



EAST BOSTON



Spotlight on the

SUFFOLK DOWNS RESORT TRANSPORTATION PROPOSAL

AS REVIEWED BY THE BOSTON TRANSPORTATION DEPARTMENT



For the proposal, please go to:

 www.CityofBoston.Gov/Gaming

 (617) 635-4500

 HCAC@CityofBoston.Gov

Spotlight on Transportation

BELOW ARE A SERIES OF RECOMMENDATIONS FROM THE EXPERT ANALYSIS LED BY BTD:



Vehicle Traffic

- Require adequate capacity on roads, particularly Route 1A, to handle increased travel demand during and after construction.
- Prevent spill-over onto neighborhood streets.
- Evaluate traffic impact on 11 different intersections within East Boston.

Parking

- Manage parking demands and supply to ensure that patrons and employees do not park on East Boston streets, including during construction.
- Locate on-site bus staging areas to avoid neighborhood impact.

Pedestrian/Bicycle

- Incorporate pedestrian and cyclist-friendly design elements into off-site infrastructure improvements.
- Improve pedestrian/bicycle connections to the resort.

MBTA Subway and Bus

- Identify necessary service improvements to meet added demand.
- Evaluate adequacy of MBTA stations and propose upgrades.
- Assess and relieve impacts on MBTA parking facilities.

Water

- Enhance water transportation connections to Downtown Boston and the Boston Harbor Islands.
- Identify casino/pier shuttle bus routes to promote East Boston businesses.
- Consideration of water transport during casino construction.



Hablando de Transportación

A CONTINUACIÓN SE PRESENTA UNA SERIE DE RECOMENDACIONES SOBRE EL ANÁLISIS

EXHAUSTIVO GENERADO POR LA BTD:



Tráfico de Vehículos

- Requerir capacidad adecuada en las carreteras, particularmente en la Ruta 1A, para administrar la demanda en el aumento del tráfico vehicular durante y después de la construcción.
- Prevenir desbordamiento en las calles del vecindario.
- Evaluar el impacto del tráfico en 11 intersecciones distintas a través de East Boston.

Estacionamiento

- Manejar la demanda y disponibilidad de estacionamiento para asegurar que los clientes y los empleados no se estacionen en las calles de East Boston, incluso durante la construcción.
- Localizar áreas designadas para autobuses con el propósito de evitar el impacto al vecindario.

Peatones/Bicicletas

- Incorporar elementos al diseño para mejorar la infraestructura en las áreas peatonales y las vías ciclísticas fuera del complejo.
- Mejorar las conexiones del complejo a las áreas peatonales y las vías ciclísticas.

Subway y Autobuses de la MBTA

- Identificar mejoras en los servicios necesarios para satisfacer la demanda agregada.
- Evaluar la suficiencia de las estaciones de la MBTA y proponer mejoras.
- Evaluar y aliviar los impactos en las facilidades de estacionamiento de la MBTA.

Transporte Marítimo

- Mejorar las conexiones del transporte marítimo hacia el centro de Boston y a las islas del puerto de Boston.
- Identificar rutas de autobús del casino/muelle para promover los negocios de East Boston.
- Considerar el transporte marítimo durante la construcción del casino.





HOST COMMUNITY ADVISORY COMMITTEE

City Hall, Room 615 Boston MA 02201

Brian Leary, *Chairman*
Sarah Barnat
Lisa Calise
David Fubini
Ronald L. Walker II

March 20, 2013

Dear East Boston Community:

The Host Community Advisory Committee would like to share with you some of the City's assessments and recommendations of the environmental review of the proposed development at Suffolk Downs. In January Suffolk Downs submitted an Environmental Notification Form to the state. This is an important step in the process of reviewing the development, and ensuring that the development works for the community. The City has assembled a specialized team of City officials, independent consultants and subject matter experts to review this filing and the overall development. Included below are a series of requests and recommendations related to the environmental filing that the City is analyzing. We encourage the state to also consider them in its environmental review process.

