



February 11, 2014

Richard K. Sullivan, Jr., Secretary  
Executive Office of Energy & Environmental Affairs  
100 Cambridge Street, Suite 900  
Boston, MA 02114

RE: Wynn Everett, MEPA #15060

Dear Secretary Sullivan:

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 2.6 million square foot resort and casino that will contain a 500 room luxury 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 (Route 99) in Everett. The project 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. The busiest times will be Friday and Saturday when the number of daily vehicle trips the project is forecast to generate will be 21,552 and 25,456 respectively. Of these daily vehicle trips, 1,743 will be generated during the Friday afternoon peak hour (4:30-5:30 PM) and will increase to 2,122 during the Saturday afternoon peak hour (2:45-3:45 PM). A total of 2,909 garage parking spaces are proposed for the project.

The Proponent plans to file an application with the Massachusetts Gaming Commission seeking a license to operate a Category 1 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 Draft Environmental Impact Report (DEIR) and has concerns that focus primarily on regional traffic impacts; the negative impact that traffic might have on nearby development opportunities; the need for additional mitigation, especially to encourage transit use; the lack of detailed information regarding regional shuttles and charter buses; and the need for a specific mode shift goal, along with a robust monitoring program. These issues, proposed recommendations, and additional questions are detailed as an attachment to this letter.

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 1 gaming establishment, is likely to make all these goals more challenging to achieve. Therefore, MAPC believes that you face 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. We respectfully request that you incorporate our recommendations and questions into the scope for the Final Environmental Impact Report (FEIR).

Thank you for the opportunity to comment on this project.

Sincerely,

Executive Director

cc: James Errickson, City of Everett  
James Gillooly, City of Boston  
Clinton Bench, MassDOT  
Jack Murray, DCR  
John Ziemba, Massachusetts Gaming Commission

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

Casinos 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 will be Friday and Saturday when the number of daily vehicle trips the project is forecast to generate will be 21,552 and 25,456 respectively. Of these daily vehicle trips, almost 1,743 will be generated during the Friday afternoon peak hour (4:30-5:30 PM) and will increase to over 2,122 during the Saturday afternoon peak hour (2:45-3:45 PM). A total of 2,909 garage parking spaces are proposed for the project.

MAPC's biggest concern is that traffic congestion caused by the project will hamper long planned development that is occurring or planned in close proximity to the Everett, Charlestown, Somerville, and Medford municipal borders. While the trip generation analysis attempts to quantify future traffic conditions, MAPC is concerned that the forecasted increase in auto trips from the proposed casino and all of the combined area developments will create severe impacts on this region. Notwithstanding additional roadway improvements, it is essential that the proponent make a concerted effort on three fronts: 1) additional public transit related mitigation to convert more trips from auto to transit, 2) a comprehensive shuttle program for patrons and employees that includes comprehensive satellite parking locations, particularly for patrons coming from the south, and 3) a well-designed program for charter bus service.

If the Proponent focuses solely on traditional roadway improvements, as currently proposed, this could result in negative impacts on bicycle and pedestrian connectivity, noise, and air quality. Therefore, the Proponent needs to take specific actions that would maximize the proportion of non-auto trips to the site by patrons and employees. Toward that end, MAPC respectfully requests that the Secretary require that the Proponent include a monitoring program designed to ensure specifically defined mode share goals and adhere to a mitigation timeline. The following are specific components MAPC would like to have the Proponent address as part of the Final Environmental Impact Report (FEIR).

### **Roadway Impacts**

The Proponent has committed to assisting with local roadway and safety improvements and has already proposed a roadway mitigation program that totals \$30.6 million. However, there are specific areas where the mitigation program can be strengthened. In order to deal with issues of accessibility, congestion, air quality, and safety, the Proponent must not only take steps to improve traffic flow, but must also take equally aggressive steps to strengthen public transit and encourage the conversion of trips from automobile to transit and other alternative modes. Specific locations are as follows:

#### Roadway Changes to Improve Bus Service along Route 99

Route 99 provides access to the project site, downtown Boston, and the interstate highway system. The Route 99 corridor also provides a significant amount of bus service. On an average weekday, over 2,900 passengers board MBTA buses at stops along the Route 99 corridor, 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, additional roadway design changes 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.

