



March 7, 2016

Lionel Lucien, P.E.
Manager, Public/Private Development Unit
Office of Transportation Planning
10 Park Plaza, Room 4150
Boston, MA 02116

RE: Wynn Resort in Everett, EEA #15060

Dear Mr. Lucien:

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 other impacts on the environment.

MAPC has reviewed the draft Section 61 Findings for the Wynn Resort in Everett which we found to contain many strong elements. However, our primary recommendation is to include language that outlines and enforces the Project's mode share goals. Our intent is to ensure that the mode share goals are achieved and traffic impacts do not exceed what has been identified through the MEPA process.

We note that the draft Section 61 Findings outline a detailed and comprehensive transportation monitoring program that includes data collection for roadways, parking, and public transportation and also states there will be an annual travel mode analysis. However mode share goals are not identified. MAPC respectfully requests that mode share goals, which are identified in the Massachusetts Gaming Commission's Agreement to Award the Category 1 License in Region A to Wynn MA, LLC (Gaming License), also be incorporated directly into the Section 61 Findings. The License specifically states that the Project has set a goal of 29% of patrons to arrive to the site via non-automobile modes, with 71% arriving via automobile and taxi. For employees the goal is for 59% to arrive via non-automobile modes and the remaining 41% arriving via automobile¹.

Accordingly, the Section 61 Findings should contain a provision that if monitoring demonstrates that proposed mitigation is not effective in achieving these goals or if there are operational deficiencies, Wynn Everett (Proponent) will be responsible for identifying and implementing additional mitigation measures. We also note that the City of Boston's recently executed Surrounding Community Agreement contains such a provision². A similar provision should be included in the Section 61 Findings for consistency.

The Supplemental Final Environmental Impact Report (SFEIR) Certificate states, "Mode share goals were reviewed and approved by MassDOT with the understanding that actual trip generation and travel patterns will be tracked through the TMP³. If monitoring demonstrates that proposed mitigation is not effective in accommodating the future traffic volumes at key area intersections impacting the state highway system, the Proponent will be responsible for identifying and implementing additional

¹ Exhibit 2 – Summary of Conditions, p. 15.

² Section 7.1.B. Transportation Mitigation, p. 5.

³ TMP – Transportation Monitoring Program

improvements at these locations. These may include improvements to roadway infrastructure and design, adjustments to traffic signal timing and phasing modifications, optimization of the coordinated/interconnected signal system, and/or further refinement of the TDM⁴ program to improve its effectiveness.” (page 23)

MAPC notes that, according to the Second Supplemental Final Environmental Impact Report (SSFEIR) Certificate, the Final Section 61 Findings will be incorporated into the Gaming License which will be filed with the MEPA office and that compliance with the Section 61 Findings and the conditions of the Gaming License will be part of a regular quarterly review conducted by the Massachusetts Gaming Commission. Accordingly, as part of its Summary of Conditions, the Gaming License states there will be “compliance with all of the terms and conditions required by MEPA as provided in the Secretary’s certificate and in any FEIR or SFEIR required by the EOEEA.”⁵ In order to properly implement this procedure, it is imperative that there be consistent language between the Final Section 61 Findings and the Gaming License.

MAPC looks forward to participating as a member of the Lower Mystic Regional Working Group, created as part of the MEPA process for this project, which is tasked with studying transportation impacts likely to occur from future growth and development in and around Sullivan Square. We hope and expect that the Regional Working Group will develop a set of mitigation strategies including infrastructure, TDM, and land use policies to address these impacts. MAPC anticipates this on-going and coordinated planning effort will help to minimize future traffic impacts – but in order for this process to succeed, we must also ensure that the mode share goals incorporated into the licensing and permitting process for the Wynn Everett Casino are indeed achieved.

Thank you for the opportunity to comment on these draft Findings.

Sincerely,



Marc D. Draisen
Executive Director

cc: John Barros, City of Boston
Carlo DeMaria, City of Everett
Joseph A. Curtatone, City of Somerville
Stephen Crosby, Massachusetts Gaming Commission
David Mohler, MassDOT
Matthew A. Beaton, EOEEA

⁴ TDM – Transportation Demand Management

⁵ Section 7.1.B. Transportation Mitigation, p. 2.