

**CRANE LEDGE WOODS COALITION TECHNICAL MEMO
ON 990 AMERICAN LEGION HIGHWAY**

TO: Mr. James Arthur Jemison
FROM: Crane Ledge Woods Coalition
CC: Caitlin Coppinger
DATE: June 20, 2022
SUBJ: Draft Project Impact Report, 990 American Legion Highway

Please find below Crane Ledge Woods Coalition technical comments on the Draft Project Impact Report for 990 American Legion Highway.

We conclude that a Final Project Impact Report is Required for the proposed project.

Article 80 Large Project Review indicates that a Preliminary Adequacy Determination will be prepared evaluating the Draft Project Impact Report. Where applicable, this Preliminary Determination identifies issues listed in the Scoping document but not adequately addressed in the DPIR.

Additionally, the Preliminary Adequacy Determination may identify new relevant issues not raised in the Scoping document.

CLWC has reviewed the DPIR prepared for the proposed 990 American Legion Highway project, and compared DPIR responses given to issues listed in the Scoping document by the BPDA, City Departments, the Impact Advisory Group, organizations, and the public.

Additionally, CWLC has identified new relevant, significant issues in the DPIR not raised in the initial Scoping document.

CLWC notes that compliance with minimal standards of Large Project Review filing by addressing each Article 80 line item does not then equate to a necessary finding that project impacts are less than project benefits.

The first is meeting threshold procedural requirements. The second, a finding that project benefits exceed project impacts, requires thoughtful evaluation of all evidence submitted, and comparing these to City of Boston regulations, policies, goals and objectives, most especially around climate change, environmental justice, and sustainable development as advanced by Mayor Wu.

Responses provided in the Draft Project Impact Report fall short in these and other key categories, as discussed below. The DPIR cannot serve as a basis for BPDA informed decision making or evaluation by Mayor Wu, other elected officials, City Departments, and the residents.

Based on this review, CLWC respectfully recommends and requests that a Final Project Impact Report be prepared for the proposed project.

Thank you for the opportunity to provide these detailed technical comments.

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**ISSUES IN SCOPING DETERMINATION NOT ADEQUATELY ADDRESSED
IN THE DRAFT PROJECT IMPACT REPORT DPIR**

Following the Draft Project Impact Report order of contents, significant issues listed in the Scoping Determination but not adequately addressed in the DPIR are as follows:

1.0 Project Description

1.6 Environmental Justice and Community Outreach.

Article 80 does not as yet have adopted Environmental Justice guidelines or requirements. The Wu Administration has stated that it views City plans and policies through an equity lens.

The Administration's Equity and Inclusion Cabinet strives, for example, "To support communities of color and marginalized groups across all departments and commits to build equitable governmental structures."

<https://www.boston.gov/government/cabinets/equity-and-inclusion-cabinet>

The neighborhoods surrounding Crane Ledge Woods and 990 American Legion Highway are an environmental justice community, with 95-100th percentile for people of color based on the US EPA mapping tool.

With this in mind, CLWC has evaluated the Environmental Justice and Community Outreach elements of the project's DPIR, and conclude they fall far short of the City's stated commitment to supporting communities of color.

A Final PIR process must address this basic deficiency, consistent with the City's goals of advancing plans and policies through an equity lens.

Developer project team lists at least 3 outreach firms, all located in downtown Boston. However after a brief series of communications early in the review process, CLWC was not contacted by any of these firms for further outreach nor is CLWC aware of any effort by any of these firms to engage with residents in the environmental justice neighborhoods surrounding Crane Ledge Woods.

The Scoping Determination requested a list of all community outreach meetings held for the Proposed Project. None appear to have been provided in the DPIR. [at A. General Information. 5. Community Process]

CLWC has held 6 widely inclusive community meetings publicly noticed and open to all. CLWC recommendation for full conservation with fair compensation to the owner and all parties has been based on feedback received directly from residents of the environmental justice neighborhoods surrounding Crane Ledge Woods.

The Final PIR process going forward leading to submission of a FPIR must include a meaningful, documented community engagement effort by the project team.

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1.7 City of Boston Zoning

The project is located in a Hyde Park NS Neighborhood Shopping district, but does not include any actual neighborhood shopping uses in the 14 acre site.

