



BOSTON  
TRANSPORTATION  
DEPARTMENT

October 11, 2013

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*Via U.S. and Electronic Mail*  
Secretary Richard K. Sullivan  
Executive Office of Energy and Environmental Affairs  
Attn: MEPA Office  
100 Cambridge Street, Suite 900  
Boston, MA 02214

**Reference: EOEEA# 15006**  
**Caesars Resort at Suffolk Downs**  
**Transportation**

Dear Secretary Sullivan:

The City of Boston is pleased to have the opportunity to comment on the Draft Environmental Impact Report (DEIR) submitted by Sterling Suffolk Racecourse, LLC (“Suffolk Downs”) for the above referenced project. As noted in our prior correspondence, the City, and specifically the Boston Transportation Department (BTD), is committed to protecting the transportation interests of the City, in particular City residents, relative to the resort proposal. With that in mind, the City has worked closely with the community and Suffolk Downs to fully understand the anticipated transportation impacts associated with the resort and to ensure that acceptable transportation infrastructure and planning will be provided.

The City of Boston reached a Host Community Agreement (HCA) with Suffolk Downs which includes a detailed transportation plan. This Agreement is the result of a full professional review of the regional transportation plan. *Please see Section III. L. and Exhibit E of the Agreement.* The transportation components of the HCA are included in the DEIR and define commitments for transportation mitigation in East Boston. The negotiated transportation system improvements, to be funded by Suffolk Downs, will address the many transportation concerns that have been raised by the East Boston community. Specifically, the HCA provides that:

- Project related congestion impacts on Route 1A will be fully mitigated by, subject to MassDOT approval, construction of the proposed Route 1A northbound flyover at Boardman Street and related improvements;

THOMAS M. MENINO, Mayor

- Project related congestion impacts will be fully mitigated on City streets by a commitment to provide upgrades numerous separate intersections in East Boston;
- Suffolk Downs has committed to spending a *minimum* of Forty-Five Million Dollars (\$45,000,000.00) on the transportation improvements set forth in Exhibit E of the HCA, and this cost is exclusive of land acquisition or right of way costs;
- Suffolk Downs has committed to spend a *minimum* required amount of Nine Million Three Hundred Twenty Thousand Dollars (\$9,320,000.00) to be allocated and expended in connection with transportation improvements within City owned and maintained streets and sidewalks. Specific detail on the City streets and sidewalk improvements is provided in the Exhibit E of the HCA;
- The alternative travel mode needs of the project will be addressed by Suffolk Downs investments in sidewalks, bike paths and bike lanes internal to the site, along Tomasello Drive and along Bennington Street and by Suffolk Downs' commitment to provide two Hubway stations serving the site and to help fund water transportation in East Boston;
- Suffolk Downs takes all reasonable and practical steps to achieve its transit mode share objectives through its proposed travel demand management plan, proposed MBTA Blue Line station linkages and *minimum* \$3 million investment in station upgrades;
- Acceptable parking supply and parking management is provided under typical and all special event conditions to ensure that resort related parking demands do not spill over on to East Boston streets; and,
- Construction traffic will be effectively managed to minimize impacts on major routes and preclude any impacts in residential neighborhoods.

Accordingly, we are pleased that Suffolk Downs has included the HCA as part of the DEIR to further document its commitments to the City of Boston and East Boston residents.

In general, we find that the DEIR provides the necessary analyses and documentation to support the transportation element of the HCA. However, as the project proceeds through the MEPA process and ultimately through the City's Article 80 review process, we do seek clarification regarding certain information presented in the DEIR. These items are listed in the attached letter from our transportation consultant. *See Attachment A, October 11, 2013 Stantec Consulting Letter.*<sup>1</sup> Also, while the scope of this letter is limited to transportation, the City's interests and review extend beyond transportation issues. As such, a second letter is also being submitted to your office by the

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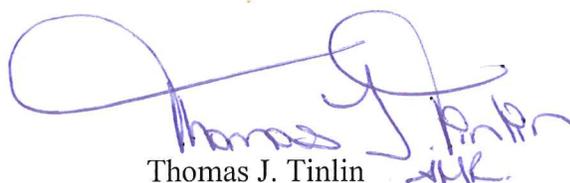
<sup>1</sup> The City of Boston has hired Stantec Consulting to assist with its review of the proposed resort development.