The City and the community agree that traffic and transportation are a priority. With that in mind, the City is applying the highest standards to the developer's transportation plans, and asks that state do the same. The City has requested, and we recommend that the state also request from the developer:

- A detailed impact assessment and recommendations to protect the community from any potential impact;
- A detailed analysis of vehicular, pedestrian, bicycle and boat access connections to the site;
- An analysis on the MBTA, including availability of service and station improvements;
- An overall comprehensive parking study; and
- A detailed construction management and demand management plan.

As a leader in environmental sustainability and energy efficiency, the City is encouraged by Suffolk Downs' pledge for a particularly green development, including new plans to reduce pavement by 30% and transform current asphalt in to natural landscape. At the same time, the City has very high environmental standards. Therefore, the City asks that the state also request from the developer environmental material and studies in many areas, including the following:

- Detailed consideration of energy and water conservation and alternative energy measures;
- Use of sustainable building materials;
- Detailed evaluation of local and regional air quality impacts, and information on soil and hazardous materials;
- Information on stormwater management, sea level rise, and storm surge preparedness.
- In all of these areas, the City suggests that the developer consider impacts for the construction period as well as future effects.

Finally, we want to reiterate that the City's critique of the Environmental Notification Form is one of many reviews of the overall development, all of which are improved by community engagement and feedback. We look forward to continuing to work with the community and the state throughout this process.

Sincerely,

Elizabeth Dello Russo, Esquire

Executive Director, Host Community Advisory Committee



COMITÉ ASESOR DE LA COMUNIDAD (HCAC)

City Hall, Room 615 Boston MA 02201

Brian Leary, *Chairman*
Sarah Barnat
Lisa Calise
David Fubini
Ronald L. Walker II

20 de Marzo de 2013

Estimada Comunidad de East Boston:

El Comité Asesor Comunitario (HCAC, por sus siglas en inglés) quisiera compartir con ustedes algunas de las evaluaciones y recomendaciones por parte de la Ciudad con respecto a la evaluación medioambiental del proyecto de desarrollo propuesto por Suffolk Downs. En enero, Suffolk Downs sometió un Formulario de Notificación Ambiental al Estado. Este es un paso importante en el proceso de revisión para asegurar que las obras del proyecto de desarrollo funcionen para la comunidad. La Ciudad ha formado un equipo especializado de funcionarios municipales, consultores independientes y expertos en la materia para revisar esta presentación y el desarrollo de este proyecto. A continuación les estamos incluyendo una serie de peticiones y recomendaciones relacionadas con la sumisión de medio ambiente que la Ciudad está analizando. Alentamos al estado a que también consideren en su proceso de revisión los asuntos pertinentes sobre el medioambiente.

La Ciudad y la Comunidad coincidimos que el tráfico y la transportación son una prioridad. Teniendo esto en mente, la Ciudad está aplicando los más altos estándares para los planes de transportación del desarrollador, y pide que el estado haga lo mismo. La Ciudad ha solicitado, y recomendamos que el Estado también solicite del desarrollador:

- Una evaluación detallada y recomendaciones para proteger a la comunidad contra cualquier posible impacto;
- Un análisis detallado sobre como conectar el acceso de vehículos, peatones, bicicletas y barcos al local;
- Un análisis de la MBTA, incluyendo el servicio disponible y las mejoras a la estación;
- Un estudio exhaustivo sobre el estacionamiento para vehículos; y
- Un plan detallado sobre el manejo gerencial de la construcción y la demanda de este plan.

Siendo un líder en la sostenibilidad ambiental y la eficiencia de la energía, la Ciudad se siente conforme con el compromiso de Suffolk Downs para desarrollar un proyecto verde, incluyendo nuevos planes para reducir el pavimento por 30% y transformar el asfalto en un paisaje natural. Por lo tanto, la Ciudad le pide al Estado que además solicite el uso de materiales medioambientales y estudios en varias áreas, incluyendo las siguientes:

- La consideración detallada para la conservación de energía, el agua y los medios alternativos de energía;
- El uso de materiales de construcción sostenibles;
- Una evaluación detallada sobre el impacto a la calidad del aire local y regional, así como información sobre el terreno y materiales riesgosos;
- Información sobre el manejo de las aguas pluviales, el ascenso del nivel del mar y las preparaciones en caso de posible marejadas.
- La Ciudad sugiere que el desarrollador considere los impactos para todas estas áreas, durante el período de construcción al igual que los posibles efectos potenciales en el futuro.

