

June 20, 2022

Mr. James Arthur Jemison
Chief of Planning, City of Boston
Director, Boston Planning & Development Agency
City Hall
Boston, MA 02201

Re: Draft Project Impact Report, 990 American Legion Highway

Dear Chief of Planning and BPDA Director Jemison:

Residents in the City of Boston write as the Crane Ledge Woods Coalition, representing organizations from the inland environmental justice neighborhoods surrounding Crane Ledge Woods, over 50 supporting organizations City-wide - including Mass Audubon and Boston Building Trades Council - and +4,000 individual supporting residents and families.

The Coalition respectfully recommends and requests that you advance Mayor Wu's transformative vision for an equitable, sustainable Boston by taking the following steps for Crane Ledge Woods and the proposed development at 990 American Legion Highway:

1. Find that a Final Project Impact Report is required to adequately evaluate the project;
2. Take all necessary steps to evaluate the full conservation alternative for Crane Ledge Woods and its benefits and impacts, starting by completing an independent appraisal of the Crane Ledge Woods parcels, as a BPDA and City of Boston Planning priority.

CLWC believes that these two steps will show that impacts of the proposed 990 ALH project are far greater than its purported benefits, that staff should recommend the project be denied if advanced to the BPDA Board, and that BPDA and the City should proceed with full conservation based on fair compensation to the owner and all parties.

These steps would represent fulfillment of Mayor Wu's stated commitments to Boston voters, the BPDA's own stated policies, and constitute meaningful action on the urgent issues of environmental justice, climate change, and sustainable development with a focus on truly affordable housing and commitment to rights of workers and their families.

CLWC acknowledges the time and efforts of all City officials and staff in review and thank you, the Agency and all City staff and officials for your thoughtful consideration.



Lokita Jackson
for Crane Ledge Woods Coalition

**CRANE LEDGE WOODS COALITION TECHNICAL COMMENT LETTER II
ON 990 AMERICAN LEGION HIGHWAY**

Crane Ledge Woods Coalition Mattapan, Hyde Park, and Roslindale membership:

Belnel Family Neighborhood Association
Clarendon Hills Condo Association
East River Street Neighborhood Association
Greater Mattapan Neighborhood Council
Hyde Park Historical Society
Hyde Park Neighborhood Association
MassPaths
Mt. Hope Canterbury Neighborhood Association
Rosebery-Ruskindale Road Neighborhood Association
Southwest Boston CDC
West Fairmount Hill Community Group

Together With

Boston Building Trades Council, Mass Audubon, and 50+ Organizations

And

Over 4,000 individuals and families in Mattapan, Hyde Park, Roslindale, and City-wide.

Crane Ledge Woods Coalition
P.O. Box 366158
Hyde Park, MA 02136

tel: 617.690.7848
email: craneledgeinfo@gmail.com
webpage: www.savecraneledgewoods.org

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CRANE LEDGE WOODS COALITION TECHNICAL COMMENT LETTER II ON 990 AMERICAN LEGION HIGHWAY

Crane Ledge Woods Coalition

A neighborhood-based City-wide coalition for positive change!

Crane Ledge Woods is a 24-acre woodland – the largest unprotected urban wild remaining in Boston – bordering environmental justice residential neighborhoods in Hyde Park, Roslindale and Mattapan.

This beautiful urban forest is owned by Jubilee Christian Church. We respect the church's mission, its private property rights and contractual obligations, and the right to realize the value of its property to advance its mission.

We are advocating for full conservation of the entire site, and doing so through reaching a resolution with the owner, the City, and all parties.



Mayor Michelle Wu:

“In Boston, when we talk about bold, systemic changes, the barriers are never about resources. The barrier is always our political will.” June 20, 2021.

“You know, I think what’s happened is the energy on the ground is always ahead of what the conventional political wisdom says.” December 2021

**CRANE LEDGE WOODS COALITION TECHNICAL COMMENT LETTER II
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**CRANE LEDGE WOODS COALITION TECHNICAL COMMENT LETTER II
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Coalition Statement of Values and Vision

Crane Ledge Woods is a 24-acre woodland – the largest unprotected urban wild remaining in Boston – bordering Hyde Park, Roslindale and Mattapan.

