



SMART GROWTH AND REGIONAL COLLABORATION

October 10, 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, Final Environmental Impact Report, EEA #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. 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.

Wynn MA, LLC, the Proponent, has submitted a Final Environmental Impact Report (FEIR) for additional multi-use commercial development of approximately 1.84 million square feet including a theater, entertainment venues, two hotels, food and beverage (F&B) facilities, retail facilities, a warehouse support facility, parking garages, and a pedestrian bridge connecting to Encore's existing facility on Broadway (the "Project"). The Project spans approximately 13.4 acres of land in the Lower Broadway area of Everett and seeks to transform an underutilized area across the street from Encore Boston Harbor into a mixed-use entertainment district, including a 999-seat theater, 200-seat comedy club, 18,700 square foot (sf) gambling area, 80,700-sf of F&B space, 941,800-sf of parking garage space, and a 12,500-sf pedestrian bridge over Broadway. The Project also includes public realm improvements such as new sidewalks, street trees, and landscaped plazas.

The Project is proposed to be constructed in multiple phases. The first phase, Block A or Phase 1, will include a 740,500-sf parking garage, 12,500-sf pedestrian bridge over Broadway, and 152,600-sf of development space. The 152,600-sf development space will be comprised of gambling (18,700-sf), F&B (50,700-sf) entertainment venues (72,700-sf), and front-of-house (10,500-sf). The Proponent will build Phase 1 on the 6.4-acre block bounded by Mystic Street to the north, Robin Street to the east, Dexter Street to the south, and Broadway to the west. The remaining development (the "Future Phases") will include approximately 931,300-sf of development space that will be comprised of hotel space (600,000-sf), event space (20,000-sf), F&B facilities (30,000-sf), retail space (20,000-sf), 201,300-sf of parking, and a 60,000-sf warehouse. The Proponent proposes a total parking supply of 2,640 spaces. Of the 2,640 spaces, 2,137 spaces are proposed to be constructed for Phase 1 and the remaining 503 spaces will be in Future Phases.

Upon full completion, the Project is projected to generate over 10,000 patron and employee trips per weekday. According to the Proponent, the predicted motor vehicle CO₂ emissions generated by this project will be 808.6 tons/year. **As this project creates significant new vehicle trips, making it difficult for the Commonwealth to achieve its robust climate reduction goals, MAPC urges the Secretary to require the Proponent, as appropriate mitigation, to reduce the proposed parking, invest in public**

transit improvements, and advance additional transportation demand (TDM) efforts. Our specific recommendations are outlined further in this letter.

Since the filing of the Supplemental Draft Environmental Impact Report (SDEIR), the building program has not changed. However, the Proponent has reduced the number of parking spaces by 452 in the Project's Future Phases, and a number of significant and highly impactful transportation demand management (TDM) measures have been added or strengthened. We commend the Proponent for committing to a robust suite of TDM services, which will help to reduce single occupancy vehicle (SOV) trips to and from the site, while also decreasing harmful emissions and lowering overall congestion in the neighborhood and surrounding areas. The City of Everett has become a regional leader in transportation innovation and commitment to sustainable mobility, and the Proponent's suggested measures support that. We hope the Proponent, as an anchor member in good standing of the Lower Mystic TMA, will continue supporting the **creation and expansion of a local shuttle service** (tentatively named the "Everett Neighborhood Runner") and that they will also work with the TMA to **introduce vanpooling services** for employees of Encore and other TMA member companies.

We applaud the Proponent for providing \$7 million in Linkage Fees to the City of Everett for the creation of affordable housing. This will not only help to address the Boston region's severe housing shortage, but it will also enable more of Encore's own employees to live within the community where they work and to benefit from the many free and affordable transportation options available, including those the Proponent is committing to fund, such as the Bluebikes bikeshare system and expansion and improvement of the Silver Line from Chelsea to Sullivan Station in Boston. However, in order to meet both the Commonwealth's ambitious climate goals¹ and the Proponent's own mode share reduction target for trips made by auto or taxi/rideshare (from 85% to 38% for employees and from 93% to 87% for patrons (Table 3-1 on page 3-3)) we urge the Secretary to require that the Proponent take the following actions:

Support and Invest in the MBTA Silver Line Extension (SLX)

We recognize that the Proponent has long supported the MBTA's efforts to study, propose, and work towards an expansion of Silver Line 3 service from its current terminus in Chelsea, and that they have committed to dedicating 13 feet of ROW to the City of Everett as well as \$1 million for the design and implementation of dedicated bus lanes on Lower Broadway. We also note that the Proponent acknowledges the potential benefits of improved transit service on Lower Broadway, stating in Section 3.3.3.1, "*If an alternative transit option serving Lower Broadway is implemented, it would benefit the Project Site by providing additional transit options for patrons and employees.*" (page 3-38)

