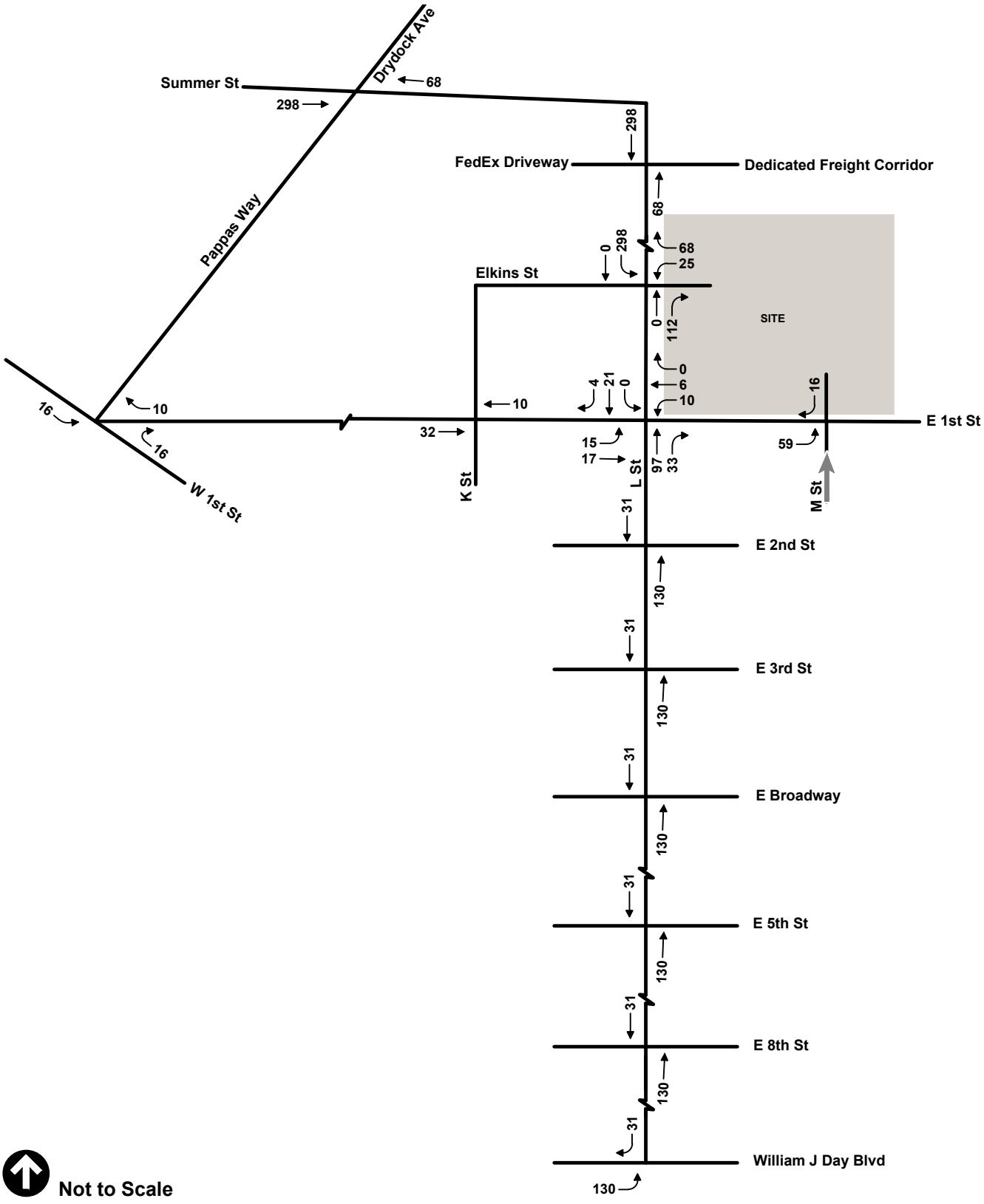


Figure 1.14a

Commercial Alternative Trips
AM Peak Hour (8:00 AM - 9:00 AM)

L Street Station Redevelopment
South Boston, Massachusetts

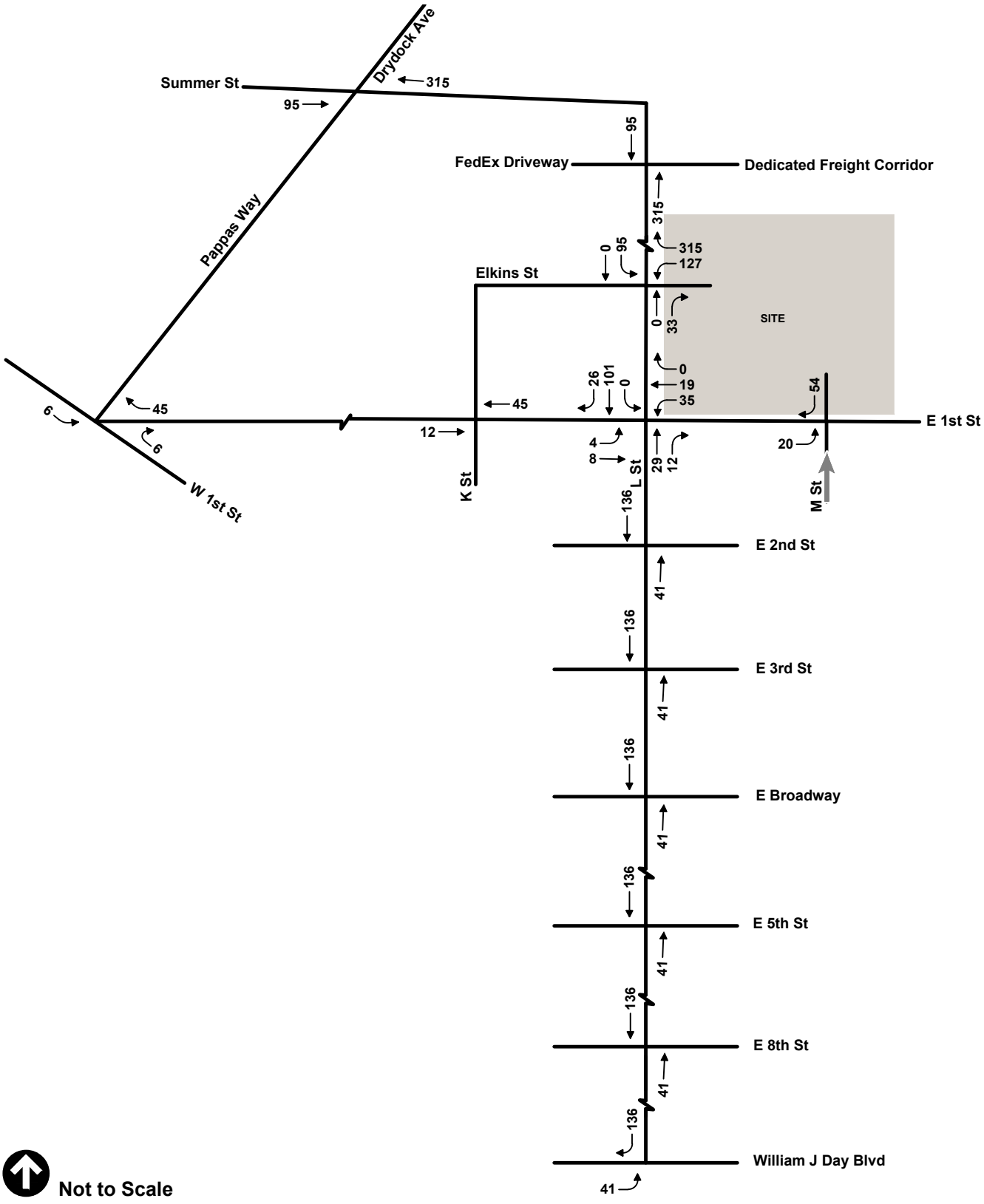
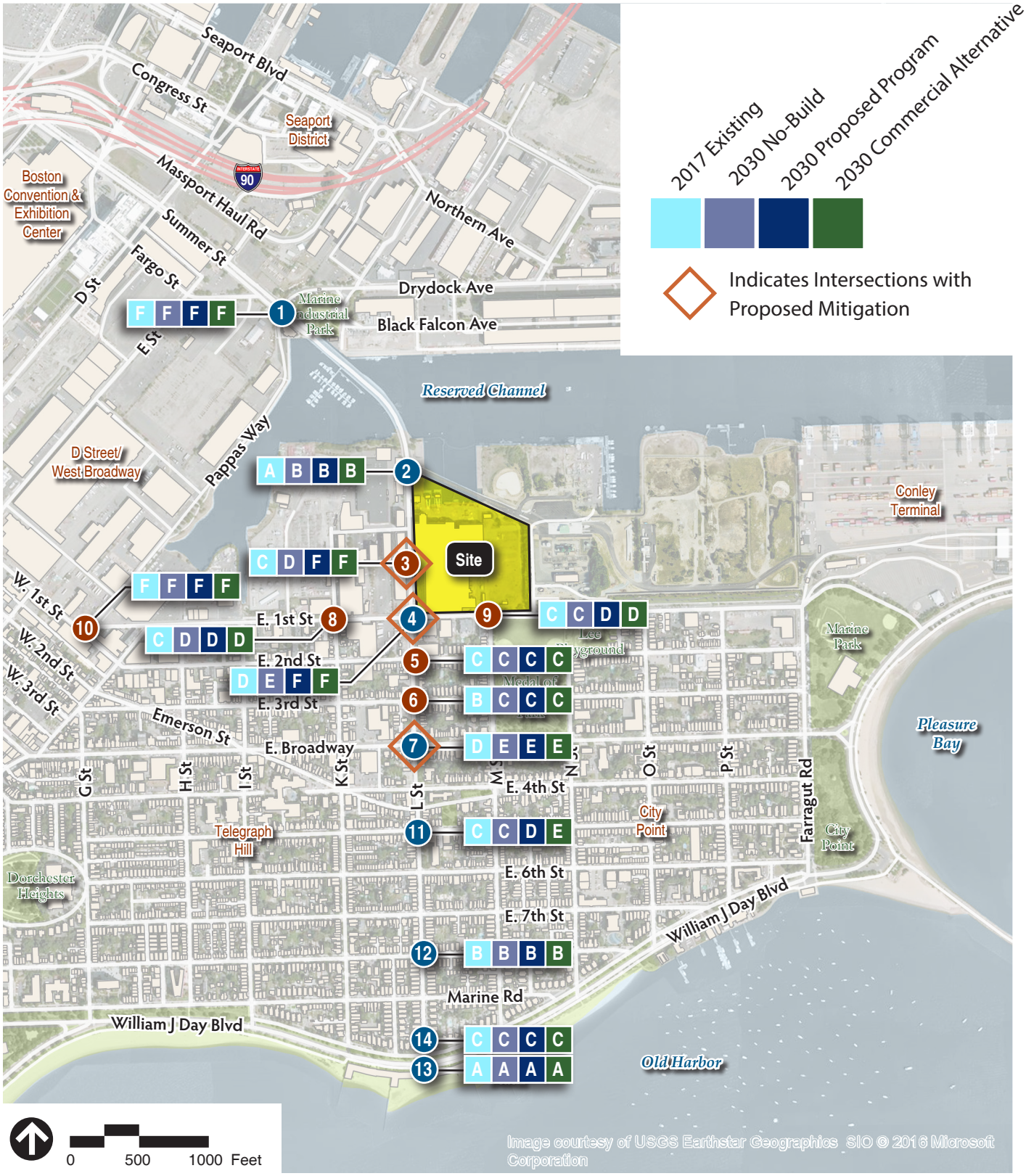


Figure 1.14b

Commercial Alternative Trips
PM Peak Hour (5:00 PM - 6:00 PM)

L Street Station Redevelopment
South Boston, Massachusetts

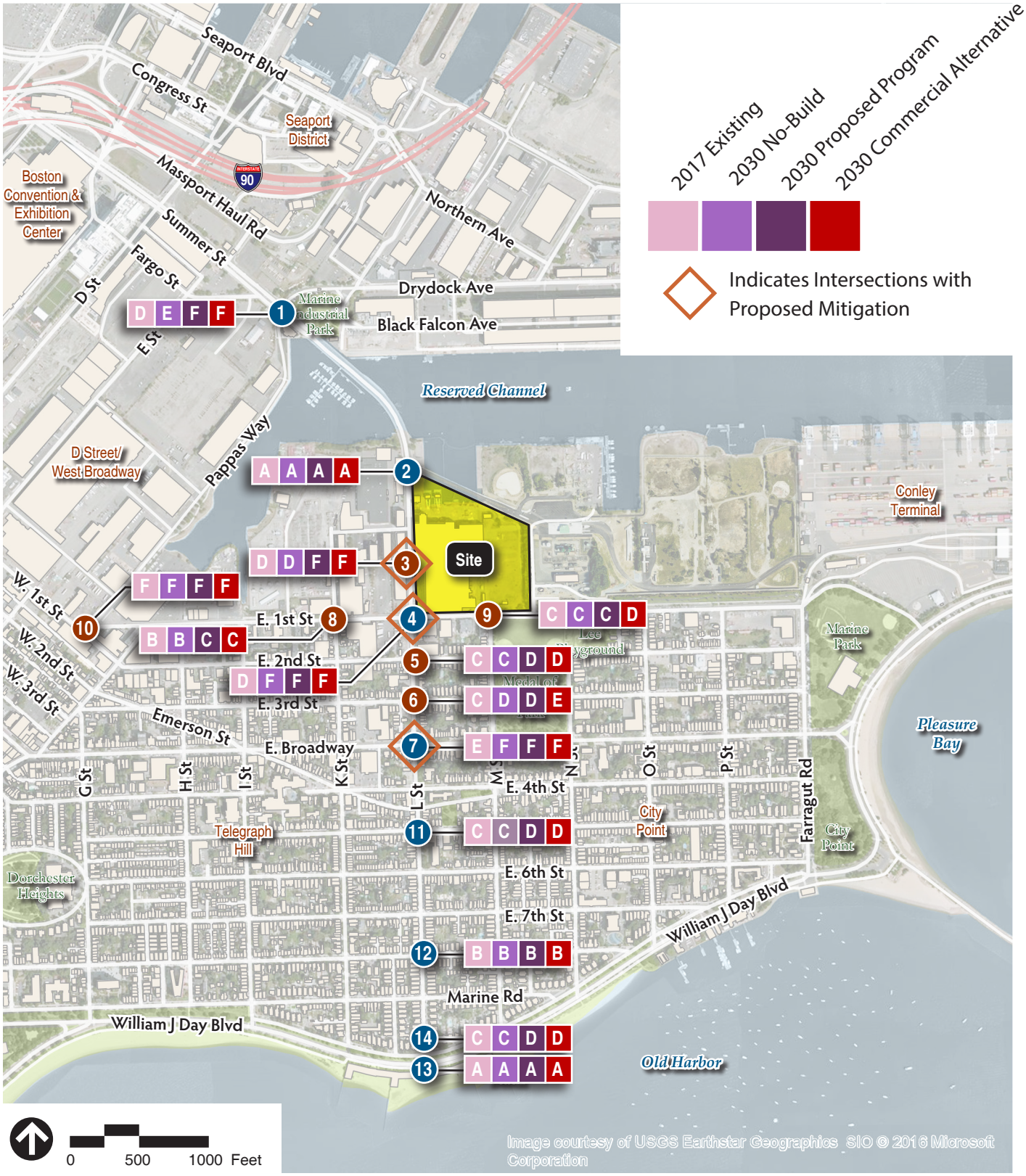


Source: ArcGIS Bing Aerial, MassGIS

Figure 1.15a

2030 Overall Intersection LOS Results
AM Peak Hour

L Street Station Redevelopment
Boston, Massachusetts



Source: ArcGIS Bing Aerial, MassGIS

Figure 1.15b

2030 Overall Intersection LOS Results
PM Peak Hour

L Street Station Redevelopment
Boston, Massachusetts

2

Transportation

This chapter presents the supplemental information requested in regard to the transportation and parking aspects of the Project. Specifically, this evaluation includes updates to the following elements:

- Revision to the Project building program and the resulting impact on traffic, including roadway capacities, parking, transit, pedestrian and bicycle circulation, loading, and overall Project Site conditions.
- Updated transit analysis methodology to align with MBTA's latest Delivery Policy standards.
- A summary of the proposed transportation mitigation and safety improvements that the Project will contribute to the South Boston neighborhood to help reduce Project transportation impacts and improve overall accessibility to and from the area.

Additional detail and supporting information are provided in Appendix C of this SID.

The Project size has been reduced from approximately 1.931 million gross square feet to approximately 1.781 million gross square feet of mixed-use development, inclusive of the rehabilitation of the Turbine Hall and the 1898 Building. The Project continues to propose a mix of uses, including residential, office, hotel, and retail. The mix of residential and commercial uses in the Project has shifted to limit the number of residential units to 750 and increase the square footage of office and research and development space on the site.

The site will benefit from enhanced bus infrastructure and an expanded pedestrian and bicycle network, resulting in a higher proportion of alternative mode trips rather than vehicle trips. The capture of internal trips between different Project uses will continue to support reduced vehicle trip-making and opportunities to control parking demand through parking sharing strategies that take into consideration the needs of different users by time of day.

The Site is set up with three access roads to support the development; one access driveway will be provided off Summer Street near its intersection with Elkins Street, a second driveway will be provided off East 1st Street near its intersection with M Street, and a third driveway is proposed off the Dedicated Freight Corridor to serve service vehicle only. Based on the comments received, the internal site streets have been redesigned to better incorporate bicyclists within the site with designated bicycle lanes on parts of M Street Extension and Elkins Street Extension. The Project will encourage transit, bicycling, as well as walking, as strong alternative transportation modes. The Project continues to include a robust program of

1 Excluding structured parking.

Transportation Demand Management ("TDM") strategies to take full advantage of its mobility options and its synergy with the surrounding neighborhoods.

As a part of the DEIR/DPIR, the existing and future conditions with and without the Project were determined. This SID provides a comparison of the impacts of the modified development program versus the DEIR/DPIR program. Study area intersections are noted in Figure 2.1. The SID also provides description of additional mitigation developed since the DEIR/DPIR.

2.1 Updated Trip Generation

The Project size has been reduced from 1.93 million square feet to 1.78 million square feet of development and the program has shifted development square footage from residential to office and R&D. The updated Project program is summarized in Chapter 1, Table 1-1. The study area is consistent with previously presented information in the DEIR/DPIR filing.

While the development and construction of the full program is expected to take approximately 10 to 15 years, for the purposes of the transportation analysis, a conservative approach was assumed which takes into account full buildout by year 2030.

Resulting project trip generation estimates are presented in Table 2-1 below.

As part of the 2030 Full Build Condition, the Project is expected to generate approximately 350 vehicle trips during the morning peak hour (reduced from 375 vehicle trips in the previous filing) and 410 vehicle trips during the evening peak hour (reduced from 433 vehicle trips in the previous filing). These peak hour vehicle volumes translate to approximately six to seven vehicle trips entering or exiting the Project Site per minute.

The Project-generated vehicle trips are assigned to the study area roadway network, as illustrated in Figures 2.2a and 2.2b, and 2030 Build Condition vehicle volumes are presented in Figures 2.3a and 2.3b.

Table 2-1 Project Generated Trips for 2030 Full Build Condition

	Vehicle			Transit			Walk/Bike/Other		
	In	Out	Total	In	Out	Total	In	Out	Total
AM Peak Hour									
Residential	23	66	89	32	92	124	19	53	72
Retail	6	4	10	21	15	36	21	15	36
Hotel	38	23	61	77	47	124	48	29	77
Office	111	15	126	139	19	158	83	11	94
R&D	50	14	64	62	17	79	37	10	47
Total Trips	**228**	**122**	**350**	**331**	**190**	**521**	**208**	**118**	**326**
PM Peak Hour									
Residential	44	35	79	62	49	111	35	28	63
Retail	24	22	46	86	78	164	86	78	164
Hotel	39	39	78	79	80	159	49	50	99
Office	20	109	129	25	137	162	15	82	97
R&D	11	67	78	14	84	98	9	51	60
Total Trips	**138**	**272**	**410**	**266**	**428**	**694**	**194**	**289**	**483**

2.1.1 2030 Full Build Condition Intersection Operational Analysis

Intersection capacity analyses were conducted for the 2030 Full Build Condition morning and evening peak hours and are presented in Table 2-2 for signalized intersections and Table 2-3 for unsignalized intersections.

Table 2-2 2030 Build Conditions Signalized Intersection Vehicle LOS Morning and Evening Peak Hours

Node/Intersection	AM Peak	PM Peak
1. Summer Street at Drydock Ave/Pappas Way	LOS F	LOS F
2. Summer Street at DFC	LOS B	LOS A
4. Summer Street/L Street at East 1st Street	LOS F*	LOS F*
7. L Street at East Broadway	LOS E*	LOS F*
11. L Street at East 5th Street	LOS D	LOS D
12. L Street at East 8th Street	LOS B	LOS B
14. L Street at William J. Day Boulevard	LOS A	LOS A

Note: Intersection numbers correspond to numbering shown on Figure 2.1.
* Indicates that mitigation is proposed at this location

Table 2-3 2030 Build Conditions Unsignalized Intersection Vehicle LOS Morning and Evening Peak Hours

Node/Intersection	Approach	AM Peak	PM Peak
3. Summer Street at Elkins Street	Elkins Street Eastbound	LOS F*	LOS F*
	Site Driveway Westbound	LOS F*	LOS C*
5. L Street at East 2nd Street	East 2nd Street Eastbound	LOS C	LOS D
	East 2nd Street Westbound	LOS C	LOS C
6. L Street at East 3rd Street	East 3rd Street Eastbound	LOS C	LOS D
	East 3rd Street Westbound	LOS C	LOS C
8. East 1st Street at K Street	K Street Northbound	LOS D	LOS C
	K Street Southbound	LOS B	LOS B
9. East 1st Street at M Street	M Street Northbound	LOS D	LOS C
	Site Driveway Southbound	LOS B	LOS B
10. East 1st Street at West 1st Street/Pappas Way	West 1st Street Northbound	LOS F	LOS C
	Pappas Way Southbound	LOS F	LOS F
13. L Street at Columbia Road	Columbia Road Eastbound	LOS B	LOS D
	Columbia Road Westbound	LOS C	LOS C

Note: Intersection numbers correspond to numbering shown on Figure 2.1.
* Indicates that mitigation is proposed at this location

Based on the foregoing, the 2030 Build Condition for the updated program mix is expected to operate at the same level-of-service as the program previously presented in the DEIR/DPIR.

Intersections denotated with an * in the tables above have been forecasted to decline in operations as a result of the Project-generated trips. To address and minimize these impacts, a "mitigated conditions" analysis was developed to test and consider possible traffic mitigation improvements as potential options for further evaluation in coordination with the BTD.

2.1.2 2030 Full Build Mitigation

The following mitigation commitments address operational deficiencies and reduce delay for both vehicles and pedestrians and improve transit reliability:

- The reconstruction of Summer Street from DFC to East 1st Street
- The reconstruction of East 1st Street from Summer Street to City Point Driveway, including sidewalks and crosswalks.
- Turbine Hall Road Connection
- DFC Service Road Connection
- The signalization and additional improvements at the intersection of Summer Street at Elkins Street
- Crosswalk enhancement at intersection of East 1st Street at M Street
- Signal upgrades at the intersection of Summer Street/L Street at East 1st Street
- Signal upgrades at L Street/East Broadway
- Re-striping of East Broadway westbound, near intersection with L Street

  Communication/connectivity along the Summer Street/L Street corridor between Drydock Avenue and East Broadway

As outlined in the list, the re-constructed intersections will be upgraded to include adaptive signal capabilities, which enable signals to communicate with each other as well as with the City of Boston Traffic Management Center, as required through the City's Smart Utilities Policy. These signals will also be capable of providing transit signal priority. A map highlighting where the traffic signal improvements are anticipated is provided on Figure 2.4.

Adaptive Traffic Signals modify traffic signal cycle lengths and splits based on real time information. The benefit of this technology is that it eliminates lengthy phases with little to no demand and long waits for pedestrians when vehicular demand on a cycle is minimum. The result is a more demand responsive operation where each user (vehicle, cyclist, pedestrian) encounters less delay.

Another feature that will be incorporated at the traffic signals is the capability to prioritize transit vehicles. Transit vehicles can be prioritized by extending green times on the phase the transit vehicle is on or truncating red time on other phases. In addition, at the intersection of L Street and Broadway, an additional westbound travel lane will be provided in order to reduce the delay experiences by transit and other vehicles at that location.

Finally, where possible, the traffic signals in the study area will be modified from providing a long pedestrian wait and then an exclusive pedestrian phase to the City standard of providing a leading pedestrian interval and then concurrent pedestrian phasing. This practice ensures that pedestrians get their fair share of time at the signal and results in lower cycle lengths and delays for all users.

These improvements are projected to improve future transit and other vehicle demand processing more efficiently through the study intersections, as summarized in Table 2-4 below.

Table 2-4 2030 Full Build Mitigated Condition Intersection LOS Morning and Evening Peak Hour

Intersection	AM				PM			
	2017 Existing Condition	2030 No-Build Condition	2030 Full Build Condition	2030 Full Build Mitigated Condition	2017 Existing Condition	2030 No-Build Condition	2030 Full Build Condition	2030 Full Build Mitigated Condition
3. Summer Street at Elkins Street/ Elkins Street Extension	C	D	F	D	D	D	F	D
4. Summer Street/ L Street at East 1st Street	D	E	F	C	D	F	F	C
7. L Street at East Broadway	D	E	E	C	E	F	F	D

Intersections of Summer Street at Elkins Street, Summer Street at East 1st Street and L Street at Broadway are expected to be improved to LOS D or better, with the implementation of the outlined improvement measures. Detailed LOS, delay and queuing by movement is provided in Appendix C.

2.1.3 Traffic Signal Warrants

As part of the DEIR/DPIR, it was determined that a traffic signal would be warranted at the intersection of Summer Street at Elkins Street. This intersection will provide access to the site via Summer Street. The modification of the building program still results in the traffic signal being warranted.

In response to comments from the City of Boston, a Signal Warrant Analysis was also conducted for the intersection of East 1st Street at M Street. The US Department of Transportation's Federal Highway Administration Manual on Uniform Traffic Control Devices ("MUTCD") methodology was used for conducting the traffic analysis.

Table 2-5 shows the results of the signal warrant analysis, while detailed calculation sheets are included in the Appendix C.

Table 2-5 Warrant Analysis Summary for East 1st Street at M Street

Warrant Number	Warrant Met?
Warrant 1, Eight-Hour Vehicular Volume	No
Warrant 2, Four-Hour Vehicular Volume	No
Warrant 3, Peak Hour	No
Warrant 4, Pedestrian Volume	No
Warrant 5, School Crossing	No
Warrant 6, Coordinated Signal System	No
Warrant 7, Crash Experience	No
Warrant 8, Roadway Network	No
Warrant 9, Intersection Near a Grade Crossing	No

Source: Manual on Uniform Traffic Control Devices (MUTCD), 2009 Edition, Chapter 4C.

While a full traffic signal is not warranted for this location, as indicated in Table 2-5, the intersection will be enhanced with a Rectangular Rapid Flashing Beacon (RRFB) to alert drivers to slow down and enhance and improve safety at the crosswalks for pedestrians and bicyclists.

2.1.4 Loading, Service and Deliveries

Truck Loading

Truck loading is proposed to take place at various locations internal to the Project Site. All loading is expected to take place within designated docks and areas to minimize truck idling on the internal roadways. Residential move-in and move-out will be scheduled to create an organized flow of residents and moving trucks to and from the Project Site. Truck loading is not proposed to occur anywhere on East 1st Street or Summer Street. With the proposed project change, the number of loadings docks on M Street Extension has been reduced, and a service road/alley is now proposed to run behind buildings F and H, and in between buildings A and F.

The team will continue to accommodate loading and servicing in a way that minimizes impacts to site users, including drivers, pedestrians, and bicyclists. As individual buildings are further designed, the Proponent will continue to coordinate with City staff on design details.

2.2 Vehicle Parking

2.2.1 Project Vehicle Parking Supply

With the modified development program in place, the Project proposes to provide up to 1,214 parking spaces within the Project Site. The parking is proposed to be allocated to the individual uses based on the ratios displayed in Table 2-6, with some uses sharing parking. This parking analysis is based on the 1.78 million square feet of development program as described in Chapter 1, *Project Description and Supplemental Information*.

Table 2-6 Project Parking Summary

Land Use	Program	Parking Ratio	Daytime Parking Supply	Nighttime Parking Supply
Residential Condos	386 units	1.00 per unit	386	386
Residential Apartments	364 units	0.50-1.00 per unit	182	364
Retail	81 ksf	0.20-0.50 per ksf	16	41
Hotel	344 keys	0.32-0.50 per key	110	172
Office	330 ksf	0.65 per ksf	214	0
R&D	470 ksf	0.65 per ksf	306	0
Community Parking			0	120
Total Spaces			**1,214 spaces**	**1,083 spaces**

The Project will seek to reduce dependence on auto travel and will implement a comprehensive package of Transportation Demand Management (TDM) strategies to reduce auto trip and parking demand. Parking will be provided at each block for the various land uses, and it is also intended that the Project will share parking between uses. During the early phases of the Project, it is anticipated that the structured parking constructed in the residential buildings will be supplemented with temporary surface parking to maintain the parking ratios described above.

As outlined in the DEIR/DPIR, the Project proposes to implement a shared parking strategy between its commercial and residential components. Implementing a shared parking philosophy within the garages allows the project to limit the overall number of parking spaces to be built. It is anticipated that the demand for parking spaces, primarily through reduced vehicle ownership by residents and employees using alternatives to commute by private vehicle, will continue the downward City trend with changing travel behaviors and increased access to transportation network companies ("TNC's") such as Lyft and Uber, car sharing services such as Zip-Car, and autonomous vehicles, as well as increased availability of alternative travel mode services and infrastructure, such as bicycle lanes and improved sidewalks.

2.2.2 Project Parking Demand

The dynamic of parking supply to meet demand in an urban location presents certain challenges because available methodologies are generally based on data from situations where there is low transit availability and limited alternative mode choice. Further, they do not reflect the goals of minimizing auto use by not providing unlimited supply to satisfy demand, as reflected in the restrictive zoning requirements and goals of the City of Boston to reduce the number of parking spaces required for development.

For the DEIR/DPIR, a detailed parking demand analysis was conducted using different methodologies (Institute of Transportation Engineers, Urban Land Institute). In order to confirm that the parking supply is in line with the City's goals for this area, other parking rate sources were reviewed.

For comparison purposes, recently proposed developments in South Boston, the Seaport, and other dense Boston neighborhoods that are served by bus transit, bicycling, and transit were reviewed to determine appropriate parking rates. Review of these developments reveals an average parking rate for residential uses of less than one space per unit (average 0.94 space/unit), a hotel rate of 0.33 space/unit, and a research and development rate of 0.36 space/unit.

Recent projects in these areas did not typically include office space, however, office space in the downtown and in the seaport typically included parking rates ranging from 0.5 to 1.5 spaces per thousand square feet. As shown, the shift in square footage from residential to office and research and development space will result in less demand at the times of day that are critical to area residents. A summary of the rates and the resulting expected parking demand is provided in Table 2-7.

Table 2-7 Unshared Project Parking Demand based on Other Projects

Land Use	Program[1]	Parking Ratio	Parking Demand
Residential Condos	386 units	0.94 per unit	363
Residential Apartments	364 units	0.94 per unit	342
Retail	81 ksf	0.20 per ksf	16
Hotel	344 keys	0.33 per key	114
Office	330 ksf	1.00 per ksf	330
R&D	470 ksf	0.36 per ksf	169
Total Spaces			**1,334 spaces**

As discussed above, the Project proposes to implement a shared parking strategy between the office, retail, hotel and residential components of the development. A shared parking analysis was conducted following the temporal variations, or hourly parking demand variations, provided in the Urban Land Institute's (ULI) Shared Parking report, second edition (latest available report published in 2005).

The concept of shared parking recognizes that peaking for different land uses occurs at different times. For example, the office demand peaks during the middle of the work day when most employees are at work and residential demand peaks overnight when most residents are home. So, instead of building sufficient parking to support each individual land use's peak demand, the site supplies enough parking to support the entire site's peak, assuming that each land use will draw from a common parking supply.

Table 2-8 shows the shared parking demand for the Project at 8:00 AM, 2:00 PM, 5:00 PM, and 10:00 PM.

Table 2-8 ULI Parking Generation Estimate

Land Use	Unshared Demand	Shared Parking Demand (8AM)	Shared Parking Demand (2PM)	Shared Parking Demand (5PM)	Shared Parking Demand (10PM)
Residential[1]	705	599	494	599	705
Retail	16	5	13	12	5
Hotel	114	103	91	91	91
Office	330	243	323	162	3
Research & Development	169	127	169	85	2
Total Spaces	**1,334**	**1,077**	**1,090**	**949**	**806**

1 Includes condominium and rental units

As shown above, with a shared parking program in place, the Project provided 1,214 parking spaces are sufficient to satisfy its peak demand of 1,090 spaces during a typical day. During the evening hours, when residential parking is peaking, there is an excess of over 400 parking spaces provided.

2.2.3 Parking Management Strategy

The Project proposes to implement a shared parking strategy between its commercial and residential components. Implementing a shared parking philosophy within the garage allows the Project to limit the need to build more parking spaces than are needed.

The Project will also contain additional at-grade residential parking as development progresses, as additional protection for the neighborhood during the development period. In addition, as the site is developed, the parking needs will continually be evaluated to ensure the parking supply is appropriate for the parking demand.

Opportunity for Community Parking

In response to community concerns about the current unavailability of resident parking in the City Point neighborhood, the Proponent will provide an opportunity for additional night and weekend parking for neighborhood residents on the site at a discounted rate. This parking will be made available in at-grade parking areas as development progresses and within commercial parking structures as the Project is built out. The Proponent commits that 120 spaces will be made available on this basis.

2.2.4 Electric Vehicle Charging Stations

The Project's garages will initially provide fast EV charging stations for five percent of the total spaces with an additional ten percent equipped to be converted into EV spaces. This equates to up to 61 EV spaces with up to an additional 122 spaces to be EV-ready. The garages are being designed to allow this number to expand as the demand increases over time.

2.3 Transit Analysis

The comments received from the City and the MBTA requested that the transit analysis section be revised to use a passenger comfort standard for the percent of passenger travel time experienced in comfortable conditions for existing condition consistent with the MBTA's Service Delivery Policy. The Project has revised the Transit Analysis accordingly. In addition, as requested, the Project has provided a trip level crowding analysis to determine the number of busses and passengers expected to be over passenger crowding thresholds in the Existing, No Build, and Build conditions (both in expected conditions and with the aspirational transit percentage goals for the area).

2.3.1 Existing Public Transit

The MBTA currently provides local bus service within a quarter mile of the Project Site via five bus routes: Routes 5, 7, 9, 10, and 11 (as shown in Figure 2.5). Table 2-9 provides a summary of these MBTA local bus services, which are described in detail below. The Red Line services South Station, Broadway Station, and Andrew Station, each over one mile away from the Project site.

Table 2-9 MBTA Bus Services in the Study Area

MBTA Service	Origin/Destination	Peak Hour Frequency (Minutes)	Closest Stop (distance in miles)
Bus Route 5	City Point – McCormack Housing	60 [1]	E. Broadway @ L Street (0.20)
Bus Route 7	City Point – Otis and Summer Streets	1-12	Summer Street @ E. 1st Street (0.00)
Bus Route 9	City Point – Copley Square	5-15	E. Broadway @ L Street (0.20)
Bus Route 10	City Point – Copley Square	5-35	E. Broadway @ L Street (0.20)
Bus Route 11	City Point – Downtown	6-15	City Point Bus Terminal (0.20)

Source: MBTA, winter 2019 schedule
1 Peak hours not serviced

A total of 626 weekday daily bus trips serve the project area, according to data summarized in MBTA Better Bus Project bus profiles.

Route # 5 – City Point – McCormack Housing – This route connects City Point in South Boston to McCormack Housing via Andrew Station in South Boston. It is a community route with limited service hours and frequency that runs along much of the same route alignment as Route 10. The closest stop to the Project site is at East Broadway and L Street, less than a quarter of a mile to the south. On weekdays, Route 5 operates from 9:05am-3:24pm with 60-minute headways. On Saturdays, it operates from 10:05am-3:24pm with 60-minute headways. Route 5 does not operate on Sundays. The Route 5 bus service will be discontinued in the Fall 2019, as part of the Better Bus service improvements.

Route #7 – City Point – Otis and Summer Streets – This route connects City Point in South Boston to Downtown Boston at Otis Street and Summer Street. The closest stop to the Project site is at Summer Street (in South Boston) and East 1st Street on the southwestern corner of the Project site. On weekdays, Route 7 operates from 5:15am-10:33pm with 3- to 7-minute headways during the peak hours. On Saturdays, the span of service is virtually the same, ending two minutes earlier. Route 7 does not operate on Sundays.

Route #9 – City Point – Copley Square – This route connects City Point in South Boston to Copley Square via Berkeley Street and Herald Street. The closest stop to the Project site is at E. Broadway and L Street, less than a quarter of a mile to the south. On weekdays, Route 9 operates from 5:13am-1:13am with 5- to 15-minute headways during the peak hours. On weekends, bus service is provided from 5:10am-1:14am on Saturdays and from 6:00am-1:12am on Sundays.

Route #10 – City Point – Copley Square – This route connects City Point in South Boston to the South End and Copley Square via Massachusetts Avenue and Dartmouth Street. The closest stop to the Project site is at E. Broadway and L Street, less than a quarter of a mile to the south. On weekdays, Route 10 operates from 4:55am-1:31am with 5- to 35-minute headways during the peak hours. On weekends, it operates from 6:15am-1:14am on Saturdays, and from 6:00am-1:11am on Sundays.

Route #11 – City Point – Downtown – This route connects City Point in South Boston to Downtown Boston via Chinatown, Tufts Medical Center, Broadway, East 8th Street and A Street. The closest stop to the Project is at City Point, less than a quarter of a mile to the east. On weekdays, service is provided from 5:11am-1:24am with 6- to 15-minute headways during the peak hours. On weekends, service is provided from 5:10am-1:20am on Saturdays and from 6:15am-1:28am on Sundays.

2.3.2 Public Transit Existing Conditions: Bus Crowding Analysis

Passenger Comfort Metric

The MBTA Service Delivery Policy ("SDP") defines a passenger comfort standard for the percent of passenger travel time experienced in comfortable conditions, with a minimum of 92 percent and target of 96 percent of bus passenger minutes in comfortable conditions.[2]

Table 2-10 summarizes the existing conditions by route, including an assessment of each route's passenger comfort metric and existing trip-level passenger crowding. Per MBTA guidance, the SDP comfort metric is reported only for the Existing Condition.

Both bus Route 7 and Route 9 fall below the MBTA's minimum of 92 percent of bus passenger minutes in comfortable conditions, while Route 11 attains a comfort metric greater than the 92 percent minimum comfort standard but less than the 96 percent target.

In addition to the comfort metric, the MBTA requests an analysis of average (typical) weekday bus passenger loads (to compare against a crowding threshold) at a trip level. This analysis is conducted for both Existing and future No-Build and future Build conditions.

Existing (Current) Conditions Trip Level Crowding (Passenger Loads)

This analysis examines the maximum average passenger load for each bus trip, based on existing conditions MBTA data that constitute a 2017 composite of weekday bus passenger loads for the routes that operate within one-quarter mile of the Project site. *(The 2018 composite bus data was not available at the time of the analysis.)* The analysis compares the maximum average loads to policy capacity (bus crowding threshold) for each trip throughout an average (typical) weekday. The buses serving the routes in the study area have a seated capacity of 38 passengers and, applying the vehicle load standard dictated by MBTA Service Delivery Policy,[3] have an average policy capacity equal to 53 passengers during the peak service periods and equal to 47 passengers during off-peak periods.[4]

2 MBTA, *Service Delivery Policy, 2017 Update*. (Table 11, p. 27, Passenger Comfort Standard Targets and Performance.)

3 MBTA, Service Delivery Policy, 2017 Update.

4 MBTA, Average Fleet Seating – CY2017. Note that the capacities displayed are rounded down to the nearest whole number and maximum loads displayed are rounded to the nearest whole number. All calculations (including sums) do not round, so maximum loads may differ from the numbers displayed.

For the bus trip segments analyzed,[5] only a single trip—an early morning route variant (an exception to the standard operation) of the Route 9 bus service that serves Boston Latin/Longwood6—experiences an average passenger load that exceeds the crowding threshold. For all other bus trips that serve the Project site in either direction, no other trips currently exceed policy capacity; in other words, the average passenger loads fall below the threshold for bus passenger crowding.

Field Observations

Based on field observations and anecdotal references from South Boston residents, there is general agreement that the buses do not run on schedule, particularly during peak periods of service, because of congested traffic conditions along the bus routes. These traffic delays cause buses to "bunch," a result of being unable to maintain even headways between trip runs. As a result, passenger loads for trips (particularly in the peak periods) do often exceed crowding conditions. These are generally not reflected in the composite day data. Improvements on the roadways and to traffic signals that are able to increase bus trip reliability should have a positive effect in reducing the bus bunching phenomenon, resulting in reduced passenger crowding.

Table 2-10 Route Level Summary of Passenger Comfort and Crowding (Existing/Baseline)

Route	Inbound / Outbound	MBTA's Target Passenger Comfort Metric	Actual 2017 Passenger Comfort Metric	Bus Trips Serving Project Site	Bus Stop Nearest Project Site[1]	Bus Trips in Excess of Crowding Threshold	Total Passengers in Excess of Crowding Threshold
Route 5	IB	92% - 96%	100%	7	E. Broadway @ L St		
	OB	92% - 96%	100%	6	E. Broadway @ L St		
Route 7	IB	92% - 96%	82.2%	104	Summer St @ E. 1st St		
	OB	92% - 96%	82.2%	89	Summer St @ E. 1st St		
Route 9	IB	92% - 96%	85.6%	99	E. Broadway @ L St	1 see note	4
	OB	92% - 96%	85.6%	97	E. Broadway @ L St		
Route 10	IB	92% - 96%	99.4%	42	E. Broadway @ L St		
	OB	92% - 96%	99.4%	46	E. Broadway @ L St		
Route 11	IB	92% - 96%	93.9%	73	City Point		
	OB	92% - 96%	93.9%	63	City Point		
Total				**626**		**1**	**4**

1 Route 5, 7, 9, and 10 passenger revenue service is also provided at the City Point Bus Terminal; this stop is also an option for passengers from the proposed project site.

Sources: MBTA Service Delivery Policy Comfort Metric Data, Fall 2017; MBTA Ridership Data, Fall 2017; MBTA, Service Delivery Policy, 2017 Update, Approved January 23, 2017; and MBTA, Average Fleet Seating – CY2017.

Note: The single trip in which crowding exceeds the threshold occurs on the trip variant, Kenmore via Boston Latin, a single, early AM trip - No crowding threshold exceedance occurs on the trip segment between Broadway and City Point stops, nor on the trip segment between the Back Bay and Broadway stops

5 Per MBTA guidance, the analysis segments for bus trips include all upstream stops on the route segment that begin at the previous rapid transit stop served, or else the start of bus trip, and all downstream stops on the route segment until the next rapid transit stop, or else the end of the bus trip.

6 Pattern 9.4 makes one early morning trip that operates beyond Copley Square to Kenmore Station to serve school trips. Most Route 9 trips on weekdays and all trips on weekends run the full route from City Point to Copley Square via Broadway Station (Pattern 9.0).

2.3.3 Public Transit Future Conditions: Bus Crowding Analysis

To determine the potential impact of the Project on bus passenger crowding, the analysis consists of estimating bus passenger loads by weekday trip for a future 2030 No-Build condition and future 2030 Build condition, which are then compared against the MBTA's bus crowding threshold. The analysis assumes that all Project-generated trips will travel through the peak load point of the bus segment analysis: between the Project site's bus stop and the previous (or next) rapid transit stop served by the bus, or else the start (or end) of bus trip.

This transit analysis for the Project focused on an assessment of MBTA Bus Routes 7, 9, 10, and 11. MBTA Bus Route 5 was omitted from the study because the service will be discontinued beginning in the Fall 2019, as part of the Better Bus project service adjustments.

Background Growth in Ridership

To estimate the growth in background ridership between existing conditions and the future No-Build conditions, an estimated average annual growth rate of 0.68 percent was applied to existing MBTA bus ridership. The growth rate is based on system-wide MBTA growth projections for local buses prepared by CTPS for the Boston Metropolitan Planning Organization's Long-Range Transportation Plan, Charting Progress to 2040. This establishes a future base condition to compare against the Project's Build condition and its expected additional transit riders.

To analyze the Study Area bus route passenger demand and bus capacity for the 2030 No-Build condition, the annual growth increase was applied to all maximum passenger loads in the Fall 2017 MBTA bus passenger loads data for a typical day composite trip. The analysis then compares the 2030 No Build passenger loads to policy capacity for each bus trip throughout an average (typical) weekday.

Project-Generated Transit Trips

The Project-generated trips were estimated using the methods outlined in the DEIR/DPIR and the modal trip activity for the AM and PM peak hours were generated. The peak hour trips were then used to estimate the daily transit ridership, using a factor based on the observed peak hour of passenger activity for each bus route. The daily transit trips are then distributed throughout the bus service period based on the actual passenger boarding distribution for the bus area's bus routes, to approximate trips to and from the Project site, based on land use.

The bus crowding analysis was performed using two different assumptions for transit mode share:

1. expected project mode shares (ranging from 37 to 42 percent, depending on land use) for the peak hours, as presented in the DEIR/DPIR, and
2. an aspirational mode share reflecting the City of Boston's GoBoston 2030 goal to increase transit mode share; in this study area, that mode share is 49 percent, applied to the peak hours of trip generation.

The Project generated bus transit trips are distributed throughout the service day and added to each of the bus trip passenger loads under the No Build condition to determine the 2030 Build condition.

These daily transit trips were distributed and averaged to 30 minute time periods throughout the day based on the combined existing inbound and outbound bus trip passenger load distribution for each bus route. This intra-day distribution was used to reflect the transit demand the Project is anticipated to generate throughout the day compared to existing demand.

Projected transit ridership was assigned to each bus route and direction based on existing trip patterns during peak periods, as shown in Table 2-11). Route 5 was not assigned new passenger demand because the service will be discontinued in the Fall 2019 (in the study area, the Route 10 provides more frequent service along the same route alignment).

Table 2-11 Transit Trip Distribution Among Study Area Bus Routes (Future Condition)

		AM Peak Hour		PM Peak Hour	
Route	**Direction**	**% In**	**% Out**	**% In**	**% Out**
Bus 5	Inbound	n/a	n/a	n/a	n/a
	Outbound	n/a	n/a	n/a	n/a
Bus 7	Inbound	–	67%	–	48%
	Outbound	46%	–	70%	
Bus 9	Inbound	–	25%	–	37%
	Outbound	33%	–	21%	–
Bus 10	Inbound	–	7%	–	13%
	Outbound	20%	–	9%	–
Bus 11	Inbound	–	0%	–	2%
	Outbound	2%	–	0%	–
Total		**100%**	**100%**	**100%**	**100%**

Because the Project has residential, office, hotel, and retail uses on site, the transit trips during the peak periods are traveling both to and from the site. For example, during the morning commuting hours, residents will travel away from the site and employees will travel to the site. This mix of uses helps to balance the demands on the bus networks surrounding the Project Site. Most of the Project-generated transit ridership is projected to use Route 7 and Route 9, and to a lesser extent, Route 10.

Results: Future No-Build

Under 2030 No-Build conditions, study area bus Routes 7 and 9 are projected to have maximum loads that exceed the MBTA's policy capacity due to additional, non-Project related trips. A total of 7 bus trips in a typical weekday could experience crowding levels above the threshold.

Results: Future Build (Two Conditions)

Table 2-12 compares two future build conditions. The first describes bus transit trip impacts assuming the share of transit users at the Project site follows the City of Boston's aspirational, higher mode share of transit users. The second condition describes bus transit trip impacts assuming the expected share of transit users around the Project site.

The Project results in new bus trips on each bus route that exceed the MBTA's policy for bus passenger loads, as summarized in Table 2-12. The largest exceedances are on Route 7 and Route 9, and much smaller exceedances are on Route 10 and Route 11.

- On Route 7, Build conditions may result in 13-14 bus trips (out of total 193 bus trips in both directions or approximately 7 percent of trips) with passenger crowding levels over the threshold, with an average of 5-6 passengers per bus experiencing the crowded condition. Over the day's service period, this results in approximately 138-163 passengers daily on buses with crowding levels over the comfort threshold on Route 7.
- On Route 9, Build conditions may result in 19-20 bus trips (out of total 196 bus trips in both directions or approximately 10 percent of trips) with passenger crowding levels over the threshold, with an average of 7-8 passengers per bus experiencing the crowded condition. This results in approximately 260-300 passengers daily on buses over the comfort threshold on Route 9 trips.
- On Route 10 and Route 11, Build conditions may result in approximately 5 bus trips (out of total 136 bus trips in both directions or approximately 4 percent of trips) with passenger crowding levels over the threshold, with an average of 1-3 passengers per bus experiencing the crowded condition. This results in approximately 7-13 passengers daily on busses over the comfort threshold on Route 10 and 11, combined.

Improvements on the roadways and to traffic signals that are able to increase bus trip reliability should have a positive effect in reducing the bus bunching phenomenon, resulting in reduced passenger crowding.

