



Wynn Resort in Everett

Everett, Massachusetts

Supplemental Final Environmental Impact Report VOLUME I

EOEEA #15060

February 17, 2015

submitted to Executive Office of Energy and
Environmental Affairs

submitted by Wynn MA, LLC

prepared by Fort Point Associates, Inc.



in association with Dirigo Group
Wynn Design & Development, LLC
Lifescapes International, Inc.
RD Vanasse & Associates Inc.
GZA GeoEnvironmental, Inc.
Howard/Stein-Hudson Associates, Inc.
Norris & Norris Associates
Novus Environmental
Tech Environmental
Federal Airways & Airspace



Fort Point Associates, Inc.

Urban Planning Environmental Consulting Project Permitting

February 17, 2015

Re: Wynn Resort in Everett
 Supplemental Final Environmental Impact Report
 EEA# 15060

Dear Reviewer:

We are pleased to submit the Supplemental Final Environmental Impact Report (SFEIR) for Wynn Resort in Everett (the "Project") on behalf of Wynn MA, LLC. This document has been prepared to describe the proposed three million square foot hotel/resort and gaming facility to be located at 1 Horizon Way in Everett, Massachusetts.

The SFEIR describes the elements of the project in great detail, including potential environmental impacts and proposed mitigation measures to be provided in response to the Certificate of the Secretary of Energy and Environmental Affairs on the Final Environmental Impact Report, which was issued on August 15, 2014. The SFEIR also describes the benefits that the Project will bring to the City of Everett, the region and the Commonwealth of Massachusetts.

Comments regarding this document should be directed no later than March 27, 2015 to:

Matthew Beaton
Executive Office of Energy and Environmental Affairs
Attn: MEPA Office/ MEPA Reviewer
100 Cambridge Street, Suite 900
Boston, MA 02114

Printed copies of this SFEIR are available at local libraries, and copies may be obtained from Fort Point Associates at the address listed below, or by contacting me at: jkohn@fpa-inc.com.

Sincerely,

Judith T. Kohn, RLA
Senior Project Manager
Fort Point Associates, Inc.

Cc. Jacqui Krum, Wynn MA, LLC
encl. Wynn Everett SFEIR

Wynn Resort in Everett

Everett, Massachusetts

Supplemental Final Environmental Impact Report

EOEEA #15060
February 17, 2015

submitted to
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, Massachusetts 02114

submitted by
Wynn MA, LLC
3131 Las Vegas Boulevard South
Las Vegas, Nevada 89109

REF
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Chapter 1

PROJECT SUMMARY

CHAPTER 1: PROJECT SUMMARY

1.1 PROJECT IDENTIFICATION

Project Name:	Wynn Resort in Everett
Proponent:	Wynn MA, LLC
Address/Location:	One Horizon Way, Everett, Massachusetts

1.2 INTRODUCTION

1.2.1 PROJECT OVERVIEW

The Wynn Resort in Everett (the "Project") is a luxury resort involving an investment of at least 1.6 billion dollars to transform a blighted section of the City of Everett, Massachusetts adjacent to the Mystic River into a world-class destination. The Project will contribute hundreds of millions of dollars, including tens of millions of dollars in infrastructure contributions, to the City of Everett, the region, and the Commonwealth of Massachusetts. The Project will be constructed on the contaminated site of a former chemical manufacturing plant totaling approximately 33.9 acres (the "Project Site"), and will include a luxury hotel with 629 rooms, a gaming area, retail space, food and beverage outlets, convention and meeting space, a spa and gym, a parking garage, and other complementary amenities as described herein. The Project will also include extensive landscape and open space amenities including a public gathering area with an outdoor park-like open space, a pavilion, waterfront features, a public harborwalk, and water transportation docking facilities reconnecting the City of Everett to the Mystic River and Boston Harbor for the first time in generations. The Project will also include off-site improvements including extensive transportation improvements and a multiuse path from the Project's harborwalk to the existing paths at the Massachusetts Department of Conservation and Recreation ("DCR") Gateway Park. The Project will be developed in a single phase as soon as necessary approvals are received.

The Project will anchor and support the Everett Lower Broadway Master Plan (the "LBD Plan") as well as the Everett Central Waterfront Municipal Harbor Plan (the "Everett MHP"), approved by the Secretary of Energy and Environmental Affairs (the "Secretary") on February 10, 2014, by stimulating development of the underutilized Mystic River waterfront including the Project Site.

As demonstrated in the Project's Final Environmental Impact Report filed on June 30, 2014 (the "FEIR") and in this Supplemental Final Environmental Impact Report

(the “SFEIR”), the Project also serves the broader interests of the Commonwealth in revitalizing its Gateway Cities, creating permanent well-paying jobs, increasing waterfront access, cleaning up contaminated Brownfields, creating meaningful urban open spaces, improving transportation networks including for cyclists and pedestrians, improving stormwater runoff, reducing greenhouse gas emissions, and conserving water and energy.

The Project is already the subject of a comprehensive FEIR that is the subject of the Secretary’s Certificate on the Final Environmental Impact Report dated August 15, 2014 (the “Secretary’s Certificate”). Owing to concerns about traffic and transportation impacts caused by the anticipated popularity of the Project, the Secretary’s Certificate required this SFEIR that was limited in scope to (i) traffic and transportation issues, and (ii) a response to the comments received on the FEIR. This SFEIR responds to the scope specified in the Secretary’s Certificate.

Chapter 1 is a summary of the Project including a discussion of refinements to the Project design since the filing of the FEIR and a comprehensive evaluation of the impacts of those refinements different than those evaluated in the FEIR, if any. Chapter 1 also discusses governmental actions, approvals, and consultations undertaken by the Proponent since the FEIR and the outcomes of those consultations.

Chapter 2 is a materially enhanced transportation analysis for the Project in response to the Secretary’s Certificate, and conducted in consultation with the Massachusetts Department of Transportation (“MassDOT”) and the Massachusetts Bay Transportation Authority (“MBTA”), that includes additional data collected since the FEIR, and significant additional analysis of the transportation impacts of the Project and alternative means of mitigating those impacts. This analysis includes new evaluations of all potentially affected roads, new parking evaluations, and new evaluations of public and private transportation options. All of the new data and analysis has been shared with MassDOT and the data and analyses relevant to the City of Boston have been shared with the Boston Transportation Department (“BTD”).

As required by the Secretary’s Certificate, Chapter 3 is a comprehensive description of the Project’s revised mitigation commitments and associated Draft Section 61 Findings.

Chapter 4 contains the response to all comments received on the FEIR as required by the Secretary’s Certificate.

1.2.2 PROJECT DESIGN REFINEMENTS

Since the FEIR, the design of the Project has been refined. Most notably, in response to a request from the Massachusetts Gaming Commission (the “MGC”), the Project’s hotel tower has been redesigned to positive reviews from the MGC and the media. Recent reports in the *Boston Globe* conclude that the Project design as refined is a “big improvement” and “more graceful” than the previous design. In addition, the *Boston Globe* praised the addition of hotel rooms and other refinements that “yield more tax revenues, create more jobs, and aid a region with a notable shortage of hotel rooms.” At the Massachusetts Gaming Commission January 22nd open meeting, Stephen Crosby, the Chairman, remarked that the new building design “looks great.”

The height of the tower remains unchanged since the FEIR but the new design includes a wider, curved, glass 25-story shaft that varies from a height of 386 feet down to 343.5 feet across the façade from west to east. See Figure 1-21, Overall South Elevation. The tower remains in the same location and orientation on the podium relative to the lower profile components of the building and the overall footprint of the building remains unchanged. There have also been refinements to the design and uses of the interior spaces of the tower and the design and uses of the single story portion of the building. Figures 1-5 through 1-24 are illustrations of the refined Project design.

Other Project design refinements since the FEIR include a 300 space reduction in the number of parking spaces in the parking garage, the addition of 125 hotel rooms, elimination of the previously proposed nightclub, a slight increase in gaming positions, an increase in the square footage of the convention and meeting space, and a modest reduction in the square footage of retail and food and beverage space. Table 1-1, Comparison of Project Elements as Described in FEIR and Elements of Refined Project Design, compares the elements of the Project as described and evaluated in the FEIR with the refined Project design elements evaluated in this SFEIR.

Table 1-1: Comparison of Project Elements as Described in FEIR and Elements of Refined Project Design

Element	As described in FEIR (square feet unless otherwise noted)	As refined and evaluated in SFEIR (square feet unless otherwise noted)	Change: number	Change: square feet
Hotel Rooms	504 keys	629 keys	125	
Hotel Tower	543,677	621,774		78,097
Gaming	192,543	190,461		(2,082)
Total Gaming Positions	4,160	4,580	420	
Retail (includes hotel and gaming areas)	77,250	52,632		(24,618)
Food/Beverage	64,593	54,680		(9,913)
Convention/Meeting	32,942	37,068		4,126
Spa/Gym	13,130	15,405		2,275
Entertainment/Nightclub	30,392	0		(30,392)
Back-of-House (includes MEP)	383,725	411,058		27,333
Front-of-House Support (includes restrooms, lobbies, etc.)	75,473	58,548		(16,925)
Total Parking Spaces	4,500 spaces	4,200 spaces	(300)	
Parking Spaces on-site	3,700 spaces	3,400 spaces	(300)	
Parking Spaces off-site	800 spaces	800 spaces		
Parking Garage	1,624,970	1,627,751		2,781
Total On-Site Gross Floor Area	3,038,695	3,096,700		58,005

Due to a Project design refinement raising the floor elevation on the western wing of the Project (the “west wing”) to 18’-4” NAVD88 (six feet higher than as described in the FEIR) to provide a consistent floor elevation across the entire first floor, transitions to the outdoor open space areas will be made via slopes, stairs, and accessible ramps. Waterfront features continue to include a 20-foot wide harborwalk with a connection to DCR’s Gateway Park; restored coastal bank and salt marsh, a public gathering area, a pavilion, waterfront features, and water

transportation and transient vessel docking facilities. See Figures 1-5, Proposed Conceptual Site Plan, and 1-6, First Level Floor Plan.

1.2.3 SITE VEHICULAR ACCESS

Primary vehicular access to the Project Site will be at a new signalized intersection on Broadway (Route 99). Patrons who drive to the Project Site will access the Project driveway and proceed to the on-site parking garage. The primary Project driveway will be a four-lane boulevard (two lanes in each direction) with a landscaped island, marquee sign, period lighting, sidewalks, and bicycle accommodations. The conceptual design of the primary Project driveway is shown on Figure 1-24A. Implementing the conceptual design for the primary Project driveway will require the acquisition of property owned by a third party. The Proponent has entered into an Option Agreement to purchase that property and plans to exercise the option and close on the property in the next 60-90 days.

A service driveway for employee shuttle buses, delivery vehicles, service vehicles, and emergency vehicles will be located further north on Broadway (Route 99) at the existing signalized intersection of Beacham Street and Broadway (Route 99). The conceptual design of the service driveway is shown on Figure 1-24B. Implementing the conceptual design for the service driveway will require the acquisition of three properties owned by third parties. The Proponent has entered into an option agreement and has exercised its option to acquire one of those properties. The transfer of that property is anticipated to occur in February 2015. With respect to the second property, on August 26, 2014, the Proponent submitted an offer to acquire certain property of the MBTA in Everett, MA with a deposit of One Million Five Hundred Thousand Dollars (\$1,500,000). On September 3, 2014, consistent with its enabling statute, Massachusetts General Laws Chapter 161A, the MBTA issued a "Notice of Proposal and Request for Response" (the "RFR") with respect to the sale of this property seeking to achieve the best value for the MBTA through an open, competitive process. The deadline for responding to the RFR was October 3, 2014. The Proponent was the only bidder. Following the closing of the RFR, the Proponent has met with the MBTA to facilitate the closing of this property. Per the terms of the RFR, the closing on the property will take place on a date within one hundred eighty (180) days of the designation of a successful bidder. The MBTA designated Wynn as the successful bidder by letter dated January 29, 2015 and the transfer of such property is anticipated to occur in February 2015. Either the Proponent or the Everett Redevelopment Authority will acquire the third property.

The service driveway will be signed for authorized vehicles only. When necessary, the service driveway will be used to hold taxicabs waiting to pick up Project patrons at the main entrance thereby preventing taxicab queues on Broadway (Route 99).

Such taxicabs will travel along the service driveway and connect internally to the primary driveway.

The service driveway will also provide access from Broadway (Route 99) to the Everett Shops facility of the MBTA. However, access to the service driveway beyond the Everett Shops will be restricted to emergency, service, and delivery vehicles traveling to the Project. Appendix B-11 to this SFEIR contains detailed analyses of the proposed Everett Shops facility access developed in collaboration with the MBTA.

Employees who drive will park off-site at one of three employee parking lots and ride an employee shuttle bus to the Project Site. No employee parking will be provided on-site except for a limited number of spaces for executives and disabled employees.

The Project will also initiate and provide scheduled water transportation ferry service between the Downtown Boston waterfront, the South Boston Seaport, and the Project Site. The Proponent will design and construct a water taxi/shuttle dock that will be available as a new stop for water transportation routes. The Project proposes a water shuttle service with stops in Downtown Boston (Long Wharf or Rowe's Wharf) and South Boston (World Trade Center), with the potential for expansion to other Boston Inner Harbor locations. The Proponent will build custom boats for the service to ensure that they can pass under the Alford Street Bridge without requiring it to open.

1.2.4 OPEN SPACE

The Project includes extensive open spaces on a site currently unavailable to the public. The Project's open space will include lively pathways and plazas lushly landscaped with flowers and year-round plantings. The open spaces will include a pavilion, park benches, and other public amenities. The public will be encouraged to visit the Project Site to experience the ecological restoration of the Project's living shoreline, to take water transportation from the Project's new floating docks to harborfront locations in Boston, and to enjoy the vibrant outdoor programming the Proponent will provide on the Project Site.

The Project's new 20-foot wide continuous harborwalk will connect the residents of Everett and its neighboring communities to the Project and beyond. The harborwalk will be fully handicapped accessible and enhanced by high-quality pedestrian amenities along its length, including public seating, appropriate signage, pedestrian level lighting, safety railings where required, and lush plantings. The Project's restrooms will be available to the public. The Project's waterfront zone will be sheltered from the prevailing west and northwest winds during the colder months but open to the cooling sea breezes during the warmer months.

The Proponent intends to connect the harborwalk with the nearby DCR Gateway Park with a connector path over adjacent land owned by others that will also be fully handicapped accessible, with the same high quality pedestrian amenities as the harborwalk.

The Project's active open space will be a welcome and long awaited improvement on the barren, contaminated, and currently completely inaccessible Project Site that has scarred Everett for generations. In short, the Project will greatly enhance waterfront access to and along the Everett waterfront, and the waterfront of neighboring communities, in furtherance of the Everett MHP.

1.2.5 REMEDIATION

As described in the FEIR in sections already determined by the Secretary to adequately and properly comply with MEPA and its implementing regulations, soil, groundwater, and sediment at and from the Project Site were contaminated by prior activities on the Project Site including chemical manufacturing. This contamination has, for decades, impeded the use of the Project Site and adversely affected the community and the Mystic River. The Proponent will address the longstanding threats to human health and the environment posed by this contamination in compliance with applicable federal and state laws and regulations, including the Massachusetts Contingency Plan ("MCP"), and in continued consultation with the Massachusetts Department of Environmental Protection ("MassDEP"). On January 2, 2015, the Proponent acquired the Project Site, and on February 5, 2015, submitted to MassDEP an Eligible Person Submittal and Tier II Classification Submittal assuming responsibility for the further design and implementation of the remediation of the MCP Disposal Site that includes the Project Site.¹ As indicated in that submittal, the Proponent's Licensed Site Professional ("LSP") has developed, in consultation with MassDEP, a plan to complete the remediation of the contamination at and from the Project Site as soon as all necessary approvals are received from the regulators responsible for those approvals. The total estimated cost of that remediation is \$22 million to \$31 million plus an additional \$15 million for the management and disposal of soil excavated in the course of the construction of the Project garage. The remediation plan and the approvals necessary to implement it are further discussed in Sections 1.2.5.1 and 1.2.5.2 below.

1.2.5.1 LANDSIDE REMEDIATION PLAN

The remediation of the Project Site necessary to make it safe for all of its proposed uses, including the recreational use of the open space described in Section 1.2.4 above, will be completed prior to the opening

¹ The MCP defines a Disposal Site as any "place or area...where oil and/or hazardous material has come to be located." The boundaries of a Disposal Site are not limited by property boundaries.

of the Project and has four elements: (a) In-Situ Solidification/Stabilization of contaminated soil in the southern portion of the Project Site; (b) excavation of contaminated soil in the northern portion of the Project Site and in the area of the Project Site in which the living shoreline coastal bank and salt water marsh are to be restored, and in and adjacent to the area in which the new bulkhead is to be reconstructed; (c) substantial additional excavation of contaminated soil in the footprint of the garage to be constructed on the Project Site; and (d) the placement of clean fill over any areas of the Project Site not covered by Project buildings or pavement. See Figure 1-28, Proposed Remediation, and Figure 1-30, Post-Construction Surface Conditions. The characterization of contamination on the Project Site has continued since the FEIR. As a result, the Proponent's LSP will submit to MassDEP a Release Abatement Measure Plan ("RAM Plan") respecting the In-Situ Solidification/Stabilization of contaminated soil in the southern portion of the Project Site; and the excavation of contaminated soil in the northern portion of the Project Site. The Proponent anticipates submitting the initial RAM Plan in February, 2015 and implementing the components of the initial RAM Plan in the spring of 2015. The remediation set forth in the initial RAM Plan is estimated to be completed within approximately six months of the start date.

The excavation of contaminated soil in the area of the Project Site in which the living shoreline coastal bank and salt water marsh are to be restored, the area in which the new bulkhead is to be reconstructed, and in the footprint of the garage to be constructed on the Project Site will also be the subject of a RAM Plan to be submitted to MassDEP in the spring of 2015.

The elements of the remediation plan that are the subject of the second RAM Plan require approvals, including a Chapter 91 license from MassDEP, that are not required for the elements that are the subject of the initial RAM Plan. MassDEP cannot provide these approvals until the MEPA review of the Project is completed. For that reason, the commencement date of the remediation set forth in the second RAM Plan is less predictable. However, all of the elements of the landside remediation plan will be completed in the course of the construction of the Project and before the Project opens.

The total estimated cost of the landside remediation is \$27 million to \$32 million including the approximately \$15 million for the management and disposal of contaminated soil excavated in the course of the construction of the parking garage.

1.2.5.2 WATERSIDE REMEDIATION PLAN

As is also discussed in the FEIR, Mystic River sediment in the water side area of the Project Site is also contaminated and that contamination is believed to extend beyond the limits of the Project Site. As discussed in the first paragraph of Section 1.2.5, the Proponent will address contamination from the Project Site throughout the Disposal Site. This Section 1.2.5.2 describes the Proponent's comprehensive plan, developed in consultation with MassDEP, to respond to the water side contamination.

In July and August 2013, additional sediment sampling and analysis was completed in the water side area of the Project Site. This additional sediment sampling and analysis was sufficient to characterize conditions in the water side area of the Project Site.

The Proponent will complete the sediment sampling and analysis necessary to determine the extent of the Disposal Site. On February 4, 2015, in response to the Proponent's Request for a Determination of Applicability ("RDA"), the Boston Conservation Commission issued a Negative Determination which clears the way for sediment sampling, pursuant to a plan that was the subject of prior collaboration with the MassDEP.

The Proponent will use the results of the water side assessments already completed in Everett, and the water side assessments to be completed in Boston, to prepare a supplemental Phase II Comprehensive Site Assessment and Phase III Remedial Action Plan respecting water side contamination at and from the Project Site. The Phase III Remedial Action Plan will evaluate the feasibility of achieving a Permanent Solution for the water side contamination at and from the Project Site.

The depth to which sediment will be removed on the Project Site will be affected by the details of the living shoreline coastal bank and salt marsh restoration and the reestablishment of the prior navigational channel that, with the development of the dock system, are part of the Project. The volume of sediment estimated to be removed in connection with these improvements on the Project Site is estimated at approximately 15,000 cubic yards.

The extent of additional sediment removal to comprehensively address contamination at and from the Project Site will be determined in the Phase II Comprehensive Site Assessment, the Phase III Remedial Action Plan, and the Phase IV Remedy Implementation Plan to be submitted

under the MCP in consultation with MassDEP. The currently estimated maximum volume of additional removal to comprehensively address this contamination is approximately 60,000 cubic yards.

Sediment removal on the Project Site, and the permitting of that removal, will be as presented in the FEIR.

Sediment removal outside the Project Site for the purpose of achieving a Permanent Solution under the MCP will also be designed in accordance with applicable state and federal wetlands and water quality requirements.

The Proponent anticipates that the sediment removal from the Disposal Site can be completed in one season, and will be conducted only during those times of the year permitted by State and Federal agencies so as to reduce possible adverse impacts to the ecosystem.

1.2.6 OTHER MITIGATION AND ENHANCEMENTS

1.2.6.1 TRANSPORTATION

The transformational transportation improvements to be undertaken with respect to the Project are described in greater detail in Chapters 2 and 3. They include \$65.5 to \$85.5 million in capital roadway improvements plus an additional approximately \$13 million in operating costs for the benefit of Project patrons as well as other travelers using Lower Broadway (Route 99) in the City of Everett, Santilli Circle in the City of Everett, Sweetser Circle in the City of Everett, Wellington Circle in the City of Medford, and Sullivan Square in the City of Boston, among others.

1.2.6.2 SHORELINE AND SHELLFISH RESTORATION

The Project continues to include substantial measures to enhance and restore the degraded coastal bank and recreate a salt marsh on the Project Site. In response to the concerns of the Massachusetts Division of Marine Fisheries, the 30,000 square foot clam and oyster seeding activities previously proposed by the Proponent have been eliminated from the Project. The Project will contribute to improvements to water quality in the Mystic River through the remediation discussed in Section 1.2.5 above as well as the implementation of stormwater Best Management Practices and other mitigation measures. The Proponent will continue to work with the Mystic River Watershed Association and

other interested parties to advance the restoration of aquatic resources in the immediate vicinity of the Project Site.

1.2.6.3 PUBLIC BOAT DOCK

The Project will include boat access to the first public boat dock in the City of Everett. The public boat dock will provide opportunities for boaters, along with the new water shuttle service, to travel by water to the Project Site. A handicapped accessible ramp to the dock will be compliant with the Americans with Disabilities Act.

1.2.7 POTENTIAL IMPACTS OF PROJECT DESIGN REFINEMENTS

This Section 1.2.7 evaluates the impacts, if any, of the Project design refinements discussed in Section 1.2.2, other than the transportation and transit impacts which are comprehensively identified and evaluated in Chapter 2 as required by the Secretary's Certificate. As is discussed in further detail below, no additional permits or approvals are required as a result of these Project design refinements and the impacts of the Project design refinements are either non-existent or insubstantial.

1.2.7.1 GREENHOUSE GAS EMISSIONS

A new Greenhouse Gas (GHG) analysis for the Project as refined, and as requested in the Secretary's Certificate, models energy use relative to the more stringent 2010 ASHRAE 90.1 standards and the existing Massachusetts Building Code IECC 2012 base. That analysis is presented in the Greenhouse Gas and Mesoscale Air Quality Analysis, included in Appendix C.

That analysis demonstrates that the Project's energy-saving measures will achieve substantial emissions reductions that are equivalent to or better than the Project design evaluated in the FEIR. Building energy use will be 18.3% below the IECC 2012 base, well beyond what may be required by the hypothetical revised Stretch Code expected, as indicated in the Secretary's Certificate, to require energy reductions of 12 to 15 percent below the IECC 2012 base.

The entire Project's energy use (including building, garage ventilation, garage lighting and water/wastewater utility energy uses) will be 26.4% below the updated ASHRAE 90.1-2010 standards. These Project energy reductions will exceed the energy reductions modeled in the FEIR (which were 29.1% but relative to the less stringent 2007 baseline consistent with applicable MEPA scoping requirements, not the more stringent 2010 ASHRAE 90.1 standards).

1.2.7.2 WETLANDS AND WATERWAYS: CHAPTER 91 TIDELANDS

The Project design, as refined, will continue to comply with the maximum applicable MHP height limits of 400 feet and 55 feet respectively. The Project continues to provide approximately 6.26 acres of open space within jurisdiction. This figure is approximately 24% of the entire land area of the Project Site and approximately 59% of the land within jurisdiction of Chapter 91. As stated in the FEIR “[t]he Project will provide substantial public benefits and water-dependent uses along the Project Site’s waterfront. It will substantially transform the vacant waterfront industrial site into a vibrant and active development...”

The Project design, as refined, continues to maintain Facilities of Public Accommodation (“FPA”) on the ground floor although the types and locations of those FPAs have been adjusted. Convention and meeting space has been relocated to the first level’s west wing, and a grand ballroom replaces the nightclub space that has been eliminated. See Figure 1-6, First Level Floor Plan. The meeting rooms and grand ballroom will provide extensive opportunities for use by the transient public through year-round public-focused exhibits, programming and events.

The floor elevation of the west wing is proposed to be increased from elevation 12’-4” to elevation 18’-4” NAVD88, consistent with that of the rest of the building’s first level. This change is in further response to concerns regarding sea level rise and improves accessibility within the building by maintaining consistent floor levels. The open space, harborwalk, and boat docking facilities will remain completely accessible from both off-site locations and the facility’s first level.

Height and Shadow: The Project continues to include a 386-foot hotel tower, approximately one third of which is located within Chapter 91 tidelands jurisdiction and would exceed the baseline regulatory height standards established in Chapter 91. This area (shown in red on Figure 1-25, Chapter 91 Allowable Building Height) is consistent with the Everett MHP. The Project’s low-rise west wing within tidelands jurisdiction is lower than the Chapter 91 regulatory height standard, and is also compliant with the Everett MHP.

An updated shadow study of the Project design as refined was completed consistent with the analysis contained in the FEIR. October 23rd was selected as the date on which shadows would be studied because it is during a time of the year when many people still participate

in active waterfront use and when shadows are longer and may extend to areas within Chapter 91 jurisdiction. October 23rd was also selected because the Secretary's Decision on the Everett MHP identifies this date as the most appropriate date to be used for the purpose of Waterways licensing. The updated shadow study compared the Chapter 91 jurisdictional shadow impacts of the Project design as refined to a Chapter 91 compliant project during three times (9 a.m., Noon, and 3 p.m.) on October 23rd. See Figure 1-26, Shadow Study for Proposed and Chapter 91 Compliant Projects. The updated shadow study confirms that the Project design as refined results in no net increase in shadow within Chapter 91 jurisdictional areas both on and off the Project Site. Accordingly, consistent with the conclusion of the shadow study presented in the FEIR, it is not expected that any offset for additional height will be required for the Project.

Wind Effects: An updated pedestrian level wind study of the Project design as refined was completed in the same manner as the wind study presented in the FEIR using computational fluid dynamics (CFD) modeling techniques. The updated wind study is Appendix F, Pedestrian Wind Assessment. The conclusion of the updated wind study is that the Project design as refined will not adversely affect pedestrian comfort levels in the waterfront areas of the Project Site.

The wind study found that the Project design, as refined, works well to redirect a majority of the prevailing winter winds from the west-northwest and northwest along the casino roof, with some wind directed above and through the entry portico. As shown in Figure 1-27, Predicted Wind Comfort Zones – Summer and Winter, summer wind comfort was predicted as leisurely walking while winter wind comfort was rated as leisurely walking and fast walking. Wind comfort around the entry portico was rated suitable for sitting and standing throughout the year. In the overall entry area, the predicted wind comfort conditions were satisfactory. The CFD wind analysis indicated that the wind safety criterion was met around the Project.

Based on the updated wind study, the predicted wind comfort conditions for the Project design as refined continue to be satisfactory for planned pedestrian and waterfront public open space uses.

1.2.7.3 WETLANDS AND WATERWAYS: WETLAND RESOURCE AREA IMPACTS

Through the process of applying for and receiving an Order of Conditions for the landside remediation described in Section 1.2.5.1, the delineation of Coastal Bank was adjusted in some locations to reflect on-site and topographic observations and review by MassDEP and the Everett Conservation Commission. The total increase in temporary impacts to Coastal Bank resulting from the refined delineation is less than 400 square feet.

1.2.7.4 AERONAUTICAL IMPACTS

The aeronautical impacts of the Project design as refined were also evaluated and that evaluation is included in Appendix E, Aeronautical Impact Statement. The evaluation concluded that any difference between the aeronautical impacts of the prior design and the Project design as refined is negligible. When revising the Aeronautical Impact Statement (AIS), several items were added or changed due to the refinement of the shape of the Project tower. A new radar analysis was added for Terminal Doppler Weather Radar (TDWR). The analysis showed that the Project design as refined raises no concern about the operation of TDWR. Although the change from flat to curved surfaces on the building changed the Airport Surveillance Radar reflection area and shielding coverage, the analysis of that changed reflection area and shielding coverage did not identify any new impacts. In fact, the updated study showed that reflection is less of an issue now than before.

1.2.7.5 WATER USE AND WASTEWATER GENERATION

The Project design as refined, and principally the addition of 125 hotel rooms, will result in an increase in water use and wastewater generation. The estimated sewer discharge associated with the Project design as refined is 283,489 gallons per day and the estimated water use is 311,838 gallons per day. These revised estimates were calculated in the same manner as the estimates presented in the FEIR, in accordance with the state regulations found at 314 CMR 7.00 and 314 CMR 15.00, and by comparison to similar facilities. The design flows referenced in these regulations are outdated and do not sufficiently account for anticipated reductions in water usage based on current building and plumbing codes and the Project's commitment to achieve a LEED Gold certification. However, as confirmed by the City of Everett, the Project's

water consumption and sewer use will be easily accommodated by the infrastructure serving the Project Site.

The Project will continue to incorporate water conservation measures consistent with LEED Gold certification and will also provide funding to the City of Everett to undertake infiltration/inflow (I/I) removal on a 4:1 basis consistent with MassDEP and Massachusetts Water Resources Authority ("MWRA") policy. MassDEP has committed to provide funding for the City of Everett to evaluate suitable I/I projects that could be implemented with Project I/I mitigation funds.

1.3 OTHER BENEFITS TO THE COMMONWEALTH, HOST COMMUNITY, AND SURROUNDING COMMUNITIES

Since the filing of the FEIR, the Proponent received a Category 1 gaming license for Region A (the "Gaming License"). Pursuant to the terms of the Gaming License, the Proponent has agreed to make certain payments to the City of Boston to mitigate any adverse impacts related to the Project. Following the issuance of the Gaming License, the Proponent initiated payments to certain surrounding communities as set forth in the Proponent's agreements with its surrounding communities.

The Project will result in significant public benefits associated with (i) capital investments designed to improve transportation infrastructure, (ii) economic benefits from recurring revenues, (iii) host and surrounding community payments, (iv) direct and indirect employment opportunities, and (vi) environmental benefits.

Among the economic benefits from the Project will be the gaming tax revenues generated for the Commonwealth. These revenues include over \$200 million annually to be allocated for high priority needs of the Commonwealth and of cities and towns. These funds will be used for local aid, community mitigation, tourism, debt reduction, transportation infrastructure, and public health among other uses. See Table 1-2: Distribution of Wynn Everett Casino Tax Revenue, First Full Year.

The transportation infrastructure improvements proposed as mitigation for the Project will benefit all users, not just Project patrons and employees. These improvements will provide lasting improvements to the area's highway network. Capital expenditures in support of environmental improvements total \$92 million, plus an estimated \$22 to \$33 million in remediation expense. These public benefits are further described in Chapter 2, Transportation and in Chapter 3, Mitigation Measures and Draft Section 61 Findings.

Host community payments include a \$30 million initial payment for capital projects and ongoing annual payments of \$25.25 million, increasing by two and one-half percent per

year. Surrounding community payments include upfront payments of approximately \$2 million and annual recurring payments of \$3.4 million per year.

In addition, pursuant to the terms of the Gaming License the Proponent agreed to an initial payment to the City of Boston of \$1 million, and annual recurring payments of \$1.6 million with additional amounts (totaling \$25 million) for the Sullivan Square Infrastructure Project (as defined in the Gaming License).

Additionally, the Project will provide approximately 4,000 construction jobs and approximately 4,000 permanent operations jobs, the latter of which will encompass job categories such as hotel/resort personnel, facility employees, food and beverage employees, gaming, and management and will include full job training, benefits and opportunities for career advancement.

Table 1-2: Distribution of Wynn Everett Casino Tax Revenue, First Full Year

FUND PROGRAM	Percent Dedicated	Dollar Value Millions
MA Cultural Council	2.0	4.02M
MA Tourism Fund	1.0	2.01M
Community Mitigation Fund	6.5	13.07M
Local Capital Projects Fund	4.5	9.05M
Gaming Local Aid Fund	20.0	40.20M
Commonwealth Stabilization Fund	10.0	20.10M
Education Fund	14.0	28.14M
Gaming Economic Fund	9.5	19.10M
Debt Reduction Program	10	20.10M
Transportation Infrastructure & Development Fund	15.0	30.15M
Public Health Trust Fund	5.0	10.05M
Race Horse Development Fund	2.5	5.03M
TOTAL	100%	\$201.01M

1.4 PROJECT GOVERNMENTAL ACTIONS AND APPROVALS

The Proponent has continued to consult with the Massachusetts Executive Office of Energy and Environmental Affairs (“EOEEA”), MassDOT, MBTA, DCR, MassDEP, MWRA, BTS, Massachusetts Port Authority (“Massport”), non-government organizations, and representatives of the Proponent’s host, surrounding, and neighboring communities.

1.4.1 MASSACHUSETTS GAMING COMMISSION

The Proponent intends to complete the MEPA process in March 2015 and then immediately proceed with permitting and the initiation of transportation mitigation.

Construction activities are intended to commence thereafter (anticipated start of construction is first quarter of 2015) with an opening to the public anticipated in late 2017.

On September 17, 2014, following six days of public hearings conducted by the MGC, the Proponent entered into an agreement with the MGC to receive the Gaming License. The Agreement to Award the Category 1 License in Region A to Wynn MA, LLC is included in Appendix D to this SFEIR.

The Gaming License became effective on November 7, 2014 and the Proponent paid the \$85 million license fee to the MGC.

1.4.2 MBTA LAND DISPOSITION

Since the filing of the FEIR, the Proponent has worked, in consultation with MassDOT and the MBTA, on plans for the relocation of the Everett Shops maintenance facility entrance and the construction of a new entrance to the Everett Shops and an access road to be shared by the Proponent and the MBTA as described in Section 1.2.3 above. The MBTA designated Wynn as the successful bidder on January 29, 2015 and the transfer of such property is anticipated to occur in February 2015.

1.5 SUMMARY OF POST-FEIR CONSULTATIONS

1.5.1 MASSACHUSETTS DEPARTMENT OF TRANSPORTATION (MASSDOT)

Based on the Secretary's Certificate, and MassDOT's and DCR's comments on the FEIR, the Proponent prepared and confirmed with MassDOT a list of 59 topics on which further consultation and coordination was required prior to the submittal of the SFEIR. Over the past five months the Proponent and MassDOT and the MBTA have met on ten occasions (August 28th, September 5th, September 29th, October 6th, October 17th, October 21st, December 5th, December 22nd, January 26th, January 29th) in an attempt to address those 59 topics to MassDOT's and the MBTA's satisfaction. Table 1-3: Massachusetts Department of Transportation Coordination Summary identifies each of the 59 topics and their current status. In all but one instance, MassDOT and the Proponent were able to address MassDOT's and DCR's concerns.

Table 1-3: Massachusetts Department of Transportation Coordination Summary

Number	Task Description	Source	Outcome of Project/MassDOT Consultations
	Trip Generation		
1	Clarify "double counting" multi-modal trips	MassDOT letter	Completed
	Methodology		
2	Clarify modeling operational analysis and queue reporting	Cert. scope/ MassDOT letter	Completed
	Route 99 (Broadway/Alford Street), Everett/Boston		
3	Revised analysis with summary table showing 50th and 95th % queues along with available queue storage	MassDOT letter	Completed
4	Explore mitigation options to improve LOS (likely resolved by queuing clarifications)	MassDOT letter	Completed
	Rutherford Avenue Corridor, Boston		
5	Document the relationship between Proponent's proposed mitigation and future planned condition on Rutherford Avenue	MassDOT letter	Completed
6	Consult with MassDOT and Boston on the treatment of Rutherford Avenue and Sullivan Square in the SFEIR. Identify whether interim improvements for the Wynn Everett project would affect feasibility or cost of proposed long-term design of Sullivan Square.	Cert. scope	Completed
	Sullivan Square and I-93 Northbound Off-ramp/Cambridge St Intersection		
7	Modify mitigation design plans per discussions to address concerns about traffic safety, provide detailed plans	MassDOT letter	Items #7 – 12 under review
8	Update queuing analysis using approved methodology (see task 2)	MassDOT letter	
9	Modify analysis to reflect changes to design plans	MassDOT letter	
10	Update VISSIM to reflect changes to design plans	MassDOT letter	
11	Evaluate two-way access on Beacham Street between Sullivan Square station and the Charlestown Garage	MassDOT letter	
	Santilli Circle, Everett		
12	Additional detailed plans to confirm engineering feasibility, including the transition from the Woods Memorial Bridge.	Cert. scope/ MassDOT letter	
13	Road Safety Audit to be completed. Need clarification from MassDOT	tracking - mtgs week of 8/11	Completed

Number	Task Description	Source	Outcome of Project/MassDOT Consultations
	about whether this could be done post license award/SFEIR filing.		
14	Provide updated 50th and 95th % queues	DCR letter	Completed
15	Provide details of timing adjustments	DCR letter	Completed
	Sweetser Circle, Everett		
16	Clarify differences in queue outputs between SIDRA and VISSIM	MassDOT letter	Completed
17	Analyze the short weaving section between the Route 16 WB off ramp and the Route 99 Connector	tracking - mtgs week of 8/11	Completed
18	Address/demonstrate whether improvements at Santilli Circle would benefit Sweetser Circle	MassDOT letter	Completed
19	Commit to maintain ped crossing signal at Route 16 EB on-ramp/rotary	DCR letter	Completed
	Wellington Circle, Medford		
20	SFEIR should reflect commitment to contribute to study and implementation of a long-term solution. Clarify that Wynn has not committed implementation.	MassDOT letter	Wynn to contribute \$1.5M to MassDOT for study
21	Quantify and evaluate whether there would be any loss of green space/trees if the interim improvements are implemented. If there are impacts, provide details on how to mitigate loss of green space/trees.	DCR letter	Completed
22	Commit to replace traffic signal control equipment at President's Landing/Fellsway (Route 28)	DCR letter	Completed
23	Provide details of timing adjustments	DCR letter	Completed
	Revere Beach Parkway (Route 16), Chelsea		
24	Washington Avenue- provide 50th and 95th % queues	DCR letter	Completed
25	Washington Avenue- provide details of timing adjustments	DCR letter	Completed
26	Garfield/Webster Avenues - provide details of timing adjustments	DCR letter	Completed
27	Garfield/Webster Avenues - consider NB/SB split phasing	DCR letter	Completed
	Shuttle Bus Service		
28	Show how service will align with Orange Line schedules and frequency of shuttle service	Cert. scope/ MassDOT letter	Completed
29	Analyze capacity of shuttle system to accommodate both employees and patrons	MassDOT letter	Completed

Number	Task Description	Source	Outcome of Project/MassDOT Consultations
30	Document how the shuttle service would interact with existing MBTA buses at Wellington and Malden Center curbside (see also 31 and 32)	MassDOT letter	Completed
31	Document whether shuttle service would duplicate existing services at Wellington and Malden Center (see also 29 and 32)	MassDOT letter	Completed
32	Provide analysis of employees' use of MBTA bus routes from Sullivan Square Station (bus ridership). Do existing bus routes need to be enhanced?	MassDOT letter	Completed
	Transit Demand and Impacts to the Transit Network		
33	Provide revised analysis of Orange Line peak loads for weekday and weekend service between Wellington and Back Bay	MassDOT letter	Unresolved
34	Provide detailed shuttle berthing plans at Wellington and Malden Center stations (see also 30, 35, and 36)	MassDOT letter	
35	Provide analysis of curbside operations at berthing locations to indicate potential impacts on MBTA curbside bus operations (see also 30 and 34)	MassDOT letter	Completed
36	Demonstrate accessible path of travel from Orange Line to shuttle berth, preferably with graphics	MassDOT letter	Completed
37	Show graphically the location of bus stops on Broadway (Route 99) and the accessible paths of travel from them to the resort.	MassDOT letter	Completed
38	Assess what impacts additional traffic will have on MBTA bus travel times (buses from Sullivan Square station, Charlestown Garage, and Wellington station)	MassDOT letter	Completed
39	Review bus capacity issues with MassDOT. Consider other alternatives such as adjusting times of Wynn shuttles from other stations and making shuttles more attractive to increase utilization. (see also 29, 31, 32)	tracking - mtgs week of 8/11	Completed
40	Consider BRT features in the Route 99 corridor (signal priority, queue jumps, dedicated bus lanes, etc.)	Cert. Scope/ MAPC letter	Completed
41	Present in tabular format which	MassDOT letter	Completed

Number	Task Description	Source	Outcome of Project/MassDOT Consultations
	intersections are utilized by MBTA buses		
	Facility Impacts to MBTA Everett Shops		
42	Lay out the change in access to the Everett Shops in sufficient detail to determine effect on operations	MassDOT letter	Completed
43	Describe how MBTA buses and delivery trucks will access the Everett Shops via the proposed relocated entrance. Particular concern about loading docks and entrances to the buildings	MassDOT letter	Completed
44	Examine turning movements for all vehicle types to determine whether there is any loss of functionality	MassDOT letter	Completed
	Pedestrian Access		
45	Show pedestrian improvements to intersections within walking distance of the site - along walking route to Sullivan Square Station	MassDOT letter	Completed
46	Discuss viability of pedestrian connection across Mystic River to Assembly Square station	MassDOT letter	Completed. Wynn to contribute up to \$250,000 to DCR for study
47	Consult with DCR, Everett, and Somerville on pedestrian connection over the river (see 46)	Cert. scope/ MassDOT letter	Completed
	Bicycle Access		
48	Analyze Sweetser Circle bicycle accommodations. Verify City of Everett's plans and commitment to rail trail connection (Northern Strand Community Path extension).	MassDOT letter	MassDOT to review final agreed upon plans
	Parking		
49	Commit to monitor the effectiveness of pricing strategies and adjust as needed	MassDOT letter	Completed
50	Reevaluate parking demand and clarify assumptions used to determine overall on-site parking supply, including source of operation capacity percentages, assumption of patron length of stay and arrival patterns, and requirement to achieve a desired LOS for patrons.	Cert. scope	Completed
51	Address whether parking could be banked until warranted by demand	Cert. scope	Completed
	Traffic Monitoring		
52	Include additional locations and	MassDOT letter	Completed

Number	Task Description	Source	Outcome of Project/MassDOT Consultations
	MBTA bus routes		
53	Consider additional TDM measures suggested by MAPC and MassDEP	Cert. scope	Completed
	Mitigation and Section 61 Findings		
54	Revise and update mitigation, including clear commitments to implement, estimated costs, parties responsible for implementation, and schedule for implementation	Cert. scope	Completed
55	Revise Draft Section 61 findings for each State agency	Cert. scope	Completed
	Responses to Comments		
56	Write responses to comments	Cert. scope	Completed
	Wastewater consultation - Everett, MWRA, and MassDEP		
57	Consultation with Everett, MWRA, and MassDEP	Certificate	Completed
	Greenhouse Gases		
58	Update analysis to stretch code	Certificate	Completed
	GENERAL - Roadway Mitigation Plans		
59	Plans need to show more detail and features such as proposed lane widths, offsets, layout lines, road jurisdiction, land use including access drives	Certificate	Completed

1.5.2 BOSTON TRANSPORTATION DEPARTMENT (BTD)

The Proponent continued its diligent efforts to consult with the Boston Transportation Department (“BTD”) regarding traffic and transit issues after the Secretary’s Certificate. In November 2014, the BTD finally agreed to meet with the Proponent and, over the course of the next twelve weeks, the Proponent met with the BTD on seven occasions, including a joint meeting with the MBTA and BTD on January 26, 2015. These meetings covered a wide range of traffic and transit issues of interest to the City of Boston.

Over the course of those meetings, the BTD requested additional analyses, all of which have been completed, including additional traffic counts, conducted by the Proponent in December 2014, along Broadway/Alford Street (Route 99) and in Sullivan Square to ensure that the completion of the Alford Street Bridge and Tobin Bridge projects did not materially affect traffic. In addition, at the BTD’s request, the Proponent also conducted a sensitivity analysis of transit ridership to ascertain the impacts of projected transit usage on the road network and a reanalysis of anticipated parking utilization to confirm the validity of those estimates, including by comparison to other identified casinos.

There was also extensive consultation with the BTB regarding the Proponent's plans to mitigate the impacts of the Project on Sullivan Square. A number of the BTB's requested modifications to that plan were incorporated including the installation of conduit from Sullivan Square to Austin Street to tie that part of the traffic signal network into the BTB's command center, adjustments to lane geometry along Alford Street (Route 99), and a reconfiguration of Sullivan Square roads to better integrate the MBTA's bus operations at Sullivan Square Station with general traffic.

The Proponent will continue to meet with BTB as the design of the Project, including the Sullivan Square mitigation, progresses.

Table 1-4 sets forth the information/actions requested by the BTB and the Proponent's response.

Table 1-4: Boston Transportation Department Coordination Summary

Meeting Date	Information Requested by BTB	Action by Proponent
November 7, 2014	Consider alternatives that divert traffic away from the rotary.	Performed analysis of two options and discussed at next meeting
	Re-count all Boston intersections and Route 99 in Everett/Boston.	Completed December 5-6, 2014
	Warrant analysis of the intersection of Cambridge Street/Spice Street.	Warrant analysis completed. To be included in design report
	Consider adding improvements for pedestrian connectivity to the east side of rotary.	Improvements added to plan
	Connect Sullivan Square intersections to Austin Street intersection via hardwire connection.	Proponent agreed. Preliminary design plan submitted to the BTB.
November 13, 2014	The BTB recommended two lanes on Alford Street at Maffa Way and continuing onto Cambridge Street toward Somerville.	Plan modified to reflect two lanes on Alford Street and Cambridge Street towards Somerville.
	Update the plan to reflect the City's recently installed bicycle pavement markings in the rotary.	Plan updated.
	Bus circulation and parking layout in front of Sullivan Square station need further thought and coordination with MBTA.	Plan revised to reflect updates to improve bus operations and preserve parking.

Meeting Date	Information Requested by BTB	Action by Proponent
	Consider improving Spice Street and D Street to redirect traffic on Cambridge Street that is bound for Rutherford Avenue.	Plan revised to include improvements to Spice Street and D Street.
	Send origin-destination data to the BTB.	Completed/provided.
December 9, 2014	Consider widening Beacham Street extension.	Discussed but not adopted because it did not produce improvements to LOS.
	Consider adaptive signal control for all signals.	The Proponent will consider as Project proceeds beyond concept level design.
December 17, 2014	Reviewed Stantec August 8, 2014 comment letter.	Completed.
	Memo summarizing parking strategy.	Completed/provided.
	Signal phasing diagrams to aid review.	Completed/provided.
	Provide sensitivity analysis of Austin Street/Gilmore Bridge/Rutherford Avenue intersections to show what would happen if some vehicles used the Gilmore Bridge.	Completed/provided.
	Reviewed draft interconnect conduit plans from Sullivan Square to Austin Street. BTB made a few comments.	Plans revised to reflect comments.
January 9, 2015	The BTB stated concerns over buses making left-hand turns from new Sullivan Station exit.	Left-hand turns were eliminated.
	The BTB stated concerns about geometric shift of roadway on Alford Street at Dexter.	Adjustments made to roadway alignment.
January 22, 2015	Provide updated trip generation.	Completed/provided.
	Revised Sullivan station access and circulation plans.	Revised plans discussed. Plans made for future joint MBTA/BTB meeting; meeting held on January 26, 2015.
	Volume diagrams with O-D data for specific intersections.	Completed/provided.
January 26, 2015	Requested that entrances to City-owned parking lots be	Plans to reflect entrances.

