



October 11, 2013

Secretary Richard K. Sullivan, Jr.
Executive Office of Energy and Environmental Affairs (EEA)
Attn: Deirdre Buckley
100 Cambridge Street, Suite 900
Boston MA 02114

RE: Comments on the DEIR for Caesars Resort At Suffolk Downs, MEPA #15006

Dear Secretary Sullivan:

WalkBoston has reviewed the DEIR for a Caesars Resort at Suffolk Downs. The DEIR documents walking improvements that the proponent will undertake as part of the plan and we are generally pleased with the proposals. We offer comments below to supplement the current proposal with further improvements.

The scale of the site proposed for this project is noteworthy. The existing roadway extends nearly a mile through the L-shaped site between Route 1A and Winthrop Avenue, and the site is roughly 3,000' north-south and east-west. Opportunities for integration with the existing community are substantial, as the site is bounded by industrial uses on the west side, by residential neighborhoods on both the north and south sides, and by the combination of the MBTA Blue Line, Bennington Street and the Belle Isle marsh on the east side. The urban setting of the project sets the stage for planning elements to allow the development to relate physically and operationally to the surrounding community.

Recognizing the scale of the site, its urban location, and the number of people anticipated to be present each day, the proponent has made efforts to shift trips away from private vehicles and toward public transportation. This is in keeping with the recently announced MassDOT statewide goal of tripling the share of walking, bicycling, and transit travel in Massachusetts. Reducing auto dependence would also reduce the environmental impacts of the development and help preserve capacity on the adjacent highway network. In addition, encouraging greater use of active travel options – walking and biking - will help the development achieve some positive public health effects. We believe that there are additional measures that could be taken to further reduce auto trips and have described several opportunities in our comments.

The details of the development plan offer evidence of some innovative thinking that has created opportunities for walkers on the site. For example, the introduction of water-catching swales on parking lots creates an opportunity to construct parallel walkways that are more pleasant ways of walking through open parking areas.

Our comments are organized into those affecting access to and through the site and the pathways that help people get where they want to go within the site.

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A. Access to the site via MBTA rapid transit service.

The Blue Line forms one boundary of the site, and has two stations near the proposed project – Beachmont Station and Suffolk Downs Station. Most of the Blue Line users are expected to use the Suffolk Downs Station. This is reflected in the proposed walkways, bikeways and shuttle bus services to be constructed at that location. No improvements are proposed at Beachmont Station.

The proponent has estimated that 15% of daily trips to and from the site will be made via the Blue Line. A total of 4,000 on-site employees are projected, and 40% of these employees, or 1,600 people, are expected to use public transit daily. In addition, 11% of the 23,674 to 32,992 daily casino visitors (2,614 – 4,086 people) are expected to use the Blue Line for access. Since there is no current MBTA bus service to the site, all of the public transit users – some 4,000 to 6,000 people per day – are expected to access the site via the Suffolk Downs Station, which in recent years has handled daily traffic of roughly 1,000 riders.

In recognition of this major impact on the use of rapid transit by employees and visitors to this site, the Suffolk Downs Blue Line Station will be upgraded by the proponent to handle anticipated transit and foot traffic. Elevators will be added on both sides of the tracks to make the station fully accessible and convenient for people wanting to cross the tracks between Bennington Street and the site. We offer several suggestions regarding the MBTA station and the access it provides to the site:

1. A new plaza in front of the station should encourage access for all users, using a design that provides adequate space for walkers, bicyclists and shuttle bus users.
2. The connection into Orient Heights should be enhanced and the proponent should work with neighborhood residents to design a connection that encourages safe and pleasant walking to the station.
3. The shuttle bus shelter proposed near the plaza should have signage that includes both bus and walking information, including the estimated walking time from the station to the casino and other facilities in the proposed development.
4. Walkways between the station and on-site buildings should be attractive, safe and conducive to walking. Separate paths for pedestrians and bicycles are an important and positive design feature. This separation should be made very clear to users, through a significant landscaped buffer strip and wayfinding signs that clearly indicate the separation. Different textures or colors of surface pavement, slightly different elevations, or decorative pathway curbs could all help signify which path belongs to pedestrians. Walkway lighting could also be designed to distinguish pedestrian lighting from the roadway/bikeway lighting.
5. East Boston Greenway connections should be thoroughly explored. The Belle Isle Marsh lies across Bennington Street from the main entrance to Suffolk Downs MBTA Station. Plans show a path along the marsh edge connecting to the existing East Boston Greenway, and the proponent has agreed as part of a consent decree with the US EPA to fund a new boardwalk at Belle Isle Marsh to improve public access and protect natural resources within the marsh. In the short term, the path and the boardwalk should be considered concurrently and include a link to the Suffolk Downs Station. Pedestrian access improvements on Bennington Street could include moving the existing crosswalk now located at Leverett Street 200 feet north to align with the main station entrance and the route of the Greenway at the edge of the marsh. This would allow an extension of the

