



SMART GROWTH AND REGIONAL COLLABORATION

March 27, 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, SFEIR

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.

Since the filing of the Final Environmental Impact Report (FEIR), the building program has increased by 58,000 square feet to a grand total of 3,096,700 square feet. While the overall building footprint remains the same, changes to the building program include adding 125 hotel rooms, increasing the square footage of the convention and meeting space, eliminating the nightclub, and slightly reducing the square footage of retail and dining space. Since the filing of the FEIR, the amount of on-site parking has decreased by 300 spaces. Of the 4,200 spaces now in the parking program, 3,400 are on-site and 800 are off-site.

The project is forecast to generate 1,332 vehicle trips during the Friday afternoon peak hour (4:30-5:30 PM) and daily vehicle trips will increase to 1,756 during the Saturday afternoon peak hour (2:45-3:45 PM). Although the increased number of trips is not projected to cause traffic impacts during peak hours with the new building program, the estimated number overall daily trips on a Friday is forecast to increase by 3.3%.

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 Supplemental Final Environmental Impact Report (SFEIR) and has concerns that primarily address the off-site parking program and the need to develop a mitigation program due to increased demand on the public transit system. 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 SFEIR Certificate issuance and require the Proponent to address our concerns.

Thank you for the opportunity to comment on this project.

Sincerely,

Marc D. Draisen
Executive Director

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

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

Off-Site Parking Program

Off-Site Parking Locations

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 SFEIR, 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. However, 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 still need to be determined. MAPC is very concerned that these critical components of the off-site employee parking program have not been provided as part of the MEPA review process. The details of the off-site parking program should be resolved in the subsequent permitting and design phase with the municipalities and any measures required to mitigate impacts at the three sites should be included in the Secretary’s Section 61 Findings.

MAPC also has concerns regarding the Proponent’s conclusions in the SFEIR regarding the planned leasing of space for off-site employee parking. On page 2-86, the SFEIR claims that off-site employee parking will be “sufficient to accommodate the projected employee parking demand of 365 spaces.” However, on page 2-75, there is a contradictory statement cautioning that “overlapping employee shifts required to ensure that positions are appropriately staffed may result in parking demands that could be approximately twice that of the projected peak parking demand.” The Proponent needs to provide further analysis regarding congestion and capacity issues that could result with employee shift changes at each of the three off-site parking locations.

MAPC respectfully requests that the Proponent provide further information pertaining to these additional concerns regarding off-site parking:

- While the proposed parking in Everett will most likely be new parking, the sites in Medford and Malden are in existing and well-utilized facilities. Do these facilities have available capacity for the Proponent’s planned use while still serving current parking patrons? Will any current users be displaced, and if so, where will they relocate? Any such displacement should be mitigated by the Proponent.
- The traffic impacts and parking demands of the off-site parking program should be determined by on-site monitoring at all three locations, not by simply administering surveys as the Proponent currently proposes.
- An estimated 40 private charter buses will access the project site daily. While the SFEIR mentions that private charter buses will pick-up and drop-off riders at the project site, where will they be staged?

Premium Park and Ride

The SFEIR mentions that the Proponent plans to operate a Premium Park and Ride (PPR) service that will, if possible, share excess parking at two or three of Massport’s Logan Express facilities in Braintree, Framingham, and/or Woburn. PPR service would be modeled on Massport’s Logan Express service, which provides a non-stop bus ride between Logan Airport and one of four Massport parking lot locations in Braintree, Framingham, Woburn, and Peabody. The Proponent proposes that both employees and patrons who choose to use the PPR service would not be charged, thus providing an incentive to use the service. If spaces are not available at Massport’s Logan Express parking facilities, the Proponent will lease spaces at proximate parking facilities.

While this appears to be a viable concept, additional information needs to be provided which, at a minimum, should identify specific parking locations and associated number of spaces. If a PPR service is implemented, then leases with Massport should be short-term and give priority to accommodate airport patrons, should that demand increase. In addition, the PPR service should be evaluated by on-site monitoring.

Transit Demand and Impacts to the Transit Network

While the Proponent has committed to an extensive mitigation program for roadway improvements, mitigation for public transportation is minimally addressed. MAPC believes strongly that transportation impact mitigation should not be limited solely to roadways. The Proponent's project has an integrated public transportation component as part of its transportation program. Although the SFEIR states that MBTA bus and Orange Line operations will satisfactorily serve project patrons and employees, and that the additional ridership will not adversely affect future operations, that is hardly an assurance of optimal performance. In spite of this claim, MAPC believes that public transportation will likely be strained by the substantial addition of new passengers.

To off-set potential impacts, the Proponent should partner with the MBTA by contributing to both the operating and maintenance costs of area bus service and the Orange Line in an amount that is reasonably related to the project's additional demand and its impact on MBTA services. Specific thresholds should be determined collaboratively between the MBTA and the Proponent. It is important to note that *Hub and Spoke*¹, a report recently completed by Northeastern University, concluded that the Orange Line already has congestion and capacity issues.

It is also worth mentioning that the SFEIR notes the revised analysis of Orange Line peak loads for weekday and weekend service between Wellington and Back Bay as outlined in MassDOT's FEIR comment letter is unresolved (Table 1.3 MassDOT Coordination Summary, page 1-20). This issue needs to be addressed by the Proponent in concert with MassDOT and the MBTA.