City commenting on non-transportation elements of the project's anticipated environmental impacts. *See Attachment B, October 11, 2013 City of Boston Environment and Energy Service Cabinet Letter.*

As noted above, a key element of the resort project is the construction of access improvements along state-owned Route 1A in the site vicinity. The DEIR has, as requested, presented an analysis of a number of alternative access plans. A "recommended" plan has yet to be identified by MassDOT and the applicant. The City of Boston's review indicates that the Route 1A Northbound Flyover plan for the project is reasonable and appropriate for the transportation plan. The analyses provided by Suffolk Downs, and reviewed by the City and its consultants, indicates that this plan will more than mitigate project related congestion impacts on Route 1A and that it can be fully built prior to opening of full gaming operations. Additionally, this concept was presented to East Boston community groups at numerous meetings over the past year as a central piece of the project. The HCA specifically calls for a flyover and added lanes and signals on Route 1A from Boardman to the Jughandle. Please see Exhibit E of the HCA for an expanded narrative description of the City's expectation of that work.

Once again we thank you for providing us with the opportunity to comment on the Caesar's Resort at Suffolk Downs DEIR. We look forward to reviewing the anticipated Final Environmental Impact Report (FEIR).

Regards,



Thomas J. Tinlin  
Commissioner  
Boston Transportation Department



**Environmental and Energy Services  
CITY OF BOSTON**

**Thomas M. Menino**  
Mayor

**Brian R. Swett**  
Chief of Environment and Energy

October 11, 2013

*Via U.S. and Electronic Mail*  
Secretary Richard K. Sullivan  
Executive Office of Energy and Environmental Affairs  
Attn: MEPA Office  
100 Cambridge Street, Suite 900  
Boston, MA 02214

**Reference: EOEEA# 15006 - Resort at Suffolk Downs**

Dear Secretary Sullivan:

The City of Boston is pleased to have the opportunity to comment on the Draft Environmental Impact Report (DEIR) submitted by Sterling Suffolk Racecourse, LLC ("Suffolk Downs") for the above referenced project. As noted in our prior correspondence, the City, specifically the Environmental and Energy Services Cabinet is committed to protecting the interests of the City, in particular City residents, relative to the resort proposal. With that in mind, the City has worked closely with the community and Suffolk Downs to fully understand the anticipated environmental and energy impacts associated with the resort, and to ensure that acceptable measures will be provided.

The City of Boston reached a Host Community Agreement (HCA) with Suffolk Downs which includes a detailed sustainability plan. This Agreement is the result of a full professional review of the project. Specifically related to sustainability, the HCA provides that:

- The Project has been designed to be one of the greenest casino development projects in the United States.
- The Project will obtain LEED Gold certification.
- The Project will result in an approximately twelve (12) acre reduction of impervious pavement and as such increase the amount of open space on the Property to approximately sixteen (16) acres.

- Suffolk Downs has committed to many other sustainability measures including water and energy conservation measures and implementing programs designed to significantly increase the percentage of customers and employees that arrive and depart from the Property via some form of transportation other than single-occupancy vehicles.

Accordingly, we are pleased that Suffolk Downs has included the HCA as part of the DEIR to further document its commitments to the City of Boston and East Boston residents.

In general, we find that the DEIR provides the necessary analyses and documentation to support the sustainability element of the HCA. However, as the project proceeds through the MEPA process and ultimately through the City's Article 80 review process, we do seek clarification regarding certain information presented in the DEIR. These items are listed in the attached memorandum from our consultant, CDM Smith. *See Attachment A, October 11, 2013, CDM Smith Memorandum.*<sup>1</sup> Also, while the scope of this letter is limited to sustainability, the City's interests and review extend beyond these matters. As such, a second letter is also being submitted to your office by the City commenting on transportation elements of the project. *See Attachment B, October 11, 2013 City of Boston Transportation Department Letter.*

Once again, we thank you for providing us with the opportunity to comment on the Resort at Suffolk Downs DEIR. We look forward to reviewing the anticipated Final Environmental Impact Report (FEIR). Please let us know if you have questions or comments.