This beautiful urban forest is owned by Jubilee Christian Church. We respect the church's mission, its private property rights and contractual obligations, and the right to realize the value of its property to advance its mission.

We are advocating for full conservation of the entire site, and doing so through reaching a resolution with the owner, the City, and all parties.

The Coalition supports Boston's workers and their families, and does not support developers who fail to respect and cooperate with our labor brothers and sisters in project agreements.

The Coalition supports ALL Boston residents and neighborhoods in shared efforts to address priorities of heat island, extreme weather, park equity, truly affordable housing, supporting Brown and Black owned businesses, and union jobs.

The Coalition supports efforts to unite Boston residents and neighborhoods, affirming that protection of one neighborhood helps advance all neighborhoods, and creating needed housing can be achieved without destruction of natural areas like Crane Ledge Woods.

As of June 2022 the project has not received any City approvals, and so we are early in the process, enabling the Wu Administration and BPDA to address Boston's Green New Deal priorities through full conservation of Crane Ledge Woods.

More than sufficient funds exist in Mayor Wu's FY23 City of Boston capital budget, together with further sources including the Community Preservation Act, state and federal funds, and BPDA Demonstration Project resources, for full conservation of Crane Ledge Woods and to advance similar priorities in all Boston neighborhoods.

Full conservation of Crane Ledge Woods is an investment in green infrastructure to protect residents in the City's inland environmental justice neighborhoods and to provide park and green space access for all.

To advance Environmental Justice, the city must make climate adaptation equitable. Doing so requires the political will to acquire green infrastructure for inland climate resilience.

We envision a transformative outcome: protection of nature, respect for working people, and needed, truly affordable housing directed to suitable sites at walkable areas near clean, safe, reliable public transit.

With this positive change, residents, neighborhood groups, and all people interested may have a real role in decisions shaping the future of our City.

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Community Location and Site Photographs



CRANE LEDGE WOODS COALITION TECHNICAL COMMENT LETTER II ON 990 AMERICAN LEGION HIGHWAY



Crane Ledge Woods is at the nexus of three environmental justice neighborhoods



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Organizations in Support of Saving Crane Ledge Woods

350 Mass, Boston Node
Alternatives for Community and Environment (ACE)
Back Bay Green
Belnel Family Neighborhood Association
Boston Clean Energy Coalition
Boston Climate Action Network
Boston Food Forest Coalition
Boston Ujima Project
BTA Green, Boston Trinity Academy
Charles River Watershed Association
City Life/Vida Urbana
Clarendon Hills Condominium Association
Codman Square Neighborhood Development Corporation
Dell Rock Neighborhood Association
Dorchester Bay Economic Development Corporation
Environmental Justice Team of First Parish Cambridge UU
East River St. Neighborhood Association
Epstein & August, LLP
Extinction Rebellion Boston
First Parish in Brookline
Friends of Melnea Cass Boulevard
Friends of the Hyde Park Library
Greater Boston Physicians for Social Responsibility
Greater Mattapan Neighborhood Council (GMNC)
Grew Park Neighborhood Association
Hyde Park Central River Neighborhood Group
Hyde Park Neighborhood Association
Keep Hyde Park Beautiful
Keep the Woods
Learning Lab for Resiliency™
MassPaths
Mass Audubon
Mt. Hope Canterbury Neighborhood Assoc
Muddy Water Initiative
Neat-n-Green
Neponset River Greenway Council
Neponset River Watershed Association
Old-Growth Forest Network
Quincy Tree Alliance
Regeneration Massachusetts
Resist the Pipeline
RESTORE: The North Woods
Rosebery-Ruskindale Neighborhood Assoc
Roslindale Wetlands Task Force
Save Milton Avenue
Showing Up for Racial Justice Boston
Sierra Club Massachusetts
Southwest Boston CDC
Speak for the Trees, Boston
TecsChange
The Community Church of Boston
The Enviro Show
UU Mass Action
Wendell State Forest Alliance
West Fairmount Hill Community Group