In addition to being in violation of the intent and purposes of NS Districts in the Hyde Park plan, the proposed project is not consistent with the Hyde Park Strategic Plan adopted by the BPDA in August 2011. See Appendix A.

The Final PIR must include analysis of how the proposed project is consistent with the Hyde Park Strategic Plan and the intent and purposes of NS District, which is to “encourage the development of neighborhood businesses that provide essential goods and services to, as well as jobs and entrepreneurial opportunities for, the Hyde Park community.” 69-10.

1.10 Project Team

In response to questions posed at two successive BPDA public hearings on June 8, 2022 and then on June 13, 2022, the proponent stated that their project team did include any professional firms led by or owned by people of color. This is unacceptable to CLWC and contrary to City of Boston policies and goals for contracting.

1.X Organized Labor (also 7.4.11.1)

The proponent's track record in its dealings with Boston workers and their families is unsatisfactory and of serious concern, as has been attested in public meetings hosted by Crane Ledge Woods Coalition and by the BPDA.

This record of both project team hiring disparity and of construction hiring does not promote the public safety, health, and welfare of the people of Boston, in violation of Article 69 and 80 of the Code.

Going forward, the proponent must fully address and resolve these serious disparities and practices in the FEIR stage of project review.

2.0 Transportation

The Scoping Determination describes the proposed project site at 990 American Legion Highway as “ . . . an isolated location from the rest of the transportation and transit network.” Traffic Impacts. Scoping Determination at p.24.

The proposed project is car-dependent, generating the well-documented adverse impacts associated with private vehicle use:

Personal vehicles are a major cause of global warming. Collectively, cars and trucks account for nearly one-fifth of *all* US emissions, emitting around 24 pounds of carbon dioxide and other global-warming gases for every gallon of gas. About five pounds comes from the extraction, production, and delivery of the fuel, while the great bulk of heat-trapping emissions—more than 19 pounds per gallon—comes

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right out of a car's tailpipe. Union of Concerned Scientists. *Car Emissions & Global Warming*. July 2014

The Mode Share allocation for the proposed project is designated as Zone 12 Hyde Park: 86% Vehicular, 8% Transit, 6% walking/biking.

As described in the DPIR, the project will increase private vehicle trips within an already highly congested local road network.

Transportation management measures identified do not describe a path of achieving City of Boston 2030 goals for reducing vehicle trips and transitioning to public transit and other low impact modes.

Accordingly, private vehicle trips associated with the project will move Boston further away from and not closer to the City's 2050 net zero carbon goals.

Boston Transportation Department September 2021 Transportation Demand Management Point System: Technical Justification states: "... across the board, the availability and cost of parking near a project site was found to be the most critical factor in determining travel choices."

While the DPIR indicates that parking space cost will be unbundled from housing, the DPIR does not quantify or indicate that the site parking plan will result in any reduction away from private vehicles to alternative transportation modes.

The effects of the other mitigation measures proposed to address Transportation impacts are also not quantified in the Draft Project Impact Report.

A Final Project Impact Report is required to much more fully evaluate Transportation impacts from the project and measure with evidence and data whether and how proposed transportation management measures will shift mode share and so reduce adverse impacts.

Among other things, the FPIR must include:

- a baseline transportation carbon budget for the project set at zero, and
- chart of the annual increase in CO2 and all other related impacts associated with the project, based on estimated VMT, and increase in idling time at the D, E, and F Level of Service intersections in the immediate transportation network area.

The FPIR Transportation section must show a plausible path to mode share shift achieving Go Boston 2030 targets of 25% to 30% reduction in private vehicle single occupancy trips, and the City's 2050 net zero carbon goal.

The FPIR must provide credible evidence showing how the 270 unit housing project will generate a projected 74 outbound / 73 inbound trips in the AM / PM peak commute hours. This projection indicates that only 28% of development households are leaving for work or school on any given weekday morning. This number seems unrealistically low.

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3.0 Environmental Component

3.3 Jurisdictional Wetlands.

The significant question of whether jurisdictional wetlands exist at the project site was not adequately addressed in the Draft Project Impact Report.

The City of Boston Environment Department provided a Scoping letter September 7, 2021 stating:

The Department recommends an independent, third-party wetlands assessment be conducted by a certified wetland scientist to determine whether any wetland resource areas are present, and that Department staff be present during this assessment.