Very truly yours,



Brian Swett  
City of Boston  
Chief of Environment and Energy Cabinet

Attachments:

- A. CDM Smith Memorandum of Comments on the DEIR
- B. City of Boston Transportation Department Comment Letter

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<sup>1</sup> The City of Boston has hired CDM Smith to assist with its review of the proposed resort development.



## Memorandum

*To: Elizabeth Dello Russo, Esq., Assistant Corporation Counsel*

*From: Jane Wheeler, Project Manager*

*Date: October 9, 2013*

*Subject: CDM Smith Comments on Suffolk Downs DEIR*

The DEIR provides additional detail on many of the ENF topics and reiterates the proponent's goal to construct and operate a world-class resort. The City offers the following comments to help achieve that goal while protecting the surrounding communities and the environment. Comments are divided into three parts:

1. Comments related to the City's overarching policies and goals listed in their March 26, 2013 ENF comment letter
2. Comments by individual topic areas
3. Comparison of the DEIR to the Host Community Agreement (HCA) signed by the City and the proponent

### 1. City's Overarching Goals

#### **Reduce energy intensity to the maximum extent possible**

- The proponent has updated, since preparation of the ENF, the GHG "baseline case" from the minimally required current Massachusetts Building Code, based on IECC 2009, to the newer IECC 2012, which will be the Massachusetts Building Code by July 2014. The State may accompany the new 2014 Building Code with a new 2014 Stretch Code. If so, this new Stretch Code would become the City of Boston's Energy Code, in effect at the time the Proponent would be seeking building permits. The first full paragraph on p. 7-19 of the DEIR notes that this next version of the Stretch Code is estimated to be a 12-15% reduction from the IECC 2012 (and 2014 Building Code). The Proponent should use this estimate for the next Stretch Code, rather than IECC 2012, as the GHG "baseline case," and then show for the GHG analysis how the proposed project would include measures beyond what would likely be required in 2014.

- Statement is made that “the proposed design is estimated to consume up to a third less energy than a development of similar size” – what is the basis for this statement?
- The proponent claims, on p. 7-19, that they will meet the new Stretch Code. They are showing, in Table 7-2, an overall 23% reduction from the IECC 2012 (Case 1 in the Table). They estimate that the Stretch Code would be 12-15% below IECC 2012. However, Table 7-2 actually shows an 11% INCREASE in energy needed for Space Heating and Domestic Hot Water over the IECC 2012 case. There may be an opportunity for additional energy savings. The proponent should explain why they aren’t meeting the Energy Code for this and why Solar Hot Water, which is typically one of the most cost-effective energy savings measures available, was rejected as a feasible GHG reduction measure.

#### **On-site alternative energy generation to the maximum extent possible**

- The City’s ENF comment letter lists 13 technologies that should be considered, but the DEIR only commits to solar photovoltaic, offsite anaerobic digestion, limited combined heat and power (producing 5% of project electricity demand, all of domestic hot water, and a portion of space heating), and purchasing green power. Section 2 of the DEIR indicates that geothermal is included, but Section 7 indicates it is not.
- We recommend that the economic feasibility of the following alternative energy measures be examined/re-examined: on-site anaerobic digestion of food waste and horse manure; incorporation of more combined heat and power (CHP) to provide building space heating; and biomass boilers. Section 7.4.2.8 dismisses onsite anaerobic digestion of wastes. The case for dismissal is primarily that the manure and horse bedding waste would be seasonal. The proponent should consider a smaller system just for food waste. The advantage of having an onsite digester (as opposed to shipping organic wastes to an offsite facility), is that the digester gas could be used at the CHP and displace natural gas use.