Meeting Date	Information Requested by BTB	Action by Proponent
	reflected in plans.	
	Requested weekday a.m. analysis.	Data to be provided.

1.5.3 MASSACHUSETTS DEPARTMENT OF CONSERVATION AND RECREATION (DCR)

MassDOT has informed the Proponent that MassDOT will be responsible for post-FEIR coordination regarding DCR's traffic and roadway-related concerns. DCR confirmed this at a meeting between DCR, MassDOT, and the Proponent on January 21, 2015.

1.5.4 MASSPORT

The Proponent has responded to the concerns raised in the Massport comment letter on the FEIR. On January 20, 2015 the Proponent met with Massport Planning, Aviation and marketing personnel to discuss Massport's concerns regarding the potential aviation impacts of the Project, labor market overlaps, taxi cab utilization and joint marketing efforts to foreign travelers. New information was provided to Massport on these topics and there was general consensus that labor market overlap was not likely to be significant in the regional context and that the technical study on aviation impacts would be reviewed as part of the FAA approval process. Agreement was reached to continue to coordinate as the Project progresses on several issues of common interest, especially the availability of taxi cabs through mutual aid agreements, and potential joint marketing for international travelers coming to the area.

1.5.5 MASSACHUSETTS WATER RESOURCES AUTHORITY

The Proponent has explored a number of I/I proposals with the MWRA over the past six months. Technical analysis was conducted by MWRA through flow modeling of various alternative connection points. The Proponent and City of Everett personnel worked to determine pipe locations and inverts, connection methods and potential costs. These discussions culminated in a joint meeting between the Proponent, City of Everett planning and engineering personnel, MWRA engineering and construction personnel, and MassDEP engineering staff on October 16, 2014. Various potential diversion points and potential beneficial outcomes were presented by the MWRA. However, there was not sufficient support for these alternatives substituting for the normal I/I mitigation required by the MWRA/MassDEP I/I mitigation policy and the City of Everett has therefore elected to pursue I/I removal directly within the existing collection system with funding provided by the Proponent.

1.5.6 MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL PROTECTION

The Proponent has collaborated with MassDEP on several fronts since the filing of the FEIR. The topics upon which the Proponent and MassDEP have collaborated include wetland resource delineation, remediation, I/I mitigation, the execution of a "fast track" agreement regarding the Chapter 91 licenses required in connection with the Project, and the remediation of contamination at and from the Project Site. The Proponent has agreed to share draft submittals with MassDEP prior to their submittal and MassDEP has agreed to review and comment on said draft submittals in the interest of efficiency.

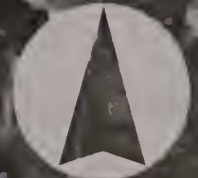


Wynn Resort in Everett
Everett, Massachusetts

Figure 1-1
Locus Map
Source: US Geological Survey, 1995



Project Site



Wynn Resort in Everett
Everett, Massachusetts

Figure 1-2
Locus Aerial
Source: MassGIS, 2008

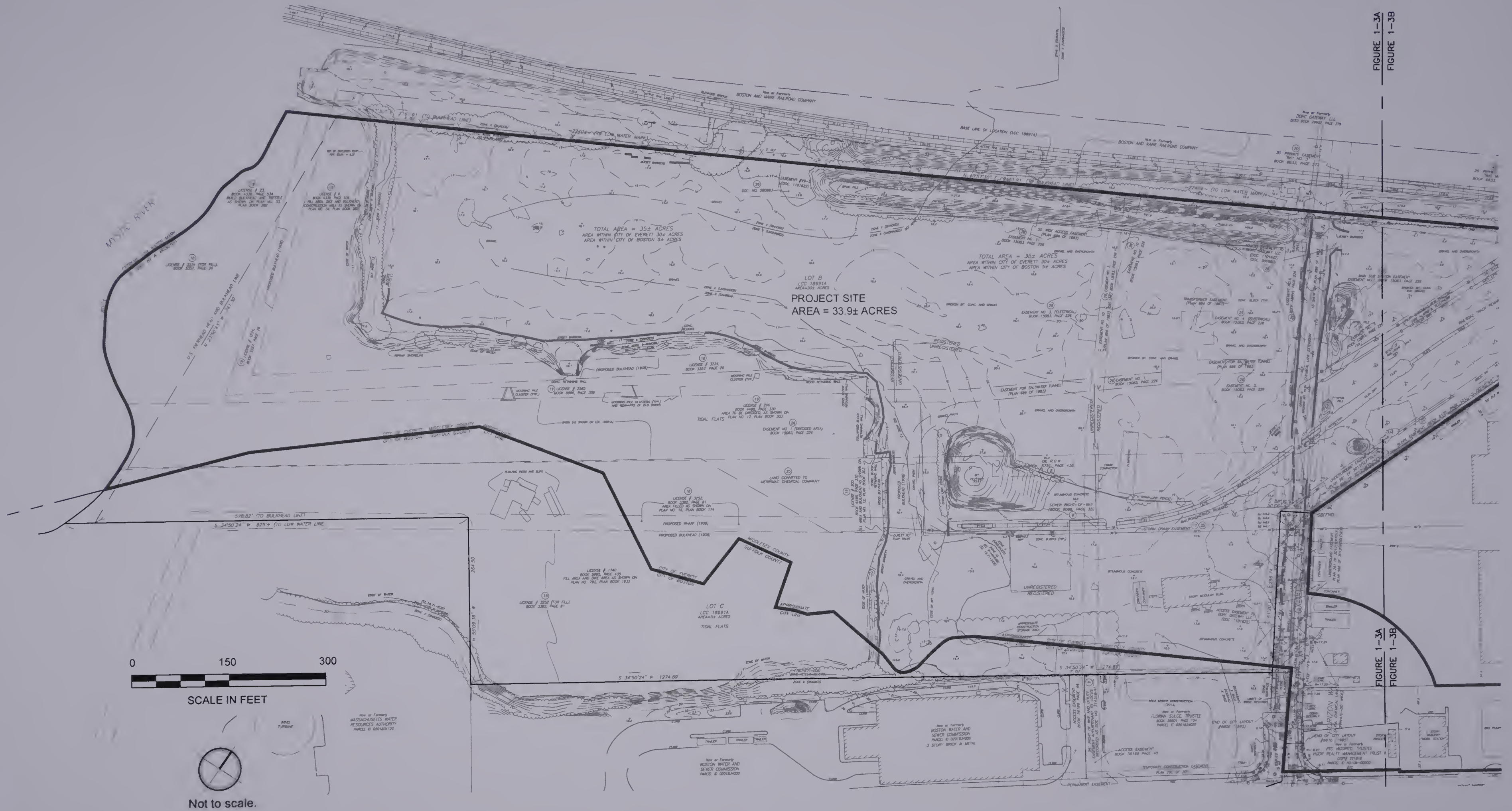
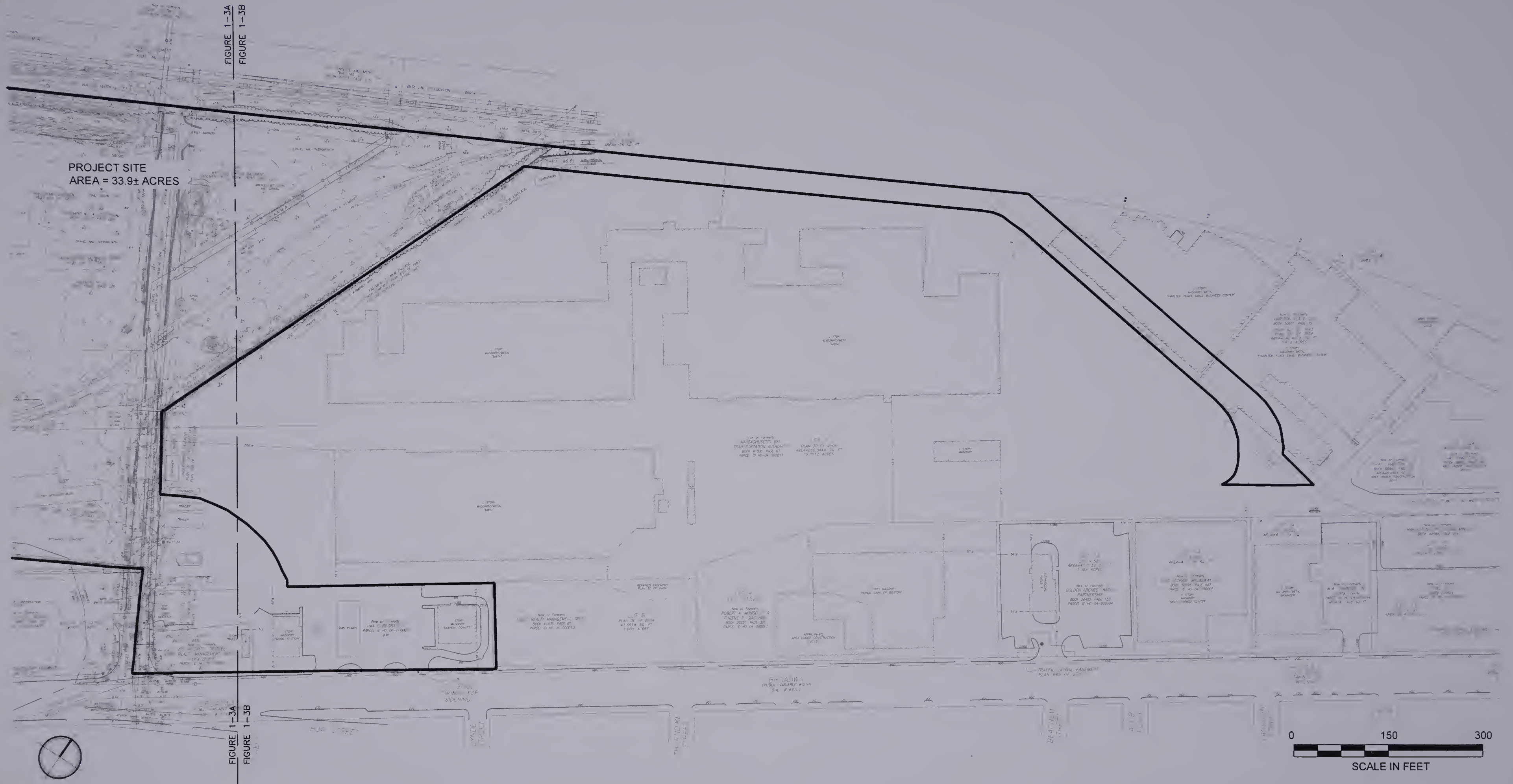
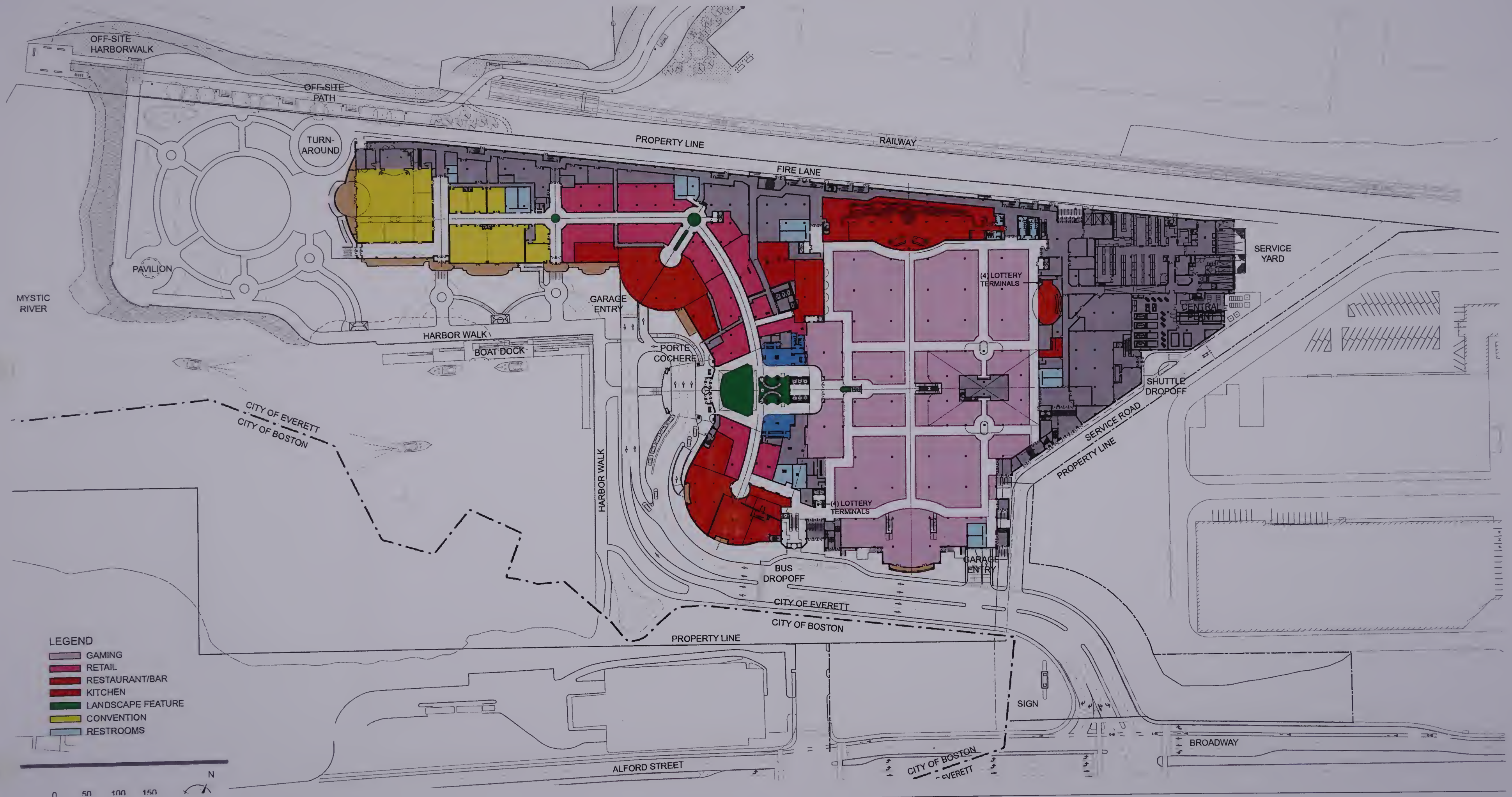
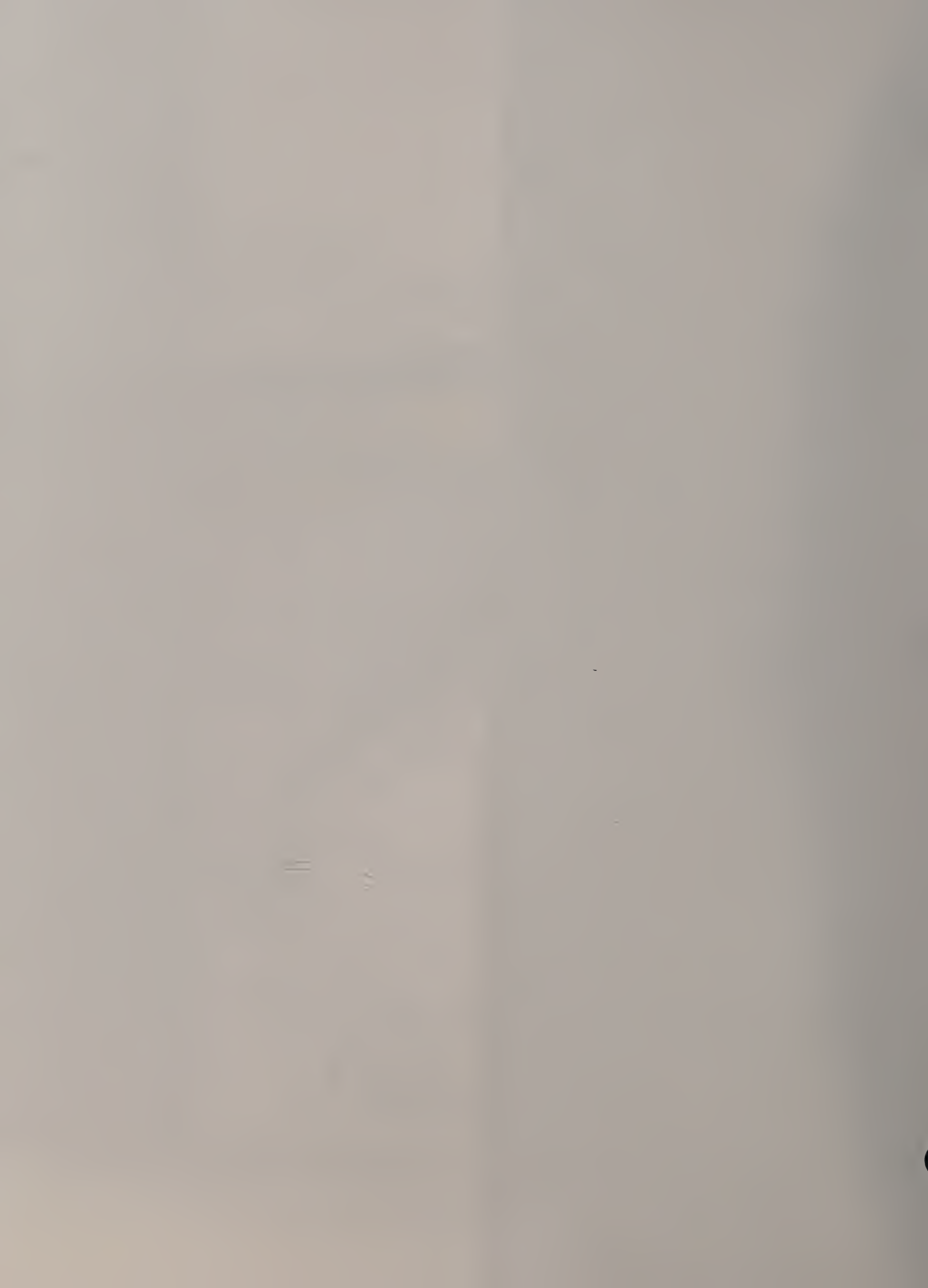


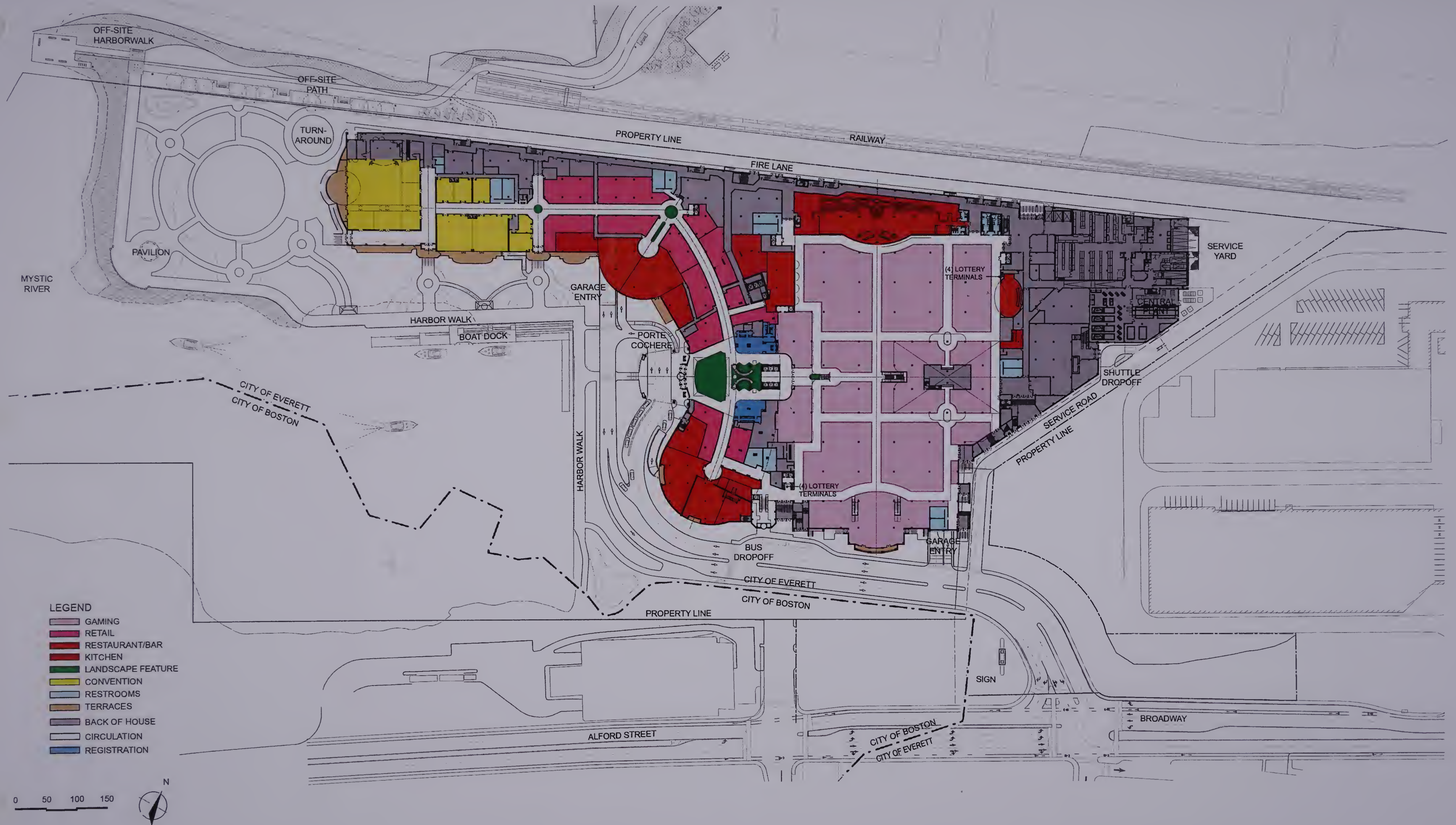
FIGURE 1-3A
FIGURE 1-3B

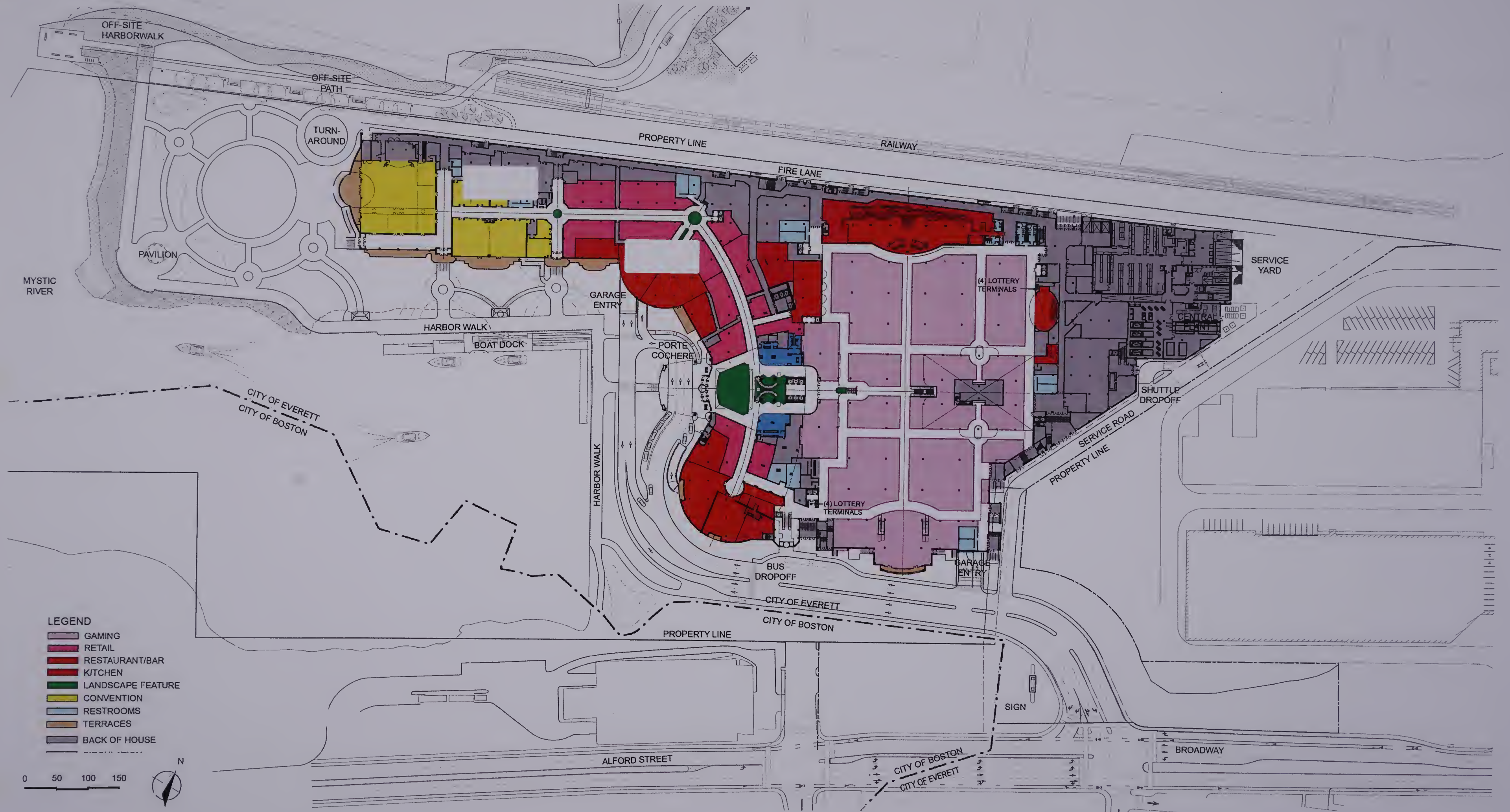
FIGURE 1-3A
FIGURE 1-3B

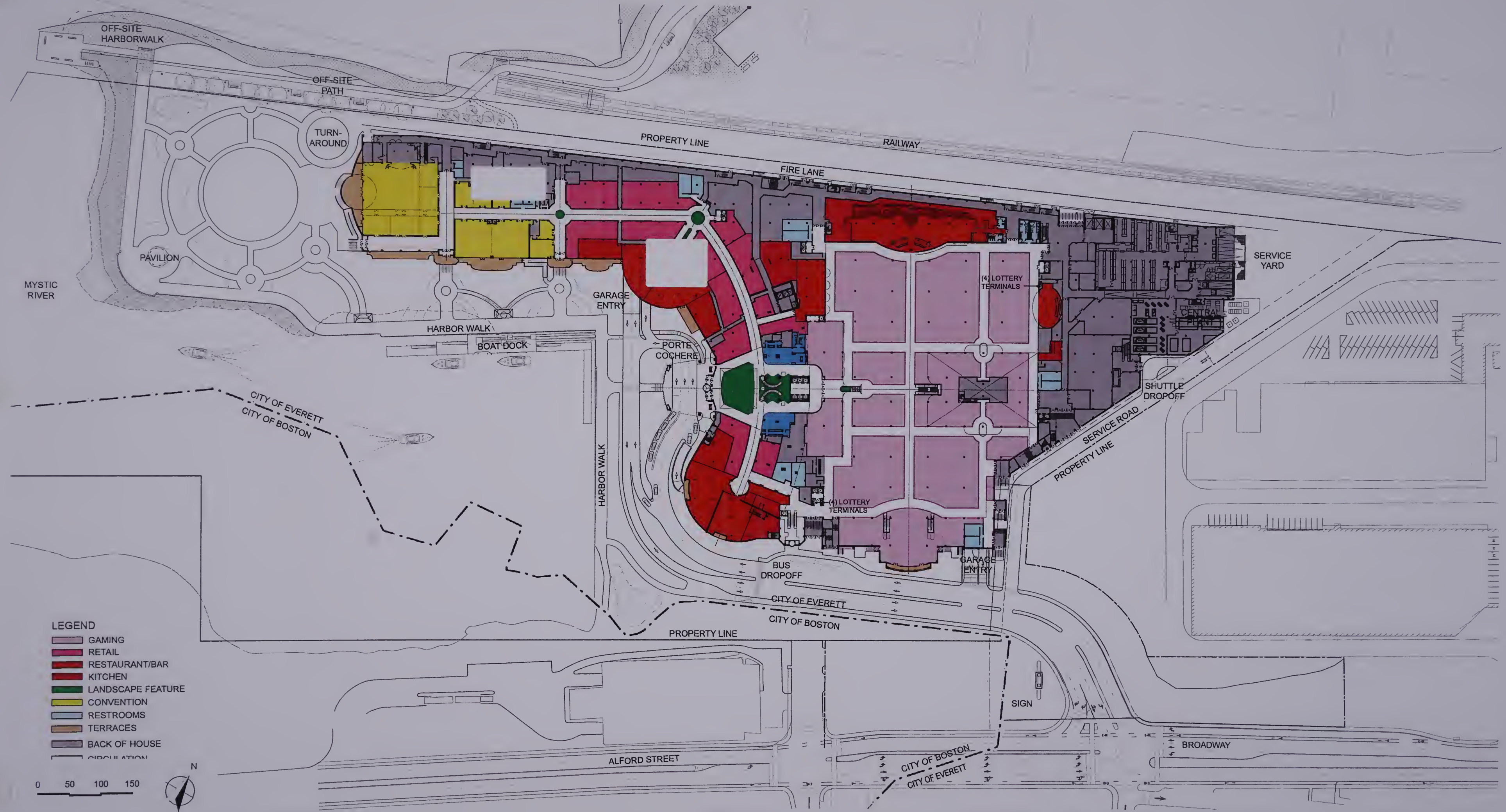


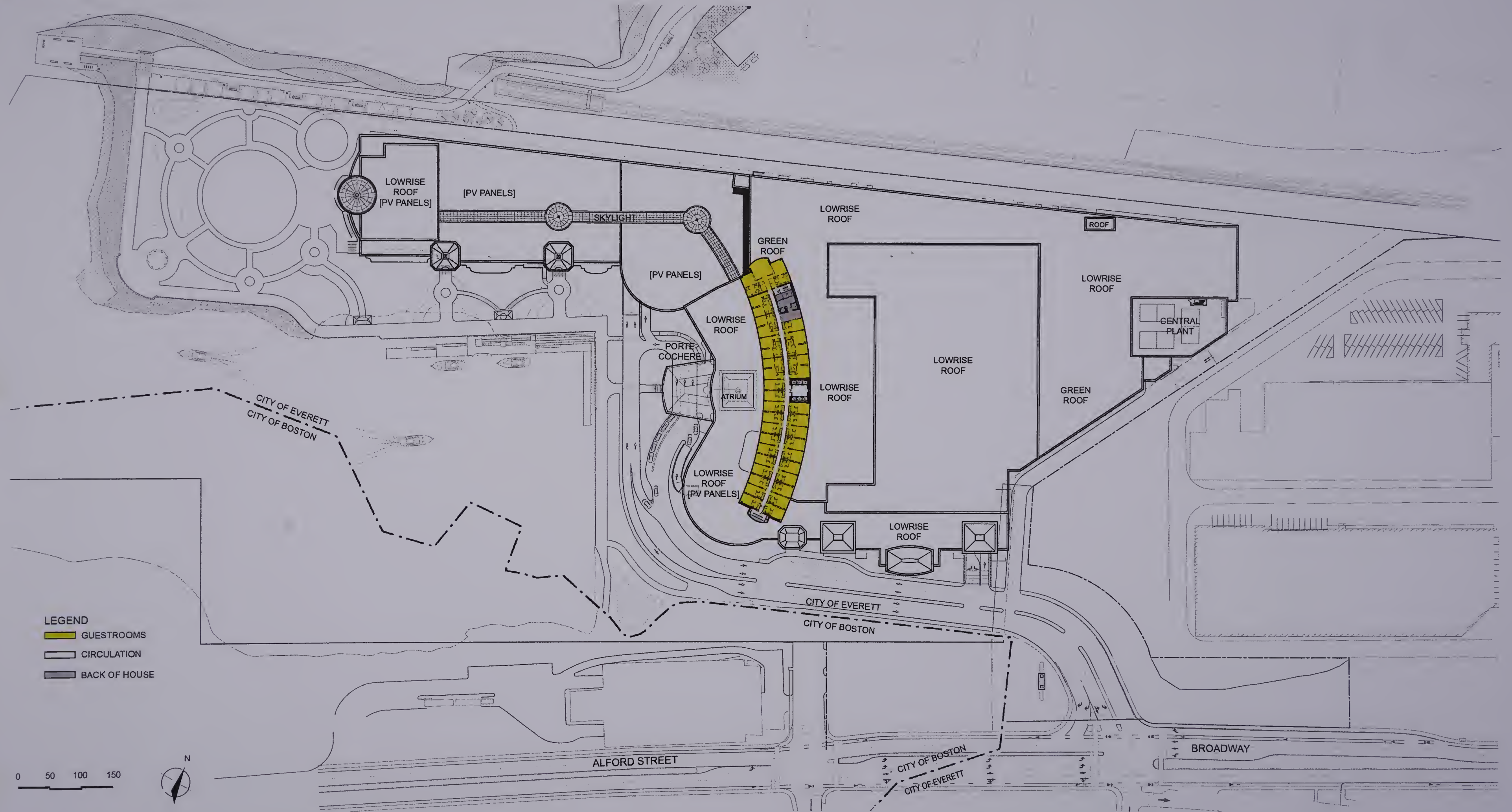


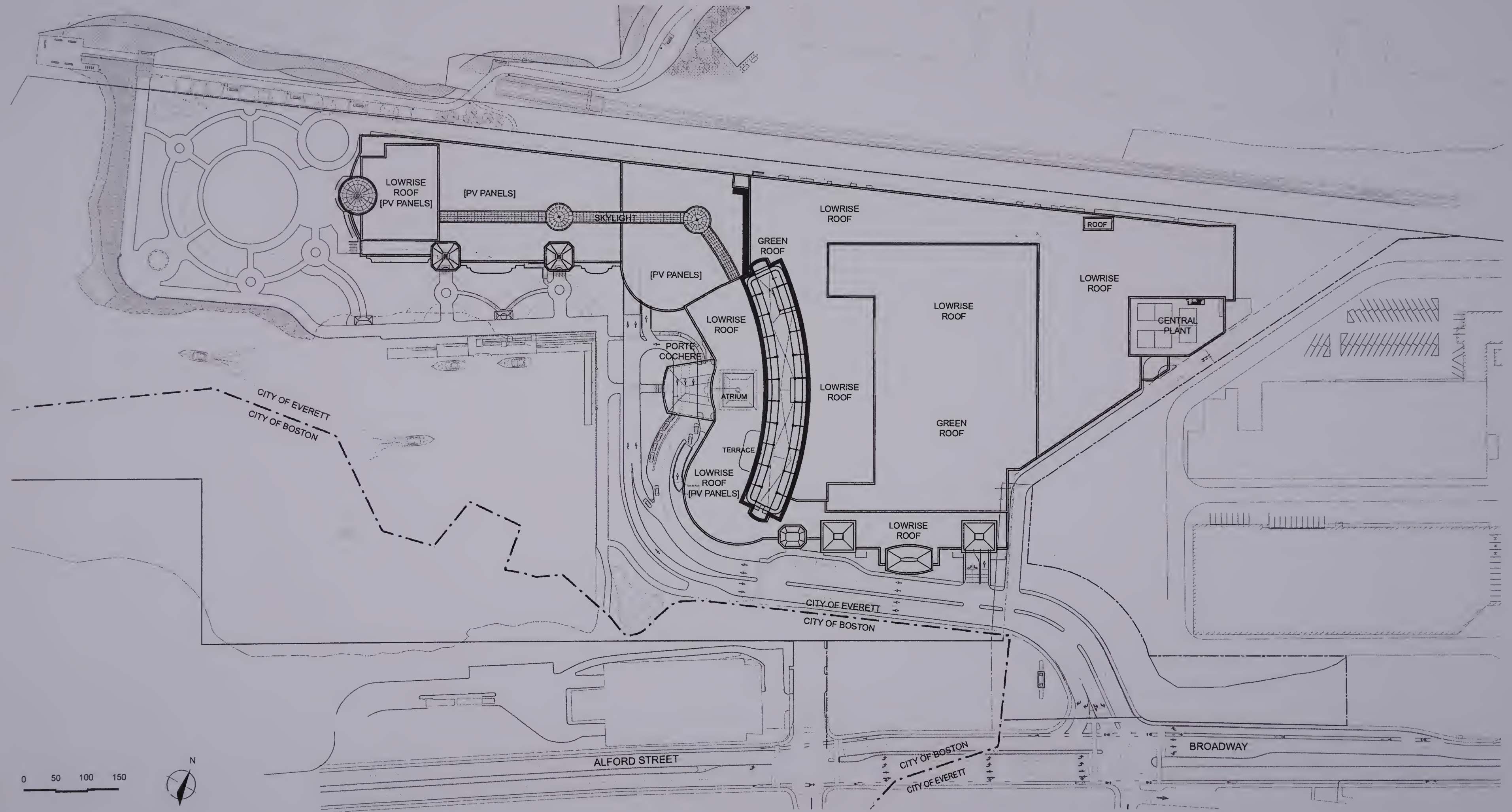


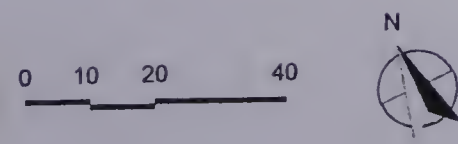


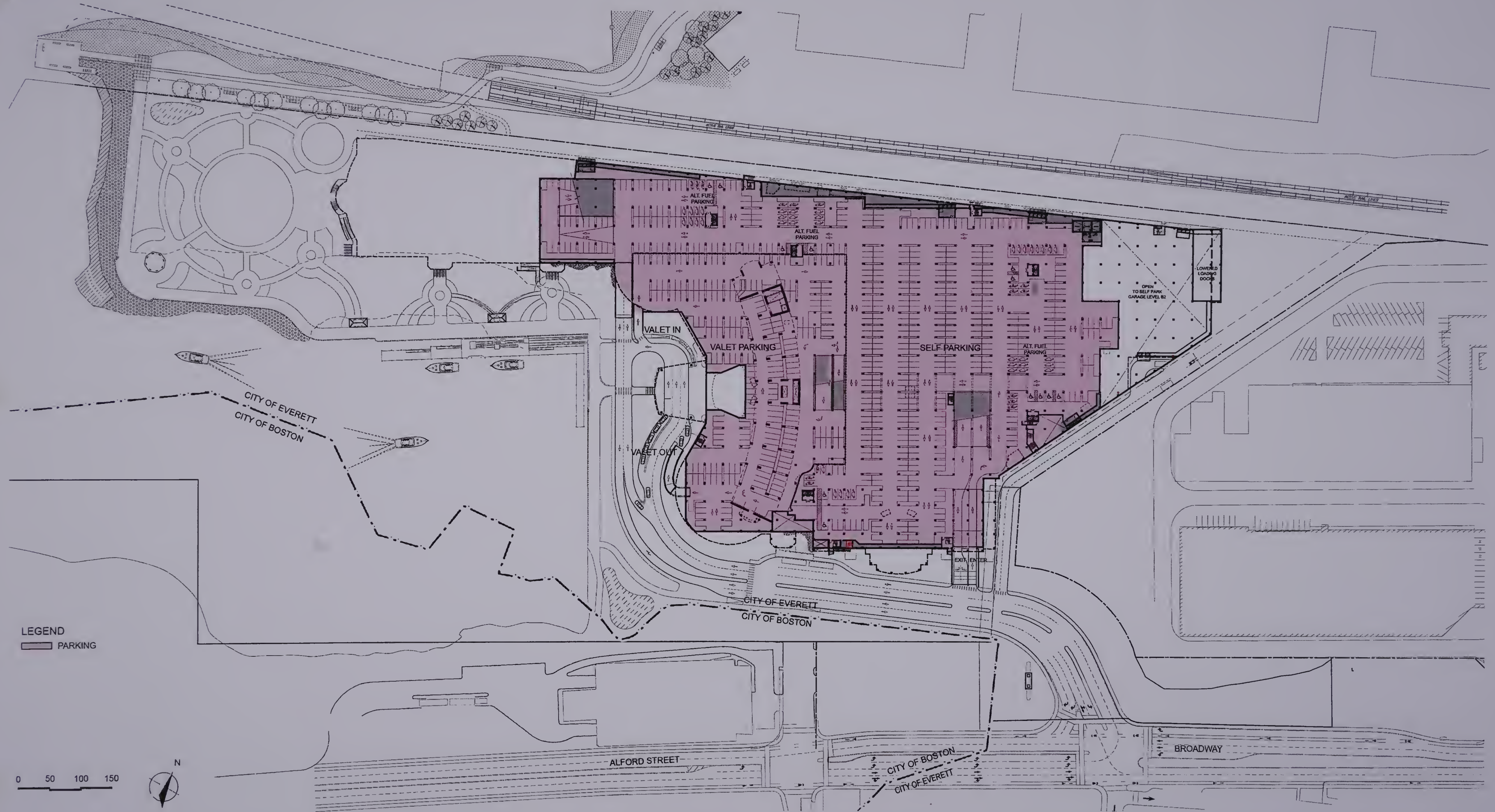


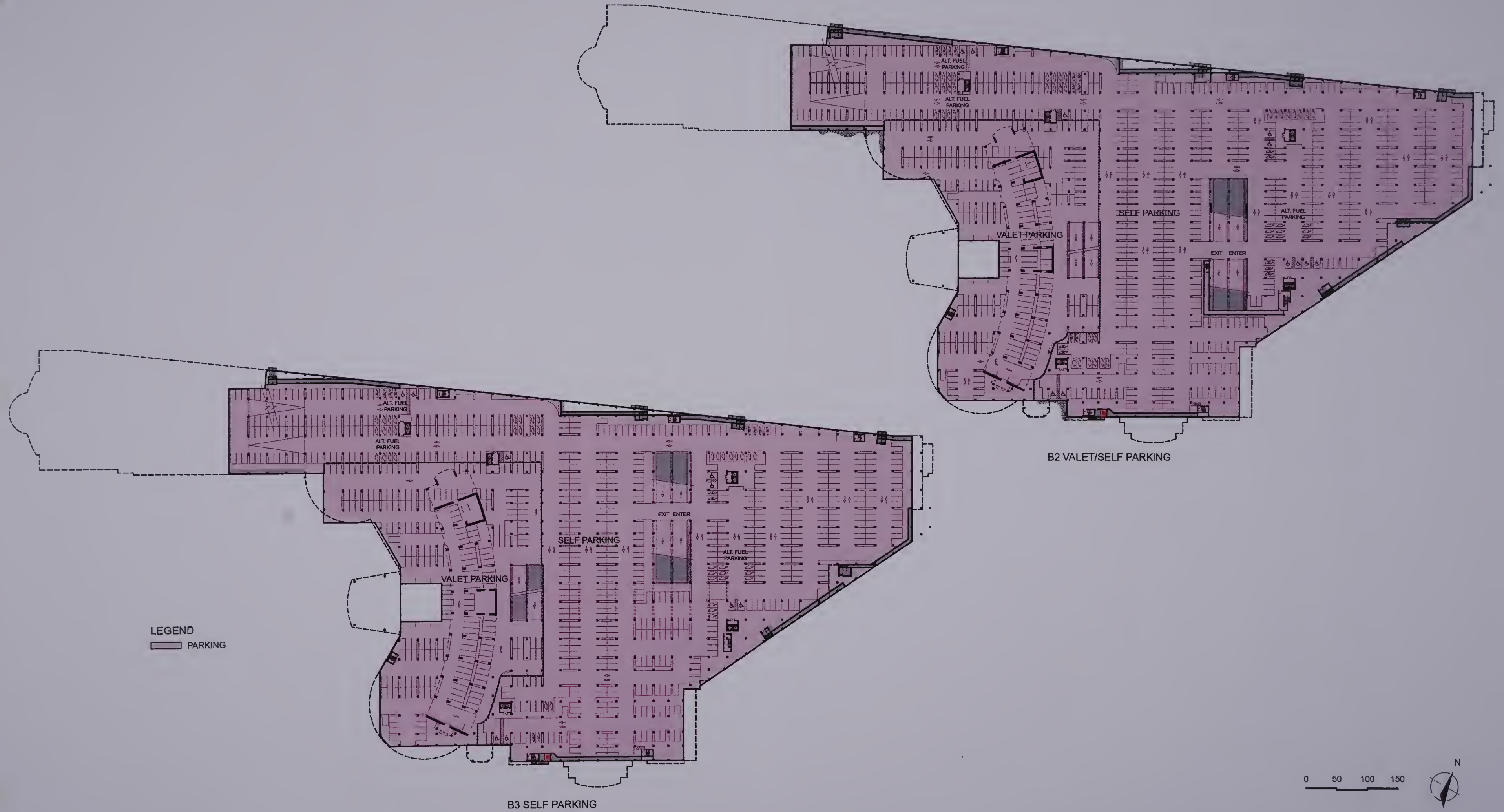


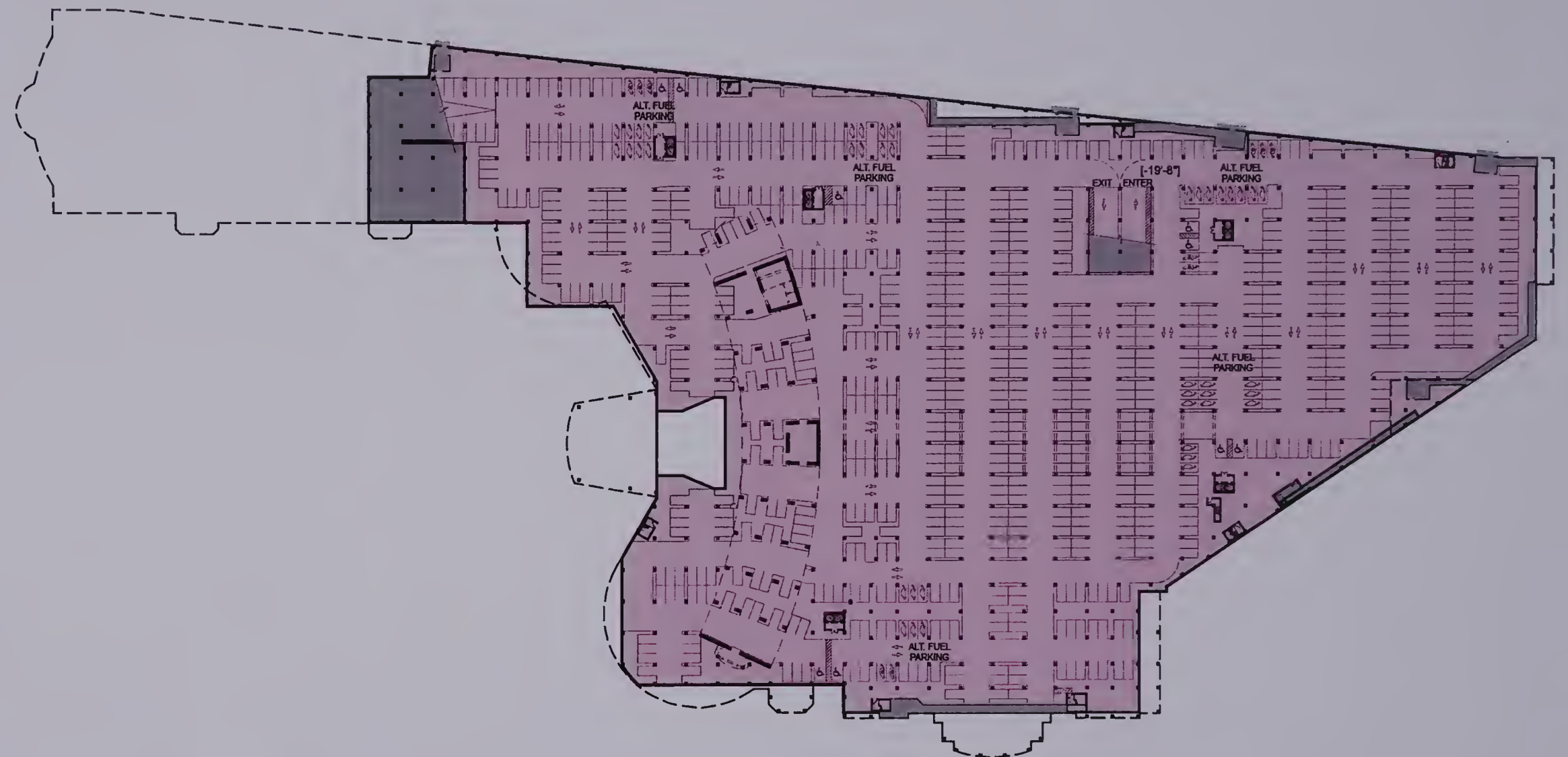















B4 SELF PARKING

WYNN EVERETT PARKING									
Level	Self Park	Valet	Total	ADA		LEED preferred 		EVSE 	
				Req'd	Prov'd	Req'd	Prov'd	Req'd	Prov'd
B1 - (+6'-4")	545	206	751	12	12	38	38	16	16
B2 - (-2'-8")	681	209	890	11	11	45	45	18	18
B3 - (-11'-8")	681	209	890	11	11	45	45	18	18
B4 - (-20'-8")	871		872	11	11	44	45	18	18
Total	2778	624	3403	45	45	172	173	70	70

