



March 26, 2013

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

RE: **Comments on ENF for Caesars Resort at Suffolk Downs - EEA #15006**

Dear Secretary Sullivan:

WalkBoston has reviewed the ENF for Caesars Resort at Suffolk Downs. We find agreement with the general design, as it seems directed toward providing safe facilities for pedestrians. A number of design details should be more closely investigated as part of the DEIR. Our comments about those details follow.

Underlying Assumptions

Many of the patrons and staff of the casino complex and racetrack will arrive on foot from transit stations or parking lots. Thus walking should be a significant element of the project design, coordinated with vehicular routes to minimize potential conflicts. Walking, transit and bike use should be maximized in keeping with the Commonwealth's goal of tripling the share of walking, biking and transit use. Access to and from the two MBTA stations and the Route 1A bus lines, and access between distant parking locations and the casinos and the racetrack are the primary routes to be addressed. Walking access between the site and adjacent residential areas should also be addressed.

Good information about the projected volumes of pedestrians (and bicycles) should inform the design and size of facilities.

For example, the ENF states that most employees will come to the site via public transportation. While not explicitly stated, we would anticipate that nearly all would walk from the MBTA stations into the site (unless shuttle service is provided). Because the Suffolk Downs Station is considerably closer to the proposed buildings than Beachmont Station, it will likely attract more users. The walkway from the station into the site should be designed to accommodate the anticipated volume of walkers (and bicyclists if they will use the same route) and the projected volumes should be included in the DEIR.

Overall Design Issues to be addressed

- The design of walkways and walk routes should be attractive, include high quality landscaping, and feel inviting both day and night, winter and summer. Designs should include:
 - A network of short distance walkways to encourage people to walk on site.
 - Lighting for safety, using designs that do not spill into residential areas or obscure the night sky
 - Safety and security especially given late night operations for employees and patrons, where there are fairly long walks such as the one to the Suffolk Downs MBTA station
 - Benches
 - Smooth surfaces on all walkways
 - Year round maintenance including snow shoveling
 - Shade while walking to the casinos and hotels

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- In New England, inclement weather is inevitable, suggesting the possibility of providing shelters or coverings along walkways, or alternative means of reaching destinations, such as a shuttle bus service
 - Wayfinding for pedestrians – Signage should be employed as fully as possible to help pedestrians find their routes within this very large site. Signs would also encourage the use of MBTA bus routes and subway facilities, and should be used to designate access points in the event an on-site bus shuttle service is provided. Other off-site locations of interest should be included, such as the Belle Isle Marsh Reservation, Revere Beach and potentially the Target/Super Stop and Shop complex, the racetrack’s horse barns and other sites that might improve the experience of nearby residents as well as patrons of the casinos, the racetrack, and the hotels.
 - Parking lots should be designed attractively, with trees and with defined walking paths that are separated from moving vehicle areas within the lots
- Multi-use path design.
The paths on the site that are walking/biking multi-use paths should provide appropriate widths to allow for safe shared use. MassDOT standards (Mass Highway Department Project Development and Design Guide, 2006), call for multi-use paths to be 10– 14 feet wide to accommodate both pedestrians and bicycles, and for wider facilities if substantial volumes of foot and bike traffic are anticipated.

Tomasello Way/Rte 1A intersection and Tomasello Way Design

- Bus service
Bus service along Rte 1A is already substantial. Routes along the roadway connect Salem Center, Marblehead and Peabody Square to Haymarket and Downtown Crossing – 6 bus routes in total. Well-designed and highly-visible bus stops, along with weather-protecting shelters, should be included in the revamping of the intersection of the Tomasello Way/Rte 1A intersection.
- Signals and crosswalks
In keeping with the intersection’s importance as the front door of the proposed development, the intersection will need to be fully signalized for safety for all users, including pedestrians who will be crossing Rte 1A to and from the new bus stops and shelters. In the re-signalization of the intersection, pedestrian count-down signals should be employed.
- Access between the intersection and the on-site facilities
The proposal includes a major pedestrian way leading from the intersection of Tomasello Way and Rte 1A into the main entrance to the casinos, the racetrack and the hotels. It appears to be useful and attractive, but it must be made safe for walkers and is worthy of significant improvements to make it safe. According to the preliminary drawings, the walkway will be located in the median strip of the rebuilt south portion of Tomasello Way. This is a formal design that could be handsome, but it results in a strip of walkway in the median that could be difficult for walkers to access, because it requires them to cross roadways on both ends of the walkway – near Rte 1A and at the casino/racetrack entrances, as well as at intermediate locations in between – five crosswalks in all. A better solution might be to have the pedestrian way located on the south side of Tomasello Way, with more direct access across the street at a point where the walkway is closest to the casino. This would reduce potential pedestrian/vehicle conflicts along the full length of this stretch of Tomasello Way.
- Amenities along Tomasello Way

Pedestrians walking via Tomasello Way have a relatively long walk between Rte 1A and the site (roughly equivalent to 3-4 city blocks). The preliminary drawings show lines of trees that will be very appropriate to make a pleasant walk. Seating along the way would also make the route more attractive and allow people to rest as they make their way to the casinos or the racetrack.