#### Sullivan Square, Rutherford Avenue, and Assembly Row

The City of Boston and MassDOT (Project #606226) have undertaken an extensive study of alternatives to improve traffic operations and safety at Sullivan Square, reconnect this Charlestown neighborhood to the waterfront, improve pedestrian and bicycle access, and open up undeveloped parcels to create a new mixed-use neighborhood around the Sullivan Square Orange Line Station. A preferred alternative was recently selected by the City of Boston after extensive public outreach and comment. This alternative will entail the removal of the current Rutherford Avenue underpass and Sullivan Square rotary, and replace these facilities with a landscaped surface street grid controlled by a coordinated traffic signal system. Additionally, the Boston Redevelopment Authority (BRA) and MAPC recently completed a land use study for the Sullivan Square area ([Sullivan Square Disposition Study](#)). This study lays the foundation to create a mixed-use, walkable neighborhood with new housing and business opportunities in close proximity to the Orange Line.

One of MAPC's biggest concerns is the level of traffic impacts on Sullivan Square and Rutherford Avenue generated by the casino project, along with impacts from other anticipated development. For example, 15% of patron trips and 9% of employee trips to the casino are forecast to utilize Rutherford Avenue to access the project site, and 63% of patron trips will access the site via Sullivan Square. The City of Boston's redesign of Rutherford Avenue decreases current capacity in order to enable improved pedestrian and bike access, provides additional open space, and creates a much more livable street than the current Rutherford Avenue, which acts as a highway isolating the Sullivan Square area from the rest of Charlestown. Similarly, the new gridded street network planned for Sullivan Square will enable new transit-oriented development (TOD), generating both jobs and homes and creating a more vibrant neighborhood.

The Somerville side of Sullivan Square will act as one of the main access points to the new Assembly Row development, which will become one of the state's largest mixed-use developments clustered around a new Orange Line Station. Further to the west of Sullivan Square is the Inner Belt area of Somerville, which is another site slated for mixed-use TOD, made possible by the extension of the Green Line from Lechmere into Somerville.

### Wellington Circle

The other area of major 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 provide additional mitigation beyond what is currently proposed for this area. The Proponent should work with MassDOT, DCR, Medford, and MAPC to determine the additional components that they will be responsible for mitigating.

Taken together, a tremendous amount of public and private funding is supporting the infrastructure at these sites. No single project should be allowed to endanger the viability of these long-term plans for neighborhood improvement, expanded housing, and economic development. Therefore, the Proponent should be responsible for additional mitigation that will specifically convert more auto trips to shuttles, public transit (subway and bus), and other modes, thereby reducing the negative traffic impacts on rezoning, development, and infrastructure plans already underway in Boston, Somerville, and Medford. Furthermore, we believe the Proponent should contribute to the redesign efforts at Rutherford Avenue and Sullivan Square by paying for a portion of the design, engineering, and development costs, in light of the increased traffic impacts that the casino will generate in these areas. The Secretary should require the Proponent to work with MassDOT, the surrounding cities, and MAPC on both short-term and long-term solutions to these difficulties in such a way as will advance the municipal redevelopment visions, roadway design plans, and improved regional connections.

## **Traffic Analysis**

### Patron Mode Share

The DEIR assumes that 69% of patrons will drive to the site, 10% will take the Orange Line, 10% will arrive by tour bus, 8% will arrive by taxi, and 3% will use water transportation. The traffic analysis does not assume a mode share for patron access to the site by either MBTA bus or on foot. MAPC disagrees with this assumption and requests that the traffic analysis be revised to include these two modes. Accordingly, the revised traffic analysis needs to be included in the FEIR.

It is important to note that the empirical data from comparable gaming facilities used to develop patron trip rates allocated mode shares for both pedestrian and bus access. Specifically, 5% of trips were assumed to be by public transit or pedestrian mode for Sugar House Casino in Philadelphia, Pennsylvania.<sup>1</sup> The mode share for the Resort World Casino at Aqueduct in Queens, New York assumes that 1% of patrons will arrive to the site by taxi, 11% by local bus, and 2% by walking or bicycling.<sup>2</sup>

### Route 99 (Broadway) Peak Hour Analysis

The Proponent conducted two types of peak hour analysis for the Friday p.m. peak hour and the Saturday afternoon peak hour for Route 99 (Broadway). One analysis combined existing peak hour with the peak hour trips generated by

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<sup>1</sup> Updated Traffic Impact Analysis – SugarHouse, Gannett Fleming, October 13, 2006.