Transportation Monitoring Plan

The Proponent proposes an extensive post-development transportation monitoring and reporting program. The program includes annual data collection of traffic counts, parking, public transportation, and travel modes. The Proponent has committed to conducting regular monitoring and reporting of transportation mode shares and adjusting the project's alternative transportation services and transportation demand management (TDM) programs as necessary. The monitoring program will begin prior to initial occupancy of either the hotel or gaming components of the Project, whichever occurs first, and will continue for a period of 10 years. Most importantly, the Proponent agrees to monitor and adhere to a strict mode share goal. Specifically, no more than 71% of patrons and 0% of employees² will arrive by automobile respectively. Including the segment of each employee trip in a Single Occupancy Vehicle (SOV), 41% of trips will involve SOV modes and 59% will be via non-SOV modes.

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.

As stated earlier, in addition to the on-site data collection proposed in the SFEIR, the transportation monitoring plan needs to include monitoring of the three off-site parking locations to ensure that they are working effectively. If not, the Proponent will need to implement adjustments to the off-site parking program. Furthermore, as indicated above, the PPR program should also include data collection and monitoring if it is implemented.

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 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. MAPC is pleased that the Proponent has committed to complete all proposed roadway improvement mitigation prior to project opening.

¹ *Hub and Spoke*, Core Transit Congestion and the Future of Transit and Development in Greater Boston, Northeastern University, June 2012.

² Does not include the limited number of Wynn executives and employees with disabilities.

Summarized below are specific issues MAPC has concerning Route 99 and Sullivan Square/Rutherford Avenue:

Roadway Changes to Integrate Bus Service along Route 99

In addition to serving as a primary access route to/from Boston, Everett, Malden, Medford, and Somerville, three MBTA bus lines (104, 105, and 109) traverse the Route 99 corridor in the vicinity of the proposed project. While MAPC acknowledges that the Proponent proposes relocating bus stops in closer proximity to the project site's primary driveway as well as other improvements such as sidewalks and bicycle lanes, additional improvements are necessary to facilitate bus service along this corridor. Specifically, these improvements include collaborating with the MBTA to ensure bus arrival and departure times are synchronized with employee shift changes, enhanced bus shelters (e.g., with real-time message boards), signal priority for buses, dedicated bus lanes, and other "bus rapid transit" (BRT) features. Enhancing the Route 99 corridor for bus service will encourage patrons and employees accessing the project site to use this mode of transportation. MAPC expects that further integration of bus service will be addressed as the Proponent continues to collaborate with the City of Everett, MassDOT and the MBTA as the design of Route 99 advances, and we urge the Secretary so to require in his Certificate.

Sullivan Square/Rutherford Avenue

According to the terms of its Gaming License, the Proponent has agreed to make a payment equal to \$25 million toward implementing a long-term solution for Sullivan Square and Rutherford Avenue. In addition, the Proponent has agreed to an annual payment of \$20,000 per additional vehicle trip entering and leaving the project using Sullivan Square during the Friday peak hour. This payment is for the first 10 years and is capped at \$20 million. According to the SFEIR, discussions are underway with MassDOT, the MBTA and the Boston Transportation Department (BTD) regarding the refinement of the mitigation program as the project moves toward final design and construction.

Congestion at the Exit 28 ramp on I-93 and through Sullivan Square is a significant concern. In its comment letter addressing the FEIR, MassDOT noted that a queue of 667 feet (27 vehicles) would occur on the Cambridge Street eastbound approach during the Friday PM peak hour under the build-mitigated scenario. In the SFEIR, this queue has increased to 727 feet. Showing no improvement compared to No Build conditions, this queue would still extend beyond the I-93 northbound exit ramp and could result in lengthier queues on the ramp itself.

As the Proponent finalizes design plans in consultation with MassDOT, the MBTA, and the BTD, it is critical that they support implementation of the City of Boston's long-term plans for Sullivan Square and Rutherford Avenue. The City of Boston's multi-year effort to create a "new neighborhood" in the City is highly consistent with the Commonwealth's Sustainable Development Principles, the regional plan *MetroFuture*, as well as MassDOT mode-shift goals and Green DOT programs³. This vision will likely be compromised by the proposed project's increase in vehicular traffic. It is imperative that this area be closely monitored post-development, and that every effort is made to minimize and mitigate negative impacts that endanger the City's plan for the neighborhood.

Pedestrian and Bicycle Access

The Proponent will contribute up to \$250,000 to 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. MAPC supports further study that may advance this potential connection. The primary purpose of this connection is to join one of the key missing gaps in the planned active transportation greenway between the North Shore and Boston. This connection also provides key access between public transportation in Assembly Square and destinations in Everett across the Mystic River.

³ 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.

To improve non-motorized access between the site and points north, the Proponent should work with the MBTA to extend the Bike-to-the-Sea trail along the MBTA right-of-way beneath Revere Beach Parkway to the project site. This link will provide a safe car-free alternative to the Project site.

Parking Pricing Strategies

MAPC is pleased that the Proponent will evaluate and monitor pricing strategies for managing on-site parking in a manner that will appropriately serve visitors while also supporting the goal of reducing SOV trips and encouraging use of public transportation. These strategies include implementing a revenue control system, discouraging parking during peak traffic and parking demand periods, and providing guest rewards for arriving at the site by means of modes other than SOV. Although the SFEIR states that parking pricing strategies will be summarized in an annual report that will be provided to MassDOT and the Massachusetts Gaming Commission, the report should propose adoption of new pricing strategies, if necessary.