Table 2-12 Route Level Summary of Passenger Crowding

Route	Existing (Baseline)			2030 No Build		2030 Build *Applying City of Boston Aspirational Transit Mode Share*		2030 Build *Expected Project Transit Person Trip Generation*	
	Number of Bus Trips Servicing the Site	Number of Trips Exceeding Threshold	Total Passengers Over Threshold	Number of Bus Trips Exceeding Threshold	Total Passengers Over Threshold	Number of Bus Trips Exceeding Threshold	Total Passengers Over Threshold	Number of Bus Trips Exceeding Threshold	Total Passengers Over Threshold
Route 5 IB	7	0	0						
Route 5 OB	6	0	0						
Avg # of passengers per bus exceeding the threshold			*0*						
Route 7 IB	104	0	0	2	4	14	93	14	81
Route 7 OB	89	0	0	0	0	13	71	13	57
Avg # of passengers per bus exceeding the threshold			*0*	-	*2*	-	*6*	-	5
Route 9 IB	99	1	4	3	10	19	143	19	125
Route 9 OB	97	0	0	2	1	20	157	20	134
Avg # of passengers per bus exceeding the threshold			*4*	-	*2*	-	*8*	-	7
Route 10 IB	42	0	0	0	0	3	9	3	5
Route 10 OB	46	0	0	0	0	1	3	1	1
Avg # of passengers per bus exceeding the threshold			*0*	-	*0*	-	*3*	-	2
Route 11 IB	73	0	0	0	0	1	1	1	1
Route 11 OB	63	0	0	0	0	0	0	0	0
Avg # of passengers per bus exceeding the threshold			*0*	-	*0*	-	*1*	-	1
Total 626 bus trips servicing the site									

Note: Bus routes traveling from South Boston to Downtown / Back Bay / Red Line are considered "Inbound" (IB) routes, while bus routes traveling from Downtown / Back Bay / Red Line to City Point are considered "Outbound" (OB) routes.

2.4 Bicycle Analysis

2.4.1 Bicycle Conditions

In the vicinity of the Project Site, bicycle accommodations are provided within Thomas J. Butler Park, along the northern side of East 1st Street. The Project will incorporate bicycle accommodations in compliance with BTD's Guidelines to encourage bicycling, as well as walking, as strong transportation modes to and from the Site. Since the DEIR/DPIR, the Project has investigated additional options to improve the cyclist experience.

2.4.2 Shared Bicycle Stations

The closest BlueBike station (formerly known as Hubway) is located approximately 0.25 mile southwest of the Site at the South Boston Library with a second station within 1 mile east of the Site at the William J Day Boulevard at Murphy Skating Rink.

As part of the Project, the Proponent will install three BlueBike stations on-site in highly visible locations such as near bus stops and Mobility/MicroHubs (two proposed on Summer Street and one proposed on East 1st Street near City Point), with an option to install a fourth BlueBike station, if enough demand, to serve Project site residents, employees, visitors and the wider community. Final station locations will be defined in coordination with City's BlueBike coordinator and will depend on availability of appropriate sun exposure, as stations are solar powered.

2.4.3 Project Bicycle Parking

The Project will provide a variety of bicycle parking options for employees, residents, and visitors of the Project, as required by the Boston Transportation Department Bicycle Parking Guidelines.

Approximately 230 short-term, outdoor bicycle parking spaces and 1,066 long-term, secured/covered bicycle parking spaces are proposed as part of the Project. The bicycle parking spaces for both short-term and long-term per land use are shown in Table 2-13.

Table 2-13 Bicycle Parking Summary

Land Use	Bicycle Parking Ratio[1]	Number of Spaces
Residential – Secured/Covered	1 per unit	750
Residential – Outdoor	1 per 5 units	150
Retail – Secured/Covered	0.3 spaces per ksf	24
Retail – Outdoor	1 per 5 ksf	16 [2]
Hotel – Secured/Covered	0.3 spaces per ksf	52
Hotel – Outdoor	no fewer than 4	4
Office – Secured/Covered	0.3 spaces per ksf	99
Office – Outdoor	1 per 2.5% daily users of building	25 [3]
R&D – Secured/Covered	0.3 spaces per ksf	141 [4]
R&D – Outdoor	1 per 2.5% daily users of building	35 [3,4]
Total Secured/Covered		**1,066 spaces**
Total Outdoor		**230 spaces**

1 Source: Boston Transportation Department, Boston Bikes: Bicycle Parking Guidelines
2 Criteria require outdoor parking space for patrons and visitors per 5 ksf. Smaller retail square footage is accommodated in bicycle parking for other uses
3 Criteria require outdoor parking space for patrons and visitors for 2.5% of estimate daily users (corresponds to one quarter of the 10% rate for indoor)
4 Note that R&D does not have a rate in the Guidelines. Rate for Office was used for these calculations

2.4.4 Future Bicycle Infrastructure

Bicycle infrastructure improvements are planned to be implemented along the site frontage and internal roadways. As outlined in the DEIR/DPIR, the Project proposes a redesign of the section of Summer Street from East 1st Street to the DFC to accommodate vehicles and separated bike lanes along Summer Street. At the intersection of Summer Street at Elkins Street, two stage bike boxes will be provided to facilitate the movement between the streets. At the intersection of Summer Street at East 1st Street, striping and two stage bike boxes will ensure passage for cyclists through the intersection.

Since preparation of the DEIR/DPIR, further investigation has been made into the improvements along East 1st Street. The proposed design now includes on street bike lanes where possible and only relies on sharrows in a single direction in sections where the available width precludes bike lanes (along the historic frontage of building T3). However, the bicycle accommodations for those westbound travelers are accommodated via bike lanes on a parallel, lower volume route within the site as described below.

Because the route between points north on Summer Street and points to the east on East 1st Street is expected to receive high bicyclist demand, and the historic frontage of building T3 does not allow for a space delineated for cyclists in that section between M Street and Summer Street, the Project has provided improved bicycle accommodations through the site to accommodate travelers between East 1st Street

and Summer Street. Bicycle lanes will be provided in both directions on both M Street and Elkins Street. With lower volumes and bike lanes, the cyclist experience will be more comfortable than traveling through the intersection of Summer and East 1st Street.

In order to encourage both residents and employees at the site as well as residents and employees already located near the site to use this bicycling infrastructure, the Project proposes to install three new BlueBike stations at key points on the site. Bike racks will also be provided at key locations (such as near bus stops) for ease of transfer between alternative modes.

The Proponent will continue to work with the City to implement the bicycle infrastructure improvements described herein and others as the City formulates its long-term plans for bicycle improvements for the area.

Figure 2.6 shows bicycle and pedestrian connections to the site and future improvements that will be made both by the Proponent and others.

2.4.5 Bicycle Level of Comfort Analysis

Bicyclists have varying levels of comfort depending on the volume, speed and proximity of adjacent traffic. The level of comfort scale used vary from either level 1 to level 4 or level 1 to level 5. Level 1 represents high comfort for users from 8 to 80 and the highest level (level 4 or 5 depending on the scale chosen) represents low comfort which is intolerable even for most experienced adults, often perceived as unrideable. The City of Cambridge, Massachusetts, uses a scale of 1 (high comfort) to 5 (low comfort) and that scale was used for this analysis.

The level of comfort that cyclists experience on the roadways near the site as they are currently configured and as they will be configured as a result of the roadway improvements were evaluated and are presented in Table 2-14 below. As shown, in the study area, East 1st Street is currently at a comfort level of 3 but will typically improve to level 1 and 2. Summer Street currently has a comfort level of 5 and will improve to level 2 and 3.

Table 2-14 Bicycle Level of Comfort Analysis

		Bicycle Comfort Level	
Roadway	**Segment**	**Existing Conditions**	**Proposed Conditions**
Summer Street	Project Limit to Elkins Street	5	3
	Elkins Street to East 1st Street	5	2
East 1st Street	Summer Street to M Street	3	2
	M Street to Project Limit	3	1
Elkins Street (Internal Project Street)	Summer Street to M Street	n/a	3
M Street	East 1st Street to Elkins Street	n/a	2
(Internal Project Street)	Elkins Street to Project Limit	n/a	3

Note: Scale is from 1 to 5 (1 = Comfortable for All Users, 5 = Intolerable for All Users)

2.5 Future Pedestrian Facilities / Infrastructure

The Project Site is bounded by existing sidewalks that are proposed to be widened as part of the Project. The Project's building massing is proposed to be set back from the roadway to provide additional sidewalk and streetscape dimensions. The widening of sidewalks will improve pedestrian conditions in the area both on Summer Street and on East 1st Street. The Project is widening the sidewalk on both sides of East 1st Street to provide for a more comfortable pedestrian environment. The southern sidewalk widening will extend beyond project limits and cover improvements to Acadia Street, east of the Site.

The pedestrian improvements will be a substantial design and functional upgrade to the Project Site and provide a number of benefits to both the immediate neighborhood and the City of Boston.

In addition to the pedestrian improvements along the site frontage, as a part of traffic signal timing improvements at off-site intersections, the pedestrian experience will be improved through reduction of wait times for pedestrian walk indications. Figure 2.6 shows bicycle and pedestrian connections to the site and future improvements that will be made both by the Proponent and others.

2.6 Transportation Mitigation Measures

2.6.1 Phasing of Proposed Physical and Operational Improvements

As previously discussed, the Project proposes certain physical and operational transportation improvements to mitigate the transportation related Project impacts. These mitigation measures include the following:

- Creation of a new four-leg intersection with new traffic signals at Summer Street at Elkins Street Extension. The intersection will accommodate adaptive signalization, connectivity, transit priority, and more efficient pedestrian walk time distribution. ADA accessible ramps will be provided at all four corners in addition to crosswalks and bicycle appropriate striping.
- Creation of a new four-leg intersection at East 1st Street and M Street Extension. The intersection will accommodate vehicles, bicyclists, and pedestrians with ADA accessible ramps at all four corners, crosswalks and bicycle striping will also be included. The intersection will be enhanced with a Rectangular Rapid Flashing Beacon (RRFB) to alert drivers to slow down and enhance and improve safety at the crosswalks for pedestrians and bicyclists.
- Creation of a new access point from the Project site to Conley's Dedicated Freight Corridor, to be used for commercial/service truck access only which would limit truck activity on Summer Street and East 1st Street.
- Construction of internal roadways in line with City standards, that accommodate vehicles, bicyclists and pedestrians. The additional roadways will break up the

parcel and provide more travel route opportunities for both site users and the community and make it possible to access the waterfront.

- **Traffic / Ped / Bike Improvement –** Re-construction of Summer Street along property boundary (between DFC and East 1st Street) to accommodate vehicles, on-street parking and active drop-off/pick-up curb space, separated bike lanes, a wide sidewalk with trees and upgraded bus stops.
- **Traffic / Ped / Bike Improvement –** Re-construction of East 1st Street along property boundary (between Summer Street and City Point western driveway) to accommodate vehicles, on-street parking and bike lanes, where possible. In addition, the reconstruction will include widening of the southern (non-Project side) sidewalk from Summer Street/L Street to Acadia Street, to improve safety and enhance pedestrian experience for site users and neighbors.
- **Traffic / Ped / Bike Improvement –** Upgrade of traffic signal equipment at the intersection of Summer Street and East 1st Street to accommodate adaptive signalization, connectivity, transit priority and more efficient pedestrian walk time distribution.
- **Neighborhood Traffic Improvement –** Re-Striping of East Broadway (between L Street and M Street) to add an additional travel lane in the westbound direction, while preserving on-street parking on both sides.
- **Neighborhood Traffic Improvement –** Upgrade of traffic signal equipment at the intersection of L Street and East Broadway to accommodate adaptive signalization, connectivity, transit priority and more efficient pedestrian walk time distribution.
- **Traffic Signal Connectivity (Vehicle and Transit Improvement) –** Enable adaptive signals capabilities, including transit signal priority and signal connectivity, to allow traffic signals to communicate with each other and/or communicate with the City of Boston Traffic Management Center, as required through the City's Smart Utilities Policy. Connectivity to be enabled along the Summer Street/L Street corridor between Drydock Avenue and East Broadway.
- **Project Transit Improvement –** Upgrade two bus stops within the Project Site to include shelters, fare vending machines and Mobility/MicroHubs with real-time transportation information screens.
- **Neighborhood Transit / Bus Stop Improvements –** Work with the MBTA to improve bus stops along the L Street/Summer Street corridor, beyond the Project Site, focused on improved frequency and reliability of service, including installation of new AFC 2.0 Fare Vending Machines. These improvements are in addition to the bus stop improvements at the 2 site specific stops.
- **Neighborhood Transit / City Point Improvements –** Work with the MBTA to design and implement improvements to increase the layover and passenger handling capacity of City Point Terminal.
- **Bicycle Facilities –** Installation of three BlueBike stations on-site in highly visible locations such as near bus stops and Mobility/MicroHubs (two proposed on Summer Street and one proposed on East 1st Street near City Point), with an

option to install a fourth BlueBike station, if enough demand, to serve Project site residents, employees, visitors and the wider community. Final station locations will be defined in coordination with City's BlueBike coordinator and will depend on availability of appropriate sun exposure, as stations are solar powered.

- **Neighborhood Safety Improvements –** Work with BTD to further the implementation of Vision Zero programs related to traffic calming and pedestrian safety improvements along the L Street corridor beyond the Project site boundary, from East 1st Street to Day Boulevard, and along East 1st Street.

As the Project has been designed to be completed in phases, the implementation of the mitigation measures described above are proposed to be appropriately phased. The transportation improvements to be implemented in association with each phase are summarized in Table 2-15 below. Please note that public realm improvements and their phasing are described in Chapter 1, *Project Description and Supplemental Information*.

Table 2-15 Phasing of Potential Transportation Mitigation

Proposed Mitigation	Implementation Timeline
M Street Extension with crosswalks and ADA ramps	2020 – 2024
Installation of RRFB enhanced crossing at M Street at East 1st Street	2020 - 2024
Turbine Hall Road Connection	2020 – 2024
DFC Service Road Connection	2020 – 2024
Elkins Street Extension with crosswalks and ADA ramps	2020 – 2024
East 1st Street reconstruction, including bike accommodations	2020 – 2024
East 1st Street south sidewalk widening to Acadia Street	2020 – 2024
BlueBike station installation 1 of 3	2020 – 2024
Work with the MBTA to improve bus stops along the L Street/Summer Street corridor	2020 – 2024
Work with the MBTA to design and implement improvements to City Point Terminal.	2020 – 2024
Work with the BTD to further the implementation of Vision Zero programs related to traffic calming and pedestrian safety improvements along the L Street corridor	2020 – 2024
Signal Timing Changes at Summer Street/L Street at East 1st Street	2020 – 2024
Signal Timing Changes at L Street at East Broadway	2020 – 2024
Re-Striping of East Broadway between L Street and M Street	2020 – 2024
Summer Street reconstruction (separated bike lanes, sidewalks widened, microHubs, bus stop improvements)	2024 – 2030
Communication/connectivity along the Summer Street/L Street corridor between Drydock Avenue and East Broadway	2024 – 2030
Signal installation at Summer Street at Elkins Street Extension	2024 – 2030
Signal equipment upgrade at Summer Street/L Street at East 1st Street	2024 – 2030
Signal equipment upgrade at L Street at East Broadway	2024 – 2030
BlueBike station installation 2 and 3	2024 – 2030
Monitoring	Ongoing with each phase

2.6.2 Transportation Demand Management (TDM)

As was outlined in the DEIR/DPIR, the Project is committed to TDM measures that aim to reduce drive-alone trips, or single occupancy vehicles ("SOVs"), by encouraging employees, residents, and visitors to use alternative modes of transportation. The following general TDM measures apply to all Project Components:

- Provide three BlueBike stations on-site in highly visible locations such as near bus stops and Mobility/MicroHubs (two proposed on Summer Street and one proposed on East 1st Street near City Point), with an option to install a fourth BlueBike station, if enough demand, to serve Project site residents, employees, visitors, and the wider community. Final station locations will be defined in coordination with City's BlueBike coordinator and will depend on availability of appropriate sun exposure, as stations are solar powered.
- Provide consolidated bicycle parking, showers, and repair facilities at key locations on the site.
- Post and make available transit maps, schedules, and other information relevant to commuting options in the office and residential building lobbies.
- Upgrade two bus stops within the Project Site to include shelters, fare vending machines and Mobility/MicroHubs with real-time transportation information screens.
- Provide real-time transportation information in all new lobbies within each Project component using Transit Screen or other similar products including online platforms.
- Provide preferential parking to carpool and vanpool participants.
- Inclusion of designated pick-up/drop-off areas on-site.
- Join Seaport TMA which provides a variety of commuter benefits.
- Designate a Transportation Coordinator to oversee the implementation of the TDM measures. The Transportation Coordinator will act as the contact and liaison for the City, local Transportation Management Association ("TMA"), and tenants/residents of the Project.
- Participate in transportation awareness events including: Car-Free Week, MassCommute Bicycle Challenge, and Lunchtime Walking Series.
- On-site transportation fairs and commuter related events.

2.6.3 Monitoring Program

As outlined in the DEIR/DPIR and continuing despite the reduction and modification of the development program to address concerns, the Proponent is committed to conducting a Transportation Monitoring Program. The intent of the monitoring program is to confirm that the post-development impacts of the Project are

consistent with the forecast estimates and to ensure that the mitigation measures are completed and/or maintained.

The monitoring program is expected to include employee and resident surveys, collection of traffic counts, and parking garage counts and occupancies. The implementation of the proposed mitigation measures, TDM measures, parking accommodations, and on-site amenities will also be verified.

2.7 Transportation Access Plan Agreement (TAPA)

The Proponent will enter into one or more Transportation Access Plan Agreements ("TAPAs") with the Boston Transportation Department for each Project Component which will formalize and document all transportation mitigation and TDM commitments. The TAPAs will assign TDM implementation to the appropriate responsible entity within each of the Project Components be that the building owner, an employer, or tenant.

Mitigation commitments are the result of the detailed transportation analyses and identification of Project impacts, as documented in the above chapter, and specific agreements made between the Proponent and the City of Boston.

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- # Signalized Intersection
- # Unsignalized Intersection

1. Summer Street/Drydock Avenue/Pappas Way
2. Summer Street/Dedicated Freight Corridor
3. Summer Street/Elkins Street/Site Driveway
4. Summer Street/L Street/East 1st Street
5. L Street/East 2nd Street
6. L Street/East 3rd Street
7. L Street/East Broadway
8. East 1st Street/K Street
9. East 1st Street/M Street/Site Driveway
10. East 1st Street/West 1st Street/Pappas Way
11. L Street/East 5th Street
12. L Street/East 8th Street
13. L Street/William J Day Boulevard
14. L Street/Columbia Road

Source: ArcGIS Bing Aerial, MassGIS

Figure 2.1

Study Area Intersections

L Street Station Redevelopment
Boston, Massachusetts

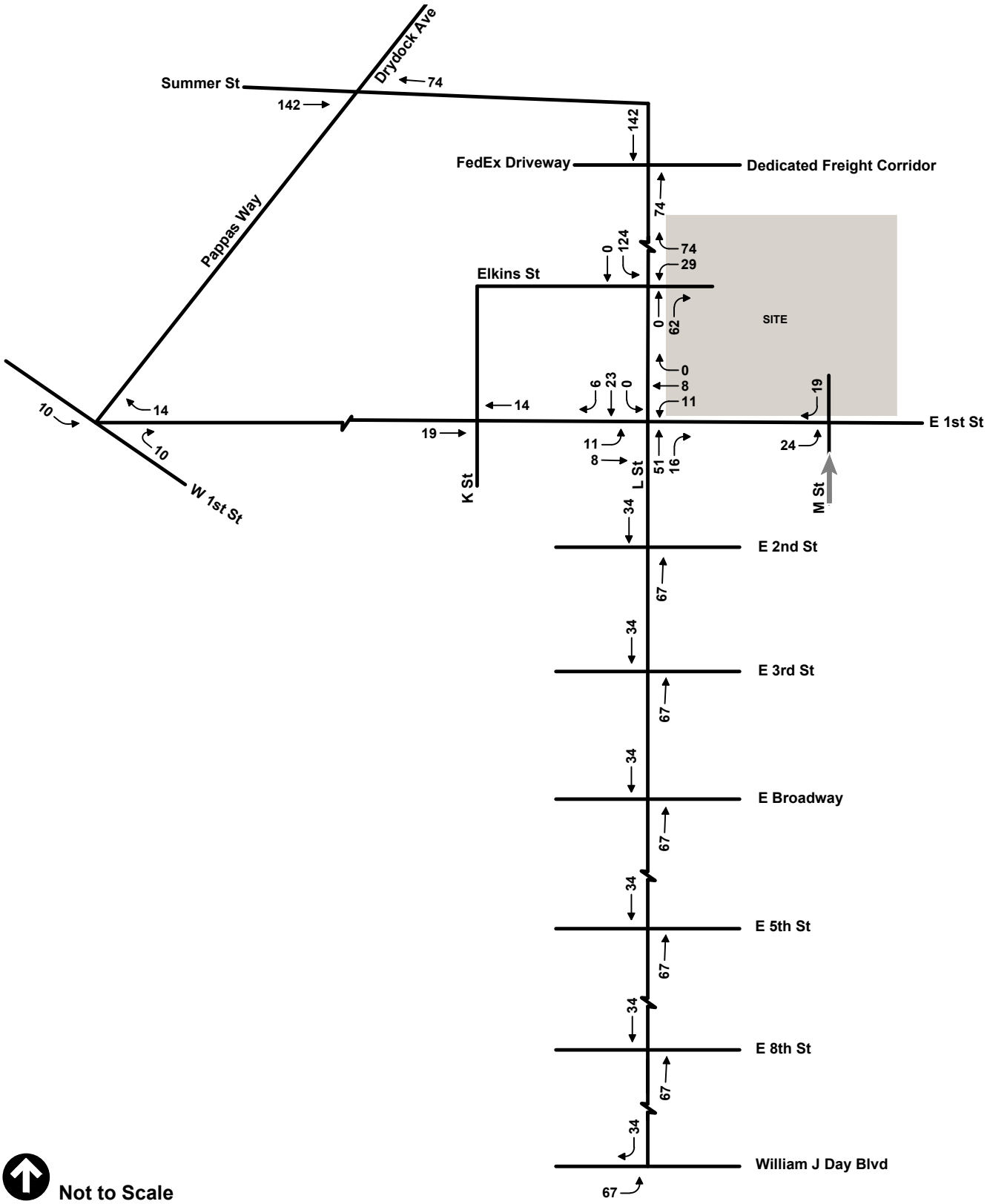


Figure 2.2a

2030 Project-Generated Trips
AM Peak Hour (8:00 AM - 9:00 AM)

L Street Station Redevelopment
South Boston, Massachusetts

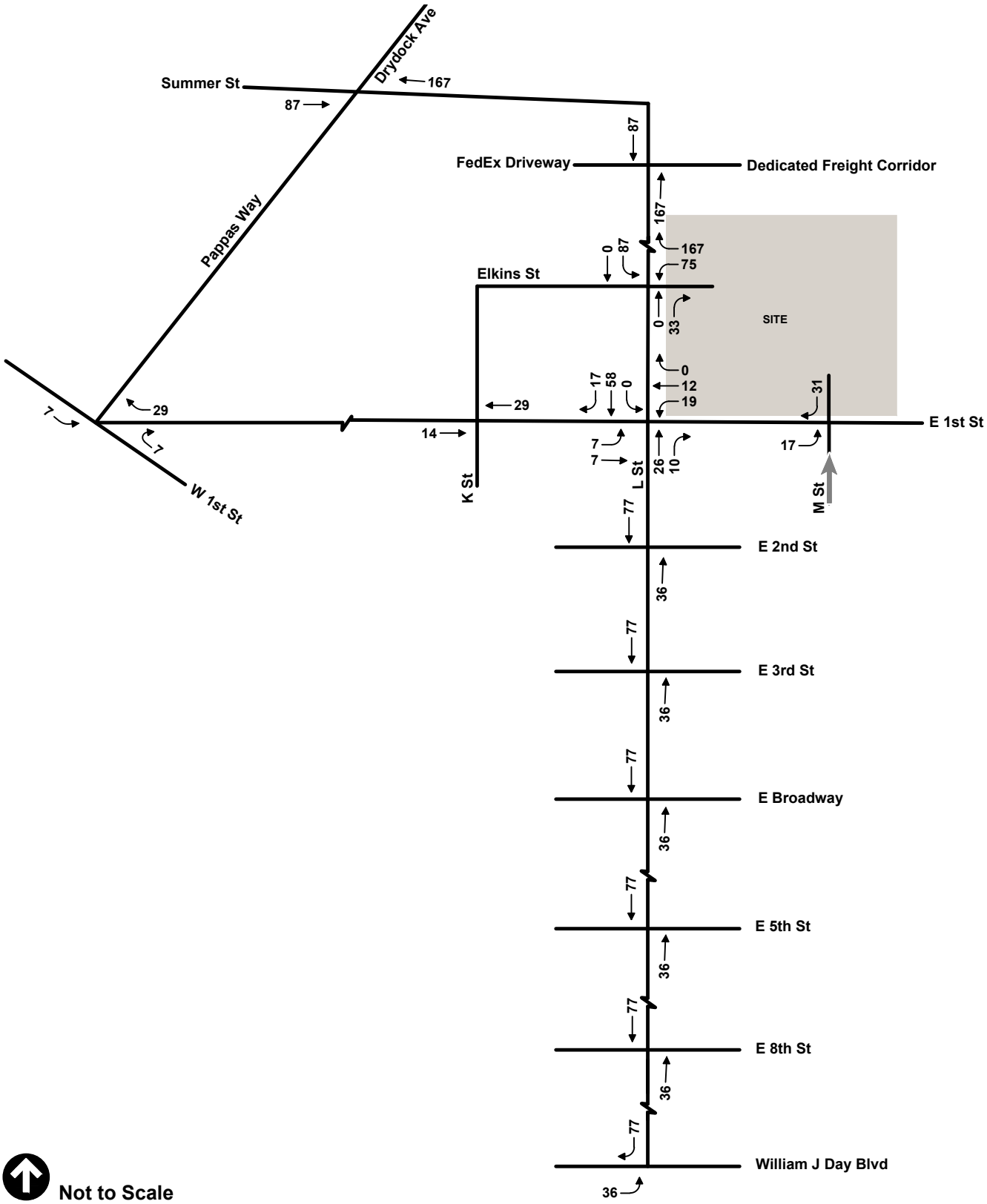


Figure 2.2b

2030 Project-Generated Trips
PM Peak Hour (5:00 PM - 6:00 PM)

L Street Station Redevelopment
South Boston, Massachusetts

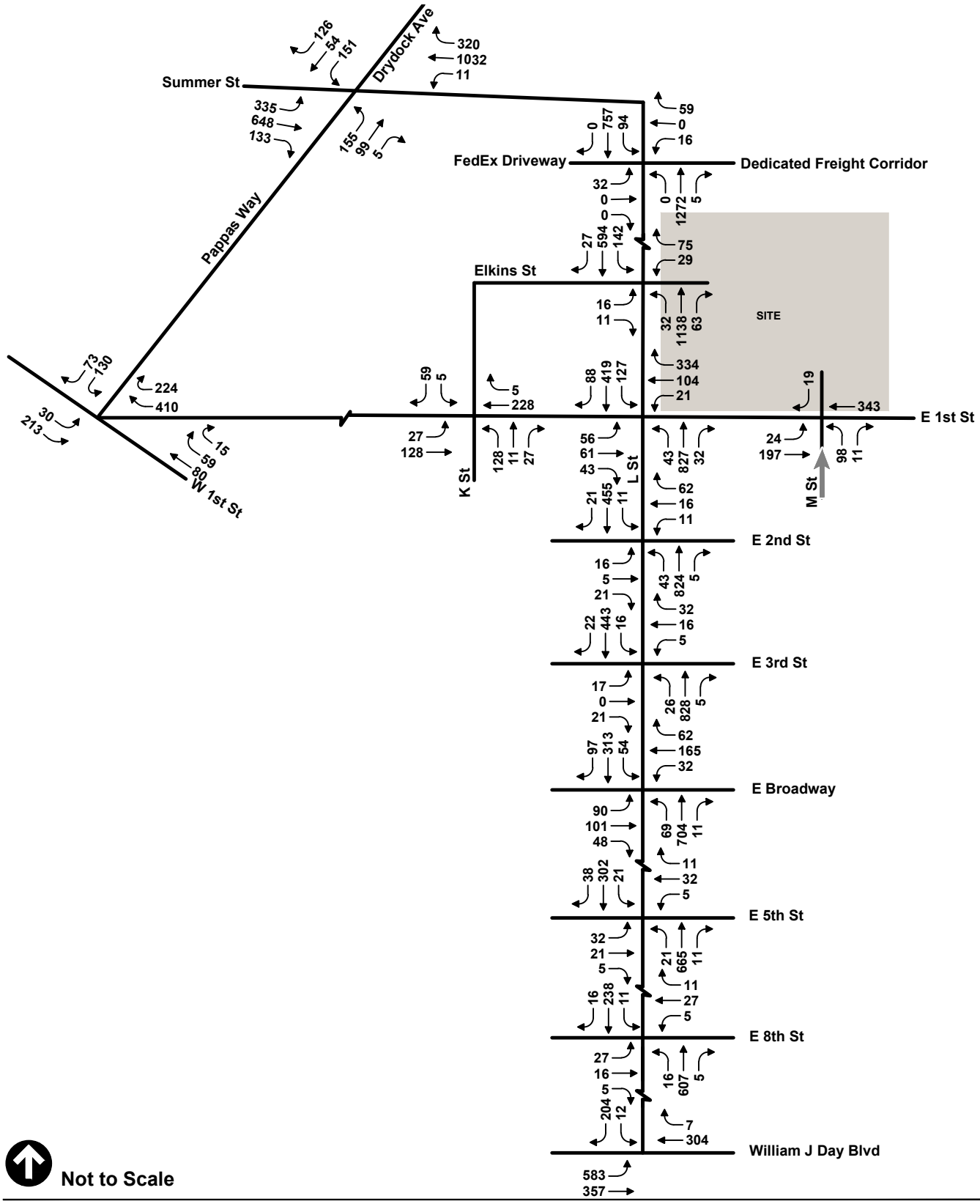


Figure 2.3a

2030 Build Condition Traffic Volumes
AM Peak Hour (8:00 AM - 9:00 AM)

L Street Station Redevelopment
South Boston, Massachusetts

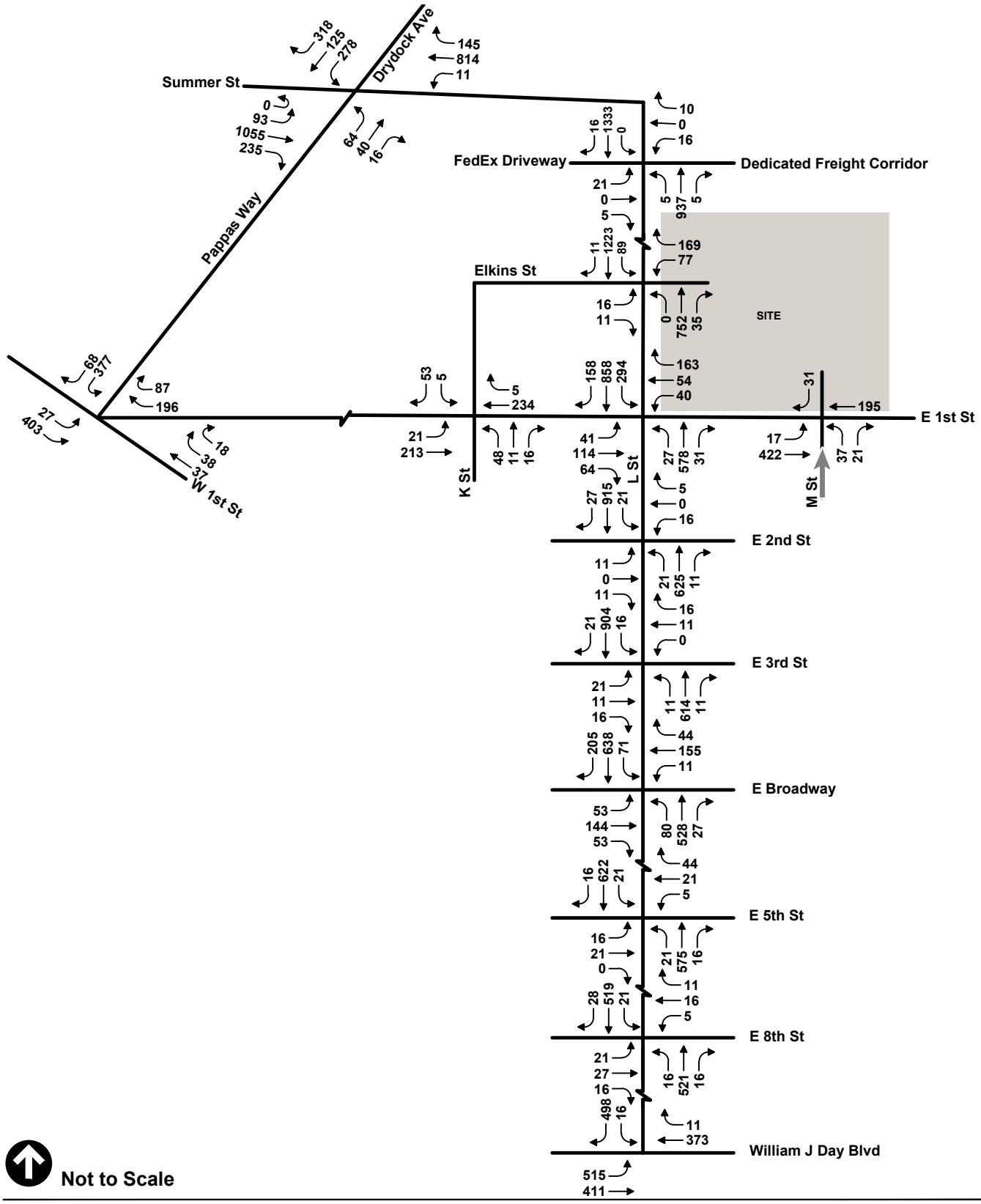


Figure 2.3b

2030 Build Condition Traffic Volumes
PM Peak Hour (5:00 PM - 6:00 PM)

L Street Station Redevelopment
South Boston, Massachusetts

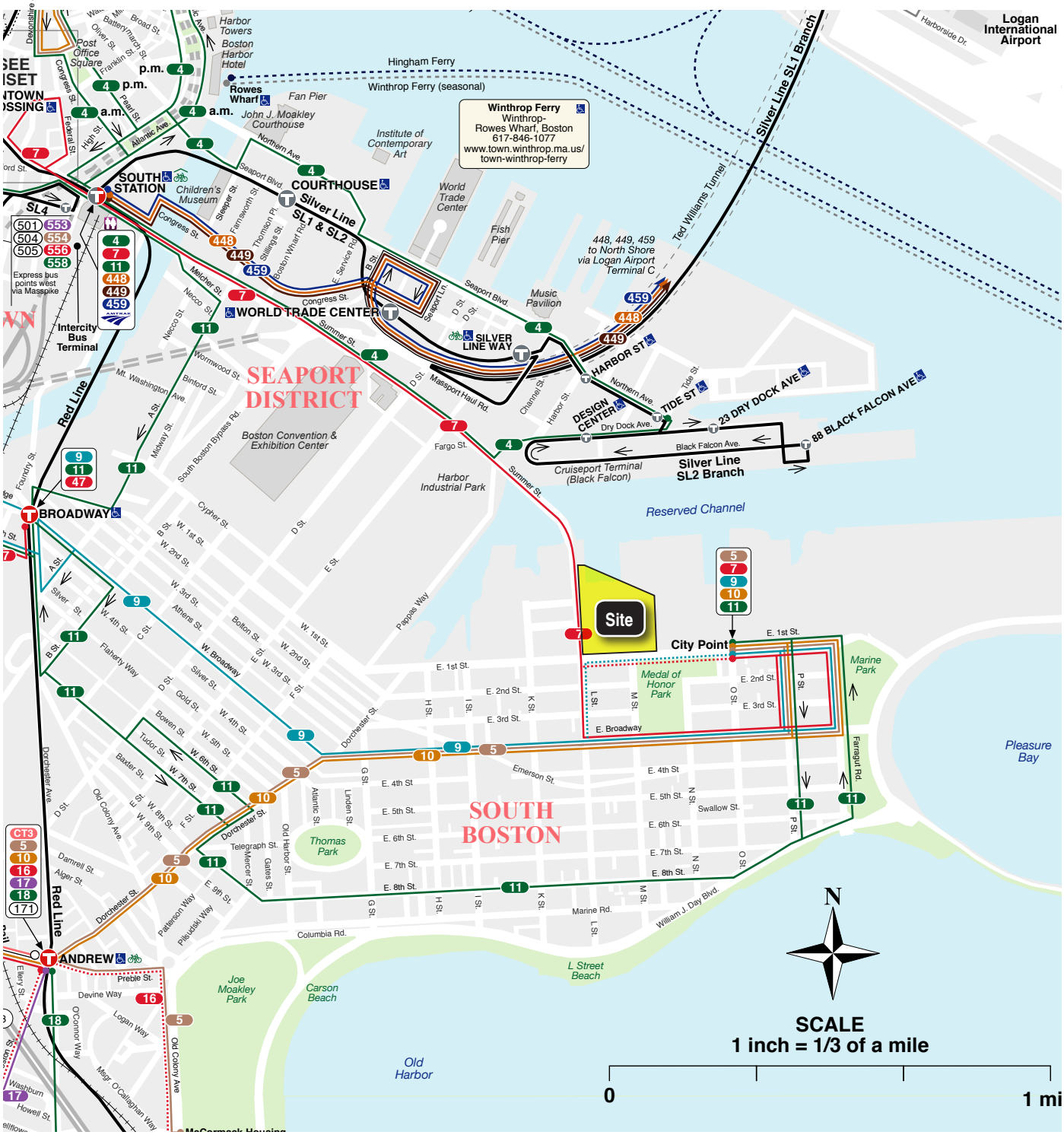
Source: Boston Planning & Development Agency

1. Summer Street/Elkins Street/Site Driveway
2. Summer Street/L Street/East 1st Street
3. L Street/East Broadway
4. East 1st Street/M Street

Figure 2.4

Intersection/Signal improvement Locations

L Street Station Redevelopment
Boston, Massachusetts

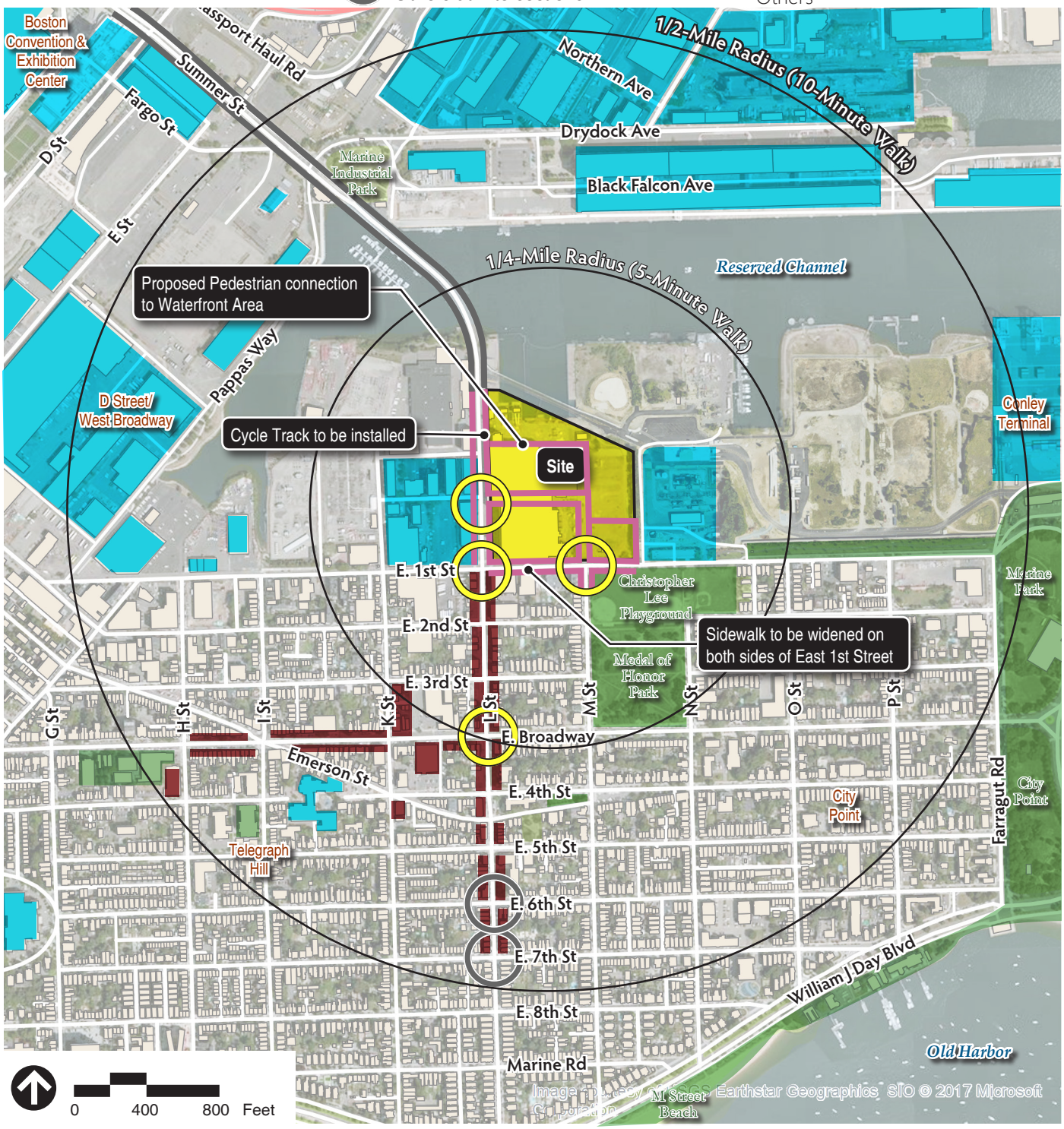


Source: MBTA.com

Figure 2.5

Public Transportation

L Street Station Redevelopment
Boston, Massachusetts



Source: ArcGIS Bing Aerial, MassGIS

Figure 2.6

Bike/Pedestrian Connectivity

L Street Station Redevelopment
Boston, Massachusetts

3

Response to DPIR Comments

This chapter presents direct responses to the BPDA RSI on the DPIR, as well as agency and public comments submitted to the BPDA. Each agency, organization, and IAG letter received during the comment period on the DPIR is assigned a number, as listed in Table 3-1 below, and each individual comment is delineated with a code that corresponds to the response code. Numerous comments were also submitted from members of the public. Responses to these comments are provided by topic in Section 3.6 below, as many of the letters had duplicative comments and/or expressed a similar array of concerns.

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

Table 3-1 List of Comment Letters Received on the DPIR

Letter No.	Commenter	Affiliation/Comment Letter Topic	Date
SD	Boston Planning and Development Agency	Request for Supplemental Information	December 27, 2018
1	Boston Transportation Department and BPDA Transportation Planning Staff	Transportation	December 27, 2018
2	BPDA Planning and Urban Design Staff	Planning/Urban Design/Open Space	December 27, 2018
3	BPDA Environment and Climate Change Planning Staff	Environmental/Climate Change Resiliency/Article 37	December 27, 2018
4	Manuel Esquivel, Senior Infrastructure & Energy Planning Fellow	Smart Utilities	December 27, 2018
5	Carrie Marsh	Boston Parks and Recreation Commission	October 30, 2018
6	Joseph Fleury	Boston Public Works Department	October 30, 2018
7	Stephen F. Lynch	Congressman, 8th District	October 30, 2018
8	Nick Collins, Ed Flynn, Michael Flaherty, David Biele	State Senator, City Councilor, City Councilor, State Representative-Elect	October 29, 2018
9	Jim Coveno	IAG Member	–
10	Anna White	IAG Member	November 7, 2018

Table 3-1 List of Comment Letters Received on the DPIR (Continued)

Letter No.	Commenter	Affiliation/Comment Letter Topic	Date
11	Eileen Smith	IAG Member	October 30, 2018
12	J.F. Bennett	IAG Member	October 30, 2018
13	John P. McGahan	Gavin Foundation	-
14	Dan McCole	South Boston Arts Association	October 30, 2018
15	William J. Mallio	South Boston Open Space and Gate of Heaven Neighborhood Association	October 30, 2018
16	Donna Brown	South Boston Neighborhood Development Corporation	October 30, 2018
17	Gordon B. Coughlin	Power House Company / BSC Group	October 30, 2018
18	Jill Valdes Horwood	Boston Harbor Now	October 30, 2018
–	General Public[1]	Various	Various

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

3.1 BPDA Request for Supplemental Information (RSI)

Comment RSI.1

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

Response

Responses to BDPA staff comments are provided in this section, Section 3.1. The delineated RSI and BPDA staff memos are provided in Appendix A for reference.

Comment RSI.2

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

Response

Refer to Section 3.3 for responses to elected official comments, Section 3.4 for responses to IAG comments, and Section 3.5 for responses to community group comments. The delineated comments are provided in Appendix B for reference.

Section 3.6 provides global responses to public comments, which are related to the following themes or topics:

1. Height/Scale/Massing;
2. Transportation (bus service, traffic);
3. Programming;
4. Affordable Housing;
5. Construction Impacts; and
6. Parking.

Comment RSI.3

In addition to full-size scale drawings, 10 copies of a bound booklet and an electronic copy (PDF format) containing all submission materials reduced to size 8-1/2" x 11", except where otherwise specified are required. The electronic copy should also be emailed to Tim Czerwienski at Tim.Czerwienski@Boston.gov. The booklet should be printed on both sides of the page. In addition, an adequate number of copies must be available for community review. A copy of this request for supplemental information should be included in the booklet for reference.

Response

The Proponent will provide the BPDA with 10 bound copies of the SID filing as well as an electronic copy. Additional copies are available for community review by contacting Seth Lattrell, the Project's permitting consultant from VHB, at slattrell@vhb.com or 617-728-7777.

Comment RSI.4

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

Response

Refer to the updated permits and approvals list in Table 1-2 in Section 1.4 of Chapter 1, *Project Overview and Supplemental Information*.

Comment RSI.5

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

Response

Given the size of the site and need for a Chapter 91 license, the Project is subject to MEPA review by state agencies and the public. The environmental/development impact review documentation submitted to date has been provided as joint filings to satisfy both the MEPA regulations and Article 80B of the Code (the Environmental Notification Form/Expanded Project Notification Form, or "ENF/EPNF", in May 2017 and the DEIR/DPIR in August 2018).

Comment RSI.6

The Proponent will be responsible for preparing and publishing in one or more newspapers of general circulation in the City of Boston a Public Notice of the submission of the filing of supplemental information to the BPDA. Following publication of the Public Notice, the Proponent shall submit to the BPDA a copy of the published Public Notice together with the date of publication.

Response

Public notice will be prepared and published concurrent with this filing. A copy of the public notice will be provided to the BPDA for their records.

3.2 Responses to City Agency Comments

Letter 1: Boston Transportation Department and BPDA Transportation Planning Staff

Comment 1.1

Transportation: *Key transportation elements that should be responded to include: Number and location/siting of Bluebike stations that are consistent with BTD guidelines for bikeshare accommodations, condition of East First Street that provides better accommodations for cyclists, better connect Butler Park to Summer Street with dedicated bike accommodations.*

Response:

The City of Boston's Off Street Bicycle Parking Guidelines call for bike share stations to be provided for any building with over 100 residential units and/or over 100 employees. The Proponent will install three BlueBike stations on-site in highly visible locations such as near bus stops and Mobility/MicroHubs (two proposed on Summer Street and one proposed on East 1st Street near City Point), with an option to install a fourth BlueBike station, if enough demand, to serve Project site residents, employees, visitors and the neighborhood at large. Final station locations will be defined in coordination with City's BlueBike coordinator and will depend on availability of appropriate sun exposure, as stations are solar powered.

The design of East 1st Street has been revised to provide better accommodations for cyclists. Bike lanes have been provided in both directions where feasible. Because the face of the historic building limits roadway width between Summer Street and M Street, sharrows have been used at this narrow point and widening to provide a bicycle lane once past the pinch point. To provide a cyclist connection from East 1st to Summer Street northbound, bicycle lanes have been provided on both sides along M Street and Elkins Street interior to the site. Please see Figures 1.11a-i for updated roadway sections.

Bicycle connections have been improved between Butler Park and Summer Street by improving provisions on East 1st Street as well as through the site to access Summer Street to the north. At each intersection, improvements have been developed so that cyclists can maneuver safely to make the connections. Figure 2.6 provides information on bicycle connections as well as likely destinations.

Comment 1.2

Transportation: *Improve garage and loading access: Elkins Street has the appearance of a loading/parking service road. A better design that minimizes this impact to the public realm is possible. Coordinate with the MBTA about using City Point Terminal access road to provide loading for Block A and connect this service road to the service road between blocks F and H.*

Response:

The garage and loading access have been modified from the previous configuration presented in the DEIR/DPIR. The Proponent will continue to coordinate with the City, MBTA and Massport regarding access for loading behind Blocks A, F and H. More detailed information regarding loading will be determined as each building is developed.

Comment 1.3

Transportation: *Improve the transit analysis, update transit mitigation, and work with the City on shuttle concepts.*

Response:

The transit analysis has been updated according to requests made by the City and the MBTA and is presented in Section 2.4 of Chapter 2, *Transportation.* A mitigation plan is being developed in coordination with City and State agencies and includes infrastructure improvements at traffic signals to prioritize transit and improve travel times and improve bus stops.

Comment 1.4

TDM Management: *The City welcomes the inclusion of a Mobility microHUB at the Elkins/Summer Street intersection. Mobility microHUBs, a recommendation of Go Boston 2030, should be included in additional locations on the site. This will facilitate efficient use and distribution.*

Response:

Additional locations for Mobility microHubs have been researched. Based on the locations of MBTA bus stops and likely locations for shared bicycle stations, three microHubs are currently being proposed. Two microHubs are proposed in conjunction with MBTA bus stops along the site frontage on Summer Street and one on East 1st Street in close proximity to the City Point MBTA station (or at the station if so desired by the MBTA). The Proponent will continue to work with City staff to determine final locations as individual buildings advance through the PDA Development Review Process.

Comment 1.5

TDM Management: *The City welcomes the inclusion of designated pick-up/drop-off areas on the project site. As the Proponent continues to refine site design and transportation analysis, the Proponent should work with City staff to help determine the final locations and sizes of these zones.*

Response:

Anticipated pick up/drop off areas have been identified, however, the Proponent will continue to work with City staff to determine final locations as individual buildings advance through the PDA Development Review Process.