#### **Strive to achieve LEED Platinum status**

- The DEIR states that the project will be one of the “greenest, most sustainable casino developments in the world” but the DEIR does not support this statement. The proponent is only required and committed to achieving LEED Gold status and there are other casinos that have achieved that milestone. The City believes there are additional points that could be pursued, as described below.
- A review of the LEED checklist indicates the proponent is anticipating Gold certification with a score of 72 (Gold = 60-79) if the project achieves all credits marked YES or LIKELY. Assuming the proponent gets all 10 LIKELY credits, a minimum of 8 additional points would be needed for LEED Platinum (80+ points). Focusing on the NOT LIKELY and NO credits, the City believes there may be up to 8 to 11 additional points available to the project, as follows:

- SS Credit 4.2 for Bike storage and changing rooms - LEED allows generous exceptions for certain transient occupants for which this project would qualify. (+1 point)
- WE Credit 3 Water Use Reduction (assuming 3 out of 4 points) - While we may not be able to calculate the exact percent of water use reduction at this time, other LEED Gold casino project captured all 4 points (40% reduction). (+1 point)
- EA Credit 1 Optimize Energy Performance – This is where most of the points will be found. The proponent is proposing 5 YES and 2 LIKELY which targets about 25% better than code performance. Generally, up to 30% better than code could be achieved without engaging alternative systems, onsite energy generation and significant additional costs. The energy model would need to show this level of improvement. (max +3 points)
- EA Credit 4 Enhanced Refrigerant Management - The proponent should explain why this credit cannot be achieved. (+2 points)
- MR Credit 5.2 Regional Materials (20%) - Other LEED Gold casino achieved 43%. (+1 point)
- IEQ Credit 3.2 Construction IAQ Mgt Plan, Before Occupancy – The proponent should explain why this one is marked as NOT LIKELY. (+1point)
- IEQ Credit 4.3 Low-Emitting Materials Flooring – The proponent should have custom carpeting tested and achieve this point. Cost of testing the materials must be negligible relative to the overall project investment. (+1 point)
- IEQ 8.1 Daylight and Views - May be a difficult point to achieve, but other LEED Gold casino earned this point with skylights and clerestories. (+1 point)
- BOS 16: “proponent is striving to reduce potable water use” but credit for wastewater is not being attempted according to DEIR.
- DEIR indicates that LEED credits for Rapidly Renewable Materials and Certified Wood will not be pursued; the proponent should explain why this is the case.
- Minimal commitments and detail are given for Innovation and Design Processes credits
- FEIR should clarify whether Hotel II is included in the impact analysis and how a different developer and tenants will be held to commitments.

**Conserve, maximize efficiency and reuse water to the greatest extent possible**

- While the project does include rainwater collection and use for landscape irrigation, track watering and cooling tower water demand, it does not include a system to reuse wastewater on site.

### **Maximize TDM opportunities for all guests and staff**

- Existing and future bicycle/pedestrian connectivity on and off the site are not discussed in sufficient detail.
  - Section 5.2.2 – Very general discussion of existing pedestrian infrastructure in the vicinity, but some detailed pedestrian count data in Attachment A. No table or figure summarizing existing and proposed pedestrian infrastructure, however detailed bullet list of pedestrian improvements in Section 5.8.2.
  - Section 5.2.3- Good discussion of existing bicycle infrastructure south of the site in East Boston, but no discussion as to whether Revere does or does not have existing infrastructure. Figure 5-5 also shows existing and proposed bicycle infrastructure and Section 5.8.3 provides detailed discussion of proposed improvements.
- Bicycle and pedestrian levels of service are not discussed and should be addressed in the FEIR.
- While the DEIR lists many of the TDM measures recommended by MassDEP, it fails to describe what the measures entail or how they will be implemented (e.g., “provide transit incentives to patrons;” “provide incentives for non-auto commuters”). The following TDM measures are not specifically addressed in the DEIR:
  - No mention of market incentives to explicitly encourage charter bus use, but does plan for a HOV Shuttle Plan to accommodate private bus users – still no mention of market incentives to explicitly encourage charter bus use.
  - No mention of charging market price for parking spaces for SOV.
  - No mention of parking cash out incentives for employees, but TDM subsidizes transit passes and mentions “other incentives.”
  - No mention of unbundling hotel guest parking fees from accommodation rates in the TDM.
  - No specific mention of shared parking per se, but satellite parking facilities and off-site shuttle service are called for in the TDM as well as providing parking spaces for a car-sharing entity such as Zipcar, subject to demand (page 5-142).
- Is a shared bicycle/pedestrian path from the Suffolk Downs MBTA station appropriate given the projected level of pedestrian usage?
- Shuttle service appears extensive but also very “flexible”, i.e. not defined (1-12). Are air quality and congestion implications sufficiently quantified? An employee shuttle program is further discussed

in Section 5.10.3, but no specific parking locations listed although shuttle program will operate 24 hours a day, 7 days a week.