Note: ADA is based from total parking - 20 for 1000 and 1:100 over 1000
 Van Accessible: 1 per 8 accessible spaces, 45 / 8 = 5.6 = 6 spaces required. 12 Provided on B1 parking level

NOTE: STAFF PARKING OFF-SITE

LEGEND
 PARKING

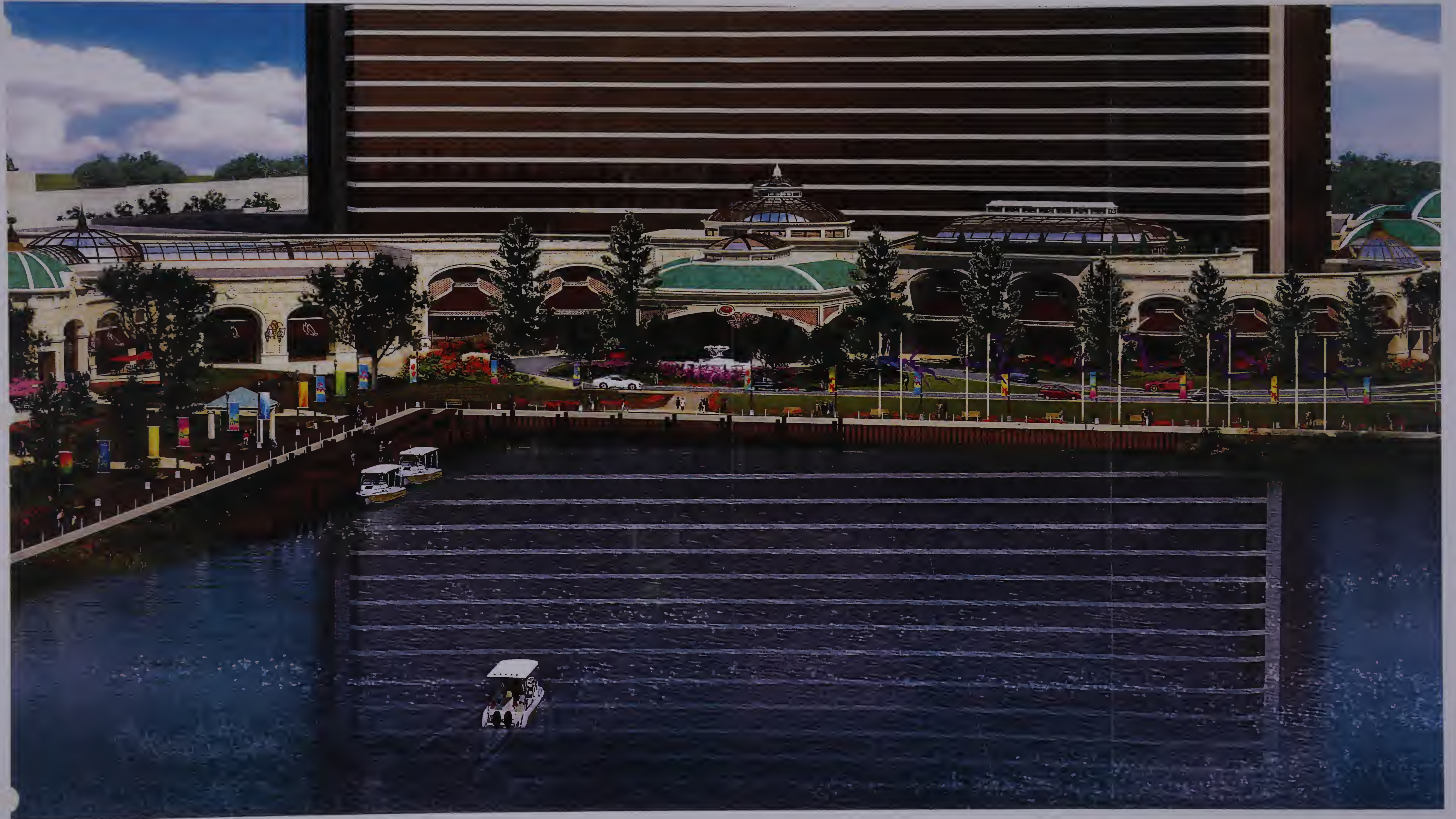






Wynn Resort in Everett
Everett, Massachusetts

Figure 1-15
Perspective View from Mystic River
Source: Wynn Design & Development, LLC, 2015



Wynn Resort in Everett
Everett, Massachusetts

Figure 1-16
Perspective View of Porte-Cochere
Source: Wynn Design & Development, LLC, 2015



Wynn Resort in Everett
Everett, Massachusetts

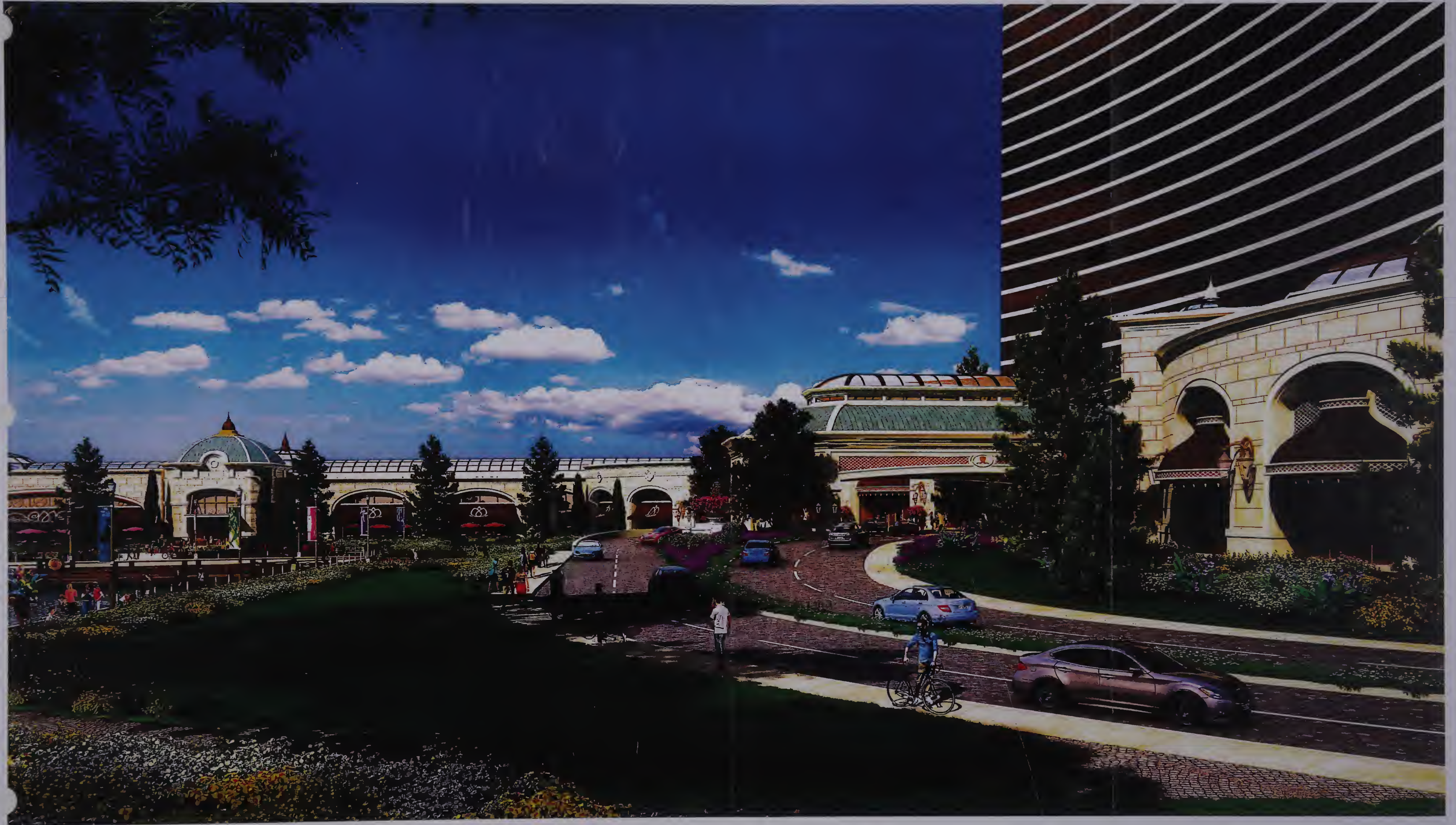
Figure 1-17
Perspective View from Entry Drive
Source: Wynn Design & Development, LLC, 2015





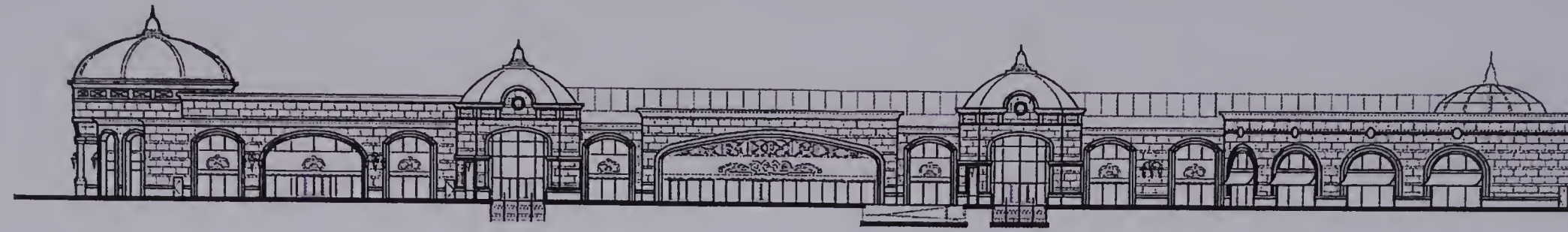
Wynn Resort in Everett
Everett, Massachusetts

Figure 1-18
Perspective View of Harbor Park
Source: Wynn Design & Development, LLC, 2015



Wynn Resort in Everett
Everett, Massachusetts

Figure 1-19
Perspective View of Porte-Cochere Approach
Source: Wynn Design & Development, LLC, 2015

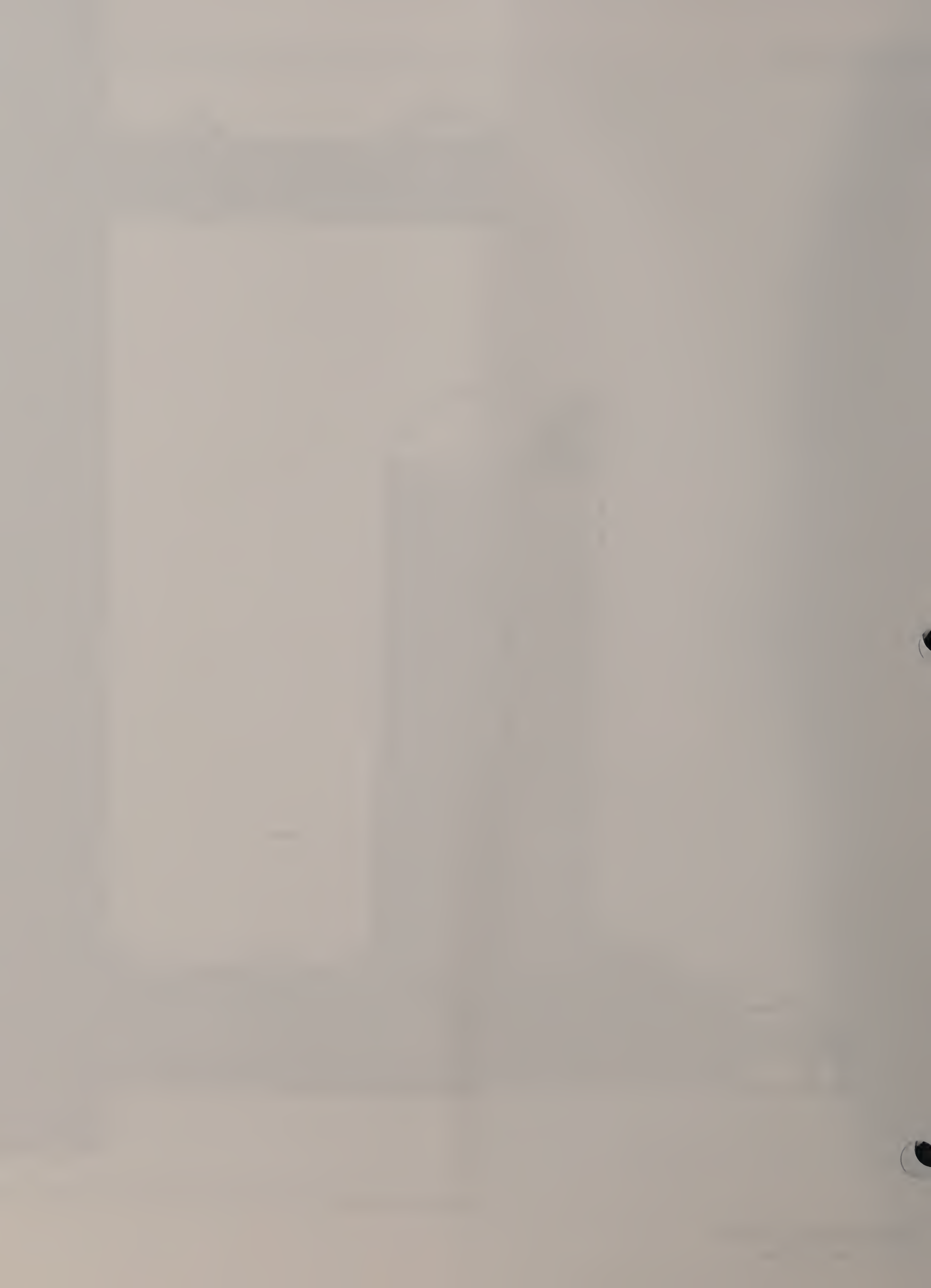


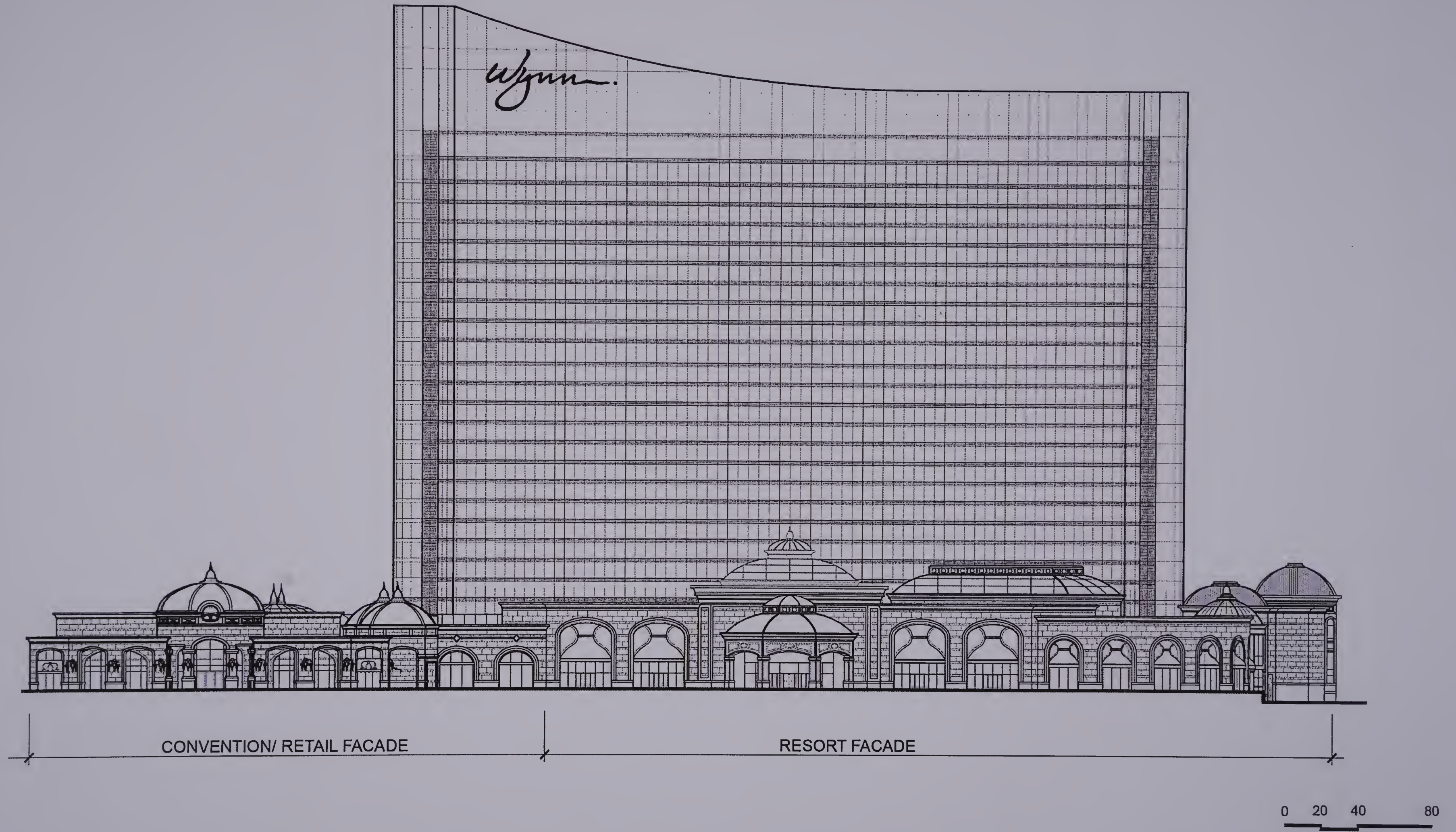
CONVENTION/RETAIL FACADE

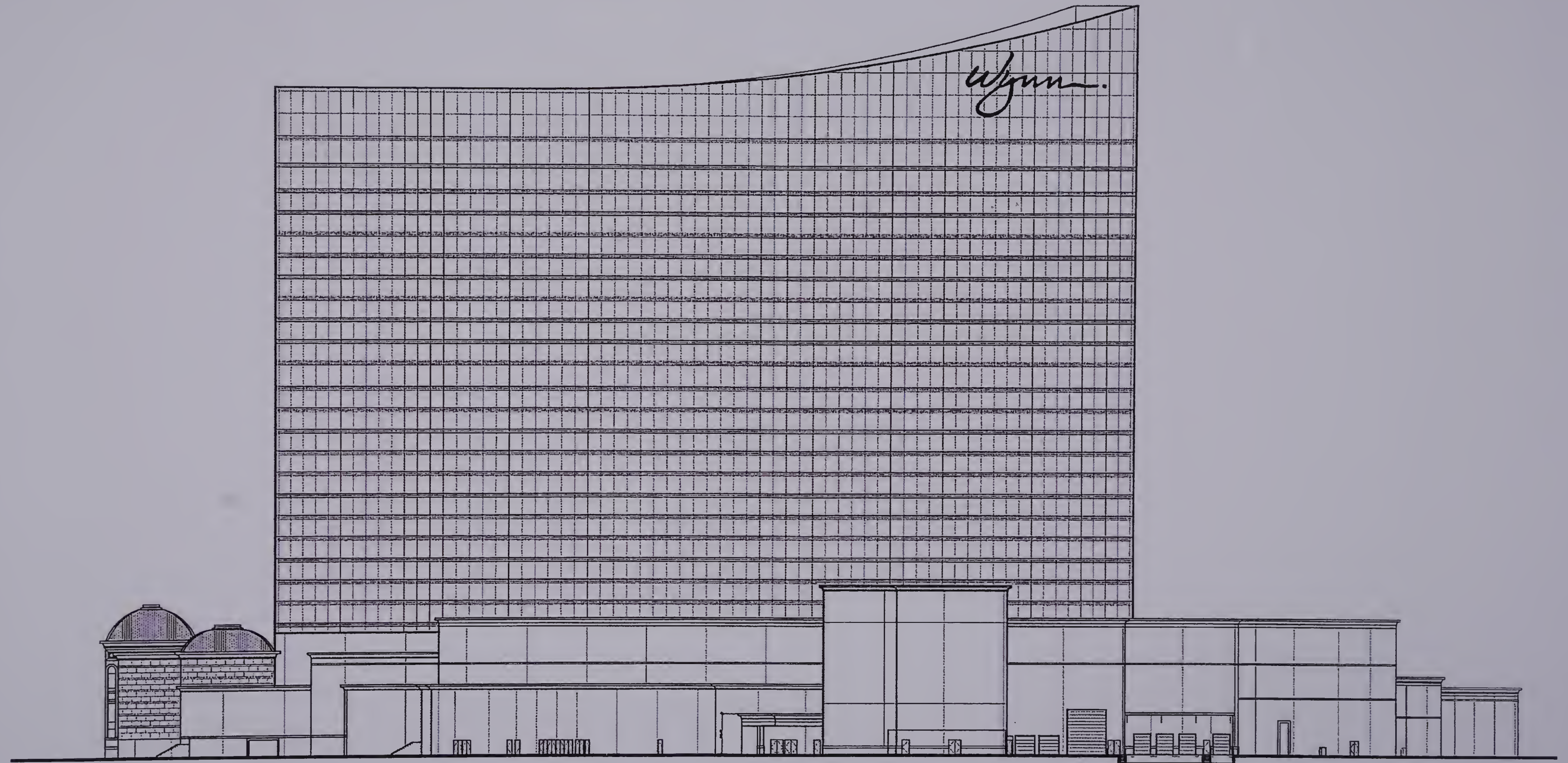


EAST RESORT FACADE

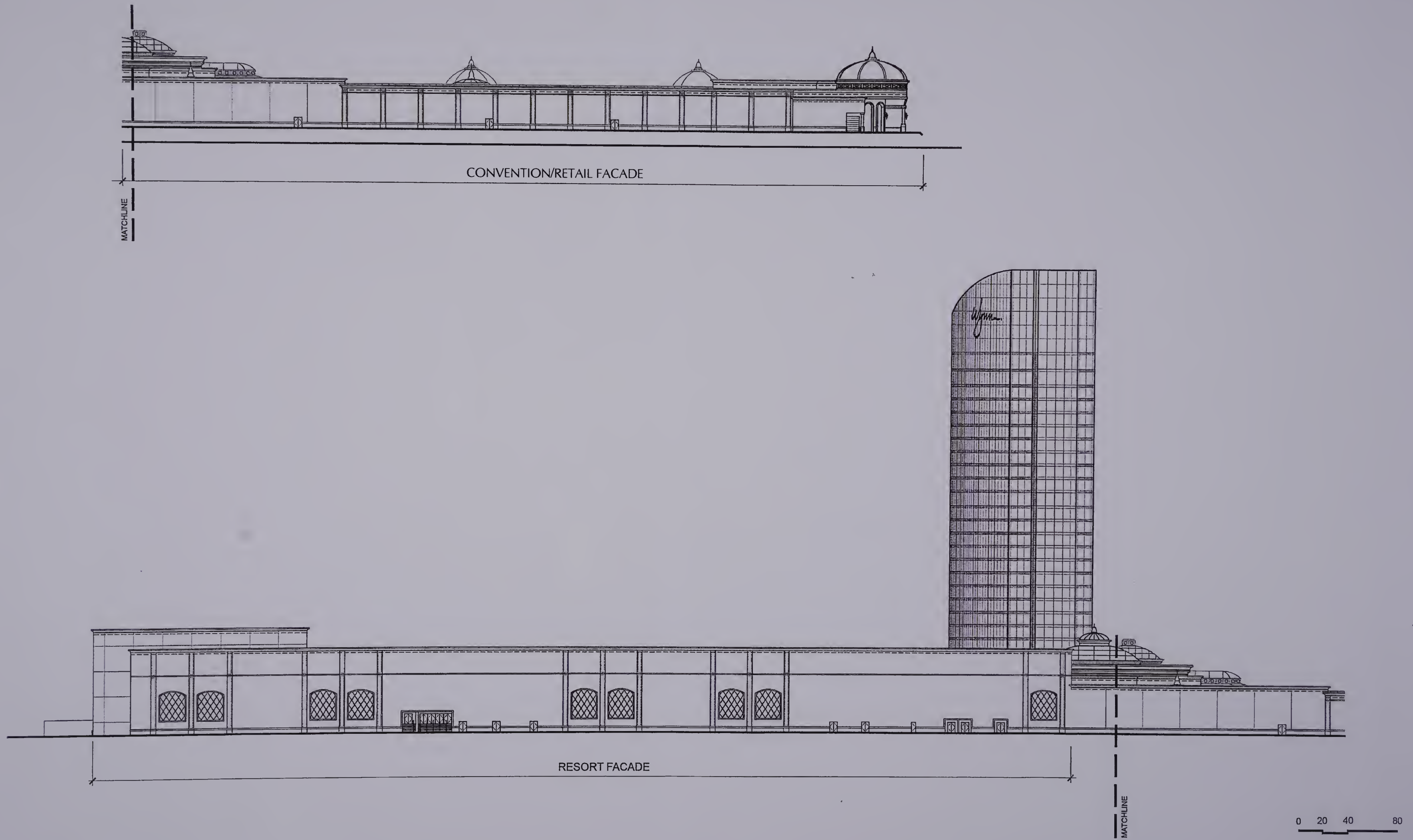
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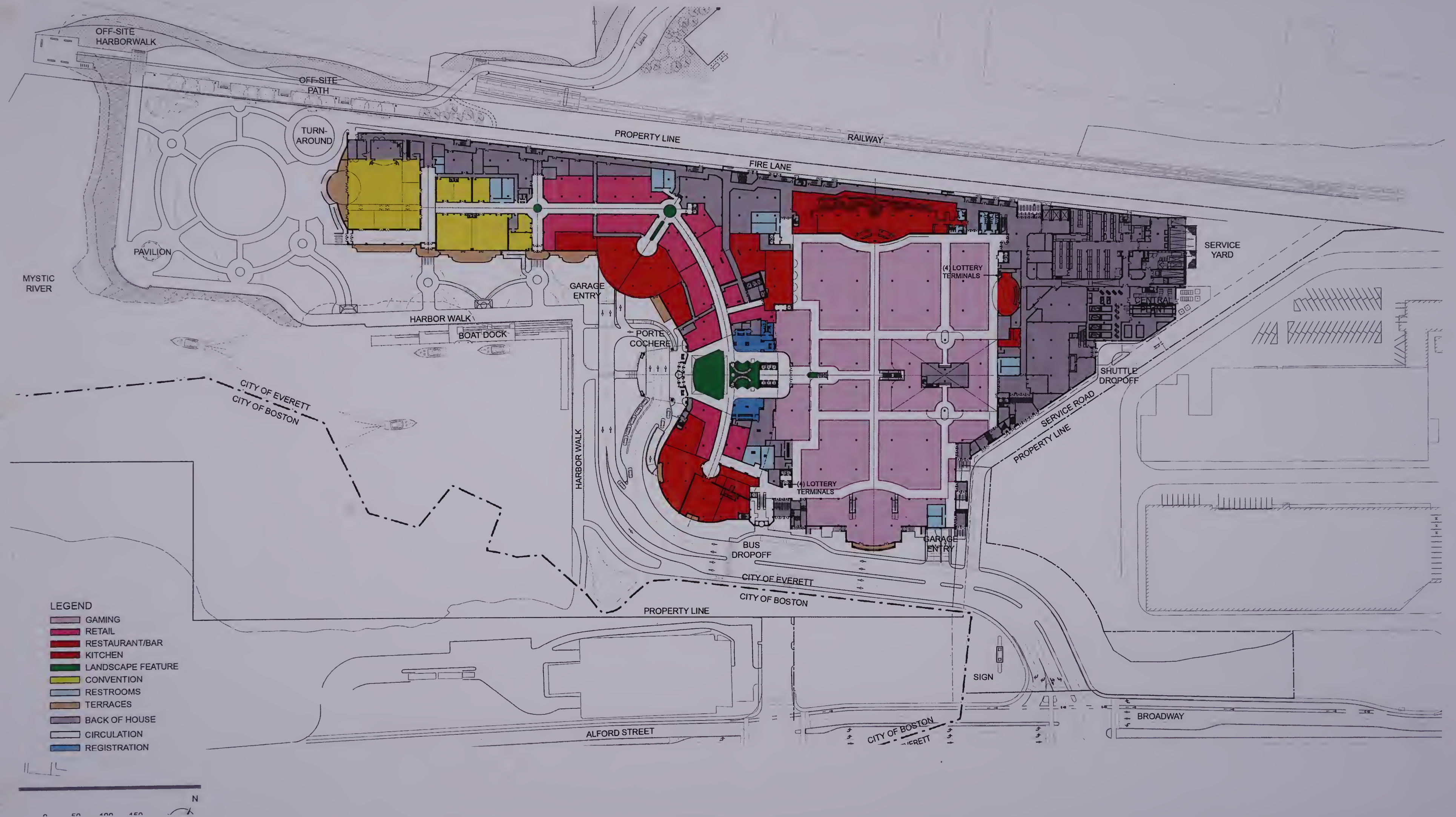


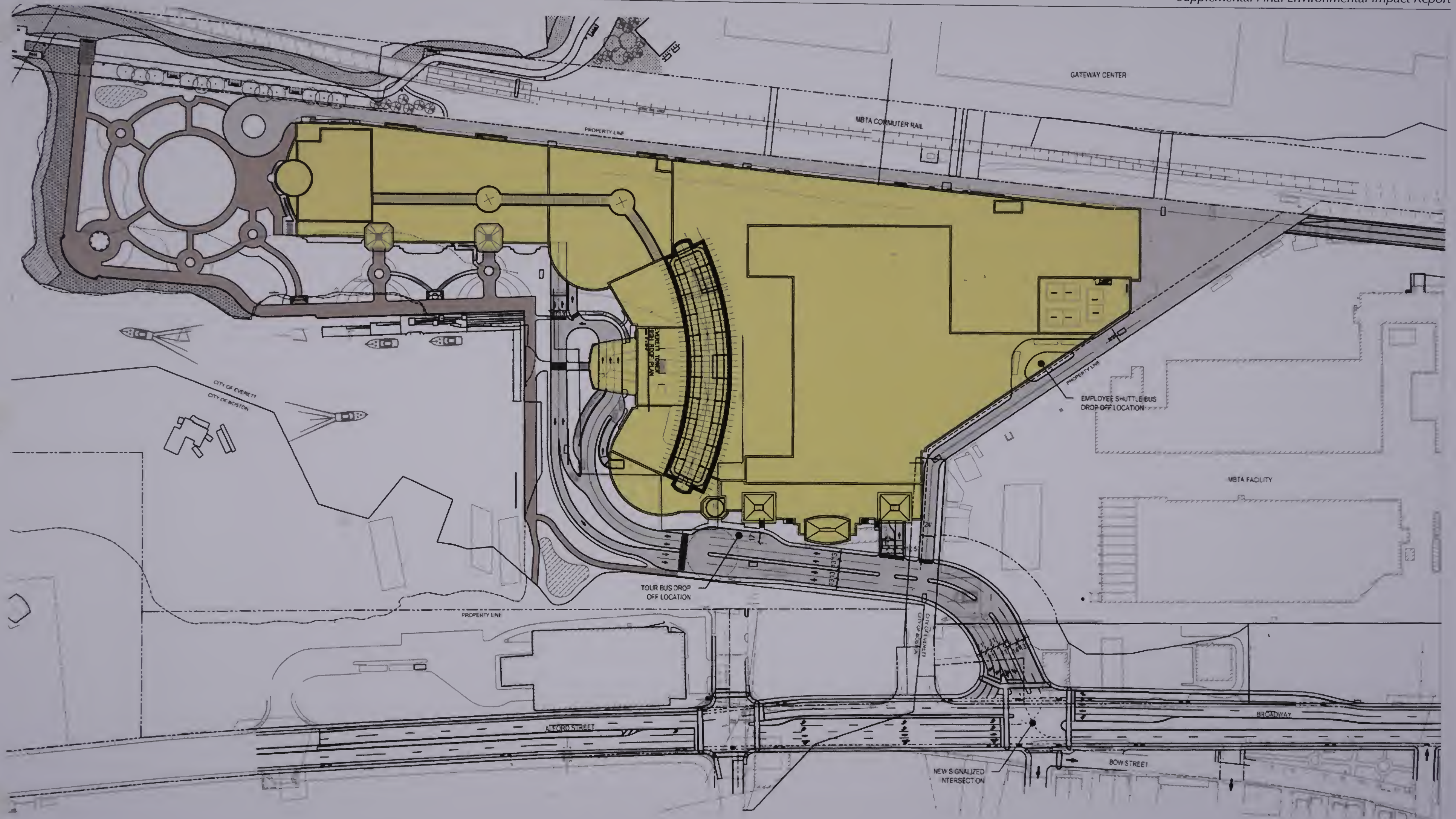


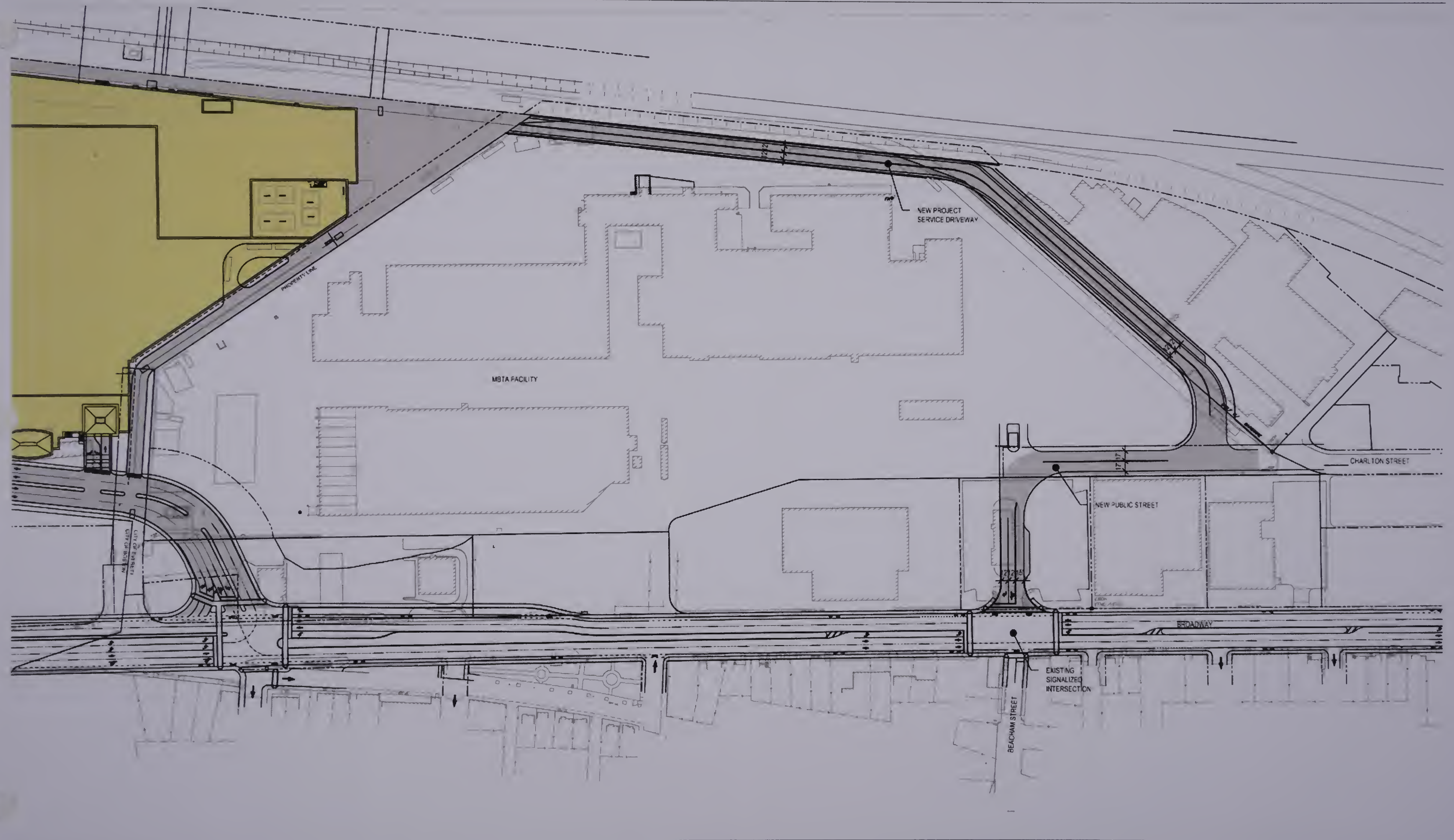


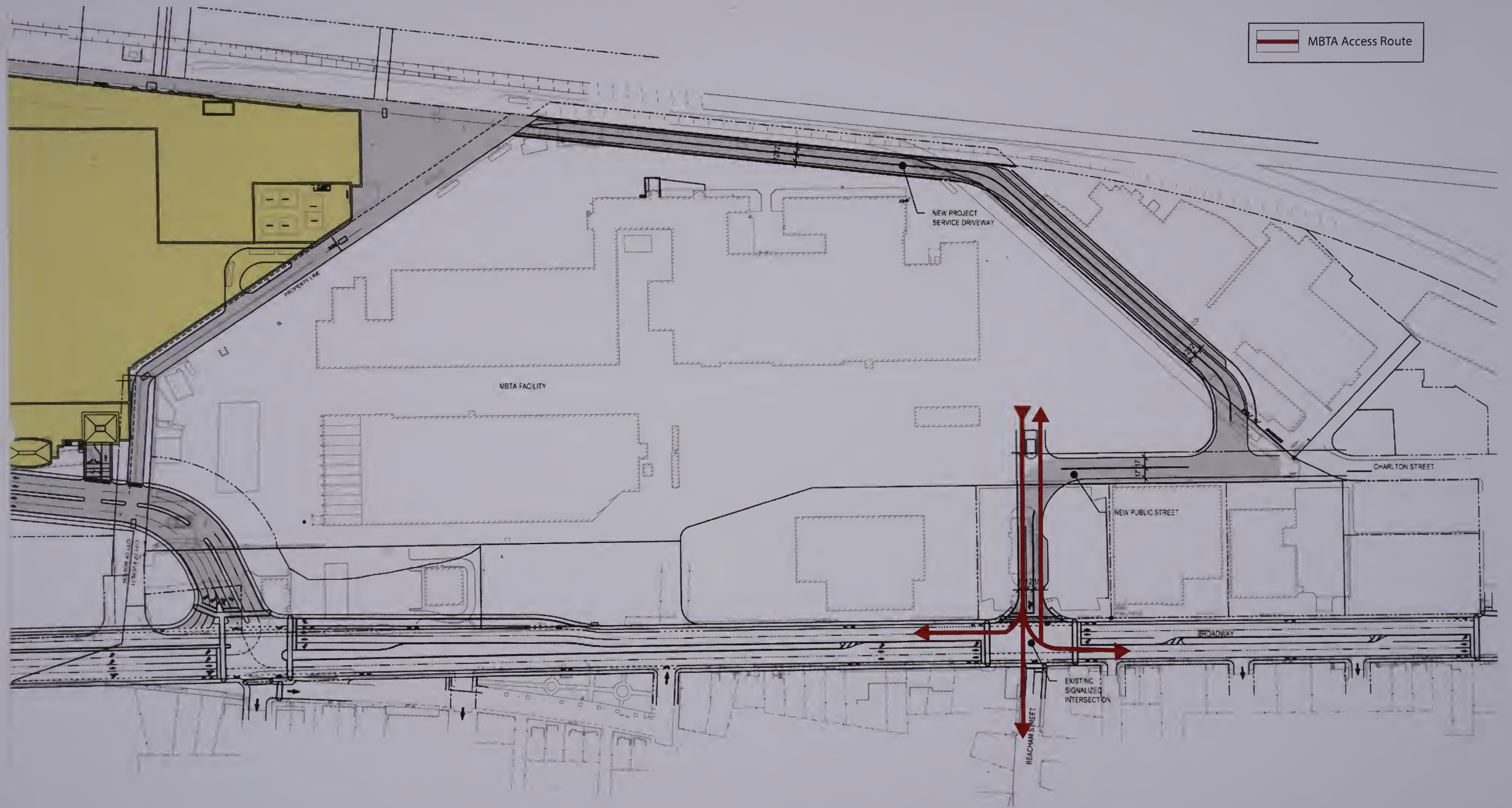
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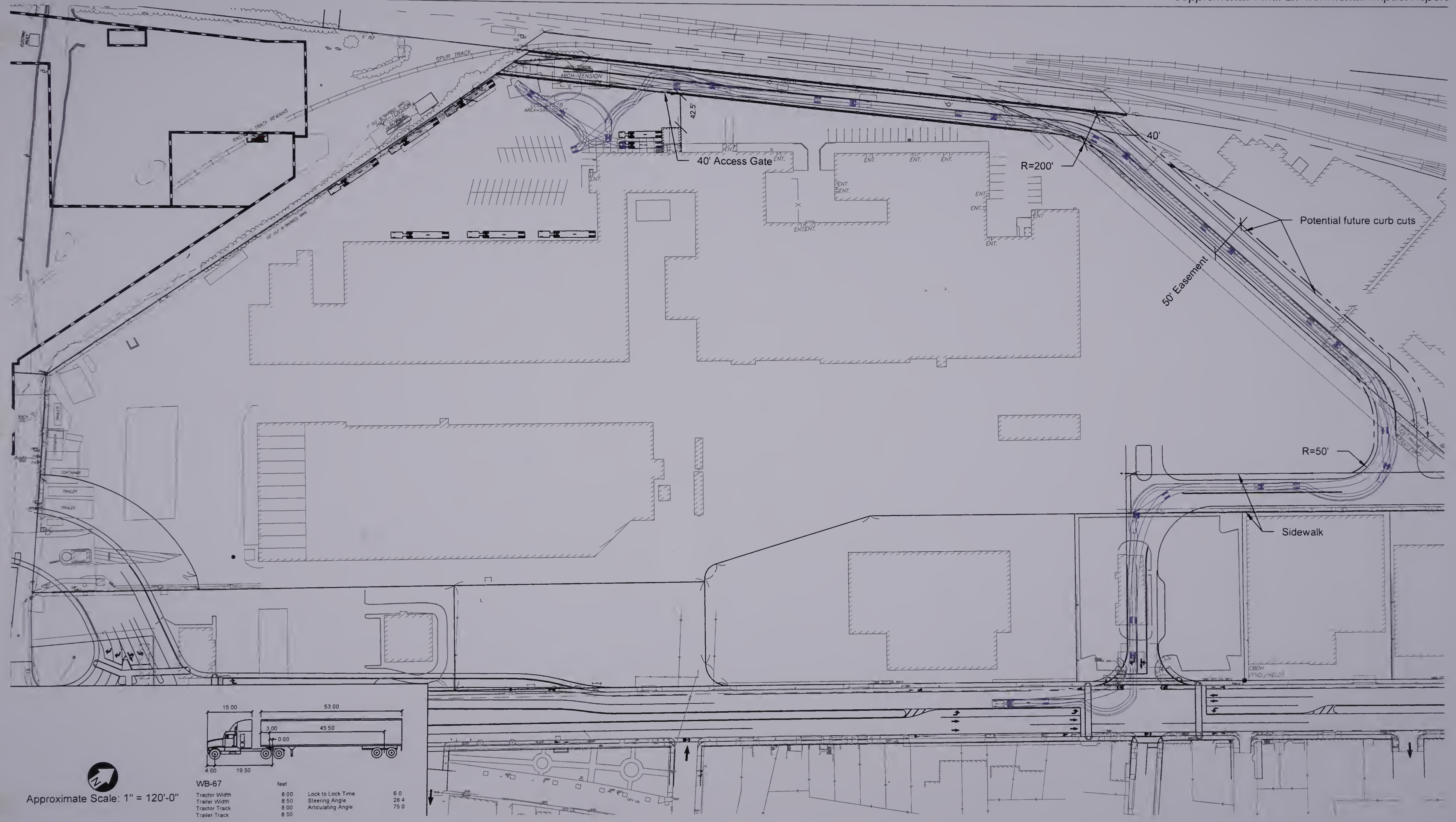