Comment 1.6

TDM Management: *The Proponent should include consolidated bike parking, showers, and repair facilities at key locations on the site.*

Response:

On site, secure, covered bicycle parking, changing rooms and shower facilities will be provided at numbers required by City of Boston Off-Street Bicycle Parking Guidelines. The manner of accommodation for bike parking and shower/changing facilities will be determined during the Development Review process for each phase of construction. Bicycle parking, changing rooms and shower facilities have been calculated per City of Boston Off-Street Parking Guidelines. The findings are indicated in Section 2.5.3 of Chapter 2, *Transportation*.

Comment 1.7

TDM Management: *Given the multi-phase nature of this project site, the Proponent should monitor parking demand at each phase of the project and commit to evaluate and refine parking levels with BTD and BPDA before execution of each project phase. This will ensure supply accurately reflects demand and city goals.*

Response:

Parking supply calculations have been revised based on revisions to the building program and are provided in Section 2.3 of Chapter 2, *Transportation*. Parking demand will be monitored at each phase of the Project and will be evaluated to adjust parking supply for future phases and continue to encourage alternate modes of travel.

Comment 1.8

Site Access and Internal Circulation: *Efficient site access and internal circulation are vital to the success of the proposed project. Key project considerations should include: Continued acknowledgement and discussion of how Vision Zero principles*

incorporating into this site plan and are the paramount concern at this location. The Proponent should continue to work with the City on the design for Summer Street and East First Street.

Response:

Consistent with Vision Zero Boston, the plans for roadways on the site and plans for improvements on adjacent streets take a people-first approach to transportation. The needs of pedestrians and bicyclists, the more vulnerable road users, have been taken into account through wider sidewalks and the provision of bicycle lanes wherever possible. The roadways internal to the site are being designed targeting a low speed limit. The roadway sections are illustrated on Figures 1.11a-i.

Comment 1.9

Site Access and Internal Circulation: *The City welcomes the inclusion of a northbound cycle track on Summer Street as included in the 776 Summer Street filing; this key bike corridor will help meet goals outlined in Go Boston 2030 and aid overall neighborhood safety and mobility. As also noted in the filing, the Proponent should continue to work with City staff on further refinement of the Summer Street design. Improvements to the Summer Street corridor should be consistent with the findings of the Seaport Transit Strategic Plan, anticipated to be released in late 2019.*

Response:

The Proponent will continue to work with City staff on the design of Summer Street and has incorporated any feedback received to date. As the Seaport Transit Strategic Plan becomes available, the Project will work to incorporate recommendations into the site where practicable.

Comment 1.10

Site Access and Internal Circulation: *The Proponent should work with City staff to refine designs for East First Street. This includes recommendations for East First Street cross sections and layout proposed by City staff that would enhance bike and pedestrian accommodations. The following four diagrams (see Appendix C for full comment) from BPDA and BTD staff illustrate layouts for East First Street that provide accommodations for bikes, travel lanes, and parking along with generous sidewalk space. This layout significantly enhances safety for cyclists on the street.*

Response:

The Project has incorporated the proposed cross sections along East 1st Street and worked to ensure that the connections between East 1st Street and M Street and East 1st Street and Summer Street accommodate all users. Furthermore, the Proponent is committed to widening the southern (non-Project side) sidewalk from Summer Street/L Street to Acadia Street, to improve safety and enhance pedestrian experience for site users and neighbors.

Comment 1.11

Site Access and Internal Circulation: *The Proponent should further explore access to and use of the Butler Dedicated Freight Corridor. This should include improved access for MBTA vehicles. Allowing MBTA vehicles to use this corridor, particularly for non-revenue moves, will enable vehicles to bypass the Summer Street/East First Street intersection and more efficiently provide peak period service (Scoping Determination, 17).*

Response:

The Proponent has explored the feasibility of a connection for MBTA vehicles to the DFC and will work with Massport, the MBTA, and the City to determine if the use of the DFC is beneficial for all parties involved. It is important to the Proponent that Massport operations are not impacted by any aspects of the Project.

Comment 1.12

Site Access and Internal Circulation: *The Proponent should work with the MBTA to better utilize the corridor between the MBTA City Point Bus Yard and the 776 Summer Street project site: Provide loading access to the proposed shared corridor to enable loading access to be moved off of M Street Extension; Bicycle accommodations to enable better connections from the East First Street Corridor to Summer Street; and access for MBTA buses to the Butler Freight Corridor.*

Response:

With the proposed Project change, the number of loadings docks on M Street Extension has been reduced, and a service road/alley is now proposed to run behind buildings F and H, and in between buildings A and F. The team will continue to accommodate Loading and Servicing in a way that minimizes impacts to site users, including drivers, pedestrian and bicyclists. As individual buildings are developed, the Proponent will continue to coordinate with City staff on design details.

The Project Site provides better bicycle connections via bike lanes and intersection improvements to enable bicyclists to travel between Summer Street and East 1st Street without passing through the signalized intersection at Summer Street and East 1st Street.

The Proponent has explored the feasibility of a connection for MBTA vehicles to the DFC and will work with Massport, the MBTA, and the City to determine if the use of the DFC is beneficial for all parties involved. It is important to the Proponent that Massport operations are not impacted by any aspects of the Project.

Comment 1.13

Site Access and Internal Circulation: *The proposed internal street grid remains a concern of City planning, transportation, and urban design staff: The Elkins Street "shared street" approach should be further refined given the primary function of Elkins Street as a main backbone to the project site with relatively high volumes of traffic and loading. A mix of traditional street design with raised areas and plaza demarcations will help reinforce the site design and ensure all users of Elkins and M Streets are safe and comfortable within the larger neighborhood street grid.*

Response:

The design of Elkins Street has been updated to incorporate aspects of a more traditional street rather than a "shared street" approach. Although the site intends on having reduced speeds to safely accommodate all roadway users, the Proponent recognizes that a separation of vehicles and pedestrians through the use of traditional roadway components, such as curb and bollards may be needed.

Comment 1.14

Site Access and Internal Circulation: *Loading activity should not occur on the Elkins Street "shared street." Relocating Elkins Street loading away from this important street in the proposed site will free up large swaths of the public realm currently proposed to be occupied by loading docks and zones (Scoping Determination 19). In general, the Proponent should strive to make loading zones and docks as narrow as possible to avoid the impact to the public realm. Further, parking entrances should be limited to 20' wide (zoning minimum) unless justification can be provided by project Proponent.*

Response:

Truck loading is proposed to take place at various locations internal to the Project Site. All loading is expected to take place within designated docks and areas to minimize truck idling on the internal roadways. Residential move-in and move-out will be scheduled to create an organized flow of residents and moving trucks to and from the Project Site. Truck loading is not proposed to occur anywhere on East 1st Street or Summer Street. With the proposed project change, the number of loadings docks on M Street Extension has been reduced, and a service road/alley is now proposed to run behind buildings F and H, and in between buildings A and F.

The team will continue to accommodate Loading and Servicing in a way that minimized impacts to site users, including drivers, pedestrian and bicyclists. As individual buildings get rolled out, the Proponent will continue to coordinate with City staff on design details.

Comment 1.15

Site Access and Internal Circulation: *Consider additional treatments for the Elkins Street/ Summer Street and M Street/E 1st Street intersections to better accommodate bikes and pedestrians.*

Response:

At the intersection of Summer Street at Elkins Street, two stage bike boxes will be provided to facilitate the movement between the streets. At the intersection of Summer Street at East 1st Street, striping and two stage bike boxes will ensure passage for cyclists through the intersection.

As part of the DEIR/DPIR, it was determined that a traffic signal would be warranted at the intersection of Summer Street at Elkins Street. In response to comments from the City of Boston, a Signal Warrant Analysis was also conducted for the intersection of East 1st Street at M Street and found that a full traffic signal is not warranted for this location. However, the intersection can be enhanced with a Rectangular Rapid Flashing Beacon ("RRFB") to alert drivers to slow down and enhance and improve safety at the crosswalks for pedestrians and bicyclists.

Comment 1.16

Site Access and Internal Circulation: *In general, the City supports alignment between Elkins Street and Elkins Street extension to create a regular intersection; and further, a signal warrant analysis for the East First Street/M Street intersection should be conducted. Given traffic volumes, connectivity to the neighborhood, and anticipated pedestrian and bike crossings, it is likely a signal here is necessary.*

Response:

A Signal Warrant Analysis was conducted for the intersection of East 1st Street at M Street and found that a full traffic signal is not warranted for this location. However, the intersection can be enhanced with a Rectangular Rapid Flashing Beacon (RRFB) to alert drivers to slow down and enhance and improve safety at the crosswalks for pedestrians and bicyclists.

Comment 1.17

Site Access and Internal Circulation: *The Proponent should articulate if new streets on the site are proposed to be public, private, or some combination, and explain the reasoning for this decision.*

Response:

The public or private ownership of the streets within the Site, and the rights and obligations of the Proponent therein, remain the subject of continuing review by the City of Boston.

Comment 1.18

Site Access and Internal Circulation: *Bike accommodations through the site should be provided on dedicated cycle tracks or bike lanes (Scoping Determination 21).*

Response:

The design of Elkins Street extension and parts of M Street extension through the site have been revised to include bike lanes on both sides of the street.

Comment 1.19

Site Access and Internal Circulation: *A bike connection to Butler Park should be explored, as outlined in past City comments: Inclusion of grade separated cycle track accommodations through the site either on Elkins/M Street or through the Harbor Park; and improved intersections for bikes - specifically M Street/East First Street and Summer/Elkins.*

Response:

The accommodation of bicyclists through the site have been improved by provision of bike lanes on Elkins Street extension and parts of M Street extension. As indicated in the included exhibits and illustrations, the proposed new East 1st Street layout and cross sections have been coordinated with the BPDA to allow the widening of the sidewalks on the south side of the street as well as the desired vehicular travel lanes and bike lanes.

Comment 1.20

Transit Network and Accommodations: *The Proponent provides an extensive transit analysis and proposes a service-based mitigation package. The City proposes further refinement of this analysis and mitigation concept.*

Response:

The transit analysis has been updated as shown in Section 2.4 of Chapter 2, *Transportation*.

Comment 1.21

Transit Network and Accommodations: *To mitigate the identified service gaps and shortfalls in the City Point neighborhood's MBTA bus service, the Proponent has prioritized the development, funding, and operation of an "innovative" supplemental public bus service. This supplemental service would be designed to address current capacity and operational gaps and shortfalls in established MBTA service in South Boston. In the context of the Better Bus Project, this supplemental bus service is proposed as an opportunity to pilot routing options in assisting the MBTA in ongoing service planning. The Proponent reports entering into preliminary discussions with the*

MBTA regarding this supplemental service and its potential routing. This bus/shuttle service, however, should be further explored and further refined. Furthermore, the Proponent should perform sufficient analysis regarding key features of the future bus service operations.

Response:

The Project has worked with the MBTA and City of Boston to determine the appropriate priorities for project analysis and mitigation. Transportation mitigation is summarized in Section 2.7 of Chapter 2, *Transportation*.

Comment 1.22

Transit Network and Accommodations: *Given MassDOT's and the MBTA's Service Delivery Policy, adopted in January of 2017, the v/c ratio metric used in the submitted transit analysis is not the correct one. Following MassDOT's lead, the project team should provide a fuller picture of transit needs and capacity in the neighborhood given the most current and up-to-date transit analysis methodology.*

Response:

The transit analysis has been revised to reflect the most current methodology from the MBTA and can be found in Section 2.4 of Chapter 2, *Transportation*.

Comment 1.23

Transit Network and Accommodations: *Go Boston 2030, Boston's Citywide long-term mobility action plan from 2017, sets aspirational commuting modeshare goals for the City. By 2030, the target is a one-third increase in the percent of Bostonians who commute by public transportation. The Go Boston 2030 report gives the South Boston public transportation modeshare as 36.9%. Therefore, the aspirational value for this neighborhood is 49%. Given the long-term nature of the proposed project, all public transit analysis should be performed assuming the aspirational modeshare of 49% public transit usage instead of approximately 44%, the modeshare currently planned for (given in Table 5-20 of the DPIR). Thorough consideration should be given regarding 1) how the proposed project can further the City's goals of reaching this target for site users and the surrounding neighborhoods, and 2) how the proposed project can mitigate impacts on, support, and enhance existing service based on the aspirational modeshare value.*

Response:

The transit analysis has been revised to reflect the aspirational transit mode share of 49 percent, per GoBoston2030, and is presented in Section 2.4 of Chapter 2, *Transportation*.

Comment 1.24

Transit Network and Accommodations: *The Draft EIR/PIR notes that existing transit conditions in South Boston are anecdotally worse than what the ridership data might suggest. Bus bunching, delays, overcrowding, and missed runs all contribute to a transit system which does not currently meet the needs of South Boston residents. Further quantified analysis into existing transit issues not captured in provided ridership data, beyond anecdotal and informal field observations, should be completed.*

Response:

The transit analysis has been revised to reflect the most current methodology from the MBTA and can be found in Section 2.4 of Chapter 2, *Transportation*. The analysis includes passenger comfort metrics.

Comment 1.25

Transit Network and Accommodations: *It appears that the Proponent analyzed bus ridership based on the load factor at the bus stop nearest the project site. Doing so does not capture the anticipated route-wide impacts of the proposed project on the public transit system in the neighborhood as a whole. Additional consideration for the downstream users affected by increasingly full buses requires using the "Maximum load" ridership value for a bus run, rather than the load at the stop nearest the project site.*

Response:

The transit analysis has been revised to reflect the most current methodology from the MBTA and can be found in Section 2.4 of Chapter 2, *Transportation*. The new method for estimating the impact of the Project on bus crowding conditions accounts for the peak passenger load point of the bus route between the Project Site and the rapid transit station connection. (This is the method required by MassDOT OPMI and the MBTA.)

Comment 1.26

Transit Network and Accommodations: *Tables 1 and 2 (see Appendix C for full comment) show the sum of maximum loads of 19 Inbound Route #7 buses during one morning hour and 11 Outbound Route #7 buses during one evening hour. While the Proponent has selected intuitive hours as "peak" – buses that pass the project site between 8:00 and 9:00 am and between 5:00 and 6:00 pm – existing ridership data suggest these are not the true peak hours for Route #7 buses. It is imperative that future analyses are more considerate to on-the-ground conditions of service and ridership on these bus routes.*

Response:

The transit analysis has been revised to reflect the most current methodology from the MBTA and can be found in Section 2.4 of Chapter 2, *Transportation*. The new method for estimating the impact of the Project on bus crowding conditions accounts for all of the bus trips during the weekday service span. (This is the method required by MassDOT OPMI and the MBTA.) This method uses the latest MBTA data for its Bus Route Trip Stop Composite Day passenger load profiles, which represent a typical weekday activity of boardings, alightings, and load for each bus route, direction, trip, and stop. Investigation of this data does confirm that the peak-hour of bus passenger loads do not always coincide with the peak-hour of project trip generation.

Comment 1.27

Transit Network and Accommodations: *The proposed project contains a mix of uses whose impacts will not necessarily be fully concentrated during peak times; The evening peak hour v/c on the outbound Route 7 bus in the 2030 Full Build Transit Condition analysis is anticipated to be 1.33, suggesting the severe impacts remain in effect for more than simply the one hour analyzed; It has been conceded that anecdotal and field observations suggest existing transit service does not meet existing transit demand as well as existing data suggest it does, suggesting that, even during off-peak times, there are transit needs that are not captured in existing ridership data that need to be analyzed and addressed; and off-peak operations of several routes, including the #7, are scaled back significantly, suggesting a need to analyze off-peak needs, connectivity, and access for anticipated users, the transit analysis should consider off-peak needs and operations, including the Route #5 bus (which runs only on off-peak hours) and weekend service of all studied routes.*

Response:

Please see response to Comment 1.26. The new method for estimating the impact of the Project on bus crowding conditions accounts for all of the bus trips during the weekday service span.

Weekend service conditions are excluded from the analysis for three reasons: (1) the MBTA's Service Delivery Policy (2017) states "On weekends and some weekday periods, most MBTA services operate with sufficient frequency to provide every passenger with a seat," (2) the MBTA's Passenger Comfort Standard applies to weekday service, and (3) project trip generation is not estimated for weekend activity.

The Route 5 bus service will be discontinued in the Fall 2019, as part of the Better Bus service improvements; thus, it wasn't analyzed for future conditions. Its current passenger crowding measures are presented in Section 2.4 in Chapter 2, *Transportation*, which notes that this route meets the MBTA's Passenger Comfort Metric of the Service Delivery Policy.

Comment 1.28

Physical and Hardscape Transit Improvements: *In order to alleviate existing and future transit issues and needs, the Proponent should provide complete, substantial, and meaningful physical and hardscape improvements that meet City and MBTA goals and standards to improve existing and future bus service; for example, given that MassDOT concluded there needs to be four additional trips as a result of this development, the proponent should identify the infrastructure improvements make those additional trips feasible. A universe of proposed solutions with an expanded scope which includes all bus routes to and from major nearby MBTA Red Line stations should be explored.*

Response:

Refer to response to Comment 1.21.

A transit mitigation plan has been developed in coordination with City and State agencies and includes infrastructure improvements at traffic signals to prioritize transit and result in more reliable travel times, and improvements at bus stops.

Comment 1.29

Physical and Hardscape Transit Improvements: *The proponent should investigate the feasibility of dedicated transit-only lanes in the vicinity of the 776 Summer Street site - this could include downstream sites where enhanced bus infrastructure will provide better service for the entire route. Alternatives, including peak hour parking restrictions, shared lanes, and other innovations may be necessary.*

Response:

Based on a review of the available right of way, dedicated transit-only lanes on Summer Street would not be feasible, without impact to on-street parking and vehicle travel lanes.

Comment 1.30

Physical and Hardscape Transit Improvements: *Additional transit priority infrastructure should be considered along important bus routes feeding the site. This can include, but should not be limited to, level boarding, transit signal priority, visibility improvements, and other physical hardscape improvements to increase traffic and transit flow to and from the proposed site.*

Response:

A transit mitigation plan has been developed in coordination with City and State agencies and includes infrastructure improvements at traffic signals to prioritize transit and result in more reliable travel times, and improvements at bus stops.

Comment 1.31

Physical and Hardscape Transit Improvements: *Improvements to the City Point Bus Terminal should be considered as well, including improvements to the passenger waiting/pick-up/drop-off area with public wifi, heating elements, public art, and real-time arrival/departure information.*

Response:

A transit mitigation plan has been developed in coordination with City and State agencies and includes infrastructure improvements at traffic signals to prioritize transit and result in more reliable travel times, and improvements at bus stops.

The Proponent will continue to work with the MBTA on possible improvements to the City Point Bus Terminal.

Comment 1.32

Physical and Hardscape Transit Improvements: *The proponent should build improvements to Summer Street that are consistent with the City's Seaport Transit Strategic Plan and Summer Street Phase 2 design.*

Response:

The Proponent will continue to work with City staff in regard to the design of Summer Street. As the Seaport Transit Strategic Plan becomes available, the Project will work to incorporate recommendations into the site as possible.

Comment 1.33

Project Transit Mitigation: *This proposed universe of hardscape, physical, and service improvements should include a full analysis of the impact it will have on the transportation network in the neighborhood as a whole. This fully quantified analysis of broader transit improvements should demonstrably, fully, and meaningfully mitigate the impacts of the proposed project on its surrounding neighborhood and the existing and future transportation network.*

Response:

A transit mitigation plan has been developed in coordination with City and State agencies and includes infrastructure improvements at traffic signals to prioritize transit and result in more reliable travel times, and improvements at bus stops.

Comment 1.34

Project Transit Mitigation: *The City appreciates the Proponent's consideration of additional service in the vicinity of the project site. The City will continue to work with the Proponent on service improvements at and around the project site. The Proponent*

should commit to working with the City once the findings of the Seaport Transit Strategic Plan are finalized.

Response:

As the Seaport Transit Strategic Plan becomes available, the Proponent will work to incorporate recommendations where practicable.

Comment 1.35

Bicycle Network and Accommodations: *Safe, comfortable, and connected bike infrastructure for people of all ages and abilities will enable and encourage residents, employees, and visitors to access the site by bicycle. Key elements for consideration should include: A two-way separated bike lane along East 1st Street and through the proposed project site to connect Butler Park to a reconstructed Summer Street. Proposed separated bike lanes should be separated with a raised concrete median, though consideration should be documented for raised cycle accommodations at all locations. Consider locating the separated bike lane through the project site behind Buildings A, F, and H and through the waterfront plaza area.*

Response:

Refer to response to Comment 1.1.

Comment 1.36

Bicycle Network and Accommodations: *Transitions from this separated bike lane to bicycle connections on Summer Street and East 1st Street should be logical, intuitive, and convenient, and should anticipate envisioned bicycle facilities along the project site to not preclude future high-comfort bikeways.*

Response:

The Project has provided logical, intuitive, and convenient connections from the separated bike lane to bicycle connections on Summer Street and East 1st Street. Refer to response to Comment 1.1 for additional details.

Comment 1.37

Bicycle Network and Accommodations: *Bike "sharrows" should be avoided at all costs on the proposed project site as they do not materially advance the safety and comfort of bicyclists.*

Response:

The accommodations of bicyclists through the site have been improved. As indicated in response to Comment 1.1, the cross sections of Elkins Street and M

Street have been revised to include bike lanes on each side and two stage bike boxes at the intersections with East 1st Street and Summer Street.

Comment 1.38

Bicycle Network and Accommodations: *The City appreciates the addition of a Bluebike station at the plaza near Summer Street/Elkins Street. Additional Bluebikes stations should be provided and shown clearly at several locations throughout the project site consistent with BTD guidelines for projects of this size.*

Response:

Refer to response to Comment 1.1. The Proponent will install three BlueBike stations on-site in highly visible locations such as near bus stops and Mobility/MicroHubs (two proposed on Summer Street and one proposed on East 1st Street near City Point), with an option to install a fourth BlueBike station, if enough demand, to serve Project Site residents, employees, visitors and the neighborhood at large. Final station locations will be defined in coordination with City's BlueBike coordinator and will depend on availability of appropriate sun exposure, as stations are solar powered.

Comment 1.39

Bicycle Network and Accommodations: *Further consideration should be provided for showers and repair facilities for bicyclists in at least each office building, as required by Boston's Off-Street Bicycle Parking Guidelines: One shower/changing facility per office building with 100 planned workers or at least 40,000 square feet. One additional shower/changing facility per every 200 planned workers or 80,000 square feet.*

Response:

See response to Comment 1.6. On site, secure, covered bicycle parking, changing rooms and shower facilities will be provided at numbers required by City of Boston Off-Street Bicycle Parking Guidelines. The manner of accommodation for bike parking and shower/changing facilities will be determined during the Development Review process for each phase of construction. Bicycle parking, changing rooms and shower facilities have been calculated per City of Boston Off-Street Parking Guidelines. The findings are indicated in Section 2.5.3 of Chapter 2, *Transportation*.

Comment 1.40

Bicycle Network and Accommodations: *Bike Network Modeling should be further refined and conducted by the Proponent. This should include: Existing Conditions (Adjusted seasonal bike counts, Area Bike Network Inventory, Road Network (Existing & Planned), Bikeshare (Existing & Planned), Size of existing Bikeshare stations and rightsizing for future growth, Bike Comfort Analysis, Bike Connectivity Analysis*

(including: Jobs, Retail, Civic Buildings and Parks), Future Build/No Build Conditions, Future Mitigated Conditions.

Response:

A bicycle level comfort analysis is provided in Section 2.5 of Chapter 2 Transportation.

The Project has provided additional bicycle facilities and logical, intuitive, and convenient connections from the separated bike lane to bicycle connections on Summer Street and East 1st Street. Figure 2.6 illustrates the existing and planned bicycle facilities, connections and destinations.

Comment 1.41

Parking and Loading: *More information should be provided regarding the parking and loading access points, including details on parking garage entrances, loading docks, and all other vehicular access points. Special attention should be paid to the impacts of these locations on the public realm in the internal and external areas of the site. Parking entrances should be limited to two drive isles not wider than 20' (Boston Zoning minimum) unless analysis shows a wider entrance is necessary.*

Response:

See response to Comment 1.14.

Comment 1.42

Parking and Loading: *All parking and loading dock entrances should be consolidated as completely as possible, minimizing the impacts to the proposed project's public realm. Others should be located off Elkins Street and M Street. For example, a consolidated loading scenario for Buildings A, F, and H located to the east of these buildings and off M Street will be encouraged (Scoping Determination 19).*

Response:

See response to Comment 1.14.

Comment 1.43

Parking and Loading: *As noted in the TDM section, the Proponent should commit to evaluate parking demand with each phase of the project to ensure parking supply meets site demand. The Proponent should evaluate designs that enable future repurposing of parking if demand decreases.*

Response:

See response to Comment 1.7.

Letter 2: BPDA Planning and Urban Design

Comment 2.1

Loading and Vehicular Access: As referenced in the Transportation section of this memo, the Proponent should look at strategies to remove/minimize loading on the Elkins Street extension. This is one of only two streets proposed in the plan, and the amount of service located off of Elkins turns it into a service street rather than a lively extension of city street from the surrounding neighborhood grid. Particular attention should be paid to the Eastern half of Elkins where the loading adversely impacts the adjacent Elkins and Turbine plazas. The creation of a more recessed loading area between Building B and Turbine Hall would help limit the impact on Elkins St.

Response:

The Project team has worked to minimize the impacts of the loading and parking garage entrances along Elkins Street by flanking the openings with transparent retail uses on each side as well as by using continuous sidewalk paving materials across the entrances. It is the urban design intention of the Project to prioritize pedestrian movement around all sides of most of the buildings on the site, with priority placed on the pedestrian-only passageway between the Summer Street buildings C & D and the Turbine Halls. Moving the service and access points off the West side of Elkins into the alley would be contrary to the character and intent of keeping a vehicle free zone along the principle pedestrian movement route from East 1st street to the waterfront open space. The design team will continue to work with the BPDA planning and design staff to refine the character of the service and access points in this area to help minimize their visual presence on West Elkins either through recessed entrance doors or architectural devices such as glass paneled doors, etc.

The intent of the plaza open space between Turbine Hall 3 and Building B has been developed as a possible transition zone from the Elkins Street elevation up to the courtyard space behind building B and may no longer be suitable as a possible recessed loading and parking garage entrance. The Project team will minimize the loading and garage entrance impact on East Elkins street by recessing the access points as much as possible in their current locations.

Comment 2.2

Loading and Vehicular Access: A service alley along the Eastern edge of the site would significantly improve the vitality of M Street and improve site circulation overall. While the buildings on the rest of the site struggle to find to appropriate locations for loading, this edge is ideally suited for back of house access. Whether via easement with the MBTA's existing access road or through the creation of a driveway along the projects own property, this is a key opportunity that will have positive implications across the site. An alternative could be to create a single below grade garage linking Buildings A and F, with access off of the service road between Buildings F and H.

Response:

The current design creates a new service drive along the east side of the Project Site within the boundaries of the property that will be used for the service entrances of buildings A, F, and H. The Building A loading and parking entrances have been removed from M Street allowing uninterrupted pedestrian and bicycle flow from East 1st Street to Elkins Street.

Comment 2.3

Public Realm Improvements: The Summer Street edge should be designed to Boston Complete Street standards in coordination with transportation improvements [i.e. street trees within a permeable furnishing zone, 8' clear path of travel, and robust cycle facilities]. This should be highly coordinated with transportation.

Response:

The Summer Street edge has been designed according to the Boston Complete Street standards and has been coordinated with the transportation improvements mentioned above. To allow flexibility and compliance with the ongoing intentions of creating a strong pedestrian realm that also provides safe movement for cyclists and vehicles, the new building footprints have been set back far enough from the property line along Summer Street to allow continued refinement of permeable furnishing zones, cycle zones and pedestrian paths of travel.

Comment 2.4

Public Realm Improvements: Provide cross sections of East 1st Street that coordinate with the plans/cross sections developed as a part of the Butler Street Park buffer, see proposed street layout in the Transportation section of this memo.

Response:

As indicated in the included exhibits and illustrations, the proposed new East 1st Street layout and cross sections have been coordinated with the BPDA proposed street layout above to allow the widening of the sidewalks on the south side of the street as well as the desired vehicular travel lanes and cycle lanes from Summer Street to the Butler Street Park.

Comment 2.5

Public Realm Improvements: Provide a break and ideally pedestrian access between Turbine Hall and Block B to increase porosity along East 1st Street.

Response:

The revised layout creates a new pedestrian connection from East 1st Street into a public courtyard behind Block B and then down into Elkins Street thereby increasing porosity through the site for pedestrian movement and activation.

Comment 2.6

Public Realm Improvements: Improve the pedestrian connection between Blocks A and F to connect to future improvements at the adjacent dog park.

Response:

The Project commits to provide a dog recreation area between Blocks A and F near the residential areas of the Project.

Comment 2.7

Public Realm Improvements: Look at maximizing the amount of green on the site. At a minimum, provide street trees along Elkins and M Street Extensions, and increase greenscape along the waterfront open space and the proposed open space at Block E. In general, hardscape should be reduced significantly. Trees can help to provide a comfortable pedestrian scale for all of the streets and pedestrian connections interior to the site, which may be sorely needed with the heights that are being considered. Additionally, greenspace will help with porosity of the site and abating heat island effect.

Response:

The amount of street trees and green landscape elements has been increased in the current masterplan to soften some of the areas designated for seating and small events. In addition, the courtyard behind Building B has been opened up to pedestrian access from East 1st Street and Elkins Street to increase porosity and flow through the site. The final number and location of street trees will be determined with City input as each phase of the Project advances.

Comment 2.8

Public Realm Improvements: Provide more developed street sections. Explain why dimensions of a traditional street cross section are employed in a curbless street proposal (for example in figure 3.8C). A curbless condition should encourage the creativity and flexibility of a shared street. If a standard street layout is desired then a standard street should be considered/implemented. The current street sections are both wide and lacking a sense of place. They are also employing a great number of

bollards to define who goes where, which is not typically the point of a curbless cross-section. Provide a consistent layout of street trees and opportunities for planting/furnishing zones. Consider a shallow curb to provide functional definition to the street, while creating a channeling edge for stormwater runoff. BPDA Planning and Design Review staff feels strongly that standard street layouts may better serve the project for at least parts of the project. Look at how a standard street section might be blended with raised intersections, for example, to create a transportation network that is attractive and easy for all to understand and use.

Response:

The revised masterplan and street design combines both elements of standard street layouts where requested by the BPDA (Elkins Street) as well as curbless streets with bollards to promote more pedestrian friendly conditions (M Street from Elkins to the waterfront).

Comment 2.9

Public Realm Improvements: Provide sections at the proposed pedestrian shopping area between the turbine Hall and Blocks C and D. What is the dimension of this area? What is the proposed condition on either side? Is it possible to use this for service to the Turbine Hall and Blocks C and D? How does the character/use change when the use in the Turbine Hall Changes? How can this area accommodate trees or large plantings?

Response:

The character and cross-section dimension of the pedestrian passage that runs from East 1st Street to the waterfront changes gradually along its length, getting wider and more active as it approaches the open space. The majority of the passage is activated with ground floor retail uses, starting with smaller shops and businesses on the south, then becoming larger more active spaces including the larger Turbine Hall spaces in Halls 2 & 1 that are intended as publicly accessible market and restaurant uses.

It is the vision of the Project that the grand Turbine Hall spaces become the highlight of the public realm experience as one gets closer to the waterfront, and the walls of the Turbine Hall along the pedestrian passage will be made more transparent and inviting through a number of new entrances and openings throughout their length.

Comment 2.10

Public Realm Improvements: Do street lights have to be atop poles? Look at different opportunities for building mounted or catenary lights to reduce unnecessary elements in the streets and landscape.

Response:

The lighting exterior design guidelines will emphasize unique fixtures that will include building mounted fixtures as well as catenary overhead and artistic lighting to signify pedestrian passages and activity.

Comment 2.11

Buildings & Massing: Building heights, particularly for Buildings A and B, are still significantly taller than the neighboring buildings on the other side of East First Street. The existing fabric runs between 3-4 stories, while Buildings A, B and C are all 7 stories. The extreme narrowness of East First Street, particularly at Turbine Hall, compounds the concern around height on this edge. Provide sections drawn through at least Block A and B and the buildings on the other side of East First Street to show that relationship. Look at stepping back, reducing floor to floor height and other urban design tools to create a comfortable corridor along this block.

Response:

The Project as currently proposed has reduced the height of all buildings fronting East 1st Street by two stories, to a maximum of five stories, so that all the buildings from grade to top of roof structure are lower than the total height of Turbine Hall 3. Refer to Figure 1.10.

Comment 2.12

Buildings & Massing: A reduction in height on Building A would help reduce the scale of this building to the point that flipping the Courtyard from the East First side over to the Building F side would significantly add to the sense of space and reduce the effects of shadows on this important interior open space. A version of an "H" shaped building with a larger courtyard facing Building F but still some recess facing East First would be positive for both sides of the building.

Response:

The building depth and typical floor efficiency requirements do not allow for a workable H-shaped plan. The proposed Project reduced Building A height from seven stories to five stories and this reduction will substantially increase the quality of the street level experience on all sides of the building.

Comment 2.13

Buildings & Massing: Look at combined parking fields as a way to make below grade parking more efficient and to reduce the amount of above grade parking.

Response:

The current design utilizes underground but separate parking structures for most of the buildings. With the revised program that has more commercial, the ability and viability to combine underground parking trays between buildings of different uses, i.e. between Buildings A and F, becomes less likely from a phasing and a financing point of view.

Letter 3: BPDA Environment & Climate Change Planning

Comment 3.1

Permits and Approvals: Please revise Table 1-4 List of Anticipated Project Permits and Approvals to include "Boston Interagency Green Building Committee" and "Article 37 Green Building compliance".

Response:

Refer to the updated permits and approvals list in Table 1-2 in Section 1.4 of Chapter 1, *Project Overview and Supplemental Information*.

Comment 3.2

Green Buildings: *The project team should target LEED Platinum for all buildings with a minimum commitment of at least one LEED Platinum building, no more than one LEED Silver and all remaining buildings LEED Gold OR, as an alternative minimum commitment, LEED Gold for all buildings.*

Please provide a LEED for Neighborhood Development (ND) Sustainability Narrative including a LEED ND Checklist.

Following are specific credits that the project team should give priority to achieving:

- *Optimize Energy Performance–include additional strategies for achieving a 30% or greater reduction in energy use (+5 to 10 points).*
- *Demand Response–include strategies for reducing energy loads in response to utility (+3 points).*
- *Renewable Energy Production–include solar PV (+1 to 3 points).*
- *Regional Priority–the project appears eligible for additional points (+2 to 3 points).*

Response:

The hotel and residential buildings within the development will pursue at least Gold level LEED certifiability, while the commercial office building will achieve at least a Silver level LEED certifiability. The team has identified several points listed in the "Maybe" column on the LEED checklist which can be pursued if Gold or Platinum certifiability is desired. The project team will continue to investigate the potential for achieving a Platinum level certifiability.

Additionally, a preliminary LEED for Neighborhood Development (LEED ND) Checklist has been provided (see Figure 3.2). The team will continue to evaluate the feasibility of LEED ND during the first phase of the design; however, a path towards LEED ND certifiability has been provided.

Comment 3.3

Green Buildings: *In support of Boston's Carbon Neutral 2050 GHG goal, please include the following strategies for reducing GHG emissions:*

- *Prioritize passive strategies such as improved building envelope performance by increasing building envelope air tightness and insulation.*
- *Reduce active building systems and sizes to reflect improved passive performance and ensure systems cost savings are fully captured.*
- *Include solar PV and provide system(s) location, size, and output information along with any related analysis. At minimum the buildings should be solar ready.*
- *Assess the feasibility of CHP and analyze opportunities for on-site battery energy storage systems for reducing peak electrical loads and providing secure energy services for residents.*

Response:

The Project Team will continue to investigate Passive and Active Strategies during the PDA Development Review stage as well as the forthcoming FEIR. The Project team will aim to exceed code-minimum envelope performance values with the use of framed-insulated walls and below code window to wall ratios. The Project team will size active building systems to account for these passive design strategies. The team will continue to investigate solar PV, with the commitment that the buildings are solar ready.

The Project is also involved in the BPDA's Smart Utilities program, which includes a district energy/microgrid study involving analysis of CHP, PV, battery storage, etc. An initial microgrid study was issued in 2018. The team will work with the BPDA to review and assess impacts the new program may have on this study.

Comment 3.4

Carbon Reduction: For the Master Plan/PDA permitting review it might be more reasonable to focus on the three or four primary new building typologies: office, hotel, and residential or mid-rise and high-rise residential buildings. This will allow for more specific consideration of potential GHG reduction strategies and analysis. Building specific analysis can follow.

Response:

The Project team will continue to assess specific GHG reduction strategies for each building as the PDA Development Review for the Project advances. An energy model will be created for each building during the schematic or early design development phase. The energy model will assess LEED compliance, MA Stretch Energy Code compliance, and will be used to further optimize the design through both passive and active energy reduction strategies.

Comment 3.5

Carbon Reduction: The project team should identify additional measures to more significantly reduce GHG emissions with a top priority for passive building strategies that reduce demand and promote occupant comfort and health.

Response:

Additional measures to reduce GHG emissions will be investigated during future PDA Development Review including:

Residential/Hotel Buildings:

- Use of framed-insulated opaque wall with U-values exceeding code
- Reducing overall glass percentage to optimize energy savings with daylight and market-driven requirements
- Optimize glass performance (U-value and SHGC)
- Investigate use of "all electric" heat pump heating instead of gas boiler
- Investigate use of electric or heat pump water heating, where feasible
- Determine a path towards Carbon Neutral

Office/Lab Buildings:

- Use of framed-insulated opaque wall with U-values exceeding code
- Reduce overall glass percentage to optimize energy savings with daylight and market requirements
- Optimize glass performance (U-value and SHGC)
- Analyze feasibility of all-electric HVAC systems such as VRF
- Investigate use of electric or heat pump water heating, where feasible
- Combined Heat and Power systems, where feasible
- Determine a path towards Carbon Neutral

Comment 3.6

Carbon Reduction: GHG emissions analysis should consider both the additional costs for added insulation and air tightness strategies AND the cost savings attributable to reduced system sizing and alternative systems.

Response:

Parametric energy modeling will be completed during Development Review to assess the energy cost savings attributed to added insulation and air tightness. The MEP engineer will run load calculations to determine if added insulation and air tightness could result in a reduced system size. If this is the case, the cost savings from downsized systems will be estimated.

Comment 3.7

Carbon Reduction: Project and building analysis should include potential onsite solar PV and co-gen systems and related GHG reductions.

Response:

The Project is involved in the Smart Utilities program which includes analysis of microgrid systems including CHP and PV. An initial microgrid report was submitted to the BPDA. The initial findings will be re-evaluated based on the latest program as the project moves into the design stage.

At a minimum, building rooftops will be designed to be "solar-ready" with the appropriate structural capacity and electrical infrastructure to support a solar PV installation if deemed feasible at a future date.

Comment 3.8

Climate Resiliency

- *The Climate Resiliency Report included in the DPIR is a WORKING DRAFT. An online version of the CR Checklist should be completed for each of the three or four building types with the resulting PDF submitted with the filing.*
- *The DPIR indicates all building first floor elevations will be at 21.5' (BCB) which is above the BPDA Climate Change Resiliency target elevation for the site. Given the long term sustainability goals of the City and the development, the project team should identify areas where higher ground floor elevations can reasonably be achieved.*

Response:

Given the early nature of design of individual buildings in the Master Plan, the Proponent proposes to complete CR Checklists for individual buildings through Development Review when more detailed design information is available.

The Project proposes to raise the ground floor within the existing Turbine Halls, the surrounding grade and the ground floor elevations of adjacent new buildings approximately five feet above to 21.5' BCB (Boston City Base). Buildings farther up Elkins Street and along M Street will be higher to transition seamlessly into the street and sidewalk elevations of the existing neighborhood along East 1st Street.

Letter 4: BPDA Smart Utilities

Comment 4.1

District Energy Microgrid:

- *The project team is working towards completing the District Energy Feasibility Assessment, which will be followed by the preparation of the District Energy Microgrid Master Plan.*
- *The Feasibility Assessment and Master Plan will define the District Energy Microgrid commitment to be included in the Cooperation Agreement.*

Response:

The Project team will continue to work collaboratively with the BPDA throughout the Development Review process to assess District Energy Feasibility and develop a District Energy Microgrid Master Plan, as applicable.

Comment 4.2

Telecommunications Utilidor:

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

Response:

Refer to Figures 3.3a and b which illustrate the conceptual layout and section of the Telecommunications Utilidor. It is anticipated that manholes will be spaced no more than 300 feet apart with additional access provided at intersections.

The Telecommunications Utilidor is anticipated to be approximately four feet wide by five feet high which will have capacity for approximately 48 to 60 conduits. The length of the Telecommunications Utilidor will be approximately 1,000 linear feet along the M Street and Elkins Street extensions within the Project Site.

Comment 4.3

Green Infrastructure:

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

Response:

Refer to Figure 3.4 which illustrates the locations of proposed Green Infrastructure. The Project plans to provide Stormwater Management Best Management Practices ("BMPs") to control stormwater runoff rates and volumes to BWSC infrastructure and the Reserved Channel in accordance with the MassDEP stormwater guidelines. The Project also plans to adhere to the Green Infrastructure Policy of managing 1.25-inches of runoff over the proposed impervious area on site.

Stormwater Management BMPs include bioretention basins and planters in localized green spaces, subsurface detention and infiltration chambers, tree pits and permeable pavers. The use of green roofs will be studied by the Project team for additional green infrastructure. The implementation of all BMPs is contingent on the soil and groundwater conditions to be studied by the geotechnical engineer.

Comment 4.4

Adaptive Signal Technology:

- Provide a map/diagram highlighting where on the development AST new signals and improvements to signals will be installed
- Provide the following information:
  - Describe how the AST system will benefit/impact the following modes:
    - *Pedestrians*
    - *Bicycles*
    - *Buses and other Public Transportation*
    - *Other Motorized Vehicles*
  - Describe the components of the AST system (system design and components).

Response:

A map highlighting where the traffic signal improvements are anticipated is provided on Figure 2.4.

The Project will enable adaptive signals capabilities, including transit signal priority and signal connectivity, to allow traffic signals to communicate with each other and/or communicate with the City of Boston Traffic Management Center, as required through the City's Smart Utilities Policy. Connectivity to be enabled along the Summer Street/L Street corridor between Drydock Avenue and East Broadway.

> *Adaptive Traffic Signals modify traffic signal cycle lengths and splits based on real time information. The benefit of this technology is that it eliminates lengthy phases with little to no demand and long waits for pedestrians when vehicular demand on a cycle is minimum. The result is a more demand responsive operation where each user (vehicle, cyclist, pedestrian) encounters less delay.*
>
> *Another feature that will be incorporated at the traffic signals is the capability to prioritize transit vehicles. Transit vehicles can be prioritized by extending green times on the phase the transit vehicle is on or truncating red time on other phases. In addition, at the intersection of L Street and Broadway, an additional travel lane will be provided in order to reduce the delay experiences by vehicles at that location.*

Finally, where possible, the traffic signals in the study area will be modified from providing a long pedestrian wait and then an exclusive pedestrian phase and instead move to the City standard of providing a leading pedestrian interval and then concurrent pedestrian phasing. This practice ensures that pedestrians get their fair share of time at the signal and results in lower cycle lengths and delays for all users.

Comment 4.5

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

Response:

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

Comment 4.6

Smart Utility Standards:

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

Response:

Typical sections have been provided as responses to Comments 4.2 and 4.3. These sections are intended to represent standards throughout the Project but are subject to change.

Letter 5: Boston Parks and Recreation Department

Comment 5.1

BPRD respectfully requests that mitigation commensurate to the scale of the development be provided in the form of a contribution to the City's Fund for Parks, to be used for the reconstruction of Christopher Lee Playground. BPRD estimates the improvements to be about $3,600,000 for the creation of clean and safe public open space through the renovation of the playing fields, energy efficient lighting, irrigation, fencing and retaining wall stabilization.

Additionally, BPRD requests consideration of a maintenance endowment and a maintenance agreement to provide ongoing turf management and other services at these public parks.

Response:

The Project will include, as mitigation, the creation, construction and long-term maintenance of public open spaces on-site totaling approximately 5.5 acres that will be accessible to the South Boston neighborhood and to the public generally. See revised diagram (Figure 3.1a and b) illustrating open space types.

Comment 5.2

Further detail is needed to understand the open space proposed in the DEIR/DPIR as the submittal has changed since the ENF/EPNF but only a conceptual plan and narrative is provided. The proponent should clarify how it is counting the acreage and list the type and use.

The public realm of streets, sidewalks, retail plazas and parking areas is distinct from public parks, though it can be complimentary. This type of space should be counted separately.

Response:

Chapter 91: One square foot of open space will be provided for each square foot of new building footprint within Chapter 91 jurisdiction. This open space will include the 2.5-acre publicly accessible waterfront open space. Open space under Chapter 91 includes all accessible at-grade space that is open to the sky.

Public Benefits Determination: Open space is not a public benefits determination requirement, but the Proponent is committed to the creation, construction and long-term maintenance of public open spaces on-site totaling approximately 5.5 acres that will be accessible to the South Boston neighborhood and to the public generally.

Article 80 Planned Development Area: Open space is not a specific requirement under Article 80 provisions respecting Planned Development Areas, but the proponent is committed the creation, construction and long-term maintenance of

public open spaces on-site totaling approximately 5.5 acres that will be accessible to the South Boston neighborhood and to the public generally.

Harbor Walk system: The harborwalk system will be extended through the Project Site. The site is adjacent to Butler Park, which provides connections to the rest of the South Boston Waterfront -Castle Island, Carson Beach, and Moakley Park.

Coastal impacts of climate change: The topography rises quickly from the existing seawall to the current elevation of the site, which means that much of the site is protected from coastal flooding. The design proposal calls for raising the site even higher, to an elevation of +15 NAVD88 (approximately 21.5 BCB). This grade change is achieved through a series of terraces and planting between the existing seawall and the waterfront plaza. Permeable paving will be used to collect stormwater across the site and will be directed toward the waterfront open space, minimizing the impact on the city's stormwater system. Light colored materials and the introduction of shade trees will assist in mitigating the impacts of heat-island effect.

Needs of the users: The proposed design creates a variety of spaces to accommodate everyday use for residents of the community. Smaller plazas with seating and shade trees will create intimate gathering spaces, while the more open waterfront plazas are designed to be able to accommodate a range of uses including markets, exercise classes, seasonal festivals, and terraced seating to enjoy views of the Boston skyline. These larger areas of public programming are situated adjacent to the publicly accessible Turbine Halls.

Imagine Boston 2030: The goals of this Project align closely with those of the Imagine Boston 2030 Plan. The following is a list of stated goals for the Imagine Boston 2030 plan and how this project is contributing to these initiatives:

- Create a new generation of parks along Boston's waterfront
  - This proposal will create a signature Project on Boston's Waterfront by preserving the unique character and history of L Street Station.
- Climate Resiliency
  - Resiliency strategies are a key feature of the open space; the waterfront park is designed to flood and protect the rest of the site from future inundation.
- Improve Access to the Waterfront
  - By extending the city streets to the newly created public park, direct connections are made between the waterfront and the surrounding neighborhood, bicycle paths, and other open spaces.
- Develop family and kid- friendly environments that promote opportunities to play everywhere
  - Family and kid- friendly environments have been incorporated into the design, natural play elements, and water fountains. The waterfront park will be able to host a diverse set of family-oriented programs including seasonal festivals, exercise classes, and public art installations.

Comment 5.3

This project is subject to State and local regulations and requirements for open space including those below. The proponent should detail how the project will meet or mitigate the following:

- Open space required under Chapter 91;
- Open space approved by the EOEEA Secretary as a Public Benefits Determination;
- Open space required by the underlying Article 42A Harborpark District zoning which requires that a project devote at least 50% of the lot area to open space;
- Open space mitigated for the Article 80 Planned Development Area in lieu of zoning;
- Open space for public access required for the City's Harbor Walk system;
- Open space intended to protect the project from coastal impacts of climate change;
- Open space which serves the needs of the users of the development;
- Open space which serves the needs of the neighborhood as identified in the Imagine Boston 2030 and the Open Space and Recreation Plan;
- Mitigation for impacts to existing public open space in the neighborhood.

Response:

Refer to response to Comment 5.2

Comment 5.4

The proponent should explain the proposed phasing of the open space. The Article 80 and MEPA approvals should consider a requirement that the waterfront open space be implemented in the first phase of development. This will ensure that the public benefit to the neighborhood of South Boston is fully realized in the near term and is not subject to ongoing amendment.

Response:

Refer to Chapter 1, Section 1.2.2 for a summary of Project phasing. Interim waterfront improvements are proposed in Phase 1B (2021-2023) while the final buildout of the waterfront open space will be completed in Phase 2 (2024-2030).

Comment 5.5

Open space required under regulation such as zoning or provided as mitigation of a PDA, or required under Chapter 91 or approved as a public benefit by the EOEEA should be permanently protected to ensure that it remains a public benefit in perpetuity. It may be managed privately.

Response:

The PDA and Chapter 91 approvals for the L Street Station redevelopment will require the permanent protection of the designated public open spaces.

Comment 5.6

The DEIR/DPIR does not detail the number of residents, employees, shoppers, or visitors expected to use the site at build out. A needs analysis should be completed based on projected users of open space. This analysis should estimate of the demand for active recreational needs, the ability to accommodate those needs onsite, and/or the reliance on existing public open space.

Response:

The proposed redevelopment of L Street Station will include significant open spaces that are designed to provide a variety of recreational opportunities. As the Project proceeds, the developer will continue to assess the appropriate balance of active and passive recreational opportunities, including neighborhood input.

Comment 5.7

South Boston is currently underserved by public parks, playgrounds and athletic fields suitable for active recreation. Significant new development is putting pressure on existing public open space. This project will add 1.9 million sf of development with 1344 households, and will require new parks to meet the active recreational needs of the population that is created through the PDA. An impact assessment should be conducted to determine impacts to public open space.

Response:

The proposed redevelopment of L Street Station will include significant open spaces that are designed to provide a variety of recreational opportunities. As the Project proceeds, the developer will continue to assess the appropriate balance of active and passive recreational opportunities, including neighborhood input and in consideration of the open space goals set forth in Imagine Boston 2030.

