



SMART GROWTH AND REGIONAL COLLABORATION

August 8, 2014

Maeve Valley Bartlett, Secretary
Executive Office of Energy & Environmental Affairs
Attention: MEPA Office - Anne Canaday, MEPA #15060
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: Wynn Everett, MEPA #15060

Dear Secretary Valley Bartlett:

The Metropolitan Area Planning Council (MAPC) regularly reviews proposals deemed to have regional impacts. The Council reviews proposed projects for consistency with *MetroFuture*, the regional policy plan for the Boston metropolitan area, the Commonwealth's Sustainable Development Principles, the GreenDOT initiative, consistency with Complete Streets policies and design approaches, as well as impacts on the environment.

Wynn MA, LLC (the Proponent) proposes a resort and casino that will contain a 504 room hotel, gaming space, retail and dining space, as well as entertainment and meeting facilities. The project is located on approximately 33.9 acres on Horizon Way off Lower Broadway in Everett and abuts Route 99, a major commuter route that provides connections to numerous regional and interstate highways. It is also located within a major transit corridor in close proximity to two MBTA transit stations, Sullivan Square Station and Wellington Station, and a number of bus routes.

Since the filing of the Draft Environmental Impact Report (DEIR), the building program has increased by approximately 419,542 square feet to a grand total of 3 million square feet. The Proponent has expanded the gaming area, which is now 192,543 square feet and is expected to include 3,200 slot machines and 160 gaming tables. The amount of on-site parking has increased by 791 spaces. Of the 4,500 spaces now in the parking program, 3,700 are on-site and 800 are off-site. The project is forecast to generate 1,385 daily vehicle trips during the Friday afternoon peak hour (4:30-5:30 PM) and daily vehicle trips will increase to 1,691 during the Saturday afternoon peak hour (2:45-3:45 PM).

The Proponent has filed an application with the Massachusetts Gaming Commission seeking a license to operate a Category One gaming establishment at the project site. In addition, the project will require a Vehicular Access Permit from MassDOT and a Construction and Access Permit from the Department of Conservation and Recreation (DCR).

MAPC has reviewed the Final Environmental Impact Report (FEIR) and has concerns that primarily address regional traffic impacts and the need to include additional mitigation. These issues, proposed recommendations, and questions are detailed as an attachment to this letter. MAPC respectfully requests that the Secretary incorporate our recommendations as part of the Certificate and require the Proponent to address our concerns.

MAPC has a long-term interest in alleviating regional traffic and environmental impacts, consistent with the goals of *MetroFuture*. The Commonwealth also has established a mode shift goal of tripling the share of travel in Massachusetts by bicycling, transit, and walking by 2030. Additionally, the Commonwealth has a statutory obligation to reduce greenhouse gas emissions (GHG) by 25% from 1990 levels by 2020 and by 80% from 1990 levels by 2050. This project, and any Category One gaming establishment, is likely to make all these goals more challenging to achieve. Therefore, the Secretary faces a special obligation to require all reasonable actions that will minimize or mitigate the substantial adverse impacts of such projects and keep the Commonwealth on track in meeting its regulatory and statutory goals.

Thank you for the opportunity to comment on this project.

Sincerely,

Marc D. Draisen
Executive Director

cc: James Errickson, City of Everett
James Gillooly, City of Boston
Clinton Bench, MassDOT
Jack Murray, DCR

**Metropolitan Area Planning Council (MAPC) Comments on
Wynn Everett FEIR - MEPA #15060**

Gaming establishments are significant and unique traffic generators. Unlike most other uses, casinos generate traffic 24 hours a day, 7 days a week, 365 days a year. According to the Proponent's traffic impact analysis, the busiest times for vehicular trips will be on Friday and Saturday. Of these daily vehicle trips, almost 1,385 will be generated during the Friday afternoon peak hour (4:30-5:30 PM) and will increase to over 1,691 during the Saturday afternoon peak hour (2:45-3:45 PM).

The project site is situated within an urban network of highways, major streets, and public transportation hubs. Regional vehicular access to the project site will be via Route 16, Route 99, and a network of local roadways. Public transportation is provided by the MBTA with bus, train, and commuter rail service in close proximity. The MBTA services the Route 99 corridor via bus routes and also provides transit service via the Orange Line at the nearby Wellington, Malden, and Sullivan Square stations as well as the future Assembly Station.