The proponent's wetland consultant conducted an unaccompanied site visit on December 7, 2021 unaccompanied by City Environment Department staff and concluded that no jurisdictional wetlands existed anywhere on the property. Appendix F. Wetlands Field Investigation 990 American Legion Highway. Epsilon Associates, Inc. December 21, 2021.

Mass Audubon in their comment on the DPIR describes the limits of the December 7, 2021 evaluation and accompanying report:

Several key conclusory statements in the DPIR are not supported by the necessary engineering and hydrologic plans and analysis. Wetland delineation information is incomplete and not verified by the relevant jurisdictional authorities (Boston Conservation Commission, MassDEP).

The Wetland Determination should be investigated for inaccuracy and the full site should be assessed for presence of wetland plants, hydrologic features and hydric soils by a qualified wetland scientist with qualified staff from the City of Boston present. Mass Audubon Letter to Ms. Caitlin Coppinger, p5. June 17, 2022.

The Horsley Witten Group provided further detailed evaluation of the Wetlands data provided in DPIR as well as CLWC's materials provided to the Environment Department and Conservation Commission:

Resource areas: Based on information provided, the presence or absence of wetland resource areas that may be jurisdictional under the MA Wetlands Protection Act cannot be confirmed. At a minimum, the Applicant should be required to provide additional data and/or perform additional assessments in accordance with the definition under 310 CMR 10.55(2)(c)3. We recommend findings be verified by an independent third-party certified wetland scientist.

Horsley Witten: Stormwater, Wetlands and Permitting Review, Proposed Development at 990 American Legion Highway Hyde Park, Massachusetts. June 17, 2022.

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The Draft Project Impact Report did not adequately address significant, relevant issues raised in the Scoping Determination concerning jurisdictional wetland resources at the 990 American Legion Highway site.

The Final Project Impact Report must include “an independent, third-party wetlands assessment be conducted by a certified wetland scientist to determine whether any wetland resource areas are present, and that Department staff be present during this assessment.” as recommended by the City’s Environment Department.

3.4 Stormwater/Water Quality

3.5 Flood Hazard Zones

3.7 Geotechnical / Blasting

CLWC incorporates the expert analysis conducted by Mass Audubon dated June 17, 2022 and Horsley Witten.

CLWC refers the BPDA particularly to the documentation of severe local flooding provided by Michael Westwater in the Scoping Determination. Westwater email with photographs August 21, 2021. Scoping Determination p. 199 of 252.

Mr. Westwater is a City of Boston resident on Wilmot St. across American Legion Highway, and offers credible evidence of the existing flood risk in the project area.

The Final PIR must fully evaluate the flood risk at the 990 American legion site arising from the project, given the issues identified by Horsley Witten and confirmed by Mr. Westwater.

As part of the FPIR, the proponent must share all geotechnical, stormwater, and blasting studies relied on in its evaluation of the project.

3.9.14 Wildlife Habitat

The DPIR states:

The Project Site is in an established urban neighborhood. There are no wildlife habitats in or adjacent to the Project Site. The Project team has reviewed the regulatory maps for Priority and Estimated Habitats provided by MassWildlife’s Natural Heritage & Endangered Species Program and found that the Project Site does not contain any Priority or Estimated Habitats.

A Priority Habitat is based on the known geographical extent of habitat for all state-listed rare species, both plants and animals, and is codified under the Massachusetts Endangered Species Act (MESA). Estimated Habitats are a subset of the Priority Habitats, and are based on the geographical extent of habitat of state-listed rare wetlands wildlife and is codified under the Wetlands Protection Act (WPA).

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In this evaluation, the proponent relies on regulatory standards that are not applicable in this urban setting of Boston. Residents and abutters have testified to observing wildlife in their own backyards and at similar urban wild locations in Southwest Boston.

The DPIR's conclusory statements are insufficient to make a finding that the site does not have natural habitat value and that the project will not have adverse impacts on wildlife.

The BPDA should require that a comprehensive on-site natural habitat and wildlife analysis be included in the Final PIR, completed by an independent naturalist expert.

The FPIR must also evaluate as new information displacement of wildlife into bordering neighborhoods during the clear cutting and blasting phase of the project.