Comment 5.8

The proponent should address how it is meeting the public open space needs outlined in Imagine Boston 2030, which includes the Open Space and Recreation Plan 2015-2021. The proponent should explain how it is helping the neighborhood to achieve the city average of 3.24 acres of active recreational open space per 1000 residents, at a minimum.

Response:

The Proponent is committed to creating a 2.5-acre publicly accessible waterfront open space and 3 acres of other public open spaces throughout the site. The

proposed redevelopment of L Street Station will include significant open spaces that are designed to provide a variety of recreational opportunities. As the Project proceeds, the developer will continue to assess the appropriate balance of active and passive recreational opportunities, including neighborhood input and in consideration of the open space goals set forth in Imagine Boston 2030.

Comment 5.9

The project will be 82 to 210 feet tall and will be approximately 50 feet from Christopher Lee Playground. The proponent should provide detailed shadow studies showing impacts to public open space year round, from dawn until dusk. This information may have been provided already, but was not readily evident in the DEIR/DPIR filing online. Any impacts should be mitigated.

Response:

The new massing indicates lower buildings along East 1st Street. Refer to Figure 1.10 for updated massing diagrams. Detailed shadow studies were provided in Chapter 6 of the DEIR/DPIR. The revised massing does not substantially alter the results of those previous shadow studies.

Comment 5.10

The proponent should summarize and mitigate any potential project impacts (noise, air quality, traffic congestion, etc.) on Christopher Lee Playground/ Medal of Honor Park.

Response:

Detailed analysis of the Project's noise, air quality, and traffic impacts were assessed in the DEIR/DPIR. Impacts were evaluated throughout the Project area including noise receptors located directly on Christopher Lee Playground and Medal of Honor Park, and evaluation of air quality and traffic impacts at certain key intersections in the vicinity of the of those open spaces. Key findings of that analysis are summarized below:

- **Noise:** As described in DEIR/DPIR Section 6.4 of Chapter 6, *Environmental Protection*, noise impacts associated with the loading activities and mechanical equipment are anticipated to be minimal and will adhere to the City of Boston's noise impact criteria.
- **Air Quality**: As described in DEIR/DPIR Section 6.5 of *Environmental Protection*, the Project is not anticipated to have an adverse impact on local air quality and will conform to the National Ambient Air Quality Standards.
- **Traffic Congestion**: As described throughout DEIR/DPIR Chapter 5, *Transportation*, The Project will generate new vehicle trips on area roadways but will offset and mitigate those new trips by implementing a robust program of TDM strategies, local roadway improvements, and is contributing to significant improvements to area transit service.

Comment 5.11

The proponent should detail any potential construction impacts (noise, air quality, traffic impacts, street closures, etc.) on Christopher Lee Playground/ Medal of Honor Park.

Response:

As described in DEIR/DPIR Section 6.6 of Chapter 6, *Environmental Protection*, construction impacts will be temporary in nature and managed to minimize disruption to the surrounding neighborhood. Construction Management Plans ("CMPs") will be prepared for each phase of the Project to address temporary construction-related impacts. A draft CMP was provided with the DEIR/DPIR for review and comment in Appendix G.

Comment 5.12

The project should include a dog recreation space onsite. This project is adjacent to a dog park, but the high density of development would burden one of the few dog parks available in the city. The project should therefore plan to accommodate the needs of its own canine residents onsite.

Response:

The Project commits to provide a dog recreation area between Blocks A and F near the residential areas of the Project.

Letter 6: Boston Public Works Department

Comment 6.1

Developer must provide an engineer's site plan at an appropriate engineering scale that shows curb functionality on both sides of all streets that abut the property.

Response:

The developer will provide the Boston Public Works Department ("PWD") with an engineered site plan at an appropriate scale. All work within the Public ROW will conform with PWD Design Standards, and the Project will seek approval through the PIC process.

Comment 6.2

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

Response:

The developer will provide the PWD with an engineered site plan at an appropriate scale. All work within the Public ROW will conform with PWD Design Standards, and the Project will seek approval through the PIC process.

The Elkins Street and M Street extensions are planned to be designed to Boston Complete Street Guidelines and reviewed and approved through the PIC process.

Comment 6.3

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

The developer should include the sidewalk abutting the Medal of Honor Park/ Christopher Lee Playground in the proposed reconstruction of East 1st Street, to provide an accessible pedestrian path of travel on the south side of East 1st Street.

The developer shall work with the City to explore expanding the redesign of Summer Street/L Street from the current proposed limits (Freight Corridor to East 1st Street) to East Broadway, to provide a cohesive design of the corridor. This design should complement the City's current design efforts in the Seaport.

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

Response:

The Project proposes to reconstruct the public sidewalks abutting the Project Site on Summer and East First Streets. The Proponent is also proposing to reconstruct public sidewalks on the south side of East 1st Street to provide additional width. The reconstructed sidewalks associated with the Project will meet ADA and AAB guidelines.

The Proponent does not plan to extend improvements to any portion of L Street beyond the Summer Street and East First Street intersection.

Comment 6.4

Any proposed driveway curb cuts will need to be reviewed and approved by the PIC.

Response:

Comment noted.

Comment 6.5

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

Response:

Comment noted.

Comment 6.6

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

Response:

Comment noted.

Comment 6.7

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

Response:

Comment noted.

Comment 6.8

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

Response:

Comment noted. The Proponent will coordinate with the PWD Street Lighting Division, as necessary, and incorporate their recommendations into the Project design.

Comment 6.9

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

Response:

Comment noted. A plan will be submitted to the PWD Engineering Division for review and approval of the proposed roadway restoration.

Comment 6.10

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

Response:

Comment noted. Projects will be entered into COBUCS as phases are developed and sequenced.

Comment 6.11

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

Response:

The Project team will evaluate which green infrastructure/stormwater management BMPs are appropriate for the public right-of-way on Elkins Street and M Street extensions. No green infrastructure is proposed in Summer Street or East 1st Street. The Proponent will look to develop an appropriate LM&I Agreement with the PIC for green infrastructure included in the new public roads.

Comment 6.12

All new roadway shall confirm to the Public Works Department's Roadway Design Standards.

Response:
Comment noted.

3.3 Elected Official Comments

Letter 7: Congressman Stephen F. Lynch

Comment 7.1

The proponents have verbally agreed to pay for an independent Licensed Site Professional (LSP) to oversee the cleanup phase of the project on behalf of the local community.

Response:

The Project commits to hiring a Licensed Site Professional ("LSP") to work on behalf of the community to oversee the cleanup phase of the project.

Comment 7.2

In addition, there was some confusion regarding the wide range of estimated vehicle trips that were expected as a result of the project. More accurate data and greater certainty in traffic analysis would be very helpful.

Response:

The number of auto trips generated by the Project is consistent with industry-standard methodology for all development projects. The goal is to project how many trips are expected to be generated by each mode, including auto, transit, biking and walking arriving at and departing from the development.

The primary source for trip generation is the Institute of Transportation Engineers (ITE) Trip Generation manual, which is based on numerous studies for a wide range of land uses. The data are based on locations from across the United States that are predominately auto-dependent, and do not reflect the availability of transit and other non-auto modes available in an urban setting. Because of this, the projected trips reflect numbers that are more like person trips by auto rather than auto trips. The only practical use for these unadjusted numbers is for the thresholds for review required under MEPA.

When adjusted for vehicle occupancy (the average number of people per auto) the projections reflect total person trips by all modes. These person trips include multiple trip purposes during the entire 24-hour day by all available modes. While some commuter trips to work may be auto trips many will be transit, bike or walk trips. People living and working in the development, or nearby, are highly likely to walk to work, and these "internal" trips, which are included in the total daily trips, don't even enter or leave the development. As a result, not all the daily person trips ever end up outside of the development area.

There are also numerous non-commuter trips that do not rely on auto mode. A trip by a resident to a local convenience store, or to walk a dog or go jogging would

account for 2 of the total daily trips (1 inbound and 1 outbound), but would not be an auto trip. Similarly, an employee leaving a building to pick up a sandwich in Turbine Hall at lunch time would also account for 2 of the total daily trips that will not be auto trips.

By way of example, the ITE trip generation rate for a condo is an average of 5.44 daily one-way trips. In practice, if one person in the household goes out jogging and later goes out for a coffee at a local store, 4 of the 5.44 daily trips are already accounted for by non-auto modes.

ENF/PNF Filing – May 2017

The Project filed the ENF/PNF on May 15, 2017. The trip generation numbers for this filing were based on the 9th Edition of the ITE Trip Generation Manual, the most recent publication at the time of the analysis and filing. This yielded a total of 20,370 unadjusted daily trips (10,185 in and 10,185 out). The adjustments made for mode share were based in the BTD Area 13 information collected from the 2000 Census, as an initial estimate of the travel behaviors for people living and working in South Boston, yielding a total of 10,250 daily auto trips (5,125 in and 5,125 out). The BPDA and BTD staff recommended VHB use BTD Area 13 mode share data, as they had not completed an update of the mode shares for the area as part of the then ongoing GoBoston 2030 planning process.

DEIR/DPIR Filing – August 2018

Several changes were made between the ENF/PNF filing and the DEIR/DPIR filing, including a reduction in the Project program from 2.1 million square feet to 1.93 million square feet, along with changes in the mix of uses. At the same time, the new 10th Edition of the ITE Trip Generation Manual was published, providing updated trip rates and more detailed information for evaluating how the location of a project and the availability of alternative travel modes influence mode share. This yielded a revised total of 17,121 unadjusted daily trips compared to the 20,370 in the ENF/PNF.

In addition, the BPDA scoping determination letter on January 12, 2018 included the following direction:

> *"The proponent utilizes BTD mode splits for South Boston (BTD Area 13) for transportation trip generation analysis. This mode share assumption assumes a high vehicular mode split and low transit and walk/bike/other trips… The proponent should further analyze mode splits based on transportation enhancements that are anticipated with the development. This analysis should be prepared in concert with BPDA and BTD staff input. The goal of this analysis is to present realistic mode splits for the 776 Summer Street site."*

In response, the Proponent compiled studies from the surrounding area, census data, and goals stated in the Go Boston 2030 Vision and Action Plan and worked with the BPDA and BTD to determine more realistic mode shares reflecting recent trends and projected trends in reduced auto use.

The revised analysis for the DEIR/DPIR filing reflecting the refinements in realistic mode share characteristics yielded a total of 5,632 daily auto trips (2,816 in and 2,816 out) compared to the 10,250 trips in the ENF/PNF.

For this SID filing, the program has been reduced again which further reduced the project generated vehicles trips to below DEIR/DPIR filing levels.

Comment 7.3

Over the past 15 years significant efforts by City, State and MASSPORT have mitigated environmental hazards and re-engineered neighboring parcels to this site. Significant resources have been dedicated to remove heavy trucks and commercial traffic from East First Street and to transform the area into a pedestrian-friendly street.

Response:

The Proponent commits to a series of traffic and transit improvements targeted at improving the frequency and reliability of MBTA bus service and increasing pedestrian safety within the neighborhood. The traffic, pedestrian, bike and transit improvements are expected to improve mobility in and around the Project Site. The interior roadway structure and building layout has been reprogrammed to ensure that truck traffic and deliveries occur in service alleys or toward the rear of buildings as to alleviate the visual and traffic impacts of service vehicles to the extent practicable.

To promote enhanced pedestrian access and promote a diversity of pedestrian experiences, the Proponent has added a new pedestrian greenway off East 1st Street, creating a third pedestrian entry point to the Site from South.

Comment 7.4

There is a palpable fear that the addition of 1300 apartments, two hotels and 450,000 sf of office and retail space might overwhelm the area and negate all the progress made so far. It is fair to say that scaling back the mass of the project would be helpful. It is reasonable to expect that with 15.2 acres to work with, the proponents can thoughtfully scale back their proposal and yet still have a very successful and profitable result.

Response:

The Project re-balances the mix of uses at the Site, with a focus on commercial uses that are compatible with Conley Terminal and create a variety of job creation opportunities for neighborhood residents. The number of proposed housing units is reduced by almost half (44%) to a maximum of 750 units. The overall scale of the Project is also reduced by 150,000 gross square feet.

The Project massing has been reduced along East First Street to ensure that it will knit into the fabric of the existing neighborhood. The residential buildings along East First Street are reduced in height from seven stories to five. At full build, the restored

Turbine Hall 3 will be the tallest and most prominent building along East 1st Street. In addition to reducing massing along East 1st Street, the Project proposes to widen sidewalks and add street trees on both the north and south side of East 1st Street to improve the pedestrian experience and enhance the Site integration within the existing neighborhood.

Comment 7.5

A severe lack of available parking is the bane of our existence in South Boston. The proponents need to find a way to provide some off-street parking to their neighbors in perpetuity. Discussions with the MBTA and MASSPORT may offer a way to collaborate. Based on the size of this project and current demand, it would require about 120 South Boston Resident-Sticker only parking spots to relieve the current situation for their long-suffering neighbors. A modest fee for such parking could be acceptable.

Response:

The reduction in Project massing has reduced the parking demand at the site. The Project has increased the parking ratio to one space per residential unit. The Project will provide 120 parking spaces to neighborhood residents on nights and weekends at a discounted rate, within the parking garages in the commercial buildings. The Project will also enter into an agreement with the City to waive resident parking stickers for apartment residents on the site.

Letter 8: Senator Nick Collins, Councilor Michael Flaherty and Representative David Biele

Comment 8.1

In light of the size, scope, and complexity of the proposal, we believe an extension is warranted and would allow residents to provide thoughtful comments on the proposal.

Response:

The public comment period for the DPIR ended approximately 75-days after public notice of the DPIR submission. During this comment period the BPDA hosted publicly advertised community meetings regarding the DPIR on September 19, September 26, October 10, and October 24. Additionally, the BPDA hosted IAG meetings which were open to the public on September 26, October 10, and October 24. Since the close of the comment period the Proponent has continued to engage with key stakeholders to understand community concerns and has proposed a variety of project changes to address the key community concerns as outlined in this document.

Comment 8.2

We would also like the proponents to publicly present Alternatives A and B to their primary proposal so that the community can carefully consider all options.

Response:

Since the conclusion of the DPIR public comment period, the Proponent has reviewed alternative development scenarios and modified the development program to address the key community concerns. The Project now reflects a 44 percent reduction in housing units, allowing for a maximum of 750 units (down from 1,344 as previously proposed). The Project now contains 60 percent commercial uses, including the conversion of two buildings near Conley Terminal operations from residential to commercial use. The largest proposed commercial use is now R&D/Lab, a use which has shown to be highly compatible with continued marine industrial use.

Additionally, a more detailed assessment of the Commercial Alternative is provided in Chapter 1, Section 1.5.

3.4 IAG Comments

Letter 9: Jim Coveno

Comment 9.1

I encourage Redgate to increase the quantity of trees.

Response:

The number of street trees and the amount of green landscape elements has been increased in the current masterplan to soften some of the areas designated for seating and small events. In addition, the area behind Building B has been opened to pedestrian access from East 1st Street and Elkins Street and will be designed with green landscape as well.

Comment 9.2

The trip counts can somewhat be mitigated by the creation of an additional access point to the site. Currently there are two public access points and one commercial point. The addition of one more will serve two purposes. First it will disperse the vehicles across a wider area, secondly it will give the access roads an additional stacking lane, thus allowing the area's through traffic to move because it will not be burdened by a potentially excessively long line vehicles trying to gain entry at the singular access point on Summer Street.

Response:

The site access points were developed to minimize disruptions to the vehicular, pedestrian and cyclist flow along Summer Street and East 1st Street and were located to form four-way intersections connecting into the City neighborhood pattern. For the best pedestrian and cyclist experience, minimizing the conflict points (i.e. fewer vehicular entry/exit points) is important. As was outlined in the DEIR/DPIR, there is minimal queuing anticipated on the site access points as currently proposed.

Comment 9.3

Redgate's proposed signal improvements will help but at this time they (Redgate) has not presented enough data to account for the projected increase in terminal truck trips. Redgate should more fully explore this impact and have in place a plan to augment the traffic patterns should the traffic to and from their site become problematic to the terminals operations.

Response:

The Proponent continues to work closely with Massport to understand the terminal truck trips to ensure that the Project does not adversely impact Conley Terminal operations. Discussions with Massport will be ongoing through the FEIR and future development of the site. The updated traffic analysis for the revised redevelopment program, which includes a projection of Massport growth, does not indicate an adverse impact on the DFC. The Proponent has also agreed to continued monitoring of traffic and parking to identify and address unanticipated impacts and issues.

Comment 9.4

The Redgate proposal as is, simply does not address parking to the extent the residents are comfortable with. Every effort must be made to, at a minimum double the current scheduled parking spaces. It is felt by many residents that a partnership with MBTA and Massport might be the solution. 1. To share burden of costs and also minimize the real-estate require to house a parking garage. With this public private partnership all three interested parties would ultimately benefit and the residents of South Boston will get what has been a steady mantra for more than a decade, that being a parking facility in the neighborhood.

Response:

Residential parking on-site is increased to one space per unit. In addition, the Project will provide 120 parking spaces to neighborhood residents on nights and weekends at a discounted rate, within the parking garages in the commercial buildings. The Project will also enter into an agreement with the City to waive resident parking stickers for apartment residents on the site.

Comment 9.5

To me if Redgate increases parking facilities and provides (either off site or on site) recreational field's it would be viewed by residents as a direct benefit to them.

Response:

As noted above, the Proponent is now including 120 parking spaces for neighborhood residents within its proposal. The Project also includes several acres of publicly-accessible open space. The character and use of that open space will continue to be refined in discussions with the City and the neighborhood.

Comment 9.6

It is my impression that the Redgate's proposal has addressed the environmental clean-up required on the site adequately with the singular exception of the potential presence of coal dust at the site. Redgate should perform tests to determine if this insidious contaminate exists on the site.

Response:

The Proponent will continue to work with the State, the City and the neighborhood to ensure appropriate environmental remediation at the Site. The Project will fund a Licensed Site Professional ("LSP"), representing the neighborhood, to review the Project's soil and groundwater environmental remediation plans.

Comment 9.7

This resident representative LSP should be routinely posting to a website the goings on and progress of the project. These updates should contain simple language descriptions of contaminates being treated, their potential health hazard, and just how the process being employed at the site is eliminating the risks to the extent possible the health risks to the residents.

Response:

The Proponent will continue to work with the State, the City and the neighborhood to ensure appropriate disclosure and communication regarding environmental remediation at the Site. The Project will fund a Licensed Site Professional ("LSP"), representing the neighborhood, to review the Project's soil and groundwater environmental remediation plans.

Comment 9.8

Diversity in the housing stock on the site should be more fully explored. With the recent announcement of the Marion Manor property will be sold, the need for additional senior housing in South Boston is becoming acute, and nearing critical. Redgate could add senior housing to the site which would be perceived as benefit to the community allowing elderly residents to stay in South Boston. The problem with this is that in order to be a true South Boston Benefit the application process must include preferential acceptance for the residents of South Boston.

Response:

The updated Project adds 26 affordable apartments targeted at middle-income residents (150% of AMI), raising the on-site affordability of the Project to 16 percent of all housing units. These units would be generally available under the guidelines established by the City of Boston but would include seniors who might otherwise not otherwise be able to remain in the neighborhood. The Proponent will continue to explore the demand for designated senior housing.

Comment 9.9

Affordability of the housing units should be made a greater priority by the proponent across the entire project.

Response:

The Proponent had previously committed to set aside 13 percent of the rental and condominium housing units on site as affordable units. In addition, the Project has now added 26 affordable apartments targeted at middle-income residents (150% of AMI), raising the on-site affordability of the Project to 16 percent of all housing units.

Comment 9.10

A covenant should be instituted with the zoning relief being sought to mandate access remain public to all.

Response:

The Proponent will continue to work with the City and the State on the appropriate legal and regulatory restrictions to ensure permanent public access.

Comment 9.11

The revenues gained from parking meters and ticketing will become the sole asset and revenue stream of Redgate. These revenues should be shared with the community in some manner. Perhaps 1% could be placed into a fund for the South Boston residents to utilize for improvements and beautification across South Boston. Planting trees, park maintenance and landscaping of intersections would in my opinion be some of the uses of these funds.

Response:

The public or private ownership of the streets within the Site, and the rights and obligations of the Proponent therein, remain the subject of continuing review by the City of Boston.

Comment 9.12

The addition of a parking facility should be made part of the plan, but this will eat-up nearly all the surplus real-estate on the site, therefore the mitigations in my opinion should by and large be off site.

Response:

The Proponent is proposing 120 parking spaces be reserved for night and weekend parking by neighborhood residents within the commercial parking facilities anticipated for the Site. These facilities will have the capacity to serve this purpose outside of standard work hours. This will avoid the need for a stand-alone facility.

Comment 9.13

Items like the improvement of the sidewalks on both sides of 1st street is one such benefit I would support. Completion of the M street park fencing is another. Establishment of a community room for civic organization use and the arts is yet another. Setting aside a structure for the greater community use will assist in this developments goal of integration into the neighborhood.

Response:

The Proponent has now committed to widening the sidewalks on both sides of East 1st Street. The Proponent looks forward to continuing discussions with the community on the use of the civic and cultural spaces to be located within the Project, especially those that support the Project's "arts and industry" program focus. The Project will also give priority consideration to local South Boston businesses within the retail spaces on the site

Letter 10: Anna White

Comment 10.1

South Boston needs more deeply affordable units so people of all means can continue to call this neighborhood home.

Response:

The Proponent had previously committed to set aside 13 percent of the rental and condominium housing units on site as affordable units. In addition, the Project has now added 26 affordable apartments targeted at middle-income residents (150% of AMI), raising the on-site affordability of the Project to 16 percent of all housing units

Comment 10.2

I do not believe this project has enough usable active recreation space. All of South Boston's active recreation sites are overcapacity already. How will the developers address this?

Response:

The Project includes 5.5 acres of publicly-accessible open space. The character and use of that open space will continue to be refined in discussions with the City and the neighborhood.

Comment 10.3

As a part of their mitigation, I would like the developers to fund a transit study that would find the true cost of expanding the Red Line to City Point and the cost of extending the Silver Line to City Point. I think that is an option that should be explored before 1000+ units are built.

Response:

Based on numerous discussions with City and State officials, the Proponent has focused its transportation mitigation on potential improvements to MBTA bus service for the neighborhood, especially the Number 7 bus route. A transit mitigation plan been developed in coordination with City and State agencies and includes infrastructure improvements at traffic signals to prioritize transit and result in more reliable travel times, and improvements at bus stops. Furthermore, the Proponent has reduced development program to include 750 residential units.

Letter 11: Eileen Smith

Comment 11.1

My suggestions for future planning must include continued air and noise monitoring.

Response:

The Proponent will continue to work with City officials to design and implement a construction mitigation plan that addresses community concerns, including air quality and noise. Future construction impact mitigation commitments will be captured through the development of Construction Management Plans for each phase.

Comment 11.2

Advanced notification of all demolition processes and permitting should be noticed to residents in local newspapers.

Response:

The Proponent will continue to work with City officials to design and implement a construction mitigation plan that addresses community concerns, including air quality and noise. That plan will include provisions for notices to and communication with the neighborhood.

Comment 11.3

Additionally, a publication notice of team member information must be available to all residents for future contact.

Response:

The Proponent's public filings to date all include team member information and the construction management plan will continue to contain appropriate contact information for communication with the community.

Comment 11.4

Proposed demolition should not be from 7am to 7pm including Saturdays.

Response:

All demolition and construction will be done in accordance with the schedule limits and other work rules required by the City of Boston.

Comment 11.5

who will be policing this development and will the development have their own police department.

Response:

The Project is developed to function as any public neighborhood and will be policed by the Boston Police Department.

Comment 11.6

There needs to be more open green space with trees similar to Castle Island where one can enjoy looking at the ocean's calming waters and landscape.

Response:

The proposed waterfront open space will celebrate the industrial history of South Boston's working waterfront. This site will be a unique open space, distinct from the other waterfront experiences in Boston. The Overlook is a high point along the waterfront edge, providing views to the city skyline from the site. A series of terraces, ramps, and steps bring visitors down to the level of the water. A boardwalk will create an immersive experience, allowing access to the water, native plantings, and the observation deck. Much of the site's historical remnants and industrial character will be preserved and incorporated into the new design.

Comment 11.7

Consideration should be given to trolleys being placed on 4th Street to L Street along Summer Street to South Station and rotating back and forth.

Response:

Based on numerous discussions with City and State officials, the Proponent has focused its transportation mitigation on potential improvements to MBTA bus service for the neighborhood, especially the Number 7 bus route.

A transit mitigation plan has been developed in coordination with City and State agencies and includes infrastructure improvements at traffic signals to prioritize transit and result in more reliable travel times, and improvements at bus stops.

Comment 11.8

Additionally, I believe returning outgoing buses to 4th street will generate a better traffic flow.

Response:

Based on numerous discussions with City and State officials, the MBTA would be the appropriate party to consider bus routes changes.

Comment 11.9

Currently, 4th Street is one way from Farragut to P Street. Making it one way all the way to L Street would allow an easier flow of buses not being stopped at the L and East Broadway traffic light.

Response:

Based on numerous discussions with City and State officials, the City of Boston would be the appropriate party to consider local street network changes.

Comment 11.10

I would like to see a street analysis for not returning buses to E 4th Street.

Response:

Based on numerous discussions with City and State officials, the MBTA would be the appropriate party to consider bus routes changes.

Comment 11.11

There is a strong need for a number 7 bus on Sundays.

Response:

Based on numerous discussions with City and State officials, the Proponent has focused its transportation mitigation on potential improvements to existing MBTA bus service for the neighborhood.

Comment 11.12

The current project design for vehicle access is unacceptable. There needs to be additional street entrances other than M Street and Elkins Street for vehicular traffic. Additional street entrances on 1st Street are needed. As suggested, another new entrance on 1st Street could follow behind building blocks A, F and H with a left turn at the end which would take one through the development and exit onto Powerhouse Street.

Response:

The site access points were developed to minimize disruptions to the vehicular, pedestrian and cyclist flow along Summer Street and East 1st Street and were located to form four- way intersections connecting into the City neighborhood pattern. For the best pedestrian and cyclist experience, minimizing the conflict points (i.e. fewer vehicular

entry/exit points) is important. As was outlined in the DEIR/DPIR, there is minimal queuing anticipated on the site access points as currently proposed.

Comment 11.13

Instead of hotels, it would be nice see a nursing home and/or assisted living facility, a smaller office building and a much larger parking lot with discounted parking for South Boston residents.

Response:

The Proponent continues to evaluate the mix of residential uses that might be located at the site over time. The Project will provide 120 parking spaces to neighborhood residents on nights and weekends at a discounted rate within the parking garages in the commercial buildings.

Comment 11.14

The proposal includes 13% for affordable housing. This is an insignificant amount of affordable housing and must increase.

Response:

The Project adds 26 affordable apartments targeted at middle-income residents (150% of AMI), raising the on-site affordability of the Project to 16 percent of all housing units.

Comment 11.15

A dedicated museum in the Belco building reflecting the Edison history would be a welcome addition.

Response:

A historical exhibit and display, open to the public and dedicated to the history of the site has been planned in the South side of Turbine Hall 2 directly adjacent to the Elkins Street passage. One of the original turbines is being preserved and will be the centerpiece of the exhibition space. Photographic displays and historic documents will also be on display. The entrance will be located off of Elkins Street.

Comment 11.16

Also, a historical trade school on site offering real job opportunities could benefit our neighborhood.

Response:

The Proponent will continue to explore other opportunities to connect with the proud industrial history of the site.

Letter 12: J.F. Bennett

Comment 12.1

As this development ages and maintenance costs increase it will become less attractive to investors and those who do buy in will be less willing to ante up the increased costs of major repairs and upgrades. When this happens who will end up paying for necessary upkeep? If an area as large as this, in the midst of our neighborhood, goes into decline what effects will that have on the surrounding area? What guarantee do we have to protect our long-term investment in our community?

Response:

As for any large, multi-building development project such as this, the Proponent intends to establish long-term agreements that will set standards for the maintenance and upkeep of the shared and public spaces on the site and that will ensure long-term financial support for that effort and expense. The management and financial responsibility will remain with the owners and future owners of the site.

Comment 12.2

Where do the laws of the Commonwealth and the ordinances of the city stand regarding liability and civil rights on this sort of POPS (Privately Owned Public Space) How much does the average citizen understand about these hybrid spaces? If for example a union or other group feels the need to picket or protest a business on the Edison Development land on one of the private ways, can Redgate or it's designated "common area entity" force the removal of these picketers from the entire development? What of liability responsibility? How is police authority modified?

Response:

The public or private ownership of the streets within the site, and the rights and obligations of the Proponent therein, remain the subject of continuing review by the City of Boston.

Comment 12.3

What mechanisms do the city and state have in place to guarantee all public realm agreements are completely fulfilled?

Response:

The Proponent will continue to work with the City and the State on the appropriate legal and regulatory restrictions to ensure permanent public access.

Comment 12.4

Not having a street across the north face of the buildings between them and the 1.5 acre open space fronting the Reserved Channel creates a sense of private front yard for the businesses located there. A narrow street there creating an extension of, possibly, Powerhouse street across Summer St. fronting the No. 1 Turbine Room and the BELCo building (and perhaps the remaining section of the No. 1 Boiler Room) then running to join another street at the eastern border of the property would open up the park space creating a true sense of shared amenity rather than outdoor seating for private business.

Response:

The waterfront open space is designed as a pedestrian-oriented park meant to benefit the larger adjacent neighborhood that currently has no access to the water. The addition of a street in front of the Turbine Halls would reduce the amount of public open space and separate the neighborhood from the waterfront. Given the change in elevation that occurs between the building facades and the water, the area required to create a road would consume a large portion of what is currently a waterfront open space. The public retail and restaurants that line the ground floors of the buildings leading to and fronting this open space are intended to create a shared public amenity rather than a privatized space. The public nature of the open space is also reinforced by the walking paths and bike routes that run through it from the adjacent streets.

Comment 12.5

In my, admittedly unsophisticated reading of the PRMP for the Fan Pier I got the idea that passive open space adjacent to properties can be assigned to those businesses for their use, that must not be allowed to happen here.

Response:

The intent of this Project is to provide a 2.5-acre public waterfront open space accessible to the public. The Proponent will continue to work with the City and the State on the appropriate legal and regulatory restrictions to ensure permanent public access.

Comment 12.6

Actual full, intermodal streets allowing all modes of transportation fully integrated into the surrounding, established street grid would work best to tie this development in the greater community.

Response:

The Project has worked to provide a fully intermodal street network by providing wide sidewalks, bike lanes and provisions at the intersections internal (M Street at Elkins Street) and external (M Street at East 1st and Summer Street at Elkins Street)

that ensure movements for all users. These improvements combined with improvements along East 1st Street and Summer Street will ensure the safety and connectivity of all users around the site.

Comment 12.7

A real benefit for this community stemming from this development would be the narrowing of First St, in conjunction with the already outlined widened sidewalks. Since rail and truck traffic no longer needs First Street (First Street is wider than the other east-west streets because it once had a rail line down it servicing the heavy industries located there. Narrowing First St. would benefit the neighborhood by slowing down traffic and creating a safer and more inviting environment for pedestrians and bicyclists.

Response:

In response to input from the City and the community, the Proponent will now be widening sidewalks on the north and south sides of East First Street, adding bicycle lanes and adding traffic calming/pedestrian safety improvements to the intersection of East First Street and M Street. These changes will create a safer and more inviting environment for pedestrians and bicyclists on East First Street.

Comment 12.8

Summer St. should be narrowed to one auto lane each direction like L St. the traffic signals should be timed to further slow traffic during rush hour, although transit priority signally should be in place. First St., likewise would be narrowed to the width of our other east/west streets by the widening of its sidewalks. It is patently unfair for the BPDA & Redgate/Hilco to talk about shared streets and pedestrian ways within the development without addressing the problematic conditions around the site.

Response:

The Project has designed the improvements along Summer Street in order to provide the optimal multimodal environment consistent with the City plans for the Summer Street corridor. Likewise, improvements along East 1st Street are focused on providing multimodal connections while maintaining parking. Reconstruction of Summer Street and East First Street in accordance with City design guidance is an integral part of the Project.

Comment 12.9

You can't keep adding more cars and buses to a finite road infrastructure. The only solution for the long term is light rail.

Response:

The analysis contained in this document demonstrates that the Proponent's mitigation can and will address the additional traffic impacts of the Project. With respect to public transit improvements, based on numerous discussions with City and State officials, the Proponent has focused its transportation mitigation on potential improvements to existing MBTA bus service for the neighborhood.

Comment 12.10

If the streets within the development are not a public asset, available to all, at all times, then residents of the site should not be issued South Boston parking permits.

Response:

The public or private ownership of the new streets internal to the site remains under discussion with the City of Boston. However, the Project will enter into an agreement with the City to waive resident parking stickers for apartment residents on the Site.

Comment 12.11

Interior parking should be required to be below grade or above occupied ground floors.

Response:

In the current masterplan, most of the parking has been placed below grade or on above grade levels. Only portions of Building A and F have parking at grade and that has been placed along the backs of the building away from front doors and active streets.

Comment 12.12

Some part of this development should be set aside for a moderately sized parking structure free to all South Boston residents with a South Boston parking permit twenty four hours a day, seven days a week, paid for with a small surcharge on the rents or condo fees of all market rate units on site.

Response:

The Project will provide 120 parking spaces to neighborhood residents on nights and weekends at a discounted rate within the parking garages in the commercial buildings.

Comment 12.13

If this site is to remain private property, who is going to police it and what authority will they have over persons traversing the site? To whom will they be accountable? What recourse will a member of the public have in case of a conflict?

Response:

The Proponent will continue to work with the City and the State on the appropriate legal and regulatory restrictions governing public access to and use of the Site. Policing will be the responsibility of the Boston Police Department, as it is in the rest of the surrounding neighborhood.

As for any large, multi-building development project such as this, the Proponent intends to establish long-term agreements that will set standards for the operation, use, maintenance and upkeep of the Project's shared spaces. Establishing and enforcing rules regarding delivery and commercial vehicles will be important to the successful operation of the Project, as well as to the neighborhood.

Comment 12.14

Will there be security cameras? If so who will have access to the footage and for what purpose? How long will it be saved?

Response:

Refer to response to Comment 12.13

Comment 12.15

Will Boston police or Massport police patrol the site? What will be the level of that coverage if any? How will their authority be affected by the fact that it's private property?

Response:

Refer to response to Comment 12.13. Policing will be the responsibility of the Boston Police Department, as it is in the rest of the surrounding neighborhood.

Comment 12.16

In this era of increased violence against the public what liability is Redgate/Hilco willing to accept regarding public safety? How much thought, regarding violence against public gatherings, have the designers put into the design of their pedestrian only, shared streets and boardwalks?

Response:

Refer to response to Comment 12.13

Comment 12.17

I mention this again: What of the right of citizens to peaceably assemble: to protest or picket a business on site for example?

Response:

Refer to response to Comment 12.13

Comment 12.18

Who will oversee enforcement of any rules regarding delivery vehicles and the like? What's to stop delivery trucks from entering the site any way they choose and blocking travels lanes as is done all along the South Boston Waterfront daily?

Response:

Refer to response to Comment 12.13

Comment 12.19

The half of the BELCo plant is to become hall of some sort with one wall replaced by a glass curtain (in the plans presented) While the team claimed the proposed hotels wouldn't have large function rooms it was stated this structure could be used to host events for the hotels!

Response:

The existing 1898 Turbine Hall Building (Building G on the masterplan) is a wonderful tall-ceiling structure with glazed tile interior walls but very few windows. The Project envisions removing the southern deteriorating brick end wall of the building to open the interior to the new Elkins Street and allow natural light into the building. This large glass wall will front the new plaza that is being created on that side of the building. While the interior width of the building is large enough to accommodate several different uses, it is not anticipated as a hotel use, but rather a commercial office function.

Comment 12.20

I would also note the side walls of the turbine rooms were never meant to be exposed to the elements, nor the interior dividing wall of the BELCo building. As a result they have no architectural features on what will be their exteriors. Will they have features such as cornices added? Will the cornice of the north face of turbine room No. 1 be restored? Will it's ornate lanterns be replaced?

Response:

Yes, the exposed elements and lanterns of north face of Turbine Hall 1 will be repaired according to the National Park Service Guidelines. In addition, the west face of Turbine Halls 1, 2, and 3 that may never have been exposed to the exterior will be

assessed once the larger metal building is demolished. The current design assumes the addition of some limestone detailing and banding along the pedestrian passage in keeping with the character of the existing historic buildings.

Comment 12.21

I am disheartened that no effort seems to have been made to preserved the unique and beautiful remains of the original sections of the EEICo boiler room walls facing the Reserved Channel and Summer St.

Response:

The Proponent has carefully evaluated the feasibility of restoration and re-use of all of the existing buildings and elements on the site. The proposed plan reflects that careful evaluation of what can appropriately be done.

Comment 12.22

Since so much of the space currently set aside is at risk of loss to the harbor, I feel Redgate must supply more open space. They must provide enough space to counteract the increased demand on our public parks that their residents will create.

Response:

Only a small portion of the open space, the boardwalk and wetland plantings, will flood in extreme weather events. These areas are designed to handle inundation. Beyond the terraces, the ground plane will all be raised to elevation 21.46, Coastal Flood Protection elevation, which is two feet higher than Boston's projected sea level rise for 2070.

The amount of street trees and green landscape elements has been increased in the current masterplan to soften some of the areas designated for seating and small events. In addition, the courtyard behind Building B has been opened up to pedestrian access from East 1st Street and Elkins Street to increase porosity and flow through the site.

Comment 12.23

A nice, small park could be created in the shadow of a saved Boiler house wall along Summer St. I would also propose a large adult organized playspace on the roof of a building onsite: basketball or touch football, maybe a batting cage to take some pressure off the playing fields of M St. Park.

Response:

The boiler plant building at the corner of East 1st Street and Summer Street will be demolished in the current plan and replaced with Building C that is set back from Summer Street to allow for a gracious sidewalk and bike lanes but not as far back as

the existing boiler plant wall. A small open space can be considered along Summer Street at the entrance of the pedestrian passage between the low-rise and higher-rise portions of the new building C. The character and use of the generous amount of open space created on the Site remains open to continuing discussion with the City and the neighborhood.

Comment 12.24

It's important that when all is said and done that any agreements and promises must be enforceable by a legal mechanism. The community must have a way to hold Redgate/Hilco and any successor firms to all agreements and those agreements made permanent.

Response:

The Proponent will continue to work with the City and the State on the appropriate legal and regulatory restrictions governing public access to and use of the Site, and other commitments of the Proponent.

3.5 Community Group Comments

Letter 13: Gavin Foundation, Inc.

Comment 13.1

To address the need for affordable housing in South Boston, the developer should commit to a much higher percentage than the 13% minimum City of Boston requirement of affordable housing on site. I strongly believe that this development site should include at least 25% deed restricted affordable units. Housing should be available for a range of income levels, including low income seniors and middle income families.

Response:

The revised Project adds 26 new affordable apartments targeted at middle-income residents (150% of AMI), raising the on-site affordability of the Project to 16 percent of all housing units.

Letter 14: South Boston Arts Association

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

Letter 15: South Boston Open Space and Gate of Heaven Neighborhood Association

Comment 15.1

The proposed development with the combination of Housing, Commercial Space, Office Space, Retail Space and Hotel Space is of immense concern to residents. The traffic, parking problems and congestion in the area is already at a critical point. The addition of this proposed development would create a nearly impossible situation for residents and those who use the already crowded streets for their personal lives and business;

Response:

As now proposed, the overall scale of the Project has been reduced by 150,000 square feet and the proposed housing units are reduced by almost half or 44 percent, (from 1,344 units to a maximum of 750 residential units).

The Project commits to a series of traffic and transit improvements targeted at two issues of priority community concern: improving the frequency and reliability of MBTA bus service and increasing pedestrian safety within the neighborhood. Additionally, the Project commits to a series of pedestrian and bicycle improvements that will improve safety and mobility in and around the Site. The reduction in scale of the project, combined with the planned mobility improvements are expected to minimize project impacts. Further, the Project has increased the residential parking ratio to one space per unit and will provide 120 parking spaces to neighborhood residents on nights and weekends at a reduced rate to alleviate pre-existing neighborhood parking concerns.

Comment 15.2

The primary subject of this comment set, however, is the risk to the neighborhood's residents, especially children, from the known contamination associated with demolition, decommissioning, remediation and redevelopment of an old, coal burning power plant.

Response:

As detailed in the DEIR/DPIR under Section 6.6 of Chapter 6, *Environmental Protection*, of the removal of contaminated materials is carefully regulated by the Massachusetts Department of Environmental Protection ("MassDEP") in accordance with Massachusetts General Laws Chapter 21E. The Proponents will continue to work with MassDEP and comply with the testing, planning and removal requirements for hazardous materials to ensure the health and safety of residents and workers at the Site.

Comment 15.3

The specific issues are: (a) Establishing a complete picture of the hazardous substances within the coal plant buildings, both qualitative and quantitative, and in the on-site soil and groundwater within the plant property boundaries. The residents want the assessments to be done immediately and results made available to residents before demolition is carried out. This includes each contaminant and its exact location on the site. Residents want the testing on plant surfaces carried out, the results made available within 90 days of this letter. At that time, another public meeting must be called to discuss results and review specific plans.

Response:

As detailed in the DEIR/DPIR under Section 6.6 of Chapter 6, *Environmental Protection*, the removal of contaminated materials is carefully regulated by MassDEP in accordance with Massachusetts General Laws Chapter 21E. The Proponents will continue to work with MassDEP and comply with the testing, planning and removal requirements for hazardous materials to ensure the health and safety of residents and workers at the Site. Further, the Project will fund an LSP, representing the neighborhood, to review the Project's soil and groundwater environmental mediation plans.

Comment 15.4

In terms of the increased congestion that must result from this project in any form, consider use of a ferry terminal (such as the one that is part of the casino development in Everett), and innovative "people mover" solutions like a monorail to the MBTA. The Developer must pay for these additional solutions to ease the increased crowding, traffic and parking issues bound to result from it. One immediate suggestion is to consider utilizing existing untapped capacity on inbound buses from South Station that come to City Point during AM peak hours and from City Point during the PM, essentially empty. Utilizing this existing infrastructure will keep bus emissions the same. Also, consider any other means of minimizing exhaust emissions from vehicles.

Response:

The Project has modified the building program to shift space from residential square footage to commercial square footage. This modification will result in reducing the number of peak direction trips to the site and increase the number of off-peak direction trips to the site, essentially shifting to use more of that untapped capacity mentioned in the comment.

Furthermore, the Project has proposed a series of traffic and transit improvements to address the frequency and reliability of MBTA bus service. Refer to response to Comment 1.21 for additional detail on the proposed transit improvements.

Letter 16: South Boston Neighborhood Development Corporation

Comment 16.1

The revised development proposal includes over 1,300 units of housing. To address the need for affordable housing in South Boston, the developer should commit to at least 25% affordable housing on this site. Housing should be available for a range of income levels, including low income seniors and middle income families

Response:

The revised project adds 26 new affordable apartments targeted at middle-income residents (150% of AMI), raising the on-site affordability of the Project to 16 percent of all housing units.

Letter 17: Power House Company / BSC Group

Comment 17.1

A study area comprising fourteen (14) intersections (both signalized and unsignalized) was analyzed. It is important to note that Power House Street and 803 Summer Street driveway unsignalized intersections were not included in the 14 intersections analyzed. Turning movement counts from 8/16 were included in the Appendix for the Power House Street intersection but the intersection was not included in the analysis. Given the volume of FedEx trucks and the number of parking spaces that use Power House Street, the Proponent should include an analysis of this intersection.

Response:

The Project worked with the City of Boston to determine the appropriate study area for the project analysis. The implementation of traffic signalization at the intersection of Summer Street at Elkins Street will create gaps in the traffic stream to assist traffic exiting Power House Road.

Comment 17.2

Traffic data was collected for the study area intersections in June 2017. It is important to note that the Dedicated Freight Corridor (DFC) did not open until Fall 2017. It appears that supplemental traffic data was collected for the Summer Street/DFC/FedEx driveway in October 2017 and June 2018 and included in the Appendix. Based on our observations, it appears that the current volumes exceed those included in the analysis.

Response:

Supplemental traffic data was collected in the Fall of 2017 to reflect Freight Corridor activity. In addition, traffic associated with other developments that have been

proposed for this area have been layered onto the roadway network, and the counted traffic volumes were increased by a factor of 0.5 percent per year, for 13 years to reflect any other unforeseen variances in the traffic patterns and allow for a conservative analysis.

Comment 17.3

Crash history was provided for the 5-year period from 2011 to 2015 and stated that all study area intersections have calculated crash rates that fall below the District 6 average values for signalized and unsignalized intersections. In July 2018, there was a fatal accident at the intersection of Street and East 6th Street. Several traffic and safety improvements have been implemented in the L Street corridor since July that should be considered in the Proponent's analysis.

Response:

The DEIR/DPIR presented a crash analysis based on the latest available information from the State's database. The MassDOT database may not fully account for all crashes reported to the Boston Police Department ("BPD") or Boston Emergency Medical Services ("EMS"). A request for additional data from these sources has been made but, as of the time of the filing that document, no additional information has been received.

After the noted fatality, the City has implemented safety improvements at and near that location. Along L Street, the City restriped many of the lane markings and crosswalks to make the paint more visible, restricted parking 25-35 feet from intersections with the use of paint and bollards at the intersections of L Street at East 6th Street and L Street at East 7th Street, installed a digital speed sign on L Street northbound and southbound approaching East 6th Street, and painted medians to narrow lanes at the intersections of L Street at East Broadway and L Street at Emerson Street. All of these traffic calming measures were added with the goal of reducing vehicle speeds along L Street and improving pedestrian safety.

Consistent with Vision Zero Boston, the Project plans for roadways on the site and plans for improvements on adjacent streets take a people-first approach to transportation. The needs of pedestrians and bicyclists, the more vulnerable road users, have been taken into account through wider sidewalks and the provision of bicycle lanes wherever possible. The roadways internal to the site are being designed targeting a low speed limit.

The Proponent is committed to working with the City and the neighborhood to further the implementation of Vision Zero programs related to traffic calming and pedestrian safety improvements along the L Street corridor beyond the Project site boundary, from East 1st Street to Day Boulevard, and along East 1st Street.

Comment 17.4

No queue analysis summary was provided for the 2024 Build Mitigated Condition or the 2030 Full-Build Mitigated Condition. The Proponent should provide a queue

analysis summary for the 2024 Build Mitigated Condition or the 2030 Full-Build Mitigated Condition.

Response:

Queue analysis summaries were provided as part of the DEIR/DPIR Appendix.

Comment 17.5

The graphical representation of the modeled queues shown on Figures 5.17a through 5.17h only show the queues at the L Street/Broadway and L Street/Summer Street/ East 1st Street intersections. Currently, the morning peak hour queues from the Summer Street/Drydock Avenue/Pappas Way extend to the Summer Street/DFC intersection. The Proponent should show graphically the queues at the Summer Street/Elkins Street, Summer Street/DFC/FedEx driveway and Summer Street/Drydock Avenue/Pappas Way intersections to show how the queues interact and to determine if the queues will affect operations at other signalized intersections in the study area.

Response:

As requested by MassDOT vehicle queueing at the Summer Street/Elkins Street, Summer Street/DFC/FedEx driveway and Summer Street/Drydock Avenue/Pappas Way intersections was evaluated in Table 5-7, Table 5-11, Table 5-15, Table 5-24, and Table 5-28 of the DEIR/DPIR. These intersections were not represented graphically because they were not identified as locations where project mitigation was necessary, so only the intersections with mitigation were shown graphically in Figures 5.17a through 5.17h. For details regarding the queues at these locations, please refer to the tables listed above.

Comment 17.6

It is important to note that recent changes have been made to the L Street/Broadway and L Street/Summer Street/ East 1st Street intersections, A right-tum lane has been added to the East 1st Street westbound approach and all legs of both intersections have been signed No Tum on Red. The Proponent should update the analysis to include these recent changes and modify the mitigation commitment as required.

Response:

The recent roadway changes have been reflected in the updated traffic analysis model. Chapter 2, *Transportation,* outlines the impacts and proposed mitigation measures.

Comment 17.7

As part of the Massachusetts Department of Transportation (MassDOT) review of the Environmental Notification Form (ENF), MassDOT stated that "the DEIR should include sufficiently detailed conceptual plans (minimum of 80-scale) for proposed roadway

improvements in order to verify the feasibility of constructing such improvements. These plans should clearly show proposed lane widths and offsets, Layout lines and jurisdictions, and land uses adjacent to areas where improvements are proposed." No detailed conceptual plans were included in the DEIR/DPIR submission. These detailed conceptual plans are required to adequately review the proposed roadway and signalized intersection improvements and their impacts, if any, on the King Terminal property. The Proponent should provide detailed conceptual plans as requested by MassDOT.

Response:

Conceptual Improvement Plans will be developed in coordination with MassDOT as part of the forthcoming FEIR filing.

Comment 17.8

Further discussion of the proposed signal at Summer Street/Elkins Street is required to fully understand the intersection operations and any potential impacts to the King Terminal property. Elkins Street is a private way that provides access to FedEx and the King Terminal buildings and parking. Elkins Street also connects to East 1st Street via K Street. The Proponent should present solutions to prevent Elkins Street from becoming a cut-through to East 1st Street.

Response:

The intersection of Summer Street/Elkins Street is going to be timed to be coordinated with the intersection of Summer Street/East 1st Street so that no benefit will be realized by cutting through K Street. In addition, the cut through route along K Street includes significant friction in the form on perpendicular parking that would reduce the benefit of using it as a cut through route. Furthermore, signage limiting access to Elkins Street westbound from the site driveway will be implemented.

Letter 18: Boston Harbor Now

Comment 18.1

To ensure that Conley Terminal operations and other related maritime businesses are not adversely impacted, the final PIR should clearly define "service vehicles," specify any potential time of day restrictions, limit the use of the DFC to off-peak truck traffic hours, and describe gates or security checkpoints under consideration.

Response:

The Proponent will continue to work with Massport to identify measures to ensure that Conley Terminal operations and other related maritime businesses are not adversely impacted.