Por último, queremos reiterar que la revisión crítica del Formulario de Notificación Ambiental por parte de la Ciudad es una de muchas revisiones sobre el desarrollo del proyecto en general, la cual va mejorando mediante la participación y opinión que recibimos de la comunidad. Esperamos continuar nuestra labor con la comunidad y el estado a lo largo de este proceso.

Atentamente,

Elizabeth Dello Russo, Esquire
Executive Director, Host Community Advisory Committee



BOSTON
TRANSPORTATION
DEPARTMENT

March 26, 2013

ONE CITY HALL PLAZA/ROOM 721
BOSTON, MASSACHUSETTS 02201
(617) 635-4680/FAX (617) 635-4295

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 Environmental Notification Form (ENF) submitted by Sterling Suffolk Racecourse, LLC ("Suffolk") for the above referenced project. The City, and specifically the Boston Transportation Department (BTD), is committed to protecting the transportation interests of the City of Boston relative to the resort proposal. The City and the community agree that traffic and transportation are a priority. With that in mind, the City is applying the highest standards to the developer's transportation plans, and asks that the state do the same. Many community members have concerns about transportation impacts from the proposed development. We understand that these concerns include but are not limited to assurances that:

- Mobility will not be degraded on roadways in the site environs;
- Sufficient capacity and improvements will be available on the MBTA Blue Line and area bus routes to meet resident and resort needs;
- Resort patrons and employees will not be parking on City streets in the East Boston neighborhood;
- Proposed transportation analysis and planning addresses all modes – automobile, transit, pedestrian, bicycle and water; and,

THOMAS M. MENINO, Mayor
Thomas J. Tinlin, Commissioner



- Adequate measures will be employed to mitigate construction impacts.

Accordingly, we view the MEPA (Massachusetts Environmental Policy Act) review process as a valuable complement to the City of Boston's own project review process and an important means to address the concerns of the community.

While the scope of this letter is limited to transportation, the City's interests and review extend well beyond transportation issues. As such, a second letter is also being submitted to your office by the City commenting on non-transportation elements of the project's anticipated environmental impacts. See *Attachment A, March 26, 2013 City of Boston Environment and Energy Service Cabinet Letter*. Likewise, this letter does not encompass all of the City's transportation review of this project, much of which is happening at a local level. In an effort to share with your office the scope of the City's transportation review, attached please find a separate gap analysis letter that the City has sent to the proponent. See *Attachment B, March 22, 2013 Stantec Consulting Letter*.¹ The supplemental information filed with the ENF is informative in describing the project and its potential environmental impacts. Receipt of these materials has enabled the City to informally initiate its own project review process. Under the City's own review process the City will fully consider site plan and roadway impacts within our jurisdiction. However, through the MEPA process we seek to understand potential project impacts, and perhaps influence decisions, regarding transportation facilities and services in the City that are under state jurisdiction.

A. Importance of Route 1A and the MBTA

The City has specific transportation concerns that relate to State Route 1A and Massachusetts Bay Transportation Authority (MBTA) operations and facilities. Suffolk's preliminary transportation analysis notes the importance of Route 1A and the MBTA in providing safe and efficient access to the subject site. The analysis estimates that ten percent (10%) of the patron trips and thirty-five percent (35%) of the employee trips will be made by public transportation. Of the estimated 24,600 daily vehicle trips generated to/from the site, eighty-two percent (82%) are expected to use Route 1A, with approximately seventy percent (70%) oriented to the south of downtown Boston. The City is seeking assurances through the MEPA process that Route 1A and the MBTA have adequate capacity to handle these increased travel demands, and to prevent any excess demand spill-over onto City streets. Several City roadway intersections, as indicated in Suffolk's preliminary traffic investigations, are already operating at or near capacity and cannot readily accommodate increased traffic volumes. Therefore, the City asks that the state request from the proponent a detailed impact assessment and recommendations to protect the community from any potential impact, particularly related to Route 1A and the MBTA.