Greenway into the proponent's site, where significant new open space with paths and nature trails could expand and extend the Greenway network to Route 1A and to Winthrop Avenue.

6. Future Greenway connections should be considered. The East Boston Greenway, if extended through the proponent's site to Route 1A, could eventually be extended to link with walkways on the opposite side of Route 1A along Chelsea Creek in Revere, where open spaces are cited in the DEIR as possible future projects.

B. Access to the site via MBTA bus service

The DEIR includes a proposal for MBTA bus service within the site, including a stop on Tomesello Drive near the entrance to Casino Area II, but bus service on Route 1A is not addressed in the DEIR. MBTA bus service should be more completely examined, as it could significantly affect access to the site from throughout the region. In addition, it could affect internal site pathways – their alignments, construction standards and levels of potential use.

1. MBTA bus service within the site has not been detailed to explain off-site routings and their consolidated or separate connections into the site. Such bus service might supplement private carriers such as the anticipated dedicated charter buses and shuttles from Logan airport, nearby business districts and other major tourist, cultural and travel venues in Boston, Revere, and the surrounding region. MBTA bus service should be more clearly explained as a possible option, including potential routes that might be devoted to accessing the casino/racetrack on this site from a variety of locations.
2. MBTA bus service along Route 1A should be more thoroughly explored. Currently, MBTA service on Route 1A consists primarily of express buses which run between Salem, Lynn and Boston or the airport. Route 1A may also be an appropriate route for bus service that serves this site and could affect the attractiveness of public transit options.
3. Future Route 1A bus service might stop near the site's principal entrance at Tomesello Drive. Bus stop locations would need to be closely coordinated with proposed traffic signals at Route 1A and Tomesello Drive because pedestrians would cross Route 1A using this signal. It is likely that a separate pedestrian phase at the signal would be needed.
4. Route 1A bus stops at Tomesello Drive should be connected to all pedestrian paths leading to the casino and racetrack. A primary, well-marked pedestrian path is essential and should be located on the same side of Tomesello Drive as a bus stop. It should be well designed, attractive to walkers, safe, well lit, and signed to reassure visitors that they are on the right track. Ideally, the pedestrian path should be separated from the bicycle path. Distances in time might be added to encourage walking along this route. It is about a 10-minute walk from Route 1A to the entrance to Casino II.
5. Late night MBTA transit service should be considered to serve both patrons and staff. This may require subsidies by the proponent to support increased transit service that would not otherwise be provided by the MBTA, such as late night Blue Line service or bus shuttles from Downtown Boston. Late night service would help shift workers and patrons away from private vehicles.

C. High Quality Design, Amenities and Year Round Maintenance

WalkBoston assumes that the proponent will commit to providing the levels of landscaping, lighting, security, snow shoveling and maintenance needed to make transit riders, pedestrians and bicyclists feel invited, safe and comfortable year-round. Because the site is so large, and the length and number of pathways and sidewalks are so substantial, this will require a serious commitment of resources. WalkBoston believes that this investment is needed to ensure that the proponent's projection that 15% of trips to the site will occur via the Blue Line. As noted above, we urge the proponent to also investigate the potential to shift additional trips to public buses.

D. Pedestrian paths through the property

WalkBoston is pleased to see the attention paid to walking paths through the property. Each of the paths are discussed below.