4.0 Sustainable Design and Climate Change Resiliency

4.3 Heat Island

The site's baseline condition as a large urban greenspace provides multiple benefits, including local and neighborhood cooling and mitigation of the heat island effects along nearby American Legion Highway, Hyde Park Avenue, and Cummins Highway corridors. City of Boston mapping shows these routes as well as Blue Hill Avenue as very high temperature heat island corridors.

The DPIR does not include sufficient information to assess project impacts on residents due to Urban Heat Island effects caused directly by the project.

The clear cutting of trees and understory on this site, together with the substantial increase in hardscape surfaces, building systems, and motor vehicle traffic, all will result in transformation of this site into a new heat island.

This is especially of concern as the City of Boston stated a commitment to equitable heat resilience, addressing urban heat island impacts in environmental justice communities as a priority. See Appendix B.

The City's Environment Department states:

Through leadership and collaboration, we can help prepare our communities, buildings, infrastructure, and natural spaces for the impacts of climate change, including extreme heat, while putting Boston on a path to becoming a Green New Deal city.

<https://www.boston.gov/environment-and-energy/heat-resilience-solutions-boston>

A Final PIR is required to fully evaluate heat island and related health impacts from the proposed 990 American Legion Highway project.

The Heat Island section in the FPIR should provide:

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- A “before project” baseline heat island map
- An “after project buildout” projected heat island map
- A quantitative evaluation of the public health impacts of any heat island increase
- A comprehensive analysis of whether and how the proposed project implements provisions of the City’s Heat Resilience Solutions Plan.

4.13 Net Zero New Construction.

To adequately evaluate the project in alignment with Wu Administration Green New Deal goals, the Final PIR must show that the 990 American Legion project will be Net Zero New Construction from Day 1.

Addressing climate change through net zero new construction and operation is an essential component of the City of Boston achieving its climate, environmental justice, and sustainable development goals.

The DPIR does not offer meaningful, measurable, and enforceable measures to meet Wu Administration Building emission goals.

A Final EIR is required to evaluate the impacts of falling short of the Administration’s Net Zero New Construction goals.

The FEIR must likewise assess feasible steps the project should integrate into its construction and operate to achieve the Administration’s goals.

Specifically, the Final PIR must include:

- A credible, testable rationale as to why Net Zero is not feasible now for the project
- A schedule of measures which will achieve the City’s Net Zero targets
- Carbon budget with baseline and construction and future operation emissions data

Technology exists today through “passive house” and similar means to achieve this standard, as is illustrated by the Building Emissions and Disclosure Ordinance [BERDO] provisions and in existing City of Boston policy and practice in the Mayor’s Office of Housing:

...there is little-to-no cost increase for building to Zero Emission Building (ZEB) standards. Total construction cost increases range from 2.5% or less before rebates and incentives are considered. The rebates and incentives currently available have the potential to make these buildings less expensive to build, with additional long-term operational savings.

City of Boston DND: *Guidebook for Zero Emissions Buildings*. 2020.

https://www.boston.gov/sites/default/files/file/2020/03/200306_DND%20book_FOR%20WEB.pdf

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Mayor Wu’s “Planning for a Boston Green New Deal & Just Recovery” (released in August 2020 as Councilor At-Large) affirms that Boston must accelerate its decarbonization efforts, adding that eliminating carbon emissions is “the baseline for protecting against the most destructive impacts of climate change.”

The plan states that Boston should reach total carbon neutrality — meaning sources have no net emissions because emissions are balanced with other efforts to remove carbon, like planting trees — by 2040, a decade earlier than the goal set by the city’s Climate Plan adopted by a prior Administration in 2019.

The Green New Deal plan establishes a City of Boston goal of 100 percent sustainable electricity by 2035 and net-zero municipal buildings by 2024, and for new construction such as at 990 American Legion Highway advances further goals reflecting the urgency of addressing climate change through new construction requirements:

The City of Boston’s 2019 Climate Action Plan set a goal of reaching carbon neutrality by 2050, with an interim goal of a 50 percent emissions reduction by 2030.

Although this is sooner than the goal set in 2004 for an 80 percent emissions reduction by 2050, it has become increasingly clear that even reaching net-zero by 2050 will mean no more than a coin flip’s chance of staying within habitable temperature thresholds. Cities must embody the spirit of an urgent, action-oriented drive to decarbonize our society and economy.