As of: June 20, 2022

**CRANE LEDGE WOODS COALITION TECHNICAL COMMENT LETTER II
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List of Unresolved Project Issues Requiring Final Project Impact Report

- Project does not help advance Mayor Wu's Green New Deal goals for environmental justice, sustainable development, a just transition, and the climate emergency.
- Project will add to already severe disparate, harmful impacts in Boston's inland Environmental Justice neighborhoods: See EJ Site Analysis following.
- Poor company track record in its dealings with Boston workers and their families.
- Project is not Net Zero New Construction.
- Project extensive cutting of Boston's urban forest creates a harmful new heat island.
- Private investor housing model does not reflect priority needs of Boston residents.
- Rent is unaffordable to most individuals and families from surrounding neighborhood.
- Lack of homeownership pathways would perpetuate wealth inequality in this neighborhood of 90% Black and Brown families.
- Immediate area has no walking distance parks as the City's own mapping shows.
- Project is located in NS Neighborhood Shopping District but does not include any actual Neighborhood Shopping, contrary to intent of Hyde Park neighborhood plan.
- Private-car dependent when we seek to encourage density near transit; lack of realistic transportation planning results in significant net increase in dangerous CO2.
- Requires extensive granite-ledge blasting.
- Increases local flooding already severe in residential neighborhoods below property.
- Worsens respiratory illnesses in an area already in the 95-100 percentile statewide.
- Project will destroy needed urban natural habitat, reduce biodiversity, disturb ecosystem balance, and displace wildlife including into nearby residential areas.
- Developer refused to extend comment period for review of highly technical document, even insisting that all comments be submitted on June 20, 2022: Juneteenth holiday Monday. Juneteenth June 19 is a day of special significance for descendants of slaves in the United States and for all Americans.
- These many serious process flaws and project impacts do not offset benefits claimed.
- Mayor Wu and BPDA staff should recommend project be denied if advanced to Board.

CRANE LEDGE WOODS COALITION TECHNICAL COMMENT LETTER II ON 990 AMERICAN LEGION HIGHWAY

Crane Ledge Woods is Within an Environmental Justice Community

The [EPA EJScreen 2.0 online tool](#) creates indices for demographic information and environmental hazards in US census block groups. Crane Ledge Woods is within US census block group 250251404006 (orange area shaded below). The visible adjacent residential streets have the same demographics.



Environmental Justice Indices / State of Massachusetts Percentiles for Block Group

95-100th percentile for particulate matter 2.5, ozone, diesel particulate matter, air toxics cancer risk, air toxics respiratory HI (Hazard Index), lead paint, superfund proximity, and underground storage tanks.

90-95th percentile for the state for traffic proximity and hazardous waste proximity, and in the 80-90th percentile for RMP (Risk Management Plans) facility proximity.

Socioeconomic Indicators:

95-100th percentile for people of color

90-95th percentile for demographic index, unemployment, less than HS education

80-90th percentile for low income, linguistically isolated, under age 5.

Health Disparities:

95-100th percentile when compared to the State of Massachusetts for asthma.

The block group is categorized as medically underserved.

CRANE LEDGE WOODS COALITION TECHNICAL COMMENT LETTER II ON 990 AMERICAN LEGION HIGHWAY

Case Study for Wu Administration and BPDA to Show True Commitment to Equity, Environmental Justice, Public Health, & Inland Climate Resilience