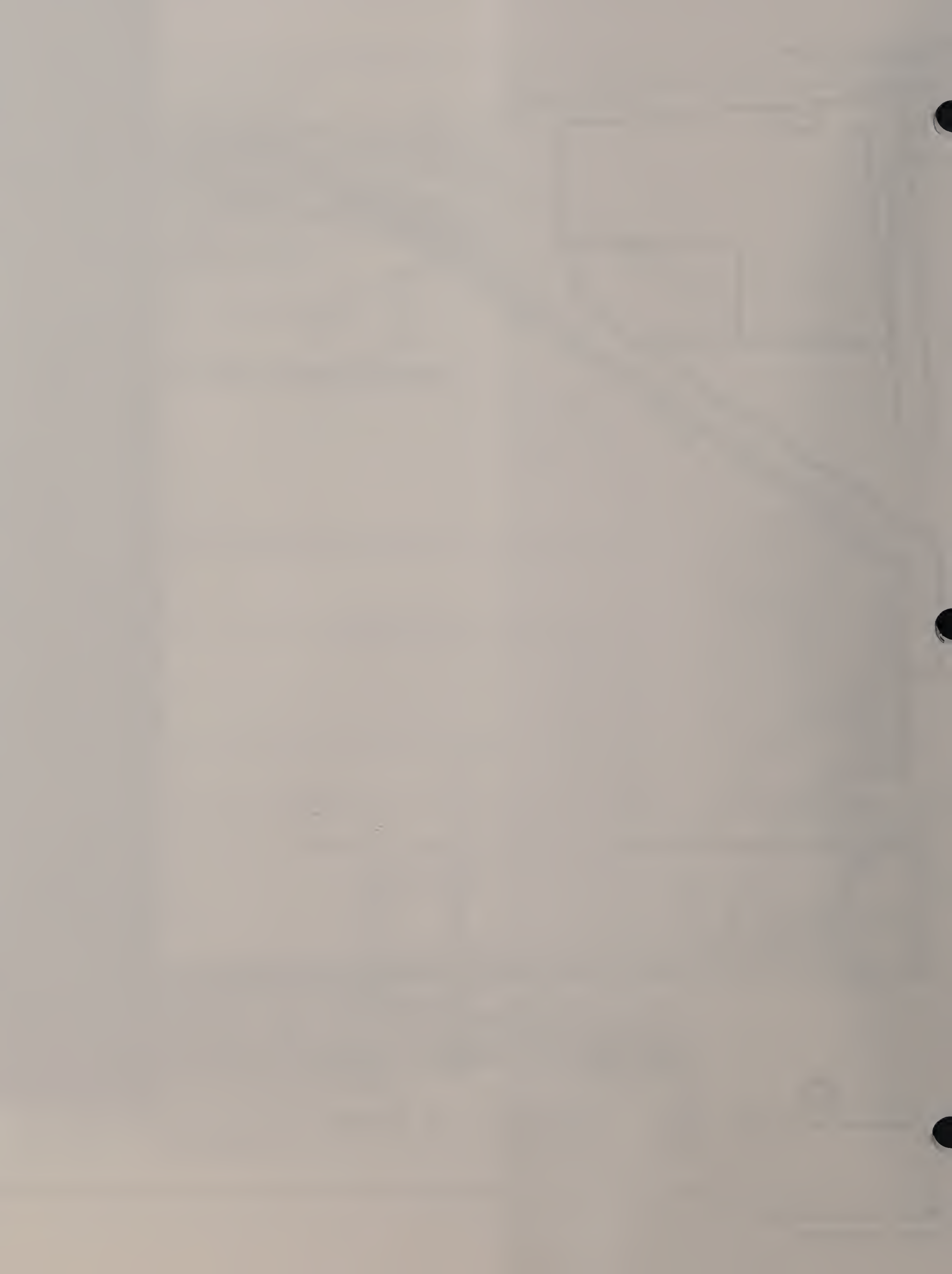








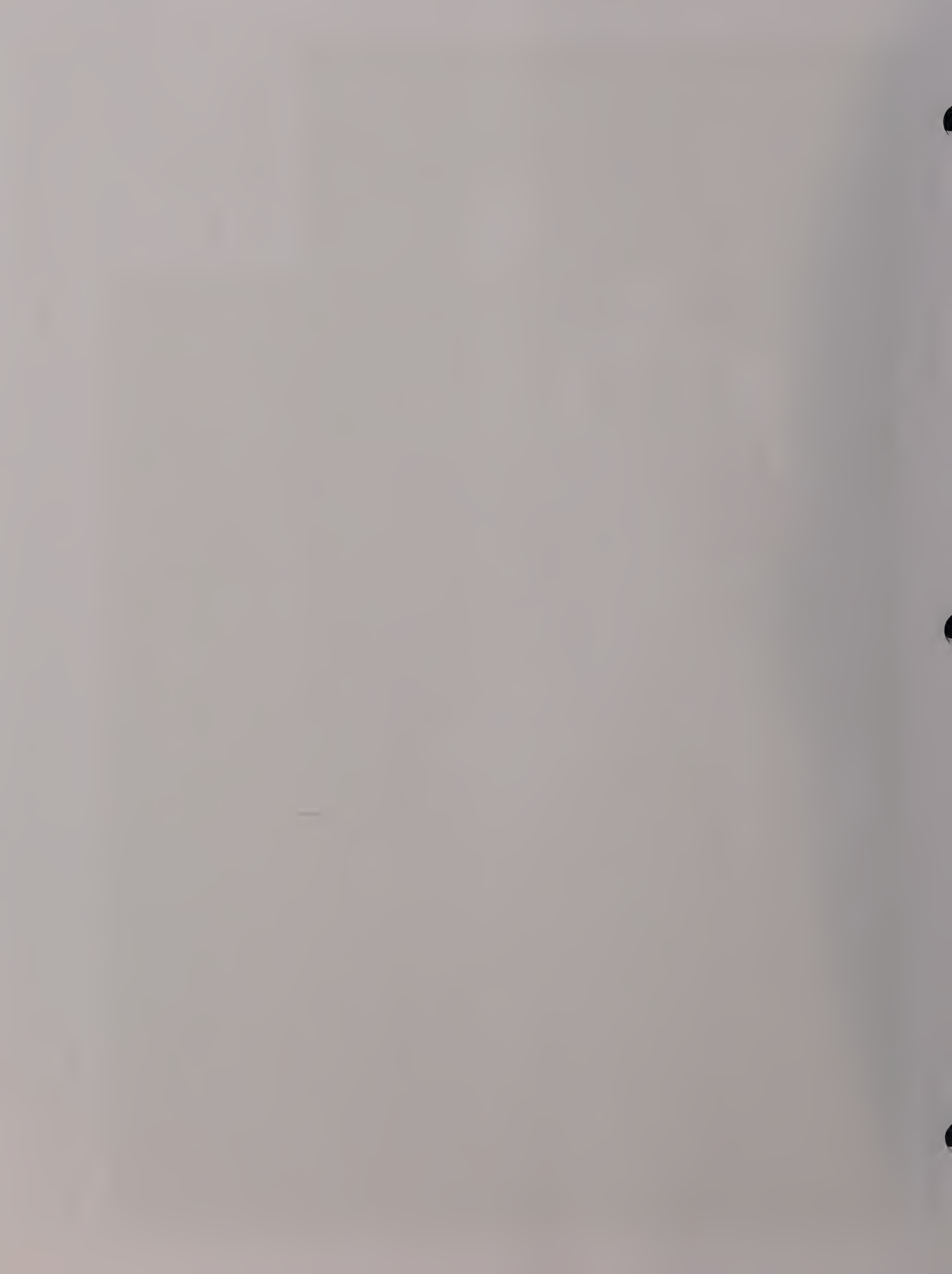
Approximate Scale: 1" = 120'-0"





Wynn Resort in Everett
Everett, Massachusetts

Figure 1-25
Chapter 91 Allowable Building Height
Source: ICON Architecture, 2014





9 am



3 pm



noon



6 pm

- Wynn Everett footprint
- Chapter 91 building envelope and Wynn Everett shadow
- Wynn Everett shadow
- Chapter 91 jurisdiction line
- Chapter 91 baseline shadow

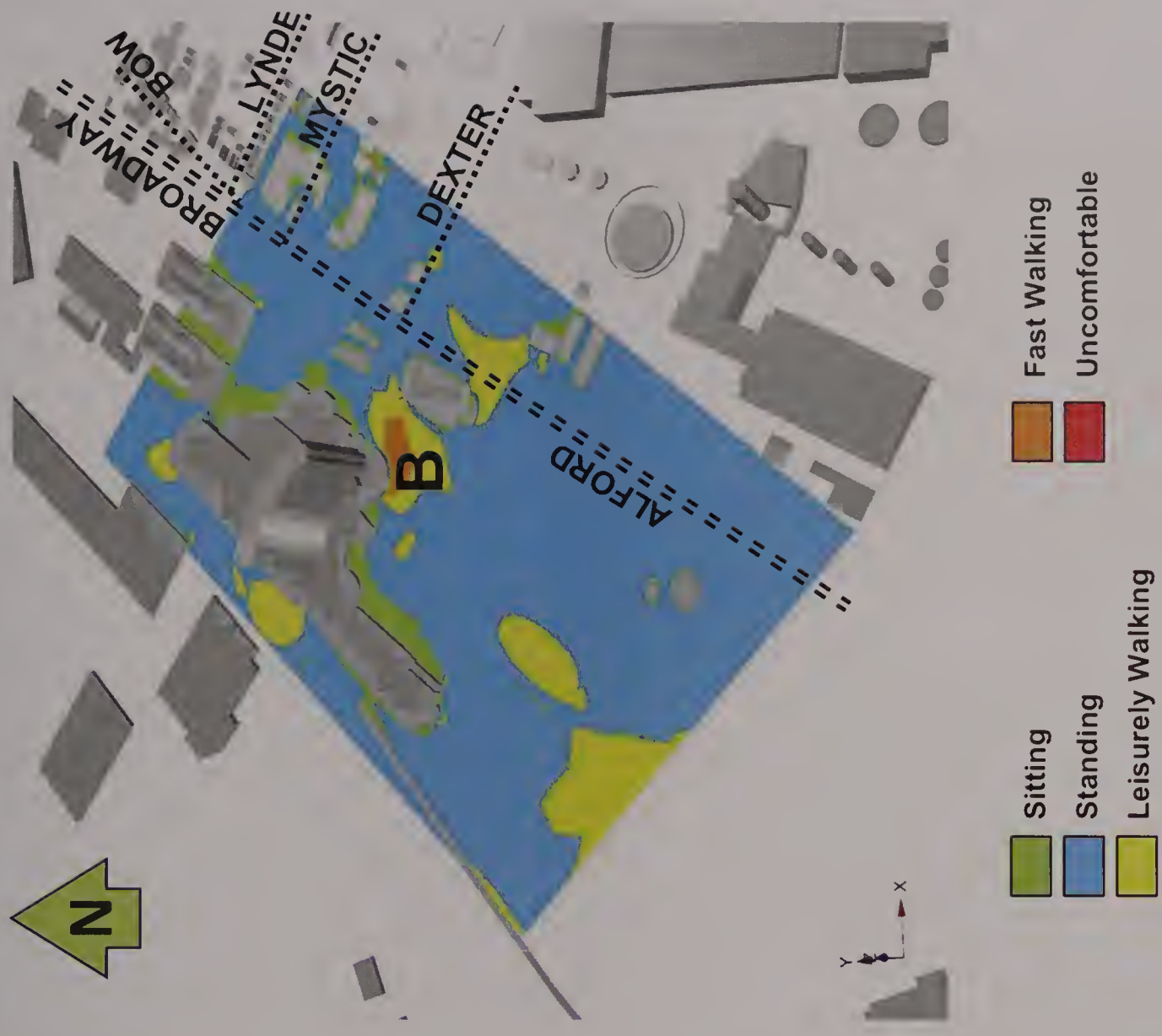
October 23

Wynn Resort in Everett
Everett, Massachusetts

Figure 1-26
Shadow Study for Proposed and Chapter 91 Compliant Projects
Source: ICON Architecture, Inc., 2014



At Grade Conditions - Summer

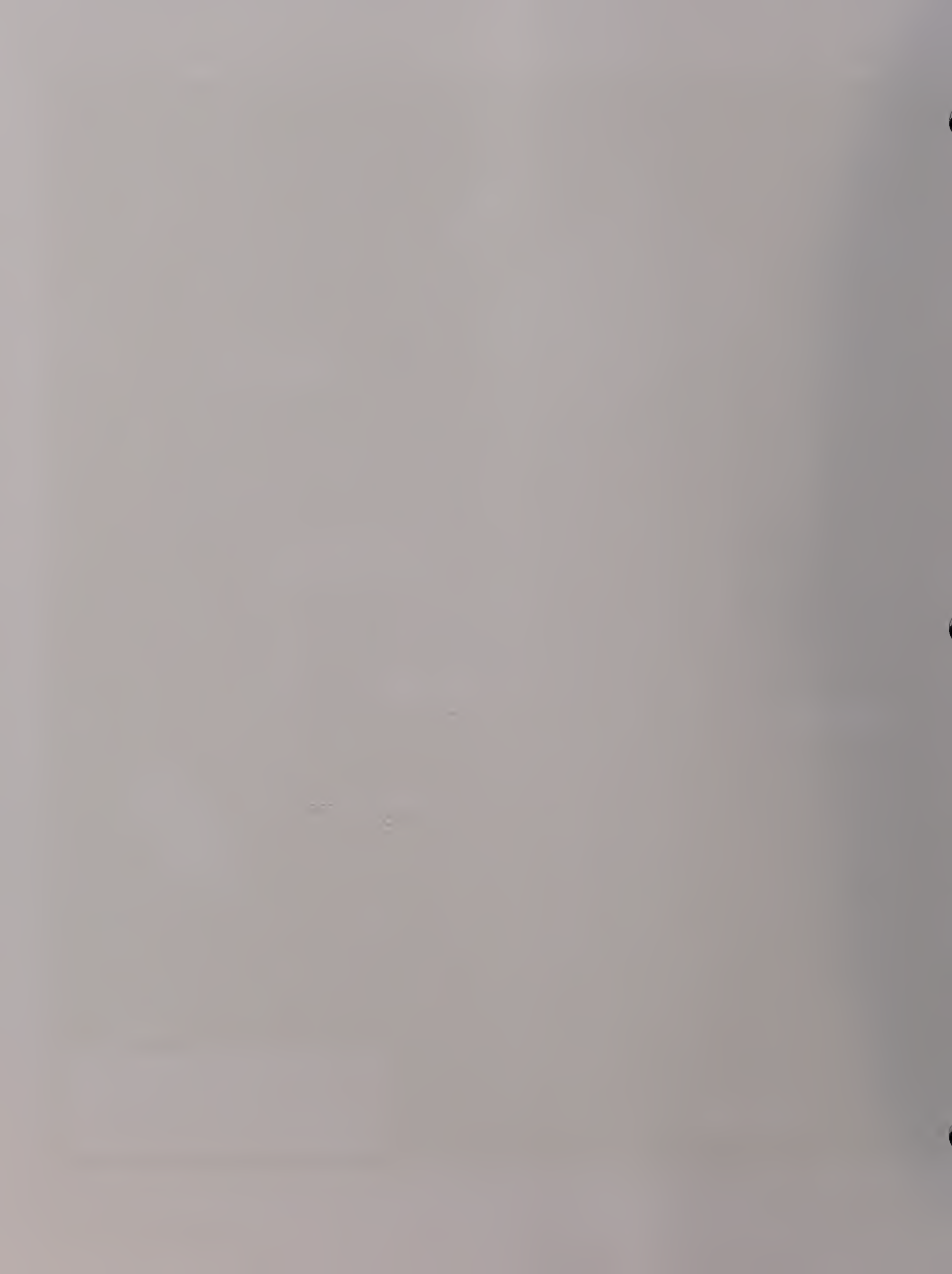


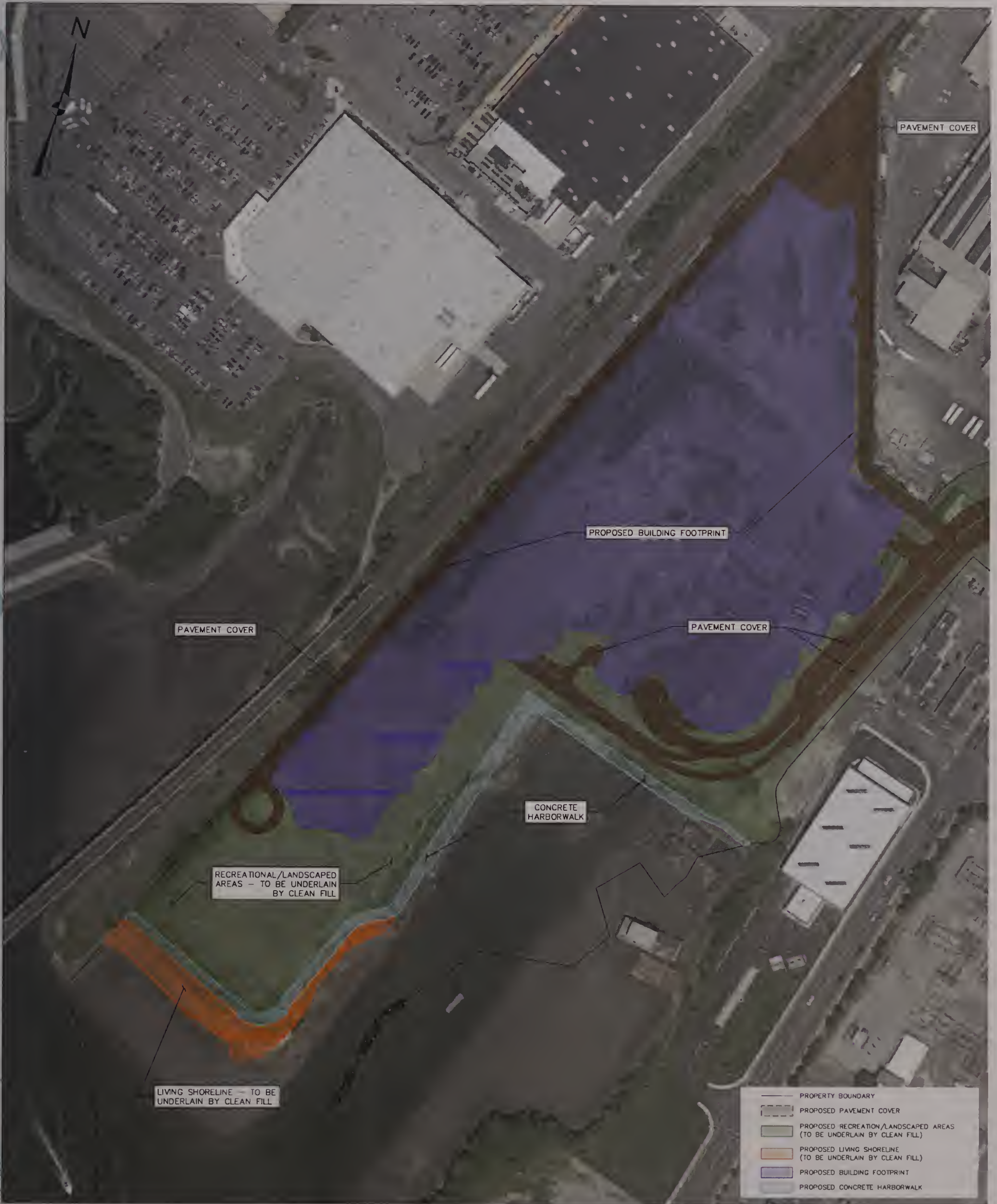
At Grade Conditions - Winter

Wynn Resort in Everett
Everett, Massachusetts

Figure 1-27
Predicted Wind Comfort Zones - Summer and Winter
Source: Novus Environmental, 2014







Chapter 2

TRANSPORTATION

CHAPTER 2: TRANSPORTATION

This chapter presents the comprehensively revised and updated transportation impact assessment for the Project specified in the Secretary's Certificate. It includes revised trip generation, mode share and other traffic and transit analyses closely coordinated with MassDOT since the SFEIR in response to MassDOT's comments on the Proponent's analyses in the FEIR. More specifically these revised analyses, all previously reviewed by MassDOT, include updated and expanded evaluations of potentially affected roads, the identification of improvements to mitigate the impact of Project traffic on those roads, an updated parking evaluation supporting the reduction of the number of spaces in the Project garage, a comprehensive reevaluation of the public and private transit usage of the Project and the further specification of related improvements to public transit infrastructure and the development of private transit options, an updated evaluation of pedestrian and bicycle trips to the Project and related improvements, a Transportation Demand Management ("TDM") plan, and an updated Transportation Monitoring Plan. The extensive consultations with MassDOT relating to these topics are itemized in Section 1.5.1 and the consultations with the BTD on those traffic and transit topics of concern to it are summarized in Section 1.5.2. As is discussed in Section 1.5.3, MassDOT and DCR confirmed that MassDOT would be responsible for post-FEIR coordination regarding DCR's prior comments relating to Project traffic and roadway-related concerns.

2.1 TRIP GENERATION, MODE SHARE AND OTHER TRAFFIC AND TRANSIT ANALYSES SINCE THE FEIR

This section presents the trip generation analysis for the Project as refined, and the associated mode share goals for the Project. The Proponent has established quantitative goals for both patron and employee use of alternatives to single-occupancy vehicles (SOV). To achieve these goals, the Proponent is committed to implementing strong TDM measures to minimize automobile usage, detailed in Section 4.16 of the FEIR as referenced in Section 2.7.

2.1.1 TRIP GENERATION ANALYSIS AS REVISED IN CONSULTATION WITH MASSDOT

The underlying trip generation methodology and travel mode shares are the same as in the FEIR analysis.

2.1.1.1 EVALUATION OF EFFECT OF PROJECT DESIGN REFINEMENTS ON TRIP GENERATION ANALYSIS

The Project design refinements discussed in Section 1.2.2 have slightly affected the outcome of the trip generation analysis.

Table 2-1 identifies the Project design refinements responsible for these slight differences in the outcome of the trip generation analysis.

Table 2-1: Comparison of Project Evaluated in the FEIR and as Refined and Evaluated in the SFEIR

Land Use Component ¹	As Evaluated in FEIR	As Refined and Evaluated in SFEIR	Difference
Hotel	504 rooms	629 rooms	+ 125 rooms
Nightclub	25,341 sf	0 sf	-25,341 sf
Retail	96,172 sf	79,455 sf	-16,717 sf
Gaming	4,160 positions	4,580 positions	+ 420 positions

1) These components are the primary land uses affecting the trip generation analysis. Other elements of the Project (such as spa/gym facilities, restaurants, and conference spaces) generate internal trips and are accounted for in these primary categories.

An on-site parking garage with 3,400 spaces will serve hotel guests, casino patrons, and visitors to the retail shops and restaurants.

Vehicle Trip Comparison

Using the same trip generation analysis methodology documented in the FEIR, the number of vehicle trips generated by the Project design as refined has been estimated. Table 2-2 presents those estimates for the Project evaluated in the FEIR and the Project as refined.

As shown in Table 2-2, the peak hour decrease in estimated vehicle trips associated with retail and nightclub land uses is greater than the increase in estimated vehicle trips associated with hotel rooms and gaming positions. As a result, the Project design as refined generates a lower number of estimated peak hour vehicle trips; 61 fewer vehicle trips in the Friday p.m. peak hour and 143 fewer vehicle trips in the Saturday afternoon peak hour.

This trip generation analysis confirms that the Project design as refined will not result in increased traffic impacts during peak hours.

The estimated number of Saturday daily vehicle trips associated with the Project design as refined is also lower (360 fewer vehicle trips). However, the estimated number of Friday daily trips associated with the Project design as refined is higher (634 more vehicle trips). The revised trip generation estimates are used throughout the remainder of this chapter.

Table 2-2: Comparison of FEIR Project Vehicle Trips and Project Design as Refined and Evaluated in SFEIR Vehicle Trips

Time Period/ Category	Vehicle Trips		Difference	
	Project as Evaluated in FEIR	Project Design as Refined and Evaluated in SFEIR	Vehicle Trips	Percent
Friday Daily (vpd)				
Hotel	1,214	1,538	+324	
Nightclub	840	0	-840	
Retail	3,392	2,998	-394	
Gaming	13,402	14,754	+1,352	+3.3%
<u>All Shuttles and Buses¹</u>	<u>648</u>	<u>840</u>	<u>+192</u>	
Total	19,496	20,130	+634	
Friday p.m. Peak Hour (vph)				
Hotel	65	82	+17	
Nightclub	143	0	-143	
Retail	202	172	-24	
Gaming	975	1,072	+97	-4.3%
<u>All Shuttles and Buses¹</u>	<u>34</u>	<u>26</u>	<u>-8</u>	
Total	1,419	1,358	-61	
Saturday Daily (vpd)				
Hotel	1,334	1,686	+352	
Nightclub	2,108	0	-2,108	
Retail	4,618	4,094	-524	
Gaming	15,614	17,192	+1,578	-1.5%
<u>All Shuttles and Buses¹</u>	<u>668</u>	<u>1,010</u>	<u>+342</u>	
Total	24,342	23,982	-360	
Saturday Afternoon Peak Hour (vph)				
Hotel	85	105	+20	
Nightclub	244	0	-244	
Retail	467	413	-54	
Gaming	1,119	1,232	+113	-7.3%
<u>All Shuttles and Buses¹</u>	<u>38</u>	<u>60</u>	<u>+22</u>	
Total	1,953	1,810	-143	

1) Includes Wynn patron shuttles, Wynn employee shuttles, tour buses, and Premium Park and Ride buses. These vehicles serve riders in all land use categories.

Person Trip Comparison

A summary of the SOV and non-SOV person trip differences between the Project as evaluated in the FEIR and the Project design as refined and evaluated herein is presented in Tables 2-3 through 2-6.

The number of person trips is estimated to decrease in the Friday p.m. peak, Saturday daily, and Saturday peak hour conditions but will increase in the Friday daily condition.

During each time period evaluated, the person trips by travel modes assumed to be used exclusively by gaming patrons (tour bus and Premium Park and Ride (PPR)) are expected to increase as a result of the increased number of gaming positions in the Project design as refined.

Because the Proponent has committed that there will be no employee shift changes during the Friday p.m. peak hour, there will be no Friday p.m. peak hour employee trips.

Table 2-3: SOV and Non-SOV Person Trips by Travel Mode – Project Evaluated in FEIR vs. Project Design as Refined and Evaluated in SFEIR, Friday Daily

Type of Person Trip ¹	Person Trips		Difference	
	Project as Evaluated in FEIR	Project Design as Revised and Evaluated in SFEIR	Person Trips	Percent
SOV				
Private Automobiles	35,532	33,130	+ 598	+ 1.8%
Taxis	3,607	3,716	+ 109	+ 3.0%
Subtotal – SOV person trips	36,139	36,846	+ 707	+ 2.0%
Non-SOV				
Orange Line to Patron Shuttle	4,508	4,616	+ 138	+ 3.0%
Orange Line to Employee Shuttle	1,348	1,354	+ 6	+ 0.4%
Water transportation	2,908	2,992	+ 84	+ 2.8%
MBTA bus	674	678	+ 4	+ 0.4%
Tour bus	3,458	3,808	+ 350	+ 10.2%
Premium Park and Ride	1,240	1,346	+ 106	+ 8.5%
Employee neighborhood shuttle	1,348	1,354	+ 6	+ 0.4%
Walk/bike	202	204	+ 2	+ 0.5%
Subtotal – Non-SOV person trips	15,686	16,382	-696	+ 4.4%
Total	51,825	53,228	+ 1,403	+ 2.7%

1) Includes all patron and employee trips.

Table 2-4: SOV and Non-SOV Person Trips by Travel Mode – Project Evaluated in FEIR vs. Project Design as Refined and Evaluated in SFEIR, Friday p.m. Peak Hour

Type of Person Trip ¹	Person Trips		Difference	
	Project as Evaluated in FEIR	Project Design as Refined and Evaluated in SFEIR	Person Trips	Percent
SOV				
Private Automobiles	2,514	2,391	-123	-4.9%
Taxis	302	293	-9	-3.0%
Subtotal – SOV person trips	2,816	2,684	-132	-4.7%
Non-SOV				
Orange Line to Patron Shuttle	378	366	-12	-3.2%
Orange Line to Employee Shuttle	-	-	-	-
Water transportation	227	220	-7	-3.1%
MBTA bus	-	-	-	-
Tour bus	274	302	+28	+10.2%
Premium Park and Ride	82	91	+9	+9.8%
Employee neighborhood shuttle	-	-	-	-
Walk/bike	-	-	-	-
Subtotal – Non-SOV person trips	961	979	+18	+1.8%
Total	3,777	3,663	-114	-3.0%

1) Includes all patron and employee trips.

Table 2-5: SOV and Non-SOV Person Trips by Travel Mode – Project Evaluated in FEIR vs. Project Design as Refined and Evaluated in SFEIR, Saturday Daily

Type of Person Trip ¹	Person Trips		Difference	
	Project as Evaluated in FEIR	Project Design as Refined and Evaluated in SFEIR	Person Trips	Percent
SOV				
Private Automobiles	41,046	39,514	-1,532	-3.7%
Taxis	4,498	4,416	-82	-1.8%
Subtotal – SOV person trips	45,544	43,930	-1,614	-3.5%
Non-SOV				
Orange Line to Patron Shuttle	5,622	5,520	-102	-1.8%
Orange Line to Employee Shuttle	1,738	1,628	-110	-6.3%
Water transportation	3,632	3,556	-76	-2.1%
MBTA bus	868	814	-54	-6.2%
Tour bus	4,030	4,436	+406	+10.1%
Premium Park and Ride	1,470	1,576	+106	+7.1%
Employee neighborhood shuttle	1,738	1,628	-110	-6.3%
Walk/bike	260	244	-16	-6.2%
Subtotal – Non-SOV person trips	19,358	19,402	+44	+0.2%
Total	64,902	63,332	-1,570	-2.4%

1) Includes all patron and employee trips.

Table 2-6: SOV and Non-SOV Person Trips by Travel Mode – Project Evaluated in FEIR vs. Project Design as Refined and Evaluated in SFEIR, Saturday Afternoon Peak Hour

Type of Person Trip ¹	Person Trips		Difference	
	Project as Evaluated in FEIR	Project Design as Refined and Evaluated in SFEIR	Person Trips	Percent
SOV				
Private Automobiles	3,336	3,037	-299	-9.0%
Taxis	<u>368</u>	<u>347</u>	<u>-21</u>	<u>-5.7%</u>
Subtotal – SOV person trips	3,704	3,384	-320	-8.6%
Non-SOV				
Orange Line to Patron Shuttle	460	433	-27	-5.9%
Orange Line to Employee Shuttle	122	94	-28	-23.8%
Water transportation	294	274	-20	-11.6%
MBTA bus	61	46	-15	-23.0%
Tour bus	313	345	+32	+10.2%
Premium Park and Ride	112	118	+6	+4.5%
Employee neighborhood shuttle	122	94	-28	-23.8%
Walk/bike	<u>18</u>	<u>14</u>	<u>-4</u>	<u>-22.2%</u>
Subtotal – Non-SOV person trips	1,502	1,418	+84	-5.6%
Total	5,206	4,802	-404	-7.8%

1) Includes all patron and employee trips.

2.1.2 MODE SHARE ANALYSIS AS REVISED IN CONSULTATION WITH MASSDOT

In its comments on the FEIR, MassDOT requested that the Project travel mode share analysis be presented in the format specified in this section. For purposes of this analysis and the discussion of alternative transportation and mode share Project goals in Section 2.1.2.1, SOV refers to a private automobile carrying one or more persons or a taxicab with one or more passengers. Non-SOV refers to a train, bus, or boat, or a pedestrian or bicycle trip.

A summary of the travel mode shares used in the evaluations presented in this chapter is presented in Table 2-7. MassDOT has approved the use of these travel mode shares.

Table 2-7: Travel Mode Shares

Travel Mode	Casino Patrons	Other Project Patrons	Employees
SOV			
Private Automobile			
Park on-site	63%	76%	0%
Park off-site, connect to employee shuttle	0%	0%	41% ¹⁾
Taxicab	8%	8%	0%
Subtotal – SOV	71%	84%	41%
Non-SOV			
Orange Line to Wynn Patron Shuttle	10% ²⁾	10% ²⁾	0%
Orange Line to Wynn Employee Shuttle	0%	0%	20%
Water Transportation	6%	6%	3%
MBTA Bus	0%	0%	10%
Tour Bus	10%	0%	0%
Premium Park and Ride	3%	0%	3%
Wynn Employee Neighborhood Shuttle	0%	0%	20%
Walk/Bicycle	0%	0%	3%
Subtotal – Non SOV	29%	16%	59%
TOTAL	100%	100%	100%

1) Because employees (except a limited number of Wynn executives and employees with disabilities) who choose to drive to work will be required to park at one of the off-site parking facilities and take an employee shuttle from that facility to the Project, 100% of employees (other than a limited number of Wynn executives and employees with disabilities) will arrive at the Project Site via non-SOV modes. However, including the segment of each employee trip in an SOV, 41% of employee trips will involve SOV modes and 59% will be exclusively via non-SOV modes.

The estimated vehicle trips by travel mode by time period for the Project design as refined are presented in Table 2-8. Non-SOV vehicles trips include trips by the Wynn patron shuttle buses to and from the Orange Line, Wynn employee shuttle buses to and from the Orange Line, Wynn employee shuttle buses to and from remote parking facilities in Medford, Malden, and Everett, the Wynn employee neighborhood shuttle buses, tour buses, PPR buses, and pedestrian and bicycle trips.

Table 2-8: SOV and Non-SOV Vehicle Trips

Time Period/ Direction of Travel	SOV Vehicle Trips	Non-SOV Vehicle Trips
Friday Daily		
In	9,645	420
Out	<u>9,645</u>	<u>420</u>
Total	19,290	840
Saturday Daily		
In	11,486	505
Out	<u>11,486</u>	<u>505</u>
Total	22,972	1,010
Friday p.m. peak hour		
In	673	13
Out	<u>659</u>	<u>13</u>
Total	1,332	26
Saturday afternoon peak hour		
In	896	30
Out	<u>860</u>	<u>30</u>
Total	1,756	60

The peak hour SOV and non-SOV trips tabulated in Table 2-8 were added to the total vehicle trips associated with the No Build (2023) condition¹ to determine the Build conditions used in this chapter. Detailed trip generation worksheets for Project design as refined are in Appendix B.

2.1.2.1 ALTERNATIVE TRANSPORTATION AND MODE SHARE PROJECT GOALS

The transportation impact assessments in this chapter are based on travel mode shares – the percentage of person trips assigned to each of the available travel modes serving the Project Site – that have been used to establish quantitative non-SOV goals for both Project patrons and employees. MassDOT has concurred with both the methodology used to develop these travel mode shares and the resulting alternative travel mode goals. To achieve these goals, the Proponent is committed to implementing strong TDM measures described in detail in Section 4.16 of the FEIR and summarized in Section 2.7. A robust transportation monitoring and reporting program, as described in the FEIR and updated in Section 2.7, will evaluate and reinforce employee and patron travel behavior consistent with the alternative travel mode goals.

¹ To reflect No Build (2023) conditions, a background growth rate of 0.5% was applied over nine years, and traffic from nearby development projects was added to the network.

In response to a MassDOT request, this section presents the projected number of Project person trips in a format different than that of the FEIR, showing person trips by single occupancy vehicle (SOV) and non-SOV vehicle. Table 2-9 and Table 2-10 summarize the estimated SOV and non-SOV person trips segregating casino patrons, other Project visitors, and employee person trips for both the Friday and Saturday daily conditions. Table 2-11 and Table 2-12 summarize the same estimated SOV and non-SOV person trips for both the Friday p.m. and Saturday afternoon peak hour conditions.

Based on the travel mode shares approved by MassDOT, 71% of casino patron person trips are expected to be by SOV modes and 29% are expected to be by non-SOV modes. Based on the same MassDOT approved mode shares, 84% of all other Project patron person trips are expected to be by SOV modes and 16% are expected to be by non-SOV modes. The reason the percentage of casino patron person trips by SOV modes is expected to be lower than the percentage of other Project patron person trips by SOV modes, is that casino patrons will have more attractive non-SOV options, such as tour buses and the Project's PPR service.

Because, as is discussed previously, employees (except a limited number of Wynn executives and employees with disabilities) who choose to drive must park at one of the off-site employee parking facilities, 100% of employees (except a limited number of Wynn executives and employees with disabilities) will arrive at the Project Site via non-SOV modes but 41% of employee person trips will include an SOV trip segment, and 59% of employee person trips will be exclusively by non-SOV modes.

The Project's alternative travel mode goals are based on these person trip mode estimates. For employees, the Proponent has set a goal of no more than 41% of employee trips by SOV. For casino patrons, the SOV goal is no more than 71% of trips.

Table 2-9: SOV and Non-SOV Person Trips by Travel Mode – Friday Daily Conditions

Type of Person Trip	Casino Patrons		Other Project Patrons		Employees		Total – Patrons and Employees	
	person trips	travel mode share	person trips	travel mode share	person trips	travel mode share	person trips	travel mode share
SOV								
Private Automobiles	23,990	63%	6,364	76%	2,776	41% ²⁾	33,130	62%
Taxicab	3,046	8%	670	8%	0	0%	3,716	7%
Subtotal – SOV	27,036	71%	7,034	84%	2,776	41%	36,846	69%
Non-SOV¹⁾								
Orange Line to Wynn Patron Shuttle	3,808	10%	838	10%	0	0%	4,646	9%
Orange Line to Wynn Employee Shuttle	0	0%	0	0%	1,354	20%	1,354	3%
Water Transportation	2,264	6%	504	6%	204	3%	2,992	6%
MBTA Bus	0	0%	0	0%	678	10%	678	1%
Tour Bus	3,808	10%	0	0%	0	0%	3,808	7%
Premium Park and Ride	1,142	3%	0	0%	204	3%	1,346	2%
Employee Neighborhood Shuttle	0	0%	0	0%	1,354	20%	1,354	3%
Walk/Bike	0	0%	0	0%	204	3%	204	<1%
Subtotal – Non-SOV	11,042	29%	1,342	16%	3,998	59%	16,382	31%
TOTAL	38,078	100%	8,376	100%	6,774	100%	53,228	100%

Table 2-10: SOV and Non-SOV Person Trips by Travel Mode – Saturday Daily Conditions

Type of Person Trip	Casino Patrons		Other Project Patrons		Employees		Total – Patrons and Employees	
	person trips	travel mode share	person trips	travel mode share	person trips	travel mode share	person trips	travel mode share
SOV								
Private Automobiles	27,952	63%	8,226	76%	3,336	41% ²⁾	39,514	62%
Taxicab	3,550	8%	866	8%	0	0%	4,416	7%
Subtotal – SOV	31,502	71%	9,092	84%	3,336	41%	43,930	69%
Non-SOV								
Orange Line to Wynn Patron Shuttle	4,436	10%	1,084	10%	0	0%	5,520	9%
Orange Line to Wynn Employee Shuttle	0	0%	0	0%	1,628	20%	1,628	3%
Water Transportation	2,602	6%	710	6%	244	3%	3,556	6%
MBTA Bus	0	0%	0	0%	814	10%	814	1%
Tour Bus	4,436	10%	0	0%	0	0%	4,436	7%
Premium Park and Ride	1,332	3%	0	0%	244	3%	1,576	2%
Employee Neighborhood Shuttle	0	0%	0	0%	1,628	20%	1,628	3%
Walk/Bike	0	0%	0	0%	244	3%	244	<1%
Subtotal – Non-SOV	12,806	29%	1,794	16%	4,802	59%	19,202	31%
TOTAL	44,308	100%	10,886	100%	8,138	100%	63,332	100%

Table 2-11: SOV and Non-SOV Person Trips by Travel Mode – Friday p.m. Peak Hour Conditions

Type of Person Trip	Casino Patrons		Other Project Patrons		Employees ¹⁾		Total – Patrons and Employees	
	person trips	travel mode share	person trips	travel mode share	person trips	travel mode share	person trips	travel mode share
SOV								
Private Automobiles	1,900	63%	491	76%	0	-	2,391	65%
Taxicab	241	8%	52	8%	0	-	293	8%
Subtotal – SOV	2,141	71%	543	84%	0	-	2,684	73%
Non-SOV								
Orange Line to Wynn Patron Shuttle	302	10%	64	10%	0	-	366	10%
Orange Line to Wynn Employee Shuttle	0	0%	0	0%	0	-	0	0%
Water Transportation	181	6%	39	6%	0	-	220	6%
MBTA Bus	0	0%	0	0%	0	-	0	0%
Tour Bus	302	10%	0	0%	0	-	302	8%
Premium Park and Ride	91	3%	0	0%	0	-	91	2%
Employee Neighborhood Shuttle	0	0%	0	0%	0	-	0	0%
Walk/Bike	0	0%	0	0%	0	-	0	0%
Subtotal – Non-SOV	876	29%	103	16%	0	-	979	27%
TOTAL	3,017	100%	646	100%	0	-	3,663	100%

1) Employee shifts will be set so that there is no travel required during the Friday p.m. peak period of 4:30-6:00 p.m.

Table 2-12: SOV and Non-SOV Person Trips by Travel Mode – Saturday Afternoon Peak Hour Conditions

Type of Person Trip	Casino Patrons		Other Project Patrons		Employees		Total – Patrons and Employees	
	person trips	travel mode share	person trips	travel mode share	person trips	travel mode share	person trips	travel mode share
SOV								
Private Automobiles	2,171	63%	674	76%	192	41% ²⁾	3,037	63%
Taxicab	275	8%	72	8%	0	0%	347	7%
Subtotal – SOV	2,446	71%	746	84%	192	41%	3,384	70%
Non-SOV								
Orange Line to Wynn Patron Shuttle	345	10%	88	10%	0	0%	433	9%
Orange Line to Wynn Employee Shuttle	0	0%	0	0%	94	20%	94	2%
Water Transportation	207	6%	53	6%	14	3%	274	6%
MBTA Bus	0	0%	0	0%	46	10%	46	1%
Tour Bus	345	10%	0	0%	0	0%	345	7%
Premium Park and Ride	104	3%	0	0%	14	3%	118	2%
Employee Neighborhood Shuttle	0	0%	0	0%	94	20%	94	2%
Walk/Bike	0	0%	0	0%	14	3%	14	< 1%
Subtotal – Non-SOV	1,001	29%	141	16%	276	59%	1,418	30%
TOTAL	3,447	100%	887	100%	468	100%	4,802	100%

2.1.3 OTHER ANALYSES REVISED IN CONSULTATION WITH MASSDOT

The Proponent has reanalyzed (a) the current Level of Service (“LOS”) on the potentially affected roads in the Study Area, as defined in Section 2.1.3.2 below; (b) the anticipated LOS on potentially affected roads in the Study Area in the future without the Project (the No Build Condition); (c) the anticipated LOS on potentially affected roads in the Study Area with the Project (the Build Condition); and (d) the anticipated LOS on potentially affected roads in the Study Area with the Project and the traffic mitigation measures the Proponent proposes (the Build with Mitigation Condition).

These analyses were conducted using three different state-of-the-art computer simulation programs described below, two of which were used for the analyses in the FEIR and a third suggested by MassDOT after the FEIR. MassDOT reviewed the Proponent’s methodologies for these analyses, as well as the results of these analyses, and MassDOT and the Proponent agree on the conclusions of those analyses.

The FEIR relied on Trafficware’s Synchro (version 8) software package to calculate the average delay and associated LOS on potentially affected roads in the Study Area. The Synchro software is based on the traffic operational analysis methodology of the Transportation Research Board’s (TRB’s) *2000 Highway Capacity Manual (HCM)*, which is the methodology prescribed by MassDOT for the analysis of signalized and unsignalized intersections.

For roundabouts and rotaries, the MassDOT-prescribed software is SIDRA, a software package first released in 1984 for evaluating intersection and network capacity and LOS. SIDRA is a micro-analytical traffic evaluation tool that employs lane-by-lane and vehicle drive cycle models. It employs a combined (hybrid) geometry and gap-acceptance modeling approach in order to take into account the effect of roundabout geometry on driver behavior directly through gap-acceptance modeling. SIDRA was utilized by the Proponent in the FEIR.

A third type of microsimulation software is VISSIM. VISSIM provides both a visual and analytical representation of traffic. It is typically used to model complex geometric configurations at signalized intersections to supplement other software models like Synchro.

At the request of MassDOT, the Proponent reevaluated several key intersections in the Study Area using VISSIM. The VISSIM model was adjusted based on MassDOT input to reflect current volumes and queues in the intersections reevaluated, and to consider refinements to the mitigation measures evaluated for those intersections.

In July 2014, the Proponent provided MassDOT the electronic files of the Build with Mitigation Conditions VISSIM models. The Proponent had previously provided the Existing Conditions VISSIM models to MassDOT. The Proponent and MassDOT then collaborated on further refinements of the VISSIM models. MassDOT has expressed its satisfaction with the models as refined.

Section 2.1.3.2 describes the VISSIM simulation methodology as refined by the Proponent in collaboration with MassDOT.

2.1.3.1 CAPACITY ANALYSIS AND QUEUE METHODOLOGIES

Synchro and SimTraffic

As indicated in Section 2.1.3, the criterion for evaluating traffic operations is LOS which is determined by assessing average delay incurred by vehicles at intersections and along intersection approaches.

To determine whether a Project impact on a potentially affected road will be effectively mitigated, the Proponent compared the LOS for the No Build (2023) and Build with Mitigation conditions. If the overall LOS in the Build with Mitigation Conditions is the same as or better than in the No Build condition, the Project's impacts on that potentially affected road are considered to be effectively mitigated consistent with the procedures outlined in the Institute of Transportation Engineers' (ITE's) *Transportation Impact Analyses for Site Development*.² The volume-to-capacity ("v/c") ratio is a measure of congestion at an intersection approach. A v/c ratio of one or greater indicates that the traffic volume on the intersection approach exceeds capacity.

LOS designations are based on the average delay per vehicle for all vehicles entering an intersection. Table 2-13 displays the intersection level of service criteria. LOS A indicates the most favorable condition, with minimum traffic delay, while LOS F represents the condition with the most significant traffic delay. LOS D or better is typically considered acceptable in an urban area.³ However, LOS E or F is often typical for a stop-controlled minor street that intersects a major roadway.

² Institute of Transportation Engineers, *Transportation Impact Analyses for Site Development* (Washington D.C., 2005).

³ MassDOT, *Traffic Impact Assessment Guidelines*, March 13, 2014.

Table 2-13: Intersection Level of Service (LOS) Criteria

Level of Service (LOS)	Average Stopped Delay (seconds/vehicle)	
	Signalized Intersection	Unsignalized Intersection
A	≤ 10	≤ 10
B	> 10 and ≤ 20	> 10 and ≤ 15
C	> 20 and ≤ 35	> 15 and ≤ 25
D	> 35 and ≤ 55	> 25 and ≤ 35
E	> 55 and ≤ 80	> 35 and ≤ 50
F	> 80	> 50

Source: *Highway Capacity Manual*, Transportation Research Board, 2010.

SimTraffic is companion software to Synchro. It provides a microsimulation of traffic, allowing the generation of reports of the simulations runs, including queue lengths over time. During the Proponent's post-FEIR consultation with MassDOT, MassDOT requested that the Proponent use SimTraffic, rather than Synchro, to determine vehicle queue lengths in the Study Area. Accordingly the Proponent has used SimTraffic simulation to generate 50th and 95th percentile queues for each signalized location in the Study Area. The results have been provided to and reviewed by MassDOT.

The 50th percentile queue length, measured in feet, represents the average extent of the vehicle queue (to the last stopped vehicle) from the stop line during 50% of all signal cycles. The 50th percentile queue will be seen during most cycles. The queue would be this long about 50% of the time, typically during off-peak hours.

The 95th percentile queue length, measured in feet, represents the farthest extent of the vehicle queue (to the last stopped vehicle) from the stop line during the 5% of signal cycles with the longest queues. The 95th percentile queue will not be seen during most cycles. In other words, the queue would be this long only 5% of the time, typically during peak hours.

To generate the SimTraffic queue outputs, the program seeded the network for a total of 15 minutes, and simulated the network for a one-hour duration, per MassDOT's *A Guide on Traffic Analysis Tools*, updated October 5, 2012. For the current analyses, each simulation was run five times. The averages of the five runs for both 50th and 95th percentile queues are reported in the capacity analysis summary tables in Section 2.2. The simulated available queue storage for each lane group is also provided in these tables.

2.1.3.2 VISSIM MODELING AND ANALYSIS

The following describes the development of the Project VISSIM models presented in this chapter.

Study Area Definition

The VISSIM models developed in consultation with MassDOT include the following locations:

- Lower Broadway/Alford Street (Route 99), Everett/Boston;
- Santilli Circle, Everett;
- Sweetser Circle, Everett;
- Wellington Circle, Medford; and
- Sullivan Square, including the intersection of Cambridge Street at the I-93 Northbound off-ramp, Charlestown.

Data Collection

The VISSIM model requires extensive data including:

- Roadway geometry (number of lanes, turning lane lengths, and roadway curvature);
- Traffic signal controls (signage and traffic signal information);
- Traffic volumes;
- Origin-Destination data; and
- Queue length observations.

The data used to develop the VISSIM model were the same as the data used in the transportation analyses presented in the FEIR, supplemented by new traffic counts as requested by BTM and collected in December 2014. Additional field observations were conducted at locations where count data were updated in order to collect up-to-date queue data.

Base Model Development

The following methodology was used to develop the base VISSIM model for the Project and reviewed with MassDOT.

Roadway Links

All roadway links throughout the Study Area were coded based on the observed geometries at the intersections and along the roadways. This input included the number of lanes, distance between intersections, lane widths, and lengths of turning lanes.

Vehicular Inputs

The Friday p.m. “real” peak hour traffic volumes for the Project were used to develop the base models. The entire Study Area is urban in nature, and vehicles exhibit similar characteristics throughout the Study Area. Characteristics of the vehicular inputs such as heavy vehicle percentages and desired free flow travel speeds were assumed to be consistent throughout the Study Area. It was assumed that vehicles entering the network will have a desired free flow speed between 30 and 36 miles per hour (mph). In the Study Area, heavy vehicle percentages are relatively low during the peak hours. Accordingly it was assumed that heavy vehicles represent approximately two percent (2%) of the overall traffic volumes throughout the Study Area.

Vehicle Routing Decisions

The specific paths and turning movements of vehicles at the intersections from the FEIR were incorporated into the VISSIM model. The vehicle routing decisions define a specific path between an origin and destination for each vehicle that crosses a decision point.