<sup>2</sup> Development and Operation of a Video Lottery Facility at Aqueduct Racetrack, Jamaica (Borough of Queens), SEQRA, Environmental Assessment Form, New York State Division of the Lottery, October 2010.

the project (peak + peak). The second, and less conservative analysis, combined peak hour traffic of the roadway with the actual amount of traffic that would be generated by the project during that hour – referred to by the Proponent as the “real” traffic analysis. The FEIR needs to succinctly summarize and clearly describe and compare the differences between the peak + peak and so-called “real” traffic analysis.

## Mitigation for Public Transportation

It is important to note that *Hub and Spoke*<sup>3</sup>, a report recently completed by Northeastern University, has determined that the Orange Line already has congestion and capacity issues. Specifically, the Orange Line from North Station to Downtown Crossing is highly congested. *Hub and Spoke* raises serious concerns about congestion and potential capacity on this segment of the Orange Line.

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 Wellington or Malden Center 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%.<sup>4</sup>

While the Proponent has committed to an extensive mitigation program for roadway improvements, mitigation for public transportation is minimally addressed. The Proponent needs to outline how they will coordinate with the MBTA, specifically identifying how connections to and from the project site can be enhanced for patron bus use, and how increased patron use will impact MBTA bus capacity. The Proponent should partner with the MBTA by contributing to the operating costs of area bus lines and the Orange Line in an amount that is reasonably related to the project’s additional demand. Opportunities for improving Orange Line service include assisting with decreasing headways in order to alleviate overall capacity issues.

A valid Transportation Demand Management (TDM) program, which would be tailored to include mode share goals for all types of public transit, including bus service for patrons and a decreased reliance on taxis, should incorporate this partnership with the MBTA. As mentioned by the Proponent throughout the DEIR, “An important facet of the transportation improvement program is incentivizing both employees and patrons to use alternative modes of transportation to access the Project in order to reduce both traffic and parking demands associated with the Project.”<sup>5</sup> Yet, MAPC concludes from a review of the details provided in the DEIR, that the Proponent does not provide adequate mitigation to make such a “transportation improvement program” a reality. The overall shift of vehicle trips to alternative modes of transportation is insufficient, and the Proponent should be required to take additional steps (as outlined in this letter) to achieve more significant goals.

## Mitigation Timeline

The scope and schedule of proposed mitigation need to be clearly outlined as part of the MEPA process. All mitigation commitments should ultimately be included in the Section 61 findings as a basis for subsequent permitting as well as in the relevant Host Community and Surrounding Community Agreements.

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. Ideally, this will include the additional mitigation that MAPC is calling for in this letter, specifically in regard to improved transit service, conversion of automobile trips to alternate modes, and preserving the integrity of development plans and neighborhood redesign in Boston, Somerville, and Medford.

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. It is recommended that

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<sup>3</sup> *Hub and Spoke*, Core Transit Congestion and the Future of Transit and Development in Greater Boston, Northeastern University, June 2012.

<sup>4</sup> Capacity is defined as 100% of seats.

<sup>5</sup> Wynn Everett, *Draft Environmental Impact Report*, Volume II, December 16, 2013, pages AI-7, AI-12, AI-18, AI-19, AI-41, AI-60, AI-83, AI-99, and AI-105.

transportation infrastructure improvements take place as early as possible so these improvements will both benefit the metropolitan area and improve traffic flow during construction.

### **Mode Shift and Monitoring Program**

A monitoring program must be designed to ensure specifically defined mode share goals (vehicular, subway, bus – including charter, shuttle, and public), bicycle, pedestrian, and water transit for both patrons and employees are accomplished. An estimate of likely mode share is not a goal – a real goal includes a target for shifting car trips to other modes, along with specific steps to achieve that goal. For example, as we have said earlier, the Proponent estimates that 69% of patrons will drive to the site; the Proponent also predicts that 20% of employees and 10% of patrons will use the Orange Line. These are just predictions; they are not goals for improved performance.