Comment 18.2

The Draft PIR includes new details for the proposed public areas along the northern edge of the site, closest to the DFC. We understand the design challenge—given the nature of marine industrial operations nearby—and encourage the team to more carefully consider the layout and programming of the public areas along this edge. They must reconcile two very different uses-- general public use and the continued industrial operations of Conley Terminal and other working port businesses. The final PIR should do more to describe and depict details of the observation deck, waterfront boardwalk, waterfront plaza, performance plaza, and overlook.

Response:

The waterfront open space within the Project Site will function as a public open space and will celebrate the industrial history of South Boston's working waterfront. The overlook is a high point along the waterfront edge, separated by eight feet of grade change from the adjacent road. A planted buffer is proposed between this area of the open space and the DFC to provide a visual and acoustic screen. A series of terraces, ramps, and steps bring visitors down to the level of the water. A boardwalk will create an immersive experience, allowing access to the water, native plantings, and the observation deck. The proposed design preserves the industrial remnants of the site and incorporates existing material into the new open space. The waterfront plaza and performance plaza are conceived as flexible spaces, to be used for community events, art festivals, markets, and music performances. The observation deck allows visitors to get out into the water and provides views from below the level of the DFC. This development will not impact the adjacent marine industrial operations.

Comment 18.3

There are five existing MBTA bus routes within walking distance (10 minutes or less) of the project site—route 5, 7, 9, 10, and 11. Only one, Route 7, has a stop immediately

adjacent to the property along Summer Street and is the only bus option for inbound service across the Reserve Channel to the Seaport and Downtown. As confirmed by the Draft PIR, during peak commuting hours this route is near capacity and does not operate at all on Sundays. While we appreciate the proponent's willingness to kick off a supplemental bus service as soon as site demolition begins in 2019, we have questions about the proposed pilot program. For example, additional information about management, staffing, schedule of operation, and incorporation of the pilot into existing bus tracking technology should be provided in future project filings.

Response:

The Proponent commits to a series of traffic and transit improvements targeted at two issues of priority community concern: improving the frequency and reliability of MBTA bus service and increasing pedestrian safety within the neighborhood. Additional details on the proposed traffic and transit mitigation can be referenced in Section 2.7, Chapter 2, *Transportation*. The Proponent will continue to work with the BPDA and the MBTA to determine the details of the proposed transit mitigation and logistics.

Comment 18.4

With the nearest T station more than a 10-minute walk from the site, increased access to public transportation is a critical issue that needs to remain a priority for this project. We encourage collaboration with the MBTA to fund expanded or enhanced service in this route, especially with a city proposal to add a bus only lane to Summer Street. We look forward to additional transportation discussions as the project progresses.

Response:

The Project will continue to collaborate with the MBTA and City of Boston to implement traffic and transit mitigation to improve mobility, access and safety. Additional details on the proposed traffic and transit mitigation can be referenced in Section 2.7, Chapter 2, *Transportation*.

Comment 18.5

Finally, this 15-acre site and development is large enough to warrant a new Blue Bikes station. We are pleased to learn that the proponent is committing to installing at least one additional Blue Bike Station dock at this location.

Response:

The Proponent commits to providing Blue Bikes on-site in accordance with BTD guidelines for bikeshare accommodations and will continue working with the BPDA and BTD to determine the most appropriate station placement and number of docks.

Comment 18.6

Design detail and strategies that embrace the City of Boston's district-scale solution should be a priority for climate resiliency at this site. We look forward to reviewing additional resiliency measures proposed in the Final PIR and continuing to refine site design measures as the project progresses.

Response:

The Project team will continue to assess specific resiliency strategies as part of the PDA Development Review for each building. Please see the response to Comment 3.8 for additional information.

3.6 Public Comments

Copies of public comment letters are provided in Appendix B for reference. Because many of the letters expressed a similar array of concerns, global responses to these letters are provided by topic below. The public comments and concerns fall into the following key categories:

1. Height/Scale/Massing;
2. Transportation (bus service, traffic);
3. Programming;
4. Affordable Housing;
5. Construction Impacts; and
6. Parking.

The responses below aim to address each key community issue and refer to specific sections of the SID for further information.

Comment Theme 1: Height/Scale/Massing

Example comments

The project density is too high and has not been amended to conform to the nature and character of the neighborhood at large.

The scale and scope of the development remain too big to be accommodated into a residential neighborhood as proposed. At 1.93 millions square feet of new development, this is comparable to adding the square footage of the John Hancock Tower to City Point.

Response:

The overall size of the Project has been reduced by approximately 150,000 gross square feet and now proposes a 1.78 million square feet mixed-use development spread over approximately 15 acres. In order to support enhanced integration with the existing neighborhood, the buildings along East First Street have been reduced in height from seven stories to five stories. Taller buildings are located in the center of the site and now allow for a mix of commercial uses that are compatible with Conley Terminal and support the continued growth and success of the Flynn Cruiseport. The resultant massing, arrangement and uses of buildings is less imposing and more neighborhood-friendly than the existing powerplant structure that stands six feet from the curb and rises above Summer Street.

The Project takes further steps to ensure that it will knit into the fabric of the neighborhood along East 1st Street by creating a new pedestrian connection on the east site of the Turbine Halls, adding to the options for neighborhood residents to explore the Site's open spaces and access to the waterfront. The reconstruction of East 1st Street will now include wider sidewalk and street trees on both the north

and south sides of the street, further supporting the integration with the existing neighborhood network.

Comment Theme 2: Traffic and Transportation

Example comments

The developer needs to consider alternative modes of public transportation (extending the silver line, water shuttles, trams to the seaport) to control the influx of traffic in City Point.

Consequent to indiscriminate development in South Boson, public transportation is already stretched to the breaking point, and truck traffic from the port area - currently being expanded - has made exiting/entering South Boston via Summer St. a traffic nightmare at peak hours, and, as we have recently seen, dangerous.

The increase in traffic as a result of this project, estimated to be between 8,000 to 10,000 trips a day per the proposal, would overwhelm an already overburdened the local streets and road ways.

Response:

The Proponent has been working closely with the BPDA, BTD, and the MBTA to determine the most appropriate transit and traffic mitigation measures. While this project will be adding vehicles to the surrounding roadways, the impacts will be added slowly over a 10-15 year build out.

The Proponent proposes certain physical and operational transportation improvements to mitigate the transportation related Project impacts. These mitigation measures include the following:

- Creation of a new 4-leg intersection with new traffic signals at Summer Street at Elkins Street Extension. The intersection will accommodate adaptive signalization, connectivity, transit priority and more efficient pedestrian walk time distribution. ADA accessible ramps will be provided at all 4 corners in addition to crosswalks and bicycle appropriate striping.
- Creation of a new 4-leg intersection at East 1st Street and M Street Extension. The intersection will accommodate vehicles, bicyclists and pedestrians with ADA accessible ramps at all 4 corners, crosswalks and bicycle striping will also be included. The intersection will be enhanced with a Rectangular Rapid Flashing Beacon (RRFB) to alert drivers to slow down and enhance and improve safety at the crosswalks for pedestrians and bicyclists.
- Creation of a new access point from the Project site to Conley's Dedicated Freight Corridor, to be used for commercial/service truck access only which would limit truck activity on Summer Street and East 1st Street.
- Construction of internal roadways in line with City standards, that accommodate vehicles, bicyclists and pedestrians. The additional roadways will break up the

parcel and provide more travel route opportunities for both site users and the community and make it possible to access the waterfront.

- **Traffic / Ped / Bike Improvement** - Re-construction of Summer Street along property boundary (between DFC and East 1st Street) to accommodate vehicles, on-street parking and active drop-off/pick-up curb space, separated bike lanes, a wide sidewalk with trees and upgraded bus stops.
- **Traffic / Ped / Bike Improvement** - Re-construction of East 1st Street along property boundary (between Summer Street and City Point western driveway) to accommodate vehicles, on-street parking and bike lanes, where possible. In addition, the reconstruction will include widening of the southern (non-Project side) sidewalk from Summer Street/L Street to Acadia Street, to improve safety and enhance pedestrian experience for site users and neighbors.
- **Traffic / Ped / Bike Improvement** - Upgrade of traffic signal equipment at the intersection of Summer Street and East 1st Street to accommodate adaptive signalization, connectivity, transit priority and more efficient pedestrian walk time distribution.
- **Neighborhood Traffic Improvement** - Re-Striping of East Broadway (between L Street and M Street) to add an additional travel lane in the westbound direction, while preserving on-street parking on both sides.
- **Neighborhood Traffic Improvement** - Upgrade of traffic signal equipment at the intersection of L Street and East Broadway to accommodate adaptive signalization, connectivity, transit priority and more efficient pedestrian walk time distribution.
- **Traffic Signal Connectivity (Vehicle and Transit Improvement)** - Enable adaptive signals capabilities, including transit signal priority and signal connectivity, to allow traffic signals to communicate with each other and/or communicate with the City of Boston Traffic Management Center, as required through the City's Smart Utilities Policy. Connectivity to be enabled along the Summer Street/L Street corridor between Drydock Avenue and East Broadway.
- **Project Transit Improvement** - Upgrade two bus stops within the Project Site to include shelters, fare vending machines and Mobility/MicroHubs with real-time transportation information screens.
- **Neighborhood Transit / Bus Stop Improvements –** Work with the MBTA to improve bus stops along the L Street/Summer Street corridor, beyond the Project Site, focused on improved frequency and reliability of service, including installation of new AFC 2.0 Fare Vending Machines. These improvements are in addition to the bus stop improvements at the 2 site specific stops.
- **Neighborhood Transit / City Point Improvements** - Work with the MBTA to design and implement improvements to increase the layover and passenger handling capacity of City Point Terminal.
- **Bicycle Facilities** - Installation of three BlueBike stations on-site in highly visible locations such as near bus stops and Mobility/MicroHubs (two proposed on Summer Street and one proposed on East 1st Street near City Point), with an option to install a fourth BlueBike station, if enough demand, to serve Project site

residents, employees, visitors and the neighborhood at large. Final station locations will be defined in coordination with City's BlueBike coordinator and will depend on availability of appropriate sun exposure, as stations are solar powered.

› **Neighborhood Safety Improvements** - Work with BTD to further the implementation of Vision Zero programs related to traffic calming and pedestrian safety improvements along the L Street corridor beyond the Project site boundary, from East 1st Street to Day Boulevard, and along East 1st Street.

These improvements are projected to improve future transit and other vehicle demand processing more efficiently through the study intersections. In addition, the Proponent is committing to an on-going monitoring program that examines the traffic, transit and parking impacts of each Project Phase to the neighborhood, as it is built out. The intent of the monitoring program is to confirm that the post-development impacts of the Project are consistent with the forecast estimates and to ensure that the mitigation measures are completed and/or maintained. The monitoring program is expected to include employee and resident surveys, collection of traffic counts and parking garage counts and occupancies. The implementation of the proposed mitigation measures, TDM measures, parking accommodations, and on-site amenities will also be verified.

Comment Theme 3: Programming

Example comments

What about a plan to plant trees in the indoor corridors? What about a decent dog park and not patch?

Southie needs a cultural center. There are tremendously talented local artists and a neighborhood who enthusiastically supports the arts including visual arts as well a music, drama, and writing/poetry. Please include space for art expression and appreciation for the community in the Edison plant project.

Response:

The revised Project increases street trees and plantings at numerous locations on and around the site. A dog recreation area is planned for the area between Blocks A and F near the residential areas of the Project.

The renovated Turbine Halls will have many different types of flexible spaces that can be used for arts events including performances, exhibits, readings and installations. In addition, the Project will be creating a History Museum on the south side of Turbine Hall 2 next to one of the original turbines in the building.

The outdoor spaces of the Project including passageways, streets and open spaces designed to allow and encourage art installations of various sizes and types.

Comment Theme 4: Affordable Housing

Example comments

To address the need for affordable housing in South Boston, the developers should commit to at least 25% affordable housing on site before they are allowed to build hotels and office space. Affordable apartments for our seniors should be a part of any proposal for the site.

South Boston Deserves a higher percentage of affordability than the City requires in order to address the desperate need for housing that working people and the elderly can afford. We do not need more luxury housing; we need ownership and rental opportunities for working families and deeply affordable housing for the elderly.

Response:

The updated Project adds 26 affordable apartments targeted at middle-income residents (150% of AMI), raising the on-site affordability of the Project to 16percent of all housing units. These units would be generally available under the guidelines established by the City of Boston but would include seniors who might otherwise not otherwise be able to remain in the neighborhood. The Proponent will continue to explore the demand for designated senior housing.

Comment Theme 5: Construction Impacts

Example comments

During the demolition and construction, it was stated that the hours would be 7am till 7 pm six days a week. Even with the mufflers mentioned that seems egregious.

However, my primary concern is the danger to all residents when dangerous substances are released into the area when development starts.

What I am requesting is that Redgate doubles or even triples their efforts to control the rodent problem.

Response:

Construction Management Plans ("CMPs") will be prepared for each phase of the Project to address temporary construction-related impacts. The CMPs will detail such things as construction schedule, work hours, rodent control, number of construction workers, worker transportation and parking, and number of construction vehicles and routes. A draft CMP for the Project was presented in Appendix G of the DEIR/DPIR. As each phase of development progresses through design and into the construction phase, the respective construction managers will refine and expand the respective CMPs in order to address sub-phases and reflect the input of the regulatory authorities having jurisdiction over CMPs.

Additional information on construction-related impacts was provided in DEIR/DPIR Chapter 6, *Environmental Protection*.

Comment Theme 6: Parking

Example comments

Parking for residents, guests, and customers is insufficient in light of the proposed uses for the property at the scale to which they are proposed.

There is still not enough parking and the developer is not planning on building the total volume of provided parking supply they outline in the proposal, falling short on the residential condos (1.5 parking ratio).

Response:

As now proposed, the Project re-balances the mix of uses at the Site to 60 percent commercial uses and 40 percent residential uses and reduces the overall size of the project by 150,000 square feet. This use shift reduces the on-site parking demand and provides the opportunity for shared parking by use type. This change enables the Project to provide 120 parking spaces to the neighborhood residents on nights and weekends at a discounted rate, within the parking garages of the commercial buildings. A temporary surface parking solution will be provided along Summer Street after Site demolition but prior to the construction of the commercial buildings, to provide near term parking relief for the neighborhood. In addition, the Project now commits to an increased parking ratio of one spot per residential unit across all unit types (up from .5 spaces per apartment unit as previously proposed). The Project will also enter into an agreement with the City to waive resident parking stickers for apartment residents on the Site.

PUBLIC REALM

Seating Grove

Buffer Zone

Overlook

Urban Mews Plaza

Urban Mews Entry Plaza

Waterfront

Turbine Alley

Art Tunnel

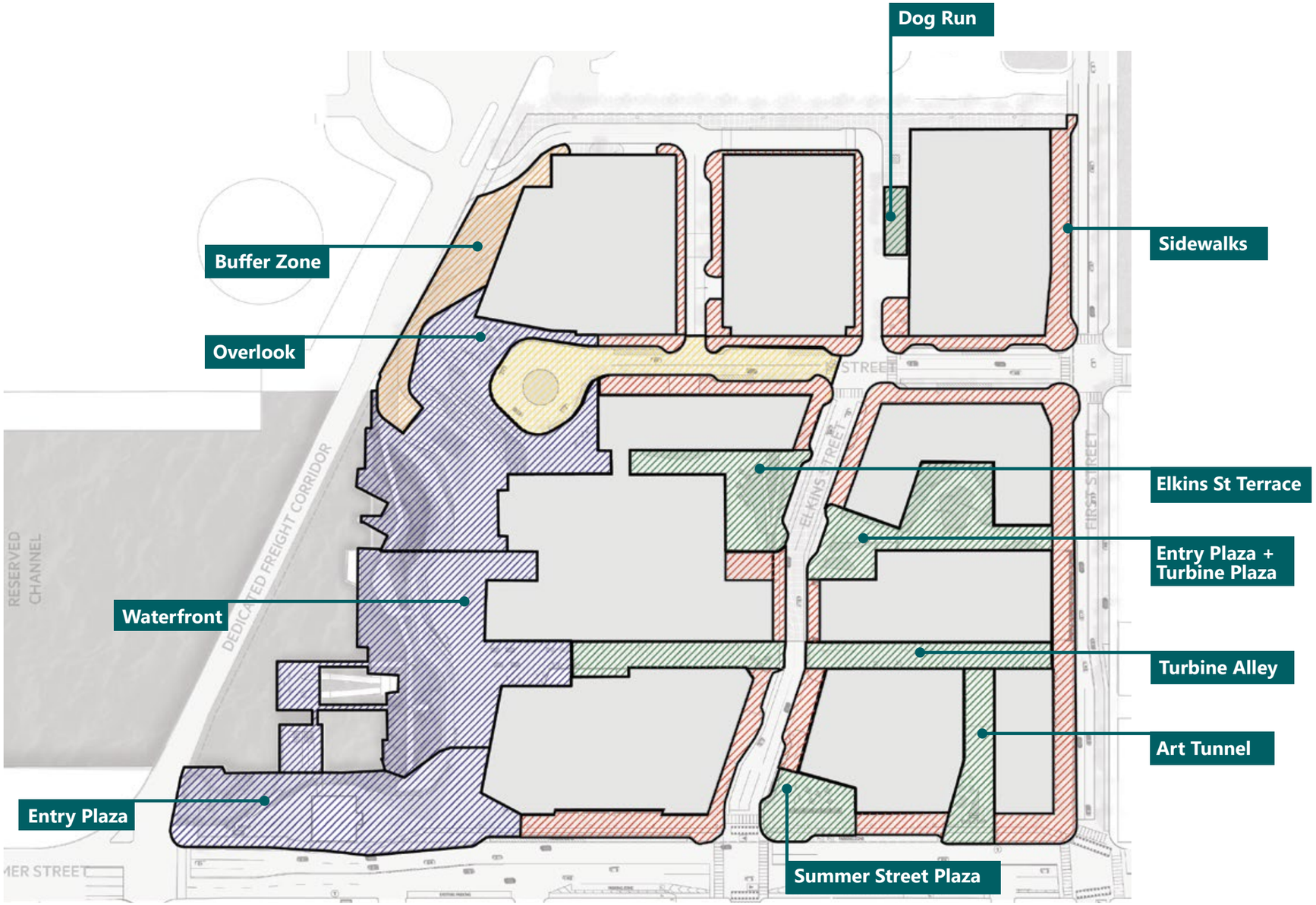
Pier Overlook

Entry Plaza

Summer Street Plaza

N

Figure 3.1a Public Open Space Plan



Public Open Space

- Waterfront
- Plazas + Pedestrian Corridors
- Sidewalk

Additional Open Space

- Curbless Paved Road
- Buffer Zone

N

Figure 3.1b Public Open Space Diagram

LEED v4 for Neighborhood Development Plan
Project Checklist

Project Name: 776 Summer St
Date: 6/24/2019

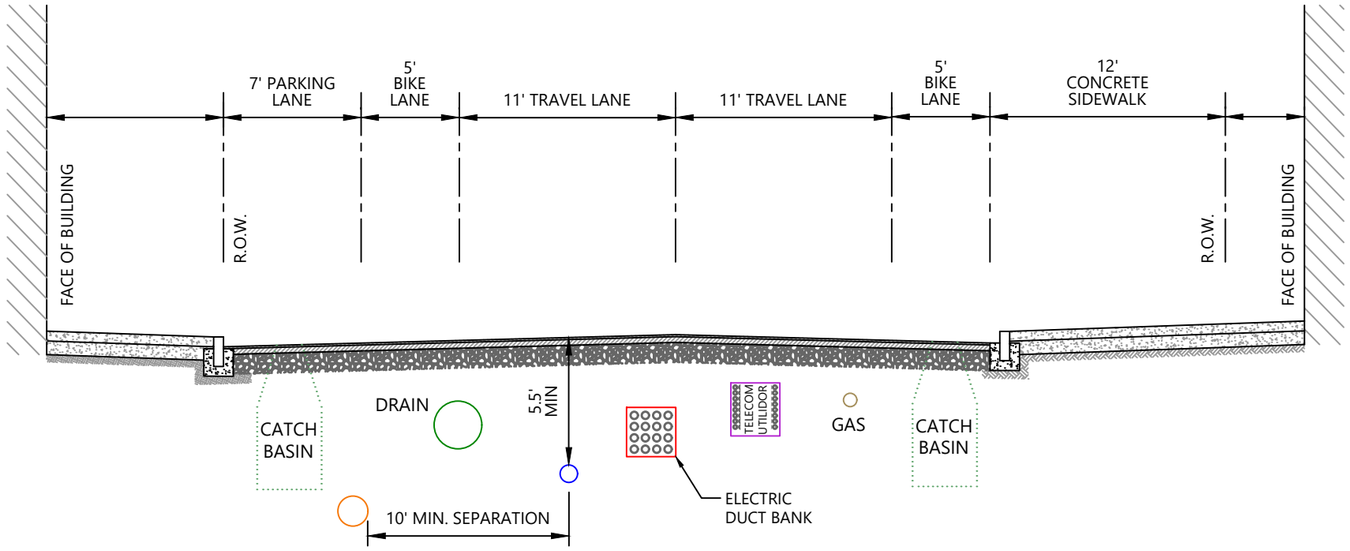
Yes	?	No			
13	**15**	**0**	**Smart Location & Linkage**		**28**
Y			Prereq 1	**Smart Location** (Ownership)	Required
Y			Prereq 2	**Imperiled Species and Ecological Communities** (Civil)	Required
Y			Prereq 3	**Wetland and Water Body Conservation** (Civil)	Required
Y			Prereq 4	**Agricultural Land Conservation** (Civil)	Required
Y			Prereq 5	**Floodplain Avoidance** (Civil)	Required
5	5		Credit 1	**Preferred Locations** (LEED Coordinator)	10
	2		Credit 2	**Brownfield Remediation** (Civil)	2
3	4		Credit 3	**Access to Quality Transit** (LEED Coordinator)	7
2			Credit 4	**Bicycle Facilities** (Architect)	2
2	1		Credit 5	**Housing and Jobs Proximity** (Ownership)	3
1			Credit 6	**Steep Slope Protection** (Civil)	1
	1		Credit 7	**Site Design for Habitat or Wetland and Water Body Conservation** (Civil)	1
	1		Credit 8	**Restoration of Habitat or Wetlands and Water Bodies** (Civil)	1
	1		Credit 9	**Long-Term Conservation Management of Habitat or Wetlands and Water Bodies** (Ownership/ Civil)	1
14	**14**	**5**	**Neighborhood Pattern & Design**		**41**
Y			Prereq 1	**Walkable Streets** (Architect/ Landscaping)	**Required**
Y			Prereq 2	**Compact Development** (Ownership/ Architect)	**Required**
Y			Prereq 3	**Connected and Open Community** (LEED Coordinator)	**Required**
	1		Credit 1	**Walkable Streets** (Architect)	**9**
3	3		Credit 2	**Compact Development** (Ownership/ Architect)	**6**
4			Credit 3	**Mixed-Use Neighborhoods** (LEED Coordinator)	**4**
	4	3	Credit 4	**Housing Types and Affordability** (Ownership)	**7**
	1		Credit 5	**Reduced Parking Footprint** (Architect)	**1**
2			Credit 6	**Connected and Open Community** (LEED Coordinator/ Architect)	**2**
	1		Credit 7	**Transit Facilities** (Ownership)	**1**
		2	Credit 8	**Transportation Demand Management** (Ownership)	**2**
1			Credit 9	**Access to Civic & Public Space** (Architect/ LEED Coordinator)	**1**
1			Credit 10	**Access to Recreation Facilities** (Ownership)	**1**
1			Credit 11	**Visitability and Universal Design** (Architect)	**1**
	2		Credit 12	**Community Outreach and Involvement** (Ownership)	**2**
	1		Credit 13	**Local Food Production** (Architect/ Landscaping)	**1**
2			Credit 14	**Tree-Lined and Shaded Streetscapes** (Landscaping)	**2**
	1		Credit 15	**Neighborhood Schools** (Ownership)	**1**

Yes	?	No			
12	**19**	**0**	**Green Infrastructure & Buildings**		**31**
Y			Prereq 1	**Certified Green Building** (Ownership/ LEED Coordinator)	**Required**
Y			Prereq 2	**Minimum Building Energy Performance** (Energy Modeler)	**Required**
Y			Prereq 3	**Indoor Water Use Reduction** (Plumbing Engineer)	**Required**
Y			Prereq 4	**Construction Activity Pollution Prevention** (Civil)	**Required**
5			Credit 1	**Certified Green Buildings** (Ownership/ LEED Coordinator)	**5**
1	1		Credit 2	**Optimize Building Energy Performance** (Energy Modeler)	**2**
1			Credit 3	**Indoor Water Use Reduction** (Plumbing Engineer)	**1**
	2		Credit 4	**Outdoor Water Use Reduction** (Irrigation Consultant/ Landscaping)	**2**
1			Credit 5	**Building Reuse** (Architect)	**1**
	2		Credit 6	**Historic Resource Preservation and Adaptive Reuse** (Architect)	**2**
1			Credit 7	**Minimized Site Disturbance** (Civil)	**1**
	4		Credit 8	**Rainwater Management** (Civil)	**4**
1			Credit 9	**Heat Island Reduction** (Architect/ Landscaping)	**1**
	1		Credit 10	**Solar Orientation** (Architect)	**1**
	3		Credit 11	**Renewable Energy Production** (Energy Modeler)	**3**
2			Credit 12	**District Heating and Cooling** (Mechanical Engineer)	**2**
	1		Credit 13	**Infrastructure Energy Efficiency** (Energy Modeler)	**1**
	2		Credit 14	**Wastewater Management** (Civil)	**2**
	1		Credit 15	**Recycled and Reused Infrastructure** (Architect)	**1**
	1		Credit 16	**Solid Waste Management** (Ownership)	**1**
	1		Credit 17	**Light Pollution Reduction** (Exterior Lighting Designer)	**1**
1	**2**	**3**	**Innovation & Design Process**		**6**
	2	3	Credit 1-4	**Innovation** (LEED Coordinator)	5
1			Credit 5	**LEED® Accredited Professional**	1
0	**0**	**0**	**Regional Priority Credits**		**4**
			Credit 1	**Regional Priority Credit: Region Defined**	1
			Credit 2	**Regional Priority Credit: Region Defined**	1
			Credit 3	**Regional Priority Credit: Region Defined**	1
			Credit 4	**Regional Priority Credit: Region Defined**	1
40	**50**	**8**	**PROJECT TOTALS (Certification estimates)**		110

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

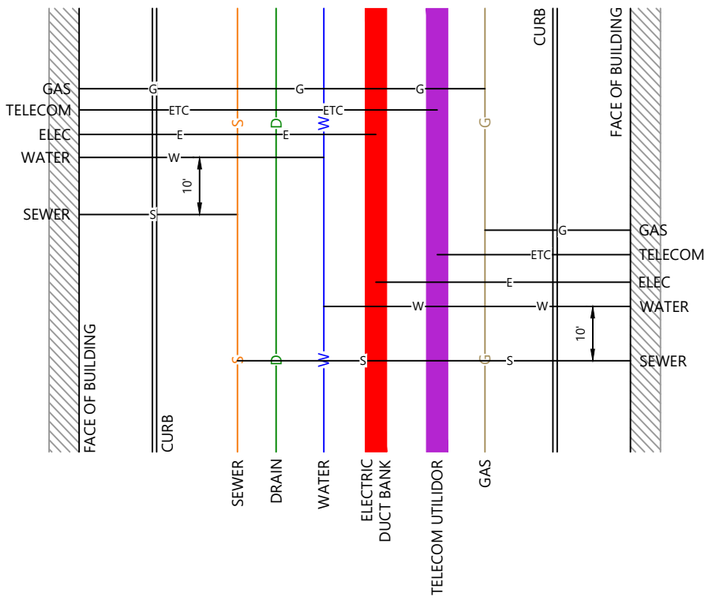
Figure 3.2
LEED Scorecard

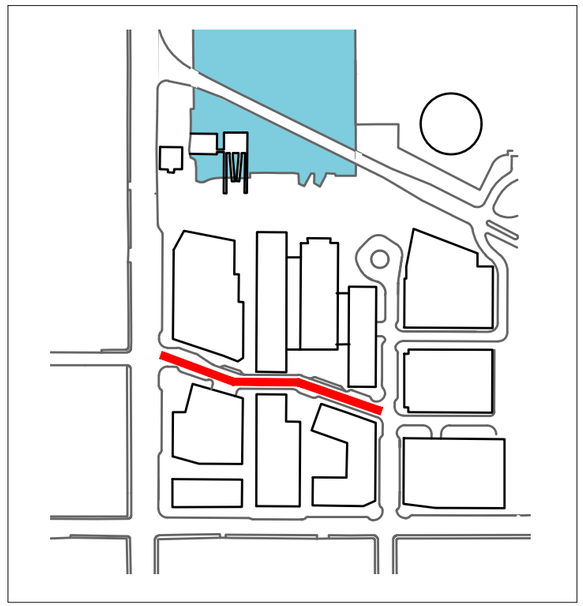
L Street Station Redevelopment
Boston, Massachusetts



PRIMARY ROADWAY (TYPICAL)

NOT TO SCALE





Key Map

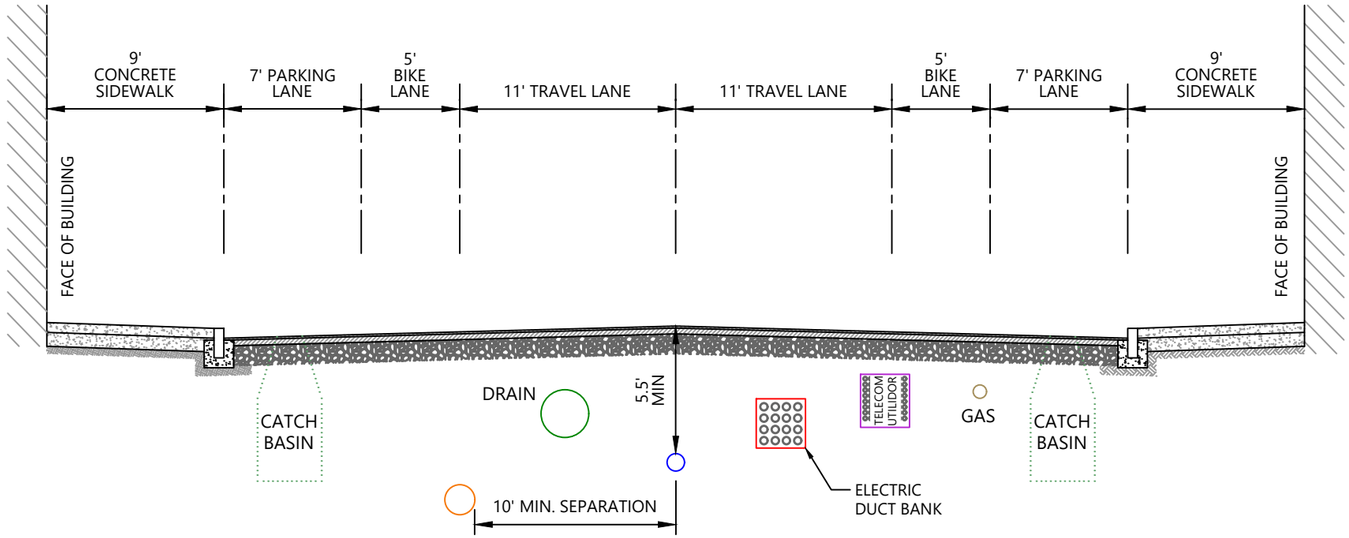
NOT TO SCALE

Note:

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

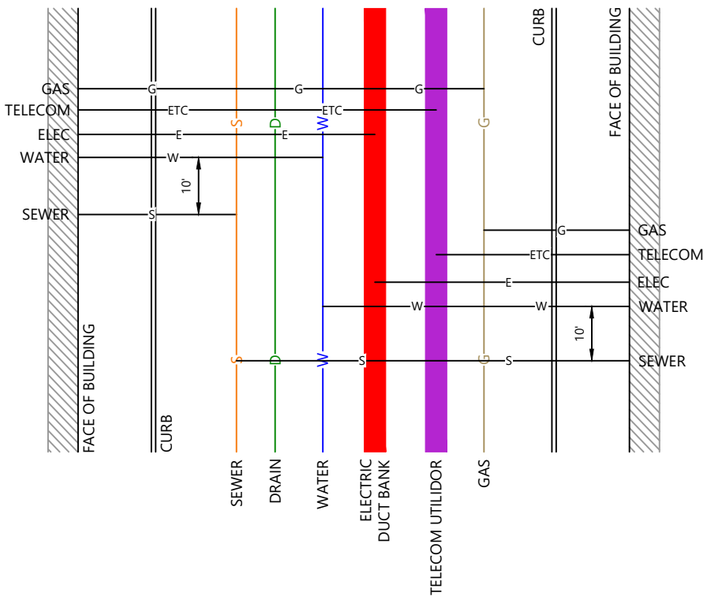
Figure 3.3b
Conceptual Cross Section (Elkins Street Extension)

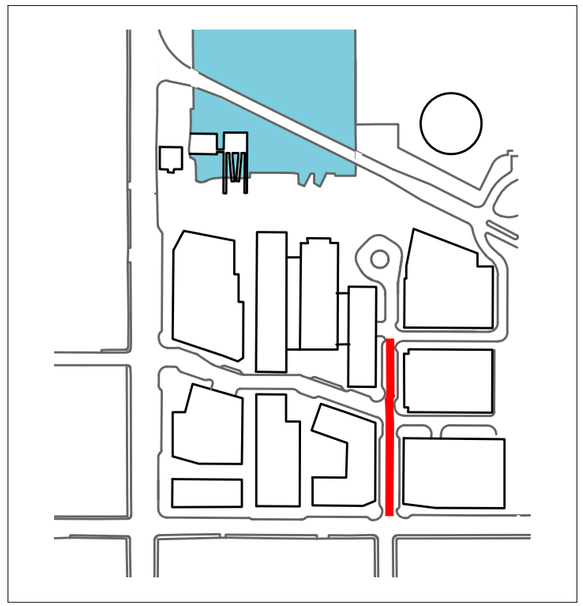
L Street Station Redevelopment
Boston, Massachusetts



PRIMARY ROADWAY (TYPICAL)

NOT TO SCALE





Key Map

NOT TO SCALE

Note:

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

Figure 3.3a
Conceptual Cross Section (M Street Extension)

L Street Station Redevelopment
Boston, Massachusetts

Source: Stoss Architects

Figure 3.4
Conceptual Green Infrastructure

L Street Station Redevelopment
Boston, Massachusetts

Appendix A: Agency, Organization and IAG Comments

BOSTON PLANNING & DEVELOPMENT AGENCY

REQUEST FOR SUPPLEMENTAL INFORMATION
776 SUMMER STREET

SUBMISSION REQUIREMENTS
FOR SUPPLEMENTAL INFORMATION REQUEST

PROPOSED PROJECT:	776 SUMMER STREET
PROJECT SITE:	15 ACRE SITE BOUNDED BY SUMMER STREET, EAST FIRST STREET, MBTA LAND, AND THE RESERVED CHANNEL, SOUTH BOSTON
PROPONENT:	HRP SUMMER STREET LLC
DATE:	DECEMBER 27, 2018

The Boston Redevelopment Authority ("BRA") d/b/a The Boston Planning & Development Agency ("BPDA") is issuing this Supplemental Information Request in response to the Draft Project Impact Report ("DPIR") which HRP Summer Street LLC (the "Proponent") filed for the 776 Summer Street project on August 16, 2018. Notice of the receipt by the BPDA of the PNF was published in the Boston Herald on August 16, 2018 which initiated a public comment period which ended on October 30, 2018.

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

On January 8, 2018, the BPDA issued a Scoping Determination. On August 16, 2018, the Proponent filed a DPIR pursuant to Article 80 Large Project Review. The Proponent proposes to redevelop an approximately 15.2-acre site located at 776 Summer Street in the South Boston neighborhood. The proposal entails approximately 1.93 million square feet of occupiable space, including: approximately 1,344 residential units, approximately 368,070 square feet of office uses, approximately 85,630 square feet of retail uses, 344 hotel rooms, and up 1,397 parking spaces. The proposal will also preserve several historic

buildings on the site and provide 5.5 acres of new outdoor public spaces, including approximately 2.5 acres of open space on the waterfront (the "Proposed Project").

The BPDA hosted publically advertised community meetings regarding the DPIR on September 19, September 26, October 10, and October 24. The BPDA hosted meetings of the Impact Advisory Group ("IAG") on September 26, October 10, and October 24. All meetings were held at the Tynan School in South Boston. The public comment period concluded on October 30, 2018.

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

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

- Congressman Stephen F. Lynch
- State Senator Nick Collins, State Representative David Biele, District 2 City Councilor Ed Flynn, and City Councilor At-Large Michael Flaherty
- Carrie Marsh, Boston Parks and Recreation Department
- Joseph Fleury, Boston Public Works Department

The Proponent should note that several community members, as well as elected leaders representing South Boston, have requested further analysis of commercial and/or industrial alternatives that do not include a housing component.

I. PROJECT DESCRIPTION

The Proposed Project entails approximately 1.93 million square feet of occupiable space, including: approximately 1,344 residential units, approximately 368,070 square feet of office uses, approximately 85,630 square feet of retail uses, 344 hotel rooms, and up 1,397 parking spaces. The proposal will also preserve several historic buildings on the site and provide 5.5 acres of new outdoor public spaces, including approximately 2.5 acres of open space on the waterfront.

II. PREAMBLE

The Proposed Project is being reviewed pursuant to Article 80, Development Review and Approval, which sets forth a comprehensive procedure for project review of the following components: transportation, environmental protection, urban design, historic resources, infrastructure systems, site plan, tidelands, and Development Impact Project, if any. The Proponent is required to prepare and submit to the BPDA a filing with supplemental information that meets the requirements of this request by detailing the Proposed Project's impacts and proposed measures to mitigate, limit or minimize such impacts. After

submitting the supplemental information filing, the Proponent shall publish notice of such submittal. Public comments, including the comments of public agencies, shall be transmitted in writing to the BPDA after the public notice has been published. If the BPDA determines that the filing of supplemental information adequately describes the Proposed Project's impacts and, if appropriate, proposed measures to mitigate, limit or minimize such impacts, the Preliminary Adequacy Determination will announce such a determination and that the requirements of further review are waived pursuant to Section 80B-5.4(c) (iv). Section 80B-6 requires the Director of the BPDA to issue a Certification of Compliance indicating the successful completion of the Article 80 development review requirements before the Commissioner of Inspectional Services can issue any building permit for the Proposed Project.

III. REVIEW/SUBMISSION REQUIREMENTS

In addition to full-size scale drawings, 10 copies of a bound booklet and an electronic copy (PDF format) containing all submission materials reduced to size 8-1/2" x 11", except where otherwise specified are required. The electronic copy should also be emailed to Tim Czerwienski at Tim.Czerwienski@Boston.gov. The booklet should be printed on both sides of the page. In addition, an adequate number of copies must be available for community review. A copy of this request for supplemental information should be included in the booklet for reference. SIR.3

A. General Information

1. Applicant/Proponent Information
   a. Development Team
      (1) Names
         (a) Proponent (including description of development entity and type of corporation, and the principals thereof)
         (b) Attorney
         (c) Project consultants and architects
      (2) Business address, telephone number, FAX number and e-mail, where available for each
      (3) Designated contact for each
   b. Legal Information

(1) Legal judgments or actions pending concerning the Proposed Project

(2) History of tax arrears on property owned in Boston by Applicant

(3) Evidence of site control over Project Site, including current ownership and purchase options, if any, for all parcels in the Proposed Project, all restrictive covenants and contractual restrictions affecting the Proponent's right or ability to accomplish the Proposed Project, and the nature of the agreements for securing parcels not owned by the Applicant.

(4) Nature and extent of any and all public easements into, through, or surrounding the site.

2. Project Site

a. An area map identifying the location of the Proposed Project
b. Description of metes and bounds of Project Site or certified survey of the Project Site.
c. Current zoning

3. Project Description and Alternatives

a. The filing of supplement information shall contain a full description of the Proposed Project and its components, including its size, physical characteristics, development schedule, costs, and proposed uses. This section shall also present analysis of the development context of the Proposed Project. Appropriate site and building plans to illustrate clearly the Proposed Project shall be required.
b. A description of alternatives to the Proposed Project that were considered shall be presented and primary differences among the alternatives, particularly as they may affect environmental and traffic/transportation conditions, shall be discussed.

4. Public Benefits

a. Anticipated employment levels including the following:
   (1) Estimated number of construction jobs
   (2) Estimated number of permanent jobs

b. Current and/or future activities and program which benefit adjacent neighborhoods of Boston and the city at large, such as, child care programs, scholarships, internships, elderly services, education and job training programs, etc.
c. Other public benefits, if any, to be provided.

5. Community Process

a. A list of meetings held and proposed with interested parties, including public agencies, abutters, and business and community groups.
b. Names and addresses of project area owners, abutters, and any community or business groups which, in the opinion of the applicant, may be substantially interested in or affected by the Proposed Project.

B. REGULATORY CONTROLS AND PERMITS

An updated listing of all anticipated permits or approvals required from other municipal, state or federal agencies, including a proposed application schedule shall be included in the filing. SIR.4

A statement on the applicability of the Massachusetts Environmental Policy Act (MEPA) should be provided. If the Proposed Project is subject to MEPA, all required documentation should be provided to the BPDA, including, but not limited to, a copy of the Environmental Notification Form, decisions of the secretary of Environmental Affairs, and the proposed schedule for coordination with BPDA procedure. SIR.5

C. PUBLIC NOTICE

The Proponent will be responsible for preparing and publishing in one or more newspapers of general circulation in the City of Boston a Public Notice of the submission of the filing of supplemental information to the BPDA. Following publication of the Public Notice, the Proponent shall submit to the BPDA a copy of the published Public Notice together with the date of publication. SIR.6

APPENDIX A

COMMENTS FROM BPDA STAFF

MEMORANDUM

TO: Tim Czerwienski, Project Manager
FROM: BPDA Staff
DATE: December 27, 2018
SUBJECT: BPDA Staff Comments on 776 Summer Street Draft Project Impact Report

TRANSPORTATION

In the aftermath of a severe traffic crash resulting in a fatality in the Summer of 2018, several physical changes have been implemented to the transportation network in South Boston. Future transportation analysis should consider all pending, current, and future efforts by City staff for improvements to surrounding streets. Vision Zero should be the paramount consideration for transportation improvements in this district.

Key transportation elements that should be responded to include:

- Number and location/siting of Bluebike stations that are consistent with BTD guidelines for bikeshare accommodations.
- Condition of East First Street that provides better accommodations for cyclists.
- Better connect Butler Park to Summer Street with dedicated bike accommodations. 1.1
- Improve garage and loading access:
  - Elkins Street has the appearance of a loading/parking service road. A better design that minimizes this impact to the public realm is possible.
  - Coordinate with the MBTA about using the City Point Terminal access road to provide loading for Block A and connect this service road to the service road between blocks F and H. 1.2
- Improve the transit analysis, update transit mitigation, and work with the City on shuttle concepts. 1.3

These issues are further articulated in this document.

TDM Management

A comprehensive Transportation Demand Management (TDM) program is vital to ensuring the success of the project site and providing a comprehensive suite of mobility options to individuals working at the site. The Proponent should consider additional measures for mitigating the impacts of vehicle trips to and from the site, including:

- The City welcomes the inclusion of a Mobility microHUB at the Elkins/Summer Street intersection. Mobility microHUBs, a recommendation of Go Boston 2030, should be included in additional locations on the site. This will facilitate efficient use and distribution. 1.4

- The City welcomes the inclusion of designated pick-up/drop-off areas on the project site. As the Proponent continues to refine site design and transportation analysis, the Proponent should work with City staff to help determine the final locations and sizes of these zones. 1.5

- The Proponent should include consolidated bike parking, showers, and repair facilities at key locations on the site. 1.6

- Given the multi-phase nature of this project site, the Proponent should monitor parking demand at each phase of the project and commit to evaluate and refine parking levels with BTD and BPDA before execution of each project phase. This will ensure supply accurately reflects demand and city goals. 1.7

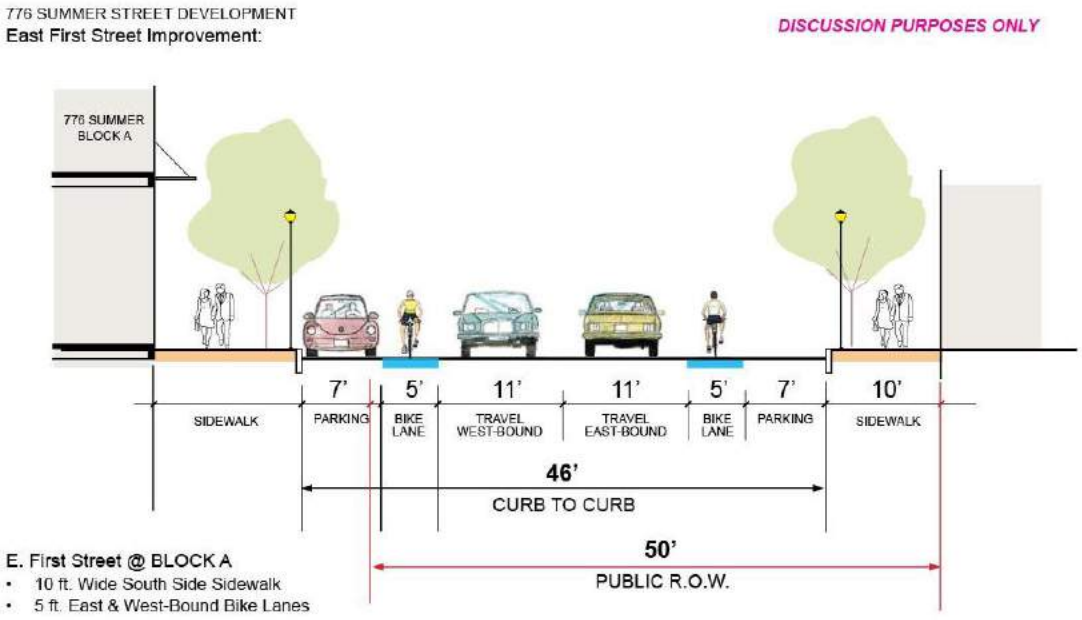
Site Access and Internal Circulation

Efficient site access and internal circulation are vital to the success of the proposed project. Key project considerations should include:

- Continued acknowledgement and discussion of how Vision Zero principles incorporating into this site plan and are the paramount concern at this location.