Desired Speed Decisions/Reduced Speed Areas

Some areas of the Study Area have slower travel speeds than the overall desired free flow speed. These areas must be coded to accurately model vehicle travel speeds throughout these areas. Reduced speed areas are a feature in VISSIM used for turning movements and for other areas where vehicles must travel at lower speeds. Based on field observations at Sweetser Circle and Sullivan Square, a travel speed of approximately 15 mph was used to model vehicles entering and exiting Sweetser Circle and Sullivan Square.

Priority Rules/Vehicle Conflict Areas

Priority rules and conflict areas are a feature of the VISSIM model that must be coded to prevent vehicles from traveling through each other. Conflict areas are defined spaces that occur where two roadway links within the model overlap. Priority rules are similar to conflict areas but can be programmed anywhere within the model, even if two separate roadway links do not overlap. A combination of the priority rules and conflict areas were used to establish the base models. Both of these features include other parameters that define acceptable gaps, headways, and safety factors. These parameters were used to calibrate the VISSIM models accurately. Generally, the conflict areas were used to define crossing vehicular paths. Priority rules were used where conflict areas, in the experience of the modeler, were not sufficient to model the conditions to represent observed conditions. Priority rules were used to code some approaches at Sweetser Circle, Santilli Circle, and Sullivan Square to reflect accurately the queues along the approaches and the vehicle interactions at the merge points.

Traffic Control Devices

Stop signs and traffic signals were added to the model to reflect traffic control throughout the Study Area. Traffic signal timing/phasing plans and the traffic analyses presented in the FEIR were used as the basis to code the traffic signals in the VISSIM model.

Calibration/Validation of Base Model

The VISSIM model is calibrated to existing conditions by running the base model and reviewing the visual representation of the model and the statistical output from the model. The visual review can help identify where simulated congestion may be too light or too heavy in the model. The statistical output generally consists of observed traffic volumes, vehicular delays, and vehicular queuing at the Study Area intersections. The model outputs should closely match the existing conditions observed in the field.

As discussed above, priority rules were used at Sweetser Circle, Santilli Circle, and Sullivan Square to accurately calibrate the queues along each of the approaches. Several iterations of the base models were run until the statistical and visual outputs from the models closely resembled the existing conditions scenario. The base models were calibrated to match the existing volumes and observed queuing throughout the Study Area. For these models, heavy congestion is experienced along several

approaches to intersections throughout the study area such as the Main Street approach to Sullivan Square; the I-93 Northbound off-ramp approach to Cambridge Street; the Fellsway (Route 28) northbound approach to Wellington Circle, and the Revere Beach Parkway (Route 16) westbound approach to Wellington Circle. The existing conditions models were reviewed by MassDOT prior to and concurrent with the development and calibration of the base models for the future conditions scenarios.

Development of Alternatives

After the base models are calibrated to existing conditions, different geometric configurations and improvements at the intersections and along the roadways can be evaluated. In consultation with MassDOT, modifications were made to the base models to reflect refinements to mitigation designs. The mitigation measures evaluated were integrated into the VISSIM model using the same methodology and parameters as those used to develop the base models in order to provide the most realistic and accurate representation of the mitigation measures evaluated. The alternatives were evaluated using Friday p.m. "real" peak hour traffic volumes as revised to reflect the Project design as refined. All of these evaluations were reviewed by MassDOT.

Analysis of Alternatives

After the VISSIM model was coded for the future conditions with the proposed mitigation, multiple runs of the VISSIM model were conducted to collect the output. A total of five simulation runs were conducted, and the measures of effectiveness ("MOEs") were calculated. The MOEs and other output obtained from the model include traffic volumes, average delays, and average queues at the Study Area intersections. The detailed results from the five runs were averaged and are provided in Appendix B. A summary table of the results of the Synchro analysis is also provided in Appendix B.

The results of the VISSIM simulations, all of which have been the subject of consultation with MassDOT, are discussed in Appendix B.

2.2 EVALUATIONS OF STUDY AREA IMPACTS AND MITIGATION SINCE FEIR

Based on comments received on the SFEIR (including a request by MassDOT, the MBTA, and BTD to add the intersection of Cambridge Street/Spice Street/MBTA Busway to the Study Area), and the Secretary's Certificate, the impacts of the Project on the following

intersections within the Study Area were reevaluated (the identifying numbers correspond to the numbering system used in the FEIR for ease of comparison). As requested by the City of Boston, MassDOT, and the MBTA, the locations of these Study Area intersections are shown in Figure 2-1.

1. Horizon Way/Broadway (Route 99), Everett (in future, Project primary driveway, combined with location 2);
7. Beacham Street/Broadway (Route 99), Everett (in future, Project service driveway);
8. Bowdoin Street/Broadway (Route 99), Everett;
10. Revere Beach Parkway (Route 16)/Santilli Highway/Mystic View Road/Route 99 Connector (Santilli Circle), Everett;
11. Revere Beach Parkway (Route 16)/Broadway (Route 99)/Main Street (Sweetser Circle), Everett;
28. Revere Beach Parkway (Route 16)/Union Street, Chelsea;
29. Revere Beach Parkway (Route 16)/Washington Avenue, Chelsea;
30. Revere Beach Parkway (Route 16)/Webster Avenue, Chelsea;
32. Beach Street/Everett Street/Route 1A/Route 16/Route 60 (Bell Circle), Revere;
38. Mystic Valley Parkway (Route 16)/Mystic Street (Route 38), Medford;
39. Mystic Valley Parkway (Route 16)/Route 16 Southbound Connector, Medford;
42. Mystic Valley/Revere Beach Parkway (Route 16)/Fellsway (Route 28)/Middlesex Avenue (Wellington Circle), Medford;
51. Dexter Street/Alford Street (Route 99), Boston;
52. Cambridge Street/I-93 Northbound Off-ramp, Boston;
53. Main Street/Maffa Way/Cambridge Street/Alford Street (Sullivan Square), Boston;
54. Rutherford Avenue/Austin Street, Boston;
55. Rutherford Avenue/Route 1 Connector, Boston;
56. Rutherford Avenue/I-93 Ramps/Chelsea Street (City Square), Boston; and
58. Cambridge Street/Spice Street/MBTA Busway, Boston.

2.2.1 LOWER BROADWAY/ALFORD STREET (ROUTE 99), EVERETT/BOSTON

The Lower Broadway/Alford Street (Route 99) area includes the intersection of the main entrance to the Project with Broadway (Route 99) in Everett. The following intersections are located in the Lower Broadway/Alford Street (Route 99) area (the identifying numbers correspond to the numbering system used in the FEIR for ease of comparison):

1. Horizon Way/Broadway (Route 99), Everett (intersection with Project main entrance);
7. Beacham Street/Broadway (Route 99), Everett (intersection with Project service road);
8. Bowdoin Street/Broadway (Route 99), Everett; and
51. Dexter Street/Alford Street (Route 99), Boston.

Because the city boundary between the City of Everett and the City of Boston is located between Intersection 1, Horizon Way/Broadway (Route 99) in Everett, and Intersection 51, Dexter Street/Alford Street (Route 99), the analyses of the Dexter Street/Alford Street (Route 99) intersection are included in this section. The Alford Street Bridge construction in this area was substantially completed in the fall of 2014, and all lanes of the bridge were reopened in both directions. In addition, the removal of the toll plaza on the Tobin Bridge (Route 1) was completed since the FEIR, and all three travel lanes on both levels of that bridge were reopened. As a result of these developments since the FEIR, BTD requested that new turning movement counts be collected at the intersections along Broadway/Alford Street (Route 99) in the cities of Everett and Boston. This was done on Friday, December 5, and Saturday, December 6, 2014 and the resulting data has been used in place of the data collected in June 2013 and evaluated in the FEIR. In general, the data collected in December 2014 were an average of 12.7% higher for the Friday p.m. peak hour and an average of 14.7% higher for the Saturday afternoon peak hour.

A seasonal adjustment of 0.97, obtained from MassDOT's *Weekday Seasonal Factors Report*, was applied to the December 2014 data, and to reflect No Build (2023) conditions, a background growth rate of 0.5% was applied over nine years, and traffic from nearby development projects was added. Volume diagrams for the Existing (2014) Friday p.m. and Saturday afternoon peak hours are shown in Figure 2-2 and Figure 2-3. The No Build (2023) Friday p.m. and Saturday afternoon peak hour volumes are shown in Figure 2-4 and Figure 2-5. The Project-generated trips for the Friday p.m. peak hour are shown in Figure 2-6, and those for the Saturday afternoon peak hour are shown in Figure 2-7. The Friday p.m. "real" peak hour

project-generated trips are shown in Figure 2-8.⁴ The Build (2023) Friday p.m. and Saturday afternoon peak hour volumes are shown in Figure 2-9 and Figure 2-10. The Build (2023) Friday p.m. “real” peak hour volumes are shown in Figure 2-11.

2.2.1.1 MITIGATION

The main and service entrances to the Project Site are located on Lower Broadway (Route 99). Therefore, the Proponent proposes significant improvements to Lower Broadway/Alford Street (Route 99) that, according to the evaluations in this SFEIR, will improve traffic conditions in this area. Lower Broadway/Alford Street (Route 99) will be reconstructed between Revere Beach Parkway (Route 16) and the Project main entrance using a “Complete Streets” design to provide a general four-lane cross-section (two travel lanes per direction) with additional turning lanes provided at major intersections, sidewalks along both sides, bicycle lanes, and enhanced and relocated MBTA bus stops pursuant to plans developed in consultation with the MBTA to improve overall access and spacing of stops and locate them on the far sides of intersections reflecting the MBTA’s preference. The proposed design for Lower Broadway/Alford Street (Route 99) is shown in Figure 2-12A, Figure 2-12B, and Figure 2-12C.

The Proponent will also work with the MBTA to implement local bus priority on Broadway (Route 99). The proposed locations of MBTA bus stops along Broadway/Alford Street (Route 99) are shown in Figure 2-13A and Figure 2-13B. A landscaped median and street trees will be provided where sufficient right-of-way is afforded. Existing traffic signals along the corridor will be reconstructed to include ornamental (period) poles, mast arms, lighting and appurtenances, and will include pedestrian and bicycle accommodations.

In order to improve intersection operations, the signalized intersections along Lower Broadway/Alford Street (Route 99) will be coordinated and the offsets will be optimized. By extending the cycle lengths to 120 seconds and adjusting the phasing splits, the operations at Beacham Street/Broadway (Route 99) and Bowdoin Street/Broadway (Route 99) will be improved. The proposed traffic signal phasing and timing will incorporate pedestrian phasing to ensure that pedestrians can cross Broadway (Route 99) safely. The installation of left-turn lanes on Broadway (Route 99) at both Beacham Street and Bowdoin Street will also improve operations.

⁴ The definition of the “real” peak hour can be found in Section 4.6.2 of the FEIR.

The Proponent will continue to collaborate with the cities of Everett and Boston, MassDOT, and the MBTA as the design of the Lower Broadway/Alford Street (Route 99) mitigation continues.

2.2.1.2 TRAFFIC ANALYSIS

The analyses described in Section 2.1.3 show that the proposed improvements described in Section 2.2.1.1 will effectively mitigate the impacts of Project traffic on Broadway/Alford Street (Route 99) as described in further detail below and previously shared with MassDOT and the MBTA during post-FEIR consultation. Capacity analysis summary tables (“CASTs”) for all conditions during the Friday p.m., Saturday afternoon, and Friday p.m. “real” peak hours are provided in Table 2-14, Table 2-15, and Table 2-16, respectively. Synchro and VISSIM output can be found in Appendix B.

1. Project Main Entrance/Mystic Street/Broadway (Route 99)

The intersection of the Project’s Main Entrance/Mystic Street/Broadway (Route 99) was analyzed only in the Build (2023) Condition and the Build (2023) Condition with mitigation because the intersection does not exist in either the Existing (2013) or No-Build (2023) Conditions. Because the Build (2023) Condition includes most of the improvements discussed in Section 2.2.1.1, the only difference between the Build (2023) and Build (2023) Condition with Mitigation at this intersection is traffic signal coordination.

The analysis shows that, in all three peak hours analyzed, this intersection in the Build (2023) Condition with Mitigation will operate at an overall LOS C or better, demonstrating that the improvements discussed in Section 2.2.1.1 effectively mitigate the Project’s traffic at this intersection. Both the 50th and 95th percentile queues will be accommodated by the available queue storage.

7. Beacham Street/Broadway (Route 99)

The intersection of Beacham Street and Broadway was analyzed in the No-Build, Build (2023), and Build (2023) with Mitigation Conditions. That analysis shows that the intersection of Beacham Street/Broadway (Route 99) will operate at LOS F in the No Build Condition during the Friday p.m. peak hour and LOS D in the No Build Condition during the Saturday afternoon peak hour. As a result of the improvements discussed in Section 2.2.1.1, including the addition of left-turn lanes on Broadway (Route 99) northbound and southbound, the analysis shows that the intersection will operate at LOS D in the Build (2023) Condition with

Mitigation during the Friday p.m. peak hour, Friday p.m. “real” peak hour, and Saturday afternoon peak hour, demonstrating that the improvements discussed in Section 2.2.1.1 effectively mitigate the Project’s traffic at this intersection.

8. Bowdoin Street/Broadway (Route 99)

The intersection of Bowdoin Street and Broadway (Route 99) was analyzed in the No Build (2023), Build (2023), and Build (2023) with Mitigation Conditions. That analysis shows that this intersection will operate at LOS B in the No Build Condition during the Friday p.m. and the Friday p.m. “real” peak hours, and LOS A during the Saturday afternoon peak hour. As a result of the improvements discussed in Section 2.2.1.1, including the addition of a left-turn lane on the Broadway (Route 99) northbound approach, the analysis shows that the intersection will operate at LOS A in the Friday p.m. peak hour, Friday p.m. “real” peak hour, and Saturday afternoon peak hour, an improvement over the No Build Condition, demonstrating that the improvements discussed in Section 2.2.1.1 effectively mitigate the Project’s traffic at this intersection.

51. Dexter Street/Alford Street (Route 99)

The intersection of Dexter Street/Alford Street (Route 99) was analyzed in the No Build (2023), Build (2023), and Build (2023) with Mitigation Conditions. That analysis shows that this intersection operates at LOS B in the No Build Condition during the Friday p.m. peak hour and the Friday p.m. “real” peak hour and LOS A during the Saturday peak hour.

As a result of the improvements discussed in Section 2.2.1.1, the overall LOS at this intersection changes from LOS B in the No Build (2023) Condition to LOS C under the Build with Mitigation Condition during the Friday p.m. peak hour. The overall LOS at this intersection changes from LOS A in the No Build (2023) Condition to LOS B under the Build with Mitigation Condition during the Saturday afternoon peak hour. The intersection will continue to operate at LOS B during the Friday p.m. “real” peak hour in the Build with Mitigation Condition, as it does in the No Build (2023) Condition. The reason for these changes is a slight additional delay as a result of adjusting traffic signal timing at this intersection to accommodate pedestrian crossings in accordance with federal safety guidelines. The intersection is being widened slightly to provide an exclusive left-turn lane on the Alford Street (Route 99) northbound approach, which means that the pedestrian crossing time also needs to be longer. Even with the traffic signal timing adjustment

necessary to comply with federal safety guidelines for pedestrian crossing time, this intersection will still operate at a LOS significantly higher than LOS E, which is considered acceptable for urban intersections.



Table 2-14: Capacity Analysis Summary, Friday p.m. Peak Hour, Lower Broadway/Alford Street (Route 99), Everett/Boston

Intersection	Existing (2014) Conditions						No Build (2023) Conditions						Build (2023) Conditions						Build (2023) with Mitigation Conditions								
	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)			
1. (U) Horizon Way/ Broadway (Route 99)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Horizon EB left /right	D	34.9	0.24	27	80	145	F	65.0	0.32	93	194	145	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Broadway (Route 99) NB left/thru thru	A	0.2	0.64	83	280	265	A	0.2	0.75	270	306	265	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Broadway (Route 99) SB thru thru/right	A	0.0	0.50	2	16	480	A	0.0	0.60	14	96	480	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
1. (S) Site Driveway/ Broadway (Route 99)	-	-	-	-	-	-	-	-	-	-	-	-	C	31.4	0.84	-	-	-	C	24.3	0.84	-	-	-	-	-	-
Site Driveway EB left	-	-	-	-	-	-	-	-	-	-	-	-	F	11.08	0.90	244	355	120	D	52.6	0.52	84	134	120	-	-	-
Site Driveway EB left/thru	-	-	-	-	-	-	-	-	-	-	-	-	F	113.3	0.91	214	328	>800	D	52.6	0.53	60	119	>800	-	-	-
Site Driveway EB right right	-	-	-	-	-	-	-	-	-	-	-	-	D	37.6	0.63	99	239	>800	D	35.9	0.60	155	241	>800	-	-	-
Broadway (Route 99) NB left left	-	-	-	-	-	-	-	-	-	-	-	-	D	53.2	0.60	90	185	405	D	44.0	0.89	117	191	405	-	-	-
Broadway (Route 99) NB thru thru/right	-	-	-	-	-	-	-	-	-	-	-	-	B	10.7	0.83	395	536	405	A	7.2	0.89	69	181	405	-	-	-
Broadway (Route 99) SB left	-	-	-	-	-	-	-	-	-	-	-	-	E	68.9	0.58	31	75	125	D	56.0	0.58	32	81	125	-	-	-
Broadway (Route 99) SB thru thru	-	-	-	-	-	-	-	-	-	-	-	-	D	38.7	0.93	264	336	575	C	32.5	0.88	260	276	>800	-	-	-
Broadway (Route 99) SB right	-	-	-	-	-	-	-	-	-	-	-	-	B	20.0	0.35	93	180	400	B	15.7	0.33	258	274	400	-	-	-
7. (S) Beacham Street/Broadway (Route 99)	F	105.4	1.01	-	-	-	F	284.6	1.34	-	-	-	F	359.0	1.53	-	-	-	D	47.5	1.04	-	-	-	-	-	-
McDonalds/Service Driveway EB left/thru	C	33.4	0.17	24	53	60	C	33.1	0.14	25	57	60	C	33.1	0.13	22	52	60	D	40.5	0.14	21	52	140	-	-	-
McDonalds/Service Driveway EB right	C	32.3	0.04	23	48	60	C	32.2	0.03	27	55	60	C	32.2	0.03	31	61	60	D	39.5	0.03	30	59	140	-	-	-
Beacham WB left/thru/right	F	184.3	1.26	225	383	290	F	196.2	1.29	245	404	290	F	224.3	1.36	483	876	290	F	260.0	1.42	689	905	290	-	-	-
Broadway (Route 99) NB left*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	C	26.4	0.54	41	109	180	-	-	-
Broadway (Route 99) NB [left]/thru thru/right	F	167.9	1.28	481	620	525	F	541.2	2.11	523	534	525	F	683.5	2.43	525	542	525	C	38.0	1.00	150	266	>800	-	-	-
Broadway (Route 99) SB left*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	D	43.3	0.40	64	161	120	-	-	-
Broadway (Route 99) SB [left]/thru	B	16.5	0.62	203	346	690	C	22.7	0.84	223	341	690	D	47.3	1.00	457	828	690	B	12.3	0.73	527	898	636	-	-	-
8. (S) Bowdoin Street/Broadway (Route 99)	A	5.3	0.50	-	-	-	B	17.7	0.79	-	-	-	C	29.1	0.92	-	-	-	A	8.0	0.61	-	-	-	-	-	-
Bowdoin EB left/right	D	48.1	0.31	29	65	210	D	51.0	0.55	62	117	210	D	51.0	0.55	91	150	210	D	54.6	0.46	89	139	210	-	-	-
Broadway (Route 99) NB left*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	A	9.1	0.54	40	92	125	-	-	-
Broadway (Route 99) NB [left]/thru thru	A	4.5	0.54	22	68	665	C	25.8	0.85	66	146	665	D	48.2	1.01	75	182	636	A	5.4	0.66	171	288	636	-	-	-
Broadway (Route 99) SB thru thru/right	A	4.5	0.44	66	176	260	A	5.8	0.53	97	219	260	A	6.9	0.63	151	279	260	A	7.8	0.63	159	293	260	-	-	-
51. (S) Dexter Street/Alford Street (Route 99)	B	10.6	0.68	-	-	-	B	12.6	0.77	-	-	-	B	19.8	0.96	-	-	-	C	25.1	0.97	-	-	-	-	-	-
Driveway EB left/thru/right	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Dexter WB left/thru/right	D	335.3	0.69	112	158	640	D	35.1	0.68	118	165	640	E	68.8	0.85	107	123	640	E	64.8	0.82	160	235	640	-	-	-
Alford (Route 99) NB left*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Alford (Route 99) NB [left]/thru thru/right	A	9.0	0.67	254	611	650	B	11.5	0.79	737	872	650	C	21.2	0.94	748	921	650	C	24.3	0.96	749	768	650	-	-	-
Alford (Route 99) SB left/thru thru/right	A	7.2	0.54	133	233	259	A	9.8	0.71	166	277	259	B	11.5	0.89	197	499	405	B	20.6	0.92	418	639	405	-	-	-

1. Queue shown is the longest reported average for the movement/approach. Queues derived from average of five SimTraffic simulations.

(S) signalized intersection (U) unsignalized intersection

* Indicates that lane was added as part of Build – Mitigated condition. □ indicates that lane/movement was removed as part of Build – Mitigated condition.

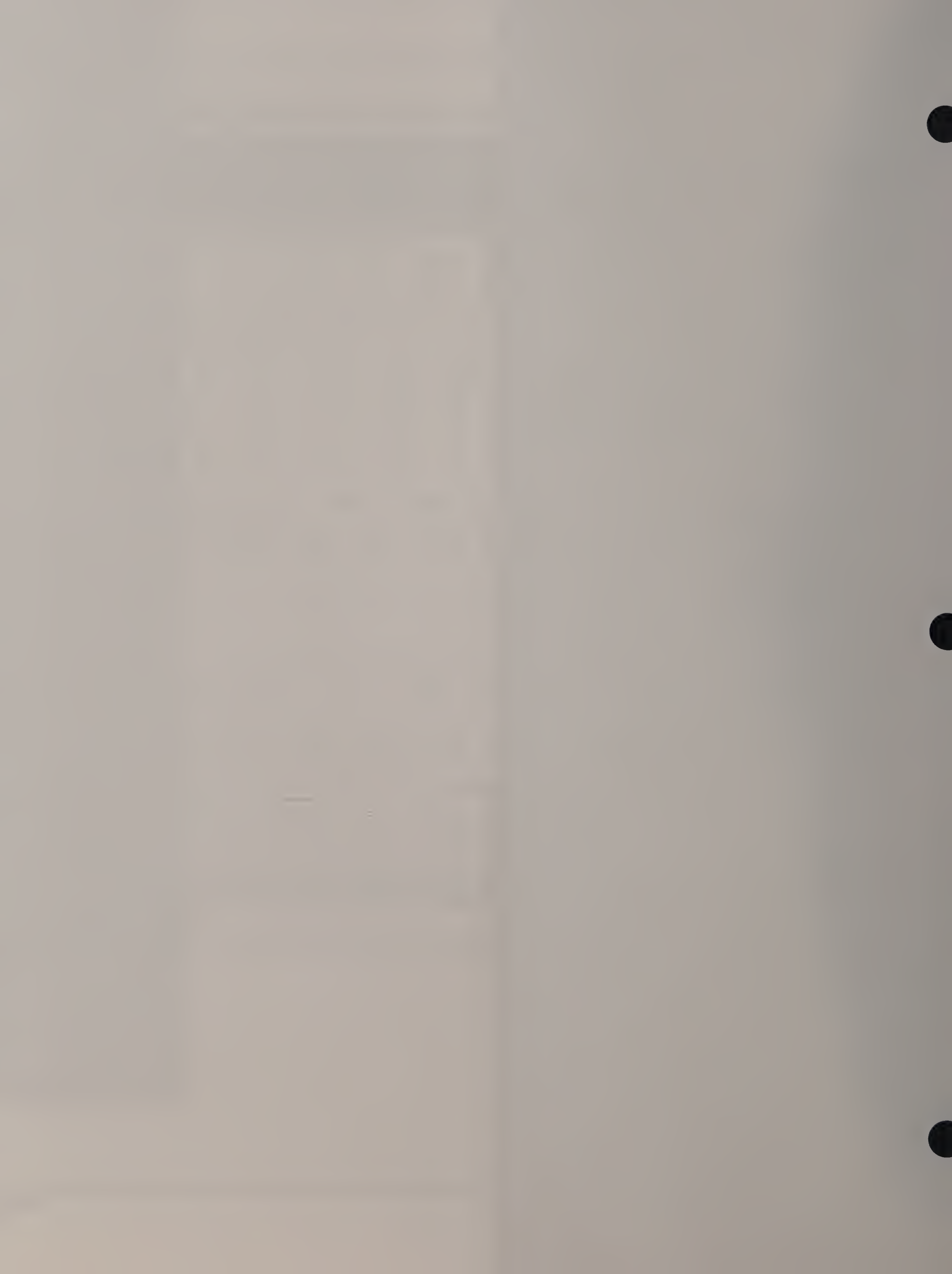


Table 2-15: Capacity Analysis Summary, Saturday Afternoon Peak Hour, Lower Broadway/Alford Street (Route 99), Everett/Boston

Intersection	Existing (2014) Conditions						No Build (2023) Conditions						Build (2023) Conditions						Build (2023) with Mitigation Conditions						
	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	
1. (U) Horizon Way/ Broadway (Route 99)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Horizon EB left /right	C	19.5	0.07	12	36	145	C	23.3	0.08	15	45	145	-	-	-	-	-	-	-	-	-	-	-	-	-
Broadway (Route 99) NB left/thru thru	A	0.1	0.48	1	11	265	A	0.1	0.53	37	175	265	-	-	-	-	-	-	-	-	-	-	-	-	-
Broadway (Route 99) SB thru thru/right	A	0.0	0.57	1	17	480	A	0.0	0.63	3	29	480	-	-	-	-	-	-	-	-	-	-	-	-	-
1. (S) Site Driveway/Broadway (Route 99)	-	-	-	-	-	-	-	-	-	-	-	-	C	34.2	0.88	-	-	-	C	32.5	0.92	-	-	-	
Site Driveway EB left	-	-	-	-	-	-	-	-	-	-	-	-	E	57.5	0.63	198	334	120	D	53.4	0.57	83	139	120	
Site Driveway EB left/thru	-	-	-	-	-	-	-	-	-	-	-	-	E	57.7	0.64	173	304	>800	D	53.5	0.58	61	114	>800	
Site Driveway EB right right	-	-	-	-	-	-	-	-	-	-	-	-	D	35.6	0.66	169	270	>800	D	37.2	0.69	143	218	>800	
Broadway (Route 99) NB left left	-	-	-	-	-	-	-	-	-	-	-	-	E	65.1	0.92	239	453	405	E	71.0	0.99	216	339	405	
Broadway (Route 99) NB thru thru/right	-	-	-	-	-	-	-	-	-	-	-	-	A	9.7	0.63	422	551	405	A	7.1	0.62	73	197	405	
Broadway (Route 99) SB left	-	-	-	-	-	-	-	-	-	-	-	-	E	60.9	0.51	32	73	125	E	66.1	0.54	25	71	125	
Broadway (Route 99) SB thru thru	-	-	-	-	-	-	-	-	-	-	-	-	D	42.3	0.95	270	289	575	D	39.7	1.01	262	299	>800	
Broadway (Route 99) SB right	-	-	-	-	-	-	-	-	-	-	-	-	B	18.8	0.30	113	217	400	A	6.1	0.31	117	220	400	
7. (S) Beacham Street/Broadway (Route 99)	D	52.3	0.89	-	-	-	E	76.6	1.06	-	-	-	F	213.4	1.38	-	-	-	D	42.5	0.95	-	-	-	
McDonalds/Service Driveway EB left/thru	C	33.0	0.12	21	51	60	C	24.5	0.09	23	52	60	C	24.7	0.13	23	53	60	D	40.6	0.15	27	55	140	
McDonalds/Service Driveway EB right	C	32.3	0.04	26	50	60	C	24.1	0.04	21	57	60	C	24.1	0.04	32	62	60	D	39.5	0.04	35	60	140	
Beacham WB left/thru/right	F	146.5	1.16	214	342	290	F	81.4	1.00	155	248	290	F	105.9	1.08	199	376	290	F	229.2	1.35	529	822	290	
Broadway (Route 99) NB left*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	D	54.9	0.64	53	148	180	
Broadway (Route 99) NB [left]/thru thru/right	E	71.5	1.04	306	509	525	F	128.1	1.21	379	627	525	F	351.7	1.71	527	544	525	C	32.1	0.88	212	386	>800	
Broadway (Route 99) SB left*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	C	32.4	0.14	34	112	120	
Broadway (Route 99) SB [left]/thru	B	14.8	0.59	180	297	690	C	33.5	0.96	207	342	690	F	126.1	1.22	540	894	690	B	15.3	0.82	537	930	636	
8. (S) Bowdoin Street/Broadway (Route 99)	A	4.6	0.42	-	-	-	A	8.3	0.62	-	-	-	A	9.9	0.74	-	-	-	A	7.7	0.63	-	-	-	
Bowdoin EB left/right	D	45.3	0.21	31	69	210	C	30.4	0.39	51	90	210	D	38.7	0.46	59	109	210	D	54.9	0.48	88	145	210	
Broadway (Route 99) NB left*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	B	14.3	0.55	39	86	125	
Broadway (Route 99) NB [left]/thru thru	A	2.1	0.45	25	86	665	A	8.1	0.69	122	260	665	B	10.8	0.81	132	289	636	A	2.7	0.53	26	106	636	
Broadway (Route 99) SB thru thru/right	A	5.3	0.47	73	204	260	A	6.7	0.59	121	228	260	A	7.2	0.67	174	289	260	A	8.5	0.68	178	297	260	
51. (S) Dexter Street/Alford Street (Route 99)	A	6.9	0.54	-	-	-	A	7.6	0.67	-	-	-	B	10.4	0.87	-	-	-	B	12.5	0.91	-	-	-	
Driveway EB left/thru/right	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
Dexter WB left/thru/right	C	33.4	0.51	90	138	640	C	28.8	0.50	88	142	640	E	54.8	0.61	92	139	640	D	54.6	0.61	92	132	640	
Alford (Route 99) NB left*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
Alford (Route 99) NB [left]/thru thru/right	A	5.0	0.48	77	134	>800	A	5.4	0.56	109	224	>800	A	5.0	0.51	725	980	650	A	7.9	0.72	747	926	650	
Alford (Route 99) SB left/thru thru/right	A	5.5	0.54	108	198	259	A	7.3	0.71	151	231	259	B	11.5	0.87	270	457	405	B	13.2	0.91	346	603	405	

1. Queue shown is the longest reported average for the movement/approach. Queues derived from average of five SimTraffic simulations.

(S) signalized intersection (U) unsignalized intersection

* Indicates that lane was added as part of Build – Mitigated condition. [] indicates that lane/movement was removed as part of Build – Mitigated condition.

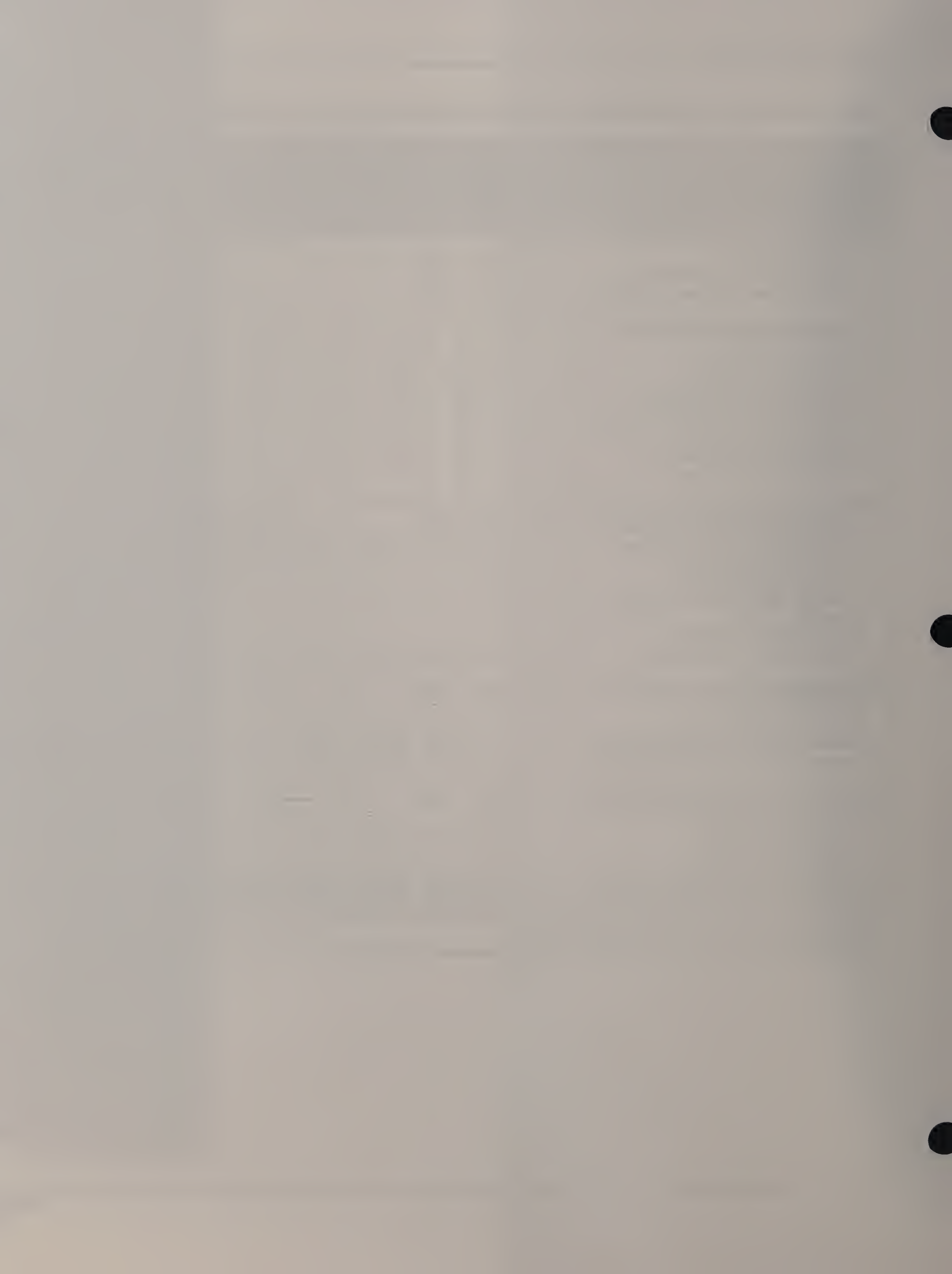


Table 2-16: Capacity Analysis Summary, Friday p.m. "Real" Peak Hour, Lower Broadway/Alford Street (Route 99), Everett/Boston

Intersection	Existing (2014) Conditions						No Build (2023) Conditions						Build (2023) Conditions						Build (2023) with Mitigation Conditions								
	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)			
1. (U) Horizon Way/ Broadway (Route 99)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Horizon EB left /right	D	34.9	0.24	27	80	145	F	65.0	0.32	93	194	145	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Broadway (Route 99) NB left/thru thru	A	0.2	0.64	83	280	265	A	0.2	0.75	270	306	265	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Broadway (Route 99) SB thru thru/right	A	0.0	0.50	2	16	480	A	0.0	0.60	14	96	480	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
1. (S) Site Driveway/Broadway (Route 99)	--	--	--	--	--	--	--	--	--	--	--	--	B	19.7	0.78	--	--	--	B	19.8	0.80	--	--	--	--	--	--
Site Driveway EB left	--	--	--	--	--	--	--	--	--	--	--	--	E	59.1	0.54	235	358	120	D	53.5	0.41	53	93	120	--	--	--
Site Driveway EB left/thru	--	--	--	--	--	--	--	--	--	--	--	--	E	59.1	0.54	201	324	>800	D	53.5	0.41	29	76	>800	--	--	--
Site Driveway EB right right	--	--	--	--	--	--	--	--	--	--	--	--	D	47.0	0.60	106	220	>800	D	34.4	0.38	70	133	>800	--	--	--
Broadway (Route 99) NB left left	--	--	--	--	--	--	--	--	--	--	--	--	E	66.8	0.70	109	212	405	C	34.4	0.51	69	120	405	--	--	--
Broadway (Route 99) NB thru thru/right	--	--	--	--	--	--	--	--	--	--	--	--	A	6.8	0.83	385	565	405	A	6.5	0.86	66	184	405	--	--	--
Broadway (Route 99) SB left	--	--	--	--	--	--	--	--	--	--	--	--	E	68.9	0.58	26	67	125	D	53.6	0.53	27	71	125	--	--	--
Broadway (Route 99) SB thru thru	--	--	--	--	--	--	--	--	--	--	--	--	B	19.1	0.74	266	321	575	C	28.3	0.83	250	319	>800	--	--	--
Broadway (Route 99) SB right	--	--	--	--	--	--	--	--	--	--	--	--	A	9.9	0.10	89	172	400	B	11.3	0.18	57	119	400	--	--	--
7. (S) Beacham Street/Broadway (Route 99)	F	105.4	1.01	--	--	--	F	284.6	1.34	--	--	--	F	325.5	1.45	--	--	--	D	41.9	0.99	--	--	--	--	--	--
McDonalds/Service Driveway EB left/thru	C	33.4	0.17	24	53	60	C	33.1	0.14	25	57	60	C	33.1	0.03	22	54	60	D	40.5	0.14	23	54	140	--	--	--
McDonalds/Service Driveway EB right	C	32.3	0.04	23	48	60	C	32.2	0.03	27	55	60	C	32.2	0.01	33	62	60	D	39.5	0.03	28	54	140	--	--	--
Beacham WB left/thru/right	F	184.3	1.26	225	383	290	F	196.2	1.29	245	404	290	F	213.5	1.33	496	873	290	F	249.9	1.40	533	858	290	--	--	--
Broadway (Route 99) NB left*	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	B	19.5	0.42	34	104	180	--	--	--
Broadway (Route 99) NB [left]/thru thru/right	F	167.9	1.28	481	620	525	F	541.2	2.11	523	534	525	F	623.1	2.29	524	539	525	C	29.2	0.95	146	145	>800	--	--	--
Broadway (Route 99) SB left*	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	C	35.7	0.40	61	146	120	--	--	--
Broadway (Route 99) SB [left]/thru	B	16.5	0.62	203	346	690	C	22.7	0.84	223	341	690	C	32.2	0.93	478	846	690	A	9.0	0.68	322	723	636	--	--	--
8. (S) Bowdoin Street/Broadway (Route 99)	A	5.3	0.50	--	--	--	B	17.7	0.79	--	--	--	C	22.2	0.86	--	--	--	A	8.1	0.58	--	--	--	--	--	--
Bowdoin EB left/right	D	48.1	0.31	29	65	210	D	51.0	0.55	62	117	210	D	51.0	0.55	80	135	210	D	54.6	0.46	59	114	210	--	--	--
Broadway (Route 99) NB left*	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	A	8.8	0.46	35	73	125	--	--	--
Broadway (Route 99) NB [left]/thru thru	A	4.5	0.54	22	68	665	C	25.8	0.85	66	146	665	C	34.6	0.94	81	192	636	A	6.1	0.63	22	71	636	--	--	--
Broadway (Route 99) SB thru thru/right	A	4.5	0.44	66	176	260	A	5.8	0.53	97	219	260	A	6.4	0.59	149	281	260	A	7.2	0.59	135	257	260	--	--	--
51. (S) Dexter Street/Alford Street (Route 99)	B	10.6	0.68	--	--	--	B	12.6	0.77	--	--	--	B	17.0	0.90	--	--	--	B	17.6	0.90	--	--	--	--	--	--
Driveway EB left/thru/right	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Dexter WB left/thru/right	D	335.3	0.69	112	158	640	D	35.1	0.68	118	165	640	E	58.0	0.77	107	124	640	E	64.8	0.82	169	240	640	--	--	--
Alford (Route 99) NB left*	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Alford (Route 99) NB [left]/thru thru/right	A	9.0	0.67	254	611	>800	B	11.5	0.79	737	872	>800	B	17.5	0.88	749	944	>800	B	15.8	0.87	749	985	>800	--	--	--
Alford (Route 99) SB left/thru thru/right	A	7.2	0.54	133	233	259	A	9.8	0.71	166	277	259	B	10.2	0.80	209	520	405	B	12.4	0.79	327	617	405	--	--	--

1. Queue shown is the longest reported average for the movement/approach. Queues derived from average of five SimTraffic simulations.

(S) signalized intersection (U) unsignalized intersection

* Indicates that lane was added as part of Build – Mitigated condition. [] indicates that lane/movement was removed as part of Build – Mitigated condition.

2.2.2 SANTILLI CIRCLE, EVERETT

Formerly a rotary, Santilli Circle has been signalized in recent years so, while the rotary shape remains, there are now two signalized intersections through which much of the traffic through the Circle must pass. Volume diagrams for the Existing (2013) Friday p.m. and Saturday afternoon peak hours are shown in Figure 2-14 and Figure 2-15. The No Build (2023) Friday p.m. and Saturday afternoon peak hour volumes are shown in Figure 2-16 and Figure 2-17. The Project-generated trips for the Friday p.m. peak hour are shown in Figure 2-18, for the Saturday afternoon peak hour in Figure 2-19, and for the Friday p.m. “real” peak hour in Figure 2-20. The Build (2023) Friday p.m. and Saturday afternoon peak hour volumes, which add the updated Project-generated trips to the No Build volumes, are shown in Figure 2-21 and Figure 2-22. The Build (2023) Friday p.m. “real” peak hour volumes are shown in Figure 2-23.

2.2.2.1 MITIGATION

To address both current and projected future operational deficiencies at Santilli Circle, the Proponent proposes to improve the signalized rotary in a way that the analyses show will effectively mitigate the Project’s impacts on Santilli Circle.

In response to concerns about the Proponent’s previously proposed improvements to Santilli Circle, the improvements now to Santilli Circle now proposed are much simpler. They include widening the roadway on the north side of the rotary to provide three travel lanes, providing more room for vehicles destined for the Gateway Center/Mystic View Road and to allow vehicles to bypass the queues of those vehicles and reach Revere Beach Parkway (Route 16) westbound; and channelizing the roadway on the south side of the rotary through a combination of pavement markings and raised islands to remove the weaving area between Mystic View Road and Revere Beach Parkway (Route 16) which, in combination with new guide signage and signal timing and phasing adjustments, will improve traffic flow. The improvements also include an enhanced, accessible pedestrian path along the western and northern sides of the rotary and across Santilli Highway. The improvements will also include landscape amenities and stormwater BMPs.

The proposed improvements to Santilli Circle are shown in Figure 2-24A. Eighty-scale (80-scale) plans of the proposed improvements at Santilli Circle are shown in Figure 2-24B, Figure 2-24C, and Figure 2-24D.

It is expected that the necessary construction will require two construction seasons to complete. A construction project on the Woods Memorial Bridge (Revere Beach Parkway (Route 16) over the Malden River) will begin in the winter of 2015. Therefore, in the course of the continued design of the Santilli Circle improvements, the Proponent will continue to work with MassDOT, DCR, and the City of Everett on a mutually acceptable schedule for the construction of the Santilli Circle improvements.

The Proponent has also agreed to conduct a Road Safety Audit (RSA) in connection with the continuing design of the Santilli Circle improvements.

The Proponent has closely collaborated with MassDOT in the development of these Santilli Circle improvements. In the course of that collaboration, MassDOT raised several concerns about prior mitigation plans, all of which were addressed by the revised plan for Santilli Circle improvements.

Signal Timing Adjustments

DCR requested that details of the proposed signal timing at Santilli Circle be provided. The proposed signal timing adjustments for Friday p.m. and Saturday afternoon peak hours are shown in Table 2-17 and Table 2-18.

Table 2-17: Signal Timing Adjustment Summary, Friday p.m. Peak Hour, Santilli Circle, Everett

Lane Group	Existing Conditions					Build Mitigated Conditions				
	Phase	Min Green	Max Green	Yellow	All Red	Phase	Min Green	Max Green	Yellow	All Red
West Intersection										
EB Thru/Right	2	8	49	4	2	2	8	53	4	2
WB Thru	6	8	49	4	2	6	8	53	4	2
SB Thru	4	8	19	4	2	4	8	15	4	2
East Intersection										
EB Thru	2	8	49	4	2	2	8	46	4	2
WB Thru/Right	6	8	49	4	2	6	8	46	4	2
NB Thru	4	8	19	4	2	4	8	22	4	2

Table 2-18: Signal Timing Adjustment Summary, Saturday Afternoon Peak Hour, Santilli Circle, Everett

Lane Group	Existing Conditions					Build Mitigated Conditions				
	Phase	Min Green	Max Green	Yellow	All Red	Phase	Min Green	Max Green	Yellow	All Red
West Intersection										
EB Thru/Right	2	8	49	4	2	2	8	53	4	2
WB Thru	6	8	49	4	2	6	8	53	4	2
SB Thru	4	8	19	4	2	4	8	15	4	2
East Intersection										
EB Thru	2	8	49	4	2	2	8	37	4	2
WB Thru/Right	6	8	49	4	2	6	8	37	4	2
NB Thru	4	8	19	4	2	4	8	31	4	2

2.2.2.2 TRAFFIC ANALYSIS

As described in Section 2.1.3, Santilli Circle was analyzed in the No Build (2023), Build (2023), and Build (2023) with Mitigation Conditions. That analysis, which has been the subject of consultation MassDOT, shows that, as a result of the improvements discussed in Section 2.2.2.1, operations in Santilli Circle in the Build with Mitigation Condition will be better than in the No Build Condition, demonstrating that the improvements discussed in Section 2.2.2.1 effectively mitigate the Project's traffic at these intersections.

That analysis shows that the western signalized intersection at Santilli Circle will operate well at LOS B in the No Build Condition during the Friday p.m. peak hour, and LOS A during the Saturday peak hour, and LOS B in the Friday p.m. "real" peak hour. However, the same analysis shows that the eastern signalized intersection doesn't operate nearly as well in the No Build Condition, with at LOS E in the No Build Condition during the Friday p.m. peak hour, and LOS D during the Saturday peak hour, and LOS E in the Friday p.m. "real" peak hour.

As a result of the improvements discussed in Section 2.2.2.1, the analysis shows that the western signalized intersection at Santilli Circle will operate well at LOS C in the Build with Mitigation Condition during the Friday p.m. peak hour, and LOS A during the Saturday peak hour, and LOS B in the Friday p.m. "real" peak hour. However, the analysis shows that the eastern signalized intersection is significantly improved in the Build with Mitigation Condition, at LOS C during the Friday p.m. peak hour, and LOS B during the Saturday peak hour, and LOS C in the Friday p.m. "real" peak hour.

Because the western and eastern intersections, and their operations, are interrelated, improving the LOS of the eastern intersection, which is substantially degraded relative to the western intersection in the No-Build Condition, will result in some increased delay at the western intersection. However, because the improvement in operations at the eastern intersection is much more significant than the related delay at the western intersection, the overall operations of Santilli Circle will improve.

CASTs for all conditions during the Friday p.m., Saturday afternoon, and Friday p.m. "real" peak hours are provided in Table 2-19, Table 2-20, and Table 2-21. Synchro and VISSIM output can be found in Appendix B.