While the Silver Line Extension (SLX) project has only recently completed its Route Alternatives Analysis, it is that the preferred route will be Alternative 3, which travels Lower Broadway and directly serves the proposed project site and the existing Encore Boston Harbor. An official announcement from MassDOT and the MBTA is forthcoming and is expected to include that the project will be moving forward to design and construction with funding commitments in the next State Capital Improvement Plan (CIP). In

¹ [Global Warming Solutions Act Background | Mass.gov](#)

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light of this promising trajectory for regional transit expansion and improvement on Lower Broadway, **we urge the Proponent to respond positively to the MBTA's request for an additional \$5 million for construction of bus priority facilities specifically related to the SLX.**

It is important to recognize that the level and quality of service envisioned by the Silver Line Expansion is of much higher quality and greater magnitude than what riders currently experience on the MBTA bus system and much of the existing Silver Line. As reflected in Section 3.3.3.1 (page 3-38), the SLX will set the stage for true Bus Rapid Transit (BRT)², with features including exclusive rights of way, median aligned lanes and iconic stations, platform level boarding, and transit signal priority. The Proponent has an unmatched opportunity to work with the MBTA as a flagship partner on the new transit service, and to elevate that service in ways that supersede what the MBTA could do alone. Demand for this service could be further advanced through potential branding of the stations and fleet, naming and designing the infrastructure to reflect the Proponent's investments, and direct marketing of the service as the mode of choice for all people accessing the facilities, including employees as well as patrons.

It is also worth noting that the City of Boston is actively pursuing plans to improve transit, advance bus priority, and support active transportation on key roads, intersections and bridges leading to Encore, including Rutherford Avenue, Sullivan Square, and the Gilmore Street bridge. These investments provide a runway for the Silver Line Extension to add service beyond the currently proposed terminus at Sullivan Station, thus unlocking direct rapid transit access between Encore and Somerville, Cambridge and downtown Boston. It behooves the Proponent to seize this opportunity to invest in the SLX on Lower Broadway as a means of achieving or even exceeding their own mode share goals and setting forth a blueprint for a future where the majority of trips not just to and from their facility but throughout the region are taken by transit or other non-SOV modes. Such outcomes will be critical to addressing the dangerous impacts of climate change which are exacerbated by emissions from motor vehicles.

Strengthen Transportation Demand Management (TDM)

In the spirit of the Proponent's commitment to TDM, we urge them to subsidize fully all employees' MBTA passes, not just for one month and at 60% thereafter. Recent public polling³ has revealed that cost is almost always a top deciding factor for commuter mode choice, and that making transit free leads to more people choosing to use it, especially when parking is *not* free. We believe the non-SOV mode share for employees can be significantly increased through the robust combination of providing fully subsidized transit passes, free Bluebikes memberships, free vanpool and shuttle options and, most importantly, no free onsite parking - for both employees and patrons. We recognize that current employee parking options are all off-site with free shuttle service and we support the continuation of this arrangement in the next phase of development. We also emphasize that the ability of the Lower Mystic TMA, and all TDM efforts, to reduce congestion and increase participation in multimodal commuter options is severely diminished by the availability of free parking. Therefore, to support the TMA as well as the City of Everett, which has implemented aggressive TDM measures through its own

² [What is BRT? - Institute for Transportation and Development Policy \(itdp.org\)](https://www.itdp.org/what-is-brt/)

³ <https://www.massincpolling.com/the-topline/poll-residents-sound-the-alarm-on-mbta-service-quality-safety>

local zoning and planning policies, **we strongly recommend that the Proponent charge a fee for all onsite parking**, as initially implemented during the opening phase of the adjacent facility in 2018.

Address Parking Demand Management

MAPC acknowledges that the Proponent has reduced the number of spaces by 452, resulting in a total parking supply of 2,640 spaces. That said, MAPC still has significant questions and concerns regarding the additional parking analysis presented in the FEIR. Based on the information provided, **we firmly believe that it is entirely feasible to decrease the amount of parking further, by a minimum of 500 additional spaces**. Such reductions in parking will promote the utilization of public transportation in this area which, as noted above, is slated for dramatic improvements by way of the Silver Line Extension as well as Bus Network Redesign and the redesign of Rutherford Avenue. The benefits of these improvements will be undermined by an overabundance of mostly free parking, as proposed in this FEIR. Further, MAPC emphasizes that, as outlined in [PLAN: Charlestown](#), released by the BPDA last summer, Boston aims to reduce parking strategically in anticipation of significant forthcoming investments in public transportation and multimodal networks within and near Charlestown.