## 2. Comments by Individual Topic Areas

### **General**

- FEIR should clarify whether Hotel II is included in the impact analyses for all parameters and how a different developer and tenants will be held to proponent commitments.

### **Stormwater/Surface Water**

- DEIR should confirm that the proposed elevating of Tomasello Drive does not result in the severing of any surface water flow paths.
- DEIR dismisses providing additional protection to prevent exposure to the adjacent tank farms or the onsite landfill in a flooding event (DEIR includes a statement that the onsite landfill is below ground and therefore not vulnerable). The proponent should confirm that the tank farms are adequately protected, accounting for sea level rise and storm surge.
- BOS 13 response is "All stormwater generated by the site will be collected, treated, and ultimately discharged to either Sales Creek or on-site wetlands systems. There will be no direct discharges to adjacent properties..." Although pre- and post-peak rates of runoff are provided for various storms, there is no indication of design storms used for stormwater management. If collection systems are designed for a 10-year 24-hour storm, will the systems overflow to adjacent properties during larger storms? Does this response mean that the site will be sufficiently graded toward stormwater management facilities?
- BWSC 13 states that all stormwater will be retained on site, which is not possible during storms larger than design storms.
- Soils on site are fill consisting of poorly graded sand and silty sand, with groundwater 2.5 to 7 feet below surface. There should be at least a 2 foot separation between bottoms of porous pavement beds (planned to be at least 2.5 feet deep) and bioretention soils to provide the treatment claimed in the document. How much of the site has groundwater only 2.5 feet down? Permeability tests should also be done where infiltration is planned.
- Very large rainwater harvesting systems are planned. What is the total roof area used and what is the total lawn area? Will there be a sufficient irrigation demand so that the tanks will actually empty and be effective for stormwater management, or will they just overflow during storm events because they will be full?

### **Air Quality**

- Section 1.10 points out that the Revere and East Boston neighborhoods adjacent to the site are Environmental Justice (EJ) communities, and that two mandatory thresholds for an EIR are exceeded by the proposed project. As stated in Section 1.10.3, the EEA's EJ Policy requires an "enhanced EIR analysis of impacts and mitigation." The EEA EJ policy further states that, "Enhanced analysis of impacts and mitigation may include analysis of multiple air impacts; data on baseline public health conditions within the affected EJ Population; analysis of technological, site planning, and operational alternatives to reduce impacts; and proposed on-site and off-site mitigation measures to reduce impacts and increase environmental benefits for the affected EJ Population."

The Air Quality analysis should include an enhanced review of air emissions, as they affect the East Boston Orient Heights neighborhood. Specifically, this analysis should include dispersion modeling of PM<sub>2.5</sub> emissions (in addition to the CO emissions modeled) from the worst-case intersections and roadways already considered, which should be added to PM<sub>2.5</sub> emissions from onsite buses idling and starting up in the parking lots and drop-off areas. PM<sub>2.5</sub> monitoring data should be presented from Massport's Logan Airside Improvements Project Air Monitoring Study and be used as background concentrations to be added to the dispersion modeling results. The difference in modeled PM<sub>2.5</sub> concentrations between the No-Build and Preferred Alternative Cases should be quantified, as well as the reductions due to the proposed transportation improvement measures. If these measures do not completely mitigate any increases from the Project, additional mitigation measures should be identified. Since the construction period would be over two years, dispersion modeling should be conducted to determine if the MAAQS/NAAQS for PM<sub>2.5</sub> could be exceeded at the property boundary due to both equipment and fugitive dust emissions. Mitigation measures to reduce these emissions should be proposed, if so.