Table 2-19: Capacity Analysis Summary, Friday p.m. Peak Hour, Santilli Circle, Everett

Intersection	Existing (2013) Conditions						No Build (2023) Conditions						Build (2023) Conditions						Build (2023) with Mitigation Conditions					
	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)
10. Revere Beach Parkway (Route 16)/Santilli Highway/Mystic View Road/Route 99 Connector (Santilli Circle)																								
(S) Western Intersection	A	7.9	0.82	–	–	–	B	15.6	1.14	–	–	–	C	22.8	1.18	–	–	–	C	20.4	1.18	–	–	–
Route 16 EB thru thru thru/right*	A	7.6	0.53	174	244	>800	B	10.5	0.65	204	294	<800	B	10.5	0.65	198	390	>800	A	8.5	0.61	182	336	>800
[Route 16 EB bear right (to Circle)]	B	11.5	0.66	136	256	350	C	28.6	0.92	191	352	350	D	45.4	1.00	262	434	350	D	42.6	1.00	249	428	350
Route 16 WB thru thru thru	A	3.3	0.49	78	118	450	A	3.9	0.57	91	135	450	A	3.9	0.57	90	141	450	A	0.1	0.54	24	67	450
Rotary SB thru	C	32.1	0.63	132	224	120	C	34.8	0.80	135	236	120	C	34.8	0.80	139	240	120	E	56.5	0.96	131	222	120
Rotary SB bear right	A	3.6	0.70	220	243	110	C	20.7	0.97	222	243	110	C	26.5	0.99	219	245	110	C	30.2	1.01	220	243	110
(S) Eastern Intersection	C	31.1	0.75	–	–	–	E	60.9	0.87	–	–	–	E	60.9	0.87	–	–	–	C	20.6	0.87	–	–	–
Route 16 EB thru thru thru	A	4.7	0.59	174	244	450	A	4.8	0.66	84	127	450	A	4.8	0.66	85	129	450	A	12.8	0.83	158	216	450
Route 16 WB thru thru thru/right	A	9.9	0.60	78	118	>800	B	11.0	0.68	202	267	>800	B	11.0	0.68	203	272	>800	B	21.2	0.86	293	390	>800
Rotary NB thru thru thru	F	97.1	1.12	220	243	375	F	197.6	1.36	235	253	375	F	197.6	1.36	235	253	375	C	29.8	0.89	232	263	375

1. Queue shown is the longest reported average for the movement/approach. Queues derived from average of five SimTraffic simulations.

(S) signalized intersection (U) unsignalized intersection

* Indicates that lane was added as part of Build – Mitigated condition. [] indicates that lane/movement was removed as part of Build – Mitigated condition.

Table 2-20: Capacity Analysis Summary, Saturday Afternoon Peak Hour, Santilli Circle, Everett

Intersection	Existing (2014) Conditions						No Build (2023) Conditions						Build (2023) Conditions						Build (2023) with Mitigation Conditions					
	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)
10. Revere Beach Parkway (Route 16)/Santilli Highway/Mystic View Road/Route 99 Connector (Santilli Circle)																								
(S) Western Intersection	A	8.5	0.80	–	–	–	A	8.5	0.92	–	–	–	A	9.4	0.98	–	–	–	A	8.5	0.98	–	–	–
Route 16 EB thru thru thru/right*	A	6.6	0.35	138	198	>800	A	7.3	0.41	147	215	<800	A	7.3	0.41	146	210	>800	A	6.3	0.39	125	193	>800
[Route 16 EB bear right (to Circle)]	A	7.6	0.38	71	131	350	A	9.5	0.51	90	164	350	B	13.0	0.69	125	226	350	B	11.2	0.66	110	194	350
Route 16 WB thru thru thru	A	3.5	0.44	67	107	450	A	32.6	0.48	77	116	450	A	3.6	0.48	84	152	450	A	0.1	0.46	19	72	450
Rotary SB thru	C	32.1	0.67	152	217	120	C	5.2	0.71	147	237	120	C	32.6	0.71	150	244	120	D	39.1	0.82	142	243	120
Rotary SB bear right	A	3.3	0.68	205	270	110	A	0.78	221	243	110	A	7.1	0.83	221	245	110	A	7.0	0.83	220	243	110	
(S) Eastern Intersection	C	25.5	0.70	–	–	–	D	49.8	0.79	–	–	–	E	74.7	0.83	–	–	–	B	19.9	0.83	–	–	–
Route 16 EB thru thru thru	A	4.4	0.39	53	91	450	A	4.3	0.43	57	98	450	A	4.3	0.43	56	111	450	B	11.0	0.56	107	176	450
Route 16 WB thru thru thru/right	A	9.5	0.57	174	243	>800	B	10.1	0.62	191	265	>800	B	10.1	0.62	185	243	>800	C	21.1	0.82	262	356	>800
Rotary NB thru thru thru	E	67.9	1.04	229	282	375	F	140.5	1.23	231	270	375	F	204.1	1.37	230	239	375	C	25.5	0.84	229	259	375

1. Queue shown is the longest reported average for the movement/approach. Queues derived from average of five SimTraffic simulations.

(S) signalized intersection (U) unsignalized intersection

* Indicates that lane was added as part of Build – Mitigated condition. [] indicates that lane/movement was removed as part of Build – Mitigated condition.

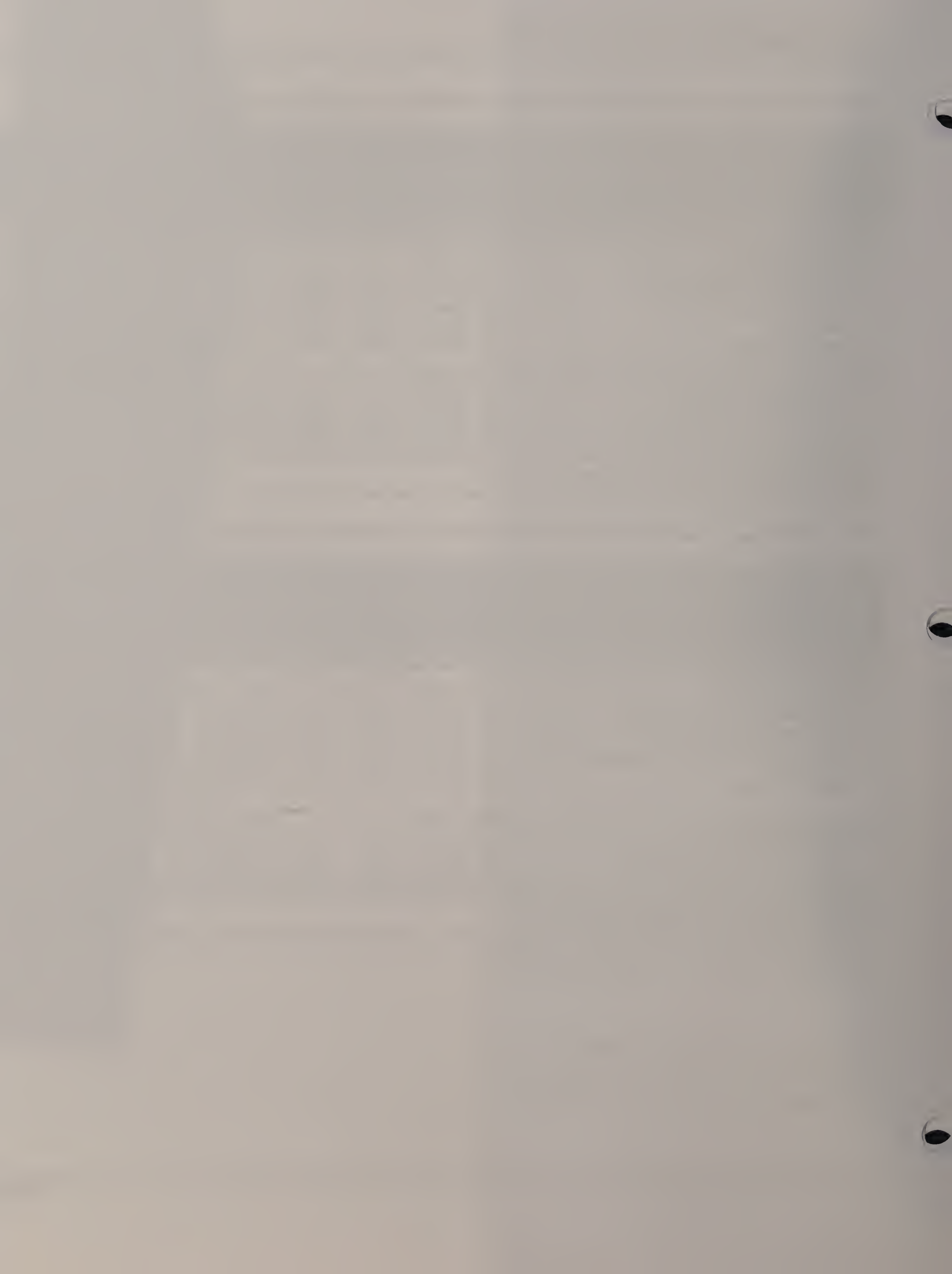


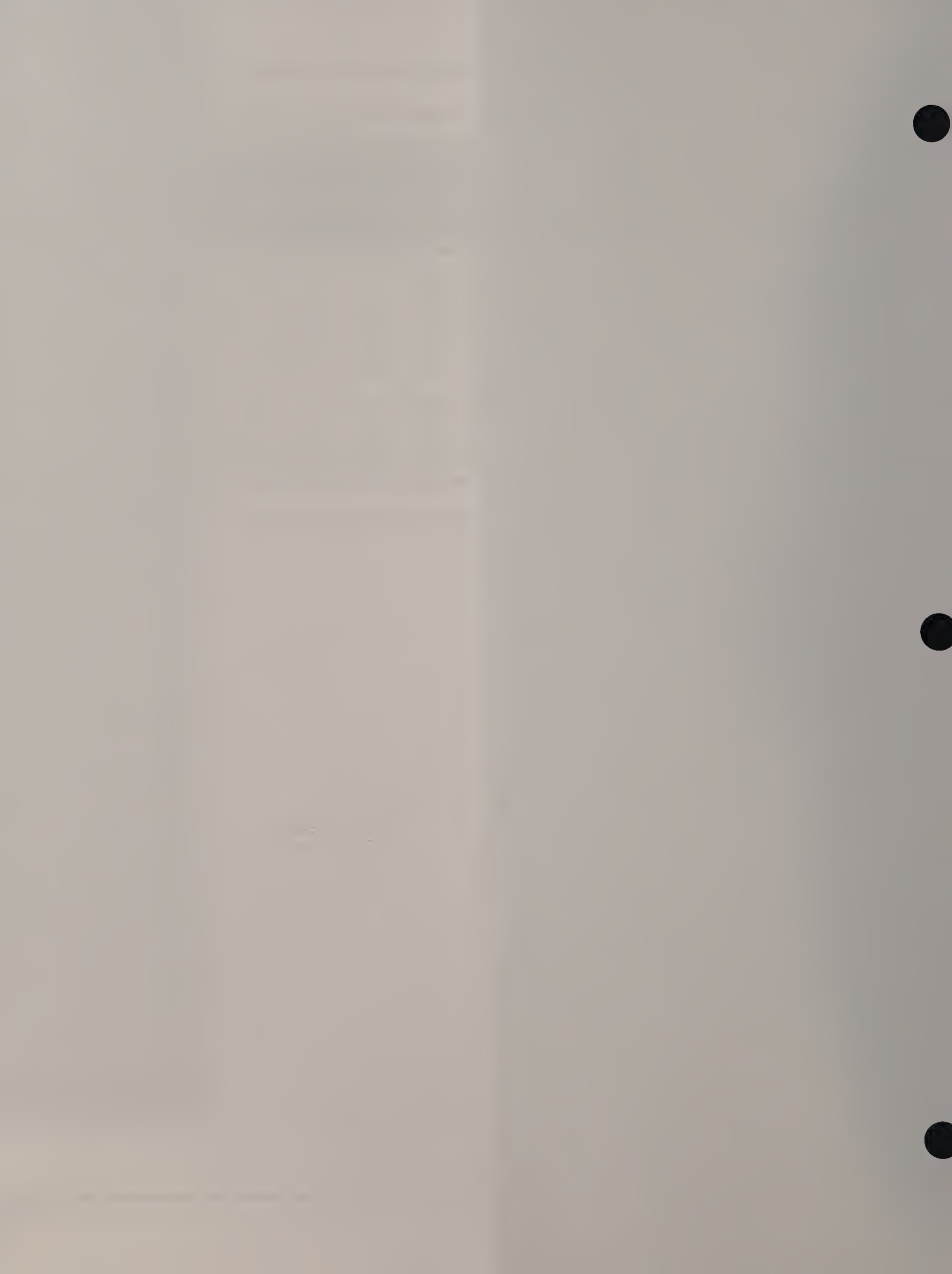
Table 2-21: Capacity Analysis Summary, Friday p.m. "Real" Peak Hour, Santilli Circle, Everett

Intersection	Existing (2014) Conditions						No Build (2023) Conditions						Build (2023) Conditions						Build (2023) with Mitigation Conditions					
	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)
10. Revere Beach Parkway (Route 16)/Santilli Highway/Mystic View Road/Route 99 Connector (Santilli Circle)																								
(S) Western Intersection	A	7.9	0.82	–	–	–	B	15.6	1.14	–	–	–	B	19.3	1.17	–	–	–	B	17.7	1.17	–	–	–
Route 16 EB thru thru thru/right* [Route 16 EB bear right (to Circle)]	A	7.6	0.53	174	244	>800	B	10.5	0.65	204	294	<800	B	10.5	0.65	198	33	>800	A	8.5	0.61	179	270	>800
Route 16 WB thru thru thru	B	11.5	0.66	136	256	350	C	28.6	0.92	191	352	350	D	45.4	1.01	232	4413	350	C	30.8	0.95	218	392	350
Rotary SB thru	A	3.3	0.49	78	118	450	A	3.9	0.57	91	135	450	A	3.9	0.57	89	133	450	A	0.1	0.56	32	112	450
Rotary SB bear right	C	32.1	0.63	132	224	120	C	34.8	0.80	135	236	120	C	34.8	0.80	142	244	120	D	56.5	0.96	138	211	120
	A	3.6	0.70	220	243	110	C	20.7	0.97	222	243	110	C	26.5	0.99	221	245	110	C	26.5	0.99	220	244	110
(S) Eastern Intersection	C	31.1	0.75	–	–	–	E	60.9	0.87	–	–	–	E	71.3	0.89	–	–	–	C	21.9	0.89	–	–	–
Route 16 EB thru thru thru	A	4.7	0.59	174	244	450	A	4.8	0.66	84	127	450	A	4.8	0.66	85	129	450	B	14.0	0.85	161	224	450
Route 16 WB thru thru thru/right	A	9.9	0.60	78	118	>800	B	11.0	0.68	202	267	>800	B	11.0	0.68	203	272	>800	C	23.0	0.88	293	393	>800
Rotary NB thru thru thru	F	97.1	1.12	220	243	375	F	197.6	1.36	235	253	375	F	227.0	1.43	235	253	375	C	30.1	0.90	231	258	375

1. Queue shown is the longest reported average for the movement/approach. Queues derived from average of five SimTraffic simulations.

(S) signalized intersection (U) unsignalized intersection

* Indicates that lane was added as part of Build – Mitigated condition. □ indicates that lane/movement was removed as part of Build – Mitigated condition.



2.2.3 SWEETSER CIRCLE, EVERETT

Sweetser Circle is the rotary intersection of Route 16 Connector, Main Street, and Broadway (Route 99).

Volume diagrams for the Existing 2013 Friday p.m. and Saturday afternoon peak hours are shown in Figure 2-14 and Figure 2-15. The No Build (2023) Friday p.m. and Saturday afternoon peak hour volumes are shown in Figure 2-16 and Figure 2-17. The Project-generated trips for the Friday p.m. peak hour are shown in Figure 2-18, and for the Saturday afternoon peak hour in Figure 2-19. The Friday p.m. “real” peak hour Project-generated trips are shown in Figure 2-20. The Build (2023) Friday p.m. and Saturday afternoon peak hour volumes, which add the updated Project-generated trips to the No Build volumes, are shown in Figure 2-21 and Figure 2-22. The Build (2023) Friday p.m. “real” peak hour volumes are shown in Figure 2-23.

2.2.3.1 MITIGATION

Sweetser Circle operates poorly at certain times of day under existing conditions. To address both current and projected future operational deficiencies at Sweetser Circle, the Proponent has consulted with MassDOT and the City of Everett on improvements of the rotary that the analyses show will effectively mitigate the Project’s impacts on Sweetser Circle. These improvements include implementing clear and recognizable pavement markings and signage to guide motorists through the rotary more efficiently, and formalizing right-turn lanes at all entrances to the rotary so that motorists may take the first exit from the rotary without needing to merge with circulating traffic. These improvements will reduce the amount of merging and diverging conflicts at the rotary, which will improve efficiency as well as significantly improving the safety of the rotary. The improvements also include accessible sidewalks along the outside of the rotary, walkways between legs of the rotary, and accessible crossings across all legs of the intersection to facilitate pedestrian access. The proposed improvements are shown in Figure 2-25A, Figure 2-25B, and Figure 2-25C show the proposed improvements at 80-scale.

2.2.3.2 BICYCLE ACCOMMODATION

In its comments on the FEIR, MassDOT noted that bicycle lanes proposed along Broadway (Route 99) would be discontinuous at Sweetser Circle. This section addresses the number of bicycle trips anticipated to be generated by the Project, bicycle connections in the area, and revised improvements at Sweetser Circle for bicyclists in

response to MassDOT's comments. These revised improvements have been developed in consultation with MassDOT.

Wynn Bicycle Trips

The Project's travel mode share analysis reported in Section 2.1.2 projected a walk/bicycle travel mode share of 3% for employees and 0% for patrons. Based on information from the City of Boston that indicates 2% of employees ride bicycles to work, the walk/bicycle share was disaggregated. Applying the 2% bicycle mode share to all Project employee trips, it is estimated that the Project will generate a total of 140 bicycle trips (two-way) on a Friday and 180 trips on a Saturday.

Bicycle Accommodations

The proposed improvements to Sweetser Circle and Lower Broadway (Route 99) will improve the safety of these areas for bicyclists.

A bicyclist traveling south on Main Street or from the Northern Strand Community Trail (NSCT) will be directed to ramp up to a shared use path on the west side of Main Street at West Street. The bicyclist will use this shared use path until s/he crosses the Route 99 Connector. After crossing the Route 99 Connector, the bicyclist will dismount their bicycle and walk on the sidewalk around the rotary until ramping down to a dedicated bicycle lane on Broadway (Route 99).

A bicyclist traveling north on Broadway (Route 99) will be directed to ramp up to the sidewalk and dismount their bicycle at the intersection of Broadway and Bow Street. From Bow Street, the bicyclist will walk on the sidewalk around the rotary until ramping down into the roadway at the intersection of Main Street and West Street.

Figure 2-25A, Figure 2-25B, and Figure 2-25C show the proposed bicycle accommodations at Sweetser Circle. The figures also reference Section 9C.04 of the *Manual on Uniform Traffic Control Devices (MUTCD)* which states that "Bicycle lanes shall not be provided on the circular roadway of a roundabout." A sign similar to the one shown on the figure, "PLEASE WALK BICYCLES ON SIDEWALKS", would therefore be required at several locations along the new bicycle route.

2.2.3.3 TRAFFIC ANALYSIS

As described in Section 2.1.3, Sweetser Circle was analyzed in the No Build (2023), Build (2023), and Build (2023) with Mitigation Conditions. That analysis, which has already been the subject of consultation with MassDOT, shows that, as a result of the improvements discussed in Section 2.2.3.1, overall operations in Sweetser Circle in the Build with Mitigation Condition will be no worse than in the No Build Condition, and in the case of seven individual movements, substantially better, demonstrating that the improvements discussed in Section 2.2.3.1 effectively mitigate the Project's traffic at these intersections.

The CASTs are provided in Table 2-22, Table 2-23, and Table 2-24 for the Friday p.m., Saturday afternoon, and Friday p.m. "real" peak hours, respectively. SIDRA and VISSIM output is provided in Appendix B.

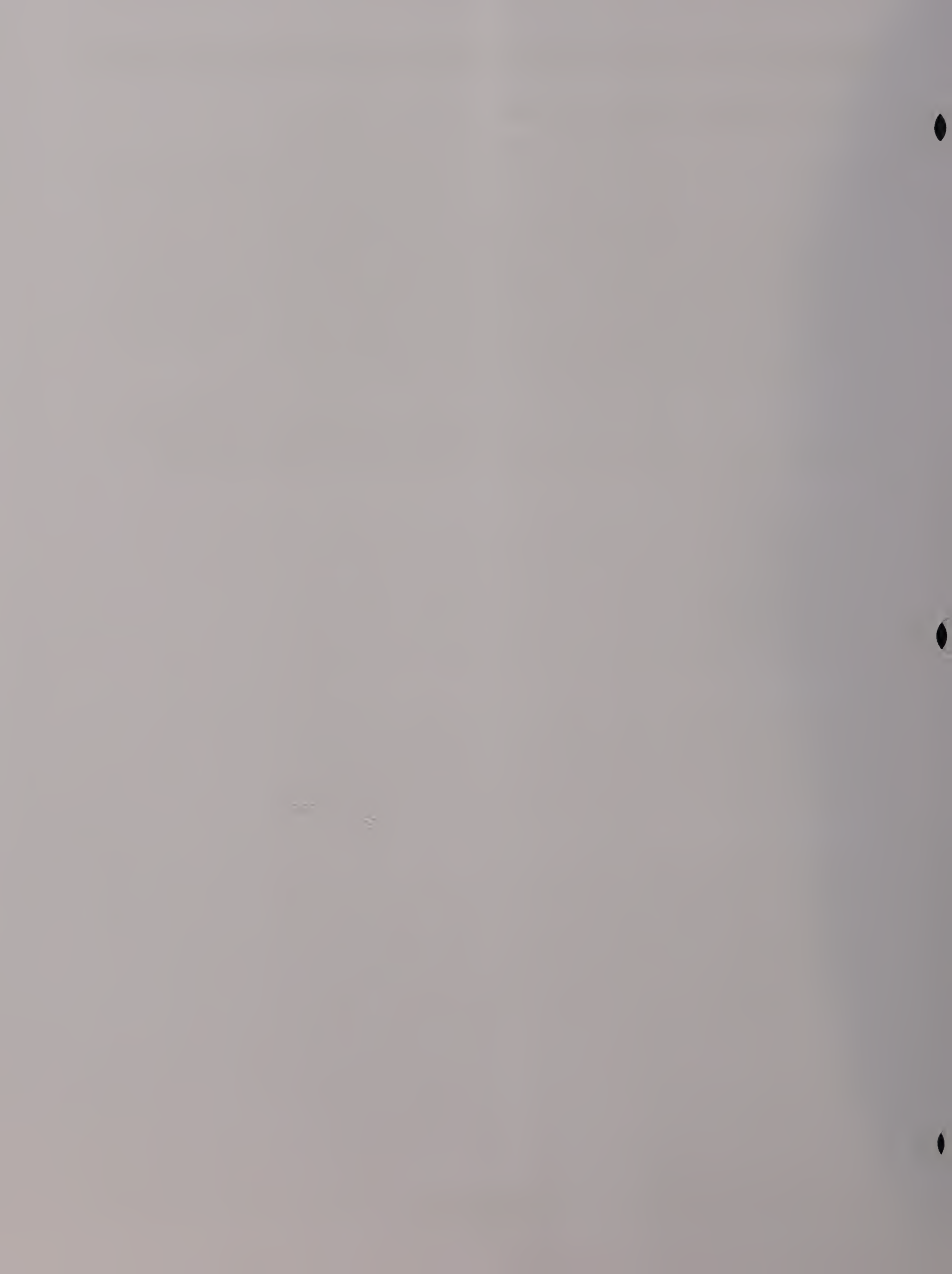


Table 2-22: Capacity Analysis Summary, Friday p.m. Peak Hour, Sweetser Circle, Boston

Intersection	Existing (2013) Conditions						No Build (2023) Conditions						Build (2023) Conditions						Build (2023) with Mitigation Conditions					
	LOS	Delay (s)	V/C	50% Queue Length (ft)	95% Queue Length (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length (ft)	95% Queue Length (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length (ft)	95% Queue Length (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length (ft)	95% Queue Length (ft)	Storage Area (ft)
11. (U) Revere Beach Parkway (Route 16/Broadway (Route 99)/Main Street (Sweetser Circle))																								
Route 16 Ramp EB	B	10.1	0.53	37	91	800	B	14.5	0.69	63	156	800	C	22.5	0.87	129	321	800	B	10.8	0.82	96	238	800
Broadway (Route 99) WB	F	87.9	1.06	192	477	>1000	F	220.1	1.40	641	1593	>1000	F	211.3	1.38	625	1554	>1000	E	37.5	0.80	41	101	>1000
Broadway (Route 99) NB	C	21.9	0.80	88	219	900	F	64.4	1.04	300	745	900	F	93.3	1.13	487	1210	900	A	8.0	0.60	33	83	900
Main SB	B	12.2	0.56	25	62	800	B	14.1	0.63	31	78	800	C	15.8	0.67	36	89	800	C	22.4	0.77	46	114	800

(U) Unsignalized

Table 2-23: Capacity Analysis Summary, Saturday Afternoon Peak Hour, Sweetser Circle, Boston

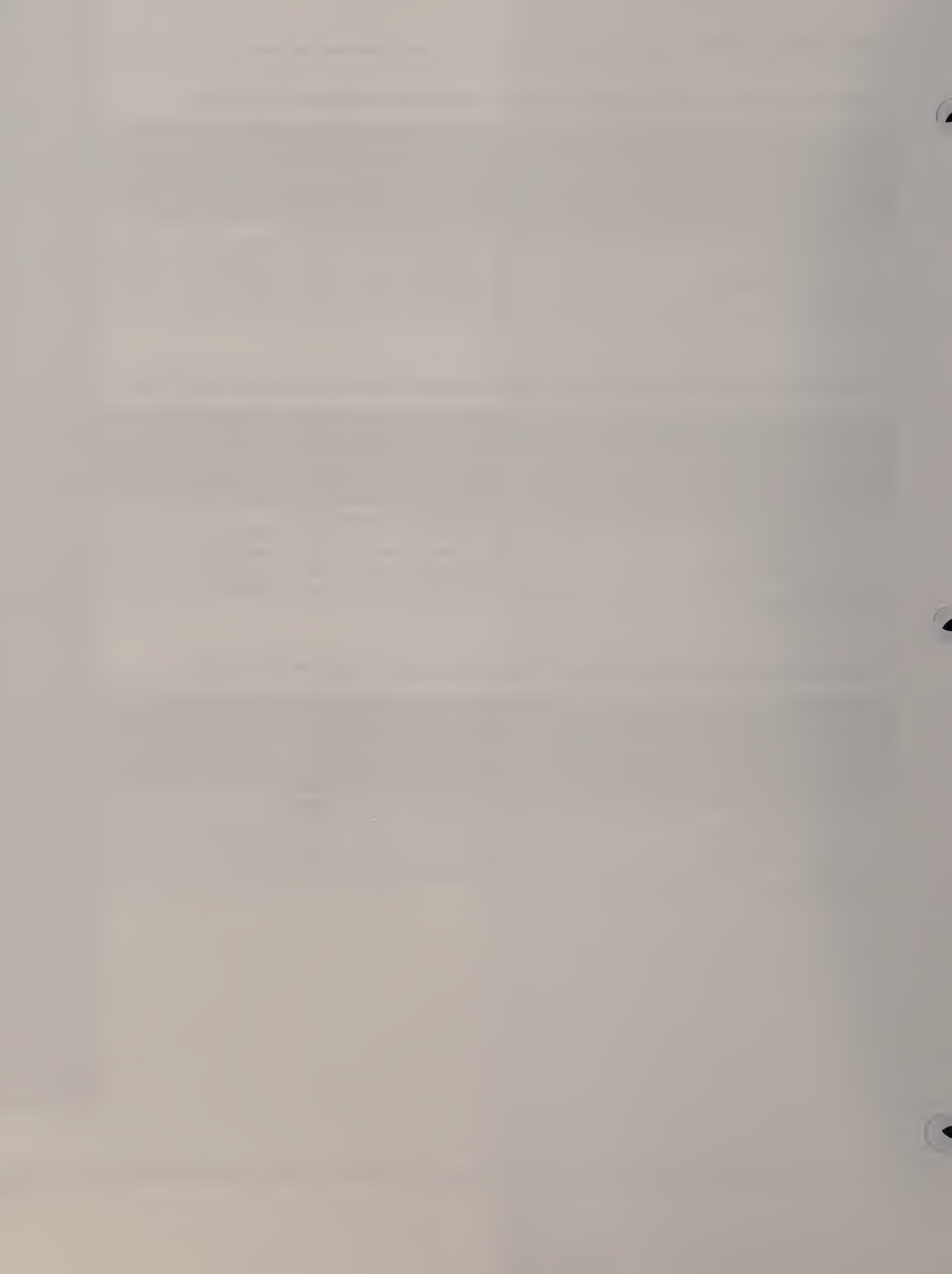
Intersection	Existing (2013) Conditions						No Build (2023) Conditions						Build (2023) Conditions						Build (2023) with Mitigation Conditions					
	LOS	Delay (s)	V/C	50% Queue Length (ft)	95% Queue Length (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length (ft)	95% Queue Length (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length (ft)	95% Queue Length (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length (ft)	95% Queue Length (ft)	Storage Area (ft)
11. (U) Revere Beach Parkway (Route 16/Broadway (Route 99)/Main Street (Sweetser Circle))																								
Route 16 Ramp EB	A	9.8	0.50	32	79	800	B	12.8	0.61	46	114	800	C	23.4	0.89	135	335	800	A	5.2	0.79	43	107	800
Broadway (Route 99) WB	D	30.9	0.84	65	162	>1000	F	75.7	1.05	230	572	>1000	F	90.6	1.09	284	707	>1000	C	16.6	0.59	25	63	>1000
Broadway (Route 99) NB	A	8.6	0.45	27	68	900	B	11.1	0.56	40	99	900	B	13.8	0.66	56	140	900	A	4.3	0.36	14	35	900
Main SB	B	12.5	0.57	27	66	800	C	16.3	0.68	36	90	800	C	18.8	0.73	42	104	800	C	22.8	0.79	50	123	800

(U) Unsignalized

Table 2-24: Capacity Analysis Summary, Friday p.m. Peak Hour, Sweetser Circle, Boston

Intersection	Existing (2013) Conditions						No Build (2023) Conditions						Build (2023) Conditions						Build (2023) with Mitigation Conditions					
	LOS	Delay (s)	V/C	50% Queue Length (ft)	95% Queue Length (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length (ft)	95% Queue Length (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length (ft)	95% Queue Length (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length (ft)	95% Queue Length (ft)	Storage Area (ft)
11. (U) Revere Beach Parkway (Route 16/Broadway (Route 99)/Main Street (Sweetser Circle))																								
Route 16 Ramp EB	B	10.1	0.53	37	91	800	B	14.5	0.69	63	156	800	C	17.2	0.75	78	193	800	B	11.3	0.81	93	231	800
Broadway (Route 99) WB	F	87.9	1.06	192	477	>1000	F	220.1	1.40	641	1593	>1000	F	210.1	1.38	616	1531	>1000	D	34.6	0.77	37	92	>1000
Broadway (Route 99) NB	C	21.9	0.80	88	219	900	F	64.4	1.04	300	745	900	F	77.1	1.08	383	952	900	A	7.9	0.59	32	79	900
Main SB	B	12.2	0.56	25	62	800	B	14.1	0.63	31	78	800	C	15.1	0.65	34	85	800	C	20.7	0.75	43	106	800

(U) Unsignalized



2.2.3.4 WEAVING ANALYSIS

During the post-FEIR collaboration with MassDOT, MassDOT requested information regarding how the weave between the Route 16 westbound off-ramp and the Route 99 connector would operate in the Build with Mitigation Condition. That information, already reviewed by MassDOT, is presented in Table 2-25 below. However, the VISSIM analysis also requested by MassDOT indicates that queuing along this approach will not be an issue in the Build with Mitigation Condition. The VISSIM output summary can be found in Appendix B.

Table 2-25: Weaving Analysis Summary, Route 16 Westbound Off-ramp/Route 99 Connector, Everett

Time Period	Existing (2013) Conditions			No-Build (2023) Conditions			Build (2023) Conditions		
	SOT	Density (pc/mi/ln)	v/c Ratio	SOT	Density (pc/mi/ln)	v/c Ratio	SOT	Density (pc/mi/ln)	v/c Ratio
Friday p.m. Peak Hour	C	20.8	0.32	C	27.2	0.40	E	35.1+	0.47
Saturday Afternoon Peak Hour	B	11.9	0.23	C	20.9	0.33	D	29.0	0.41
Friday p.m. "Real" Peak Hour	C	20.8	0.32	C	27.2	0.40	D	30.4	0.44

2.2.4 REVERE BEACH PARKWAY (ROUTE 16) INTERSECTIONS, CHELSEA

The Revere Beach Parkway (Route 16) intersections in Chelsea include:

28. Revere Beach Parkway (Route 16)/Union Street;
29. Revere Beach Parkway (Route 16)/Washington Avenue; and
30. Revere Beach Parkway (Route 16)/Webster Avenue/Garfield Avenue (again, the identifying numbers correspond to the numbering system used in the FEIR for ease of comparison).

Volume diagrams for the Existing (2013) Friday p.m. and Saturday afternoon peak hours are shown in Figure 2-26 and Figure 2-27. The No Build (2023) Friday p.m. and Saturday afternoon peak hour volumes are shown in Figure 2-28 and Figure 2-29. The Project-generated trips for the Friday p.m. peak hour are shown in Figure 2-30, and for the Saturday afternoon peak hour in Figure 2-31. The Friday p.m. "real"

peak hour Project-generated trips are shown in Figure 2-32. The Build (2023) Friday p.m. and Saturday afternoon peak hour volumes, which add the updated Project-generated trips to the No Build volumes, are shown in Figure 2-33 and Figure 2-34. The Build (2023) Friday p.m. “real” peak hour volumes are shown in Figure 2-35.

2.2.4.1 MITIGATION

At the intersection of Revere Beach Parkway (Route 16) and Washington Avenue, the Revere Beach Parkway (Route 16) eastbound and westbound through movements worsen during peak hours under existing conditions. The current traffic volumes already exceed capacity under the No Build Condition.

To address both current and projected future operational deficiencies on Revere Beach Parkway (Route 16) in this area, the Proponent has consulted with MassDOT about operational improvements the Proponent would make including updating the traffic signal phasing splits and upgrading the traffic signal equipment at the intersections of Revere Beach Parkway (Route 16) with Washington Avenue and with both Webster Avenue and Garfield Avenue.

In its comments on the FEIR, DCR expressed a concern that left-turn vehicle movements from Webster Avenue and Garfield Avenue would conflict in the center of the intersection with Revere Beach Parkway (Route 16). In response to this concern, the Proponent conducted additional evaluations, using AutoTURN modeling software, to determine potential conflicts between vehicles turning left from Webster Avenue and Garfield Avenue. These evaluations, which have been reviewed with MassDOT and DCR and are shown in Figure 2-36, demonstrate that there will no such conflicts.

2.2.4.2 TRAFFIC ANALYSIS

The analyses described in Section 2.1.3, which have already been reviewed by MassDOT, show that the proposed improvements described in Section 2.2.4.1 will effectively mitigate the impacts of Project traffic on the Revere Beach Parkway (Route 16) intersections in Chelsea as described in further detail in the following paragraphs.

Revere Beach Parkway (Route 16)/Washington Avenue

The Revere Beach Parkway (Route 16) intersections in Chelsea were analyzed in the No Build, Build (2023), and Build (2023) with Mitigation Conditions. That analysis shows that the intersection of Revere Beach

Parkway (Route 16) and Washington Avenue will operate at overall LOS F in the No Build Condition during the Friday p.m. and the Friday p.m. "real" peak hours, and overall LOS C during the Saturday afternoon peak hour.

The same analyses show that the intersection of Revere Beach Parkway (Route 16) and Washington Avenue will operate at overall LOS D in the Build with Mitigation Condition during the Friday p.m. peak hour, overall LOS E during the Friday p.m. "real" peak hour, and overall LOS C during the Saturday afternoon peak hour, demonstrating that the improvements discussed in Section 2.2.4.1 will effectively mitigate the Project's impacts on the intersection.

Revere Beach Parkway (Route 16)/Webster Avenue/Garfield Avenue

The analysis shows that the intersection of Revere Beach Parkway (Route 16) and Webster Avenue/Garfield Avenue will operate at overall LOS F in the No Build Condition during the Friday p.m. and the Friday p.m. "real" peak hours, and overall LOS E during the Saturday afternoon peak hour.

In the Build with Mitigation Condition, the intersection of Revere Beach Parkway (Route 16) and Webster Avenue/Garfield Avenue will continue to operate at LOS F during the Friday p.m. and Friday p.m. "real" peak hours, but with slightly less delay than the No Build Condition. The intersection will operate at LOS E in the Saturday afternoon peak hour but with slightly less delay than in the No Build Condition, demonstrating that the proposed improvements will effectively mitigate the Project's impacts on the intersection.

The CASTs are provided in Table 2-26, Table 2-27, and Table 2-28 for the Friday p.m., Saturday afternoon, and Friday p.m. "real" peak hours, respectively. Synchro output is provided in Appendix B.

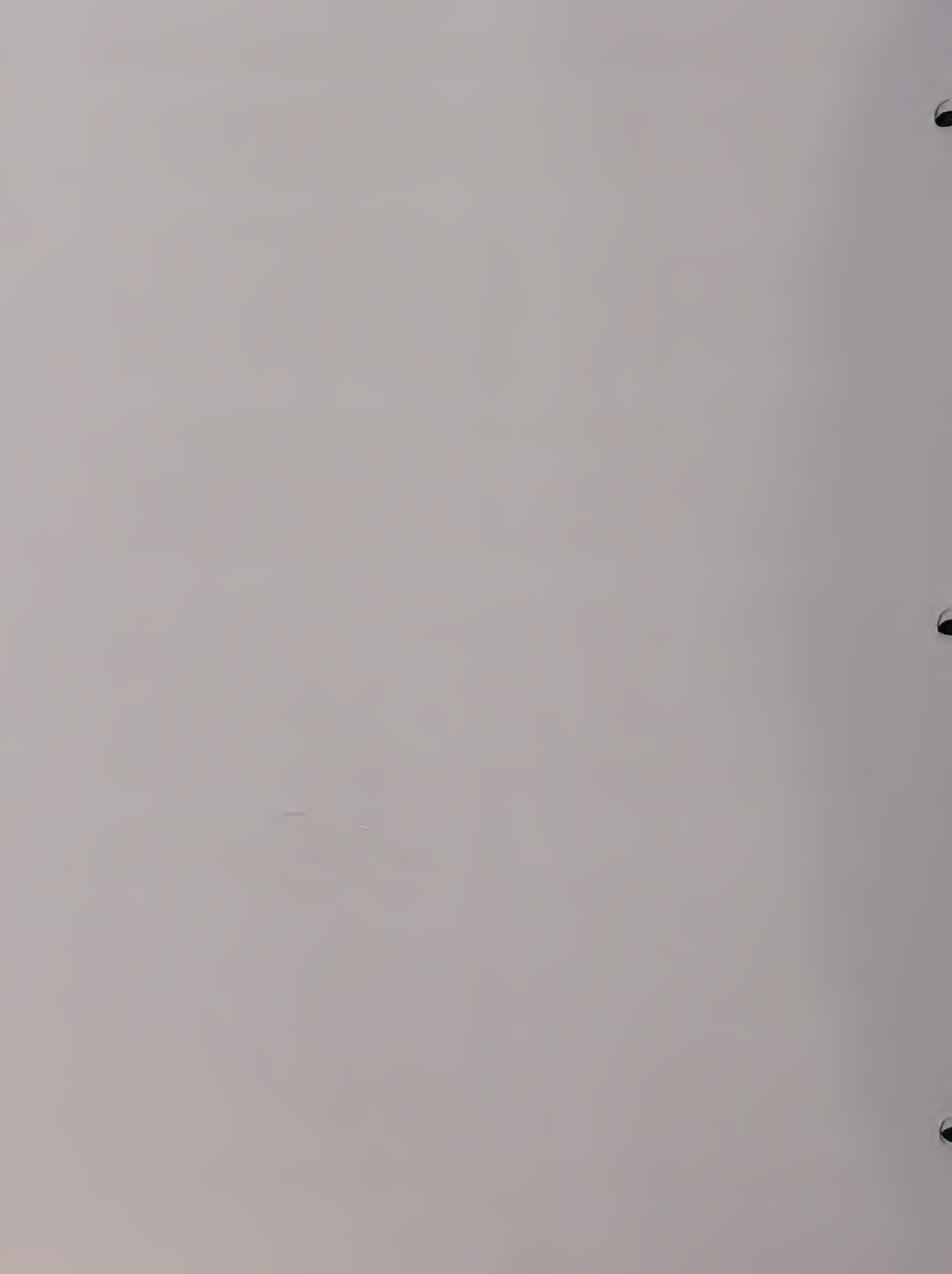


Table 2-26: Capacity Analysis Summary, Friday p.m. Peak Hour, Route 16 Intersections, Chelsea

Intersection	Existing (2014) Conditions						No Build (2023) Conditions						Build (2023) Conditions						Build (2023) with Mitigation Conditions					
	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)
28. (S) Revere Beach Parkway (Route 16)/ Union Street	A	4.1	0.44	--	--	--	A	4.5	0.52	--	--	--	A	4.6	0.54	--	--	--	A	4.3	0.54	--	--	--
Route 16 EB thru thru thru	A	3.2	0.44	112	204	>1000	A	3.8	0.52	243	310	>1000	A	3.9	0.55	253	283	>1000	A	3.9	0.55	220	318	>1000
Route 16 WB thru thru thru	A	1.5	0.35	100	100	385	A	1.9	0.41	73	147	385	A	2.3	0.44	77	137	385	A	1.4	0.44	57	137	385
Route 16 WB bear right	A	0.9	0.11	37	37	200	A	0.6	0.13	21	65	200	A	0.4	0.13	15	43	200	A	0.2	0.13	17	70	200
Union SEB left left	D	48.5	0.45	120	120	900	D	48.5	0.49	100	128	900	D	48.5	0.49	103	134	900	D	48.5	0.49	96	135	900
Union SEB hard right	D	46.4	0.00	5	31	55	D	46.0	0.00	0	8	55	D	46.0	0.00	130	211	55	D	46.0	0.00	0	8	55
29. (S) Revere Beach Parkway (Route 16)/ Washington Avenue	C	34.8	0.70	--	--	--	F	91.5	0.81	--	--	--	F	111.5	0.83	--	--	--	D	60.8	0.87	--	--	--
Route 16 EB left	D	49.1	0.80	107	120	100	E	79.1	0.97	107	118	100	F	87.9	1.00	108	118	100	F	157.7	1.19	108	122	100
Route 16 EB thru thru thru/right	C	28.5	0.81	184	229	375	F	99.7	1.13	186	211	375	F	122.1	1.19	188	200	375	E	60.7	1.05	187	202	375
Route 16 WB left	D	52.4	0.64	74	154	130	F	80.5	0.85	82	168	130	F	95.7	0.91	73	160	130	F	140.2	1.04	96	184	130
Route 16 WB thru thru thru/right	D	37.8	0.82	185	360	>1000	F	116.9	1.15	199	360	>1000	F	144.3	1.22	213	384	>1000	D	51.5	0.97	253	456	>1000
Washington NB left/thru thru/right	D	35.6	0.54	128	185	375	C	27.7	0.42	132	184	375	C	27.4	0.43	133	187	375	C	31.1	0.50	131	185	375
Washington SB left/thru	D	35.3	0.52	90	126	270	C	28.6	0.49	99	124	270	C	28.1	0.48	91	125	270	C	32.6	0.57	93	127	270
Washington SB right	C	33.3	0.34	52	104	270	C	26.6	0.32	55	111	270	C	26.1	0.31	61	119	270	C	29.4	0.35	62	116	270
30. (S) Revere Beach Parkway (Route 16)/ Webster Avenue	F	91.8	1.40	--	--	--	F	113.1	1.62	--	--	--	F	118.1	1.65	--	--	--	F	96.4	1.13	--	--	--
Route 16 EB thru thru thru/right	D	49.8	0.87	262	337	>1000	F	88.3	1.06	277	321	>1000	F	106.8	1.11	281	307	>1000	F	125.9	1.15	281	281	>1000
Route 16 WB left	F	176.0	1.18	470	480	120	F	221.0	1.30	471	474	120	F	221.0	1.30	471	476	120	F	174.4	1.18	468	468	120
Route 16 WB thru thru thru/right	C	22.1	0.59	402	659	600	C	24.0	0.68	381	674	600	C	24.9	0.71	401	659	600	C	25.8	0.70	319	319	600
Webster NB left **	F	162.1	1.16	367	751	275	F	181.4	1.21	424	781	275	F	181.4	1.21	482	806	275	F	106.7	1.00	472	472	275
Webster NB thru/right	E	61.6	0.83	540	735	275	E	64.2	0.86	574	713	275	E	64.2	0.86	609	641	275	F	171.6	1.20	611	611	275
Garfield SB left**	F	973.7	2.94	100	114	265	F	1185.3	3.40	152	38	265	F	1185.3	3.40	99	113	265	F	161.5	1.12	88	88	265
Garfield SB thru/right	E	75.9	0.84	88	157	280	E	79.3	0.86	90	152	280	E	79.3	0.86	87	157	280	F	98.6	0.94	111	111	280

1. Queue shown is the longest reported average for the movement/approach. Queues derived from average of five SimTraffic simulations.

(S) signalized intersection (U) unsignalized intersection

* Indicates that lane was added as part of Build – Mitigated condition. [] indicates that lane/movement was removed as part of Build – Mitigated condition.