Parking Inefficiencies and Operational Capacity

MAPC strongly opposes the Proponent's proposal to increase the number of parking spaces by 25% using a combination of a 15% factor for Operational Capacity and a 10% factor for so-called Parking Inefficiencies. According to the Proponent, Operational Capacity pertains to the "ability to find a vacant parking space," and Parking Inefficiencies include "vehicles utilizing two spaces, oversized vehicles, or skewed parkers, creating undesirable adjacent spaces, along with spaces temporarily reserved to allow for scheduled maintenance."

The application of these arbitrary terms and percentages to expand parking capacity deviates from the standard MEPA parking analysis practices. The terms "Operational Capacity" and "Parking Inefficiencies" are not used by the Institute of Transportation Engineers, either in the Parking Generation Manual or in the Trip Generation Handbook.

Accepting these obscure mechanisms for expanding parking supply would set a dangerous precedent for future developments throughout the Commonwealth but particularly in neighboring communities where a Proponent seeks to provide more parking than is required or recommended, often at the expense of housing, green space and climate action efforts. Therefore, **MAPC respectfully urges the Secretary to insist on the removal of this unconventional methodology and to require the Proponent to reduce the proposed parking program by a minimum of 500 spaces**.

Parking Program

We note that the Proponent has mentioned, "*As new or improved modes of transportation serve the district in the future such as increased MBTA bus service in dedicated bus lanes, better access to the Orange Line at Assembly Row and Sullivan Square, and a commuter train station, the Project program may not require as much parking as currently forecast, and portions of the parking could potentially be allocated for future projects.*" (page 3-53) and "*If transit services in the area increase, the phased nature of the Project provides the opportunity to adjust the development to ensure the Project is a vibrant*

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district with right-sized parking." (page 3-53) MAPC underscores that enhancements to public transportation options are currently becoming available. It would be more appropriate for the Proponent to seek an additional parking allowance in the future, if planned service does not materialize, rather than to overbuild parking, which is unlikely ever to be removed, even if transit improves. Consequently, **the Proponent should not plan to incorporate the proposed 503 parking spaces for Future Phases Blocks B, C, and D unless demand warrants.**

MAPC acknowledges the Proponent's commitment to conduct re-evaluations for each block's development. This will be a critical practice to retain as demand for parking is likely to shift over time as a result of rapid transit improvements and application of an aggressive TDM program. As such, it's essential to highlight that Phase 1 – Block A proposes to frontload 81 percent of the 2,640 parking spaces, with the remaining 19 percent slated for Blocks B, C, and D. **In addition to not including parking for Blocks B, C, and D, the parking spaces proposed for Phase 1 – Block A need to be reduced accordingly.**

Hotel Parking

Table 3-33, *Parking Demand Summary for the Project*, indicates an adjusted parking demand of 756 spaces for the two proposed hotels, which would together comprise 800-rooms with a 0% internal capture rate (that is, the portion of trips generated by a mixed-use development that both begin and end within the development). Table 3-35, *Parking Demand Summary for Encore*, identifies that the existing 671-room hotel has an internal capture rate of 70%, resulting in an adjusted parking demand of 190 spaces. This clearly indicates that the allocation of 756 spaces for the two proposed hotels is excessive. Applying the same 70% internal capture rate for the two proposed hotels as was used for the existing hotel would necessitate 227 spaces, not 756 spaces. We also point out that the Proponent has proposed a parking ratio of 0.95 spaces per room whereas PLAN: Charlestown has put forth a parking ratio of 0.2 spaces per room for future hotel projects. Such a discrepancy stands in direct conflict with a neighboring municipality that is working to reduce vehicle trips by limiting parking in new development and the Proponent, who is proposing to do the opposite.

Community Parking

The Proponent has identified that there are currently 711 parking spaces in the Lower Broadway community parking lot, which are used by the public and nearby small businesses. The Proponent has proposed 25 community parking spaces to support public waterfront access and other neighborhood businesses. It is unclear whether these 25 spaces are in addition to the existing 711 spaces.

Unmet Demand for Encore – Existing Parking Supply

The Proponent has indicated an unmet demand for the Project of approximately 195 spaces. We note that although the Proponent has included a *Parking Demand Summary for Encore* (Table 3-35 on page 3-50), the referenced 2021 Encore Monitoring Report was not included in the FEIR's Appendix. Additionally, we question why only one year of monitoring data was utilized to determine this number, and why data from the 2022 Encore Monitoring Report was not considered. We also encourage the Proponent to consider that demand for parking can be shifted dramatically through the TDM strategies outlined in this letter (especially priced parking) and, most importantly, investments in rapid transit such as the SLX.

