



SMART GROWTH AND REGIONAL COLLABORATION

August 21, 2015

Matthew A. Beaton, 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, SSFEIR

Dear Secretary Beaton:

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 629 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.

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 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 this project and keep the Commonwealth on track in meeting its regulatory and statutory goals.

MAPC has reviewed the Second Supplemental Final Environmental Impact Report (SSFEIR). Since the filing of the Supplemental Final Environmental Impact Report (SFEIR), the building program has remained the same, including approximately 3.1 million square feet. The number of on-site parking spaces has been reduced from 3,400 spaces to 2,930 spaces. The Proponent should be commended for reducing the amount of on-site parking by 470 spaces as well as aggressively promoting access to the site by public transportation. Both measures will serve as a strong disincentive for both patrons and employees to access the site by driving. While the overall trip generation has not changed, these steps will help to achieve the Proponent's mode split goals.

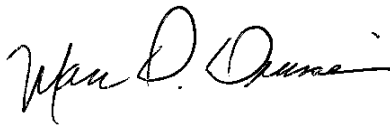
At the same time, we remain deeply concerned about the potentially negative impact of the Wynn Everett project on the vision which the City of Boston and the Charlestown neighborhood have developed for the redesign of Rutherford Avenue into an urban boulevard, and the reconfiguration of Sullivan Square into a vibrant, transit-oriented neighborhood. This plan is highly consistent with the Commonwealth's Smart Growth Principles and it would provide more space for housing, jobs, green space, sidewalks, and bicycle infrastructure, but less roadway capacity than the existing layout.

There is an ongoing need for the Proponent, the City of Boston, MAPC, other surrounding communities, and relevant state agencies to collaborate in order to reach an agreement on the transportation measures, mitigation, and monitoring needed to support the long-term vision for Sullivan Square and Rutherford Avenue. Even more broadly, various other projects in the vicinity will also have a substantial impact on traffic in this area, and therefore efforts to improve transportation infrastructure and mitigation measures must be coordinated among all the interested parties. Therefore, MAPC proposes the establishment of a Regional Working Group to address these issues that cross municipal boundaries and affect multiple projects.

This issue, proposed recommendations, and concerns regarding other aspects of this project are detailed as an attachment to this letter. MAPC respectfully requests that the Secretary incorporate our recommendations as part of the SSFEIR Certificate and require the Proponent to address our concerns.

Thank you for the opportunity to comment on this project.

Sincerely,

A handwritten signature in black ink, appearing to read "Marc D. Draisen". The signature is fluid and cursive, with a distinct loop at the end.

Marc D. Draisen
Executive Director

cc: Anthony Sousa, City of Everett
Gina Fiandaca, City of Boston
Joseph Barr, City of Cambridge
Lauren DiLorenzo, City of Medford
Michael Glavin, City of Somerville
David Mohler, MassDOT
Carol I. Sanchez, DCR

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

City of Boston - Sullivan Square/Rutherford Avenue

Background

The transportation network will shoulder the greatest impact of the Wynn Everett project. This project's transportation impacts are major and will have significant effects on 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 these impacts, the Proponent has outlined short and long-term steps designed to improve the roadway network and to complete all proposed roadway improvement mitigation prior to project opening.

The major issue for Sullivan Square and Rutherford Avenue is how the Proponent's projected traffic will impact the City of Boston's vision for redesigning the corridor as a pedestrian and bike-friendly boulevard and adding a new gridded street network near Sullivan Square Station. Recognizing that the Proponent's trip generation will likely cause significant congestion for the City of Boston's plan, the Secretary's SFEIR Certificate created a working group comprising MassDOT, Massachusetts Gaming Commission (MGC), the City of Boston, the Proponent, and other surrounding communities, tasked with reaching consensus on the long-term planning and mitigation for the area. Unfortunately, this effort did not advance significantly prior to the filing of the SSFEIR. Unless and until this happens, it will be difficult to determine the exact impacts of the casino project on the City's vision for Sullivan Square and Rutherford Avenue, and exactly what mitigation steps are needed.

Therefore, our comments are divided into two main sections. Firstly, we address "short-term" issues that relate to impacts prior to any redesign of Sullivan Square and Rutherford Avenue; secondly, we suggest ways – mainly through the establishment of a Regional Working Group – to monitor impacts over time and to address "long-term" issues that will arise with the implementation of the City's vision for the redesign of the area.

Short-Term Plan

To address the traffic impacts to the existing Sullivan Square and Rutherford Avenue roadway alignments, the Proponent has committed to \$10.9 million of improvements to be implemented prior to the construction of the Wynn Everett casino. Specifically, the Proponent proposes circulation improvements for buses at the Sullivan Square MBTA Station, such as a dedicated bus lane and reconstruction of the lower busway. These improvements will improve reliability and travel times, reduce the number of buses going through the Sullivan Square rotary, and improve the flow of MBTA buses at Sullivan Square Station.