- Add a discussion of federal attainment designations.
- Table 6-3 shows the Ozone MAAQS (310 CMR 6.00) of 235 ug/m<sup>3</sup>, but not the federal NAAQS of 147 ug/m<sup>3</sup>.
- MOBILE6.2 has been replaced by the MOVES model (specifically MOVES2010b) as the U.S. EPA's official model for criteria air pollutant and greenhouse gas emissions from roadway vehicles. MOVES has been available for three years. The U.S. EPA's grace period for allowing MOBILE6.2 for project-level conformity determinations expired on December 20, 2012. Although this project is not required to perform a formal conformity determination, the latest U.S. EPA model should be used for the emissions modeling.
- It is not clear whether the daily emissions in Tables 6-5 and 6-6 are for weekday emissions or for weekend emissions. If the peak day traffic for the project is a weekend day, this should be the basis for the analysis.
- The stationary source modeling does not include CO and PM<sub>2.5</sub> emissions from the parking garage. The Noise section states that the parking garage would be naturally ventilated. Section 6.5.7.4

suggests that some ventilation and exhausts may be necessary for lower garage levels. Even if the parking garage does not have stacks, it would be a large volume source of air pollutant emissions on the site, and it should be included in the air dispersion modeling.

- Section 6.5.5.1 states that even though the project would cause an increase in regional NO<sub>x</sub> and VOC emissions over the No-Build case, implementation of the Host Community Agreement's proposed traffic improvement measures would cause a reduction of these emissions. This reduction should be quantified.
- Discuss how the predicted mesoscale results (e.g., 8.3% increase in NO<sub>x</sub> emissions due to the Project) would affect the MA SIP and local air quality (as described in Section 6.5.3.1).
- Section 6.5.8 discusses General Air Quality Mitigation measures for idling of taxis and buses. The proponent should quantify the diesel PM and PM<sub>2.5</sub> total emission rates from the buses idling five minutes per trip, plus start-up and moving emissions, for an upper-bound estimate of the bus traffic expected to use the South Parking Area. These PM<sub>2.5</sub> emission rates should be used in the dispersion modeling and impact analysis.

#### **Noise**

- The definition of traffic noise impact should be clarified (i.e. approaching/exceeding Noise Abatement Criteria (NAC) and substantial increase due to project).
- There is no discussion of weekend vs. weekday background noise levels.
- Comment BOS 65 – It does not appear that bus activity in the South Parking Area was assessed. Please include modeling of noise from 24-hour bus activity in this Area, and add this to the results for the Orient Heights neighborhood receptors. If noise from this source could be annoying (approximately a 5-dBA increase over L<sub>90</sub> levels) between 7:00 p.m. and 6:00 a.m., this bus drop-off location should be moved from the South Plaza to the North Plaza entrance.
- Table 6-23b shows nighttime noise level increases at receptors R6 and R7 to be 5 dBA. Although below the MassDEP noise policy criterion of a 10-dBA increase, any increase over 3 dBA would be noticeable, and a 5-dBA increase is potentially annoying. Noise levels that are approaching (one decibel below the NAC) or exceeding the NAC are considered an impact for residential and commercial developments. Table 6-27 shows receptors R4, R8 and R9 are potentially affected. Specific mitigation measures should be identified for all of these receptor locations.
- The construction noise analysis uses a construction schedule of 20 months. The construction noise analysis use the full construction schedule. Add quantitative examples of mitigation measures that would reduce the construction noise levels (i.e. the 80 dBA case) down to below the city limit to

respond to Comment BOS 66. Would stationary, mobile, and construction noise sources from Alternatives 1 and 2 be similar to those for the Preferred Alternative?

#### **Construction Air Quality and Noise**

- Specific mitigation measures identified by the City were not incorporated—only discussed in general terms.

