



SMART GROWTH AND REGIONAL COLLABORATION

May 26, 2023

Rebecca Tepper
Secretary of Energy and Environmental Affairs
MA Executive Office of Energy & Environmental Affairs
Attention: Alexander Strysky, MEPA Office
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: Encore Boston Harbor, Supplemental Draft Environmental Impact Report, EEA No.15060

Dear Secretary Tepper:

The Metropolitan Area Planning Council (MAPC) regularly reviews proposals deemed to have regional impacts. The Council reviews proposed projects for consistency with *MetroCommon 2050*, MAPC's regional land use and policy plan, consistency with Complete Streets policies and design approaches, as well as impacts on the environment.

Wynn MA, LLC, the Proponent, has submitted a Supplemental Draft Environmental Impact Report (SDEIR) for the construction of a new multi-use commercial development of approximately 1.8 million square feet (sf). The proposed development, known as the Revised Project, includes a theater, entertainment venues, two hotels, food & beverage facilities, retail facilities, a warehouse support facility, three parking garages, and a pedestrian bridge spanning Broadway. The Revised Project covers an area of approximately 13.2 acres in Everett's Lower Broadway area, generally bordered by Dexter Street to the south, Robin Street to the east, Beacham Street to the north, and Broadway to the west. The Revised Project is an expansion of the existing Encore Boston Harbor casino.

The Revised Project is proposed to be carried out in multiple stages. The first phase (Phase 1) will include a 999-seat theater, a 200-seat comedy club, a gaming area of approximately 18,700 sf, food & beverage space of around 50,700 square feet with sports betting, and a pedestrian bridge over Broadway (Route 99) that connects directly to Encore Boston Harbor. The remaining development (Future Phases) will include approximately 600,000 sf of hotel space with approximately 800 rooms, 20,000 sf of event space, 30,000 sf of food & beverage facilities, 20,000 sf of retail space, and a 60,000 sf warehouse. Since the Notice of Project Change (NPC) was filed, the Revised Project's plan remains mostly unchanged, except for the addition of a 0.3-acre parcel located at 115 Broadway.

The MBTA serves the Broadway corridor by multiple bus routes and also provides transit service via the Orange Line at the nearby Wellington, Malden, Sullivan Square, and Assembly Stations. On Saturdays, it is projected that the project will result in approximately 10,845 adjusted daily vehicle trips from patrons and 3,135 adjusted daily vehicle trips from employees¹. The SDEIR proposes 3,092 parking spaces.

MAPC has considerable concerns about any development that increases the region's financial and economic dependence on gambling. Gambling and the addiction that often accompanies it, always hurts lower-income populations worst of all. The region's interests are best served by encouraging a more diversified set of business enterprises, including the addition of both market-rate and affordable

¹ The Revised Project is forecast to generate 10,695 adjusted Friday daily patron trips by vehicle and 3,047 adjusted Friday daily employee trips by vehicle.

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housing. After reviewing the SDEIR, MAPC is further concerned that the proposed highly auto-dependent use of this land will exacerbate environmental issues and increase greenhouse gas emissions (GHG), at precisely the time when the state must reduce emissions in order to comply with goals that mandated by statute.

More specifically, our concerns and recommendations focus on the proposed amount of parking and the goals for mode share. We respectfully ask the Secretary to require that the Proponent adequately address these concerns in their next MEPA filing. It is worth noting that many of MAPC's concerns align with those expressed in the Secretary's Expanded NPC Certificate (dated January 6, 2023), MassDOT's comment letter (dated January 4, 2023), and the City of Boston's comment letter (dated December 30, 2022).

Parking

We are disappointed and alarmed that the Proponent has made no effort to reduce the amount of parking. In fact, the Proponent has put forth a plan to increase the number of parking spaces from the original NPC filing. Initially, the NPC proposed 2,381 parking spaces, whereas the SDEIR now proposes an increase of 711 spaces, bringing the total to 3,092 spaces.