Mode share goals should be consistent with the Commonwealth's mode shift goal of tripling the share of travel in Massachusetts by bicycling, transit and walking. Along with specific steps to achieve these goals, the Proponent should provide annual updates, publicly sharing the results. Mode share goals should result in an increase of public transportation, shuttles, charter buses, walking, and bicycling, and a decrease in single-occupancy vehicle (SOV) use.

The Secretary should require that the Proponent establish a goal consistent with these principles, along with a monitoring program to ensure compliance. While MAPC is pleased the Proponent has committed to a monitoring program for a period of five years, specific locations for monitoring must be identified in the FEIR.

The monitoring program should have measurable milestones and serve as a benchmark for progress in meeting the mode share goals and other transportation objectives, including changes in parking, local and regional traffic, and public transportation. It should outline contingency measures that will be undertaken if these benchmarks are not met. The intent of the transportation monitoring program is to confirm that actual changes are consistent with forecasted changes. With a monitoring program, the actual impacts of a project can be determined and additional mitigation measures identified. Shortfalls in meeting mode share or other targets can be identified and remedied. The need and schedule for the implementation of additional mitigation measures will depend on the results of the transportation monitoring program. We ask the Secretary to require that the Proponent respond to this request by preparing a transportation monitoring program which addresses the details of how the mode share goals will be attained, including steps that will be taken if goals are not met. Ongoing consultation with MassDOT, the impacted municipalities, and MAPC should be an essential part of the TDM plan.

### **Shuttle Service**

MAPC is pleased that the Proponent has proposed a shuttle program which will operate between off-site parking facilities and the project, with local neighborhood stops along the route, and with headways ranging between 10-15 minutes. The DEIR assumes 44% of employees will park remotely and ride the shuttle and 20% of employees are expected to board/alight at neighborhood stops. MAPC looks forward to reviewing a more detailed response to the following questions and comments:

- The Proponent plans to lease approximately 750 spaces in three off-site parking facilities in Everett, Medford and Malden. Where are the exact locations, anticipated ridership, and number of parking spaces at each of the three proposed satellite parking locations, and where are the neighborhood stops?
- While the DEIR mentions a shuttle program for employees, explanation about how patrons will use the shuttle buses needs to be addressed in the FEIR. As noted in the DEIR, the majority of patron trips the project is forecast to generate will be entering and exiting from the south, 38% from I-93 and 15% from Rutherford Avenue. Satellite parking locations serving this significant segment of patron trips need to be designated.
- The Proponent should consider coordinating their shuttle services with Massport's Logan Express bus service. Logan Express has full-service bus terminals and secure parking in Braintree, Framingham, Woburn, and Peabody.
- There needs to be a strong incentive program that encourages both patrons and employees to use the shuttle service.

- The Proponent should consider providing MBTA passes to employees (Monthly Link Pass) as an incentive to use public transportation.
- In addition to coordinating shuttle service schedules with existing MBTA bus route schedules, it is important to ensure that the travel times and headways along the shuttle routes offer frequent service on a continuous basis.
- MAPC strongly encourages the Proponent to use a fleet of electric, CNG, LNG, or other alternative fuel vehicles for the shuttle service.
- Shuttle bus service for patrons should operate according to specific schedules and at designated locations for the sole purpose of providing transportation to individuals who have already decided to visit the casino. They should not operate in a “demand push” format, which can encourage addictive behavior and negatively impact lower-income communities and seniors. No inducements should be offered as part of the shuttle service.

## **Charter Buses**

The Proponent’s proposal for casino access for charter buses is alarmingly incomplete. While the DEIR does mention that bus parking will be located off-site within a few miles of the project, there is no mention of where this parking location would be or how many spaces are proposed to be allocated. The Proponent’s proposal for casino access by charter bus is not addressed. For example, will 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? Remote parking with shuttle access may be the preferred alternative since pick-up and drop-off at the main entrance may result in delay and queuing.