#### **Greenhouse Gas Analysis**

- Because the analysis only focuses on CO<sub>2</sub> emissions, and does not include methane, a powerful greenhouse gas, evaluation of methane emissions from horse manure management, and opportunities to reduce those emissions, have been overlooked. Please discuss whether or not manure would be collected and sent to the proposed off-site anaerobic digester.
- Section 7.2.6.3 states that the gaming machines themselves consume a large percentage of the total electricity of the project. This percentage is not quantified. The alternative to use more efficient gaming machines is discussed briefly, but not quantified, evaluated, or included as part of the project. The MEPA GHG Policy requires that the GHG reduction of mitigation measures NOT selected be presented. This information has not been included in Section 7.4.

#### **Section 61 Findings**

- Section 61 Findings are lacking information on mitigation responsibilities and costs.

#### **Urban Design**

- The proponent should provide an analysis of whether the flyover detracts from establishing “linkages with existing” attractions and businesses.
- Street-level retail will have operable doors, but it does not appear that entrances are located on the street (4-6).

### **3. Comparison of the DEIR to the HCA**

Although the City of Boston’s Host Community Agreement provides many requirements for sustainable construction and operation in some cases the DEIR was found to be inconsistent with the City’s agreement. It is expected that in the FEIR these inconsistencies, including but not limited to those outlined within this section be revised so as to fully comply if not exceed the requirements of that agreement:

- HCA says overall potable water use savings will be 35% above calculated baseline; DEIR says at least 30% (p. 2-10)

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- HCA says minimum of \$45M in roadway improvements; DEIR says \$42-50M (p. 1-16)
- HCA includes a draft Construction Management Plan – updated version should be included in FEIR
- While the HCA references an approximately 12 acre reduction in impervious surface; encouragingly the DEIR indicates a reduction by 14 acres.



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**Stantec**

October 10, 2013

Ms. Elizabeth Dello Russo  
City of Boston Law Department  
City of Boston  
City Hall, Room 615  
Boston, MA 02201

**Reference: Draft EIR  
Resort at Suffolk Downs**

Dear Ms. Dello Russo:

Per your request we have reviewed the transportation component of the Draft Environmental Impact Report (DEIR) dated September 3, 2013 for the above referenced project. In general, we find the DEIR to be responsive to the comments the City submitted on the Environmental Notification Form for the project. However, there are several areas of analysis where clarification or additional detail should be provided as part of future submissions. These are described below and presented sequentially as they appear in the DEIR.

#### Interim Traffic and Parking Conditions (Section 1.11.1)

The proposed casino resort will be constructed in a single, continuous phase per the applicant. However, the DEIR explains that the proposed casino/gaming area within the existing Suffolk Downs grandstand will open prior to other elements of the project and prior to completion of proposed improvements along Route 1A. The applicant should provide an analysis of expected site traffic generation and local area (along Route 1A in the immediate site vicinity and at the Tomasello Drive/Route 145 intersection) traffic operations for this interim period when just the grandstand gaming area is operational. Similarly, a parking plan should be provided comparing the expected on-site parking demand during this interim period to the parking supply that will be available. The Host Community Agreement for the City of Boston requires that adequate parking be provided throughout this period. Enhanced details should be provided to describe how adequate parking will be provided throughout the early opening period.

#### Orient Heights Pedestrian Connection (Section 4.4.7)

The DEIR commits to maintaining a safe and convenient pedestrian connection across the site between the Orient Heights neighborhood and the Target shopping plaza. Figure 1-35 of the DEIR indicates the location of proposed on-site pedestrian connections but does not show the Orient Heights connection. Details of this proposed connection need to be defined.

#### Trip Generation (DEIR Section 5.4.3)

As directed by MassDOT, the applicant conducted traffic counts at three other existing casino resorts and then computed trip generation rates for these existing facilities on a "vehicle trips per gaming position" basis. However, the DEIR does not appear use this data except in the report appendix. The trip generation

forecasts included in the DEIR are principally the same as those presented in earlier draft documents based on Caesars expectations regarding the hourly distribution of patron visits, vehicle occupancy rates and mode choice. Table 5-19 of the DEIR anticipates 1869 Friday PM peak hour vehicle trips. The DEIR appendix cites a trip rate of 0.40 vehicle trips per gaming position at other facilities for the Friday PM peak hour. Based on 6000 gaming positions proposed at Suffolk Downs the appendix predicts 2400 Friday PM peak hour vehicle trips. The discrepancy between these two figures, and similar discrepancies for the Saturday peak traffic hour, should be explained.