1. The path between Suffolk Downs MBTA Station and the South Plaza is the site's prime example of walking/biking path separation. Separate paths are preferred by both walkers and bikers and should be considered for the other paths on the site. The path follows a new street called Blue Line Road that will provide access for the shuttle bus between transit and the casino and other facilities. The physical layout includes a 23' roadway, with an 8' two-way bikeway immediately adjacent to it. An 8' two-way walkway is separated from the bikeway by a 6' wide greenway and from the horse track by an 18' landscaped buffer and fenced grassy area.
2. The path along the edge of the racetrack connects directly with the station path described above and provides one part of a connection that traverses the entire site from south to north, on a route that follows the edge of the racetrack, past the apron, the paddock for parading horses and the grandstand. It connects to the Sales Creek Path and the path leading along the edge of the North Parking Lot and to Winthrop Drive at north edge of the project site. This long attractive walking route could potentially be of significant use as a recreation trail. However, the DEIR calls for 'controlled' use of the path, and the degree to which public access will be allowed should be explained in detail.
3. Possible pedestrian connections to Orient Heights. The edge of the proponent's site is separated from Orient Heights by a steep grade along most of its southern boundary. However, at one location, near the point where Tomesello Drive currently makes a 90-degree turn, the grades of Tomesello Drive and Waldemar Avenue coincide. If the residents of Orient Heights are interested, the project proponent should explore new pedestrian access at this location to provide a connection into the South Parking Lot which would allow pedestrians to walk via on-site pedestrian paths and sidewalks between Orient Heights and the Suffolk Downs facilities and the shopping area along the west side of Tomesello Drive.
4. Path connections meet at the South Plaza, where there is a major entrance into the casinos. This is where the path from the Suffolk Downs MBTA station and from the South Parking Lot connect with the Winter Garden entrance and the link between the casino areas and the North Plaza. The plaza is proposed to be a shaded space with adjacent activities such as a sidewalk café. It has a good model – the Lincoln Center grove of trees – and affords a place to walk, with ample sitting areas where people can wait to meet

others arriving at the south entrance, or take an outdoor break from other activities. The South Plaza is also called out as a location for active events. A description of the possible events should be provided, as they may affect the layout and pedestrian use of the plaza.

5. The path between the Route 1A site entrance and Casino Area II is a handsome entrance amenity for the site. It will become especially important if bus service and bus stops are added at Route 1A. The total distance from Route 1A to the entrance to Casino Area II is approximately 2,400' – about a 10-minute walk. At the moment there are two paths proposed, passing through areas to be extensively landscaped around restored water areas. The paths could readily become parts of the East Boston Greenway.

However, the alignment of the walks may need attention for walker safety. The current location of the walks, though parallel to Tomesello Drive, is some 50' away from it. This distance may be too far for walkers to feel safe. Many designers suggest that pedestrians should be visible from the roadway and that they should be able to reach the roadway in case of an emergency. A more suitable distance, predicated on safety, should be explored.

It may also be useful to explore if both of these walkways through this pleasant green area are essential. One walkway, located along the desire line of people expected to use it between the bus stops on Route 1A and the casinos, may be all that is needed. The proposed bollard lighting system sounds promising and should help provide maximum safety for walkers.

6. Paths from Route 1A lead to the plaza/main entrance to Casino Area II where significant vehicular access is proposed. Four lanes serve the entry point and there are direct connections into the underground parking beneath Casino II for this valet parking area. At this entry point, a large roof above the vehicle lanes (called a porte cochere) provides weather protection. Because many vehicles, including taxis, will arrive on each of the four lanes, it will be important to know how pedestrians will be able to safely walk between their cars and the entrance to the casino. (This area is similar to the drop off and pick up area at airport terminals, where many pedestrians are required to walk across a number of lanes of arriving and departing vehicles.)

An additional question concerns direct access for people arriving from Route 1A or from the MBTA Station on foot. The current plan includes an indirect route for the approaching walkway rather than a more direct route. People who have walked from Route 1A should not be asked to walk several hundred feet out of their way when they can see the entrance clearly ahead of them.