## **Water Transportation**

MAPC appreciates the Proponent committing to provide water shuttle services for both patrons and employees. MAPC looks forward to reviewing a more detailed response to the following questions and comments:

- The DEIR states that the water shuttle service will initially provide service with stops in Downtown (Long Wharf or Rowe’s Wharf) and South Boston (World Trade Center), with potential for expansion to other Boston Inner Harbor locations if demand increases. However, how will this water shuttle service connect with the Inner Harbor ferry terminal locations and existing water taxi services?
- Providing water transportation to and from Draw 7 Park in Somerville to promote access to Assembly Square in Somerville should be seriously considered.
- Will there be a fee for patron use of this service? A cost structure should be developed that would make water transportation a service competitive enough to attract a substantial number of riders.
- What is the anticipated timeframe that water transportation will be available considering there will be dredging and the boats will need to be custom designed due to height restrictions?

## **Impacts to the MBTA Maintenance Facility**

The Proponent is seeking to build the entrance to the proposed casino from Broadway across the southeast corner of the site. This access road would overlap with the main secure entrance to the MBTA Maintenance Facility, requiring that the entrance be relocated. This relocation would change the orientation and the use of the site because all employee and truck deliveries are made through an existing gated entrance. It is important to note that the Beacham Street/Broadway (Route 99) intersection is forecast to operate at LOS F for Friday and Saturday peak periods.

The Maintenance Facility is an essential backshop to MBTA services and operations and it is imperative that this facility remain accessible and available at all times for MBTA use. The Proponent proposes a new access road to service both the MBTA facility and to provide a Service Road into the Propoent’s site.

- How will this new entranceway function? It is critical that the Proponent ensures that delivery vehicles and employees can safely enter and exit the site and not interfere with existing MBTA operations.
- Can the entrance roadway be made wide enough so that access to the MBTA facility is segregated from vehicles headed to the project's access roadway? MBTA-related traffic must be fully segregated from all other traffic for operations, safety, and security reasons.

## **Truck Traffic**

MAPC acknowledges the Proponent proposes to reduce truck traffic along the segment of Lower Broadway (Route 99) between Beacham Street and the Boston City Line by making improvements to Robin Street and Dexter Street. In order to provide improved and safe access to the industrial and port area east of Lower Broadway, several questions remain regarding truck access and management:

- What are the estimated number, size, and frequency of trucks accessing the project site as well as other truck activity taking place nearby in the Lower Broadway industrial and commercial area?
- What percentage of truck trips are anticipated to access the project north of the project site and south of the project site?
- Although the DEIR contains a plan showing back of house access and egress, the FEIR should provide a plan depicting truck access and egress on a scale depicting the City of Everett and its surrounding communities.

It is important to note that while land uses are predominantly industrial and commercial in the Lower Broadway area, there is a residential population, many of whom are minority and/or low-income<sup>6</sup>. It is critical that access and routing for trucks be designed with pedestrian safety in mind.

## **Parking Fees**

The Proponent should propose parking policies and management strategies such as fees for parking and parking cash-out policies for employees that are designed to reduce parking demand and automobile use.

The FEIR should explain whether there will be a fee for patrons and employees to park. MAPC strongly encourages the Proponent to consider incorporating a fee which will fund the TDM program and/or mitigation for environmental impacts. As has been acknowledged in the DEIR, the Proponent needs to provide disincentives for commuters to view the project parking garage as a commuter location.

## **Pedestrian and Bicycle Access**

MAPC is pleased the Proponent has committed to strengthening pedestrian and bicycle connections to the site, specifically including an extension of the harborwalk along the Mystic River that will allow pedestrian and bicycle connections between Lower Broadway, Gateway Park, the Mystic River Reservation, and Wellington Station on the MBTA Orange Line subway system.

It is important that a connection is also provided to the Northern Strand Community Trail to the north. A designated part of the East Coast Greenway, a continuous planned trail along the east coast connection from Maine to Florida, the Northern Strand Community Trail involves developing a multi-use trail system that will ultimately link Everett, Malden, Revere, Saugus and the Lynn seashore with a ten-mile-long bicycle and pedestrian trail system.

## Assembly Square

Assembly Square is the site of an ongoing mixed-use, smart growth development project along the Mystic River in Somerville. A new MBTA Orange Line station at Assembly Square is planned to serve this new development. Sited between Sullivan Square and Wellington Stations, New Assembly Square Station is currently under construction and is

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<sup>6</sup> *Malden River Area Opportunities Plan*, Parsons Brinckerhoff, August 2012.

expected to be completed this year. As there is no direct roadway connection from Everett to New Assembly Square Station, the Proponent needs to recommend and implement an option for bicyclists and pedestrians to connect between the station and casino. Options including a new pedestrian/bicycle bridge and adding on to the commuter rail bridge should be examined.