- Heat islands are a rising climate threat facing cities. Mitigating existing heat islands must not come at the cost of creating new ones. The unparalleled loss of tree canopy in Hyde Park impacts immediate residents and neighborhoods across the city.
- Climate Ready Boston sees climate adaptation as key to the city's resilience. However, the plan's coastal focus lacks equity as most Environmental Justice populations are inland.
- Environmental Justice populations are areas where incomes are below 65% of the state's annual median household income, people of color are at least 40% of the population; or 25% or more of households lack English language proficiency.
- Environmental Justice populations face serious gaps in green infrastructure and make up most of City Council District 5 and House District 6th Suffolk.
- Environmental Justice populations have three times the average amount of impervious surface in Massachusetts, making them more likely to experience heat stress and flooding caused by climate change.
- Green infrastructure supports public health with air quality and recreation and mitigates heat stress and flooding, while costing less than grey infrastructure.
- The City of Boston has approximately 175 acres of urban wild; which is less than 1% of Boston's land area. Crane Ledge is the largest unprotected urban wild remaining in Boston and the city's best opportunity for inland climate resilience.
- Protecting Crane Ledge will increase Boston's urban wilds by over 13% and sustain green infrastructure in a census tract that is 90% people of color.
- **To advance Environmental Justice, the city must make climate adaptation equitable. Doing so requires the political will to acquire green infrastructure such as Crane Ledge Woods for inland climate resilience.**

Sources: *Analyze Boston*; *Boston Planning and Development Agency*; *Climate Ready Boston*; *Executive Office of Energy and Environmental Affairs*; *MassGIS (Bureau of Geographic Information)*; *United States Census*

**CRANE LEDGE WOODS COALITION TECHNICAL COMMENT LETTER II
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Crane Ledge Woods: A Place for All to Enjoy



Barbara Hamilton and her granddaughter Izza Smith walked through the Crane Ledge Woods, a 14-acre parcel of woods in Hyde Park. JONATHAN WIGGS/GLOBE STAFF



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Evaluation of the Draft Project Impact Report: Article 80B-5 Large Project Review

Review of the housing development proposed at 990 American Legion Highway proceeds under Article 80 of the City of Boston Zoning Code, and specifically Sec. 80B-5 Large Project Review. Relevant portions of Article 80 and 80-5 are extracted below.

- | | |
|---|--|
| Step 1: Project Notification Form | Issued June 4, 2021 |
| Step 2: Scoping Determination: | Issued November 19, 2021 |
| Step 3: Draft Project Impact Report: | Issued May 6, 2022 |
| Step 4: Preliminary Adequacy Determination: | Due by or before Tuesday, July 5, 2022 |

Preliminary Adequacy Determination due not more than 60 days after receipt of the Draft Project Impact Report. The Preliminary Determination lists DPIR elements satisfying the Scoping Determination, any further steps necessary to satisfy the Scoping Determination, and modification to the Scoping Determination, if any, arising from new information.

Based on the Preliminary Adequacy Determination (PAD):

Step 5a: Listing of Scoping Determination requirements not yet satisfied; AND / OR

Step 5b. Amendment of Scoping Determination, listing any new requirements identified and eliminating initial elements no longer relevant; OR

Step 5c: Preliminary Adequacy Determination finding that future review may be waived, as the Draft PIR meets all Scoping Determination requirements. Effective 19 days after issuance; Waiver if issued would be effective not later than Mon July 25, 2022.

Step 6: Final Project Impact Report (FPIR), addressing unresolved requirements of Scoping Determination, amended requirements, if any, and issues identified in the Preliminary Adequacy Determination. ie FPIR must address issues identified in Step 5a and/or Step 5b.

Step 7: Adequacy Determination. BPDA shall approve, conditionally approve, or disapprove the Final Project Impact Report. If the Agency issues an Adequacy Determination disapproving the FPIR, it shall provide specific reasons for the disapproval.

The Adequacy Determination must be made within 60 days of FPIR being submitted.

Step 8. (OPTIONAL by DEVELOPER). Revision of Final Project Impact Report. If the Adequacy Determination disapproves the Final Project Impact Report, the Applicant shall revise the FPIR before resubmitting it to the Boston Redevelopment Authority.

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**Compendium of Statements & Commitments by Michelle Wu
On Equity, Environmental Justice, and Climate**

<https://www.thenation.com/article/politics/qa-michelle-wu/>

Michelle Wu: Cities Must Lead for the Green New Deal

An interview with the newly elected mayor of Boston about building on the accomplishments of progressive pioneers and shaping a new politics at the municipal level.