MAPC recognizes that the short-term plan will prevent existing traffic from degrading and is forecast to improve some intersections and reduce wait times at others during the Friday morning peak hour. The Cambridge Street/I-93 northbound off-ramp will improve from Level of Service (LOS) E to LOS C. The only signalized intersection in Sullivan Square, Main Street/Maffa Way/Cambridge Street/Alford Street will experience an overall modest 35 second reduction in delay time. MAPC notes that while the LOS is projected to continue operating at LOS F for the Maffa Way eastbound approach and the Alford Street southbound approach, delays would be slightly reduced by 45 seconds and 62 seconds respectively. These improvements will likely address the short-term traffic conditions.

Long-Term Issues

The Proponent has also committed to long-term mitigation, delineated into two key programs:

- A payment equal to \$25 million (over 10 years) toward implementing a long-term solution to alleviate traffic congestion in Sullivan Square and Rutherford Avenue as part of the vision for re-designed roadway network.
- An annual payment of \$20,000 per additional vehicle entering and leaving the Wynn Everett site using Sullivan Square above Friday afternoon peak hour projections. This payment is for the first 10 years and is capped at \$2 million a year and \$20 million total.

While these are positive commitments, they may not be enough to avoid additional Damage to the Environment, as defined in the MEPA regulations, when the City of Boston transforms Rutherford Avenue into an urban boulevard and redesigns Sullivan Square into a transit-oriented neighborhood. It is important to note that this transformation is already recognized by the Commonwealth via the inclusion of this project in the 2020 – 2025 period of the Long Range Transportation Plan, as recently approved by the Boston Region Metropolitan Planning Organization, and by the approval of funds for the City of Boston to begin design of the new transportation infrastructure in this area.

Therefore, it is imperative that this area be closely monitored post-development. Every effort should be made to minimize and mitigate negative impacts that might degrade the City's vision for Sullivan Square/Rutherford Avenue. The new neighborhood proposed around Sullivan Square and the redesign of Rutherford Avenue is entirely consistent with the Commonwealth's Sustainable Development Principles, the *MetroFuture* regional plan, as well as MassDOT mode-shift goals and GreenDOT program. Furthermore, it would help the Commonwealth to meet its statutory obligations under the Global Warming Solutions Act.

Regional Coordination

The Wynn Everett project is not the only development that is likely to affect the transportation infrastructure in and around Sullivan Square. Additional projects such as the build-out of Assembly Row and Inner Belt in Somerville will likely increase roadway and transit use through Sullivan Square and along Rutherford Avenue. These developments are also likely to influence congestion at other key roadways and intersections, including the ultimate design for a grounded McGrath Highway in Somerville.

It is imperative that responsible public entities and the proponents of major development projects in this area work together in a cooperative manner to develop a unified perspective on the following topics:

- suggesting which transportation improvements might be funded via the \$25 million fund mentioned above, or via other mitigation resources;
- coordinating these efforts with transportation projects that might be funded with federal, state, or municipal funds, or by mitigation funds established by proponents of other projects;
- developing policies or mechanisms to minimize Single Occupancy Vehicle (SOV) trips generated by development in these areas, and to maximize the conversion of auto trips to transit, bicycle, and pedestrian;
- identifying adaptations to the transportation system to be more resilient to climate change, sea level rise, and major storms; and

- other topics which the Secretary might consider germane to minimizing or mitigating future Damage to the Environment resulting not only from the Wynn Everett project, but also from projects in the study area.

Therefore, the Section 61 Findings, in order to minimize and mitigate future Damage to the Environment, should establish a Regional Working Group, which would provide a coordinated review in a manner similar to an Area Wide Review under 301 CMR 11.09(4)(b), and include the following parties: MassDOT, the MBTA, Department of Conservation and Recreation (DCR), Coastal Zone Management (CZM), Department of Environmental Protection (DEP), MGC, MAPC, the cities of Boston, Everett, Somerville, Medford, and Cambridge, the Proponent, and other major property owners or interested parties, as determined by the Secretary. The study area for the Regional Working Group should be consistent with the area analyzed by the Proponent to determine the regional transportation impacts in Draft Environmental Impact Report (DEIR).

MAPC, as the regional land use, transportation, and environmental planning agency for Greater Boston, respectfully offers to facilitate the research, meetings, and discussions of this working group, and to provide technical assistance in their ongoing deliberations. MAPC was recently funded by the Executive Office of Housing and Economic Development to identify local, regional, and state-level priority development and preservation areas in the “Metro North” municipalities of Chelsea, Everett, Malden, Medford, Melrose, Revere, Somerville, and Winthrop, and the neighborhoods of East Boston and Charlestown in Boston. As a result of this project and other MAPC work, we have become very familiar with transportation and other infrastructure improvements that would help to support the projected development and minimize negative impacts. The final report can be found at www.mapc.org/MetroNorth.

City of Medford - Wellington Circle and Proximate Intersections

The Proponent has committed to a \$6 million dollar mitigation program in the City of Medford that will address impacts to Wellington Circle, the Mystic Valley Parkway (Route 16)/Route 16 Connector, and Mystic Valley Parkway (Route 16)/Mystic Avenue prior to the project opening. Key components of the Proponent’s mitigation program include:

- \$4 million in traffic signal improvements, roadway upgrades and geometric changes to Wellington Circle.
- \$500,000 in traffic signal and Americans with Disabilities Act (ADA) improvements to the Mystic Valley Parkway (Route 16)/Route 16 Connector and Mystic Valley Parkway (Route 16)/Mystic Avenue.
- \$15,000 for a Road Safety Audit at the intersection of Mystic Valley Parkway (Route 16)/Route 16 Connector.