MAPC is pleased the Proponent has proposed an extensive shuttle bus system, water transportation, bicycle and pedestrian improvements, a robust transportation demand management (TDM) program, as well as significant roadway mitigation at many of the busiest intersections leading to the site. MAPC remains concerned that traffic congestion caused by the project will hamper long planned development in close proximity to the Everett, Charlestown, Somerville, and Medford municipal borders. While the Proponent's trip generation analysis attempts to quantify future traffic conditions, MAPC believes that the forecasted increase in vehicle trips from the proposed project and all of the combined area developments will create impacts on this region.

This concern is also reflected in the Secretary of Energy and Environmental Affairs' statement in the Certificate issued for the project's Draft Environmental Impact Report (DEIR):

I note the many comments from municipalities expressing concern with the project's traffic impacts on development and infrastructure plans underway in Boston, Somerville, and Medford. These concerns are shared by MassDOT and MAPC and I expect the Proponent will work with MassDOT, the surrounding cities, and MAPC on both short-term and long-term solutions to address the project's impacts while supporting municipal redevelopment visions, roadway design plans, and improved regional connections. (DEIR Certificate, February 21, 2014, page 28)

To date, MAPC has not been contacted by the Proponent as requested by the Secretary to discuss short – and long-term solutions addressing the project's impacts. The following are specific issues which MAPC respectfully requests be incorporated as part of the issuance of the MEPA Certificate for the Final Environmental Impact Report (FEIR):

Traffic and Roadway Impacts

The transportation network will shoulder the greatest impact of the proposed project. The project's transportation impacts are major and will have significant effects on the users of the facility, the host and surrounding communities, the residents of those cities and towns, local businesses, and people who travel into or through those communities. In order to mitigate the impacts of the proposed development, the Proponent has outlined significant steps designed to improve the roadway network, reduce the number of single-occupancy vehicles (SOVs), establish better transit connections, provide private shuttle buses for patrons and employees, as well as enhance water, bicycle, and pedestrian access to the site.

The Proponent has committed to assisting with local roadway and safety improvements and has proposed a roadway mitigation program totaling \$61.6 million. These funds will contribute to the study, design, and construction of the I-93 Exit 28 off-ramp/Cambridge Street Intersection, Sullivan Square design, Route 99, Bell Circle, Santilli Circle, Sweetser Circle, and Wellington Circle.

Rutherford Avenue and Sullivan Square

Congestion at the Exit 28 ramp on I-93 and congestion through Sullivan Square are MAPC's biggest concerns in terms of traffic impacts related to I-93, a major interstate highway which serves as the main access point in and out of Boston from the north. This highway also provides access to the Sullivan Square area, and proximate major economic development sites in Somerville – Assembly Square and Inner Belt. Assembly Square is slated to become one of the state's largest mixed-use developments, centered on a new Orange Line Station, Assembly Station.

After a multi-year planning process with significant public input, the City of Boston has established a transportation and redevelopment vision for the Sullivan Square/Rutherford Avenue part of Charlestown. The vision involves scaling down traffic along Rutherford Avenue so that it becomes less of a highway and more of an urban boulevard, with dedicated bicycle and pedestrian paths adjacent to the roadway. Additionally, Sullivan Square itself will be redesigned as a gridded street network facilitating new development oriented to the Sullivan Square MBTA station. Similar to Rutherford Avenue, the goal for Sullivan Square is to create an area with less auto traffic and more walking, biking, and transit use. The plans for Sullivan Square call for new residential and commercial development that will provide much needed housing, add jobs to bolster the economy, and take advantage of the proximity of the MBTA station to encourage residents and workers to use transit rather than drive to all of their destinations.

This effort to create a “new neighborhood” in the City of Boston is highly consistent with the Commonwealth's Sustainable Development Principles, the regional plan *MetroFuture*, as well as MassDOT mode-shift goals and Green DOT programs¹. Boston's vision for Sullivan Square, which is also expected to generate numerous benefits for surrounding communities, will likely be compromised by the proposed project's increase in vehicular traffic. Specifically, 63% of all patron trips will access the site via Sullivan Square.