** de facto turning lane

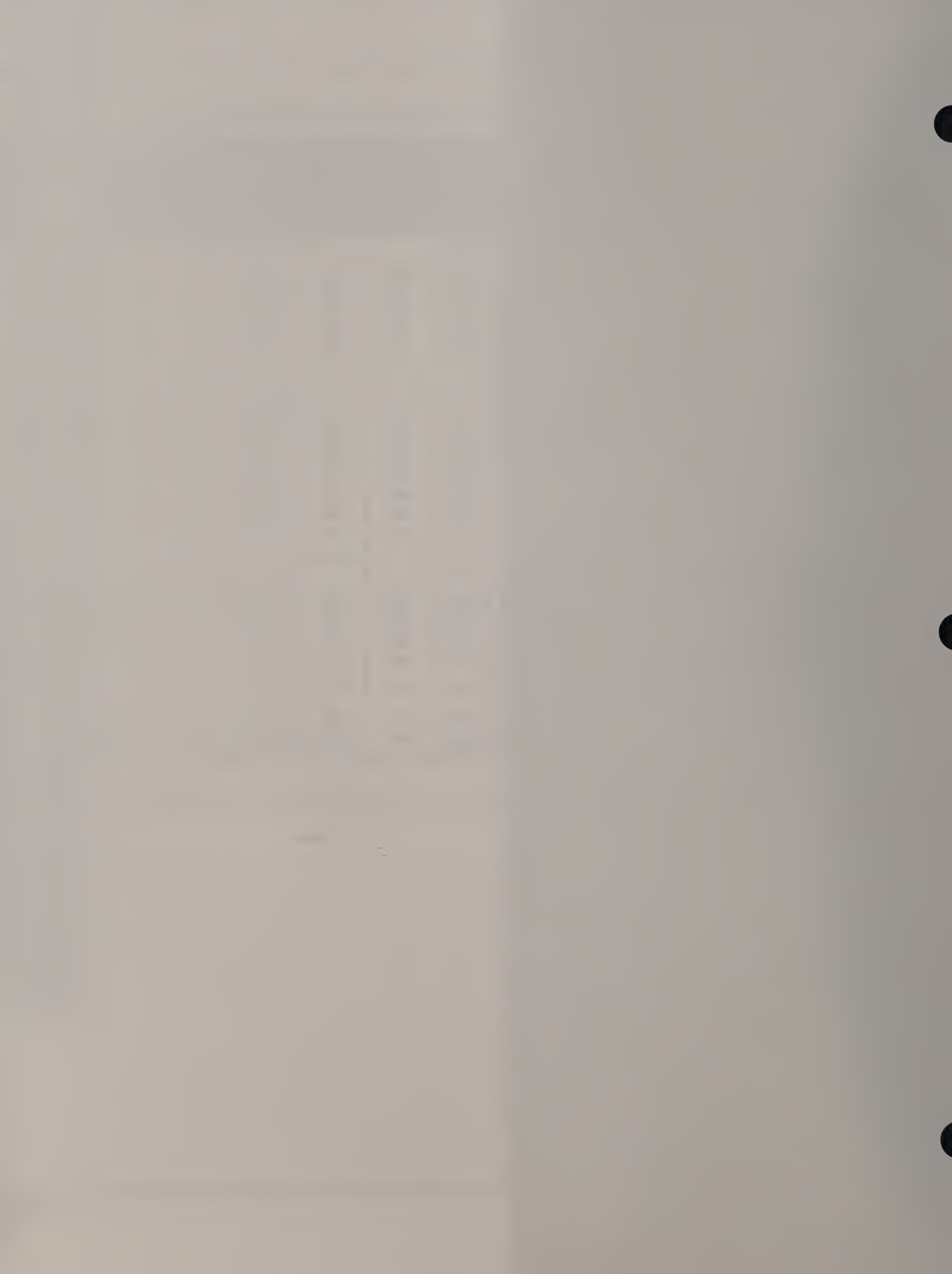


Table 2-27: Capacity Analysis Summary, Saturday Afternoon Peak Hour, Route 16 Intersections, Chelsea

Intersection	Existing (2014) Conditions						No Build (2023) Conditions						Build (2023) Conditions						Build (2023) with Mitigation Conditions					
	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)
28. (S) Revere Beach Parkway (Route 16)/ Union Street	A	5.1	0.47	-	-	-	A	5.3	0.51	-	-	-	A	5.5	0.54	-	-	-	A	5.5	0.51	-	-	-
Route 16 EB thru thru thru	A	4.2	0.46	115	193	>1000	A	4.6	0.53	142	242	>1000	A	4.8	0.56	152	258	>1000	A	4.6	0.53	134	223	>1000
Route 16 WB thru thru thru	A	4.3	0.48	83	177	385	A	4.6	0.51	90	164	385	A	4.8	0.54	104	227	385	A	4.5	0.52	96	215	385
Route 16 WB bear right	A	3.0	0.13	33	101	200	A	3.1	0.14	34	97	200	A	3.1	0.14	41	128	200	A	3.0	0.14	39	128	200
Union SEB left left	C	25.3	0.35	49	84	900	C	25.3	0.40	56	101	900	C	25.3	0.40	58	102	900	C	32.3	0.39	63	113	900
Union SEB hard right	C	24.1	0.00	0	8	55	C	24.0	0.01	2	24	55	C	24.1	0.02	4	27	55	C	30.7	0.00	4	27	55
29. (S) Revere Beach Parkway (Route 16)/ Washington Avenue	C	29.9	0.68	-	-	-	C	33.2	0.75	-	-	-	C	34.2	0.78	-	-	-	C	34.0	0.77	-	-	-
Route 16 EB left	E	58.0	0.77	103	126	100	E	75.8	0.87	105	124	100	F	80.6	0.89	105	122	100	E	68.2	0.83	104	126	100
Route 16 EB thru thru thru/right	C	20.5	0.63	180	217	375	C	22.9	0.72	183	203	375	C	23.3	0.75	182	220	375	C	23.5	0.76	185	225	375
Route 16 WB left	D	54.5	0.56	50	128	130	E	59.2	0.60	53	128	130	E	60.6	0.60	44	108	130	E	65.8	0.68	59	206	130
Route 16 WB thru thru thru/right	C	28.3	0.72	168	332	>1000	C	29.6	0.75	193	356	>1000	C	29.8	0.77	191	372	>1000	C	32.7	0.82	246	448	>1000
Washington NB left/thru thru/right	D	54.7	0.65	134	193	375	D	52.4	0.74	142	190	375	E	57.6	0.88dl	146	187	375	D	52.3	0.73	142	193	375
Washington SB left/thru	D	46.3	0.65	92	122	270	E	57.4	0.78	92	125	270	E	65.1	0.83	92	125	270	E	55.5	0.76	94	123	270
Washington SB right	D	40.7	0.38	55	110	270	D	43.0	0.41	51	109	270	D	44.2	0.42	49	106	270	D	42.8	0.40	56	107	270
30. (S) Revere Beach Parkway (Route 16)/ Webster Avenue	E	66.9	1.08	-	-	-	E	78.8	1.18	-	-	-	F	80.1	1.20	-	-	-	E	73.0	1.02	-	-	-
Route 16 EB thru thru thru/right	D	47.3	0.83	247	339	>1000	D	52.3	0.90	253	348	>1000	E	59.5	0.96	269	335	>1000	E	75.4	1.01	273	333	>1000
Route 16 WB left	F	174.2	1.18	467	515	120	F	202.	1.25	471	474	120	F	202.3	1.25	471	475	120	F	120.4	1.03	437	558	120
Route 16 WB thru thru thru/right	C	25.0	0.71	425	633	600	C	326.6	0.76	395	664	600	C	28.1	0.80	381	670	600	C	27.2	0.78	340	623	600
Webster NB left **	F	267.2	1.43	444	727	275	F	327.3	1.57	488	735	275	F	327.3	1.57	529	757	275	F	134.9	1.11	563	737	275
Webster NB thru/right	D	49.9	0.62	358	681	275	D	52.8	0.68	416	722	275	D	52.8	0.68	477	787	275	F	131.9	1.07	597	663	275
Garfield SB left**	F	189.2	1.19	100	111	265	F	312.4	1.48	100	108	265	F	312.4	1.48	99	110	265	F	132.4	1.04	89	125	265
Garfield SB thru/right	E	71.3	0.80	104	154	280	E	72.1	0.80	105	151	280	E	72.1	0.80	107	147	280	F	152.9	1.11	111	141	280

1. Queue shown is the longest reported average for the movement/approach. Queues derived from average of five SimTraffic simulations.

(S) signalized intersection (U) unsignalized intersection

* Indicates that lane was added as part of Build – Mitigated condition. □ indicates that lane/movement was removed as part of Build – Mitigated condition.

** de facto turning lane

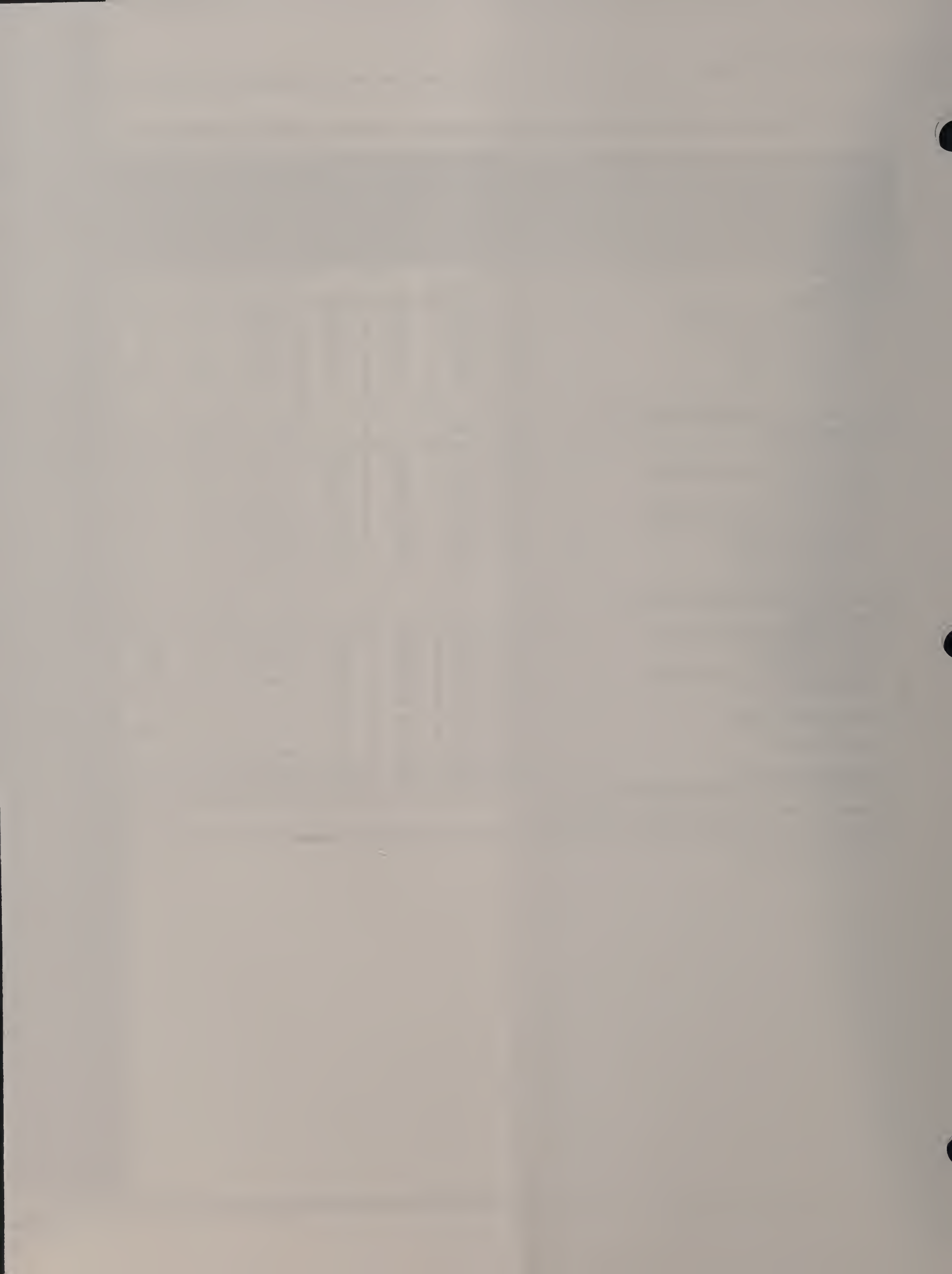


Table 2-28: Capacity Analysis Summary, Friday p.m. "Real" Peak Hour, Route 16 Intersections, Chelsea

Intersection	Existing (2014) Conditions						No Build (2023) Conditions						Build (2023) Conditions						Build (2023) with Mitigation Conditions					
	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)
28. (S) Revere Beach Parkway (Route 16)/ Union Street	A	4.1	0.44	–	–	–	A	4.5	0.52	–	–	–	A	4.6	0.53	–	–	–	A	4.1	0.57	–	–	–
Route 16 EB thru thru thru	A	3.2	0.44	112	204	>1000	A	3.8	0.52	243	310	>1000	A	3.9	0.54	254	286	>1000	A	4.6	0.58	255	268	>1000
Route 16 WB thru thru thru	A	1.5	0.35	100	100	385	A	1.9	0.41	73	147	385	A	2.1	0.43	80	145	385	A	1.4	0.47	51	114	385
Route 16 WB bear right	A	0.9	0.11	37	37	200	A	0.6	0.13	21	65	200	A	0.5	0.13	18	46	200	A	1.4	0.13	15	48	200
Union SEB left left	D	48.5	0.45	120	120	900	D	48.5	0.49	100	128	900	D	48.5	0.49	104	140	900	C	30.2	0.44	102	138	900
Union SEB hard right	D	46.4	0.00	5	31	55	D	46.0	0.00	0	8	55	D	46.0	0.00	0	8	55	C	28.6	0.00	74	152	55
29. (S) Revere Beach Parkway (Route 16)/ Washington Avenue	C	34.8	0.70	–	–	–	F	91.5	0.81	–	–	–	F	102.9	0.82	–	–	–	E	71.3	0.93	–	–	–
Route 16 EB left	D	49.1	0.80	107	120	100	E	79.1	0.97	107	118	100	F	83.9	0.98	107	118	100	F	113.9	1.02	109	117	100
Route 16 EB thru thru thru/right	C	28.5	0.81	184	229	375	F	99.7	1.13	186	211	375	F	112.7	1.16	187	205	375	E	74.6	1.06	188	194	375
Route 16 WB left	D	52.4	0.64	74	154	130	F	80.5	0.85	82	168	130	F	87.5	0.88	79	163	130	F	92.6	0.84	79	165	130
Route 16 WB thru thru thru/right	D	37.8	0.82	185	360	>1000	F	116.9	1.15	199	360	>1000	F	132.3	1.19	215	382	>1000	E	70.8	1.00	192	381	>1000
Washington NB left/thru thru/right	D	35.6	0.54	128	185	375	C	27.7	0.42	132	184	375	C	27.6	0.43	132	185	375	D	53.6	0.80	156	186	375
Washington SB left/thru	D	35.3	0.52	90	126	270	C	28.6	0.49	99	124	270	C	28.4	0.49	95	133	270	D	40.8	0.57	101	129	270
Washington SB right	C	33.3	0.34	52	104	270	C	26.6	0.32	55	111	270	C	26.3	0.31	61	113	270	D	36.1	0.34	60	117	270
30. (S) Revere Beach Parkway (Route 16)/ Webster Avenue	F	91.8	1.40	–	–	–	F	113.1	1.62	–	–	–	F	115.8	1.64	–	–	–	F	96.0	1.12	–	–	–
Route 16 EB thru thru thru/right	D	49.8	0.87	262	337	>1000	F	88.3	1.06	277	321	>1000	F	98.6	1.09	277	319	>1000	D	51.2	0.94	231	372	>1000
Route 16 WB left	F	176.0	1.18	470	480	120	F	221.0	1.30	471	474	120	F	221.0	1.30	470	486	120	F	209.6	1.27	471	476	120
Route 16 WB thru thru thru/right	C	22.1	0.59	402	659	600	C	24.0	0.68	381	674	600	C	24.5	0.69	389	664	600	B	18.0	0.63	471	627	600
Webster NB left **	F	162.1	1.16	367	751	275	F	181.4	1.21	424	781	275	F	181.4	1.21	373	731	275	F	179.6	1.20	560	788	275
Webster NB thru/right	E	61.6	0.83	540	735	275	E	64.2	0.86	574	713	275	E	64.2	0.86	537	734	275	F	304.1	1.51	609	622	275
Garfield SB left**	F	973.7	2.94	100	114	265	F	1185.3	3.40	152	38	265	F	1185.3	3.40	101	117	265	F	259.2	1.36	99	126	265
Garfield SB thru/right	E	75.9	0.84	88	157	280	E	79.3	0.86	90	152	280	E	79.3	0.86	95	154	280	F	207.3	1.26	114	131	280

1. Queue shown is the longest reported average for the movement/approach. Queues derived from average of five SimTraffic simulations.
 (S) signalized intersection (U) unsignalized intersection
 * Indicates that lane was added as part of Build – Mitigated condition. □ indicates that lane/movement was removed as part of Build – Mitigated condition.
 ** de facto turning lane



DCR requested details of the proposed timing adjustments on Revere Beach Parkway (Route 16). Table 2-29 shows the timing changes for Friday at Revere Beach Parkway (Route 16)/Washington Avenue. Table 2-30 shows the proposed signal timing changes for Saturday.

Table 2-31 shows the timing changes for the Friday p.m. peak hour at Revere Beach Parkway (Route 16)/Webster Avenue/Garfield Avenue. Table 2-32 shows the proposed signal timing changes for the Saturday afternoon peak hour.

Table 2-29: Signal Timing Adjustment Summary, Friday, Revere Beach Parkway (Route 16)/Washington Avenue, Chelsea

Lane Group	Existing Conditions					Build Mitigated Conditions				
	Phase	Min Green	Max Green	Yellow	All Red	Phase	Min Green	Max Green	Yellow	All Red
EB Left	1	5	19	5	1	1	5	17	3	1
EB Thru/Right	6	12	43	4	1	6	12	39	4	1
WB Left	5	5	8	7	1	5	5	8	3	1
WB Thru/Right	2	12	32	4	1	2	12	30	4	1
NB Left/Thru/Right	4	12	17	4	1	4	12	21	4	1
SB Left/Thru	8	12	17	4	1	8	12	21	4	1
SB Right	8	12	17	4	1	8	12	21	4	1

Table 2-30: Signal Timing Adjustment Summary, Saturday, Revere Beach Parkway (Route 16)/Washington Avenue, Chelsea

Lane Group	Existing Conditions					Build Mitigated Conditions				
	Phase	Min Green	Max Green	Yellow	All Red	Phase	Min Green	Max Green	Yellow	All Red
EB Left	1	9	20	3	1	1	9	22	3	1
EB Thru/Right	6	45	65	4	1	6	45	67	4	1
WB Left	5	7	15	3	1	5	8	10	3	1
WB Thru/Right	2	7	60	4	1	2	15	55	4	1
NB Left/Thru/Right	4	12	25	4	1	4	12	28	4	1
SB Left/Thru	8	12	25	4	1	8	12	28	4	1
SB Right	8	12	25	4	1	8	12	28	4	1

Table 2-31: Signal Timing Adjustment Summary, Friday, Revere Beach Parkway (Route 16)/Webster Avenue/Garfield Avenue, Chelsea

Lane Group	Existing Conditions					Build Mitigated Conditions				
	Phase	Min Green	Max Green	Yellow	All Red	Phase	Min Green	Max Green	Yellow	All Red
EB Left/Thru/Right	2	15	55	5	1	2	15	56	5	1
WB Left	1	8	25	4	1	1	8	29	4	1
WB Thru/Right	6	15	85	5	1	6	15	90	5	1
NB Left	7	5	10	4	1	7	10	14	4	1
NB Thru/Right	4	10	45	5	1	4	10	34	5	1
SB Left	8	10	30	5	1	3	4	9	4	1
SB Thru/Right	8	10	30	5	1	8	10	29	5	1

Table 2-32: Signal Timing Adjustment Summary, Saturday, Revere Beach Parkway (Route 16)/ Webster Avenue/Garfield Avenue, Chelsea

Lane Group	Existing Conditions					Build Mitigated Conditions				
	Phase	Min Green	Max Green	Yellow	All Red	Phase	Min Green	Max Green	Yellow	All Red
EB left/Thru/right	2	15	55	5	1	2	15	55	5	1
WB Left	1	8	25	4	1	1	8	18	4	1
WB Thru/Right	6	15	85	5	1	6	15	92	5	1
NB Left	7	5	10	4	1	7	5	18	4	1
NB Thru/Right	4	10	45	5	1	4	10	30	5	1
SB Left	8	10	30	5	1	3	4	11	4	1
SB Thru/Right	8	10	30	5	1	8	10	23	5	1

2.2.5 BELL CIRCLE, REVERE

Bell Circle is a rotary at the intersection of Revere Beach Parkway (Route 16), Everett Street, and Route 1A. Based on the analyses described in Section 2.1.3, it is not expected to experience significant impacts as a result of Project traffic.

Volume diagrams for the Existing (2013) Friday p.m. and Saturday afternoon peak hours are shown in Figure 2-37 and Figure 2-38. The No Build (2023) Friday p.m. and Saturday afternoon peak hour volumes are shown in Figure 2-39 and Figure 2-40. The Project-generated trips for the Friday p.m. peak hour are shown in Figure 2-41, and for the Saturday afternoon peak hour in Figure 2-42. The Friday p.m. "real" peak hour Project-generated trips are shown in Figure 2-43. The Build (2023) Friday p.m. and Saturday afternoon peak hour volumes, which add the updated Project-generated trips to the No Build volumes, are shown in Figure 2-44 and Figure 2-45. The Build (2023) Friday p.m. "real" peak hour volumes are shown in Figure 2-46.

2.2.5.1 MITIGATION

In order to improve operating conditions, reduce vehicle queuing and improve safety within Bell Circle, the Proponent has consulted with MassDOT on a plan whereby traffic signal timing and phasing will be optimized. All signs and pavement markings within and approaching Bell Circle will be reviewed, upgraded, and supplemented as necessary to improve traffic operations, motorist guidance, and safety for all roadway users.

2.2.5.2 TRAFFIC ANALYSIS

The analyses described in Section 2.1.3, already reviewed by MassDOT, show that traffic operations at this intersection will experience minimal impacts as a result of Project traffic and will be modestly improved by the Proponent's planned signal, signage, and pavement improvement measures described in Section 2.2.5.1. The CASTs for the Friday p.m., Saturday afternoon, and Friday p.m. "real" peak hours provided in Table 2-33, Table 2-34, and Table 2-35.



Table 2-33: Capacity Analysis Summary, Friday p.m. Peak Hour, Bell Circle, Revere

Intersection	Existing (2013) Conditions						No Build (2023) Conditions						Build (2023) Conditions						Build (2023) with Mitigation Conditions					
	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)
32. Beach Street/Everett Street/Route 1A/Route 16 (Bell Circle)																								
(S) Eastern Intersection																								
Beach WB right right	C	31.9	0.36	0	52	>800	D	41.1	0.78	104	#273	>800	E	64.9	0.70	-	-	-	E	74.7	0.71	-	-	-
Rotary NB thru thru (continue in rotary)	B	14.4	0.12	0	m0	210	B	14.4	0.13	0	m0	210	D	41.7	0.79	109	#279	>800	D	51.4	0.84	135	#311	>800
Rotary NB right right (onto Beach EB)	F	104.6	0.57	89	m38	160	F	93.4	0.68	121	m43	160	B	14.4	0.13	0	m0	210	B	13.2	0.13	0	m0	210
							F	90.8	0.69	120	m43	160	F	90.8	0.69	120	m43	160	F	103.1	0.69	131	m93	160
(S) Western Intersection																								
Beach EB right	A	0.4	0.27	0	0	>800	A	0.5	0.30	0	0	>800	A	0.5	0.30	0	0	>800	A	0.5	0.30	0	0	>800
Rotary SB thru thru (continue in rotary)	A	0.6	0.36	0	8	130	A	0.4	0.42	5	m6	130	A	0.4	0.42	5	m6	130	A	0.3	0.42	5	m5	130
Rotary SB right (onto Beach WB)	A	0.6	0.44	7	0	120	A	0.4	0.42	0	m0	120	A	0.4	0.42	0	0	120	A	0.3	0.42	0	m0	120
(S) Northern Intersection																								
Rotary WB thru thru	C	26.6	0.80	350	452	140	D	35.9	0.96	476	m#632	140	D	36.8	0.96	480	m#634	140	E	67.2	1.06	~613	m#722	140
Rotary WB right	B	18.4	0.38	98	152	160	B	15.7	0.42	90	m113	160	B	15.6	0.42	90	m112	160	B	19.7	0.47	110	m136	160
Route 60 NB thru thru	A	0.1	0.61	0	m0	220	A	0.1	0.65	0	m0	220	A	0.1	0.65	0	m0	220	A	0.0	0.60	0	m0	220
Route 60 SB thru thru	C	25.5	0.59	209	272	>800	C	27.7	0.69	256	328	>800	C	27.7	0.69	256	328	>800	C	24.4	0.61	256	323	>800
Route 60 SB right (onto rotary)	C	26.4	0.55	141	244	>800	C	29.1	0.64	181	303	>800	C	29.1	0.64	181	274	>800	C	25.8	0.59	189	304	>800
(S) Southern Intersection																								
Rotary EB thru thru	C	31.3	0.76	176	243	140	D	37.1	0.86	205	#325	140	D	37.2	0.86	243	#380	140	D	53.6	0.95	243	#380	140
Rotary EB right right (onto 1A SB)	B	19.2	0.70	140	221	190	C	26.7	0.87	209	#398	190	C	27.1	0.88	138	#323	190	E	58.6	0.56	138	#323	190
Route 1A NB right right (towards rotary)	B	17.6	0.76	130	183	>800	B	19.0	0.56	176	240	>800	B	19.1	0.57	218	286	>800	C	25.5	0.56	218	286	>800
Route 60 SB thru thru	A	31.1	0.63	50	56	220	A	5.3	0.73	67	75	220	A	5.3	0.73	18	8	220	A	1.1	0.57	18	8	220
Route 60 NEB thru thru/right	F	206.7	1.38	~801	#937	>800	F	269.8	1.52	~969	#1065	>800	F	269.8	1.52	~929	#1065	>800	F	149.1	1.25	~917	#1053	>800

1. Queue shown is the longest reported average for the movement/approach. Queues derived from average of five SimTraffic simulations.

(S) signalized intersection (U) unsignalized intersection

* Indicates that lane was added as part of Build – Mitigated condition. [] indicates that lane/movement was removed as part of Build – Mitigated condition.

~ Volume exceeds capacity, queue is theoretically infinite. Queue shown is maximum after two cycles.

95th percentile volume exceeds capacity. Queue may be longer. Queue shown is maximum after two cycles.

m Volume for 95th percentile queue is metered by an upstream signal.

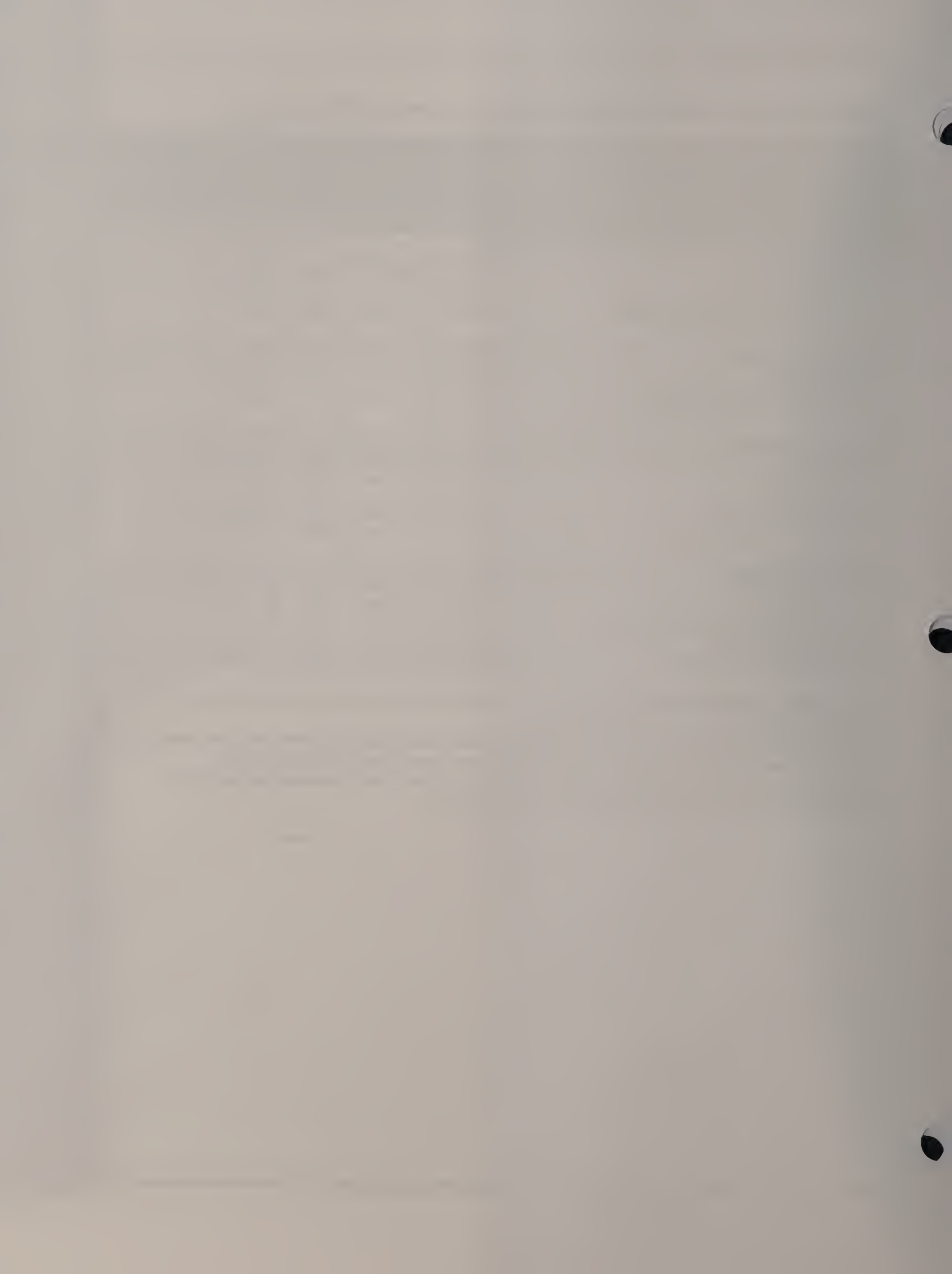


Table 2-34: Capacity Analysis Summary, Saturday Afternoon Peak Hour, Bell Circle, Reverse

Intersection	Existing (2013) Conditions						No Build (2023) Conditions						Build (2023) Conditions						Build (2023) with Mitigation Conditions					
	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)
32. Beach Street/Everett Street/Route 1A/Route 16 (Bell Circle)																								
(S) Eastern Intersection																								
	D	41.5		–	–	–	E	63.0		–	–	–	E	62.4	0.64	–	–	–	E	66.9	0.64	–	–	–
Beach WB right right	C	34.3	0.55	39	122	>800	D	54.1	0.92	164	#351	>800	E	56.9	0.93	171	#360	>800	E	57.2	0.93	172	#360	>800
Rotary NB thru thru (continue in rotary)	B	14.4	0.13	0	m0	210	B	14.5	0.14	0	m0	210	B	14.5	0.14	0	m0	210	B	14.5	0.14	0	m0	210
Rotary NB right right (onto Beach EB)	C	56.3	0.44	43	m30	160	F	84.2	0.53	63	m36	160	F	80.5	0.53	63	m36	160	F	89.8	0.53	63	m39	160
(S) Western Intersection																								
	A	0.3		–	–	–	A	0.3		–	–	–	A	0.3	0.55	–	–	–	A	0.3	0.55	–	–	–
Beach EB right	A	0.3	0.21	0	0	>800	A	0.3	0.23	0	0	>800	A	0.3	0.23	0	0	>800	A	0.3	0.23	0	0	>800
Rotary SB thru thru (continue in rotary)	A	0.4	0.37	4	4	130	A	0.3	0.45	4	m4	130	A	0.3	0.46	4	m4	130	A	0.3	0.46	4	m4	130
Rotary SB right (onto Beach WB)	A	0.2	0.19	0	m0	120	A	0.2	0.22	0	m0	120	A	0.2	0.22	0	m0	120	A	0.2	0.22	0	m0	120
(S) Northern Intersection																								
	B	17.4		–	–	–	B	20.0		–	–	–	C	20.1	0.97	–	–	–	C	20.2	0.97	–	–	–
Rotary WB thru thru	C	24.7	0.78	341	438	140	C	29.8	0.93	452	m511	140	C	30.2	0.94	457	m511	140	C	30.4	0.94	457	m513	140
Rotary WB right	B	17.3	0.44	107	m152	160	B	14.9	0.49	97	m118	160	B	14.5	0.49	96	m117	160	B	14.6	0.49	96	m118	160
Route 60 NB thru thru	A	0.1	0.61	0	m0	220	A	0.1	0.63	0	m0	220	A	0.1	0.63	0	m0	220	A	0.1	0.63	0	m0	220
Route 60 SB thru thru	C	26.2	0.63	233	300	>800	C	28.4	0.72	277	353	>800	C	28.4	0.72	277	353	>800	C	28.4	0.72	277	353	>800
Route 60 SB right (onto rotary)	C	21.8	0.31	56	122	>800	C	22.7	0.37	74	148	>800	C	22.7	0.37	74	148	>800	C	22.7	0.37	74	148	>800
(S) Southern Intersection																								
	C	79.9		–	–	–	F	85.6		–	–	–	F	84.7	1.35	–	–	–	E	68.9	1.26	–	–	–
Rotary EB thru thru	C	22.9	0.57	108	159	140	C	26.1	0.66	130	195	140	C	26.1	0.66	131	195	140	C	26.1	0.66	130	195	140
Rotary EB right right (onto 1A SB)	B	18.9	0.81	121	215	190	D	39.8	0.99	173	#578	190	D	35.0	0.97	173	#571	190	C	26.0	0.91	144	#521	190
Route 1A NB right right (towards rotary)	B	19.3	0.43	113	157	>800	B	18.0	0.49	140	198	>800	C	21.0	0.54	144	201	>800	B	19.9	0.46	148	203	>800
Route 60 SB thru thru	A	3.6	0.67	58	64	220	A	6.0	0.76	74	81	220	A	6.0	0.76	74	81	220	A	1.5	0.64	20	9	220
Route 60 NEB thru thru/right	F	191.3	1.35	~760	#865	>800	F	205.6	1.38	~790	#925	>800	F	205.6	1.38	~790	#925	>800	F	168.3	1.30	~761	#896	>800

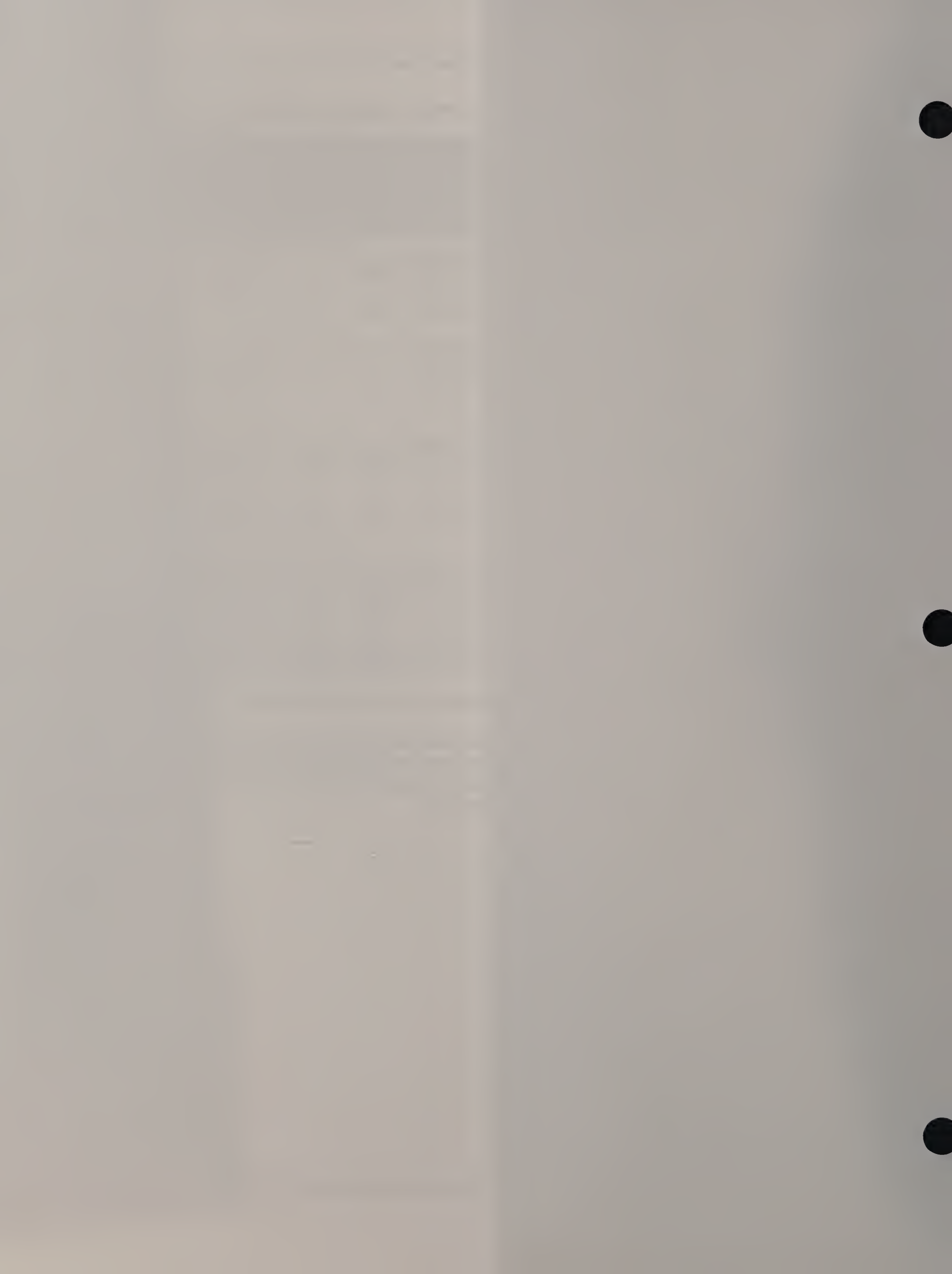
1. Queue shown is the longest reported average for the movement/approach. Queues derived from average of five SimTraffic simulations.
 (S) signalized intersection (U) unsignalized intersection
 * Indicates that lane was added as part of Build – Mitigated condition. [] indicates that lane/movement was removed as part of Build – Mitigated condition.
 ~ Volume exceeds capacity, queue is theoretically infinite. Queue shown is maximum after two cycles.
 # 95th percentile volume exceeds capacity. Queue may be longer. Queue shown is maximum after two cycles.
 m Volume for 95th percentile queue is metered by an upstream signal.

Table with multiple columns and rows, containing faint text and numbers. The content is illegible due to extreme blurriness.

Table 2-35: Capacity Analysis Summary, Friday p.m. "Real" Peak Hour, Bell Circle, Revere

Intersection	Existing (2013) Conditions						No Build (2023) Conditions						Build (2023) Conditions						Build (2023) with Mitigation Conditions							
	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)		
32. Beach Street/Everett Street/Route 1A/Route 16 (Bell Circle)																										
(S) Eastern Intersection																										
	E	69.2	0.57	--	--	--	E	66.1	0.69	--	--	--	E	65.5	0.69	--	--	--	E	64.8	0.69	--	--	--		
Beach WB right right	C	31.9	0.36	0	52	>800	D	41.1	0.78	104	#273	>800	D	41.5	0.78	107	#277	>800	D	41.5	0.78	107	#277	>800		
Rotary NB thru thru (continue in rotary)	B	14.4	0.12	0	m0	210	B	14.4	0.13	0	m0	210	B	14.4	0.13	0	m0	210	B	14.4	0.13	0	m0	210		
Rotary NB right right (onto Beach EB)	F	104.6	0.57	89	m38	160	F	93.4	0.68	121	m43	160	F	92.1	0.68	121	m43	160	F	90.8	0.68	122	m59	160		
(S) Western Intersection																										
	A	0.6	0.57	--	--	--	A	0.4	0.55	--	--	--	A	0.4	0.55	--	--	--	A	0.4	0.56	--	--	--		
Beach EB right	A	0.4	0.27	0	0	>800	A	0.5	0.30	0	0	>800	A	0.5	0.30	0	0	>800	A	0.5	0.30	0	0	>800		
Rotary SB thru thru (continue in rotary)	A	0.6	0.36	0	8	130	A	0.4	0.42	5	m6	130	A	0.4	0.42	5	m6	130	A	0.4	0.42	5	m6	130		
Rotary SB right (onto Beach WB)	A	0.6	0.44	7	0	120	A	0.4	0.42	0	m0	120	A	0.4	0.42	0	m0	120	A	0.4	0.42	0	m0	120		
(S) Northern Intersection																										
	B	18.5	0.85	--	--	--	C	22.7	0.97	--	--	--	C	22.8	0.98	--	--	--	C	22.8	0.98	--	--	--		
Rotary WB thru thru	C	26.6	0.80	350	452	140	D	35.9	0.96	476	m#632	140	D	36.3	0.96	478	m#633	140	D	36.2	0.96	479	m#633	140		
Rotary WB right	B	18.4	0.38	98	152	160	B	15.7	0.42	90	m113	160	B	15.7	0.42	90	m113	160	B	15.5	0.42	90	m112	160		
Route 60 NB thru thru	A	0.1	0.61	0	m0	220	A	0.1	0.65	0	m0	220	A	0.1	0.65	0	m0	220	A	0.1	0.65	0	m	220		
Route 60 SB thru thru	C	25.5	0.59	209	272	>800	C	27.7	0.69	256	328	>800	C	27.7	0.69	328	693	>800	C	27.7	0.69	256	328	>800		
Route 60 SB right (onto rotary)	C	26.4	0.55	141	244	>800	C	29.1	0.64	181	303	>800	C	29.1	0.64	181	303	>800	C	29.1	0.64	181	303	>800		
(S) Southern Intersection																										
	F	89.3	1.20	--	--	--	F	111.4	1.37	--	--	--	F	111.4	1.37	--	--	--	F	93.6	1.28	--	--	--		
Rotary EB thru thru	C	31.3	0.76	176	243	140	D	37.1	0.86	205	#325	140	D	37.1	0.86	205	#324	140	D	37.2	0.86	205	#324	140		
Rotary EB right right (onto 1A SB)	B	19.2	0.70	140	221	190	C	26.7	0.87	209	#398	190	C	26.9	0.88	212	#409	190	C	22.2	0.81	153	263	190		
Route 1A NB right right (towards rotary)	B	17.6	0.76	130	183	>800	B	19.0	0.56	176	240	>800	B	19.1	0.56	177	242	>800	C	20.7	0.52	182	243	>800		
Route 60 SB thru thru	A	31.1	0.63	50	56	220	A	5.3	0.73	67	75	220	A	5.3	0.73	67	75	220	A	1.4	0.68	18	9	220		
Route 60 NEB thru thru/right	F	206.7	1.38	~801	#937	>800	F	269.8	1.52	~969	#1065	>800	F	269.8	1.52	~929	#1065	>800	F	224.5	1.42	~897	#1033	>800		

1. Queue shown is the longest reported average for the movement/approach. Queues derived from average of five SimTraffic simulations.
 (S) signalized intersection (U) unsignalized intersection
 * Indicates that lane was added as part of Build – Mitigated condition. [] indicates that lane/movement was removed as part of Build – Mitigated condition.
 ~ Volume exceeds capacity, queue is theoretically infinite. Queue shown is maximum after two cycles.
 # 95th percentile volume exceeds capacity. Queue may be longer. Queue shown is maximum after two cycles.
 m Volume for 95th percentile queue is metered by an upstream signal.



2.2.6 WELLINGTON CIRCLE AND SELECT INTERSECTIONS, MEDFORD

Wellington Circle is the intersection of Mystic Valley Parkway (Route 16) and Fellsway (Route 28), and consists of three distinct, closely coordinated signalized intersections.

Volume diagrams for Wellington Circle under the Existing 2013 Friday p.m. and Saturday afternoon peak hours are shown in Figure 2-47 and Figure 2-48. The 2023 No Build Friday p.m. and Saturday afternoon peak hour volumes at Wellington Circle are shown in Figure 2-49 and Figure 2-50. The Project-generated trips for the Friday p.m. peak hour are shown in Figure 2-51, and for the Saturday afternoon peak hour in Figure 2-52. The Friday p.m. “real” peak hour project-generated trips are shown in Figure 2-53. The Build (2023) Friday p.m. and Saturday afternoon peak hour volumes, which add the updated Project-generated trips to the No Build volumes, are shown in Figure 2-54 and Figure 2-55. The Build (2023) Friday p.m. “real” peak hour volumes are shown in Figure 2-56.

Volume diagrams for two locations on Mystic Valley Parkway (Route 16) in Medford during the Existing 2013 Friday p.m. and Saturday afternoon peak hours are shown in Figure 2-57 and Figure 2-58. The 2023 No Build Friday p.m. and Saturday afternoon peak hour volumes at are shown in Figure 2-59 and Figure 2-60. The Project-generated trips for the Friday p.m. peak hour are shown in Figure 2-61, and for the Saturday afternoon peak hour in Figure 2-62. The Friday p.m. “real” peak hour Project-generated trips are shown in Figure 2-63. The Build (2023) Friday p.m. and Saturday afternoon peak hour volumes, which add the updated Project-generated trips to the No Build volumes, are shown in Figure 2-64 and Figure 2-65. The Build (2023) Friday p.m. “real” peak hour volumes are shown in Figure 2-66.

2.2.6.1 MITIGATION

To address both current and projected future operational deficiencies at Wellington Circle, the Proponent has collaborated with MassDOT on a plan to optimize traffic signal timing and phasing and make certain geometric improvements within the existing public right-of-way. The geometric improvements include providing an additional through travel lane on both Route 16 approaches and an additional left-turn lane on the Fellsway (Route 28) northbound approach. Figure 2-67A shows the geometric improvements at 150-scale. The geometric improvements are depicted Figure 2-67B and Figure 2-67C at eighty-scale (80-scale). The improvements also include removing some paved areas to create new green space and planting new trees to improve the streetscape.

The Proponent has also committed to contribute up to \$1.5 million to the funding of a study of long-term alternatives at Wellington Circle.

DCR requested details of the proposed timing adjustments. Table 2-36 shows the timing changes for the Friday p.m. peak hour at the three intersections of Wellington Circle. Table 2-37 shows the proposed signal timing changes for the Saturday afternoon peak hour.

Table 2-36: Signal Timing Adjustment Summary, Friday, Wellington Circle, Medford

Lane Group	Existing Conditions					Build Mitigated Conditions				
	Phase	Min Green	Max Green	Yellow	All Red	Phase	Min Green	Max Green	Yellow	All Red
West Intersection										
EB Left/Thru/Right	2	4	27	3	2	2	4	27	3	2
WB Left	1	4	26	3	2	1	4	27	3	2
WB Thru	6	16	58	3	2	6	16	59	3	2
SB Left/Thru/Right	7	4	13	3	2	7	4	17	3	2
SB Hard Right	4	4	14	3	2	4	4	9	3	2
East Intersection										
EB Left	5	4	14	3	2	5	4	12	3	2
EB Thru	2	16	34	3	2	2	16	44	3	2
WB Thru/Right	6	16	40	3	2	6 & 7	4	39	3	2
NB Left/Thru/Right	8	16	31	3	2	8	16	34	3	2
NB Hard Right	1 & 8	40	56	3	2	7 & 8	16	46	3	2
North Intersection										
SWB Left/Right	8	16	21	3	2	8	16	21	3	2
NB Thru	2	16	69	3	2	2	16	69	3	2

Table 2-37: Signal Timing Adjustment Summary, Saturday, Wellington Circle, Medford

Lane Group	Existing Conditions					Build Mitigated Conditions				
	Phase	Min Green	Max Green	Yellow	All Red	Phase	Min Green	Max Green	Yellow	All Red
West Intersection										
EB Left/Thru/Right	2	4	27	3	2	2	4	19	3	2
WB Left	1	4	26	3	2	1	4	33	3	2
WB Thru	6	16	58	3	2	6	6	57	3	2
SB Left/Thru/Right	7	4	13	3	2	7	7	18	3	2
SB Hard Right	4	4	14	3	2	4	4	10	3	2
East Intersection										
EB Left	5	4	14	3	2	5	4	12	3	2
EB Thru	2	16	34	3	2	2	16	44	3	2
WB Thru/Right	6	16	40	3	2	6 & 7	4	39	3	2
NB Left/Thru/Right	8	16	31	3	2	8	16	34	3	2
NB Hard Right	1 & 8	40	56	3	2	7 & 8	16	46	3	2
North Intersection										
SWB Left/Right	8	16	21	3	2	8	16	21	3	2
NB Thru	2	16	69	3	2	2	16	69	3	2

2.2.6.2 TRAFFIC ANALYSIS

The analyses described in Section 2.1.3, already reviewed by MassDOT show that the proposed improvements described in Section 2.2.6.1 will effectively mitigate the impacts of Project traffic on Wellington Circle and the Mystic Valley Parkway (Route 16) approaches to the Circle as described in further detail below.

In the No Build Condition, during the Friday p.m. peak hour, the western, eastern, and northern intersections of Wellington Circle will operate at LOS F, LOS E, and LOS B, respectively. In the Build with Mitigation Condition these intersections will operate at LOS D, LOS D, and LOS B, respectively, effectively mitigating the traffic generated by the Project.

In the No Build Condition, during the Saturday afternoon peak hour, the western, eastern, and northern intersections of Wellington Circle will operate at LOS E, LOS C, and LOS C, respectively. In the Build with Mitigation Condition, these three intersections will continue to operate at those levels of service, effectively mitigating the traffic generated by the Project.

In the No Build Condition, during the Friday p.m. "real" peak hour, the western, eastern, and northern intersections of Wellington Circle will operate at LOS F, LOS E, and LOS B, respectively. In the Build with Mitigation Condition, these three intersections will operate at LOS D, an LOS D, and LOS B, respectively, effectively mitigating the traffic generated by the Project.

CASTs for the Friday p.m., Saturday afternoon, and Friday p.m. "real" peak hours are provided in Table 2-38, Table 2-39, and Table 2-40.