[https://www.michelleforboston.com/plans/gnd?mc_cid=96a8f17643&mc_eid=\[a45d320baa\]](https://www.michelleforboston.com/plans/gnd?mc_cid=96a8f17643&mc_eid=[a45d320baa])

990 American Legion Highway project as described in the Draft Impact Report does not show any reasonable path forward towards achieving City of Boston Net Zero New Construction targets and Mayor Wu’s Green New Deal goals.

Accordingly a Final Impact Report fully addressing these issues is required.

5.0 Urban Design

5.2 Trees

CLWC incorporates the expert analysis conducted by Mass Audubon dated June 17, 2022.

Please also see CLWC Appendix C concerning annotation of the DPIR tree inventory, showing the insufficiency of the DPIR Tree Analysis.

The DPIR Figure 5-19 “Existing Trees” site plan does not show how existing trees will be protected.

The Parks Department September 17, 2021 Scoping letter confirms that “Hyde Park has had the greatest loss of tree canopy of all Boston neighborhoods from 2014 to 2019.”

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The FEIR must include a full evaluation of the individual and cumulative impacts of this loss of tree canopy in Hyde Park, and address the difference in tree canopy value between mature and newly planted trees.

Materials prepared for the City’s Urban Forest Plan state that trees provide public health benefits as well as:

- Cultural value
- Lowered heat
- Better air quality
- Stormwater capture
- Wildlife habitat

These materials also confirm that “trees need to grow older to provide many of these benefits”. Urban Forest Plan. Final Presentation. March 14, 2022.

https://www.boston.gov/sites/default/files/file/2022/03/March%2014%20FINAL%20PRESENTATION_2.pdf

The Draft project Impact Report does not evaluate with meaningful, complete, and accurate quantitative data the impacts associated with loss of significant urban tree canopy at the proposed project site.

The FEIR must evaluate the proposed project for consistency with the City’s Urban Forest Plan and its Equity First commitment.

<https://www.boston.gov/departments/parks-and-recreation/urban-forest-plan>

5.3 Open Space & Recreation

The Boston Parks and Recreation Department September 17, 2021 Scoping letter requests that the proponent complete an Open Space Needs Analysis and Impact Assessment.

BPRD notes that under the applicable neighborhood Shopping District designation, there is no minimum open space requirements for the proposed housing development and its estimated 270 households.

The Draft Project Impact Report states that the proposed project will include 8.2 acres of open space. The DPIR further states that this open space consists of all space that is not a building street or parking. [DPIR 5.3 p. 214.]

However the DPIR does not provide any breakdown of the stated 8.2 acre open space total, whether by individual balconies, lawns and street parkways, active play spaces, rain gardens, or landscaped buffer areas.

It is thus impossible to evaluate DPIR conclusions as to whether the proposed project will have adequate on-site open space for future residents and whether it may cause impacts to off-site parks and recreation areas. See also Appendix D. Walkshed Map.

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The Final EIR must include the requested Open Space Needs Analysis and Impact Assessment by, at minimum:

- Providing a breakdown in line item detail of each type of open space within the stated 8.2 acre site total;
- Estimate the total number of residents by age group anticipated at the development (understanding that this will be an estimate);
- Provide an evaluation of the various open space and recreation needs of each age group projected to be living at the development;
- Provide an evaluation of the open space and recreation needs of each age group which may be addressed by use of nearby off-site facilities and locations.

5.x Archeological Resources

The Boston Parks and Recreation Department September 17, 2021 Scoping letter includes specific observation and recommendations concerning site history:

This site is part of an area that has been known by a variety of colloquial names, such as Crane's Ledge, Barry's Ledge, Barry's Quarry, Sally's Rock, Sallie's Rock, Grew's Woods and Pine Garden Woods.

Each name reflects a chapter of the history of this natural local landmark. Given its height and views, it is reasonable to expect that the site may have been of interest to native populations. This warrants consideration of the City of Boston's Archeologist.

BPRD's recommendation that the City's Archeologist evaluate the site was not addressed in the Draft Project Impact Report.