B. Route 1A

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

We look forward to the submission of a Draft Environmental Impact Report (DEIR) by Suffolk that includes a transportation study prepared in full conformance with the *EOEEA/MassDOT Guidelines for EIR/EIS Traffic Impact Assessment (the Guidelines)*. We ask that the study include all of the intersections listed in Attachment A/Section 3.2.6 (Proposed Study Area) of the ENF plus the following intersections:

- Route 1A/Curtis Street
- Saratoga Street/Neptune Road
- Bremen Street/Neptune Road

The other study area intersections in the City of Boston, per ENF Attachment A/Section 3.2.6, we understand to include:

- Route 1A at Jughandle/Tank Farm Access
- Route 1A at Tomasello Drive (Suffolk Downs)
- Route 1A Northbound at Waldemar Avenue
- Route 1A at Boardman Street
- Bennington Street at Saratoga Street
- Bennington Street at Neptune Road
- Neptune Road at Route 1A Northbound Off-ramp
- Boardman Street at Saratoga Street

Additional intersections are to be considered in the City of Revere.

Consistent with the *Guidelines*, we would expect the DEIR to describe existing and anticipated future transportation conditions to at least the level of detail provided in the preliminary study with more specific and more firm commitments to transportation mitigation. Likewise, we expect Suffolk to address in the DEIR, and/or at the City level as appropriate, the issues raised in the attached “gap analysis” letter (Attachment B) prepared by the City’s transportation consultant for this project.

Due to certain unique elements of the project we ask that the EOEEA require Suffolk to include analyses which may not be specifically identified in the *Guidelines*. First, we ask that a “post-build” analysis be completed for at least Route 1A in the site vicinity. We understand that inclusion of a post-build analysis is typical of traffic studies conducted for gaming resorts that are subject to federal review. Federal reviewers recognize that the introduction of gaming to an

area tends to attract additional “induced” development that will further increase travel demands after the gaming resort is built. In this case individual “induced development” projects may not be subject to MEPA review due to their size and/or location yet the cumulative impact of this type of development could have significant impacts on Route 1A traffic operations. Given the scope, cost and construction duration of improvements suggested by Suffolk for Route 1A, the northbound flyover at Boardman Street, decision-making regarding the Route 1A plan should look beyond the typical five-year time horizon considered in the *Guidelines*. It is standard practice for MassDOT to require preparation of a Functional Design Report (FDR) for a roadway project of this scale. Perhaps the FDR traffic analysis could be included in the DEIR as the “post-build” analysis. Second, we ask that the DEIR include an alternatives analysis for the suggested Route 1A improvements. Again, given the scale and cost of the suggested improvements, whatever is built for the proposed resort is likely to remain in place for many years. We ask that alternative Route 1A treatments be presented in the DEIR and evaluated in a matrix format describing as appropriate:

- AM and PM peak hour traffic operations (level of service and volume-to-capacity ratio) for Route 1A intersections with Boardman Street, Tomasello Drive, Waldemar Avenue and the U-Turn/Tank Farm Access;
- Construction costs;
- Construction time period;
- Land acquisition requirements (number of parcels, number of property owners, total acreage, estimated land value); and,
- Pedestrian and bike accommodations and “pedestrian friendliness,” (wider roads will make crossing Route 1A more difficult and/or dictate the need for grade separated crossings).

Supporting traffic flow networks, traffic operations analysis worksheets, cost estimate worksheets, construction phasing plans and preliminary taking plans may also be provided in the DEIR appendix to support the evaluation matrix.

C. MBTA

The City asks that a detailed impact analysis is done regarding the MBTA subway and bus line sites and services. The City would like the DEIR to consider project impacts on MBTA line capacities, including availability of service and station improvements. Many East Boston residents, businesses, patrons and visitors depend on these services. A detailed impact assessment is needed to protect and enhance the community from any potential impact. The City recommends that an MBTA analysis include review of shift times for employees at the resort, as well as capacity during rush hours, weekends and nighttime service.