### Gateway Connector Path

The Proponent should ensure that the Gateway Connector Path and proposed underpass improvements are implemented with full 24/7 public access. As mentioned in the *Everett Central Waterfront Municipal Harbor Plan (October 2013)*, this location has the potential to provide a strong connection to the site for pedestrians and bicyclists. In addition to providing access to the project site, this connection will promote the project's waterfront for public access and use. An additional connection for pedestrian and bicycle access should also be considered at Horizon Way connecting Gateway Center and the project site. There is also the consideration that Horizon Way access could provide additional emergency access for fire vehicles.

### Bicycle Parking

While the Proponent has indicated it will provide long term bicycle parking in the garage and short term parking throughout the site, the locations and amount of spaces have not been specified. In addition, on-site showers, lockers, and changing facilities, as well as financial incentives to encourage patrons and employees to bicycle to the site should also be included as part of the project.

### **Commuter Rail Access**

The Proponent plans to continue to explore with the City of Everett and the MBTA provision of a flag-stop on the Newbury/Rockport Line to serve both Everett and the project. Further study is needed to determine the location, accessibility and feasibility of this commuter rail stop. The study should address the impacts on the entire Newburyport/Rockport line, the effect on area MBTA bus routes, and estimated potential ridership. It is MAPC's position that a flag-stop on the Newburyport/Rockport line should be viewed as secondary to other area transportation options such as utilizing the MBTA Orange Line, MBTA bus routes, shuttle buses, and water transportation.

### **Casino-Related Vehicular Accidents and DUI**

Studies have shown that casino traffic is more prone to accidents, such as drunk-driving incidents, than regular traffic. The Secretary should require the Proponent to address the likelihood of an increase in accidents in the FEIR. The Proponent should take into account accidents involving patrons travelling to and from the project by vehicle, bicycle and foot, even when those accidents occur relatively far from the site itself. The Proponent should analyze the likelihood of whether the number of DUI-related accidents will increase and include a clear explanation of what steps will be taken to proactively minimize drunk driving and the accidents that may occur as a result (e.g., education programs, serving of alcohol, mitigation to Police, Fire and Emergency-management departments). MAPC has located several resources that address the likelihood that casino traffic is more prone to accidents. The resources and their key findings are summarized below. The Secretary should require the Proponent to review and respond to this information.

#### Chad D. Cotti and Douglas M. Walker, "The impact of casinos on fatal alcohol-related traffic accidents in the United States," *Journal of Health Economics*, 2010, pp. 788-796.

This study explored whether there is a link between casino expansion and alcohol-related fatal traffic accidents by looking at the timing and locations of casino openings over a 10-year period and isolating the impact of casino introduction on alcohol-related fatal accidents. Results indicate that there is a strong link between the presence of a casino in a county and the number of alcohol related fatal traffic accidents. Specifically, the study found that alcohol-related fatal accidents increased by 9.2 percent in counties with casinos.

#### Spectrum Gaming Group, *Gambling in Connecticut: Analyzing the Economic and Social Impacts*, June 22, 2009.

In 2009, Norwich, CT, located near Mohegan Sun and Foxwoods, reported that DUI arrests have more than doubled since 1992. The nearby towns of Montville and Ledyard also experienced significant increases. Roughly 20 percent of the motorists in Montville, Ledyard and North Stonington arrested for DUI acknowledged to police that their last drink was at a casino (page 13).



The report contains information from local police departments, the State Police, and the Department of Transportation that compares some of the towns close to the casinos with those of similar population that are much further away from the casinos. The comparison concluded that Norwich registered significantly more arrests.

Zach Lindsey, “Sands Casino linked to increase in DUIs by Northampton County report,”  
The Express-Times, July 22, 2012.