Due to project-generated traffic forecast to utilize this corridor, the project's traffic impacts and the vision for Rutherford Avenue and Sullivan Square contradict each other. MAPC does acknowledge that Wynn's Best and Final Offer (BAFO) to Boston includes a \$15 million contribution to implement transportation infrastructure improvements for Sullivan Square (\$1 million per year over 15 years). This contribution is in addition to the \$4.6 million in improvements it will make per MEPA requirements. However, as of this writing, an agreement has not been formalized between Wynn and the City of Boston.

While MAPC does not foresee a reasonable mitigation program that could resolve this problem adequately, there are some additional measures the Proponent could implement which may lessen the impacts. The below comments address additional bus improvements to Route 99, a strong monitoring program to ensure predicted mode share goals, and capacity improvements to the Orange Line, can help to further reduce auto trips.

Roadway Changes to Improve Bus Service along Route 99

The Proponent should include additional improvements to facilitate bus service as part of their existing commitments to the Route 99 corridor. Route 99 provides access to the project site, downtown Boston, and the interstate highway system.

In addition to serving as a primary access route to/from Boston, Everett, Malden, Medford, and Somerville, three MBTA lines (104, 105, and 109) traverse the Route 99 corridor in the vicinity of the proposed project site. On an average weekday, over 2,900 passengers board MBTA buses at stops along Route 99, accounting for about 61% of total bus boardings in Everett alone. Even though the Proponent does propose to widen the roadway to add more auto capacity and plans to work with the MBTA to enhance the existing bus stops, additional modifications are needed to improve bus service along this corridor. The Proponent should add design elements that include signal priority for buses, dedicated bus lanes, mixed-flow lanes with queue jumps, enhanced bus shelters, real-time message boards, and other bus rapid transit features that will improve bus service. Enhancing the Route 99 corridor for bus service will encourage patrons and employees accessing the project site to use this mode of transportation.

¹ The Boston Redevelopment Authority BRA and MAPC recently completed a land use study for the Sullivan Square area. The [Sullivan Square Disposition Study](#) lays the foundation to create a mixed-use, walkable neighborhood with new housing and business opportunities in close proximity to the Orange Line.

Wellington Circle

The other area of concern is Wellington Circle in Medford. Like Boston and Somerville, Medford has seen additional development occur in this area and is planning future growth along Rivers Edge Drive. While the Proponent has committed to fund conceptual designs for improvements at this intersection, they should also commit to monitor this location as part of the transportation and monitoring program.

Wellington Circle serves as a key portal to access the project site. The DEIR forecasts that 17% of patrons will access the project site from Route 16 to the west. It is important to note that Wellington Circle will be accessed first by patrons on this highway followed by Santilli Circle. It can even be argued that Wellington Circle, located approximately three-quarters of a mile west of Santilli Circle, can potentially serve as a buffer for eastbound traffic.

The Proponent plans to optimize the traffic signal timing and phasing plan as well as upgrade/replace traffic signal equipment/signs/pavement markings at Wellington Circle. The Proponent has also committed to commission and fund a permanent improvements study of Wellington Circle in its Surrounding Community Agreement with the City of Malden. Following the results of the permanent improvements study, the Proponent will fund up to 25% of the concept design (up to \$1 million) for a permanent solution for Wellington Circle. Subsequent to the study and design, the Proponent has indicated that they intend to seek funding from the Transportation Infrastructure and Development Fund for a permanent solution for Wellington Circle. To reiterate, Wellington Circle should be monitored as part of the Proponent's transportation and monitoring program.

Public Transportation

The project site is located in such a way that patrons and employees can take advantage of public transportation resources in the area, including MBTA Orange Line service at Sullivan Square, Assembly Square, Malden Center and Wellington Stations, and MBTA bus service along Broadway.

The Proponent's FEIR has an integrated public transportation component as part of the project's transportation program, which will result in increased demand on MBTA service. While the Proponent has conducted analyses that indicate MBTA service will mostly not exceed capacity, that is hardly an assurance of optimal performance. MAPC believes that public transportation will be strained by the substantial addition of new passengers, especially at peak times.

As described in the DEIR, the Proponent assumes that 80% of all Orange Line riders destined to the project site will originate from south of Sullivan Square. As acknowledged by the Proponent, these riders will prefer to exit at Sullivan Square station rather than travelling further north to Malden Center or Wellington Stations. Based on their own analysis, the Proponent has identified that the weekday passenger load currently exceeds capacity (107%) in the northbound direction between North Station and Community College Station. However, when project trips are added, the load increases to 117%.² Additionally, the passenger load is also forecast to exceed capacity for this segment during the 8-9 PM period. Specifically, the Orange Line is currently at 94% of capacity during this period and the new project trips would increase the passenger load to 103% of capacity.