Implementing a parking strategy that avoids excessive parking construction would promote and strengthen the utilization of alternative transportation modes to access the Revised Project. This includes encouraging use of the Orange Line, MBTA buses, shuttle services, as well as walking and cycling, while minimizing reliance on private vehicle travel.

On the other hand, over-construction of parking spaces will encourage auto trips to/from the site, reduce the use of transit and other means of access, and increase GHG attributable to the development, contradicting mandated state goals. MAPC respectfully urges the Secretary to ensure that the Proponent significantly decrease the number of spaces in their next MEPA filing.

Specifically, MAPC asks the Proponent to address the following in a clear and direct manner:

Increase in Parking from NPC to SDEIR

The NPC proposed 2,381 new parking spaces. Subsequently, the total number of parking spaces in the SDEIR rose by 711, reaching a total of 3,092. The Proponent needs to provide a valid rationale and clarification for this increase in parking spaces, considering that there were no modifications to the building program from the NPC to the SDEIR.

Phasing of Parking

Phase 1 of the Revised Project is expected to comprise a relatively modest 122,000 sq feet of development (entertainment, food & beverage, gaming, and front-of-house)². However, Phase 1 also entails the aforementioned addition of 2,398 parking spaces. The Proponent must provide substantial justification and clarification for the excessive allocation of parking at this stage. We acknowledge the Proponent's initial response to this question, stating, *"This garage location is viewed as the best location*

² Total on-site GFA without garage and pedestrian bridge. Refer to Table 1-2 of the SDEIR.

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and facilitates construction of future phases that will eliminate surface parking lots.” (pp 8-20 and 8-31) This explanation is woefully insufficient. Furthermore, the Proponent asserts for the first time that these parking spaces will help meet the unmet demand for approximately 400 parking spaces at the existing Encore site. The SDEIR provided no evidence supporting this claim, and we further note that Transportation Demand Management (TDM) measures could also help to address any shortfall that may currently exist.

Parking Pricing Strategies

We recommend that the Proponent introduce a substantial parking fee at both the existing and proposed development sites to promote the goal of reducing car trips and encouraging the use of alternative modes. MAPC encourages the Proponent to consider using the revenue generated by these fees to support the TDM program and/or to mitigate environmental impacts. We note that the Secretary’s Certificate states that the Proponent should follow the guidance provided in the Lower Mystic Regional Working Group study and consider implementing strategies that include parking pricing³.

Off-Street Parking

How are the existing 800 off-site parking spaces designated for employees taken into account as part of the Proponent’s parking program?

Community Parking

Clarify the meaning and purpose of "Community Parking" as mentioned in Table 3-68: Additional Parking Requirements. Would this parking be made available to individuals who are not patronizing the Encore Boston facilities? If so, what other destinations is the parking intended to serve?

Mode Share Goals

According to the Proponent's estimate from the 2021 Encore Transportation Monitoring Program, a majority of employees, approximately 84%, commute to the site using their personal vehicles. Similarly, approximately 92% of patrons arrive at the site either by using their own vehicles or by taxi/ride-hailing services⁴. The use of public transportation, specifically MBTA buses, is significantly lower, with only 5% of employees using this option and 7% using the Everett employee shuttle. A similarly low percentage applies to patrons utilizing MBTA buses (2%) and the Orange Line (4%)⁵.

MAPC is encouraged to see that the Proponent has set higher mode share targets for employees. They estimate that 40% of employees will use the Employee Shuttle, 10% will use the MBTA Bus, and 47% will access the site by auto. However, there is room for improvement on patron mode share targets, particularly for MBTA buses and the Orange Line. According to the SDEIR, only 8% of patrons are projected to use the Orange Line, while 5% are expected to use MBTA buses. The percentage of patrons accessing the site by auto remains significantly high at 84%⁶.

³ Secretary’s Expanded NPC Certificate, January 6, 2023, page 22.