We also ask that in addition to considering project impacts on MBTA line capacities, that the DEIR also analyze the capacity of MBTA parking facilities serving the Blue Line. Presumably, the DEIR will look at peak load factors for Blue Line trains and MBTA buses serving the project site to determine if adequate capacity is available to carry resort-generated riders. Ideally, most of the new riders to the resort will access the MBTA system as pedestrians entering the system by way of downtown subway stations or boarding MBTA buses near their homes. However, employees approaching from communities located north of the project site may choose to park at Wonderland or Beachmont stations, particularly if employee parking on site is limited as part of the project's Travel Demand Management plan. The ability of these stations to handle increased parking demands should be considered.

D. Parking

Also, and related to the above comment, is a request that Suffolk provide a comprehensive parking analysis and parking management plan in the DEIR for both the construction period as well as after opening. On-street parking along City streets proximate to Suffolk Downs in the Orient Heights neighborhood should be available to East Boston residents and their guests under both construction conditions and future conditions with the resort built. However, competition for these spaces will occur if adequate parking is not provided by the resort to meet typical and peak resort parking needs. The DEIR should analyze typical weekend and special event parking demands. Gaming activity and related parking demand are expected to peak on weekend evenings. Special events, such as live performances, conferences, and high-stakes horse racing, may add to weekend peaks and/or create peaks at others times. A plan should be provided to ensure that resort-related parking demands will be met in resort-controlled parking facilities at all times and not on neighborhood streets.

E. Water

The ENF does discuss the possibility of using water transportation to alleviate roadway congestion, which the City of Boston is assessing and encourages. The City is requesting the proponent look at how the project can tie in to the water transportation network to downtown Boston and the Boston Harbor Islands national park. In addition to considering water transport during casino operations, the City has asked the proponent to evaluate the possibility of using water transport during project construction for construction materials and construction workers.

F. Construction Management Plan

Finally, as the project advances, the proponent will be required to develop and submit a detailed Construction Management Plan (CMP) to the Boston Transportation Department (BTD) for review and approval. The CMP will address Traffic Demand Management measures for construction workers, proposed truck routes and hours, street occupancies, equipment staging, sidewalk relocations and hours of construction work.

Once again we thank you for providing us with the opportunity to comment on the Caesar's Resort at Suffolk Downs ENF. We look forward to reviewing the anticipated DEIR.

Regards,



Thomas J. Tinlin
Commissioner
Boston Transportation Department



Stantec Consulting Services Inc.
55 Green Mountain Drive
South Burlington VT 05403
Tel: (802) 864-0223
Fax: (802) 864-0165

Stantec

March 22, 2013

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

Reference: The Resort at Suffolk Downs

Dear Ms. Dello Russo:

Per your request we are reissuing our "gap analysis" letter of December 17, 2012 for use as an attachment to the City's comment letter on the Environmental Notification Form filed with the state regarding the above project. On January 7, 2013 VHB issued a response to the December 17, 2012 letter on behalf of the project proponent. In its letter VHB noted that many of the issues raised in the gap analysis would be more fully addressed in the Draft Environmental Impact Report (DEIR) to be filed with the state. The issues for which the City should expect to see more information in the DEIR are listed below. The listed items are generally the same as included in the December 17, 2012 letter except that some comments have been consolidated and all have been grouped by subject matter.

Study Scope

The traffic study area should be expanded to include the following locations:

1. The full Bennington Street/Route 1A interchange area to also include the closely-spaced Saratoga Street, Bremen Street and Chelsea Street intersections with Neptune Road. The Bennington Street/Neptune Road intersection is presently part of the study area.
2. Additional intersections along Bennington Street between Neptune Road and Saratoga Street as necessary to fully understand the potential impact of a proposed bike lane on Bennington Street and to understand opportunities to enhance traffic signal coordination and control along this corridor.
3. The Route 1A southbound intersections with the southbound on ramp from Route 145 and with Curtis Street. These "K-type" intersections are subject to some unique and potentially unsafe queuing and merge conditions that warrant a safety analysis.