Parking Pricing Strategies

In our comment letter concerning the SDEIR, we recommended that the Proponent introduce a substantial parking fee to help achieve the goal of reducing car trips and promoting the use of alternative transportation modes. We recognize that the Proponent cites that it is not industry standard to charge for parking at casinos, to which we respectfully offer that the location of the Project and Encore Boston Casino are within a densely populated metro urban community with access to both rapid and active transportation options, which are not necessarily an industry standard. Furthermore, the casino and accompanying facilities benefit from the fact that the Commonwealth has essentially created a monopoly for gambling in the region, which shields the Proponent at least to a certain degree from competition based on so small a factor as the cost of parking.

Therefore, **we urge the Proponent to approach pricing for parking as a powerful tool to shift demand away from SOV trips and dramatically reduce the mode share of trips made by auto.** Furthermore, we recommended that the Proponent consider using the revenue generated from these fees to support the TDM program, additional transit investments (outlined earlier), and/or to mitigate environmental impacts. We recognize that the Proponent has committed to a parking fee for Block A during special events and for hotel parking for Blocks B and C. However, we want to highlight that the Proponent has not specified the number of parking spaces or how the parking fee revenue would be applied. MAPC encourages the Proponent to reconsider the implementation of a substantial parking fee for all parking needs.

Electric Vehicles

MAPC acknowledges the Proponent's current proposal for electric vehicle parking entails dedicating only 2% of parking spaces for EV charging and 8% to be EV ready for Phase 1-Block A. For the subsequent phases (Blocks B, C, and D), these percentages marginally increase to 5% for EV charging and 20% to be EV ready. **MAPC strongly urges the Secretary to require the Proponent to commit to 25% of parking spaces for EV charging and the remaining 75% of parking spaces to be EV ready for future installation.** This allocation of EV charging and EV readiness aligns with the [City of Boston's Electric Vehicle Readiness Policy](#).

Mode Share Goals

It is imperative for the Proponent to adopt more ambitious mode share goals, especially concerning patrons. According to the SEIR, approximately 92% of patrons currently arrive at the site using their personal vehicles or taxi/ride-hailing services. The FEIR suggests a mere 5% reduction in vehicular trips accessing the site. In other words, the mode share goals for patrons accessing the site remain notably high at 87%, with goals of 45% for personal auto trips and 32% for taxi/ride-hailing services. **The mode share goals for patrons utilizing the Orange Line (8%), MBTA Bus (6%), and Water Shuttle (3%) must be raised, particularly in light of the Silver Line Expansion's expected utilization of Lower Broadway, as well as the construction of the Mystic River Crossing from Assembly Station.** In the face of a dual climate and congestion crisis, it is unconscionable for a development of this magnitude to move forward with the expectation that such a vast majority of trips will be made by vehicle.

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Furthermore, the Proponent should ensure the continuation of a robust monitoring program and commit to specific actions designed to attain these objectives. These actions would encourage patrons to opt for non-automotive modes to access the site. In alignment with this, MAPC supports the Proponent's commitment that if monitoring indicates that the combined alternative mode shares are 10 percent or less than the target (e.g., if the patron combined alternate mode shares is 23% or less), the Proponent will work with MassDOT, the TMA, and other stakeholders, as appropriate, to identify and implement modifications to the Project's TDM program.

Conclusion

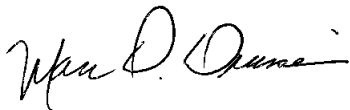
MAPC has a long-term interest in alleviating regional traffic and environmental impacts, consistent with the recommendations of *MetroCommon 2050*, including "*reducing vehicle miles traveled and the need for single-occupant vehicle travel through increased development in transit-oriented areas and walkable centers*,"⁴ and "*improving accessibility and regional connectivity*."⁵

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

MAPC finds that this FEIR does not adequately and properly comply with the Massachusetts Environmental Policy Act. Given the dramatic ways in which the Proposal fails to comply, and the significant impact of a development of such size, we respectfully request that the Secretary require that a Supplemental Final Environmental Impact Report (SFEIR) be prepared to address the deficiencies of the FEIR as identified 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 Planning & Development Agency
Brad Rawson, Somerville
David Mohler, MassDOT
Brian Arrigo, Commissioner, DCR
Joe Delaney, Massachusetts Gaming Commission

⁴ <https://metrocommon.mapc.org/announcements/recommendations/2>

⁵ <https://metrocommon.mapc.org/announcements/recommendations/1>