By John Nichols

Nation Magazine Interview December 2021: Is the City of Boston itself changing?

Mayor Michelle Wu: You know, I think what's happened is the energy on the ground is always ahead of what the conventional political wisdom says.

MICHELLE WU COURTS CLIMATE JUSTICE ACTIVISTS WITH BOLD "BOSTON GREEN NEW DEAL"

WRITTEN BY JON LAMSON

POSTED JUNE 22, 2021

FILED UNDER: NEWS, NEWS TO US, NEWS+OPINIONS



"In Boston, when we talk about bold, systemic changes, the barriers are never about resources. The barrier is always our political will."

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Wu Committee: “Climate is the issue that will define the next 100 years”

From: **Michelle Wu** <info@michelleforboston.com>
Date: Fri, Apr 22, 2022, 3:18 PM
Subject: Climate is the issue that will define the next 100 years

Happy Earth Day!

The year my son Blaise was born, I remember reading a headline that it had been the hottest year on record. And since then, his seven years on the planet have been the warmest on Earth. Right here in Boston, we feel the effects of our changing weather systems every summer — rising temperatures, erratic flooding, unpredictable storms. Climate justice is critical to Boston’s future.

I’m proud that our administration is hard at work this month and every month to make our city a beacon for climate action and environmental justice. **That’s why today, we released *Heat Resilient Solutions for Boston* — our roadmap to preparing Boston for hotter temperatures, especially our most vulnerable communities.**

Now is the time for urgent climate action. Today I stood in Chinatown’s Auntie Kay & Uncle Frank Chin Park alongside government and community leaders to renew our commitment to addressing chronic high temperatures across Boston’s neighborhoods.

Boston’s Green New Deal must work for every Bostonian. We’re bringing every City department and community group to the table to ensure that we’re doing all we can to meet this moment.

This Earth Day, I’m so honored to have you with us in this work.

In solidarity,



Donate

Paid for and authorized by The Wu Committee

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CRANE LEDGE WOODS COALITION TECHNICAL COMMENT LETTER II ON 990 AMERICAN LEGION HIGHWAY



Michelle Wu 吳弭 ✓
@wutrain

...

Imagine a Mayor & Administration where communities wouldn't have to fight *our own city agencies* to negotiate for the public good & long-term planning.
[#AbolishtheBPDA](#)



Grace Holley @holley · Sep 24, 2020

Wild to sit thru 4386 public meetings on different development proposals around the City over the yrs and watch the same sh*t happen over & over: devs + City present a displacement plan; people protest, explain how they'll be displaced; City still approves* plan. #bospoli [twitter.com/PUEBLO_Eastie/...](https://twitter.com/PUEBLO_Eastie/)

[Show this thread](#)

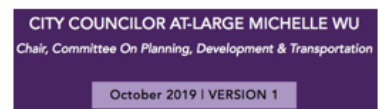
9:11 AM · Sep 25, 2020 · Twitter for iPhone



Neither the residents of Boston nor their elected legislators have direct oversight over development and planning decisions.⁶

A Black Box Approach

Leaving large-scale planning and development policy to a self-funded agency answerable only to the Mayor has allowed well-connected insiders to shape the future of Boston with little transparency or accountability. Neither the residents of Boston nor their elected legislators have direct oversight over development and planning decisions. Accordingly, the public must struggle to understand the deals the BPDA negotiates with developers, how those decisions are made, and whether the commitments made by private entities are upheld.⁴⁴ The expediency that the BPDA offers well-connected developers looking to maximize short-term gains comes at the expense of a broader vision to benefit the city as a whole and future generations.



**CRANE LEDGE WOODS COALITION TECHNICAL COMMENT LETTER II
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Land Acknowledgement

We respectfully acknowledge that Crane Ledge Woods and all of Boston are the traditional territory of the Massachusett Tribe.

We offer our gratitude to the First Nations for their care for, and teachings about, our earth and our relations.

May we honor those teachings.

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