Although the Proponent has allocated up to \$1.5 million for studying long-term alternatives to reconstruct Wellington Circle and will fund up to 25% of the concept design (up to \$1 million) for a permanent solution, MAPC recognizes that the City of Medford has concerns regarding the viability of Wellington Circle to accommodate future traffic demands once the project is occupied. MAPC is also aware that the City of Medford questions the validity of the Proponent’s proposed future operating conditions at the Harvard Street/Mystic Valley Parkway (Route 16)/Mystic Avenue (Route 38)/I-93 Exit 31 Southbound Off-Ramp cluster of intersections. Similar to Sullivan Square/Rutherford Avenue, it is imperative that this area be closely monitored post-development. Furthermore, the Regional Working Group should also inform the expenditure of these mitigation funds and evaluate the results

of project monitoring. Every effort should be made to minimize and mitigate negative impacts that have the potential to worsen traffic conditions at these locations. The Proponent should be responsible for working with the City of Medford and the Regional Working Group regarding the expenditure of funds, monitoring, and implementation of a long-term improvement program to minimize or mitigate future Damage to the Environment from increased traffic congestion at these locations.

Orange Line

MAPC applauds the Proponent for developing a mitigation program to improve Orange Line service. In sum, the Proponent proposes providing extra Orange Line trains during four key peak periods where demand exceeds service¹. Providing extra trains designed to increase Orange Line frequency will reduce headways, address capacity issues, and accommodate additional ridership. Improving the reliability and frequency of the Orange Line will encourage the use of this mode of transportation. For many years, MAPC has called upon other project proponents to invest in MBTA capital projects and operations in order to mitigate negative impacts or increased demand on the transit system. This commitment of approximately \$7.4 million over the next 15 years is therefore a welcome breakthrough in response to the requirements of the Secretary's latest Certificate.

As outlined in the SSFEIR, this detailed mitigation program is designed to be flexible and can accommodate adjustments, if needed, to meet overall goals. Although the proposed subsidy methodology is based upon calculating a revenue projection which is then deducted from the operating cost, the calculation must also take the MBTA's maintenance costs into consideration. This proposed mitigation program should also cover any potential increase in maintenance costs that may be incurred by the MBTA.

Pedestrian/Bicycle Connection across the Mystic River

MAPC is pleased that the Proponent will contribute up to \$250,000 to the DCR for a study to examine the design of a pedestrian/bicycle connection across the Mystic River linking Somerville and Everett as part of their mitigation program. However, it is important to note that an Alternatives Analysis of a Mystic River crossing has already been performed in a study commissioned by DCR in 2009. This study analyzed designs for a bicycle and pedestrian connection and several were considered to be viable options. Accordingly, the \$250,000 should be used to build upon, not duplicate, this study. Specifically, the funds should be used for the selection of a design alternative and preparation of more detailed design plans. In addition to the bridge crossing, we suggest that the design and permitting should include the entire distance from the current terminus of the Northern Strand path at West and Wellington Streets to the Mystic River.

On this effort, the Secretary should instruct the Proponent to work closely with the DCR, the cities of Somerville and Everett, adjacent stakeholders (e.g., Federal Realty, DDR/Gateway Center, Partners Health Care), the Landline Coalition, the Somerville Bicycle Advisory Committee, and other local organizations.

¹ The four key peak periods where demand exceeds service are weekdays (southbound) between 9-10 a.m., weeknights (northbound) between 7-8 p.m., weeknights (northbound) between 8-9 p.m., and Saturday (southbound) between noon and 1 p.m.

Off-Site Employee Parking 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. While MAPC is pleased that the Proponent has proposed a shuttle program for employees that will operate between off-site parking facilities and the project site, significant questions remain. According to the SSFEIR, up to 800 parking spaces will be provided among three off-site locations – in Malden at a downtown garage, in Medford adjacent to Wellington Station, and in Everett’s industrial quadrant southeast of the project site. The Proponent has yet to identify the exact allocation of the 800 parking spaces. In addition, the location of the Everett off-site parking facility and its associated shuttle route has yet to be provided.

MAPC acknowledges the Proponent’s response that they are in the process of securing parking and working on lease arrangements at existing facilities in Medford and Malden and that available parking capacity has been identified which will not displace existing parking demand. However, MAPC remains concerned that the exact allocation of parking spaces among these three locations has not been provided as part of the overall off-site employee parking program. Significant concentration of employee parking in a downtown area—like Malden Center—may have negative impacts on future redevelopment plans and shift on-street parking to garages. Off-site parking at these three locations needs to be secured prior to the project’s opening and should be included as a condition in the Secretary’s Section 61 Findings.

It should be noted that MAPC has repeatedly raised this issue in its comment letters addressing the Proponent’s Draft Environmental Impact Report (DEIR), Final Environmental Impact Report (FEIR), and SFEIR.