The traffic study scope should also be expanded into the following areas:

4. FHWA Permits: Identify any applicable Federal permit or review requirements associated with proposed off-site transportation system improvements. Explain how these requirements will be met.

5. Construction Management: Provide a construction management plan for the proposed development as well as proposed off-site transportation system improvements. Provide a traffic management plan to address traffic impacts associated with construction of off-site transportation system improvements.

Study Assumptions

Certain assumptions used in the traffic analysis should be verified or revised as noted below.

1. Provide the source data used as the basis of the trip generation estimates for the project. It is understood that only one active urban casino resort was counted in developing trip generation rates for the project. Data should be provided for additional locations.
2. Source data used to develop the mode split for project related trips should be provided. Obtain and present relevant data for the existing race track to help define existing trip distribution and mode choice patterns for patrons and guests.
3. Historic traffic volume data for study area roadways, particularly Route 1A, should be provided. Data for pre-recession (2007 and earlier) traffic conditions is specifically requested. Many areas have seen traffic declines since the economic recession began in 2008. It may make sense to use pre-recession traffic volume levels for existing or baseline conditions.
4. Determine the level of racetrack activity occurring during the traffic count program that was done for the project. Adjust baseline traffic volumes as appropriate to reflect typical racetrack activity under existing conditions.
5. A detailed explanation of temporal traffic impacts and derivation of critical analysis period should be provided. Emphasis should be on Route 1A operations looking at hourly background volumes, hourly casino traffic volumes and hourly racetrack volumes in combination. No data has been provided to understand daily and hourly variations in racetrack volumes and how these volumes may change over time with a casino resort constructed on site.
6. Update assumptions related to background development and its anticipated traffic impacts. New projects have been identified by the City since the traffic count program was conducted. Assumptions regarding the inclusion/exclusion of the BJ's Wholesale and Seaport Square projects should be clarified. The applicant should obtain a current list of active projects from both Revere and Boston.

Study Methods/Analysis

Certain study methods should be explained or reconsidered as described below. Additional analyses should also be provided as listed.

1. Provide a systems analysis for the proposed Route 1A improvements to consider coordinated signal operations, traffic progression and vehicle stacking between closely spaced intersections. Presently, the Route 1A intersections have been analyzed as if each were operating in isolation. Explain how

clearance times have been considered in the analysis of the proposed mitigation plans. Some very wide intersections are proposed requiring long clearance times and long pedestrian signal phases.

2. Provide a detailed parking evaluation. This evaluation should look at temporal parking demands for the racetrack, casino, hotels and special events. Comparisons should be made to the proposed future parking supply. The proposed parking management plan should be described indicating how and if off-site parking might be used to serve special event parking demands. The study should also explain how the parking management plan will balance the competing goals of minimizing vehicle trip generation for the facility while precluding casino related parking in adjacent neighborhoods. (If limiting the number of parking spaces on the site is used as a strategy to reduce vehicular traffic demands might this result in increased parking demands on neighborhood streets and at nearby MBTA lots?)
3. Describe transit and pedestrian access in terms of trip distance to/from the front and back doors of the casino. The site is quite large hence; walking distances should be measured to the casino front door for patrons and from the back door for employees not just "to the site". Actual walking distances should be considered in the mode choice and trip distribution evaluations as well as in the mitigation plans. Provide a map or plan depicting the location, width and condition of all pedestrian facilities located within walking distance of the site.
4. Provide a comprehensive transit system impact analysis including a discussion of Existing, No Build and Build condition load factors on routes serving the site. Assess the impact of the project on nearby Blue Line parking facilities recognizing that employees will be encouraged to access the site via public transportation.
5. Develop and analyze post-Build traffic conditions on key study area roadways that consider the potential impact of induced development and redevelopment that may occur if and when approval of the casino project is certain.
6. Describe and compare past redevelopment plans for the subject site to the proposed casino plan. Consider trip generation impacts and traffic mitigation plans.
7. Describe how hotel traffic has been included in the traffic analysis. The one site referenced in developing trip generation rates for the study does not include a hotel.
8. Explain and describe alternative mitigation plans for the Route 1A/Boardman Street intersection. Discuss the positive and negative elements of full grade-separation and other strategies in terms of operations, land impacts, construction timetable and cost.
9. Recalibrate the existing conditions intersection analyses particularly for Bennington Street where some intersections/turning movements are reportedly operating with volume-to-capacity ratios in excess of 5.0.