⁴ Of the 92%, 57% will arrive by auto and 35% by taxi or ride-hailing. Refer to Table 3-20 of the SDEIR.

⁵ Table 3-20: Employee and Patron Existing Mode Shares of the SDEIR.

⁶ Of the 84%, 52% will arrive by auto and 32% by taxi or ride-hailing. Refer to Table 3-36 of the SDEIR.

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It is essential that the Proponent adopt more aggressive goals, especially for patrons. The Proponent should also ensure that an adequate monitoring program continues, and they should commit to specific actions designed to achieve those goals, including but not limited to a reduction in the number of parking spaces, which will encourage employees and patrons to use non-auto means to access the site.

Lower Mystic Regional Working Group

The Secretary's Certificate and comment letters from MassDOT, Boston, and MAPC all mention following the guidance provided in the Lower Mystic Regional Working Group (LMRWG) study. Specifically, the Secretary's Certificate states: *"The number of parking spaces is excessive given the Proponent's involvement in the Lower Mystic Regional Working Group (LMRWG) study, which recommended reducing parking supply to encourage alternative modes of transportation. The Proponent should follow the guidance provided in the LMRWG study and consider implementation strategies such as parking pricing or shared parking and evaluate how the proposed parking supply could be reduced by implementing employee shuttle buses from transit stations."* (p 22)

MAPC was astonished to read that the Proponent not only dismissed the policies and recommendations put forth by the LMWRG, but also asserted their irrelevance to this specific project. After more than two years of collaboration among numerous stakeholders involved in planning for the future of the Sullivan Square area, the LMWRG concluded that *"the primary answer to overcoming the area's transportation challenges amidst its ongoing growth is the robust expansion of public transit services, to be supplemented by other transportation infrastructure improvements and coordinated with changes in local development policies that will support the modal shift from private vehicles to public transit, walking and cycling."* (p 5) The study further emphasizes the need to *"enact innovative transportation demand management policies to limit single occupant vehicle commuter trips to and from major new job centers in the Lower Mystic area."* (p 8) It is noteworthy that the Proponent actively participated in the [study](#) and even provided funding for it, which makes their dismissal of its findings particularly surprising to MAPC.

It is imperative for the Proponent to provide a clear and effective program aimed at significantly and meaningfully enhancing the utilization of the Orange Line, MBTA bus routes, the Everett employee shuttle, walking/biking options, and the water shuttle for both employees and patrons. Considering the Revised Project's proximity to multiple transportation options, we believe this objective can be achieved.

Conclusion

MAPC has a long-term interest in alleviating regional traffic and environmental impacts, consistent with the recommendations of *MetroCommon 2050*, including *"reducing vehicle miles traveled and the need for single-occupant vehicle travel through increased development in transit-oriented areas and walkable centers"*,⁷ and *"improving accessibility and regional connectivity"*⁸. Furthermore, the Commonwealth has a statutory obligation to reduce GHG emissions by at least 50% from 1990 levels by 2030, 75% by 2040, and 85% by 2050, in order to achieve net zero emissions by 2050.

⁷ <https://metrocommon.mapc.org/announcements/recommendations/2>

⁸ <https://metrocommon.mapc.org/announcements/recommendations/1>

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In its current form, this very substantial project is likely to have very damaging impacts on the environment and negatively impact our emission goals, primarily due to the proposed number of parking spaces.

To minimize adverse impacts and to keep the Commonwealth on track in meeting its regulatory and statutory goals, MAPC respectfully requests that the Secretary not allow this Project to advance until the Proponent agrees in their next MEPA filing to reduce the amount of proposed parking, and adopts the other recommendations included in this letter.

Thank you for the opportunity to comment on this project.

Sincerely,



Marc Draisen
Executive Director

cc: Jay Monty, Everett
Jim Fitzgerald, Boston
Brad Rawson, Somerville
David Mohler, MassDOT
Brian Arrigo, DCR
Joe Delaney, Massachusetts Gaming Commission