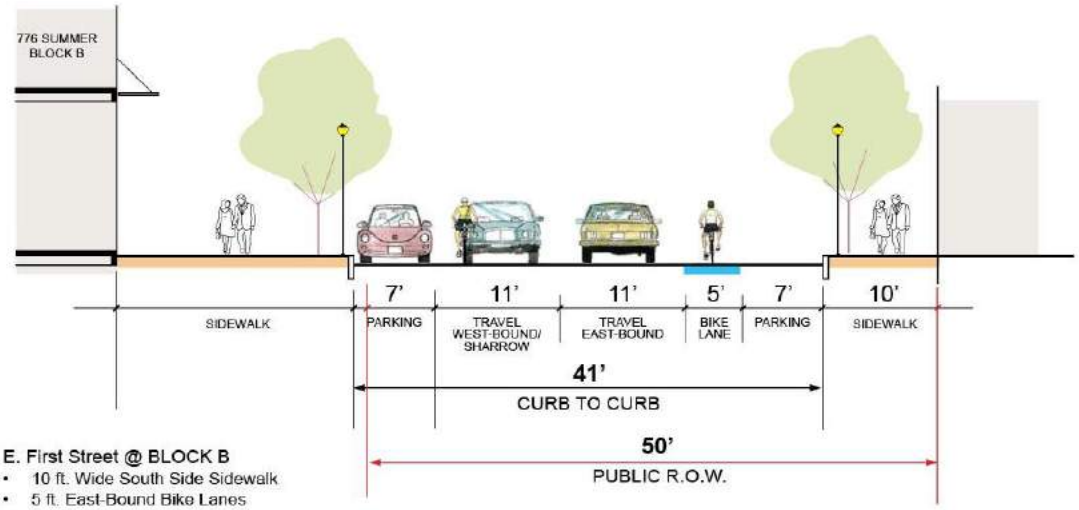
- The Proponent should continue to work with the City on the design for Summer Street and East First Street: 1.8

- The City welcomes the inclusion of a northbound cycle track on Summer Street as included in the 776 Summer Street filing; this key bike corridor will help meet goals outlined in *Go Boston 2030* and aid overall neighborhood safety and mobility. As also noted in the filing, the Proponent should continue to work with City staff on further refinement of the Summer Street design. Improvements to the Summer Street corridor should be consistent with the findings of the Seaport Transit Strategic Plan, anticipated to be released in late 2019; and 1.9
- The Proponent should work with City staff to refine designs for East First Street. This includes recommendations for East First Street cross sections and layout proposed by City staff that would enhance bike and pedestrian accommodations. The following four diagrams from BPDA and BTD staff illustrate layouts for East First Street that provide accommodations for bikes, travel lanes, and parking along with generous sidewalk space. This layout significantly enhances safety for cyclists on the street. 1.10



776 SUMMER STREET DEVELOPMENT
East First Street Improvement:

DISCUSSION PURPOSES ONLY

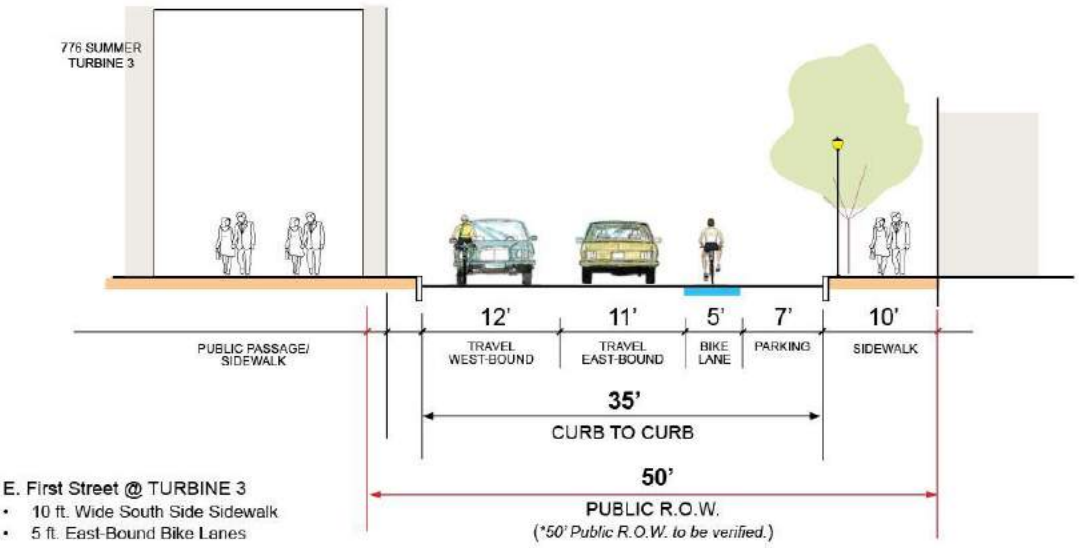


E. First Street @ BLOCK B

- 10 ft. Wide South Side Sidewalk
- 5 ft. East-Bound Bike Lanes

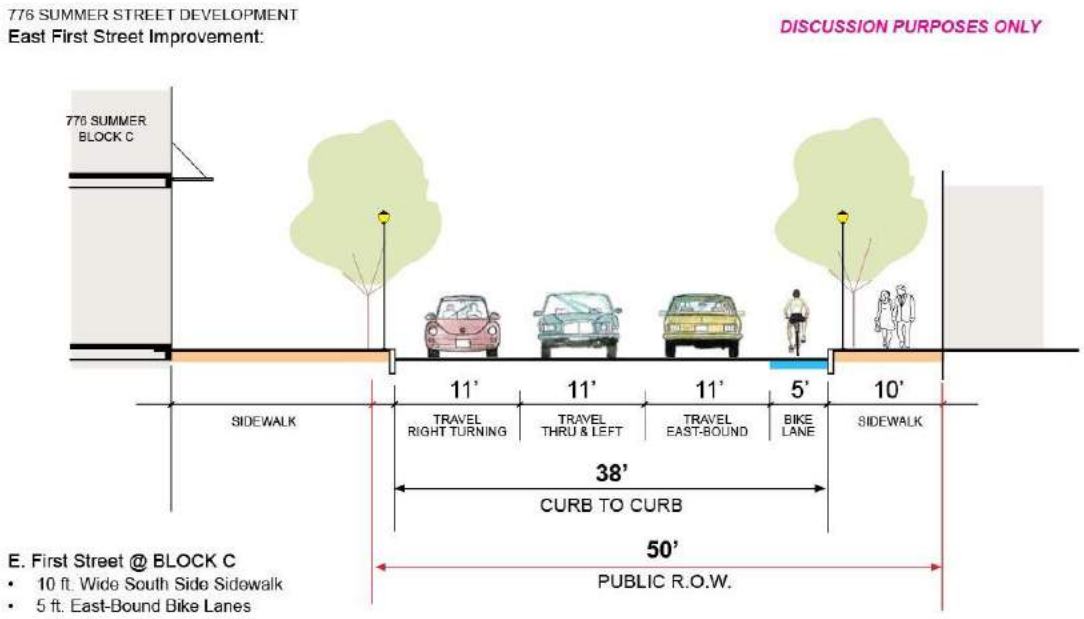
776 SUMMER STREET DEVELOPMENT
East First Street Improvement:

DISCUSSION PURPOSES ONLY



E. First Street @ TURBINE 3

- 10 ft. Wide South Side Sidewalk
- 5 ft. East-Bound Bike Lanes



- The Proponent should further explore access to and use of the Butler Dedicated Freight Corridor. This should include improved access for MBTA vehicles. Allowing MBTA vehicles to use this corridor, particularly for non-revenue moves, will enable vehicles to bypass the Summer Street/East First Street intersection and more efficiently provide peak period service (Scoping Determination, 17). 1.11

- The Proponent should work with the MBTA to better utilize the corridor between the MBTA City Point Bus Yard and the 776 Summer Street project site:
  - Provide loading access to the proposed shared corridor to enable loading access to be moved off of M Street Extension;
  - Bicycle accommodations to enable better connections from the East First Street Corridor to Summer Street; and
  - Access for MBTA buses to the Butler Freight Corridor. 1.12

- The proposed internal street grid remains a concern of City planning, transportation, and urban design staff:
  - The Elkins Street "shared street" approach should be further refined given the primary function of Elkins Street as a main backbone to the project site with relatively high volumes of traffic and loading. A mix of traditional street design with raised areas and plaza demarcations will help reinforce the site design and ensure all users of Elkins and M Streets are safe and comfortable within the larger neighborhood street grid; 1.13

- Loading activity should not occur on the Elkins Street "shared street." Relocating Elkins Street loading away from this important street in the proposed site will free up large swaths of the public realm currently proposed to be occupied by loading docks and zones (Scoping Determination 19). In general, the Proponent should strive to make loading zones and docks as narrow as possible to avoid the impact to the public realm. Further, parking entrances should be limited to 20' wide (zoning minimum) unless justification can be provided by project Proponent; 1.14
- Consider additional treatments for the Elkins Street/Summer Street and M Street/E 1st Street intersections to better accommodate bikes and pedestrians; 1.15
- In general, the City supports alignment between Elkins Street and Elkins Street extension to create a regular intersection; and
- Further, a signal warrant analysis for the East First Street/M Street intersection should be conducted. Given traffic volumes, connectivity to the neighborhood, and anticipated pedestrian and bike crossings, it is likely a signal here is necessary. 1.16

- The Proponent should articulate if new streets on the site are proposed to be public, private, or some combination, and explain the reasoning for this decision. 1.17

- Bike accommodations through the site should be provided on dedicated cycle tracks or bike lanes (Scoping Determination 21). 1.18

- A bike connection to Butler Park should be explored, as outlined in past City comments:
  - Inclusion of grade separated cycle track accommodations through the site either on Elkins/M Street or through the Harbor Park; and
  - Improved intersections for bikes - specifically M Street/East First Street and Summer/Elkins. 1.19

Transit Network and Accommodations

The Proponent provides an extensive transit analysis and proposes a service-based mitigation package. The City proposes further refinement of this analysis and mitigation concept. 1.20

Existing Transit Conditions & No Build Analysis

Existing transit demand in South Boston is substantial and, despite recent service enhancements made by the T, the service continues to experience challenges. Particularly during rush hours, these include bus bunching, delays due to traffic congestion, passenger crowding at bus stops, and missed buses. The result of these challenges is inconsistent conformance with published schedules and bus trips that frequently experience crush conditions.

While an analysis of ridership data may suggest capacity is available for current riders, user experiences will confirm that the existing bus service frequently does not meet existing transit service demand in South Boston.

Identified Project Transit Impacts

The analysis performed for the Draft EIR/PIR examines the existing transit service utilization and capacity, 2024 and 2030 No-Build Conditions, and 2024 Build and 2030 Full Build Condition. Inbound and outbound service during weekday morning and afternoon peak hours on MBTA routes 7, 9, 10, and 11 was studied for this analysis.

Some key findings and notes stemming from the transit analysis are:

- Route 7 buses will not have sufficient capacity to meet future ridership demands, with an anticipated v/c for AM peak inbound buses of 1.0 and a v/c of 1.33 for PM peak outbound buses.[1]
- MBTA bus routes 9, 10, and 11 are expected to be able to accommodate the additional ridership generated by background growth and Project-generated transit trips, under theoretical ideal conditions. This is despite day-to-day user experience to the contrary in these neighborhoods: these routes frequently do not run on schedule and do not necessarily meet current--let alone anticipated future--neighborhood demand. The Proponent acknowledges this fact is not captured in

[1] A v/c of 1.33 on PM peak outbound route #7 buses (ridership of 787 with a capacity of 594) implies that each of the eleven outbound route #7 buses during evening peak have 72 people on board, creating very uncomfortable crush conditions for passengers, especially when coupled with bus bunching, traffic congestion, and dropped runs. Importantly, even a v/c of 1.00 *feels* uncomfortable for riders, with dozens of passengers standing around fully-occupied seats with ridership at these levels.

ridership data yet continues to rely primarily on these data to perform existing and future transit needs analyses.

Included Transit Mitigation

The Proponent has identified limited physical and hardscape improvements that will serve local transit:

- Summer Street reconstruction, creating widened sidewalks and bus stop improvements
- Signal improvements
- Accommodating forthcoming AFC 2.0 fare collection kiosks

To mitigate the identified service gaps and shortfalls in the City Point neighborhood's MBTA bus service, the Proponent has prioritized the development, funding, and operation of an "innovative" supplemental public bus service. This supplemental service would be designed to address current capacity and operational gaps and shortfalls in established MBTA service in South Boston. In the context of the Better Bus Project, this supplemental bus service is proposed as an opportunity to pilot routing options in assisting the MBTA in ongoing service planning. The Proponent reports entering into preliminary discussions with the MBTA regarding this supplemental service and its potential routing.

This bus/shuttle service, however, should be further explored and further refined. Furthermore, the Proponent should perform sufficient analysis regarding key features of the future bus service operations. 1.21

Supplementary Transit Modeling & Mitigation Discussions

This section is organized into comments about modeling methodology, mitigation proposals, physical and hardscape improvements, and the broader mitigation package analysis.

Given MassDOT's and the MBTA's Service Delivery Policy, adopted in January of 2017, the v/c ratio metric used in the submitted transit analysis is not the correct one. Following MassDOT's lead, the project team should provide a fuller picture of transit needs and capacity in the neighborhood given the most current and up-to-date transit analysis

methodology. The following elements should be considered when updating the transit modeshare analysis: 1.22

1. *Go Boston 2030,* Boston's Citywide long-term mobility action plan from 2017, sets aspirational commuting modeshare goals for the City. By 2030, the target is a one-third increase in the percent of Bostonians who commute by public transportation. The Go Boston 2030 report gives the South Boston public transportation modeshare as 36.9%. Therefore, the aspirational value for this neighborhood is 49%. Given the long-term nature of the proposed project, all public transit analysis should be performed assuming the aspirational modeshare of 49% public transit usage instead of approximately 44%, the modeshare currently planned for (given in Table 5-20 of the DPIR).

   Thorough consideration should be given regarding 1) how the proposed project can further the City's goals of reaching this target for site users and the surrounding neighborhoods, and 2) how the proposed project can mitigate impacts on, support, and enhance existing service based on the aspirational modeshare value. 1.23

2. The Draft EIR/PIR notes that existing transit conditions in South Boston are anecdotally worse than what the ridership data might suggest. Bus bunching, delays, overcrowding, and missed runs all contribute to a transit system which does not currently meet the needs of South Boston residents. Further quantified analysis into existing transit issues not captured in provided ridership data, beyond anecdotal and informal field observations, should be completed. 1.24

3. It appears that the Proponent analyzed bus ridership based on the load factor at the bus stop nearest the project site. Doing so does not capture the anticipated route-wide impacts of the proposed project on the public transit system in the neighborhood as a whole. Additional consideration for the downstream users affected by increasingly full buses requires using the "Maximum load" ridership value for a bus run, rather than the load at the stop nearest the project site. 1.25

4. Tables 1 and 2 show the sum of maximum loads of 19 Inbound Route #7 buses during one morning hour and 11 Outbound Route #7 buses during one evening hour. While the Proponent has selected intuitive hours as "peak"--buses that pass the project site between 8:00 and 9:00 am and between 5:00 and 6:00 pm--existing ridership data suggest these are not the true peak hours for Route #7 buses. It is

imperative that future analyses are more considerate to on-the-ground conditions of service and ridership on these bus routes. 1.26

Table 1: Sum of 19 Maximum Loads for Route #7 IB buses in One Morning Hour	
Start Time Ranges	Sum of Maximum Loads
7:55 - 8:55	725.2
7:53 - 8:52 (peak hour analyzed)	748.9
7:49 - 8:48	761.5
7:46 - 8:45	785.7
7:44 - 8:41	**803.9**
7:40 - 8:38	799.6
7:37 - 8:34	800.8
7:35 - 8:31	795.4
7:31 - 8:27	789.1
7:28 - 8:24	791
7:24 - 8:20	771.6
7:20 - 8:17	763.8
7:16 - 8:13	755
7:12 - 8:11	741.2

Table 2: Sum of 11 Maximum Loads for Route #7 OB buses in One Evening Hour	
Start Time Ranges	Sum of Maximum Loads
5:12 - 6:08	462.2
5:06 - 6:02	470.3
5:01 - 5:56	**476.4**
4:55 - 5:50	465.3
4:48 - 5:45 (peak hour analyzed)	466.2
4:40 - 5:39	463.9

5. The proposed project contains a mix of uses whose impacts will not necessarily be fully concentrated during peak times;
    - The evening peak hour v/c on the outbound Route 7 bus in the 2030 Full Build Transit Condition analysis is anticipated to be 1.33, suggesting the severe impacts remain in effect for more than simply the one hour analyzed;
    - It has been conceded that anecdotal and field observations suggest existing transit service does not meet existing transit demand as well as existing data suggest it does, suggesting that, even during off-peak times, there are transit needs that are not captured in existing ridership data that need to be analyzed and addressed; and
    - Off-peak operations of several routes, including the #7, are scaled back significantly, suggesting a need to analyze off-peak needs, connectivity, and access for anticipated users, the transit analysis should consider off-peak needs and operations, including the Route #5 bus (which runs only on off-peak hours) and weekend service of all studied routes. 1.27

Physical and hardscape transit improvements

- In order to alleviate existing and future transit issues and needs, the Proponent should provide complete, substantial, and meaningful physical and hardscape improvements that meet City and MBTA goals and standards to improve existing and future bus service; for example, given that MassDOT concluded there needs to be four additional trips as a result of this development, the proponent should identify the infrastructure improvements make those additional trips feasible. A universe of proposed solutions with an expanded scope which includes all bus routes to and from major nearby MBTA Red Line stations should be explored. This universe of improvements should include, but should not be limited to: 1.28
    - The proponent should investigate the feasibility of dedicated transit-only lanes in the vicinity of the 776 Summer Street site - this could include downstream sites where enhanced bus infrastructure will provide better service for the entire route. Alternatives, including peak hour parking restrictions, shared lanes, and other innovations may be necessary. 1.29
    - Additional transit priority infrastructure should be considered along important bus routes feeding the site. This can include, but should not be limited to, level boarding, transit signal priority, visibility improvements, and

other physical hardscape improvements to increase traffic and transit flow to and from the proposed site. 1.30

- Improvements to the City Point Bus Terminal should be considered as well, including improvements to the passenger waiting/pick-up/drop-off area with public wifi, heating elements, public art, and real-time arrival/departure information. 1.31
- The proponent should build improvements to Summer Street that are consistent with the City's Seaport Transit Strategic Plan and Summer Street Phase 2 design. 1.32

Project Transit Mitigation

1. This proposed universe of hardscape, physical, and service improvements should include a full analysis of the impact it will have on the transportation network in the neighborhood as a whole. This fully quantified analysis of broader transit improvements should demonstrably, fully, and meaningfully mitigate the impacts of the proposed project on its surrounding neighborhood and the existing and future transportation network. 1.33

2. The City appreciates the Proponent's consideration of additional service in the vicinity of the project site. The City will continue to work with the Proponent on service improvements at and around the project site. The Proponent should commit to working with the City once the findings of the Seaport Transit Strategic Plan are finalized. 1.34

Bicycle Network and Accommodations

Safe, comfortable, and connected bike infrastructure for people of all ages and abilities will enable and encourage residents, employees, and visitors to access the site by bicycle. Key elements for consideration should include:

- A two-way separated bike lane along East 1st Street and through the proposed project site to connect Butler Park to a reconstructed Summer Street. Proposed separated bike lanes should be separated with a raised concrete median, though consideration should be documented for raised cycle accommodations at all locations. Consider locating the separated bike lane through the project site behind Buildings A, F, and H and through the waterfront plaza area. 1.35

- Transitions from this separated bike lane to bicycle connections on Summer Street and East 1st Street should be logical, intuitive, and convenient, and should anticipate envisioned bicycle facilities along the project site to not preclude future high-comfort bikeways. 1.36
- Bike "sharrows" should be avoided at all costs on the proposed project site as they do not materially advance the safety and comfort of bicyclists. 1.37
- The City appreciates the addition of a Bluebike station at the plaza near Summer Street/Elkins Street. Additional Bluebikes stations should be provided and shown clearly at several locations throughout the project site consistent with BTD guidelines for projects of this size. 1.38
- Further consideration should be provided for showers and repair facilities for bicyclists in at least each office building, as required by Boston's Off-Street Bicycle Parking Guidelines:
  - One shower/changing facility per office building with 100 planned workers or at least 40,000 square feet. One additional shower/changing facility per every 200 planned workers or 80,000 square feet. 1.39
- Bike Network Modeling should be further refined and conducted by the Proponent. This should include:
  - Existing Conditions
    - Adjusted seasonal bike counts
    - Area Bike Network Inventory
      - Road Network (Existing & Planned)
      - Bikeshare (Existing & Planned)
        - Size of existing Bikeshare stations and rightsizing for future growth
    - Bike Comfort Analysis
    - Bike Connectivity Analysis, including:
      - Jobs
      - Retail
      - Civic Buildings and Parks
  - Future Build/No Build Conditions
  - Future Mitigated Conditions 1.40

Parking and Loading

- More information should be provided regarding the parking and loading access points, including details on parking garage entrances, loading docks, and all other vehicular access points. Special attention should be paid to the impacts of these locations on the public realm in the internal and external areas of the site. Parking entrances should be limited to two drive isles not wider than 20' (Boston Zoning minimum) unless analysis shows a wider entrance is necessary. 1.41

- All parking and loading dock entrances should be consolidated as completely as possible, minimizing the impacts to the proposed project's public realm. Others should be located off Elkins Street and M Street. For example, a consolidated loading scenario for Buildings A, F, and H located to the east of these buildings and off M Street will be encouraged (Scoping Determination 19). 1.42

- As noted in the TDM section, the Proponent should commit to evaluate parking demand with each phase of the project to ensure parking supply meets site demand. The Proponent should evaluate designs that enable future repurposing of parking if demand decreases. 1.43

PLANNING AND URBAN DESIGN

These comments will address the information provided in the DPIR, not the more recent information presented by the development team.

Understanding that a PDA Master Plan is proposed, and therefore it is an unusually large project, the DPIR does not address fundamental Urban Design concerns as directly and clearly as it could, and would benefit from an enhanced exploration of urban design considerations. The following comments are offered to guide additional development of the site. Responses should be directed to the issues raised and provided primarily in graphic form.

Loading and Vehicular Access

- As referenced in the Transportation section of this memo, the Proponent should look at strategies to remove/minimize loading on the Elkins Street extension. This is one of only two streets proposed in the plan, and the amount of service located off of Elkins turns it into a service street rather than a lively extension of city street from the surrounding neighborhood grid. Particular attention should be paid to the Eastern half of Elkins where the loading adversely impacts the adjacent Elkins and Turbine plazas. The creation of a more recessed loading area between Building B and Turbine Hall would help limit the impact on Elkins St. 2.1
- A service alley along the Eastern edge of the site would significantly improve the vitality of M Street and improve site circulation overall. While the buildings on the rest of the site struggle to find to appropriate locations for loading, this edge is ideally suited for back of house access. Whether via easement with the MBTA's existing access road or through the creation of a driveway along the projects own property, this is a key opportunity that will have positive implications across the site. An alternative could be to create a single below grade garage linking Buildings A and F, with access off of the service road between Buildings F and H. 2.2

Public Realm Improvements

- The Summer Street edge should be designed to Boston Complete Street standards in coordination with transportation improvements [i.e. street trees within a permeable furnishing zone, 8' clear path of travel, and robust cycle facilities]. This should be highly coordinated with transportation. 2.3
- Provide cross sections of East 1st Street that coordinate with the plans/cross sections developed as a part of the Butler Street Park buffer, see proposed street layout in the Transportation section of this memo. 2.4
- Provide a break and ideally pedestrian access between Turbine Hall and Block B to increase porosity along East 1st Street. 2.5
- Improve the pedestrian connection between Blocks A and F to connect to future improvements at the adjacent dog park. 2.6
- Look at maximizing the amount of green on the site. At a minimum, provide street trees along Elkins and M Street Extensions, and increase greenscape along the waterfront open space and the proposed open space at Block E. In general, hardscape should be reduced significantly. Trees can help to provide a comfortable pedestrian scale for all of the streets and pedestrian connections interior to the site, which may be sorely needed with the heights that are being considered. 2.7

Additionally, greenspace will help with porosity of the site and abating heat island effect.

- Provide more developed street sections. Explain why dimensions of a traditional street cross section are employed in a curbless street proposal (for example in figure 3.8C). A curbless condition should encourage the creativity and flexibility of a shared street. If a standard street layout is desired then a standard street should be considered/implemented. The current street sections are both wide and lacking a sense of place. They are also employing a great number of bollards to define who goes where, which is not typically the point of a curbless cross-section. Provide a consistent layout of street trees and opportunities for planting/furnishing zones. Consider a shallow curb to provide functional definition to the street, while creating a channeling edge for stormwater runoff. BPDA Planning and Design Review staff feels strongly that standard street layouts may better serve the project for at least parts of the project. Look at how a standard street section might be blended with raised intersections, for example, to create a transportation network that is attractive and easy for all to understand and use. 2.8
- Provide sections at the proposed pedestrian shopping area between the turbine Hall and Blocks C and D. What is the dimension of this area? What is the proposed condition on either side? Is it possible to use this for service to the Turbine Hall and Blocks C and D? How does the character/use change when the use in the Turbine Hall Changes? How can this area accommodate trees or large plantings? 2.9
- Do street lights have to be atop poles? Look at different opportunities for building-mounted or catenary lights to reduce unnecessary elements in the streets and landscape. 2.10

Buildings & Massing

- Building heights, particularly for Buildings A and B, are still significantly taller than the neighboring buildings on the other side of East First Street. The existing fabric runs between 3-4 stories, while Buildings A, B and C are all 7 stories. The extreme narrowness of East First Street, particularly at Turbine Hall, compounds the concern around height on this edge. Provide sections drawn through at least Block A and B and the buildings on the other side of East First Street to show that relationship. Look at stepping back, reducing floor to floor height and other urban design tools to create a comfortable corridor along this block. 2.11
- A reduction in height on Building A would help reduce the scale of this building to the point that flipping the Courtyard from the East First side over to the Building F 2.12

side would significantly add to the sense of space and reduce the effects of shadows on this important interior open space. A version of an "H" shaped building with a larger courtyard facing Building F but still some recess facing East First would be positive for both sides of the building.

- Look at combined parking fields as a way to make below grade parking more efficient and to reduce the amount of above grade parking. 2.13

SUSTAINABLE & RESILIENT DEVELOPMENT

The L Street Station redevelopment will be constructing the next generation of buildings and doing so as Boston strives to ensure the long term sustainability and resiliency of the City. Projects of this scale also have the potential to capture the imagination and respond to the green and healthy building values of the new businesses and residents that will make this project their home. As the planning work progresses the project team should craft a visionary brand for the redevelopment that expresses the team's long term sustainability and resiliency values and goals.

Article 37 Green Buildings

PERMITS AND APPROVALS

Please revise Table 1-4 List of Anticipated Project Permits and Approvals to include "Boston Interagency Green Building Committee" and "Article 37 Green Building compliance". 3.1

GREEN BUILDINGS

The DPIR indicates the project will use the LEED v4 New Construction & Major Renovations (NC) rating system for the existing buildings and the new residential and hotel buildings which will be designed to achieve LEED Gold. And that the project will use the LEED v4 Core & Shell (CS) rating system for the new office use buildings which will and be designed to achieve LEED Silver. The IGBC accepts the rating system selections.

- The project team should target LEED Platinum for all buildings with a minimum commitment of at least one LEED Platinum building, no more than one LEED Silver and all remaining buildings LEED Gold **OR**, as an alternative minimum commitment, LEED Gold for all buildings. 3.2
- Please provide a LEED for Neighborhood Development (ND) Sustainability Narrative including a LEED ND Checklist.

Following are specific credits that the project team should give priority to achieving:

- Optimize Energy Performance–include additional strategies for achieving a 30% or greater reduction in energy use (+5 to 10 points).
- Demand Response–include strategies for reducing energy loads in response to utility (+3 points).
- Renewable Energy Production–include solar PV (+1 to 3 points).
- Regional Priority–the project appears eligible for additional points (+2 to 3 points).

In support of Boston's Carbon Neutral 2050 GHG goal, please include the following strategies for reducing GHG emissions:

- Prioritize passive strategies such as improved building envelope performance by increasing building envelope air tightness and insulation.
- Reduce active building systems and sizes to reflect improved passive performance and ensure systems cost savings are fully captured. 3.3
- Include solar PV and provide system(s) location, size, and output information along with any related analysis. At minimum the buildings should be solar ready.
- Assess the feasibility of CHP and analyze opportunities for on-site battery energy storage systems for reducing peak electrical loads and providing secure energy services for residents.

CARBON REDUCTION

Thank you for the Energy Model Analysis and Passive House memo; both provide useful insight into project planning and potential. The office and mixed use buildings are only meeting minimum energy / GHG reduction standards (2.1% to 3.6%) and, overall, the development is only 7.5% above minimum standards.

- For the Master Plan / PDA permitting review it might be more reasonable to focus on the three or four primary new building typologies: office, hotel, and residential or mid-rise and high-rise residential buildings. This will allow for more specific consideration of potential GHG reduction strategies and analysis. Building specific analysis can follow. 3.4
- The project team should identify additional measures to more significantly reduce GHG emissions with a top priority for passive building strategies that reduce demand and promote occupant comfort and health. 3.5
- GHG emissions analysis should consider both the additional costs for added insulation and air tightness strategies AND the cost savings attributable to reduced system sizing and alternative systems. 3.6

- Project and building analysis should include potential onsite solar PV and co-gen systems and related GHG reductions. 3.7

CLIMATE RESILIENCY

- The Climate Resiliency Report included in the DPIR is a WORKING DRAFT. An online version of the CR Checklist should be completed for each of the three or four building types with the resulting PDF submitted with the filing.
- The DPIR indicates all building first floor elevations will be at 21.5' (BCB) which is above the BPDA Climate Change Resiliency target elevation for the site. Given the long term sustainability goals of the City and the development, the project team should identify areas where higher ground floor elevations can reasonably be achieved. 3.8

SMART UTILITIES

- **District Energy Microgrid:**
  - The project team is working towards completing the District Energy Feasibility Assessment, which will be followed by the preparation of the District Energy Microgrid Master Plan. 4.1
  - The Feasibility Assessment and Master Plan will define the District Energy Microgrid commitment to be included in the Cooperation Agreement.

- **Telecommunications Utilidor:**
  - Provide a map/diagram highlighting the sections of the roads on the development area where a Telecom Utilidor will be installed, including access points to the Utilidor (i.e., manholes).
  - Provide the following information: 4.2
    1. Dimensions of Telecom Utilidor:
       a. Cross section dimensions (i.e., diameter or width X height)
       b. Length
    2. Capacity of Telecom Utilidor: (i.e., number of interducts, 2 inch (ID) pipes, etc.)

- **Green Infrastructure:**

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

4.3

- **Adaptive Signal Technology:**
    - Provide a map/diagram highlighting where on the development AST new signals and improvements to signals will be installed
    - Provide the following information:
        1. Describe how the AST system will benefit/impact the following modes:
            a. Pedestrians
            b. Bicycles
            c. Buses and other Public Transportation
            d. Other Motorized Vehicles
        2. Describe the components of the AST system (system design and components).

4.4

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

4.5

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

4.6

BOSTON

Martin J. Walsh, Mayor

October 30, 2018

Ms. Teresa Polhemus
Boston Redevelopment Authority
One City Hall Square
Boston, MA 02201

RE: DEIR/DPIR for the L Street Station at 776 Summer Street in South Boston

Dear Ms. Polhemus:

The Boston Parks and Recreation Department (BPRD) has reviewed the concurrent *Draft Environmental Impact Report* (DEIR) and the *Draft Project Impact Report* (DPIR) for the L Street Station (a.k.a. Edison Plant) located at 776 Summer Street in South Boston. This project is across the street from, and within 100' of Christopher Lee Playground / Medal of Honor Park.

BPRD previously reviewed the ENF/EPNF for the project in a letter dated August 4, 2017. Many of the issues in that letter remain open. Comments on the DEIR/DPIR are provided below.

This project will also be subject to design review by the Boston Parks and Recreation Commission under Municipal Code Section 7-4.11 prior to the issuance of building permits.

Impact Mitigation

Christopher Lee Playground and Medal of Honor Park will be amenities to this project. As presented below, the scale and proximity of the project will significantly impact this open space.

BPRD respectfully requests that mitigation commensurate to the scale of the development be provided in the form of a contribution to the City's Fund for Parks, to be used for the reconstruction of Christopher Lee Playground. BPRD estimates the improvements to be about $3,600,000 for the creation of clean and safe public open space through the renovation of the playing fields, energy efficient lighting, irrigation, fencing and retaining wall stabilization.[i] 5.1

Additionally, BPRD requests consideration of a maintenance endowment and a maintenance agreement to provide ongoing turf management and other services at these public parks.

Project Description

This 15 acre site will be developed with 1.9 million sf of residential, office, hotel, retail, restaurant and parking uses. The project consists of eight large blocks of buildings which will range from 82 to 210 feet in height. The two blocks sited closet to Christopher Lee Playground will be seven stories (82 feet high). There are 1344 residential units currently proposed. The submittal does not include the number of expected residents, employees, shoppers, or visitors.

Onsite Open Space

The DEIR/DPIR states that there will be 5.5 acres of publicly accessible outdoor open space on the site, including 2.5 acres of open space on the waterfront. The previous ENF/EPNF plan included 2.4 acres of open space with 1.15 acres of open space on the waterfront. It is not clear from the plans how the open space is being measured or how it has changed so significantly.

The Conceptual Landscape Plan in the DEIR/DPIR shows the Chapter 91 waterfront area with storm water management features, HarborWalk and plaza space. The onsite open space appears to be mainly passive use green nodes; hardscaped event plazas, retail plazas and terraces, and pedestrian alleys between buildings. A play area is shown between blocks A and F. The remainder of the onsite open space is provided as rooftop decks. With the exception of the play area, there is no active recreational open space to serve the residents of the project.

Further detail is needed to understand the open space proposed in the DEIR/DPIR as the submittal has changed since the ENF/EPNF but only a conceptual plan and narrative is provided. The proponent should clarify how it is counting the acreage and list the type and use. 5.2

The public realm of streets, sidewalks, retail plazas and parking areas is distinct from public parks, though it can be complimentary. This type of space should be counted separately.

Regulations for Open Space

This project is subject to State and local regulations and requirements for open space including those below. The proponent should detail how the project will meet or mitigate the following:

- Open space required under Chapter 91;
- Open space approved by the EOEEA Secretary as Public Benefits Determinations;
- Open space required by the underlying Article 42A Harborpark District zoning which requires that a project devote at least 50% of the lot area to open space;
- Open space mitigated for the Article 80 Planned Development Area in lieu of zoning; 5.3
- Open space for public access required for the City's HarborWalk system;
- Open space intended to protect the project from coastal impacts of climate change;
- Open space which serves the needs of the users of the development;
- Open space which serves the needs of the neighborhood as identified in the *Imagine Boston 2030* and the *Open Space and Recreation Plan*; and
- Mitigation for impacts to existing public open space in the neighborhood.

Open Space Phasing

The proponent should explain the proposed phasing of the open space. The Article 80 and MEPA approvals should consider a requirement that the waterfront open space be implemented in the first phase of development. This will ensure that the public benefit to the neighborhood of South Boston is fully realized in the near term and is not subject to ongoing amendment. 5.4

Protection in Perpetuity

Open space required under regulation such as zoning or provided as mitigation of a PDA, or required under Chapter 91 or approved as a public benefit by the EOEEA should be permanently protected to ensure that it remains a public benefit in perpetuity. It may be managed privately. 5.5

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

Needs Analysis

The DEIR/DPIR does not detail the number of residents, employees, shoppers, or visitors expected to use the site at buildout. A needs analysis should be completed based on projected users of open space. This analysis should estimate of the demand for active recreational needs, the ability to accommodate those needs onsite, and/or the reliance on existing public open space. 5.6

Impact Assessment

South Boston is currently underserved by public parks, playgrounds and athletic fields suitable for active recreation. Significant new development is putting pressure on existing public open space. This project will add 1.9 million sf of development with 1344 households, and will require new parks to meet the active recreational needs of the population that is created through the PDA. An impact assessment should be conducted to determine impacts to public open space. 5.7

The proponent should address how it is meeting the public open space needs outlined in *Imagine Boston 2030*, which includes the *Open Space and Recreation Plan 2015-2021*. The proponent should explain how it is helping the neighborhood to achieve the city average of 3.24 acres of active recreational open space per 1000 residents, at a minimum. 5.8

Shadow Impacts

The project will be 82 to 210 feet tall and will be approximately 50 feet from Christopher Lee Playground. The proponent should provide detailed shadow studies showing impacts to public open space year round, from dawn until dusk. This information may have been provided already, but was not readily evident in the DEIR/DPIR filing online. Any impacts should be mitigated. 5.9

Environmental Impacts

The proponent should summarize and mitigate any potential project impacts (noise, air quality, traffic congestion, etc.) on Christopher Lee Playground / Medal of Honor Park. 5.10

Construction Impacts

The proponent should detail any potential construction impacts (noise, air quality, traffic impacts, street closures, etc.) on Christopher Lee Playground / Medal of Honor Park. 5.11

Dog Recreation Space

The project should include a dog recreation space onsite. This project is adjacent to a dog park, but the high density of development would burden one of the few dog parks available in the city. The project should therefore plan to accommodate the needs of its own canine residents onsite. 5.12

Conclusion

The scale and proximity of the project will have a significant impact on Christopher Lee Playground and Medal of Honor Park. BPRD respectfully requests that mitigation commensurate to the scale and impact of the development be provided in the form of a significant contribution to the City's Fund for Parks, to be used for recapitalization and maintenance of this public space.

BPRD further requests that the proponent enter into a maintenance agreement to provide turf management and other services at Christopher Lee Playground / Medal of Honor Park.

Finally, onsite open space that is provided as mitigation for Article 80 or MEPA approval should be publicly owned and protected in perpetuity to ensure access for generations to come.

Thank you for your consideration.

Sincerely,

Carrie Marsh

Carrie Marsh, Executive Secretary
Boston Parks and Recreation Commission

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

[1] BPRD Capital Budget Estimate, Christopher Lee Playground, 775 East First Street, South Boston, FY18 Update

Boston Parks and Recreation Department

CAPITAL BUDGET ESTIMATE

Christopher Lee Ballfield Improvements — FY'18 Update

Christopher Lee Playground - 775 East First Street, South Boston

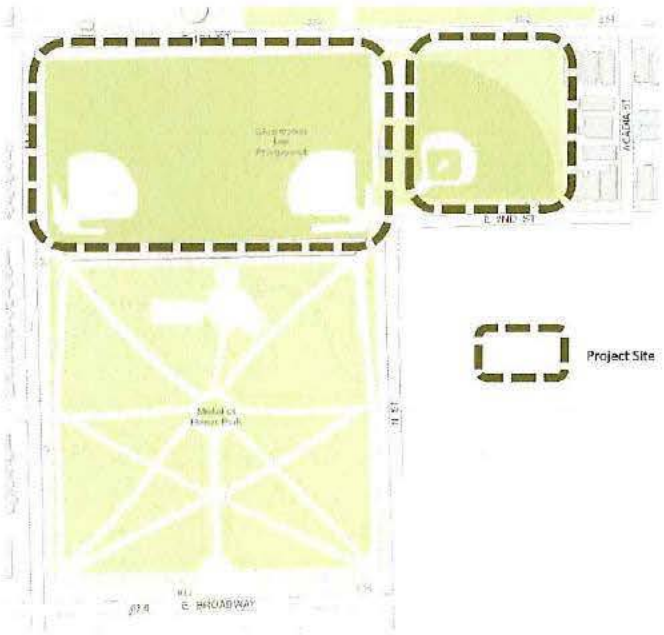
Park Acreage: 5.5 acres

Project Mission

Renovate ballfields for Little League play including energy efficient lighting, irrigation, fencing and retaining wall stabilization.

Budget Justification

Create clean and safe open space for Little League play in South Boston that will include energy efficient lighting and water systems. The existing athletic field light poles are in significant decline and fixtures are not energy efficient. The natural turf field suffers due no irrigation and the forty+ year old fencing is in decline. The perimeter retaining walls are in need of stabilization. The project could look into the feasibility of opening the fieldhouse to the leagues if an agreement could be made regarding cleaning of the building.



Project Estimate — $ 3,600,000

Construction		
Site Preparation	$	208,500
Utilities	$	1,296,000.00
Hardscape & Landscaping	$	468,600
Amenities	$	-
SUBTOTAL	$	2,477,608
Primary Work Tasks (00 70 00) (12%)	$	297,313
Overhead & Profit (5%)	$	123,880
Escalation (4%)	$	99,104
Design Contingency (5%)	$	123,880
Construction Contingency (5%)	$	123,880
TOTAL	$	3,245,666
SAY	$	3,250,000

Design		
Base Fee	$	325,000
Supplemental Fee	$	20,000
SUBTOTAL	$	345,000
Design Contingency (0%)	$	-
TOTAL	$	345,000
SAY	$	350,000

Total Estimated Working Budget	$	3,595,000
CAPITAL BUDGET ASK	$	3,600,000

CITY of BOSTON
Martin J. Walsh, Mayor

To: Tim Czerwienski, BPDA

From: Joseph Fleury, PWD

Date: October 30, 2018

Subject: 776 Summer Street DPIR - Boston Public Works Department Comments

Included here are Boston Public Works Department comments for 776 Summer Street DPIR.

Site Plan:
Developer must provide an engineer's site plan at an appropriate engineering scale that shows curb functionality on both sides of all streets that abut the property. 6.1

Construction Within The Public Way:
All work within the public way shall conform to Boston Public Works Department (PWD) standards. Any non-standard materials (i.e. pavers, landscaping, bike racks, etc.) proposed within the public way will require approval through the Public Improvement Commission (PIC) process and a fully executed License, Maintenance and Indemnification (LM&I) Agreement with the PIC. 6.2

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

6.3

The developer should include the sidewalk abutting the Medal of Honor Park/Christopher Lee Playground in the proposed reconstruction of East 1st Street, to provide an assesible pedestrian path of travel on the south side of East 1st Street.

The developer shall work with the City to explore expanding the redesign of Summer Street/L Street from the current proposed limits (Freight Corridor to East 1st Street) to East Broadway, to provide a cohesive design of the corridor. This design should complement the City's current design efforts in the Seaport.

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

Driveway Curb Cuts:
Any proposed driveway curb cuts will need to be reviewed and approved by the PIC. 6.4

Discontinuances:
Any and all discontinuances (sub-surface, surface or above surface) within the Public ROW must be processed through the PIC. 6.5

Easements:
Any and all easements associated with this project must be processed through the PIC. 6.6

PUBLIC WORKS DEPARTMENT
Boston City Hall • 1 City Hall Sq Rm 714 • Boston MA 02201-2024
CHRIS OSGOOD • Chief of Streets, Transportation, and Sanitation
Phone (617) 635-2854 • Fax (617) 635-7499

Landscaping:
Developer must seek approval from the Chief Landscape Architect with the Parks and Recreation Department for all landscape elements within the Public ROW. Program must accompany a LM&I with the PIC. 6.7

Street Lighting:
Developer must seek approval from the PWD Street Lighting Division, where needed, for all proposed street lighting to be installed by the developer, and must be consistent with the area lighting to provide a consistent urban design. The developer should coordinate with the PWD Street Lighting Division for an assessment of any street lighting upgrades that can be considered in conjunction with this project. All existing metal street light pull box covers within the limits of sidewalk construction to remain shall be replaced with new composite covers per PWD Street Lighting standards. Metal covers should remain for pull box covers in the roadway. 6.8

Roadway:
Based on the extent of construction activity, including utility connections and taps, the developer will be responsible for the full restoration of the roadway sections that immediately abut the property and, in some cases, to extend the limits of roadway restoration to the nearest intersection. A plan showing the extents and methods for roadway restoration shall be submitted to the PWD Engineering Division for review and approval. 6.9

Project Coordination:
All projects must be entered into the City of Boston Utility Coordination Software (COBUCS) to review for any conflicts with other proposed projects within the public right-of-way. The Developer must coordinate with any existing projects within the same limits and receive clearance from PWD before commencing work. 6.10

Green Infrastructure:
The Developer shall work with PWD and the Boston Water and Sewer Commission (BWSC) to determine appropriate methods of green infrastructure and/or stormwater management systems within the public right-of-way. The ongoing maintenance of such systems shall require an LM&I Agreement with the PIC. 6.11

New Roadways:
All new roadway shall confirm to the Public Works Department's Roadway Design Standards. 6.12

Please note that these are the general standard and somewhat specific PWD requirements applicable to every project, more detailed comments may follow and will be addressed during the PIC review process.

If you have any questions, please feel free to contact me at joseph.fleury@boston.gov or at 617-635-2220.

Sincerely,

Joseph Fleury
Senior Civil Engineer
Boston Public Works Department
Engineering Division

CC: Para Jayasinghe, PWD
Zach Wassmouth, PWD

STEPHEN F. LYNCH
8TH DISTRICT, MASSACHUSETTS

COMMITTEE ON FINANCIAL SERVICES
SUBCOMMITTEE ON CAPITAL MARKETS, SECURITIES, AND INVESTMENTS
SUBCOMMITTEE ON TERRORISM AND ILLICIT FINANCE

COMMITTEE ON OVERSIGHT AND GOVERNMENT REFORM
RANKING MEMBER, SUBCOMMITTEE ON NATIONAL SECURITY
SUBCOMMITTEE ON INFORMATION TECHNOLOGY

ASSISTANT DEMOCRATIC WHIP

Congress of the United States
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Washington, DC 20515-2108

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508-580-4692 FAX

1245 HANCOCK STREET
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617-657-6305
617-773-0995 FAX

LYNCH.HOUSE.GOV

October 30, 2018

Mr. Tim Czerwienski
Boston Planning & Development Agency
One City Hall Square, 9th Floor
Boston, Ma 02201

RE: 776 Summer Street, South Boston

Dear Mr. Czerwienski:

I am writing regarding the proposed development at 776 Summer Street in South Boston, formerly the Boston Edison Plant. As the U.S. Congressman for the 8th District in Massachusetts, I am privileged to represent the families and businesses of South Boston. I have also been involved for the past 20 years in the efforts to clean up and revitalize the area around this proposed project.

The proponents, Hilco Redevelopment Partners LLC and Redgate Capital Partners LLC, also known as HRP 776 Summer Street LLC, are proposing to redevelop an approximately 15.2-acre site located at the corner of Summer Street and East First Street in the South Boston neighborhood. Their proposal, according to their *Draft Environmental Impact Report/Draft Project Impact Report,* includes approximately 1.93 million sq. ft. of occupiable space, 1,334 residential units, 368,070 sq. ft. of office uses, 85,630 sq. ft. of retail uses, two hotels totaling 344 hotel rooms, and up to 1,397 parking spaces along with 2.5 acres of open space on the waterfront.

The proponents, Hilco/Redgate have made some limited progress during the recent series of community meetings; however, there are major issues which remain to be addressed if this project is to be allowed to move forward. A singular point of agreement seems to be the unanimous view of all parties desire to have the 15.2 acre site cleaned of toxic waste and environmental hazards. The proponents have verbally agreed to pay for an independent Licensed Site Professional (LSP) to oversee the cleanup phase of the project on behalf of the local community. This concession was welcomed by local residents. The through-street grid design which extends M Street and the South Boston neighborhood to the water's edge and additional park area are improvements.

Meanwhile, the central opposing concern expressed by many residents is the dense massing of buildings on the site and the traffic that will likely result. The proponents have informally ordered some reduction in the number of residential units and offered to increase the percentage of "workforce affordable housing" but more discussion and compromise is needed. In addition, there was some confusion regarding the wide range of estimated vehicle trips that were expected as a result of the project. More accurate data and greater certainty in traffic analysis would be very helpful. 7.1 7.2

Over the past 15 years significant efforts by City, State and MASSPORT have mitigated environmental hazards and re-engineered neighboring parcels to this site. Significant resources have been dedicated to remove heavy trucks and commercial traffic from East First Street and to transform the area into a pedestrian-friendly street. There is a palpable fear that the addition of 1300 apartments, two hotels and 450,000 sf of office and retail space might overwhelm the area and negate all the progress made so far. It is fair to say that scaling back the mass of the project would be helpful. It is reasonable to expect that with 15.2 acres to work with, the proponents can thoughtfully scale back their proposal and yet still have a very successful and profitable result. 7.3 7.4

A severe lack of available parking is the bane of our existence in South Boston. The proponents need to find a way to provide some off-street parking to their neighbors in perpetuity. Discussions with the MBTA and MASSPORT may offer a way to collaborate. Based on the size of this project and current demand, it would require about 120 South Boston Resident-Sticker-only parking spots to relieve the current situation for their long-suffering neighbors. A modest fee for such parking could be acceptable. 7.5

These outstanding concerns must be adequately addressed to the satisfaction of my neighbors and our elected officials before I can consider offering my full support for this proposal.

In closing, I would like to thank you for the opportunity to comment on this proposed project. If you have any questions regarding this matter, please do not hesitate to contact me.

Sincerely,

STEPHEN F. LYNCH
Congressman
8th District
Massachusetts

SFL/nz

The Commonwealth of Massachusetts
MASSACHUSETTS SENATE

SENATOR NICK COLLINS
First Suffolk District

STATE HOUSE, ROOM 410
BOSTON, MA 02133-1053
TEL. (617) 722-1150
FAX (617) 722-2191
WWW.MASENATE.GOV

October 29, 2018

Tim Czerwienski, *Project Manager*
Boston Planning and Development Agency
1 City Hall Square, 9th Floor, Room 900
Boston, MA 02201

Re: Public Comment for 776 Summer Street

Project Manager Czerwienski:

We are writing to respectfully request that the Boston Planning and Development Agency extend the public comment period for the proposal at 776 Summer Street, which has a current deadline of October 30, 2018. At last week's public meeting, several residents similarly asked for an extension of the public comment period. In light of the size, scope, and complexity of the proposal, we believe an extension is warranted and would allow residents to provide thoughtful comments on the proposal. We would also like the proponents to publically present Alternatives A and B to their primary proposal so that the community can carefully consider all options. 8.1 8.2

For these reasons we respectfully request that the comment deadline be extended until November 30th, 2018. Thank you for your time and attention to this important matter, and please do not hesitate to reach out to our offices should you have any questions.

Sincerely,

NICK COLLINS
State Senator

ED FLYNN
City Councilor

MICHAEL FLAHERTY
City Councilor

DAVID BIELE
State Representative-Elect

cc: Mike Christopher, *Deputy Director for Development Review / Government Affairs*

Jim Coveno

721 East Sixth Street

Unit # 2

Boston, ma. 02127

This letter contains my comments regarding the proposed 776 Summer street project. As a member of the IAG, I take this responsibility very seriously and offer comments from me personally and comments I have received by simply listening to my neighbors in the City Point neighborhood.

First off the largest and longest lasting impact to the neighborhood and "Southie" in general will be traffic and its associated pollution. This is by far the greatest concern of all residents, as evidenced by the quantity of and the persistent nature of the comments voiced at the numerous public meetings. In Redgate's own admission the management of site access by vehicles and pedestrians will determine the ultimate success of the project. Many residents including myself believe that traffic management is a requirement for the project. The Redgate team is proposing multiple signal improvements from the intersection of Summer and D street to Columbia Road. It is essential that these improvements are required and not viewed by the city and state officials as a "benefit" or mitigation measure. In the Redgate's own presentations they repeatedly state that movement of people in and out of the project when completed is essential for its success, therefore these improvements must be a requirement of the project. These signal improvements are coupled with various physical changes required at almost all the intersections along the summer street corridor. Again these are a required element and not a benefit. The timing of these improvements in relation to the overall proposed project schedule should be the prerequisite to any portion of the facility being open for use. I am personally frustrated by the elected officials' complete opposition to the project, on the grounds of traffic and pollution resulting from the project's completion. It is these same elected officials who have over the past 5 years not only allowed the expansion of the Seaport and Summer street corridor to grow beyond, what the streets can handle. All of the current traffic woe's being experienced by the residents of South Boston is solely due to the complete lack of planning by these officials. Coupled with their obviously short sited support of countless projects, that include no traffic management measures. It is their (the elected officials) failings in the past that have resulted in the traffic problems. They now are placing all the burden of correcting their own past mistakes on the Redgate team. It is my impression that Redgate by and large has stepped up and is addressing the city's prior failures. Besides the obvious impact to quiet enjoyment of our homes the traffic will bring, the traffic brings additional pollutants into the air. Recent air quality monitoring performed by MASSPORT has revealed that due in part to the MASSPORT efforts the air quality has actually improved in the first street corridor. The Redgate project will certainly role back some of these improvements. It is unclear if the added trees and plantings contained in the project will mitigate some the pollution impacts. I encourage Redgate to increase the quantity of trees. Trees are beneficial to the air quality and add a proven noise control element. 9.1

Redgate's vehicular projections are in line with all accepted industry traffic management parameters, and have been accepted for the most part by city officials. That being said it is a strong feeling among the residents that the numbers generated by the traffic management industry's standard methodology, do not result in an accurate prediction of volume. The actual vehicle trip count will be much higher than the project data has put forth, this is a widely held belief of residents. The trip counts can somewhat be mitigated by the creation of an additional access point to the site. Currently there are two public access points and one commercial point. The addition of one more will serve two purposes. First it will disperse the vehicles across a wider area, secondly it will give the access roads an additional stacking lane, thus allowing the area's through traffic to move because it will not be burdened by a potentially excessively long line vehicles trying to gain entry at the singular access point on Summer Street. 9.2

Redgate's proposal to provide a shuttle bus to South Station from the site is in my opinion a good service for the new residents of the Edison Village, but will not be utilized by the residents of South Boston to any great extent. The MBTA has recently expanded its level of service from the 1st street terminal and their (MBTA) data does not show any

significant increase in ridership from that location. Indicating me that most residents are not willing to walk the distance to that terminal, so it is also unlikely that the residents will be willing to walk to the Redgate shuttle locations. The shuttle will most likely see its majority ridership from the residents and employees of the businesses proposed at the Edison site. It (the Edison shuttle) will elevate the added burden the residents and employees from the Edison site would place on the MBTA bus routes currently operating, so in that respect could be considered a mitigation.

