



SMART GROWTH AND REGIONAL COLLABORATION

January 8, 2024

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 Final Environmental Impact Report, EEA #15060

Dear Secretary Tepper:

The Metropolitan Area Planning Council (MAPC) is grateful for this opportunity to review and provide comments on the Supplemental Final Environmental Impact Report (SFEIR) submitted by Wynn MA, LLC on November 30, 2023. MAPC regularly reviews proposals deemed to have regional impacts, and thus provided comments in response to the Proponent's Final Environmental Impact Report (FEIR) on October 10, 2023. Our focus in reviewing proposed projects is to evaluate them 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, we also review projects to determine if they will advance the Commonwealth's statutory obligation to reduce GHG emissions by at least 50% from 1990 levels by 2030, 75% by 2040, and 85% by 2050, to achieve net zero emissions by 2050.

Additionally, 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*",¹ and "*improving accessibility and regional connectivity*".²

Wynn MA, LLC, the Proponent, has submitted a Supplemental Environmental Impact Report (SFEIR) for additional multi-use commercial development of approximately 1.73 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. The Project also includes public realm improvements such as a pedestrian bridge over Broadway, new sidewalks, street trees, and landscaped plazas.

The Project is proposed to be constructed in multiple phases, which the Proponent has stated in this new submission may not be sequential and may overlap. The first phase, referred to as "Phase 1", will comprise a 999-seat theater, 200-seat comedy club, 18,700-sf gambling area, approximately 50,700 sf of F&B space, a 740,500-sf parking garage, and a 12,500-sf pedestrian bridge over Broadway. The remaining development, or "Future Phases," will include approximately 600,000 sf of hotel space, 20,000 sf of event space, 30,000 sf of F&B facilities, 20,000 sf of retail space, 96,600 sf of parking, and a

¹ <https://metrocommon.mapc.org/announcements/recommendations/2>

² <https://metrocommon.mapc.org/announcements/recommendations/1>

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60,000-sf warehouse. MAPC notes that the square footage of parking constructed in Future Phases has been reduced by 104,700 sf since the previous submission.

While MAPC maintains significant concerns about the impacts of this Project on motor vehicle CO₂ emissions and traffic congestion caused by high volume of vehicle trips generated, we recognize the improvements made by the Proponent since their last application. Specifically, we appreciate that the Proponent has reduced the number of parking spaces by 362 and added 66 additional electric vehicle spaces, thus enabling a significant reduction in the building footprint of the garage, which has been enhanced by installation of a parking guidance system to assist drivers in locating available spaces and to minimize the number of drivers looking for spaces.

Increase Investment in the MBTA Silver Line Extension (SLX) as Project Progresses

We also appreciate that the Proponent has increased their commitment to the MBTA for bus only lanes on Lower Broadway from \$1 million to \$2 million, and strongly encourage them to increase this investment significantly as transformative projects such as the Silver Line Extension (SLX) move forward.

We understand the Proponent's hesitation to invest in a transportation project that has yet to officially commence. However, once the SLX is underway (which we expect to take shape in early 2024), we recommend that the Proponent significantly increase its \$2 million contribution. This would enable the level of service the project delivers and the quality of features it provides - such as station design and facility amenities - to be improved to the level of a truly competitive, world class transit option. We believe such a facility would be consistent with the caliber and image both the Proponent and the City are seeking to convey for the Encore Boston Harbor resort and its environs.

As discussed in our previous letter, the SLX has the potential to introduce true bus rapid transit (BRT) to the Boston region with frequent, reliable service and stations that rival even the best rail systems. **The Proponent has an unmatched opportunity to work with the MBTA as a flagship partner on the SLX, 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 people accessing the facilities, including employees as well as patrons.

The Proponent already acknowledges the potential benefits of improved transit service on Lower Broadway, stating in Section 3.3.3.1 of the FEIR, "*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). We hope that these values will be reflected in added financial contributions to the SLX as the project solidifies in the near future.

Revisit Mode Share Goals to Reflect Increase in Multimodal Access

We recognize that the Proponent believes that any further changes to their heavily auto-centric mode share goals are not currently viable given the Project's location and existing transit services. Fortunately,

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many substantive transit and multimodal transportation projects are slated to take shape over the next one to five years, and as a result, it is imperative that the Proponent revisits these goals over time.

These projects include:

- MBTA Silver Line Extension (SLX)
- MBTA Bus Network Redesign (BNR)
- City of Boston’s Rutherford Avenue Redesign (*now re-launched and featuring center-running bus lanes with potential to connect to the SLX for a “one seat ride” from Everett to Boston*)
- Mystic River Crossing from Assembly Station (MRC)

Each one of these projects will significantly increase both the quality and quantity of non-vehicular transportation options to the site. As these investments move forward and become a reality, the **mode share targets should be adjusted accordingly**, particularly regarding patrons, approximately 92% of whom currently arrive at the site using their personal vehicles or taxi/ride-hailing services, according to the SFEIR. With the arrival of bus rapid transit (via SLX and Rutherford Avenue), high frequency bus service (via BNR), and direct bicycle and pedestrian access to the Orange Line (MRC), the Proponent will have an important opportunity to ramp up their current goal for a 5% reduction in vehicular trips. As such, **it is critical that the Proponent maintain a robust transportation monitoring program (tracking vehicular trips, public transportation, parking, and TDM)**, regularly reporting results to MassDOT and adjusting targets accordingly and in tandem with the existing Encore project.

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 not only Rutherford Avenue, but also Sullivan Square and the Gilmore Street bridge. These investments will provide a runway for the SLX 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 most 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 TDM Program

In the spirit of the Proponent’s commitment to TDM, we urge them to subsidize fully all employees’ MBTA passes, not just for two months and at 70% thereafter. Recent public polling³ has revealed that cost is often a top deciding factor for commuter mode choice, and that making transit free leads to more people choosing to use it. We believe the non-SOV mode share for employees can be significantly increased through a 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. It is worth noting that even a small and less well-endowed organization such as MAPC fully covers the cost of employee transit passes, along with many other larger and smaller agencies and private companies.

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

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Regarding the cost of parking, we recognize and accept the Proponent's understanding that charging for parking at gaming facilities is not an industry standard and would threaten the viability of the business. As stated in our previous comments, the ability of the Lower Mystic TMA, and all TDM efforts to reduce congestion and increase participation in multimodal transportation options is severely diminished by the availability of free parking. **We recommend that as multimodal options increase, and transportation monitoring provides a clearer picture of how the site is being accessed, the Proponent introduce fees for on-site parking, thus serving to reduce vehicle trip generation, congestion, and emissions.**


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 due to rapid transit improvements and the application of an aggressive TDM program. As such, it is essential to highlight that Phase 1 proposes to frontload 96 percent of the 2,278 parking spaces for the site. While the total number of spaces has been reduced, the proportion of spaces constructed in the initial phase of construction has remained the same, making it difficult or impossible to revisit the number of spaces in the future due to shifting demand. **We recommend decreasing the number of spaces proposed for construction in Phase 1 and instead installing these spaces aligned with the development's progress.**

Conclusion

In its newly revised form, this very substantial project is still poised to have damaging impacts on our climate and our environment. However, with the positive and promising outlook of local and regional transit improvement and expansion projects on the horizon, combined with a steadfast commitment to ambitious TDM measures and a stringent monitoring program, we believe many of these impacts can be avoided or mitigated.

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