- A sidewalk connecting Tomasello Way and Waldemar Avenue in Orient Heights
A wholly new but short on-site sidewalk connecting Tomasello Way and Waldemar Avenue would allow Orient Heights residents to reach the bus stops at the intersection of Rte 1A and Tomasello Way, and to be able to walk to the casinos or the racetrack.
- A roadway connecting Tomasello Way to Waldemar Avenue in Orient Heights
Consideration of a sidewalk connecting Tomasello Way and Waldemar Avenue should include examination of a future road connection as well. A new, relatively short street to link Tomasello Way to Waldemar Avenue could reduce problems at the intersection of Waldemar Avenue and Route 1A near the Tomasello Way entrance to the site because it would allow Orient Heights access to be diverted to the Tomasello Way entrance to the site. The connection could include options for improving the safety of nearby residents:
 - Waldemar Avenue could become a dead-end street before reaching Rte 1A; or
 - It could be made one-way inbound toward the residences; or
 - It might be connected to Vallar Road if gradients are favorable.

The continuation of Tomasello Way to the Suffolk Downs MBTA station

A driveway currently exists along the proponent's property line between the Rte 1A entrance to the site and the small turnaround space in front of Suffolk Downs T station. The west half of this route has been covered above. However, the future of the east half of the driveway is unclear, even though it could be used for vehicular and pedestrian traffic as part of the larger plan. An explanation should be provided as to:

- Whether this driveway will become an access roadway providing service both to the south entrance to the casino, and to the Suffolk Downs MBTA Station.
- Whether this driveway will be extended to connect into the local roadways of Orient Heights, such as Waldemar Avenue, Walley Street and Bonito Square. This connection could relatively easily reach Bennington Street as well, and could become a major route for vehicles entering or leaving the site.
- Whether an improvement is planned for the pedestrian component of the service plaza at the MBTA Station.
- What the pedestrian connections along this roadway will become, as it provides a major walkway between the MBTA station and the casinos and hotels. This connection might also be used to enhance direct access from neighborhood walkways into the station.

Pedestrian access from off-site locations

- Pedestrian access between Orient Heights and a potential Route 1A bus stop at Boardman Avenue.
A partial interchange is proposed for the intersection of Boardman Avenue (Route 145) and Route 1A. The proposal calls for a northbound overpass above Rte 1A to pass over the turning between Rte 1A and Boardman Avenue. The overpass design and focus of turning traffic at the intersection suggests some difficult crossings for pedestrians from Orient Heights. Bus stop access for pedestrians should be explored as part of the proposed partial interchange. It may be possible to link Boardman Street access to the bus stop at Tomasello Way.
- Pedestrian access between Orient Heights and the Target/Super Stop and Shop complex
The ENF notes that walkers from Orient Heights need to cross the Suffolk Downs site to get to

the shopping complex located near the intersection of Tomasello Way and Furlong Drive, which are important businesses for Orient Heights residents to use. Data support-ing this suggestion would be useful. The multi-use path along Tomasello Way will improve this walk. From a pedestrian point-of-view, the suggested location of the walkway on the east side of Tomasello Way results in pedestrians from Orient Heights crossing at least 6 streets on route to the shopping complex, unless they follow the alternative walking route that hugs the buildings. The proponent should examine whether the walkway could be moved to the west side of Tomasello Way to reduce the number of crossings. Pedestrians walking along Tomasello Way should also be protected from walking through either of the two roundabouts at the approach to the hotels and casinos. Roundabouts are not very safe for pedestrian because of the potential conflicts with turning vehicles.

- Pedestrian access between Crescent Heights and the Target/Super Stop and Shop complex
Residents of the Crescent Heights neighborhood at the north edge of the site could also reach the shopping area via the Tomasello Way walkway.
- Racetrack walkway to the Target/Super Stop and Shop complex
The plan includes a walkway between the racetrack and the Target/Super Stop and Shop via the edge of the northern parking lots. The intersection of this walkway and Tomasello Way should be moved slightly to align with the front entrance to the shopping complex. The volume of foot traffic at this intersection may be low, but further exploration may suggest the need for a traffic signal with WALK signals.

Potential shuttle bus service

Shuttle buses should be considered to help people get around and to provide options during inclement weather. Options for shuttle bus stops include main entrances to the casino and race track, the Suffolk Downs and Beachmont MBTA stations, bus stops on Route 1A at Tomasello Way, the bus stop on Winthrop Avenue, and for access to the more remote parking areas. Facilities to support shuttle bus service may include the addition of a turnaround area in front of Suffolk Downs MBTA Station and a u-turn on Tomasello Way just short of Route 1A. Shuttles may also be useful to serve future night transit service on the Blue Line and elsewhere.

Local Community Benefits - pedestrian improvements at other locations

The ENF includes suggestions that certain improvements outlined by the Lower North Shore Traffic Study of 2000 could be included as part of the mitigation for the construction of this facility. Although no detail has been supplied on these locations, they appear to include intersections at Route 16 at Winthrop Avenue/Harris Street, the vicinity of the Beachmont MBTA Station in Revere, in the vicinity of Route 16/Route 1A/Bell Circle in Revere, and, in East Boston, at Bennington & Saratoga Streets at Orient Heights MBTA station and Boardman St. in East Boston. Many of these improvements have been requested by the affected communities and will need to be detailed in further submittals to show potential impacts on pedestrians.

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

Sincerely,



Wendy Landman
Executive Director