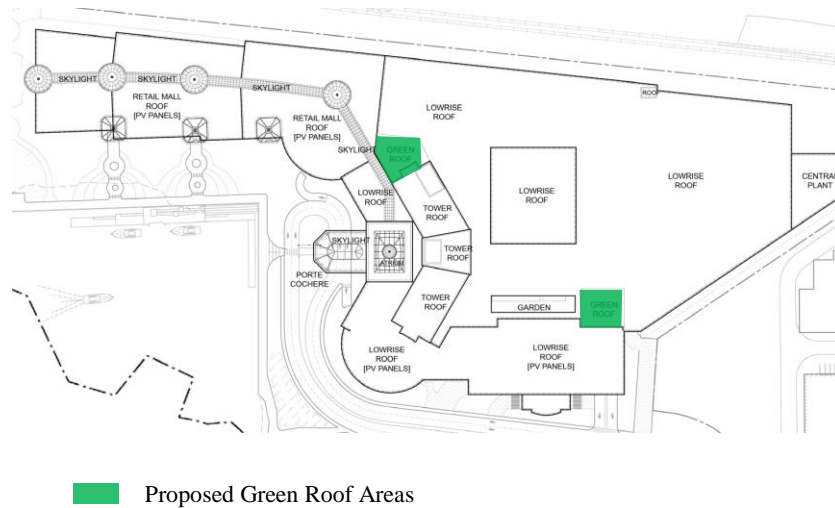
Drunken driving arrests were reported to have nearly doubled in Bethlehem, PA, after the Sands Casino Resort opened in 2009 while they have remained consistent in a nearby non-casino county, Northampton County.

## Chapter 91 and Municipal Harbor Plan (MHP)

The DEIR acknowledges that the proposed building height, setback, lot coverage, and water dependent use zone do not conform to standard Chapter 91 criteria, but explains that substitutions and offsets for these have been proposed in the Everett’s Municipal Harbor Plan (MHP). The MHP was submitted to EOEEA in October 2013 and is still under agency review. A concern from a MEPA perspective is the timing of the MHP final approval with respect to the MEPA review process. Since the MHP was not yet approved by the time this DEIR was filed, it will be important to ensure that the MHP process is concluded by the time the FEIR is filed.

## Stormwater

While MAPC typically advocates for the maximum feasible use of Low Impact Development techniques to manage stormwater, the DEIR demonstrates that there is limited opportunity on this site primarily due to extensive subsurface contamination. Limited use of tree box filters and bioretention swales are proposed on portions of the site with appropriate soil conditions. Green roofs are also proposed, however in only very small sections of the project’s roofs. The DEIR acknowledged that “the building’s roofs generate the vast majority of stormwater runoff... A portion of the building will be provided with rooftop planting or ‘green roof’ located on the northwest edge of the back of house service area.” While the text does not describe the size of the green roof area, Figure 2-8 shows two very small areas designated as green roofs:



MAPC recommends that the proponent expand the green roof areas to a more significant portion of the adjacent lower roof area to maximize the stormwater benefits. Given the lack of opportunity for other LID measures on the site and the predominance of roof areas as the source of runoff, green roofs should be a more significant part of the design. This relatively modest step would also give both the City of Everett and the Proponent a significant opportunity to demonstrate attention to environmental issues.

The stormwater section describes the components of the system qualitatively, but does not provide quantitative data on stormwater flows for storms of various magnitudes (design storms). These data have been developed, as evidenced by detailed printouts of HydroCAD calculations included in the appendix. This “raw” data output should be presented in

summary form in the FEIR to characterize the components of the stormwater management system for each design storm. In order to address potential climate change impacts of more intense rainfall, the stormwater analysis should also include a scenario based on the rainfall estimates of the Northeast Regional Climate Center (NRCC), as an alternative to the standard Natural Resources Conservation Service estimates.

### **Hazardous Waste and Massachusetts Contingency Plan Compliance**

Considering that site contamination is one of the most significant challenges facing the proposed project, the DEIR provides scant information on this critical topic. The six-page chapter on Solid and Hazardous Waste provides a very general description of previous site investigations and the contamination found on the site, and concludes with a brief discussion of MCP compliance. The FEIR should provide significantly greater detail about the location and extent of various contaminants, including summary tables, site plans and graphics to provide much greater specificity. Likewise, the proposed strategy and plans for site remediation, including cost estimates as required by the MEPA Certificate on the ENF, should be provided in the FEIR. Finally, the timing of MCP compliance activities with respect to the MEPA review process raises concerns. Site remediation plans should be finalized before the Final EIR is filed. It should not be left as an outstanding unresolved issue when the Secretary issues the Certificate on the FEIR.