To off-set these impacts, the Proponent should partner with the MBTA by contributing to the both the operating and maintenance costs of area bus and subway lines in amounts that are reasonably related to the additional demand of the project. MAPC believes strongly that transportation impact mitigation should not be limited solely to roadways.

MBTA Maintenance Facility

The MBTA's Maintenance Facility adjacent to the project site is an essential back shop for MBTA services and operations. The MEPA Certificate for the DEIR points out the importance of the Maintenance Facility, which is also acknowledged in the Proponent's FEIR. The FEIR outlines two proposed vehicular access plans – a Primary Site Access Plan and an Alternate Site Access Plan. The Primary Site Access Plan will necessitate vehicular access changes, land acquisition, and other infrastructure improvements at the Maintenance Facility that will need to be coordinated with the MBTA. The Alternate Site Access Plan would locate the project's driveway along the existing Horizon Way and would require minor modifications to the MBTA Maintenance Facility's access. The FEIR has indicated that discussions among the Proponent, the MBTA, and MassDOT regarding the design of a final Site

² Capacity is defined as 100% of seats.

Access Plan are ongoing. Regardless of which Site Access Plan is selected, it is imperative that the MBTA Maintenance Facility remain accessible and available at all times for MBTA use and that truck and shuttle bus connections to the project site be mitigated and not hinder area MBTA bus service and vehicular access.

Proponent Funded Private Shuttle Program

Since the Proponent plans to dedicate the majority of on-site parking to patrons, most employees will need to access the project site by public transportation or shuttle services provided by the Proponent. The Proponent's shuttle program proposes a comprehensive network of shuttle routes to serve patrons and employees, and encourage non-automobile travel.

MAPC is pleased that the Proponent has proposed a shuttle program for employees that will operate between three off-site parking facilities and the project site. Parking for employees will be at Malden Center, Wellington Station in Medford, and in Everett's Lower Broadway/Beacham Street area. According to the FEIR, up to 1,000 parking spaces could be provided at Malden Center and up to 800 parking spaces at Wellington Station. In addition, parking agreements at these two locations are well underway. However, the FEIR states that the location of the third off-site parking facility in Everett still needs to be determined. The exact location, number of parking spaces, and route information for this off-site parking facility needs to be provided by the Proponent.

Charter Buses

While the FEIR does mention that private charter buses will transport groups directly to the project site, the FEIR does not mention where the charter buses will park long-term. For example, will charter buses park remotely and patrons then be brought to the site by shuttles? Or will the charter buses utilize the casino's main entrance for pick-up and drop-off?

Timeline

While the FEIR contains a scope outlining mitigation commitments, a timeline needs to be developed that will address the Proponent's contributions to programming for infrastructure and roadway improvements as part of its mitigation responsibilities. A scope and timeline of mitigation commitments should be included in the Section 61 findings as a basis for subsequent permitting.

Plans for the long range maintenance and upkeep of infrastructure improvements (e.g., new and existing roadways, transit improvements, and bicycle/pedestrian infrastructure) should also be included. MAPC recommends that transportation infrastructure improvements take place as early as possible so improvements will both benefit the metropolitan area and improve traffic flow during construction.

Transportation Monitoring and Reporting

The FEIR outlines an extensive and thorough post-development transportation monitoring and reporting program. The Proponent has committed to conducting regular monitoring and reporting of transportation mode shares and adjusting the project's alternative transportation services and TDM programs as necessary. Completed at the Proponent's expense for a period of five years after full occupancy, the monitoring and reporting program will include annual data collection of traffic counts, parking, public transportation, and travel modes. The Proponent indicates that the reporting structure will assist in assessing mode share goals of no more than 71% of patrons and 41% of employees arriving by automobile respectively. Corrective measures will be undertaken by the Proponent if the monitoring indicates there are operational deficiencies at the monitored locations and if either of the following conditions apply: 1) traffic volumes for the project exceed 110% of the projected volumes or 2) the distribution of project-related traffic from the project site entrance to the roadway network varies by more than 10% of the trip assignment assumed for the project. The Proponent's monitoring and reporting commitments should be reflected in the Certificate's requirements.