Edison projects impact on the Conley terminal operations cannot be understated. This port facility currently enjoys an unprecedented level of efficiency. Due in large part to the freight truck access. The impact of added vehicles to the summer street corridor will decrease the efficiency of the operation by reducing the truck trip times in and out of the terminal. Redgate has not adequately addressed this impact. Redgate's proposed signal improvements will help but at this time they (Redgate) has not presented enough data to account for the projected increase in terminal truck trips. Redgate should more fully explore this impact and have in place a plan to augment the traffic patterns should the traffic to and from their site become problematic to the terminals operations. 9.3

The Redgate proposal as is, simply does not address parking to the extent the residents are comfortable with. Every effort must be made to, at a minimum double the current scheduled parking spaces. It is felt by many residents that a partnership with MBTA and Massport might be the solution. 1. To share burden of costs and also minimize the real-estate require to house a parking garage. With this public private partnership all three interested parties would ultimately benefit and the residents of South Boston will get what has been a steady mantra for more than a decade, that being a parking facility in the neighborhood. 9.4

Another little discussed impact on the residents of South Boston is that the Edison project will further worsen the burden on recreation facilities currently happening. With the expansion of the Seaport there are many sports leagues associated with the businesses. These leagues are over burdening the baseball fields. Resulting in youth and little field conferences in south Boston being forced to travel to other areas of the city to play games. Now this may seem trivial but it is a quality of life issue for families in south Boston. Where in the past parents could send their children out the door to walk to a field to play a game. Now because of the multiple seaport based company leagues they must get in the car and drive to other areas. Upon return the parking spot they had is no longer available. To me if Redgate increases parking facilities and provides (either off site or on site) recreational field's it would be viewed by residents as a direct benefit to them. 9.5

It is my impression that the Redgate's proposal has addressed the environmental clean-up required on the site adequately with the singular exception of the potential presence of coal dust at the site. Redgate should perform tests to determine if this insidious contaminate exists on the site. 9.6 The MEPA plan does not specifically address this contaminate. The commitment of Redgate to provide funding for an additional LSP on the project is encouraging. This LSP would be evaluating the data with the specific intent of resident protection. That is not to say that the projects LSP would perform inadequately, this LSP is motivated by in compliance with the regulations not resident safety. The addition LSP will not be looking for minimum compliance, this LSP will be the watch dog for the neighborhood and potential areas where the regulations could be surpassed resulting in better conditions for the residents of South Boston. This resident representative LSP should be routinely posting to a website the goings on and progress of the project. These updates should contain simple language descriptions of contaminates being treated, their potential health hazard, and just how the process being employed at the site is eliminating the risks to the extent possible the health risks to the residents. 9.7

I am encouraged by Redgate's supplemental plan to increase the amount of historical preservation of buildings. Additionally applaud the basic designed use of these elements.

In my opinion *which is not shared by a good amount of neighbors,* the massing and density as currently presented project is acceptable. My fellow residents view the current proposal as to dense, and are adamant the residential unit count be reduced. I feel that if Redgate augments the parking this density could be supported.

Diversity in the housing stock on the site should be more fully explored. With the recent announcement of the Marion Manor property will be sold, the need for additional senior housing in South Boston is becoming acute, and nearing critical. Redgate could add senior housing to the site which would be perceived as benefit to the community allowing elderly residents to stay in South Boston. The problem with this is that in order to be a true South Boston Benefit the application process must include preferential acceptance for the residents of South Boston. This "top of the list" acceptance may be considered discriminatory. The Redgate group should explore the legal maneuvers necessary to get this type of arrangement in place. Affordability of the housing units should be made a greater priority by the proponent across the entire project. By their own admission the current level is only the minimum. Redgate also claims to want to do better than the minimum on this project on all fronts. Thus far when it comes to affordable housing, they Redgate is not coming close to meeting their own stated goals let alone come near to the communities expectations for affordability. This should be a top priority of Redgate and the city officials. Let's get creative and have specific meetings regarding affordable housing. There are many residents willing to participate in this endeavor if the result could be staying in South Boston with their families.

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The potential community amenities of the project is a welcome change from all the seaport district development. Unlike those projects the Redgate proposal is offering markets, dinning and exterior open spaces that are family friendly. These amenities have long been sought by the residents and will certainly be enjoyed by many. But the question about being truly public keeps cropping up. This site is private and solely held by the Redgate. Bringing up questions regarding access restrictions, which could be imposed after permits have been issued and full build-out is complete. A covenant should be instituted with the zoning relief being sought to mandate access remain public to all. The revenues gained from parking meters and ticketing will become the sole asset and revenue stream of Redgate. These revenues should be shared with the community in some manner. Perhaps 1% could be placed into a fund for the South Boston residents to utilize for improvements and beautification across South Boston. Planting trees, park maintenance and landscaping of intersections would in my opinion be some of the uses of these funds.

9.10

9.11

The discussion about what could be a mitigation for the community has yet to happen. I feel that the site as currently planned could not sustain many more additions as it is utilized fairly efficiently. The addition of a parking facility should be made part of the plan, but this will eat-up nearly all the surplus real-estate on the site, therefore the mitigations in my opinion should by and large be off site. Items like the improvement of the sidewalks on both sides of 1st street is one such benefit I would support. Completion of the M street park fencing is another. Establishment of a community room for civic organization use and the arts is yet another. Setting aside a structure for the greater community use will assist in this developments goal of integration into the neighborhood. With the free migration of existing residents into the site and interacting with the new Edison residents will foster and maintain the integration process.

9.12

9.13

Overall I am in support of the project, but feel the current proposal falls short in the areas described above. The Redgate proposal should not be granted approval until these issues are fully answered, and the framework set-out for true legally enforceable commitments from Redgate.

Jim Coveno

IAG member for 776 Summer street project

Chairman of the South Boston City Point Neighborhood Association

Tim Czerwienski <tim.czerwienski@boston.gov>

comment letter for 776 Summer St. (IAG MEMBER)

White, Anna · Wed, Nov 7, 2018 at 2:11 PM
To: Tim Czerwienski <tim.czerwienski@boston.gov>

I am an IAG member for 776 Summer Street and I have comments for the BPDA as this phase of the development process ends.

1. I am afraid that we are rushing through things. I don't think we should move phases until we, as an IAG, fully discuss Inclusionary Development at this site. We have not spoken about it as an IAG and we need to have an in-depth discussion. South Boston needs more deeply affordable units so people of all means can continue to call this neighborhood home. 10.1
2. I do not believe this project has enough usable active recreation space. All of South Boston's active recreation sites are overcapacity already. How will the developers address this? I believe this should be a major focus of mitigation and it is an issue we haven't really discussed as an IAG. 10.2
3. Our transit system is also at capacity. Adding 1000+ units, plus offices, hotels, and shopping, will tax it even more. As a part of their mitigation, I would like the developers to fund a transit study that would find the true cost of expanding the Red Line to City Point and the cost of extending the Silver Line to City Point. I think that is an option that should be explored before 1000+ units are built. 10.3

Thank you very much,
Anna White

776 East Broadway
South Boston, MA 02127
October 30, 2018

Tim Czerwienski, Project Manager
Boston Planning and Development Agency
One City Hall Square
Boston, MA 02201
tim.czerwienski@boston.gov

Re: South Boston Edison Draft Project Impact Report Comments

Dear Tim,

I write to you today as a participating member of the IAG and a concerned resident. After attending the open meetings with Redgate Capital Partners and Hilco Redevelopment and discussing the topics as follows, Introduction to Project Changes on September 12, 2018, Transportation on September 26, 2018, Land Use and Design on October 10, 2018 and Climate Change and Resiliency on October 24, 2018, I see no substantial changes in the scope of the development nor do I see any significant changes to lessen the impacts to the South Boston neighborhood. I remain concerned with the size of the project and I remain in opposition as well. I certainly do not see any public benefits.

Mitigation is not working and the issues of traffic, public safety, utility studies, wastewater capacity studies, density, height, parking, privatization of transit, public property becoming private, possible traffic interruptions and loss of efficiency at Connolly terminal as well as the lack of independent state and city traffic studies, remain outstanding. Environmental concerns remain and environmental studies are needed as South Boston has had the highest rates of lupus and scleroderma in the state. South Boston also has high cancer and respiratory illnesses. In addition, the project jeopardizes the health of our community with creating more traffic. My suggestions for future planning must include continued air and noise monitoring. 11.1

Advanced notification of all demolition processes and permitting should be noticed to residents in local newspapers. 11.2

Additionally, a publication notice of team member information must be available to all residents for future contact. 11.3

Proposed demolition should not be from 7am to 7pm including Saturdays. 11.4

This proposed schedule is in total disregard for the entire community and requires additional city review. Other questions remain; who will be policing this 11.5

development and will the development have their own police department.

I was told in 2014, the Neighborhood First organization, projected the expansion of Connolly Terminal trip projections would be approximately 4,820 trucks everyday by 2022. Adding potentially over 15,000 vehicles a day (including more buses) in a community already experiencing traffic and gridlock, creates serious health concerns as well as deteriorating air quality. The 5 1/2 acres of open space in the development plan is inaccurate. There is deception when discussing the amount of open space within reports and presentations. The 2.5 waterfront acreage in time will be affected by climate change. Pursuant to the climate change/ resiliency review meeting, by 2050, the North waters will not exist from the acceleration of sea level rise resulting in unusable open space. The inclusion of open space shown in the report has enlarged sidewalks and walkways, car entrances to the development, pedestrian corridors, a play space, an ice skating rink thus creating an illusion of open space. There needs to be more open green space with trees similar to Castle Island where one can enjoy looking at the ocean's calming waters and landscape. The overall design proposal for open space has more of a carnival/circus lawn on D feel to it. It does not enhance the public realm. Open space will decrease with activities. Utilization of M Street Park will increase with the overdevelopment thus eliminating both green and open space. Also, Logan airport flights, cruise ship and freight activity, new hotels and the Seaport development all focused in our neighborhood are affecting open space and air quality. There is a strong need for a Master plan. The pressure on our open air infrastructure is questionable. There is a lack of transparency and the truth about open space is needed.

11.6

Transportation issues remain behemoth and require organization and real planning. A joint course of involvement including the T, Massport, State and City is necessary. There must be a combined effort to electrify future transportation. The proposals or amenities being introduced by Tom Tinlan, VHB are troubling and complicating our already heavily burdened transit. More buses are not the answer. VHB's proposal is to privatize MBTA services. I do not support their request to begin a community shuttle service prior to approval. When asked for details regarding the transportation bus company name, size of said vehicles and where they would be parked, I was told they are the size of standard buses. Consideration should be given to trolleys being placed on 4th Street to L Street along Summer Street to South Station and rotating back and forth.

11.7

Additionally, I believe returning outgoing buses to 4th street will generate a better traffic flow. Currently, 4th Street is one way from Farragut to P Street. Making it one way all the way to L Street would allow an easier flow of buses not being stopped at the L and East Broadway traffic light. I would like to see a street analysis for not returning buses to E 4th Street. I support some buses running on 1st Street with express service to South Station and others continuing along 1st Street, taking a right onto D Street and continuing to South Station and the Seaport area to service all areas of South Boston. There is a strong need for a number 7 bus on Sundays. However, that service is not being offered by VHB. Sunday number 7 bus service would certainly be a community benefit. Transportation services are needed throughout the entire community. ADA and senior accommodations are being ignored by VHB. Their interest is to service only their development. The Redgate/Hilco promises of today are not guaranteed. Private companies can change their promises, sell said property or worst case scenario, and file for bankruptcy.

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The T needs to work more efficiently and this could easily be done simply by adjusting bus schedules. Starters should not send three number 7 buses together at the same time resulting in traffic back-ups, idling and pollution. Buses need to be staggered and better monitored. Double deck buses are an option. Adding more buses both T and privately owned is not a viable solution. The Boston Herald's recent article dated October 2, 2018 "Choking on Growth" dated October 2, 2018, stated in part discussed "environmental experts and activists are sounding the alarm on Boston's air quality, with high asthma rates as an economic boom fuels, the region's worsening traffic congestion." The article also refers to "electrifying our transportation." The City is asking the T for the red line, blue line connection. Transportation suggestions are being ignored and are not the full responsibility of the Edison proposed project.

As previously discussed, this property will remain private property, not inclusive and without connection to the South Boston neighborhood. The proposal includes widening sidewalks and building legal walls, which will eventually become private. The City needs to intervene and own newly created public streets. The current project design for vehicle access is unacceptable. There needs to be additional street entrances other than M Street and Elkins Street for vehicular traffic. Additional street entrances on 1st Street are needed. As suggested, another new entrance on 1st Street could follow behind building blocks A, F and H with a left turn at the end

11.12

which would take one through the development and exit onto Powerhouse Street. The Summer Street entrance reflects a four sided stop. Elkins street serves no purpose in decreasing traffic since it is a private way.

Article 68 was established for 1st Street residential use. The Edison project was never a consideration. Now it is another 15 acre monster to South Boston and the City Point neighborhood. The initial development proposal called for 1588 units of housing with 987 parking spaces and heights at 220 feet, two hotels with office space. The newest proposal includes 1344 units with 1397 parking spaces and height of 206 feet. These changes reflect 244 less units and 14 feet removed from the height and 53 added parking spaces. **It is just too big** and out of character for the City Point neighborhood.

Instead of hotels, it would be nice see a nursing home and/or assisted living facility, a smaller office building and a much larger parking lot with discounted parking for South Boston residents. The parking needs to have Massport's involvement. 11.13
The proposal includes 13% for affordable housing. This is an insignificant amount of affordable housing and must increase. A dedicated museum in the Belco building reflecting the Edison history would be a welcome addition. Also, a historical trade school on site offering real job opportunities could benefit our neighborhood. There is so much need for more discussion. 11.14 11.15 11.16

The entire development currently has no connection to City Point. Once again, the Edison project redevelopment should be beneficial for all South Boston residents especially with regards to the City Point neighborhood.

Very truly yours,
Eileen Smith

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J.F. Bennett
South Boston, Mass.
October 30, 2018

To whom it may concern:

I have been and must remain opposed to the Edison development as presented. It is too large-it will overwhelm the neighborhood not blend with it and I have serious questions regarding what has been presented and what would be built. As a member of the IAG I have spent the past summer reading what I could of current urban renewal schemes, Privately Owned Public Spaces, Common Interest Developments, intelligent street design, gentrification and anything else I thought might help me understand this proposal.

Everything I have read gives me pause. A development of this size and scope will radically alter the surrounding community displacing many long time residents and decimating City Point's institutional memory. Such a radical change will have a serious negative psychological effect on our community. We are already in the throes of an ongoing drug and depression crisis. The displacement caused by this sort of major change can only make matter worse. This sort of project is akin to the renewal schemes of the fifties and sixties, those projects failed miserably-shouldn't we learn from past mistakes.

Below in no particular order are some of my concerns and comments in no particular order. I have other concerns that I feel others many more clearly annunciate, so I leave those to them.

CIDs/POPS

If this is not a Common Interest Development what is it? It is fifteen acres of land privately owned and developed on which stakeholders will contribute to its maintenance and upkeep. As this development ages and maintenance costs increase it will become less attractive to investors and those who do buy in will be less willing to ante up the increased costs of major repairs and upgrades. When this happens who will end up paying for necessary upkeep? If an area as large as this, in the midst of our neighborhood, goes into decline what effects will that have on the surrounding area? What guarantee do we have to protect our long-term investment in our community? 12.1

Where do the laws of the Commonwealth and the ordinances of the city stand regarding liability and civil rights on this sort of POPS (Privately Owned Public Space) How much does the average citizen understand about these hybrid spaces? If for example a union or other group feels the need to picket or protest a business on the Edison Development land on one of the private ways, can Redgate or it's designated "common area entity" force the removal of these picketers from the entire development? What of liability responsibility? How is police authority modified? Zuccotti Park in New York City comes to mind. 12.2

What mechanisms doe the city and state have in place to guarantee all public realm agreements are completely fulfilled? The city has a poor record up to now 12.3

supervising POPS (as does NYC, the birthplace of POPS.). Last year's issues with the Intercontinental Hotel and ICA Harborwalk areas is indicative of a lack of oversight. This record causes me to further doubt the reality of some of the promised benefits of this development.

I am less than enthusiastic about handing off oversight of our commonweal to private management-I believe this to be an abrogation of the responsibilities vested in government hands by the public.

Professor Jerold Kayden speaks of profit motive bleed into what is claimed to be public space; as I read the materials provided I see private enterprise continually conflated with what is sold as public amenities. Outdoor seating is not a public amenity if it's adjacent to a café-it's extra seating for a profit making enterprise. Not having a street across the north face of the buildings between them and the 1.5 acre open space fronting he Reserved Channel creates a sense of private front yard for the businesses located there. A narrow street there creating an extension of, possibly, Powerhouse street across Summer St. fronting the Nº. 1 Turbine Room and the BELCo building (and perhaps the remaining section of the Nº. 1 Boiler Room) then running to join another street at the eastern border of the property would open up the park space creating a true sense of shared amenity rather than outdoor seating for private business. In my, admittedly unsophisticated reading of the PRMP for the Fan Pier I got the idea that passive open space adjacent to properties can be assigned to those businesses for their use, that must not be allowed to happen here. Concerns have also been raised concerning emergency vehicle access-an actual street there and along the Eastern edge of the property would allay those fears. 12.4 12.5

"UN Habitat…public ownership "guarantees more stable access and enjoyment over time" while "privately-operated open spaces and facilities are subject to restrictions not governed by the community'" (Garau 2115:25)

"Also, as 'many private spaces open to the public are created to attract consumers," their profit motive alters the nature of public [the] spaces.'" (Garau 2015:25)

"Authorities engaged in gentrifying the areas they govern often operate with a very exclusive idea of 'the public', addressing their services to certain publics and keeping others out of them" (Angotti 2008)

Some "POPS architects willingly create spaces designed not to be attractive" for actual use by the public.

SIDEWALKS/STREETS

Redgate's plan to widen the sidewalks adjacent to their property by moving it onto their property does nothing to address the accessibility issues of the sidewalk along the rest of First St. It also allows for a widening of Summer St. and creates a legal wall of private property along the project's border; this reinforces the sense of a private, isolated development while doing nothing to address South Boston's growth and traffic problems. The sidewalks beyond the Edison lands are not ADA compliant, they are less than inviting to pedestrians and discourage walking along the First street corridor this is in direct conflict with Redgate's stated desire of encouraging

residents of the surrounding community to visit and feel the development is a part of the greater community. The surrounding sidewalks are hardly adequate and allowing Redgate/Hilco to push the walks along their property inward lets the city off the hook, they can continue to ignore the problem until further development along First St makes it a critical issue. The issue is already beginning to negatively impact the neighborhood-the property across First St. has to put their trash out in the street for pick-up, sometimes three barrels deep. In winter where will the snow from these narrow sidewalks end up?

As traffic increases due to this development, and adjacent growth, vehicular traffic will increase without wide inviting sidewalks offering vibrant and varied views and activities, which encourage and reward walking. It will not matter how wide the sidewalks are at the Edison if all the walks leading to it are narrow broken and uninviting.

Actual full, intermodal streets allowing all modes of transportation fully integrated into the surrounding, established street grid would work best to tie this development in the greater community. This would provide most inviting and varied opportunity for exploration and discovery of any proposed offerings. Allowing for full pass-through traffic invites all members of the community to wander, try new routes and discover new retail and leisure opportunities. Business dies in dead traffic eddies. Also full city streets as opposed to private ways impart a sense of ownership and community-to all residents. An easement granted to the public to access the development's lands is a far cry from ownership. To be allowed to enter the site on the sufferance of the private owners is not enough, nor is it a guarantee of full liberty. 12.6

While Redgate's promoters talk of inclusion their own traffic experts have admitted that their design is meant to discourage through traffic and they more than once referred to their "streets" as driveways (Sept. 26 IAG meeting). This is very telling. At the same time the rest of the community is being forced to accept increased traffic and all the problems this entails; to allow the Edison development to isolate it's future tenants from this hazard is a slap in the face to the community.

The proposed street plan as already mentioned is designed to stymie through traffic. This is antithetical to inclusive urban design. This is meant to deter, if not outright prevent integration (ironically) with the rest of South Boston. Nearly half the streetscape serves merely as driveways for internal residents or outdoor space for onsite business.

A real benefit for this community stemming from this development would be the narrowing of First St, in conjunction with the already outlined widened sidewalks. Since rail and truck traffic no longer needs First Street (First Street is wider than the other east-west streets because it once had a rail line down it servicing the heavy industries located there. Narrowing First St. would benefit the neighborhood by slowing down traffic and creating a safer and more inviting environment for pedestrians and bicyclists 12.7

While this is not the responsibility of Redgate/Hilco the city and state must address the issue of through traffic impacting South Boston before any major development is allowed-especially adjacent to arterial corridors.

Throughput traffic must be drastically slowed and reduced before any more density is foisted upon us. Traffic must be slowed and South Shore commuters need to be encouraged to seek alternative routes or alternative methods of commuting. Summer St. should be narrowed to one auto lane each direction like L St. the traffic signals should be timed to further slow traffic during rush hour, although transit priority signally should be in place. First St., likewise would be narrowed to the width of our other east/west streets by the widening of its sidewalks. It is patently unfair for the BPDA & Redgate/Hilco to talk about shared streets and pedestrian ways within the development without addressing the problematic conditions around the site. 12.8

PUBLIC TRANSPORTATION

Our existing bus service is inadequate and adding more buses, private or otherwise will do nothing over the long term to address the problem. Ongoing development and marketing to young professionals will only continue to increase transit demand throughout South Boston. You can't keep adding more cars and buses to a finite road infrastructure. The only solution for the long term is light rail. LR is cheaper to run per passenger mile. The life expectancy of rail cars is nearly treble the life expectancy of buses, LRV capacity is greater and they provide a superior ride. A "trolley" from North Point down First to P St. to Fourth St. to L St. down Summer to South Station and returning via E. Broadway using the right lane of Summer/L Sts. exclusively would be a step in the right direction. Eventually a branch could be added turning down D St. to serve the South Boston Waterfront by linking up with the Silver Line. The equivalent of busbulbs could be used as surface street stops and the lane could be utilized for emergency vehicles as well. This would also fit in with accepted traffic calming measures by narrowing the Summer/L St. corridor discouraging throughput traffic. 12.9

Redgate's jitney bus plan only lets the MBTA off the hook for the time being and it doesn't provide the greater community with any guaranteed long-term benefit. There is a long history in this city of developers altering agreements a few years down the line once they receive approval. If we are to have greater density thrust upon us there must be mechanisms in place to maintain, if not improve out quality of life.

Tinkering with our current bus routes by eliminating stops or abbreviating the return trips is a reduction is service not a solution to our problems. The should not be simply to speed up bus trip times, it should to provide more efficient service to greatest number of passengers.

While it hasn't been discussed I have a suspicion that the developers are expecting a large majority of their target audience to utilize ride sharing-this form of transportation is showing itself to be anything but efficient. Flooding our community with more automobile trips and increased pollution that comes with that and excessive idling as drivers sit waiting for passengers.

PARKING

In general more parking means more cars, however less parking doesn't necessarily mean less cars-if viable options don't exist. Creating a situation where car ownership becomes unaffordable only hurts those too poor or too slow to obtain limited off-street parking. It is an inequitable situation. The extremely limited number of on-street parking spaces on-site further serves to isolate the development from its surroundings. Streets should be a public asset and as such, be available to all. Just as my neighbors can freely park in front of my house, so too, should they be able to park anywhere within the Edison site. If the streets within the development are not a public asset, available to all, at all times, then residents of the site should not be issued South Boston parking permits. 12.10 The developers also propose grade level parking in two buildings; grade level parking creates dead, blank first floors, which discourage walkers, and lessens the "eyes on the street". Interior parking should be required to be below grade or above occupied ground floors. 12.11 Some part of this development should be set aside for a moderately sized parking structure free to all South Boston residents with a South Boston parking permit twenty four hours a day, seven days a week, paid for with a small surcharge on the rents or condo fees of all market rate units on site. 12.12 That would be a fair and decent contribution to the surrounding community for the burden imposed on it.

SECURITY/LIABILITY

If this site is to remain private property, who is going to police it and what authority will they have over persons traversing the site? To whom will they be accountable? 12.13 What recourse will a member of the public have in case of a conflict? Private security is not usually up to the level of police in training. Will there be security cameras? 12.14 If so who will have access to the footage and for what purpose? How long will it be saved? Will Boston police or Massport police patrol the site? What will be the level of 12.15 that coverage if any? How will their authority be affected by the fact that it's private property?

In this era of increased violence against the public what liability is Redgate/Hilco willing to accept regarding public safety? How much thought, regarding violence 12.16 against public gatherings, have the designers put into the design of their pedestrian only, shared streets and boardwalks?

I mention this again: What of the right of citizens to peaceably assemble: to protest 12.17 or picket a business on site for example? There have been numerous court cases in various states regarding this issue. Where does Massachusetts law and city ordinance stand on this? What rules will exist regarding use of "public space"? Will a not-for-profit "common area entity" similar to the one on the Fan Pier be set up? Will rules be written to control who is granted access to the "public amenities" like on the Fan Pier? What sort of oversight will the city and state exercise?

Who will oversee enforcement of any rules regarding delivery vehicles and the like? 12.18 What's to stop delivery trucks from entering the site any way they choose and blocking travels lanes as is done all along the South Boston Waterfront daily?

HISTORIC PRESERVATION

Sadly, I believe, the developers are only paying lip service to historic preservation. The current claim is they are saving three buildings. In my opinion that is a piece of semantic acrobatics. In reality they are only "saving" one very small structure-the original fireproof document storage building. The other structures are only parts of two other buildings. They plan to leave standing, for the most part, the three turbine rooms of the original Edison Electric Illuminating Co. and the engine room of the Boston Electric Light Co. while demolishing the boiler houses of both and all other associated structures. The word preservation can only be applied in the very loosest terms when reviewing their plans.

The half of the BELCo plant is to become hall of some sort with one wall replaced by a glass curtain (in the plans presented) While the team claimed the proposed hotels wouldn't have large function rooms it was stated this structure could be used to host events for the hotels! 12.19

As for Edison Station Nº. 4 Turbine rooms, all will have their tile work pierced along the side walls for windows. The first room is to become a sort of Quincy market/Eataly affair while the next room will be pierced by a street and housing a small museum style space. The final room is slated to become an office building-this is the room facing first street, so the much ballyhooed grand turbine hall would be cut off from the adjacent community and of course not all on view as was initially implied. I would also note the side walls of the turbine rooms were never meant to be exposed to the elements, nor the interior dividing wall of the BELCo building. As a result they have no architectural features on what will be their exteriors. Will they have features such as cornices added? Will the cornice of the north face of turbine room Nº. 1 be restored? Will it's ornate lanterns be replaced? 12.20

I am disheartened that no effort seems to have been made to preserved the unique and beautiful remains of the original sections of the EEICo boiler room walls facing the Reserved Channel and Summer St. 12.21 In nearly a year of research I have found not a single historic power station with large segmental arch windows with or with out the capping lunettes on the Summer St. side. Since they will not be imploding or knocking down any structure on site, but dismantling them I see little reason these two magnificent wall sections cannot be saved and repurposed. Many much more monumentally scaled structures have been preserved across the globe and a few minutes on the web will provide a plethora of innovative repurposing of similar structures. Preserving these wall would in fact help knit this development into the surrounding community. We have been looking at these elegant walls for over a century they are as much a part of this neighborhood as Castle Island or Dorchester Heights. Removing the New Boston station and the 1922 boiler house extension allows a tremendous amount of flexibility in what can be done with the remaining walls and surroundings. Without at least some sections of the boiler rooms the turbine/engine rooms of the two plants are removed from any sort of context explaining how they functioned. Without the steam generated by the boilers, the engines could do nothing. The "preservation" proposed is in my opinion the barest of minimums designed to maximize the developer's profits. This city does a very poor job of preserving its history with the noted exception of its colonial history. This

power plant is an important part of the history of power generation in the U.S. we should be looking at a much more serious level of preservation and interpretation.

CLIMATE RESILIENCE/HARBORWALK

While I am fully in favor of climate resiliency and restoring flexibility to our coastlines I am disappoint in the manner Redgate/Hilco presented their plans. Originally we were told there would be a 1-½ acre park on the waterside of the project. Then we began hearing larger numbers as all the open space on site was factored in. Talk of open-air theater/concert space and water taxi was heard multiple times. In reality about half the space presented as park land on the water side of the site will be set aside for flood control and may well be submerged by high tide in fifty years. This reality should have been clearly and succinctly presented to the community on day one. The neighborhood needs all the facts laid out clearly and right away if we are to craft an informed opinion on the proposal.

The remaining open space other than the boardwalk takes on the appearance of commercial space set aside for the hotel or other business onsite. There are important psychological factor involved in designing open space in an urban environment. Space can be made to be appealing and inviting to everyone or it can send subtle signals that only certain people are welcome. None of the drawings I've seen seem inviting to me.

Since so much of the space currently set aside is at risk of loss to the harbor, I feel Redgate must supply more open space. They must provide enough space to counteract the increased demand on our public parks that their residents will create. The playing fields of M St. Park are already feeling pressure from the residents of the South Boston Waterfront much further away. A nice, small park could be created in the shadow of a saved Boiler house wall along Summer St. I would also propose a large adult organized playspace on the roof of a building onsite: basketball or touch football, maybe a batting cage to take some pressure off the playing fields of M St. Park. 12.22 12.23

TRANSPARENCY

Throughout the series of meetings I have attended I can't help but feel a certain lack of transparency and real give and take discussion. Many questions get non-answers and follow-up is limited. And, unfortunately there has been some contradictions presented. It's important that when all is said and done that any agreements and promises must be enforceable by a legal mechanism. The community must have a way to hold Redgate/Hilco and any successor firms to all agreements and those agreements made permanent. 12.24

GOVERNMENT

South Boston is. as are many other neighborhoods across Boston, under assault. Our very fabric is under attack. Our institutional memory is being erased by a rush for private profit and tax revenue. Our poorest and most vulnerable neighbors are being trampled in the gentrification stampede. All we have known is at risk. As an example, Realtors are renaming sections of our neighborhood with the apparent blessing of

city officials and wiping away decades of history. We are overrun with wealthy transients who have no regard for the rest of us. As I have said I am opposed to this development, even though I have little doubt it will be built much as presented with or without community approval. Our elected officials must act and work to put real, working solutions to our problems in place before this project is built. Amelioration of the problems this development will exacerbate is not only the responsibility of Redgate/Hilco; the Commonwealth and the City must find the political will and the money to give us real improvements in transportation, publically owned open space, schools, housing, police and fire protection. The city of Boston is the heart that keeps the blood of the Commonwealth pumping, but our arteries are severely clogged and unless something is done soon something is going to give. And it will cost us much more to deal with it after the fact.

Yes, neighborhoods change. Change is, in fact, as has been said so very often, the only constant. But as Jane Jacobs teaches us it must be at a measured pace so not to overwhelm. This development as presented overwhelms.

Regards,
J.F. Bennett

GAVIN FOUNDATION, INC.

AAWOL Program, Center for Recovery Services, Charlestown Recovery House, Cushing House Boys, Cushing House Girls
Devine Recovery Center, Gavin House, Graduate Centers, Hamilton House, Quincy ATS/CSS, Total Immersion Program, Walsh Community Center

675 East Fourth Street, P.O. Box E-15, South Boston, MA 02127
617-268-5517 www.gavinfoundation.org

Tim Czerwienski
Boston Planning & Development Agency
One City Hall Square
Boston, MA 02201
bostonplans.org

Re: 776 Summer Street, South Boston (L Street Station Redevelopment)

Dear Mr. Czerwienski:

I am writing to express my concerns about the proposal to develop the former Boston Edison plant at 776 Summer Street in South Boston. As a local resident and President/CEO of Gavin Foundation a Non profit, I have seen many neighbors, friends, family, employees and clients forced to move because of high rents. The proposed development of the Edison Plant will have serious negative impacts on our neighborhood and fails to address the urgent need for affordable housing for working families and the elderly.

The revised development proposal includes over 1,300 units of housing. To address the need for affordable housing in South Boston, the developer should commit to a much higher percentage than the 13% minimum City of Boston requirement of affordable housing on site. I strongly believe that this development site should include at least 25% deed restricted affordable units. Housing should be available for a range of income levels, including low income seniors and middle income families. Both lower income and middle income residents are being displaced in South Boston because of rapidly increasing real estate prices. 13.1

The City's Inclusionary Development requirement is not adequate to address this critical neighborhood need because the income levels for IDP units are not low enough to address the needs of low income workers who earn less than $50,000 annually. Elderly residents are most at risk of displacement because their income is usually below $25,000 annually.

South Boston deserves a greater percentage of affordability to mitigate the impacts of this project. We do not need more luxury housing; we need ownership and rental opportunities for working families and deeply affordable housing for the elderly.

Thank you for this opportunity to comment.

Best Regards,

Tim Czerwienski <tim.czerwienski@boston.gov>

Letter of Support for development at 776 Summer Street

Tue, Oct 30, 2018 at 4:00 PM

To: tim.czerwienski@boston.gov

October 28, 2018

Tim Czerwienski - BDPA

Dear Mr. Czerwienski

Please accept this as a letter of support for the Arts and Industry concept proposed by Hilco-Redgate the developers of the former Edison power plant located at 776 Summer Street, in South Boston.

I am writing this letter of support as president of the South Boston Arts Association, with the approval of our Board of Directors and the general membership … as well as myself ... individually.

My name is Dan McCole, an active professional artist, and I live at 516 East Second Street, just three (3) blocks from the former Edison site. I was born and spent the first 28 years of my life at 853 - 854 East Broadway, (between N' and 'O' streets) just 3 and a half blocks from the site. I am very familiar with the property.

As an active artist and a community minded activist ...for the past eight years I have served as the head of a sub group seeking to create an Arts and Cultural center for our community for the benefit of the residents and the arts in general.

When Hilco-Redgate reached out through a well-advertised program of public meetings, asking the residents of South Boston for their ideas concerning the development, I joined with many members of our arts group, attending all eight public meetings in 2917 and subsequent meetings by the BPDA in 2018 and offered our proposals for an arts based cultural center to be included in their plans.

During the planning sessions, the developers proposed their ideas, listened and answered questions. It was apparent that the developers wanted a sense of what South Boston residents would prefer, and what the community in general wanted the developers to do to ensure and enhance the life style and safety of the South Boston community.

South Boston has changed dramatically during the past ten years. Many long-time residents find themselves with more traffic, less parking and a loss of the Southie community life style and independency. A new and younger generation has moved in and as much as they are welcomed ... they will, hopefully, be more involved in our community life. A Cultural Center will be in the best interests of South Boston as it will create a venue that would bring the new and the long-time residents together for betterment of the community.

Hilco-Redgate has heard our proposals and have agreed to the creation of Arts and Industry concept in their development plans and are seriously considering a South Boston Community Arts Center.

This is an excerpt from the latest Hilco-Redgate promotional flyer.

"*We would like to have an indoor and outdoor programming on the ground floor across the site in a way that creates an 'Arts and Industry' district that is inviting to artists, artisans and makers of all kinds. We are working with some local South Boston arts, cultural and history groups to better understand what indifference spaces and places best work at the site.*"

I believe, along with the SBAA Board and membership, that a Cultural Center would be in that best interests of the community, creating a reading, painting walking and meeting venue for all long-time and newer residents in very positive ways.

Sincerely,

Dan McCole, president

South Boston Arts Association
516 East Second Street
South Boston, MA 02127

October 30, 2018

Boston Planning and Development Agency

One City Hall Square
Boston, MA 02201

Attn: Mr. Tim Czerwienski, Project Manager

Subject: Comments on: HRP 776 Summer Street LLC Proposal for Redeveloping the 15.2 Acre Coal Power Plant Site on the South Boston waterfront

Submitted on behalf of **South Boston Open Space, Mr. Joseph Cappuccio** and **Gate of Heaven Neighborhood Association, Mr. Kevin Lally, President**

Comments:

1. The proposed development with the combination of Housing, Commercial Space, Office Space, Retail Space and Hotel Space is of immense concern to residents. The traffic, parking problems and congestion in the area is already at a critical point. The addition of this proposed development would create a nearly impossible situation for residents and those who use the already crowded streets for their personal lives and business; 15.1
2. The primary subject of this comment set, however, is the risk to the neighborhood's residents, especially children, from the known contamination associated with demolition, decommissioning, remediation and redevelopment of an old, coal burning power plant; 15.2
3. The specific issues are: (a) Establishing a complete picture of the hazardous substances within the coal plant buildings, both qualitative and quantitative, and in the on-site soil and groundwater within the plant property boundaries. **The residents want the assessments to be done immediately and results made available to residents before demolition is carried out. This includes each contaminant and its exact location on the site. Residents want the testing on plant surfaces carried out, the results made available within 90 days of this letter. At that time, another public meeting must be called to discuss results and review specific plans.** 15.3

   (b) Also, residents want the open areas around the plant, **particularly the existing playing fields, to be assessed as a baseline along with the building and soil/groundwater assessment inside the plant boundaries, and results made available to residents before any approvals to proceed are made final;**

   (c) Should approvals be obtained for some scaled down version of this project which properly consider traffic and congestion, the playing fields and open areas should be reassessed to be sure that the demolition, trucking and transport of contaminated

building materials, particularly the creation of airborne contaminants, has not impacted public spaces where children are frequently present.

(d) In-plant surfaces as well as the soil and groundwater should be assessed for **asbestos, 14 MCP metals, PCBs, a full spectrum of petroleum product residues, including SVOCs. Soils and groundwater must also be assessed for chlorinated solvents, i.e., PCE, TCE, DCE and VC.** Tabulated results should be sent to residents within two weeks of sample collection. Work should proceed only after sufficient time has been allowed for discussion. **The Dust Control, Monitoring and Reporting Plan** must be made available to residents for careful review before any demolition is carried out;

4. In terms of the **increased congestion that must result** from this project in any form, consider use of a ferry terminal (such as the one that is part of the casino development in Everett), and innovative "people mover" solutions like a monorail to the MBTA. The Developer must pay for these additional solutions to ease the increased crowding, traffic and parking issues bound to result from it. One immediate suggestion is to consider utilizing existing untapped capacity on inbound buses from South Station that come to City Point during AM peak hours and from City Point during the PM, essentially empty. Utilizing this existing infrastructure will keep bus emissions the same. Also, consider any other means of minimizing exhaust emissions from vehicles. 15.4

The residents insist that these issues all be answered specifically and in detail, with adequate timelines for response, not just in "broad-brush" assurances. The developer's comments, that he does not know the type of contaminants in the building or the extent of contamination does not instill a sense of safety or confidence for residents. His comment that everything will be taken care of according to state regulations also is cause for concern. The residents should know what contaminants are present and what the actual remediation plan looks like, prior to any permits being issued. Construction management procedures will need to include specific plans for mitigation of possible impacts to loading, transport and cleaning of vehicles to minimize the potential for spreading contamination into the neighborhood. These all will fall under the realm of construction management, which has not been addressed sufficiently.

Respectfully Submitted:

William J. Mallio

William J. Mallio, Ph.D., LSP

20 Westland Avenue, Winchester, MA 01890

Cc: Mr. Glen Hannington, Esq.

273 D Street
South Boston
MA 02127
617.268.9610
617.268.4813

October 30, 2018

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

Re: 776 Summer Street, South Boston (L Street Station Redevelopment)

Dear Mr. Czerwienski:

On behalf of South Boston Neighborhood Development Corporation and as a resident of South Boston, I respectfully submit the following comments regarding Redgate/Hilco's proposal to redevelop the former Boston Edison plant at 776 Summer Street in South Boston. South Boston NDC represents over 250 low and moderate income residents of South Boston: working people, families, Veterans and the elderly. These residents would likely have been priced out of this community without the housing SBNDC is able to offer. Several hundred households are on our waiting list, and we have few apartments available.

The proposed development of the Edison Plant will have serious negative impacts on our neighborhood, including displacement due to increased real estate costs. It fails to address the urgent need for affordable housing. The revised development proposal includes over 1,300 units of housing. To address the need for affordable housing in South Boston, the developer should commit to at least 25% affordable housing on this site. Housing should be available for a range of income levels, including low income seniors and middle income families. Both lower income and middle income residents are being displaced in South Boston because of rapidly increasing real estate prices. 16.1

The City's Inclusionary Development requirement is not adequate to address this critical neighborhood need because the income levels for IDP units are not low enough to address the

needs of low income workers and seniors who earn less than $50,000 annually. Elderly residents are most at risk of displacement because their income is usually below $25,000 annually.

South Boston deserves a greater percentage of affordability to mitigate the impacts of this project. We do not need more luxury housing; we need ownership and rental opportunities for working families and deeply affordable housing for the elderly.

Thank you for this opportunity to comment.

Best Regards,

Donna Brown

Executive Director

POWER HOUSE COMPANY
C/O KING ASSOCIATES, LLP
60 K STREET
BOSTON, MA 02127

October 30, 2018

Mr. Brian Golden, Director
Boston Planning & Development Agency
One City Hall Square
Boston, MA 02201

RE: L Street Station Redevelopment Project (776 Summer St)

Dear Director Golden:

I am writing to you regarding the above referenced project (the "Project") proposed by HRP 776 Summer Street LLP (the "Proponent"). I am one of the partners of Power House Company ("PHC"), which owns the property known as King Terminal, sited directly across Summer Street from the Project.

As noted in my letter of July 11, 2018 (the "Letter", copy attached), the proposals that have been submitted to the BPDA by the Proponent raise concerns for PHC relating to traffic congestion, possible increased use of PHC's private ways and public safety.

Upon receipt of the developer's DEIR/DPIR dated August 2018, PHC engaged BSC Group to perform an independent review the potential traffic impacts of the proposed project. Their report is attached.

We ask that the Proponent respond to the issues raised in the BSC report, in particular with regards to detailed analysis and design of the intersections where Elkins Street and Power House Street meet Summer Street.

PHC continues to be concerned that extending Elkins Street into the Project will encourage drivers to access the portion of Elkins Street that passes through King Terminal as a cut through between East 1st Street and Summer Street. We are also concerned that increased traffic will make Power House St attractive as a cut through as well.

The August DEIR/DPIR does not appear to have addressed these concerns. PHC is hopeful that careful and collaborative design of the intersections will reduce or eliminate this possibility.

As previously noted, the Proponent has been very cordial with us and the neighborhood, and PHC is generally supportive of the Project, which should be a great enhancement to the site.

However, we want to make sure that our concerns are addressed in a concrete manner, to include detailed intersection designs agreed to as part of any approvals issued by the BPDA for this project.

Director Golden, thank you for your time and consideration in this matter,

Sincerely,

Gordon B. Coughlin

POWER HOUSE COMPANY
C/O KING ASSOCIATES LLP
60 K STREET
BOSTON, MA 02127

July 11, 2018

Mr. Brian Golden, Director
Boston Planning & Development Agency
One City Hall Square
Boston, MA 02201

RE: 776 Summer Street, South Boston (Edison Power Plant) Proposal

Dear Director Golden:

I am writing to you regarding the project proposed by HRP 776 Summer Street LLP (the "Proponent") for the 15.2 acre site at 776 Summer St., South Boston (formerly the Edison Power Plant). I am one of the partners of Power House Company ("PHC"), which owns the property commonly known as King Terminal, which is sited on over 12 acres directly across Summer Street from 776 Summer Street. As a direct abutter, we have reviewed the PNF and Scoping Determination, and have met with the developer on several occasions.

The development proposal submitted to the BPDA by the Proponent raises concerns for PHC relating to traffic congestion, possible increased use of our private ways, environmental issues, and public safety.

Traffic congestion in the neighborhood has increased dramatically in the last few years, and this proposal would contribute to an increasingly unmanageable situation. We would like to understand how traffic impacts of this and other projects in the area will be mitigated.

The Proponent's plans show a new road into the 776 Summer Street parcel, which lines up with and apparently is considered by the Proponent to be an extension of Elkins Street. Elkins Street is a private way owned by PHC that runs between Summer Street and K Street. In addition, there is another private way that crosses King Terminal, Power House Street, which runs parallel to Elkins Street. Both Elkins Street and Power House Street lie entirely on property owned by PHC, and both streets are reserved for the use of tenants and guests of King Terminal, and certain abutters.

We are concerned that extending Elkins Street into the new 776 Summer Street development will encourage drivers to access the portion of Elkins Street that passes through King Terminal as a cut through between East 1st Street and Summer Street, causing additional traffic and congestion within King Terminal, and increasing risks to

pedestrians and drivers using Elkins Street. We are also concerned that with increased traffic in the area Power House Street also might be used as a cut through between East 1st Street and Summer Street.

We would like to know how the Proponent will limit their customers, visitors, tenants, etc. from using Elkins Street and/or Power House Street.

Other concerns with the current proposal include public safety and environmental issues during the demolition and cleanup process, with potential health risks of contaminants drifting into our property, as well as maintaining unimpeded access to our property during construction.

While the developer has been very cordial with us and the neighborhood, we want to make sure that our concerns are addressed in a concrete manner. I strongly encourage the developer to continue further dialogue with us and the neighborhood with a comprehensive transportation study, more accurate descriptions and renderings of the project and measures to address our concerns.

We would like to reserve the right to supplement this letter as we get new information and further review the impacts and issues raised by the proposed development.

Director Golden, thank you for your time and consideration in this matter,

Sincerely,

Gordon B. Coughlin

BSC GROUP
Transportation • Energy • Land Development

803 Summer Street
Boston, MA 02127

Tel: 617-896-4300
800-288-8123

www.bscgroup.com

October 30, 2018

Mr. Bart Coughlin
King Terminal LLC
60 K Street
Boston, MA 02127

RE: Review of L Street Station Redevelopment Traffic Study
South Boston, Massachusetts

Dear Mr. Coughlin:

BSC Group (BSC) has completed a review of traffic and transportation impacts relative to the L Street Station Redevelopment located at 776 Summer Street in South Boston, Massachusetts. The Proponent, 776 Summer Street, LLC, proposes to redevelop an approximately 15-acre parcel located at the northeast corner on the intersection of Summer and East 1st Streets with 1.93 million square feet of mixed use development. King Terminal LLC is an abutter to the proposed redevelopment and is concerned about potential traffic and transportation impacts from the L Street Station Redevelopment.

BSC Group has performed the review based on the following information:

- L Street Station Redevelopment Draft Environmental Impact Report/Draft Project Impact Report (DEIR/DPIR), prepared by VHB, August 2018
  - Chapter 5: Transportation
  - Chapter 12: Response to ENF Comments
  - Chapter 13: Response to PNF Comments
  - Appendix D transportation – Supporting Information
- Field visit performed on Tuesday October 29, 2018

BSC's review was focused on traffic and transportation impacts from the L Street Station Redevelopment on the current and future use of the King Terminal property and offers the following comments:

Project

1. L Street Station Redevelopment is a proposed 1.93 million gross square feet mixed-use development that will include:
   a. 1,344 residential units
   b. 344 hotel keys
   c. 368,000 square feet of office
   d. 85,630 square feet of retail

2. The L Street Station Redevelopment will include two vehicular access points/driveways:
   a. Summer Street at Elkins Street
   b. East 1st Street at M Street

3. The L Street Station Redevelopment will be constructed in five phases over approximately 12-years
   a. Demolition Phase: 2019
   b. Phase 1A: 2020 – 2022
   c. Phase 1B: 2022 – 2024
   d. Phase 2: 2024 – 2030
   e. Phase 3: 2030 – Beyond

Study Intersections

1. A study area comprising fourteen (14) intersections (both signalized and unsignalized) was analyzed. **It is important to note that Power House Street and 803 Summer Street driveway unsignalized intersections were not included in the 14 intersections analyzed.** Turning movement counts from 8/16 were included in the Appendix for the Power House Street intersection but the intersection was not included in the analysis. **Given the volume of FedEx trucks and the number of parking spaces that use Power House Street, the Proponent should include an analysis of this intersection.** 17.1

Traffic Volumes

1. Traffic data was collected for the study area intersections in June 2017. **It is important to note that the Dedicated Freight Corridor (DFC) did not open until Fall 2017.** It appears that supplemental traffic data was collected for the Summer Street/DFC/FedEx driveway in October 2017 and June 2018 and included in the Appendix. Based on our observations, it appears that the current volumes exceed those included in the analysis. 17.2

Crash History

1. Crash history was provided for the 5-year period from 2011 to 2015 and stated that all study area intersections have calculated crash rates that fall below the District 6 average values for signalized and unsignalized intersections. In July 2018, there was a fatal accident at the intersection of L Street and East 6th Street. **Several traffic and safety improvements have been implemented in the L Street corridor since July that should be considered in the Proponent's analysis.** 17.3

Queue Analysis

1. A queue length analysis was conducted for the morning and evening peak hour conditions for the following:
   a. 2017 Existing Conditions
   b. 2024 No-Build Conditions
   c. 2030 No-Build Conditions
   d. 2024 Build Condition
   e. 2030 Full Build Condition

No queue analysis summary was provided for the 2024 Build Mitigated Condition or the 2030 Full-Build Mitigated Condition. The Proponent should provide a queue 17.4

analysis summary for the 2024 Build Mitigated Condition or the 2030 Full-Build Mitigated Condition.