7. Paths along Tomesello Drive north of the casino area are proposed for the west side of Tomesello Drive as far as the traffic circle entrance to the parking garage and North Plaza. On the east side of Tomesello Drive, paths are shown from Route 1A all the way to Winthrop Ave. The path on the east side is separated from the road by an 8' buffer; on the west side it is not clear whether a buffer is provided. The paths are 14' wide and are two-way shared bike-ped facilities. A planted 6' wide slope separates the path from the parking bays north of the parking garage. Overhead lighting is designed to provide illumination that differs between the roadway and the path.

The proponent should consider whether the proposed path on the west side of Tomesello Drive is essential for access to any part of the site, and whether it will see much use.

8. Path connections at the North Plaza will serve significant numbers of visitors who will enter both casinos via this large square. The plaza provides access for all bus and limo shuttle services at a scale that indicates that many buses are anticipated. At the north end of the plaza there is a weather-protected drop-off location where individual drivers can access Casino Area I and the racetrack. Access to Casino Area II is provided at the south end of the plaza through the Winter Garden.

The North Plaza is approximately 500 feet long and 200' wide, encompassing 2.2 acres. It is laid out with two lanes of traffic surrounding it (suggesting a one-way pattern of traffic movement) with adjacent sidewalks for loading and unloading visitors to the sidewalks adjacent to the casino entrances. Vehicular access into and out of the plaza is provided by four lanes of traffic that connect the plaza and the large parking garage to Tomesello Drive. No pedestrian paths are provided along these routes.

The plaza is designated as an event space and viewing area, which is still undefined. The side of the plaza abutting the Grandstand and Casino Area I appears to have the widest sidewalk leading directly into the casinos. This is where many of the bus and shuttle services are likely to discharge and pick up passengers. On the opposite side of the plaza is the large parking garage. Rather undefined sketches show the first floor of this garage as a future retail area.

It will be important to design the North Plaza so that pedestrians have a pleasant and safe walking experience. Especially important will be the provision of visual interest for the very tall and lengthy facades and the provision of landscaping to provide walker-friendly scale and materials. To clearly separate pedestrians from vehicles, safety improvements such as bollards, seating areas between the line of trees, and different treatments of sidewalk surfaces should be considered. To make the area more interesting for walkers entering the casinos, the west wall of the Grandstand facing this long sidewalk might be considered for the installation of art or information diagrams or posters.

It is also important to ensure that air circulation systems diminish the accumulation of exhaust fumes from the many vehicles in the plaza.

9. Paths to and through the parking structure should be detailed. A second-level walkway connects the garage directly into Casino Area II, but access from the garage to Casino Area I and the racetrack involves crossing the busy North Plaza at crosswalks. These crosswalks should be designed for the safety of walkers passing through the traffic bringing visitors to the site.

10. The path between the North Plaza and the North Parking Lot is a long, straight walkway serving users of the 1,468 parking spaces. A tree-lined path connects all of the site's activities to the shopping area west of Tomasello Drive.

As a unique on-site feature, transverse swales across the parking lot are planned to direct storm water runoff into the underground drainage system. It is unclear if these swales will be landscaped. As currently planned, there are four transverse swale areas laid out to separate every three or four rows of parking and to collect runoff through their permeable surfaces. For each of these transverse swale areas, the opportunity exists to create shaded walking paths along each swale. A similar opportunity may exist at the South Parking lot.

11. The Sales Creek Path is approximately 800 feet long, and extends from the racetrack

diagonally to Tomesello Drive on a route that parallels an original waterway. This route affords the proponent an opportunity to use the creek as a focus of landscaping to provide screening at the edge of the North Parking Lot, and create a shaded place to walk. It might be possible to extend the landscaping along the creek up to Tomesello Drive on both sides of the street, and use the creek as a major feature that designates the entrance into the site.

E. Boardman Street Overpass

A path along the proposed Boardman Street overpass should be constructed to replace the existing sidewalk that parallels Route 1A between Boardman Street and the site entrance. A buffer strip between the sidewalk and the overpass would be desirable, as the overpass is likely to be very busy. Connections into existing adjacent open space and the new sidewalk might be considered in consultation with residents of Orient Heights.

We appreciate your consideration of our comments and look forward to your responses to them. Please feel free to contact WalkBoston with questions you may have.

Sincerely,



Wendy Landman
Executive Director



Robert Sloane
Senior Project Manager