#### Access Alternatives (Section 5.5)

The DEIR presents analyses of several alternative site access plans. The plans vary in terms of the scope of improvements proposed along Route 1A in the site vicinity. Information provided for the alternatives includes but is not limited to: expected intersection operating levels of service with the improvements in place; time required to construct the improvements; and, construction cost. However, the type of information presented for each alternative is not consistent and it is not presented in a manner that allows for a side-by-side comparison of alternatives. To the extent that MassDOT has not yet selected a recommended alternative and seeks further public comment on the alternatives, we suggest that the analysis results be shown in a matrix format. The operations analysis section of the matrix should also include a systems analysis of Route 1A. Travel delays through the entire Route 1A section within the improvement area should be determined considering the interactions of multiple, closely spaced traffic signals.

#### MBTA Improvement Schedule (Section 5.8.1)

Related to the interim operating conditions, information should be provided regarding the expected construction schedule for the MBTA Suffolk Downs station upgrades. Encouraging the use of public transportation for site access is a key element of the resort's transportation plan. Accordingly, first time visitors using public transportation for site access should have a positive experience so that they will again choose to use public transportation for future visits. Proposed improvements to the Suffolk Downs station should be completed, if possible, prior to the opening of the grandstand gaming area to ensure (a) ease of travel for the neighborhood residents, and (b) that first time visitors have a welcoming transit experience.

#### Building Occupancy (Section 5.8.3.2)

Within the Alternative Travel Modes section of the DEIR is a proposal to provide 100 bike parking spaces on the site. The City supports the use of alternative modes of travel, and providing bike parking spaces on the site is positive for patrons, visitors and the neighborhood. However, there are discrepancies regarding the site population assumed in the bike storage, traffic and parking analyses. We suggest that these discrepancies be further explained.

#### Visitor Parking Analysis (Section 5.10.2)

The adequacy of the proposed parking supply was analyzed in the DEIR based on the expected hourly arrival pattern of resort patrons and an assumed duration of stay of three hours per visitor. While this approach is reasonable, there is no documentation provided to support the arrival pattern or duration of stay assumptions. (If the actual duration of stay is four hours rather than three hours then presumably the peak parking demand increases by 33 percent and conclusions reached regarding the adequacy of the parking supply may

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change.) It is also unclear as to how hotel parking demands are considered in the analysis. The duration of stay for hotel guests and their vehicles will be much longer than three hours. Spaces needed for hotel parking and employees should perhaps be considered separately in the analysis. Comparisons to industry standard parking rates and/or measured parking demands at comparable facilities should be used to validate the applicant's parking analysis methodology.

### Employee Parking (Section 5.10.3)

The DEIR indicates that a contractor will be hired to manage resort employee parking demands. The suggestion is made that employees may be directed to park at remote parking lots where shuttle buses will pick them up and convey them to the site. This strategy raises two concerns that should be addressed by the applicant. First, will this be a cost-effective solution for employees, as the remote parking facilities may charge daily parking fees. If employees must pay to park at these locations and then wait for a shuttle bus ride to the site they might seek less expensive and more convenient parking on surrounding streets. Second, many remote parking facilities used by commuters traveling to/from Boston presently operate at or near capacity. We want to ensure that casino employees be able to find parking at facilities and not disproportionately displace existing commuters using these facilities.

### Tomasello Drive/Furlong Drive Intersection

Furlong Drive in Revere, passing through the existing Target shopping center offers a third point of vehicular access to the project site. Its existing intersection with Tomasello Drive is under Stop sign control. We suggest a further level of analysis than that offered in the DEIR, to determine if improvements are warranted at this location as a consequence of the vehicular and pedestrian traffic volumes the resort will add to this intersection.

As noted, the above comments relate to our review of the DEIR for the Suffolk Downs proposal. Additional comments may be generated as the project moves through the City review process. Please do not hesitate to contact us if you have any questions regarding the above.

Regards,

**STANTEC CONSULTING SERVICES INC.**



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# Attachment B