2. The graphical representation of the modeled queues shown on Figures 5.17a through 5.17h only show the queues at the L Street/Broadway and L Street/Summer Street/ East 1st Street intersections. Currently, the morning peak hour queues from the Summer Street/Drydock Avenue/Pappas Way extend to the Summer Street/DFC intersection. **The Proponent should show graphically the queues at the Summer Street/Elkins Street, Summer Street/DFC/FedEx driveway and Summer Street/Drydock Avenue/Pappas Way intersections to show how the queues interact and to determine if the queues will affect operations at other signalized intersections in the study area.** 17.5

Mitigation

1. The L Street Station Redevelopment proposes phasing the transportation mitigation consistent with the Project development phasing. At full-build, the potential mitigation will include the following roadway and signal improvements:
   a. East 1st Street right-turn lane striping
   b. Signal equipment, phasing and timing changes at Summer Street/L Street at East 1st Street
   c. Signal timing changes at L Street at East Broadway
   d. Summer Street reconstruction from East 1st Street to DFC
   e. Signal installation at Summer Street at Elkins Street

   In addition to the physical roadway and signal mitigation identified above, the Proponent is also proposing potential mitigation to include additional MBTA bus service, bicycle and pedestrian accommodations and a service drive connection to the DFC.

   It is important to note that recent changes have been made to the L Street/Broadway and L Street/Summer Street/ East 1st Street intersections. A right-turn lane has been added to the East 1st Street westbound approach and all legs of both intersections have been signed No Turn on Red. **The Proponent should update the analysis to include these recent changes and modify the mitigation commitment as required.** 17.6

2. As part of the Massachusetts Department of Transportation (MassDOT) review of the Environmental Notification Form (ENF), MassDOT stated that "the DEIR should include sufficiently detailed conceptual plans (minimum of 80-scale) for proposed roadway improvements in order to verify the feasibility of constructing such improvements. These plans should clearly show proposed lane widths and offsets, Layout lines and jurisdictions, and land uses adjacent to areas where improvements are proposed." No detailed conceptual plans were included in the DEIR/DPIR submission. **These detailed conceptual plans are required to adequately review the proposed roadway and signalized intersection improvements and their impacts, if any, on the King Terminal property. The Proponent should provide detailed conceptual plans as requested by MassDOT.** 17.7

3. Further discussion of the proposed signal at Summer Street/Elkins Street is required to fully understand the intersection operations and any potential impacts to the King Terminal property. Elkins Street is a private way that provides access to FedEx and the King Terminal buildings and parking. Elkins Street also connects to East 1st Street via K Street. **The Proponent should present solutions to prevent Elkins Street from** 17.8

becoming a cut-through to East 1st Street.

Summary

The Proponent should provide the following additional information and analysis to demonstrate the proposed L Street Station Redevelopment will not create traffic or transportation impacts that will affect the current or future use of the King Terminal Property:

- Inclusion of Power House Street as unsignalized intersection in the Study Area
- Additional review of intersection volumes at the Summer Street/DFC intersection
- Inclusion of the recent traffic and safety improvements to the L Street corridor in the analysis
- Queue analysis for the 2024 Build Mitigated Condition and the 2030 Full-Build Mitigated Condition should be included
- The queues at the Summer Street/Elkins Street, Summer Street/DFC/FedEx driveway and Summer Street/Drydock Avenue/Pappas Way intersections should be shown graphically to show how queues interact
- Detailed conceptual plans (minimum of 80-scale) for proposed roadway improvements should be provided
- Further discussion of the proposed signal at Summer Street/Elkins Street

Please do not hesitate to contact our office with any inquiries you may have.

Sincerely,

BSC Group, Inc.

Sam Offei-Addo, P.E., PTOE
Senior Project Manager/Senior Associate

cc: John. Hession, P.E.

BOSTON HARBOR NOW
Are you on board?

15 State Street, Suite 1100
Boston, MA 02109
617.223.8671
bostonharbornow.org

October 30, 2018

Via email to: tim.czerwienski@boston.gov

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

Re: L Street Station Draft Project Impact Report

Dear Director Golden,

On behalf of Boston Harbor Now, thank you for the opportunity to comment on the Draft Project Impact Report (Draft PIR) for the L Street Station Redevelopment submitted by HRP 776 Summer Street LLC (HRP). Our policy and planning team has reviewed the project presentation, toured the project site on several occasions, and attended a series of public meetings held throughout the summer.

As presented in the Draft PIR and following the May 2018 Designated Port Area (DPA) Designation Decision issued by the Office of Coastal Zone Management, the landward portion of the proposed 15-acre redevelopment is no longer part of the South Boston Designated Port Area along the Reserve Channel. Of the total land area, 4.1 acres are on filled tidelands and within Chapter 91 jurisdiction. Because the proposed development is for a non-water dependent use, the project requires a new Chapter 91 license.

Project Description
As described in the Draft PIR, the current proposal is for the redevelopment of 15 acres of land along the Reserve Channel in the South Boston waterfront. Since the filing of the Project Notification Form, the project has been reduced from 2.1 million SF to 1.93 million SF. The

amended building program proposes to increase retail use, increase office use, more than double hotel use, increase parking options, and decrease residential use. The seven-building proposal now includes:

- 85,630 SF of retail space,
- 368,070 SF of office space,
- a 344-key hotel,
- 1,397 parking spaces to be shared between office and residential users, and
- 1,344 residential units

The height of the proposed buildings ranges from 82 feet to 210 feet with the lowest buildings facing the South Boston neighborhood and the tallest buildings located along the Reserve Channel and Summer Street.

Existing Maritime Industrial Uses

The project site is bordered by the South Boston neighborhood to the south, the Conley Terminal Dedicated Freight Corridor (DFC) to the north, and maritime industrial uses to the East and West. As well-known amongst stakeholders, Massport is investing nearly $35 million in a series of facilities and operational improvements in anticipation of increased growth and container activity at Conley Terminal.

The Dedicated Freight Corridor is Boston Harbor's major truck route serving Conley Terminal with heavy industrial traffic at all hours of the day and night. It is essential that the proponent continue to work with the Massport Maritime Department to ensure that the proposed mixed-use development minimizes all potential impacts to truck access and existing working port businesses. To ensure that port activity continues to be a key component of the regional economy and also balance non water dependent use in the area, Massport has made significant efforts to move port traffic and activity away from existing residential uses.

The Draft PIR suggests expanding the use of the DFC to include service vehicles traveling to and from the 15-acre site. While this may be an alternative that is worthy of further discussion, we feel strongly that all DFC use must prioritize and benefit the existing maritime operations before a private non-water-dependent project considers using the route even on a limited basis. Section 1.4 of the Draft PIR offers signage as a means to deter passenger vehicles and pedestrians from accessing the DFC. Signage alone is unlikely to deter passenger vehicles, pedestrians, and cyclists from accessing the DFC.

To ensure that Conley Terminal operations and other related maritime businesses are not adversely impacted, the final PIR should clearly define "service vehicles," specify any potential time of day restrictions, limit the use of the DFC to off-peak truck traffic hours, and describe gates or security checkpoints under consideration. 18.1

Open Space and Programming

We continue to have concerns about the characterization of current maritime-industrial activities at DFC and nearby Conley Terminal operations. Boston Harbor, especially at Conley Container Terminal, is an active industrial area that inevitably adds a significant amount of noise, dust, and vibrations to abutting spaces.

The Draft PIR includes new details for the proposed public areas along the northern edge of the site, closest to the DFC. We understand the design challenge—given the nature of marine industrial operations nearby—and encourage the team to more carefully consider the layout and programming of the public areas along this edge. They must reconcile two very different uses--general public use and the continued industrial operations of Conley Terminal and other working port businesses. The final PIR should do more to describe and depict details of the observation deck, waterfront boardwalk, waterfront plaza, performance plaza, and overlook. 18.2

Figures 3.3, 3.4A, 3.4C, and 3.4E include a dozen examples of outdoor spaces and construction materials used in similar industrial areas around the country. We appreciate the proponent's efforts to present a diverse set of open space experiences for the general public. We are especially pleased with the focus on arts and culture and would welcome the opportunity to work with the proponent to further define the public realm plan and best practices for waterfront programming and activation.

Transportation

As proposed, this development will add a substantial number of new residents and workers to the sidewalks, bus routes, and roadways of South Boston.

The Draft PIR states the proponent will include a total 1,397 on-site parking spaces. As a general principle, we favor public transportation solutions that benefit a broader section of the population. Increasing the number of parking spaces does little to address the much-needed transportation improvements in South Boston. We understand that the project is responding to the community's current parking demands, but this approach directly conflicts with the City of Boston's efforts to be carbon-neutral by 2050.

There are five existing MBTA bus routes within walking distance (10 minutes or less) of the project site—route 5, 7, 9, 10, and 11. Only one, Route 7, has a stop immediately adjacent to the property along Summer Street and is the only bus option for inbound service across the Reserve Channel to the Seaport and Downtown. As confirmed by the Draft PIR, during peak commuting hours this route is near capacity and does not operate at all on Sundays. While we appreciate the proponent's willingness to kick off a supplemental bus service as soon as site demolition begins in 2019, we have questions about the proposed pilot program. For example, additional information about management, staffing, schedule of operation, and incorporation of the pilot into existing bus tracking technology should be provided in future project filings. 18.3

With the nearest T station more than a 10-minute walk from the site, increased access to public transportation is a critical issue that needs to remain a priority for this project. We encourage collaboration with the MBTA to fund expanded or enhanced service in this route, especially with a city proposal to add a bus only lane to Summer Street. We look forward to additional transportation discussions as the project progresses. 18.4

Finally, this 15-acre site and development is large enough to warrant a new Blue Bikes station. We are pleased to learn that the proponent is committing to installing at least one additional Blue Bike Station dock at this location. 18.5

Climate Resilient Design

As presented in section 4.4.2 of the Draft PIR, the finished floor elevation for the project will be 21.5' BCB, two feet above the base flood elevation of 19.4' BCB. The site resiliency plan found in Figure 4.3 proposes to increase the site elevation, improve stormwater collection, implement permeable paving, use light-colored materials, and increase the number of shade trees. These are commendable initial steps and we applaud the proponent for including them in the early design stages of the project.

After the project proponent submitted the Draft PIR and before the closing of the public comment period, Mayor Martin J. Walsh publicly announced the City of Boston's Resilient Boston Harbor vision plan and released the Coastal Resilience Solutions for South Boston report. Both the vision plan and the report present the City's district-scale climate adaptation solution for Boston Harbor. This site is part of the Reserve Channel mid-term and long-term solution that can provide flood protection critical to reducing flood risk across South Boston.

Design detail and strategies that embrace the City of Boston's district-scale solution should be a priority for climate resiliency at this site. We look forward to reviewing additional resiliency measures proposed in the Final PIR and continuing to refine site design measures as the project progresses. 18.6

Thank you for the opportunity to comment.

Sincerely

Jill Valdes Horwood
Director of Policy

Appendix B: Public Comments

All public comments will be included in the electronic copy of the filing posted to the BPDAs project page at the link below. Copies of this information can also be obtained by contacting Seth Lattrell at SLattrell@vhb.com or (617) 607-2973.

http://www.bostonplans.org/projects/development-projects/776-summer-street

Appendix C: Transportation & Parking

Table C-1 Signalized Intersection Capacity Analysis – Morning Peak Hour
Table C-2 Unsignalized Intersection Capacity Analysis – Morning Peak Hour
Table C-3 Signalized Intersection Capacity Analysis – Evening Peak Hour
Table C-4 Unsignalized Intersection Capacity Analysis – Evening Peak Hour

Signal Warrant Analyses

- Summer Street at Elkins Street – 2017 Existing
- Summer Street at Elkins Street – 2030 Full Build
- East 1st Street at M Street – 2017 Existing
- East 1st Street at M Street – 2030 Full Build

Table C-1 Signalized Intersection Capacity Analysis – Morning Peak Hour

		2017 Existing						2030 No-Build						2030 Build					
Intersection	Approach	Demand (vehicles)	LOS	Delay (s)	v/c	50th % Queue (feet)	95th % Queue (feet)	Demand (vehicles)	LOS	Delay (s)	v/c	50th % Queue (feet)	95th % Queue (feet)	Demand (vehicles)	LOS	Delay (s)	v/c	50th % Queue (feet)	95th % Queue (feet)
1. Summer Street at Drydock Ave/Pappas Way	Pappas Way EB Left/Thru/Right	230	C	24.0	0.59	117	#349	**248**	C	27.5	0.69	133	#390	259	C	29.6	0.72	142	#411
	Drydock Avenue WB Left/Thru	170	C	21.5	0.47	80	#252	**205**	C	23.8	0.58	103	#318	205	C	23.9	0.58	103	#318
	Drydock Avenue WB Right	80	B	10.2	0.06	0	30	**115**	B	10.4	0.09	0	35	126	B	10.5	0.10	0	37
	Summer Street NB Left	10	D	35.5	0.18	5	21	**11**	D	36.4	0.20	6	22	11	D	36.1	0.20	6	22
	Summer Street NB Thru/Right	1,145	F	374.3	1.74	~602	#727	**1,278**	F	466.0	1.94	~706	#831	1,352	F	519.0	2.06	~770	#895
	Summer Street SB Left	250	F	193.6	1.30	~163	#324	**361**	F	439.6	1.87	~324	#507	335	F	379.7	1.74	~286	#465
	Summer Street SB Thru/Right	450	C	23.4	0.54	135	187	**485**	C	24.2	0.59	149	205	781	C	28.2	0.74	212	284
	OVERALL	**2,335**	**F**	**204.4**	**1.00**	**-**	**-**	2,703	**F**	**275.8**	**1.18**	**-**	**-**	**3,069**	**F**	**282.9**	**1.22**	**-**	**-**
2. Summer Street at Dedicated Freight Corridor	Fed Ex Driveway EB Left/Thru/Right	30	C	32.8	0.33	12	47	**32**	D	38.6	0.38	18	49	32	D	40.4	0.38	18	49
	DFC WB Left/Thru	15	C	32.0	0.17	6	28	**16**	D	37.6	0.19	9	29	16	D	39.3	0.19	9	29
	DFC WB Right	55	C	24.8	0.20	9	41	**59**	C	27.1	0.21	14	44	59	C	28.8	0.21	14	44
	Summer Street NB Left	0	-	-	-	-	-	**0**	-	-	-	-	-	0	-	-	-	-	-
	Summer Street NB Thru/Right	1090	B	11.1	0.67	179	461	**1,219**	B	14.3	0.74	261	#602	1,277	B	14.6	0.76	284	#648
	Summer Street SB Left	90	A	5.2	0.42	6	34	**94**	B	10.2	0.55	9	76	94	B	13.5	0.57	11	80
	Summer Street SB Thru/Right	510	A	2.5	0.24	28	86	**567**	A	2.4	0.26	33	98	757	A	2.7	0.34	48	140
	OVERALL	**1,790**	**A**	**9.4**	**0.60**	**-**	**-**	**1,987**	**B**	**11.6**	**0.68**	**-**	**-**	**2,235**	**B**	**11.4**	**0.69**	**-**	**-**

Analysis based on Stantec Program from May 21, 2019

		2017 Existing						2030 No-Build						2030 Build					
Intersection	**Approach**	**Demand (vehicles)**	**LOS**	**Delay (s)**	**v/c**	**50th % Queue (feet)**	**95th % Queue (feet)**	**Demand (vehicles)**	**LOS**	**Delay (s)**	**v/c**	**50th % Queue (feet)**	**95th % Queue (feet)**	**Demand (vehicles)**	**LOS**	**Delay (s)**	**v/c**	**50th % Queue (feet)**	**95th % Queue (feet)**
4. Summer Street/L Street at East First Street	East 1st Street EB Left/Thru/Right	130	F	106.1	0.98	75	#220	141	F	161.8	1.15	~93	#246	160	F	299.4	1.49	~132	#298
	East 1st Street WB Left/Thru/Right	400	F	128.2	1.13	~219	#462	442	F	184.4	1.28	~287	#533	459	F	230.7	1.39	~329	#585
	Summer Street NB Left/Thru/Right	745	B	19.4	0.62	135	292	835	C	21.5	0.70	161	347	902	C	23.2	0.75	182	392
	Summer Street SB Left/Thru/Right	545	B	12.9	0.52	57	148	603	B	14.5	0.61	65	168	634	B	15.4	0.65	70	178
	OVERALL	**1,820**	**D**	**49.9**	**0.69**	**-**	**-**	**2,021**	**E**	**68.4**	**0.78**	**-**	**-**	**2,155**	**F**	**90.6**	**0.87**	**-**	**-**
7. L Street at East Broadway	East Broadway EB Left/Thru/Right	220	D	52.4	0.59	95	136	239	E	55.2	0.65	104	147	239	E	55.2	0.65	104	147
	East Broadway WB Left/Thru/Right	240	F	95.2	0.93	227	#396	259	F	115.4	1.02	~254	#441	259	F	108.9	0.99	249	#436
	Summer Street NB Left/Thru/Right	645	C	31.5	0.61	218	276	717	C	34.5	0.70	253	316	784	D	37.7	0.77	286	355
	Summer Street SB Left/Thru/Right	390	D	46.1	0.71	192	240	431	D	54.2	0.83	225	280	464	E	64.6	0.91	253	#333
	OVERALL	**1,495**	**D**	**48.4**	**0.63**	**-**	**-**	**1,646**	**E**	**55.1**	**0.71**	**-**	**-**	**1,746**	**E**	**57.8**	**0.75**	**-**	**-**
11. L Street at East 5th Street	East 5th Street EB Left/Thru/Right	55	D	53.3	0.54	44	75	58	D	54.4	0.56	46	77	58	D	54.4	0.56	46	77
	East 5th Street WB Left/Thru/Right	45	D	38.9	0.21	24	58	48	D	39.3	0.24	26	62	48	D	39.3	0.24	26	62
	L Street NB Left/Thru/Right	565	C	27.8	0.80	321	#543	631	D	36.2	0.89	392	#644	697	D	52.6	0.99	~517	#745

Analysis based on Stantec Program from May 21, 2019

		2017 Existing						2030 No-Build						2030 Build					
Intersection	**Approach**	**Demand (vehicles)**	**LOS**	**Delay (s)**	**v/c**	**50th % Queue (feet)**	**95th % Queue (feet)**	**Demand (vehicles)**	**LOS**	**Delay (s)**	**v/c**	**50th % Queue (feet)**	**95th % Queue (feet)**	**Demand (vehicles)**	**LOS**	**Delay (s)**	**v/c**	**50th % Queue (feet)**	**95th % Queue (feet)**
	L Street SB Left/Thru/Right	295	B	17.4	0.50	143	219	327	B	18.7	0.56	166	252	361	C	20.2	0.61	192	289
	OVERALL	**960**	**C**	**26.8**	**0.57**	**-**	**-**	**1,064**	**C**	**31.9**	**0.63**	**-**	**-**	**1,164**	**D**	**41.5**	**0.69**	**-**	**-**
12. L Street at East 8th Street	East 8th Street EB Left/Thru/Right	45	C	23.5	0.16	19	41	48	C	23.7	0.18	21	44	48	C	23.7	0.18	21	44
	East 8th Street WB Left/Thru/Right	40	C	23.5	0.16	19	30	43	C	23.7	0.17	20	31	43	C	23.7	0.17	20	31
	L Street NB Left/Thru/Right	500	A	9.6	0.53	123	200	561	B	10.7	0.60	147	240	628	B	12.3	0.67	178	294
	L Street SB Left/Thru/Right	205	A	6.6	0.24	39	69	231	A	6.8	0.27	46	79	265	A	7.2	0.31	55	93
	OVERALL	**790**	**B**	**10.8**	**0.43**	**-**	**-**	**883**	**B**	**11.5**	**0.48**	**-**	**-**	**984**	**B**	**12.3**	**0.53**	**-**	**-**
14. L Street at Day Blvd (Pedestrian Signal)	Day Blvd EB Left/Thru	795	A	4.0	0.51	0	175	874	A	4.6	0.57	0	209	940	A	5.1	0.62	0	242
	Day Blvd WB Thru/Right	290	A	2.1	0.14	0	43	311	A	2.1	0.15	0	46	311	A	2.1	0.15	0	46
	OVERALL	**1,085**	**A**	**3.4**	**0.47**	**-**	**-**	**1,184**	**A**	**3.8**	**0.53**	**-**	**-**	**1,251**	**A**	**4.3**	**0.57**	**-**	**-**

= 95th percentile volume exceeds capacity, queue may be longer

~ = Volume exceeds capacity, queue is theoretically infinite

m = Volume for 95th percentile queue is metered by upstream signal

Table C-2 Unsignalized Intersection Capacity Analysis – Morning Peak Hour

		2017 Existing					2030 No-Build					2030 Build				
Intersection	**Approach**	**Demand (vehicles)**	**LOS**	**Delay (s)**	**v/c**	**95th % Queue (feet)**	**Demand (vehicles)**	**LOS**	**Delay (s)**	**v/c**	**95th % Queue (feet)**	**Demand (vehicles)**	**LOS**	**Delay (s)**	**v/c**	**95th % Queue (feet)**
3. Summer Street at Elkins Street	Elkins Street EB	25	C	24.8	0.18	16	27	D	29.2	0.22	20	27	F	87.4	0.51	54
	Elkins Site Driveway WB Left/Thru	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	29	F	54.5	0.66	95
	Elkins Site Driveway WB Right	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	75	F	54.5	0.66	95
5. L Street at East 2nd Street	East 2nd Street EB	40	C	15.5	0.17	15	42	C	17.3	0.20	19	42	C	18.9	0.22	21
	East 2nd Street WB	80	B	14.4	0.19	18	89	C	16.0	0.24	23	89	C	17.6	0.26	26
6. L Street at East 3rd Street	East 3rd Street EB	35	B	14.2	0.10	8	38	C	15.4	0.12	10	38	C	16.6	0.13	11
	East 3rd Street WB	50	B	14.4	0.16	14	53	C	15.7	0.19	17	53	C	17.1	0.21	20
8. East 1st Street at K Street	K Street NB Left	120	D	26.6	0.51	69	128	D	32.7	0.59	89	128	E	37.6	0.64	100
	K Street NB Thru/Right	35	B	11.1	0.08	6	38	B	11.3	0.09	7	38	B	11.7	0.09	7
	K Street NB Overall	**155**	**C**	**23.1**	**0.51**	**69**	**166**	**D**	**27.9**	**0.59**	**89**	**166**	**D**	**31.7**	**0.64**	**100**
	K Street SB	60	B	12.3	0.20	18	64	B	12.7	0.22	20	64	B	13.1	0.22	21
9. East 1st Street at M Street/ Site Driveway	M Street NB	100	C	16.4	0.31	33	109	C	18.4	0.37	42	109	D	27.0	0.49	65
	M Street Site Driveway SB	0	n/a	n/a	n/a	n/a	0	n/a	n/a	n/a	n/a	19	B	11.1	0.03	3
10. East 1st Street at West 1st Street/ Pappas Way	West 1st Street NB	135	F	114.8	0.99	203	144	F	210.2	1.25	283	154	F	240.6	1.33	315
	Pappas Way SB	185	F	177.5	1.18	278	203	F	351.3	1.59	403	203	F	428.8	1.76	436
13. L Street at Columbia Road	Columbia Road EB Left/Thru/Right	10	B	12.1	0.02	1	10	B	12.8	0.02	2	10	B	13.9	0.02	2
	Columbia Road WB Left/Thru/Right	25	C	15.0	0.07	5	26	C	16.4	0.08	6	26	C	18.6	0.09	8

Table C-3 Signalized Intersection Capacity Analysis – Evening Peak Hour

		2017 Existing						2030 No-Build						2030 Build					
Intersection	Approach	Demand (vehicles)	LOS	Delay (s)	v/c	50th % Queue (feet)	95th % Queue (feet)	Demand (vehicles)	LOS	Delay (s)	v/c	50th % Queue (feet)	95th % Queue (feet)	Demand (vehicles)	LOS	Delay (s)	v/c	50th % Queue (feet)	95th % Queue (feet)
1. Summer Street at Drydock Ave/Pappas Way	Pappas Way EB Left/Thru/Right	115	C	28.7	0.49	78	#163	125	D	55.0	0.81	~113	#222	120	D	42.9	0.73	~101	#207
	Drydock Avenue WB Left/Thru	305	D	52.9	0.88	~283	#455	403	F	136.8	1.17	~427	#618	403	F	134.4	1.17	~427	#617
	Drydock Avenue WB Right	245	B	16.5	0.17	0	54	328	B	17.0	0.23	0	60	318	B	17.0	0.22	0	60
	Summer Street NB Left	10	C	33.9	0.18	5	22	11	C	34.7	0.19	6	23	11	C	34.7	0.19	6	23
	Summer Street NB Thru/Right	725	E	62.0	0.97	254	#375	792	F	87.6	1.07	~291	#430	959	F	178.3	1.30	~438	#570
	Summer Street SB Left	55	C	22.9	0.29	22	47	93	C	24.5	0.48	38	72	93	C	25.2	0.48	38	72
	Summer Street SB Thru/Right	1,125	D	49.2	0.98	370	#524	1,203	E	68.4	1.05	~423	#585	1,290	F	94.7	1.12	~515	#654
	OVERALL	**2,580**	**D**	**48.6**	**0.83**	**-**	**-**	**2,955**	**E**	**75.2**	**0.98**	**-**	**-**	**3,194**	**F**	**113.1**	**1.04**	**-**	**-**
2. Summer Street at Dedicated Freight Corridor	Fed Ex Driveway EB Left/Thru/Right	20	C	33.7	0.21	9	27	26	C	34.3	0.02	0	0	26	C	34.3	0.02	0	0
	DFC WB Left/Thru	15	C	33.5	0.16	6	22	16	D	35.0	0.18	7	25	16	D	35.0	0.18	7	25
	DFC WB Right	10	C	31.9	0.01	0	3	10	C	33.3	0.01	0	4	10	C	33.3	0.01	0	4
	Summer Street NB Left	0	-	-	-	-	-	5	A	3.6	0.02	1	4	5	A	3.9	0.03	1	4
	Summer Street NB Thru/Right	710	A	4.7	0.36	41	192	775	A	4.6	0.39	46	209	942	A	5.1	0.47	62	274
	Summer Street SB Left	0	-	-	-	-	-	0	-	-	-	-	-	0	-	-	-	-	-
	Summer Street SB Thru/Right	1,120	A	4.0	0.51	81	258	1,262	A	7.4	0.63	100	441	1,349	A	8.1	0.68	113	#528
	OVERALL	**1,875**	**A**	**5.0**	**0.52**	**-**	**-**	**2,094**	**A**	**7.0**	**0.58**	**-**	**-**	**2,348**	**A**	**7.4**	**0.62**	**-**	**-**

		2017 Existing						2030 No-Build						2030 Build					
Intersection	**Approach**	**Demand (vehicles)**	**LOS**	**Delay (s)**	**v/c**	**50th % Queue (feet)**	**95th % Queue (feet)**	**Demand (vehicles)**	**LOS**	**Delay (s)**	**v/c**	**50th % Queue (feet)**	**95th % Queue (feet)**	**Demand (vehicles)**	**LOS**	**Delay (s)**	**v/c**	**50th % Queue (feet)**	**95th % Queue (feet)**
4. Summer Street/L Street at East First Street	East 1st Street EB Left/Thru/Right	190	E	64.1	0.86	137	#250	205	E	63.8	0.86	152	#284	219	F	99.1	1.00	~186	#326
	East 1st Street WB Left/Thru/Right	210	D	42.2	0.62	95	169	227	D	41.8	0.63	110	#191	257	E	78.3	0.94	168	#315
	Summer Street NB Left/Thru/Right	550	B	17.3	0.49	157	206	600	C	20.7	0.60	183	241	636	C	22.2	0.66	202	266
	Summer Street SB Left/Thru/Right	1,110	E	57.4	1.04	~415	#640	1,235	F	130.5	1.22	~613	#786	1,310	F	169.9	1.31	~716	#855
	OVERALL	**2,060**	**D**	**45.6**	**0.89**	**-**	**-**	**2,267**	**F**	**85.8**	**1.01**	**-**	**-**	**2,422**	**F**	**114.1**	**1.10**	**-**	**-**
7. L Street at East Broadway	East Broadway EB Left/Thru/Right	235	D	46.8	0.50	103	144	250	D	48.4	0.56	111	153	250	D	48.4	0.56	111	153
	East Broadway WB Left/Thru/Right	195	E	59.3	0.66	190	278	210	E	62.9	0.72	209	#305	210	E	62.9	0.72	209	#305
	L Street NB Left/Thru/Right	550	C	32.0	0.68	202	240	599	D	36.2	0.77	226	266	635	D	40.7	0.83	244	286
	L Street SB Left/Thru/Right	755	F	117.8	1.13	~467	#600	837	F	190.6	1.30	~570	#704	914	F	246.4	1.43	~656	#794
	OVERALL	**1,735**	**E**	**73.1**	**0.77**	**-**	**-**	**1,896**	**F**	**106.5**	**0.87**	**-**	**-**	**2,009**	**F**	**134.2**	**0.94**	**-**	**-**
11. L Street at East 5th Street	East 5th Street EB Left/Thru/Right	35	D	39.7	0.24	26	53	37	D	40.3	0.26	27	55	37	D	40.3	0.26	27	55
	East 5th Street WB Left/Thru/Right	65	D	44.1	0.40	35	33	70	D	45.4	0.44	39	35	70	D	45.4	0.44	39	35
	L Street NB Left/Thru/Right	530	C	26.2	0.77	299	#509	576	C	30.9	0.84	346	#582	612	D	36.3	0.89	388	#639
	L Street SB Left/Thru/Right	525	C	24.5	0.74	279	#451	582	C	29.2	0.82	333	#562	659	D	40.9	0.93	419	#678
	OVERALL	**1,155**	**C**	**27.7**	**0.53**	**-**	**-**	**1,265**	**C**	**31.9**	**0.58**	**-**	**-**	**1,378**	**D**	**39.3**	**0.63**	**-**	**-**

Analysis based on Stantec Program from May 21, 2019

		2017 Existing						2030 No-Build						2030 Build					
Intersection	**Approach**	**Demand (vehicles)**	**LOS**	**Delay (s)**	**v/c**	**50th % Queue (feet)**	**95th % Queue (feet)**	**Demand (vehicles)**	**LOS**	**Delay (s)**	**v/c**	**50th % Queue (feet)**	**95th % Queue (feet)**	**Demand (vehicles)**	**LOS**	**Delay (s)**	**v/c**	**50th % Queue (feet)**	**95th % Queue (feet)**
12. L Street at East 8th Street	East 8th Street EB Left/Thru/Right	60	C	23.4	0.16	19	49	64	C	23.6	0.17	21	52	64	C	23.6	0.17	21	52
	East 8th Street WB Left/Thru/Right	30	C	22.3	0.07	8	29	32	C	22.3	0.07	9	31	32	C	22.3	0.07	9	31
	L Street NB Left/Thru/Right	475	A	9.9	0.55	127	194	518	B	10.8	0.60	146	223	553	B	11.6	0.64	163	250
	L Street SB Left/Thru/Right	440	A	9.3	0.50	109	178	491	B	10.2	0.56	128	211	568	B	12.0	0.65	163	273
	OVERALL	**1,005**	**B**	**10.8**	**0.43**	**-**	**-**	**1,105**	**B**	**11.6**	**0.47**	**-**	**-**	**1,217**	**B**	**12.7**	**0.51**	**-**	**-**
14. L Street at Day Blvd (Pedestrian Signal)	Day Blvd EB Left/Thru	825	A	3.8	0.48	0	178	891	A	4.1	0.53	0	207	927	A	4.4	0.55	0	224
	Day Blvd WB Thru/Right	360	A	2.1	0.13	0	54	384	A	2.1	0.14	0	58	384	A	2.1	0.14	0	58
	OVERALL	**1,185**	**A**	**3.2**	**0.44**	**-**	**-**	**1,275**	**A**	**3.5**	**0.48**	**-**	**-**	**1,311**	**A**	**3.7**	**0.51**	**-**	**-**

= 95th percentile volume exceeds capacity, queue may be longer
~ = Volume exceeds capacity, queue is theoretically infinite
m = Volume for 95th percentile queue is metered by upstream signal

Analysis based on Stantec Program from May 21, 2019

Table C-4 Unsignalized Intersection Capacity Analysis – Evening Peak Hour

		2017 Existing					2030 No-Build					2030 Build				
Intersection	**Approach**	**Demand (vehicles)**	**LOS**	**Delay (s)**	**v/c**	**95th % Queue (feet)**	**Demand (vehicles)**	**LOS**	**Delay (s)**	**v/c**	**95th % Queue (feet)**	**Demand (vehicles)**	**LOS**	**Delay (s)**	**v/c**	**95th % Queue (feet)**
3. Summer Street at Elkins Street	Elkins Street EB	25	D	26.0	0.18	16	27	D	25.0	0.19	17	27	F	54.8	0.37	38
	Elkins Site Driveway WB Left/Thru	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	77	C	17.5	0.40	49
	Elkins Site Driveway WB Right	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	169	C	17.5	0.40	49
5. L Street at East 2nd Street	East 2nd Street EB	20	C	18.3	0.13	11	22	C	21.9	0.17	15	22	D	25.8	0.20	19
	East 2nd Street WB	20	C	16.7	0.07	6	21	C	19.7	0.09	8	21	C	22.7	0.11	9
6. L Street at East 3rd Street	East 3rd Street EB	45	C	20.5	0.22	21	48	D	25.3	0.29	29	48	D	30.8	0.34	36
	East 3rd Street WB	25	C	15.0	0.10	8	27	C	16.8	0.12	10	27	C	18.6	0.14	12
8. East 1st Street at K Street	K Street NB Left	45	C	15.3	0.14	12	48	C	16.4	0.16	14	48	C	17.4	0.17	15
	K Street NB Thru/Right	25	B	11.5	0.05	4	27	B	11.9	0.06	5	27	B	12.3	0.06	5
	K Street NB Overall	**70**	**B**	**14.0**	**0.14**	**12**	**75**	**B**	**14.7**	**0.16**	**14**	**75**	**C**	**15.5**	**0.17**	**15**
	K Street SB	55	B	10.5	0.11	9	58	B	10.8	0.12	10	58	B	11.1	0.12	11
9. East 1st Street at M Street/ Site Driveway	M Street NB	55	C	17.2	0.19	17	58	C	18.7	0.22	20	58	C	24.8	0.28	28
	M Street Site Driveway SB	0	n/a	n/a	n/a	n/a	0	n/a	n/a	n/a	n/a	31	B	11.3	0.06	4
10. East 1st Street at West 1st Street/ Pappas Way	West 1st Street NB	80	C	20.3	0.28	28	86	C	23.0	0.34	36	93	C	24.3	0.37	41
	Pappas Way SB	390	F	209.1	1.35	526	445	F	367.3	1.71	768	445	F	442.9	1.88	833
13. L Street at Columbia Road	Columbia Road EB Left/Thru/Right	10	C	20.6	0.04	3	10	C	23.3	0.05	4	10	D	30.1	0.07	5
	Columbia Road WB Left/Thru/Right	30	C	16.0	0.09	7	32	C	17.5	0.11	9	32	C	20.9	0.13	11

MUTCD 2000 (Millennium Edition)

TRAFFIC SIGNAL WARRANT ANALYSIS (VOLUME BASED)

Intersection: Summer Street @ Elkins Street

Major Street Direction: Northbound-Southbound

Year: 2017 **Condition:** Existing

Operating speed on major roadway: 35 mph

Number of approaches: 3

Warrant 1 EIGHT-HOUR VEHICULAR VOLUME		Required approach volumes: Minimum*	Adjusted Minimum**
Warrant 1A	MINIMUM VEHICULAR VOLUME (8 hours of day)		
	Major Street : 2 Lane(s) on each approach	600	600
	Minor Street : 1 Lane(s) on each approach	150	150
Warrant 1B	INTERRUPTION OF CONTINUOUS TRAFFIC (8 hours of day)		
	Major Street : 2 Lane(s) on each approach	900	900
	Minor Street : 1 Lane(s) on each approach	75	75
	80 PERCENT SATISFACTION OF WARRANT 1A **AND** WARRANT 1B	Warrant 1A	Warrant 1B
	Major Street : 2 Lane(s) on each approach	480	720
	Minor Street : 1 Lane(s) on each approach	120	60

Warrant 2 FOUR HOUR VEHICULAR VOLUME

Major Street : 2 Lane(s) on each approach — If "verify" indicated, see Figure 4C-1 or 4C-2.

Minor Street : 1 Lane(s) on each approach — 25 = accuracy of regression equations

Warrant 3 PEAK HOUR VOLUME

Major Street : 2 Lane(s) on each approach — If "verify" indicated, see Figure 4C-3 or 4C-4.

Minor Street : 1 Lane(s) on each approach — 25 = accuracy of regression equations

Hour	Entering Vol. Minor Road+	Entering Vol. on Major Road: Northbound	Southbound	Tot. Ent. Vol. On Major Rd	Meets the following volume-based warrants? 1A	1B	80%(1A&1B)	2	3
	Proj. Driveway								
6:00 - 7:00 AM	14	871	368	1239	No	No	No	No	No
7:00 - 8:00 AM	19	1037	510	1547	No	No	No	No	No
8:00 - 9:00 AM	16	1017	506	1523	No	No	No	No	No
9:00 - 10:00 AM	14	785	532	1317	No	No	No	No	No
10:00 - 11:00 AM	21	603	502	1105	No	No	No	No	No
11:00 - 12:00 AM	24	547	527	1074	No	No	No	No	No
12:00 - 1:00 PM	23	541	550	1091	No	No	No	No	No
1:00 - 2:00 PM	35	517	579	1096	No	No	No	No	No
2:00 - 3:00 PM	23	600	788	1388	No	No	No	No	No
3:00 - 4:00 PM	28	581	839	1420	No	No	No	No	No
4:00 - 5:00 PM	35	720	910	1630	No	No	No	No	No
5:00 - 6:00 PM	34	684	1005	1689	No	No	No	No	No
6:00 - 7:00 PM				0	No	No	No	No	No
					No	**No**	**No**	**No**	**No**
				Warrants Met?	**1**			**2**	**3**
					NO			**No**	**No**

*From the criteria described for the warrant in the MUTCD.

**If the operating speed is higher than 40mph then the volumes can be adjusted to 70%. (If no adjusted minimum, the minimum from the previous column is shown)

+If more than one approach, report the approach that has the higher volume.

NON-VOLUME-BASED WARRANTS

Warrant 4, Minimum Pedestrian Volume: No

Peak Four Hour Pedestrian Volumes: 46

(non-concurrent) 33

85

112

Warrant 5, School Crossing:

See MUTCD for details.

Warrant 6, Coordinated Signal System:

See MUTCD for details.

Warrant 7, Crash Experience: No

# of accidents "correctable by signalization" occuring in the last 12 months:

Warrant 8, Roadway Network:

See MUTCD for details.

Source: *Manual on Uniform Traffic Control Devices* (MUTCD); Millenium Edition, December 2000

last updated: 12/12/01

MUTCD 2000 (Millennium Edition)

TRAFFIC SIGNAL WARRANT ANALYSIS (VOLUME BASED)

Intersection: Summer Street @ Elkins Street

Major Street Direction: Northbound-Southbound

Year: 2030 **Condition:** Full Build

Operating speed on major roadway: 25 mph

Number of approaches: 4

Warrant 1	EIGHT-HOUR VEHICULAR VOLUME	Required approach volumes: Minimum*	Adjusted Minimum**
Warrant 1A	MINIMUM VEHICULAR VOLUME (8 hours of day)		
	Major Street : 2 Lane(s) on each approach	600	600
	Minor Street : 1 Lane(s) on each approach	150	150
Warrant 1B	INTERRUPTION OF CONTINUOUS TRAFFIC (8 hours of day)		
	Major Street : 2 Lane(s) on each approach	900	900
	Minor Street : 1 Lane(s) on each approach	75	75
	80 PERCENT SATISFACTION OF WARRANT 1A **AND** WARRANT 1B	Warrant 1A	Warrant 1B
	Major Street : 2 Lane(s) on each approach	480	720
	Minor Street : 1 Lane(s) on each approach	120	60

Warrant 2	FOUR HOUR VEHICULAR VOLUME	
	Major Street : 2 Lane(s) on each approach	If "verify" indicated, see Figure 4C-1 or 4C-2.
	Minor Street : 1 Lane(s) on each approach	25 = accuracy of regression equations

Warrant 3	PEAK HOUR VOLUME	
	Major Street : 2 Lane(s) on each approach	If "verify" indicated, see Figure 4C-3 or 4C-4.
	Minor Street : 1 Lane(s) on each approach	25 = accuracy of regression equations

Hour	Entering Vol. Minor Road+	Entering Vol. on Major Road: Northbound	Southbound	Tot. Ent. Vol. On Major Rd	Meets the following volume-based warrants? 1A	1B	80%(1A&1B)	2	3
	Proj. Driveway								
6:00 - 7:00 AM	97	952	497	1449	No	Yes	No	Verify	No
7:00 - 8:00 AM	123	1137	672	1809	No	Yes	Yes	Yes	Verify
8:00 - 9:00 AM	119	1115	666	1781	No	Yes	No	Yes	Yes
9:00 - 10:00 AM	103	867	674	1540	No	Yes	No	Verify	No
10:00 - 11:00 AM	95	669	623	1292	No	Yes	No	Verify	No
11:00 - 12:00 AM	96	610	646	1256	No	Yes	No	Verify	No
12:00 - 1:00 PM	96	605	671	1276	No	Yes	No	Verify	No
1:00 - 2:00 PM	109	580	702	1282	No	Yes	No	Verify	No
2:00 - 3:00 PM	116	678	945	1623	No	Yes	No	Yes	Verify
3:00 - 4:00 PM	124	659	1001	1661	No	Yes	Yes	Yes	Verify
4:00 - 5:00 PM	145	812	1094	1906	No	Yes	Yes	Yes	Yes
5:00 - 6:00 PM	148	777	1198	1975	No	Yes	Yes	Yes	Yes
6:00 - 7:00 PM				0	No	No	No	No	No
					No	**Yes**	**No**	**Yes**	**Yes**
				Warrants Met?	**1**			**2**	**3**
					Yes			**Yes**	**Yes**

*From the criteria described for the warrant in the MUTCD.

**If the operating speed is higher than 40mph then the volumes can be adjusted to 70%. (If no adjusted minimum, the minimum from the previous column is shown)

+If more than one approach, report the approach that has the higher volume.

NON-VOLUME-BASED WARRANTS

Warrant 4, Minimum Pedestrian Volume: No

Peak Four Hour Pedestrian Volumes: 46

(non-concurrent) 33

85

112

Warrant 5, School Crossing:

See MUTCD for details.

Warrant 6, Coordinated Signal System:

See MUTCD for details.

Warrant 7, Crash Experience: No

# of accidents "correctable by signalization" occuring in the last 12 months:

Warrant 8, Roadway Network:

See MUTCD for details.

Source: *Manual on Uniform Traffic Control Devices* (MUTCD); Millenium Edition, December 2000

last updated: 12/12/01

MUTCD 2000 (Millennium Edition)

TRAFFIC SIGNAL WARRANT ANALYSIS (VOLUME BASED)

Intersection: E 1st Street @ M Street

Major Street Direction: Eastbound-Westbound

Year: 2017 **Condition:** Existing

Operating speed on major roadway: 35 mph

Number of approaches: 3

		Required approach volumes	
			Adjusted
Warrant 1	**EIGHT-HOUR VEHICULAR VOLUME**	Minimum*	Minimum**
Warrant 1A	MINIMUM VEHICULAR VOLUME (8 hours of day)		
	Major Street : 1 Lane(s) on each approach	500	500
	Minor Street : 1 Lane(s) on each approach	150	150
Warrant 1B	INTERRUPTION OF CONTINUOUS TRAFFIC (8 hours of day)		
	Major Street : 1 Lane(s) on each approach	750	750
	Minor Street : 1 Lane(s) on each approach	75	75
	80 PERCENT SATISFACTION OF WARRANT 1A **AND** WARRANT 1B	Warrant 1A	Warrant 1B
	Major Street : 1 Lane(s) on each approach	400	600
	Minor Street : 1 Lane(s) on each approach	120	60

Warrant 2 **FOUR HOUR VEHICULAR VOLUME**

Major Street : 1 Lane(s) on each approach — If "verify" indicated, see Figure 4C-1 or 4C-2.

Minor Street : 1 Lane(s) on each approach — 25 = accuracy of regression equations

Warrant 3 **PEAK HOUR VOLUME**

Major Street : 1 Lane(s) on each approach — If "verify" indicated, see Figure 4C-3 or 4C-4.

Minor Street : 1 Lane(s) on each approach — 25 = accuracy of regression equations

Hour	Entering Vol. Minor Road+	Entering Vol. on Major Road		Tot. Ent. Vol. On Major Rd	Meets the following volume-based warrants?				
		Eastbound	Westbound		1A	1B	80%(1A&1B)	2	3
	Proj. Driveway								
6:00 - 7:00 AM	59	169	259	428	No	No	No	No	No
7:00 - 8:00 AM	124	228	468	696	No	No	Yes	No	No
8:00 - 9:00 AM	97	215	460	675	No	No	No	No	No
9:00 - 10:00 AM	29	200	343	543	No	No	No	No	No
10:00 - 11:00 AM	33	227	276	503	No	No	No	No	No
11:00 - 12:00 AM	38	261	318	579	No	No	No	No	No
12:00 - 1:00 PM	38	274	308	582	No	No	No	No	No
1:00 - 2:00 PM	32	274	338	612	No	No	No	No	No
2:00 - 3:00 PM	39	275	338	613	No	No	No	No	No
3:00 - 4:00 PM	38	293	315	608	No	No	No	No	No
4:00 - 5:00 PM	50	273	249	522	No	No	No	No	No
5:00 - 6:00 PM	49	389	250	639	No	No	No	No	No
6:00 - 7:00 PM				0	No	No	No	No	No
					No	**No**	**No**	**No**	**No**
				Warrants Met?	**1**			**2**	**3**
					NO			**No**	**No**

*From the criteria described for the warrant in the MUTCD.

**If the operating speed is higher than 40mph then the volumes can be adjusted to 70%. (If no adjusted minimum, the minimum from the previous column is shown)

+If more than one approach, report the approach that has the higher volume.

NON-VOLUME-BASED WARRANTS

Warrant 4, Minimum Pedestrian Volume: No

Peak Four Hour Pedestrian Volumes: 46

(non-concurrent) 33

85

112

Warrant 5, School Crossing:

See MUTCD for details.

Warrant 6, Coordinated Signal System:

See MUTCD for details.

Warrant 7, Crash Experience: No

# of accidents "correctable by signalization" occuring in the last 12 months:

Warrant 8, Roadway Network:

See MUTCD for details.

Source: *Manual on Uniform Traffic Control Devices* (MUTCD); Millenium Edition, December 2000

last updated: 12/12/01

MUTCD 2000 (Millennium Edition)

TRAFFIC SIGNAL WARRANT ANALYSIS (VOLUME BASED)

Intersection: E 1st Street @ M Street

Major Street Direction: 2

Year: 2030 **Condition:** Full Build

Operating speed on major roadway: 35 mph

Number of approaches: 4

		Required approach volumes	
Warrant 1	**EIGHT-HOUR VEHICULAR VOLUME**	Minimum*	Adjusted Minimum**
Warrant 1A	MINIMUM VEHICULAR VOLUME (8 hours of day)		
	Major Street : 1 Lane(s) on each approach	500	500
	Minor Street : 1 Lane(s) on each approach	150	150
Warrant 1B	INTERRUPTION OF CONTINUOUS TRAFFIC (8 hours of day)		
	Major Street : 1 Lane(s) on each approach	750	750
	Minor Street : 1 Lane(s) on each approach	75	75
	80 PERCENT SATISFACTION OF WARRANT 1A **AND** WARRANT 1B	Warrant 1A	Warrant 1B
	Major Street : 1 Lane(s) on each approach	400	600
	Minor Street : 1 Lane(s) on each approach	120	60

Warrant 2 **FOUR HOUR VEHICULAR VOLUME**

Major Street : 1 Lane(s) on each approach — If "verify" indicated, see Figure 4C-1 or 4C-2.

Minor Street : 1 Lane(s) on each approach — 25 = accuracy of regression equations

Warrant 3 **PEAK HOUR VOLUME**

Major Street : 1 Lane(s) on each approach — If "verify" indicated, see Figure 4C-3 or 4C-4.

Minor Street : 1 Lane(s) on each approach — 25 = accuracy of regression equations

Hour	Entering Vol. Minor Road+	Entering Vol. on Major Road Eastbound	Entering Vol. on Major Road Westbound	Tot. Ent. Vol. On Major Rd	Meets the following volume-based warrants? 1A	1B	80%(1A&1B)	2	3
	Proj. Driveway								
6:00 - 7:00 AM	76	175	284	459	No	No	No	No	No
7:00 - 8:00 AM	124	236	510	746	No	No	Yes	No	No
8:00 - 9:00 AM	116	215	484	699	No	No	No	No	No
9:00 - 10:00 AM	97	207	375	582	No	No	No	No	No
10:00 - 11:00 AM	90	235	304	539	No	No	No	No	No
11:00 - 12:00 AM	103	270	350	620	No	No	No	No	No
12:00 - 1:00 PM	104	284	340	624	No	No	No	No	No
1:00 - 2:00 PM	109	284	372	656	No	No	No	No	No
2:00 - 3:00 PM	109	285	372	657	No	No	No	No	No
3:00 - 4:00 PM	108	303	348	652	No	No	No	No	No
4:00 - 5:00 PM	93	283	277	559	No	No	No	No	No
5:00 - 6:00 PM	114	403	282	685	No	No	No	No	No
6:00 - 7:00 PM				0	No	No	No	No	No
					No	**No**	**No**	**No**	**No**
				Warrants Met?	**1**			**2**	**3**
					NO			**No**	**No**

*From the criteria described for the warrant in the MUTCD.

**If the operating speed is higher than 40mph then the volumes can be adjusted to 70%. (If no adjusted minimum, the minimum from the previous column is shown)

+If more than one approach, report the approach that has the higher volume.

NON-VOLUME-BASED WARRANTS

Warrant 4, Minimum Pedestrian Volume: No

Peak Four Hour Pedestrian Volumes: 46

(non-concurrent) 33

85

112

Warrant 5, School Crossing:

See MUTCD for details.

Warrant 6, Coordinated Signal System:

See MUTCD for details.

Warrant 7, Crash Experience: No

# of accidents "correctable by signalization" occuring in the last 12 months:

Warrant 8, Roadway Network:

See MUTCD for details.

Source: *Manual on Uniform Traffic Control Devices* (MUTCD); Millenium Edition, December 2000

last updated: 12/12/01