10. Explain the appropriateness of analyzing traffic circles in the project area as roundabouts. Verify that the analysis model applied reflects field-observed operating protocol. Yield upon entry is assumed for roundabout operations. Drivers in Massachusetts do not always follow this protocol at traffic circles.

Mitigation

The traffic study should better define transportation mitigation plans and/or offer additional mitigation as described below.

1. Provide traffic mitigation plans for Bennington and Saratoga Street to address reported poor intersection levels of service. Describe possible strategies to upgrade signal systems and connect them to the City's traffic control center.
2. Provide 20-scale or 40-scale conceptual plans for the Route 1A improvements with proposed limits of work and rights-of-way shown. The plans should describe proposed improvements to pedestrian areas, treatment of medians and below-roadway areas.
3. Provide documentation regarding the timing of mitigation/transportation improvements proposed along roadways in Revere. It is suggested that some of these improvements will be "built by others" and may not be in place prior to project opening.
4. Provide a detailed description of proposed enhancements to existing pedestrian, bicycle and transit access to and within the site. Identify site access locations for pedestrians and bicyclists. Identify new pedestrian and bike facilities to serve the site including the proposed DCR bike path extension and spur to Bennington Street. Clarify funding and timing for these improvements along with any project contribution to these plans.
5. Develop, describe and commit to strategies to transport transit-dependent employees who may commute during non-operating hours for the MBTA.
6. Consider the need to modify time limits and/or introduce other parking management strategies to ensure that adequate on-street parking remains available to local residents on city streets. Provide "duration of stay" information for site visitors and compare the typical durations to time limits for on-street parking in the site environs.
7. Provide a detailed way finding plan that will aid visitors accessing the site along major routes. Explain strategies that will be used to deter employees, taxicabs, delivery vehicles and other regular site visitors from using "short cuts" through residential areas.
8. Explain in greater detail proposed Travel Demand Management strategies, goals and objectives to minimize site traffic generation. Explain how participation by the casino in the local Transportation Management Association might help reduce the number of vehicle trips generated by other TMA members.

9. Describe any traffic monitoring plans that may be put in place after project opening to: confirm the traffic forecasts offered during the permitting process; determine if the goals of the TDM plan are met; and, inform decision making relative to the implementation of additional post-build mitigation measures. Describe financial resources that would be committed to post-build traffic mitigation to address unforeseen circumstances.
10. Water Transportation: Describe any water transportation plans that may be in place and how the project may be able to make use of water access given East Boston's geographic location.
11. Public Safety: Describe and commitment to any special elements of the site access management plan to facilitate access by emergency vehicles.
12. Discuss possible or proposed MBTA bus route modifications that could provide more convenient site access. Describe possible changes to the MBTA BlueLine Suffolk Downs and Beachmont stations to better handle the ridership increases and shuttle bus traffic anticipated at these stations. Similarly, describe and commit to streetscape improvements along Winthrop Avenue as necessary to support increased pedestrian activity between the site and the Beachmont station.
13. Describe existing and proposed accommodations for pedestrians to cross Route 1A in the site vicinity and any pedestrian improvements/ amenities proposed along the Route 1A corridor.
14. Explain how bus staging will be managed on site. Describe measures that will be taken to minimize noise and air impacts to adjacent residential areas.

The above list is not meant to be all inclusive as additional issues will likely be identified as the project moves forward. Please do not hesitate to contact us if you have any questions regarding the above.

Regards,

STANTEC CONSULTING SERVICES INC.



Richard S. Bryant, P.E.
Senior Project Manager
Tel: (802) 864-0223
Fax: (802) 864-0165
Richard.Bryant@stantec.com