The Final Project Impact Report should include comprehensive evaluation of the site for cultural, historical, and archeological resources of significance to pre-colonial native peoples.

Crane Ledge Woods is listed as a significant community greenspace resource for protection in the Hyde Park Strategic Plan adopted by BPDA in 2011.

The Woods are also listed as a priority acquisition target in the City's adopted 2015-2022 Open Space and Recreation Plan.

These adopted planning documents were prepared through an open, widely-inclusive community process.

The individual and cumulative impacts of removing the 990 ALH site from the City's listed inventory of open space resources must be evaluated in a Final Impact report.

6.0 Infrastructure -

7.0 Response to Comments: New Issues Raised by Draft Project Impact Report

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Impacts of the proposed service road through the upper portion of the site must be addressed in the Final Environmental Impact Report.

7.1 Review Under the Massachusetts Environmental Protection Act (MEPA)

The required MEPA review must be coordinated with the Final Project Impact report, especially as MEPA now includes compliance requirements set forth in the Road Map Bill Senate Bill 9 - *An Act Creating a Next Generation Roadmap for Massachusetts Climate Policy*, significantly increasing protections for Environmental Justice communities across Massachusetts.

7.2 Housing & Affirmatively Further Fair Housing

The Project materials confirm that 990 American Legion Highway is located in “a high displacement risk area” Affirmatively Further Fair Housing analysis. Scoping Determination p47 of 252.

The proponent must be required to provide specific information as to the range of rents planned for the development, and make provision for home equity building for tenants, in order to offset displacement risk associated with the project.

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Appendix A

1.7 City of Boston Zoning

The proposed 990 American Legion Highway project is not consistent with the purposes, goals, and objectives of the Hyde Park Neighborhood Plan (Article 69) as the project:

- does not direct growth to where it can be accommodated
- does not preserve, maintain or create open space
- to protect the environment and improve the quality of life
- promote the most appropriate use of land
- promote the public safety, health, and welfare of the people of Boston

Development in an NS-1 Neighborhood Shopping District is intended to encourage the development of neighborhood businesses that provide essential goods and services to, as well as jobs and entrepreneurial opportunities for, the Hyde Park community.

The project does not propose any actual neighborhood shopping uses on the 14 acres site.

Additionally, the project is inconsistent with the Hyde Park Strategic Plan goals for NS Districts. The Hyde Park Plan was adopted by the BPDA in August 2011 after more than 2 years of community participation.

The BPDA should not encourage residents to participate in community planning exercises and then approve projects which are directly in violation of the wishes of residents as expressed in the approved plan.

The proponent should be required to submit their plans to Inspectional Services Department as part of the FPIR review

- **Section 69-1. - Statement of Purpose, Goals, and Objectives.**

The purpose of this Article is to establish the zoning regulations for the Hyde Park Neighborhood District. The objectives of this Article are to provide adequate density controls that protect established residential areas and direct growth to areas where it can be accommodated; to retain and develop affordable, moderate income, and market rate housing compatible with adjacent areas, particularly for families; to promote the viable neighborhood economy; to preserve, maintain and create open space; to protect the environment and improve the quality of life; to promote the most appropriate use of land; and to promote the public safety, health, and welfare of the people of Boston.

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Section 69-5. - Community Participation.

This Article has been developed with the extensive participation of the Hyde Park Neighborhood Strategic Plan Advisory Group, residents, neighborhood associations, and business groups. The role of community participation in determining appropriate land use regulations and zoning is critical to the success of any zoning article or development plan.

The Boston Redevelopment Authority shall continue to involve Hyde Park residents, civic associations, and business groups in an advisory capacity for future land use and planning initiatives for Hyde Park.

Section 69-6. Recognition of the Hyde Park Neighborhood Plan.

The Zoning Commission hereby recognizes the Hyde Park Neighborhood Strategic Plan dated August 2011 as the planning basis for the design regulations and guidelines for the Hyde Park Neighborhood District.

Section 69-10. - Establishment of Neighborhood Business Subdistricts.

This Section 69-10 establishes Neighborhood Business Subdistricts within the Hyde Park Neighborhood District. There are two types of Neighborhood Business Subdistricts: Local Convenience ("LC") Subdistricts, providing convenience retail and services for the immediate neighborhood and pedestrians, and Neighborhood Shopping ("NS") Subdistricts, providing convenience goods and services to the larger neighborhood and surrounding areas. The NS Subdistricts are further subdivided into NS-1 and NS-2 Subdistricts, the latter of which allows for moderately greater FAR and promotes mixed use development. Both types of Neighborhood Business Subdistrict encourage the development of neighborhood businesses that provide essential goods and services to, as well as jobs and entrepreneurial opportunities for, the Hyde Park community.

The following Neighborhood Business Subdistricts are established:

13. American Legion/Cummins Neighborhood Shopping (NS-1) Subdistrict
(As amended on May 22, 2014)

TABLE B - Hyde Park Neighborhood District Use Regulations Neighborhood Business Subdistricts and Local Industrial Subdistricts

FN 9: Where designated "A" in a Neighborhood Shopping Subdistrict or a Local Convenience Subdistrict, provided that such use is Forbidden on the first story.

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Appendix B

Heat Resilience Solutions for Boston

1. Boston is already experiencing the effects of climate change.

In Massachusetts, we have already seen average temperatures increase by almost 3.5°F. Over the last decade, Boston experienced more hot days and nights than any decade in the previous 50 years.

2. We will experience increasingly hotter summers and greater heat stress.

Even if major action is taken to reduce emissions, the number of days in Boston over 90°F will increase from a historical average of 10 days per year to as many as 46 days per year by the 2070's.

3. Preparing for hotter summers is critical to public health and safety.

In the United States, extreme heat is already the #1 cause of weather-related deaths, more than tornadoes, hurricanes, flooding, and cold weather combined.

4. We must continue to prepare for both the near-term and long-term.

The Heat Plan provides a citywide framework to build a more just, equitable, and resilient Boston, both today and in the coming decades.

5. The entire city of Boston is a heat island.

Cities like Boston have densely developed buildings, asphalt, pavement, dark roofs, and other heat sinks that store and release heat on a hot day, resulting in average temperatures that are higher than surrounding communities.

6. Not everyone experiences a hot day in Boston in the same way.

Some areas of Boston are hotter than the rest of the city, entering high-heat conditions sooner, reaching higher air temperatures, and remaining in heat wave conditions longer.

7. Equitable heat resilience means putting people at the center.

We can deliver more just and equitable outcomes for residents by also increasing access to cooling resources and addressing underlying factors that result in greater burdens upon some residents.

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8. How we build climate resilience matters.

By centering people and personal experiences alongside policies focused on infrastructure and buildings, we can deliver a wider range of strategies that can better address individual and systemic injustice and inequity.

9. Preparing for hotter summers provides multiple benefits.

Investments in heat resilience can provide multiple benefits, including lower greenhouse gas emissions, less air pollution, healthier residents, safer commutes and workplaces, and greater quality of life.

10. Together, we can build a more just, equitable, and resilient Boston.

By implementing the strategies in Boston's *Heat Plan*, we can help put Boston on a path to becoming a Green New Deal city and ensure that everyone can thrive in the face of climate change.

<https://www.boston.gov/environment-and-energy/heat-resilience-solutions-boston>

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Appendix C

Draft Project Impact Report Tree Inventory and CLWC Annotation



Tree Inventory

- 904 six inch plus caliper trees
- 89% Good or Fair condition
- Did not count the hundreds of 3-5 inch caliper, 20-30 ft. tall trees that connect the dense tree canopy, including some beautiful birch stands.

Figure 5-19 Existing Trees

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Appendix D

Boston Walkshed Parks, Open Space and Recreation Plan 2022-2028

Crane Ledge Woods - Unprotected Color: Cream = Beyond any park service area Lightest Green = Served by only 1 park



ACCESS: PARK SERVICE AREAS

- | | |
|------------------------------|------------------------|
| Beyond any park service area | Included in analysis |
| Served by 1 park | Excluded from analysis |
| Served by 2 parks | |
| Served by 3 or more parks | |

What was included in this analysis? Publicly accessible and permanently protected parks. Of these parks, we included urban wilds greater than 0.5 acres. Community gardens and cemeteries were excluded. Walksheds created based on park size: 0.1 mile walkshed for parks <0.25 acres, 0.25 miles for parks 0.25-5 acres and 0.5 miles for parks 5+ acres in size.