Table 2-38: Capacity Analysis Summary, Friday p.m. Peak Hour, Wellington Circle and Selected Intersections, Medford

Intersection	Existing (2013) Conditions						No Build (2023) Conditions						Build (2023) Conditions						Build (2023) with Mitigation Conditions					
	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)
38. (S) Harvard Street/Mystic Valley Parkway (Route 16)/ Mystic Avenue (Route 38)	E	63.7	0.90	–	–	–	E	72.6	0.96	–	–	–	E	74.2	0.97	–	–	–	E	70.6	0.97	–	–	–
Harvard EB left/thru thru/right	D	43.3	0.70	220	308	>800	D	44.6	0.75	225	315	>800	D	44.6	0.75	227	318	>800	F	102.7	1.07	467	642	>800
Route 16 WB left	D	47.9	0.85	194	232	150	D	54.3	0.90	195	222	150	D	54.2	0.90	195	229	150	E	67.1	0.98	194	226	150
Route 16 WB thru	D	54.8	0.91	274	286	250	E	65.3	0.97	274	288	250	E	65.2	0.97	273	286	250	F	85.9	1.06	274	291	250
Route 16 WB right	D	48.3	0.31	78	147	250	D	42.8	0.38	79	151	250	D	42.7	0.39	83	156	250	C	21.3	0.43	104	226	250
Route 38 NB left	E	67.3	0.68	90	152	75	E	70.5	0.72	93	152	75	E	70.5	0.72	98	152	75	E	59.6	0.62	90	156	75
Route 38 NB thru thru/right	E	77.3	0.98	225	382	>800	F	95.5	1.05	265	398	>800	F	95.5	1.05	265	418	>800	F	82.9	1.00	234	401	>800
Route 38 SB left	F	213.9	1.26	154	182	110	F	262.8	1.38	159	162	110	F	285.3	1.43	159	162	110	D	52.5	0.68	123	176	110
Route 38 SB thru thru/right	D	42.2	0.34	459	856	>800	D	42.8	0.38	618	1053	>800	D	42.8	0.38	693	1114	>800	C	33.3	0.27	118	208	>800
39. (S) Mystic Valley Parkway (Route 16)/Route 16 Connector	D	42.5	0.73	–	–	–	E	72.1	0.84	–	–	–	F	90.8	0.88	–	–	–	E	61.1	0.88	–	–	–
Route 16 EB thru thru	B	12.7	0.44	120	166	300	B	13.9	0.48	130	176	300	B	14.3	0.48	129	180	300	C	31.1	0.59	266	335	300
Route 16 WB thru thru	B	13.9	0.42	720	987	>800	B	14.5	0.47	813	1060	>800	B	14.6	0.48	790	956	>800	C	22.6	0.57	390	513	>800
Route 16 Connector SB left left	F	91.4	1.08	387	433	>800	F	169.2	1.27	398	437	>800	F	212.6	1.37	399	428	>800	F	118.3	1.16	145	271	>800
Route 16 Connector SB right	D	35.1	0.57	235	342	>800	D	38.6	0.68	214	324	>800	D	38.8	0.68	196	282	>800	C	32.1	0.63	394	433	>800
42. Mystic Valley Parkway (Route 16)/Fellsway (Route 28) (Wellington Circle)																								
(S) Western Intersection	D	54.8	0.94	–	–	–	F	88.6	1.11	–	–	–	F	97.5	1.13	–	–	–	D	52.6	1.04	–	–	–
Route 16 EB thru* thru* thru thru thru thru thru/right	D	48.3	0.96	834	1134	>800	F	102.8	1.13	1112	1287	>800	F	127.9	1.19	1725	1745	>800	E	73.2	1.06	753	891	>800
Route 16 WB left left left	E	67.8	0.89	172	181	160	F	102.8	1.08	172	184	160	F	102.4	1.08	173	180	160	D	47.9	1.03	144	189	160
Route 16 WB thru thru thru*	B	13.7	0.72	92	156	160	C	22.8	0.91	100	166	160	C	24.5	0.93	104	162	160	A	5.9	0.64	59	108	160
Route 28 SB left left left*	F	197.6	1.31	640	654	160	F	285.1	1.51	641	355	160	F	292.3	1.53	642	654	160	D	48.2	0.80	632	725	160
Route 28 SB [thru] thru thru/right	D	53.6	0.82	621	759	>800	E	64.3	0.92	624	742	>800	E	64.3	0.92	627	745	>800	F	86.6	1.03	357	758	>800
Middlesex SWB left* left left left/right [Middlesex SWB right]	B	13.7	0.68	88	158	160	B	16.1	0.76	85	155	160	B	16.1	0.76	113	178	160	F	99.2	1.08	161	186	160
	B	13.7	0.43	1	22	160	B	14.5	0.45	3	28	160	B	14.5	0.45	2	25	160	–	–	–	–	–	–
(S) Eastern Intersection	D	40.1	1.05	–	–	–	E	74.4	1.20	–	–	–	F	82.2	1.23	–	–	–	D	40.3	1.17	–	–	–
Route 16 EB left left	D	46.5	0.69	79	134	180	D	47.1	0.75	69	123	180	D	47.4	0.75	65	113	180	E	64.5	0.87	82	143	180
Route 16 EB thru thru thru thru	C	25.6	1.01	69	111	180	F	103.4	1.19	67	112	180	F	129.8	1.25	70	108	180	B	9.5	0.96	51	102	180
Route 16 WB thru thru thru thru thru	C	26.7	0.71	738	850	>800	C	33.4	0.91	1222	1309	>800	C	34.4	0.92	1125	1206	>800	D	37.5	0.94	244	343	>800
Route 16 WB right	D	35.4	0.78	283	511	700	E	79.3	1.05	368	655	700	F	83.2	1.06	372	659	700	F	93.4	1.09	262	282	700
Route 28 NB left* left	D	43.1	0.78	448	567	>800	E	61.4	0.94	513	577	>800	E	61.4	0.94	500	646	>800	C	26.9	0.45	307	460	>800
Route 28 NB [left]/thru thru	E	59.3	0.99	534	756	>800	F	97.9	1.11	542	768	>800	F	97.9	1.11	545	749	>800	D	44.9	0.92	394	363	>800
Route 28 NB bear right	F	145.1	1.21	49	300	>800	F	203.0	1.35	108	444	>800	F	203.0	1.35	29	201	>800	F	80.1	1.04	554	570	>800
Route 28 NB right right	C	20.6	0.76	15	135	450	C	25.4	0.86	35	205	450	C	25.4	0.86	21	167	450	E	55.0	1.01	560	580	450
(S) North Intersection	B	15.7	0.44	–	–	–	B	16.8	0.50	–	–	–	B	16.8	0.50	–	–	–	B	14.3	0.50	–	–	–
Route 28 NB thru thru thru	A	6.0	0.43	96	129	125	A	7.9	0.48	86	136	125	A	8.0	0.48	87	138	125	A	4.4	0.48	124	177	125
Middlesex SWB thru thru thru thru/right	D	36.3	0.50	169	249	80	D	36.8	0.54	149	231	80	D	36.9	0.55	200	300	80	D	36.9	0.55	305	403	80

1. Queue shown is the longest reported average for the movement/approach. Queues derived from average of five SimTraffic simulations.
 (S) signalized intersection (U) unsignalized intersection
 * Indicates that lane was added as part of Build – Mitigated condition. [] indicates that lane/movement was removed as part of Build – Mitigated condition.

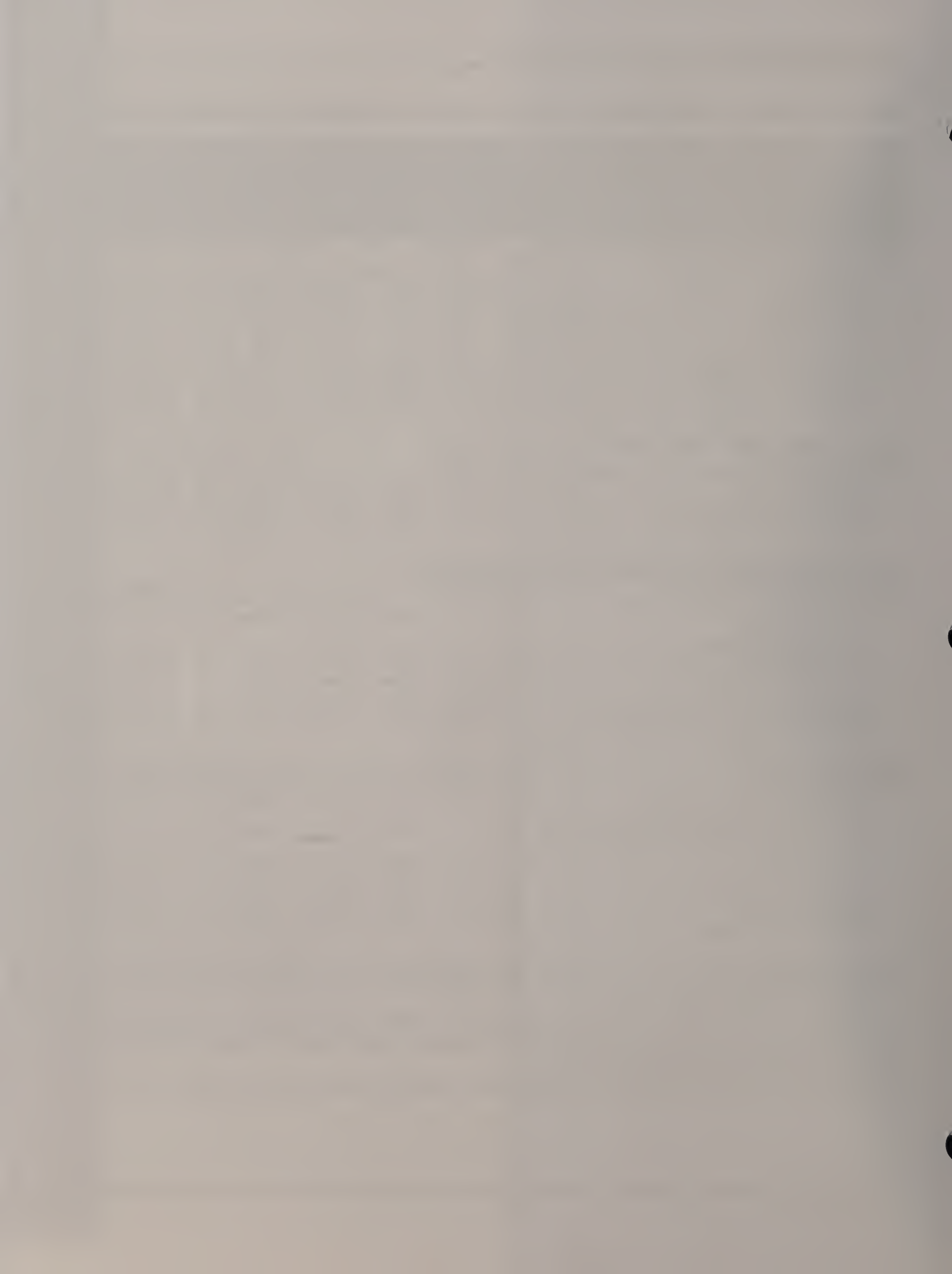


Table 2-39: Capacity Analysis Summary, Saturday Afternoon Peak Hour, Wellington Circle and Selected Intersections, Medford

Intersection	Existing (2013) Conditions						No Build (2023) Conditions						Build (2023) Conditions						Build (2023) with Mitigation Conditions					
	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)
38. (S) Harvard Street/Mystic Valley Parkway (Route 16)/ Mystic Avenue (Route 38)	E	56.3	0.72	--	--	--	E	55.4	0.76	--	--	--	E	57.2	0.76	--	--	--	E	55.2	0.76	--	--	--
Harvard EB left/thru thru/right	D	40.5	0.59	169	247	>800	D	41.2	0.62	169	241	>800	D	41.2	0.62	175	250	>800	E	61.7	0.89	334	214	>800
Route 16 WB left	D	42.7	0.81	194	231	150	D	49.1	0.87	188	247	150	D	49.0	0.87	194	228	150	E	59.1	0.95	194	223	150
Route 16 WB thru	D	53.9	0.91	274	285	250	E	69.2	0.98	273	288	250	E	69.1	0.98	274	285	250	F	91.7	1.08	274	290	250
Route 16 WB right	D	42.7	0.27	70	146	250	D	38.9	0.34	66	138	250	D	39.3	0.35	74	155	250	C	21.7	0.38	83	204	250
Route 38 NB left	E	62.9	0.59	54	107	75	E	66.4	0.63	55	108	75	E	66.4	0.63	66	123	75	E	59.8	0.56	49	109	75
Route 38 NB thru thru/right	D	43.3	0.38	92	156	>800	D	44.3	0.44	100	170	>800	D	44.3	0.44	101	167	>800	D	44.2	0.44	87	167	>800
Route 38 SB left	F	219.2	1.27	120	171	110	F	169.3	1.13	136	188	110	F	193.4	1.20	151	183	110	D	46.4	0.55	105	165	110
Route 38 SB thru thru/right	D	40.9	0.36	164	373	>800	D	40.5	0.32	239	554	>800	D	40.5	0.32	341	651	>800	C	31.1	0.23	64	186	>800
39. (S) Mystic Valley Parkway (Route 16)/Route 16 Connector	C	30.5	0.72	--	--	--	D	38.1	0.74	--	--	--	E	55.4	0.79	--	--	--	D	36.3	0.79	--	--	--
Route 16 EB thru thru	B	13.2	0.37	95	139	300	B	12.0	0.36	96	141	300	B	12.4	0.37	102	140	300	C	25.1	0.44	177	272	300
Route 16 WB thru thru	B	14.6	0.48	403	513	>800	B	14.5	0.47	906	1249	>800	B	14.5	0.47	766	1031	>800	C	22.6	0.57	400	513	>800
Route 16 Connector SB left left	E	57.3	0.96	265	334	>800	E	78.0	1.04	377	447	>800	F	121.2	1.16	398	430	>800	E	56.2	0.98	115	215	>800
Route 16 Connector SB right	D	35.9	0.60	216	320	>800	D	35.8	0.60	237	338	>800	D	35.9	0.60	205	291	>800	C	30.2	0.56	397	416	>800
42. Mystic Valley Parkway (Route 16)/Fellsway (Route 28) (Wellington Circle)																								
(S) Western Intersection	D	52.9	0.88	--	--	--	E	77.6	1.01	--	--	--	F	82.0	1.05	--	--	--	E	61.0	1.07	--	--	--
Route 16 EB thru* thru* thru thru thru thru thru/right	C	34.8	0.69	756	1079	>800	D	38.4	0.82	1501	1836	>800	D	42.0	0.89	829	1144	>800	F	107.7	1.13	809	824	>800
Route 16 WB left left left	F	103.9	1.06	171	180	160	F	170.0	1.23	171	181	160	F	183.9	1.26	172	180	160	C	33.0	0.99	155	169	160
Route 16 WB thru thru thru*	A	9.8	0.63	48	94	160	B	14.1	0.74	52	98	160	B	15.1	0.76	53	107	160	A	2.4	0.54	36	80	160
Route 28 SB left left left*	F	97.8	1.04	638	644	160	F	152.9	1.20	639	648	160	F	161.1	1.22	639	650	160	D	40.8	0.61	631	667	160
Route 28 SB [thru] thru thru/right	E	72.8	0.97	634	723	>800	F	97.7	1.06	629	713	>800	F	97.7	1.06	630	749	>800	F	116.8	1.12	629	651	>800
Middlesex SWB left* left left left/right [Middlesex SWB right]	B	14.8	0.75	107	170	160	B	16.6	0.81	131	195	160	B	16.6	0.81	126	189	160	F	96.0	1.07	161	178	160
	B	16.7	0.54	1	14	160	B	17.2	0.58	7	49	160	B	17.2	0.58	5	40	160	--	--	--	--	--	--
(S) Eastern Intersection	C	27.2	0.84	--	--	--	C	29.0	0.89	--	--	--	C	29.3	0.90	--	--	--	C	27.2	0.95	--	--	--
Route 16 EB left left	D	48.0	0.60	84	140	180	D	47.5	0.66	71	123	180	D	47.2	0.66	41	123	180	E	55.3	0.77	56	102	180
Route 16 EB thru thru thru thru	B	17.5	0.68	64	125	180	B	18.2	0.82	68	137	180	B	18.7	0.89	64	128	180	A	5.0	0.69	38	83	180
Route 16 WB thru thru thru thru thru	C	27.7	0.76	1206	1389	>800	C	30.5	0.85	1132	1231	>800	C	31.3	0.87	1196	1368	>800	C	33.0	0.89	549	669	>800
Route 16 WB right	C	33.8	0.75	134	270	700	D	40.8	0.85	152	286	700	D	42.0	0.87	135	280	700	D	45.5	0.89	423	652	700
Route 28 NB left* left	C	31.7	0.50	504	580	>800	C	32.8	0.54	488	648	>800	C	33.6	0.57	468	582	>800	C	25.5	0.34	76	153	>800
Route 28 NB [left]/thru thru	C	29.7	0.49	537	731	>800	C	30.4	0.53	534	538	>800	C	30.9	0.56	538	753	>800	C	26.0	0.39	115	339	>800
Route 28 NB bear right	D	51.4	0.87	117	482	>800	E	55.4	0.90	418	764	>800	E	55.4	0.90	4	78	>800	C	34.8	0.70	555	568	>800
Route 28 NB right right	B	18.8	0.71	17	163	450	B	19.5	0.73	1	14	450	B	19.5	0.73	3	55	450	C	32.2	0.87	560	578	450
(S) North Intersection	C	21.9	0.33	--	--	--	C	22.0	0.37	--	--	--	C	21.9	0.37	--	--	--	C	22.1	0.37	--	--	--
Route 28 NB thru thru thru	A	6.3	0.24	49	92	125	A	7.2	0.29	47	94	125	A	7.2	0.29	47	94	125	A	7.6	0.29	135	186	125
Middlesex SWB thru thru thru thru/right	D	37.8	0.60	209	298	80	D	38.5	0.64	226	306	80	D	38.5	0.46	214	273	80	D	38.5	0.64	287	349	80

1. Queue shown is the longest reported average for the movement/approach. Queues derived from average of five SimTraffic simulations.
 (S) signalized intersection (U) unsignalized intersection
 * Indicates that lane was added as part of Build – Mitigated condition. [] indicates that lane/movement was removed as part of Build – Mitigated condition.

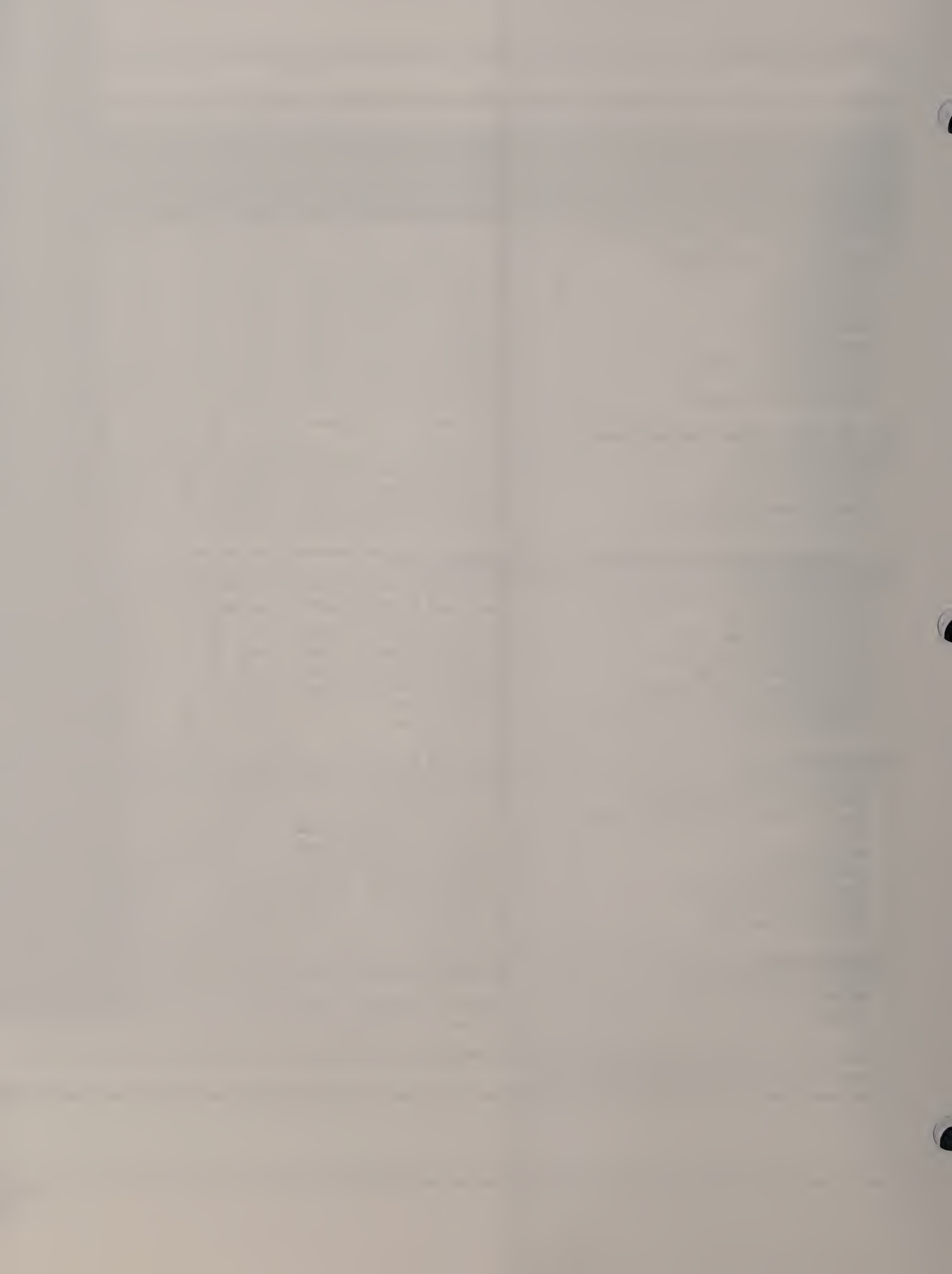
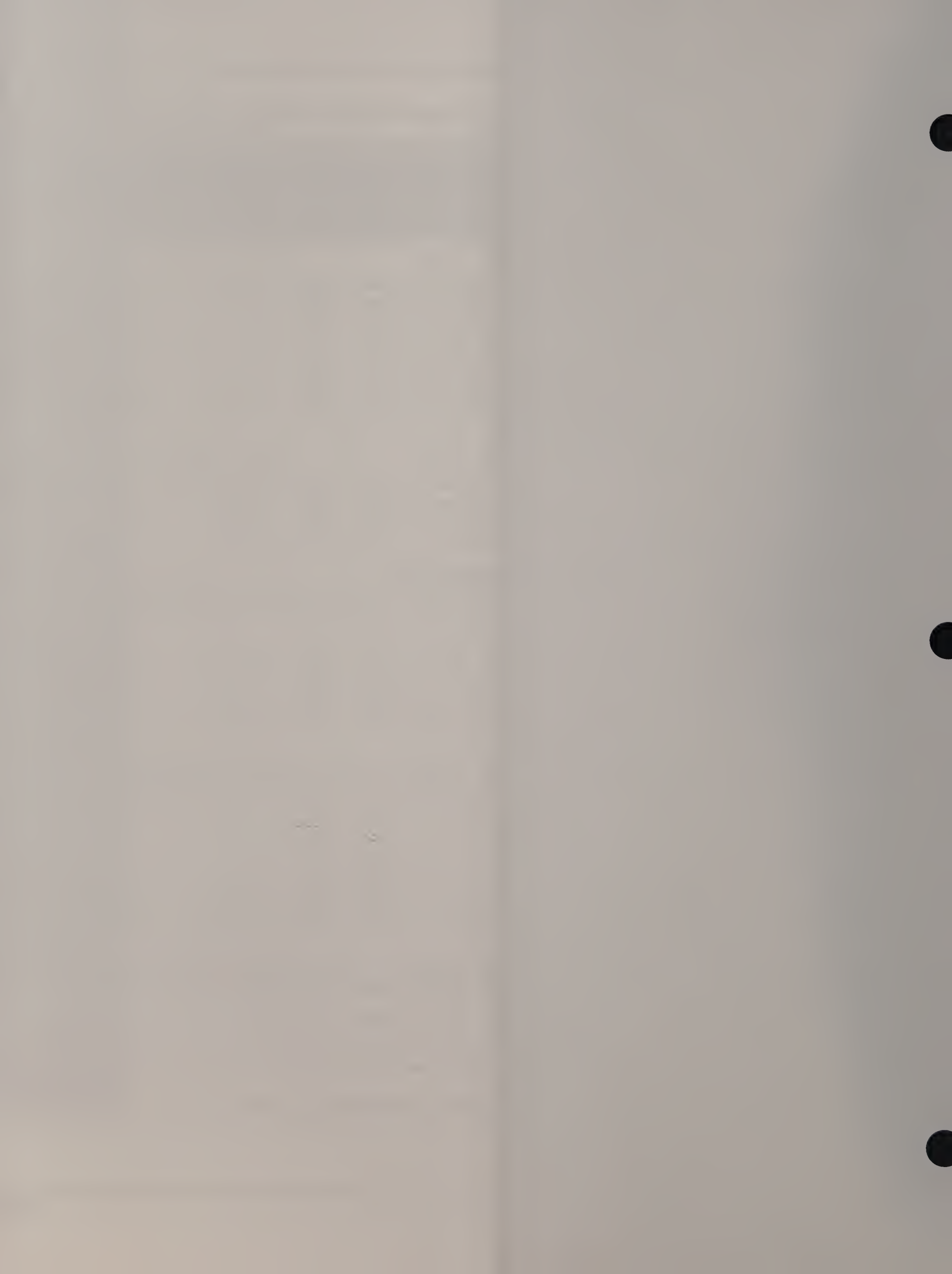


Table 2-40: Capacity Analysis Summary, Friday p.m. "Real" Peak Hour, Wellington Circle and Selected Intersections, Medford

Intersection	Existing (2013) Conditions						No Build (2023) Conditions						Build (2023) Conditions						Build (2023) with Mitigation Conditions					
	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)
38. (S) Harvard Street/Mystic Valley Parkway (Route 16)/ Mystic Avenue (Route 38)	E	63.7	0.90	–	–	–	E	72.6	0.96	–	–	–	E	73.4	0.96	–	–	–	E	70.6	0.96	–	–	–
Harvard EB left/thru thru/right	D	43.3	0.70	220	308	>800	D	44.6	0.75	225	315	>800	D	44.6	0.75	228	326	>800	F	102.7	1.07	441	632	>800
Route 16 WB left	D	47.9	0.85	194	232	150	D	54.3	0.90	195	222	150	D	54.2	0.90	194	231	150	E	66.9	0.98	195	222	150
Route 16 WB thru	D	54.8	0.91	274	286	250	E	65.3	0.97	274	288	250	E	65.3	0.97	274	290	250	F	85.8	1.06	272	289	250
Route 16 WB right	D	48.3	0.31	78	147	250	D	42.8	0.38	79	151	250	D	42.7	0.39	94	186	250	C	20.9	0.42	98	226	250
Route 38 NB left	E	67.3	0.68	90	152	75	E	70.5	0.72	93	152	75	E	70.5	0.72	98	154	75	E	59.6	0.62	89	154	75
Route 38 NB thru thru/right	E	77.3	0.98	225	382	>800	F	95.5	1.05	265	398	>800	F	95.5	1.05	245	389	>800	F	82.9	1.00	192	309	>800
Route 38 SB left	F	213.9	1.26	154	182	110	F	262.8	1.38	159	162	110	F	274.0	1.41	159	164	110	D	51.7	0.67	121	178	110
Route 38 SB thru thru/right	D	42.2	0.34	459	856	>800	D	42.8	0.38	618	1053	>800	D	42.8	0.38	560	922	>800	C	33.3	0.27	129	261	>800
39. (S) Mystic Valley Parkway (Route 16)/Route 16 Connector	D	45.5	0.73	–	–	–	E	72.1	0.84	–	–	–	F	82.5	0.86	–	–	–	E	55.5	0.86	–	–	–
Route 16 EB thru thru	B	12.7	0.44	120	166	300	B	13.9	0.48	130	176	300	B	14.1	0.48	124	174	300	C	31.2	0.58	256	342	300
Route 16 WB thru thru	B	13.9	0.42	720	987	>800	B	14.5	0.47	813	1060	>800	B	14.6	0.47	762	981	>800	C	22.6	0.57	371	491	>800
Route 16 Connector SB left left	F	91.4	1.08	387	433	>800	F	169.2	1.27	398	437	>800	F	193.7	1.33	384	445	>800	F	103.5	1.12	138	262	>800
Route 16 Connector SB right	D	35.1	0.57	235	342	>800	D	38.6	0.68	214	324	>800	D	38.8	0.68	213	315	>800	C	32.0	0.63	398	414	>800
42. Mystic Valley Parkway (Route 16)/Fellsway (Route 28) (Wellington Circle)																								
(S) Western Intersection	D	54.8	0.94	–	–	–	F	88.6	1.11	–	–	–	F	93.6	1.12	–	–	–	D	50.0	1.04	–	–	–
Route 16 EB thru* thru* thru thru thru thru thru/right	D	48.3	0.96	834	1134	>800	F	102.8	1.13	1112	1287	>800	F	117.0	1.17	833	1162	>800	E	65.5	1.04	675	860	>800
Route 16 WB left left left	E	67.8	0.89	172	181	160	F	102.8	1.08	172	184	160	F	102.6	1.08	172	182	160	D	48.2	1.03	144	186	160
Route 16 WB thru thru thru*	B	13.7	0.72	92	156	160	C	22.8	0.91	100	166	160	C	23.8	0.92	107	155	160	A	5.7	0.63	57	107	160
Route 28 SB left left left*	F	197.6	1.31	640	654	160	F	285.1	1.51	641	355	160	F	289.2	1.52	643	660	160	D	48.0	0.80	633	647	160
Route 28 SB [thru] thru thru/right	D	53.6	0.82	621	759	>800	E	64.3	0.92	624	742	>800	E	64.3	0.92	427	718	>800	F	86.6	1.03	608	746	>800
Middlesex SWB left* left left/right	B	13.7	0.68	88	158	160	B	16.1	0.76	85	155	160	B	16.1	0.76	121	191	160	F	96.4	1.08	161	186	160
[Middlesex SWB right]	B	13.7	0.43	1	22	160	B	14.5	0.45	3	28	160	B	14.5	0.45	2	29	160	–	–	–	–	–	–
(S) Eastern Intersection	D	40.1	1.05	–	–	–	E	74.4	1.20	–	–	–	E	78.7	1.22	–	–	–	D	40.0	1.16	–	–	–
Route 16 EB left left	D	46.5	0.69	79	134	180	D	47.1	0.75	69	123	180	D	47.2	0.75	65	113	180	E	64.2	0.87	106	160	180
Route 16 EB thru thru thru thru	C	25.6	1.01	69	111	180	F	103.4	1.19	67	112	180	F	118.4	1.22	69	103	180	A	9.0	0.95	58	107	180
Route 16 WB thru thru thru thru thru	C	26.7	0.71	738	850	>800	C	33.4	0.91	1222	1309	>800	C	33.9	0.91	272	317	>800	D	36.6	0.94	233	322	>800
Route 16 WB right	D	35.4	0.78	283	511	700	E	79.3	1.05	368	655	700	F	81.7	1.06	180	307	700	F	91.7	1.09	264	285	700
Route 28 NB left* left	D	43.1	0.78	448	567	>800	E	61.4	0.94	513	577	>800	E	61.4	0.94	469	690	>800	C	26.9	0.45	146	271	>800
Route 28 NB [left]/thru thru	E	59.3	0.99	534	756	>800	F	97.9	1.11	542	768	>800	F	97.9	1.11	544	767	>800	D	44.9	0.92	341	593	>800
Route 28 NB bear right	F	145.1	1.21	49	300	>800	F	203.0	1.35	108	444	>800	F	203.0	1.35	93	416	>800	F	80.1	1.04	551	588	>800
Route 28 NB right right	C	20.6	0.76	15	135	450	C	25.4	0.86	35	205	450	C	25.4	0.86	31	191	450	E	55.0	1.01	560	578	450
(S) North Intersection	B	15.7	0.44	–	–	–	B	16.8	0.50	–	–	–	B	16.8	0.50	–	–	–	B	15.1	0.50	–	–	–
Route 28 NB thru thru thru	A	6.0	0.43	96	129	125	A	7.9	0.48	86	136	125	A	8.0	0.48	107	157	125	A	5.6	0.48	139	183	125
Middlesex SWB thru thru thru thru/right	D	36.3	0.50	169	249	80	D	36.8	0.54	149	231	80	D	36.9	0.55	183	226	80	D	36.9	0.55	308	407	80

1. Queue shown is the longest reported average for the movement/approach. Queues derived from average of five SimTraffic simulations.
 (S) signalized intersection (U) unsignalized intersection
 * Indicates that lane was added as part of Build – Mitigated condition. [] indicates that lane/movement was removed as part of Build – Mitigated condition.



2.2.7 SULLIVAN SQUARE AND RUTHERFORD AVENUE, BOSTON

The poor operation of Sullivan Square under existing conditions has been a matter of significant concern for MassDOT, the City of Boston, and neighboring communities for many years. At the intersection of Maffa Way, Cambridge Street, and Alford Street, during certain time periods, the Cambridge Street eastbound approach to Sullivan Square experiences significant queues that spill back and block the I-93 Northbound off-ramp.

The Proponent has collaborated with MassDOT, the MBTA, and the BTD on immediate improvements to Sullivan Square that would effectively mitigate the Project's traffic impacts in a way that is compatible with the City of Boston's longer term plans to improve this intersection. Pursuant 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 the course of its extensive post-FEIR collaboration with MassDOT, the MBTA and the BTD, the Proponent has explored every interim improvement suggested by MassDOT, the MBTA, and the City of Boston, and has worked tirelessly to reconcile differences between those stakeholders' suggestions.

The result of this collaboration is a plan that the analyses described in Section 2.1.3 confirm will effectively mitigate the Project's traffic impacts in the Sullivan Square area.

As described in Section 2.2.1, at the request of BTD and MassDOT, turning movements at the intersections at each of the Study Area intersections at Sullivan Square and along Rutherford Avenue, including Cambridge Street at the I-93 off-ramp, were recounted on Friday, December 5, and Saturday, December 6, 2014. Volumes in the underpasses under Austin Street and Sullivan Square were verified with Automatic Traffic Recorders (ATRs). Origin-destination data in Sullivan Square was re-collected at the same time. The more recently collected data was seasonally adjusted and used in lieu of data collected in May and June 2013, which was used in the analyses contained in the FEIR. In addition, as discussed in Section 2.2, the intersection of Cambridge Street at Spice Street and Beacham Street (MBTA Driveway) was included in the more recent data collection effort and added to the Study Area as intersection #58.

Volume diagrams for Sullivan Square in the Existing (2014) Friday p.m. and Saturday afternoon peak hours are shown in Figure 2-68 and Figure 2-69. The No Build (2023) Friday p.m. and Saturday afternoon peak hour volumes at Sullivan Square are shown in Figure 2-70 and Figure 2-71. The Project-generated trips for the Friday p.m. peak hour are shown in Figure 2-72, and for the Saturday afternoon peak hour are in Figure 2-73. The Friday p.m. "real" peak hour project-generated

trips are shown in Figure 2-74. The Build (2023) Friday p.m. and Saturday afternoon peak hour volumes, which add the updated Project-generated trips to the No Build volumes, are shown in Figure 2-75 and Figure 2-76. The Build (2023) Friday p.m. “real” peak hour volumes are shown in Figure 2-77. Traffic volumes in the Build (2023) Condition with Mitigation for the Friday p.m. peak hour, Saturday afternoon peak hour, and Friday “real” peak hour are shown in Figure 2-78, Figure 2-79 and Figure 2-80.

Volume diagrams for the intersections on Rutherford Avenue under the Existing (2014) Friday p.m. and Saturday afternoon peak hours are shown in Figure 2-81 and Figure 2-82. The No Build (2023) Friday p.m. and Saturday afternoon peak hour volumes are shown in Figure 2-83 and Figure 2-84. The Project-generated trips for the Friday p.m. peak hour are shown in Figure 2-85, and for the Saturday afternoon peak hour are in Figure 2-86. The Friday p.m. “real” peak hour Project-generated trips are shown in Figure 2-87. The Build (2023) Friday p.m. and Saturday afternoon peak hour volumes, which add the updated Project-generated trips to the No Build volumes, are shown in Figure 2-88 and Figure 2-89. The Build (2023) Friday p.m. “real” peak hour volumes are shown in Figure 2-90.

2.2.7.1 MITIGATION

To address both current and projected future operational deficiencies at the Sullivan Square/Rutherford Avenue area, the Proponent has collaborated with MassDOT, the MBTA, and the BTD on a plan to improve the Sullivan Square/Rutherford Avenue area, effectively mitigating the Project’s traffic in this area. Those improvements include reconstructing Cambridge Street between its intersection with the I-93 northbound off-ramp and its intersection with Sullivan Square and Maffa Way, upgrading the traffic signal equipment at the intersections of the I-93 northbound off-ramp (Ramp C-L) and Maffa Way, and installing new traffic signals at the intersection of Spice Street, the Beacham Street Extension and Cambridge Street, and also at the intersection of Maffa Way and the Beacham Street Extension. The signals will be coordinated and timed to improve traffic flow and include accessible countdown pedestrian walk signals.

In response to a request by the City of Boston, the improvements also include improvements to Spice Street and D Street to re-route traffic from Cambridge Street and from Maffa Way that is ultimately destined for Rutherford Avenue southbound to relieve congestion at the Maffa Way/Cambridge Street/Alford Street/rotary. This is subject to the agreement of Massport, which is believed to own part of D Street.

As a result of the extensive consultation with the MBTA and BTD, the Proponent will implement additional improvements to the MBTA Busway between Cambridge Street and Maffa Way, a reconfiguration of the parking field in front of the MBTA Sullivan Square bus station, and additional improvements in how the MBTA's buses enter and exit the bus station. The plan includes a new signalized busway exit opposite the I-93 northbound off-ramp on Cambridge Street for right-turning buses. In order to accommodate the need for MBTA bus layover, which currently occurs on the MBTA Busway that will become Beacham Street Extension, the Proponent will reconstruct the lower busway and the parking field, creating a new circulation pattern for the bus station. All buses will enter the upper busway from Maffa Way. A new signalized entrance will be constructed, allowing buses to circulate into the station from Beacham Street Extension and Main Street. Buses will circulate from the upper busway to the lower busway, exiting the station onto Maffa Way via the new signalized busway exit, with the exception of those buses with destinations via Cambridge Street westbound toward Somerville.

As a result of these improvements, vehicles that currently turn right onto Cambridge Street from Maffa Way will now utilize the proposed Beacham Street Extension as will vehicles originating from Cambridge Street and destined for Main Street west of Sullivan Square. Vehicles leaving the parking area at Sullivan Square Station destined for Main Street westbound or Cambridge Street southbound will also use the Beacham Street Extension. These new movements on the Beacham Street Extension will alleviate some congestion at the Maffa Way/Cambridge Street intersection and the rotary.

The Proponent will also reconstruct the sidewalks along the west side of Sullivan Square to improve the pedestrian connection between the MBTA's Sullivan Square Station and the Project. Bicycle lanes along Cambridge Street will be incorporated into the Sullivan Square improvements and tie into the existing bicycle facilities in the rotary. The Proponent will also reconstruct the sidewalks on the east side of the rotary from Maffa Way to Main Street, including lighting and landscaping. All pedestrian improvements will be ADA-compliant. The Proponent will also provide landscape amenities in the center of the rotary, taking care to ensure that sight lines remain clear for motorists.

At the intersection of Rutherford Avenue and the Route 1 Ramps, the Proponent proposes to modify the signal timing during the Friday p.m. peak hour only. An overview of the proposed improvements is shown in

Figure 2-91A. Figures 2-91B, 2-91C, 2-91D, and 2-91E show the proposed improvements at 80-scale.

All of these improvements have been determined to be consistent with the City of Boston's long-term plan to improve Sullivan Square.

The Proponent will continue to collaborate with MassDOT, the MBTA, and BTD in the refinement of these proposed improvements as their design continues.

The City of Boston asked the Proponent to evaluate making Beacham Street a two-way street between Main Street and Arlington Street. Those evaluations revealed that this would have a negligible positive impact on the Sullivan Square/Rutherford Avenue area. In fact it was determined that this modification could, in fact, have negative consequences by inducing cut through traffic from Alford Street.

2.2.7.2 TRAFFIC ANALYSIS

The analyses described in Section 2.1.3, already reviewed by MassDOT and the BTD, show that the proposed improvements described in Section 2.2.7.1 will effectively mitigate the impacts of Project traffic on the Sullivan Square/Rutherford Avenue area.

The updated analysis is based on data collected in December 2014 at BTD's request.⁵

The proposed improvements will have a measurable positive effect on the operations of the Sullivan Square/Rutherford Avenue area.

The LOS at all signalized intersections will improve from at worst LOS F in the No Build Condition to no worse than LOS E in the Build with Mitigation Condition for all time periods.

The overall LOS of the Cambridge Street/I-93 northbound off-ramp will operate in the Build with Mitigation Condition at LOS C for all time periods, unchanged from the LOS for the No Build Condition.

The overall LOS of the main intersection of Sullivan Square, the intersection of Maffa Way, Cambridge Street, and Alford Street, will, in the Build with Mitigation Condition, improve to LOS E during the Friday

⁵ The analysis in the FEIR was based on estimated volumes in the City of Boston's Rutherford Avenue corridor study. However, those estimates assumed the complete implementation of the City of Boston's preferred long-term plan for Sullivan Square and Rutherford Avenue.

p.m. peak hour and LOS D during the Friday p.m. "real" peak hour, compared to LOS F under the No Build Condition. It will continue to operate at LOS D during the Saturday afternoon peak hour in the Build with Mitigation Condition, unchanged from the No Build Condition.

The newly signalized intersections of Cambridge Street, Spice Street, and Beacham Street Extension; Maffa Way and Beacham Street Extension; Main Street and Beacham Street; and Maffa Way and the MBTA bus only Entrance will all operate at LOS D or better in all three peak hours. These intersections are not signalized in the No Build Condition, therefore, there is no overall LOS to which to compare the Build with Mitigation.

The intersection of Rutherford Avenue and the Route 1 Ramps will operate at LOS E during the Friday p.m. peak hour and LOS D during the Friday p.m. "real" peak hour in the Build with Mitigation Condition which compares favorably with LOS E during both those peaks under the No Build Condition.

The CASTs for the Friday p.m. peak hour, Saturday afternoon peak hour, and Friday p.m. "real" peak hour are shown in Table 2-41, Table 2-42, and Table 2-43. Synchro and VISSIM output can be found in Appendix B.

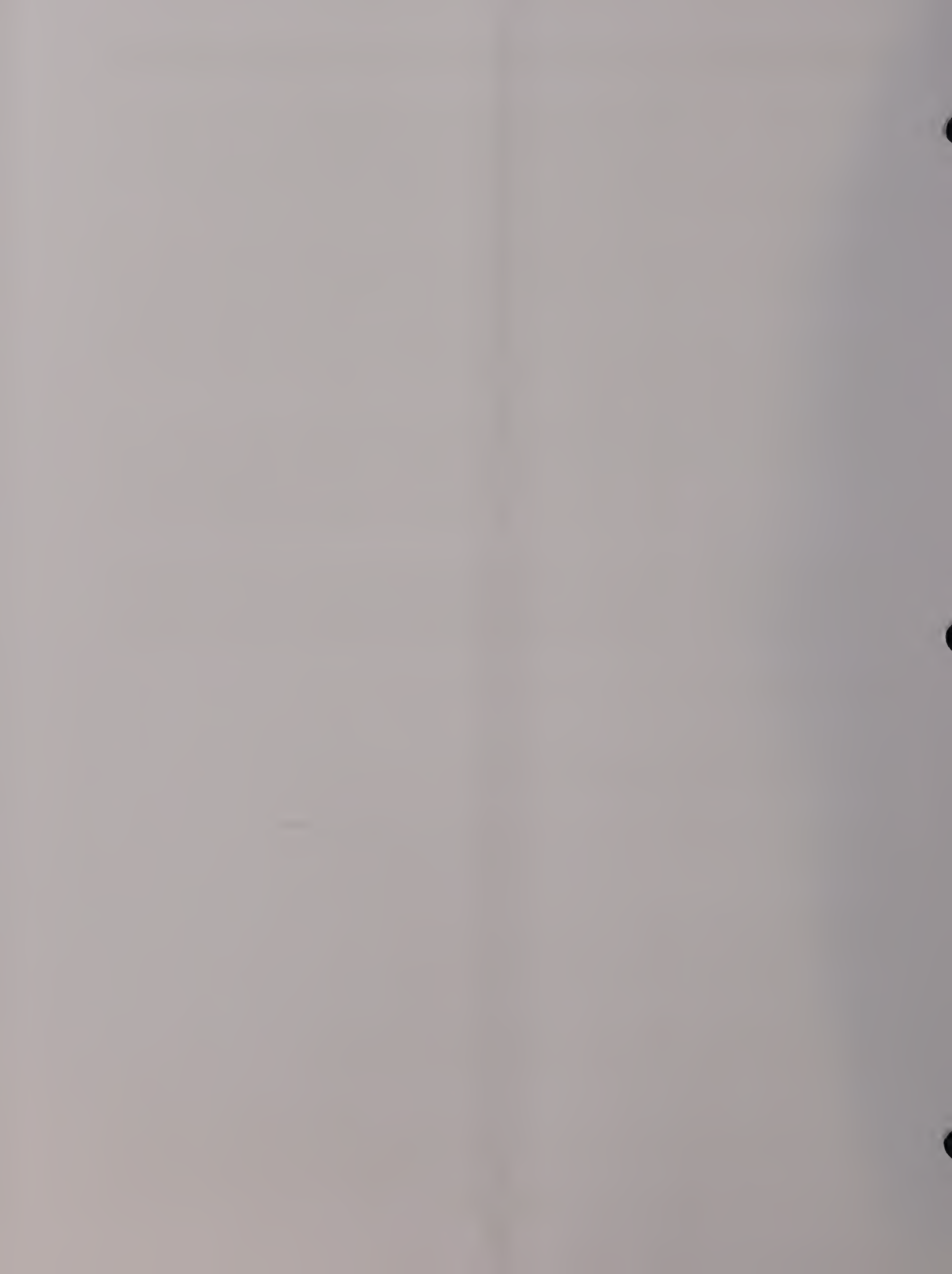


Table 2-41: Capacity Analysis Summary, Friday p.m. Peak Hour, Sullivan Square, Boston

Intersection	Existing (2013) Conditions						No Build (2023) Conditions						Build (2023) Conditions						Build (2023) with Mitigation Conditions						
	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	
52. (S) Cambridge Street/I-93 NB off-ramp	B	18.3	0.51	-	-	-	C	20.7	0.55	-	-	-	E	61.6	0.77	-	-	-	C	28.8	0.70	-	-	-	
Cambridge EB thru thru	A	9.5	0.38	134	212	590	B	11.3	0.38	156	251	590	B	13.9	0.42	193	302	590	C	22.4	0.54	250	418	590	
Cambridge WB thru thru	A	8.9	0.31	91	169	475	B	10.9	0.35	105	192	475	B	13.4	0.38	112	208	475	A	9.5	0.49	76	152	158	
I-93 NB off-ramp NB left	C	32.7	0.68	150	247	>800	C	30.3	0.64	177	360	>800	C	27.6	0.57	502	570	-	-	-	-	-	-	-	-
I-93 NB off-ramp NB left/right*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	>800	D	43.1	0.88	401	554	>800	
I-93 NB off-ramp NB right	D	41.9	0.81	164	290	>800	D	40.7	0.87	247	459	>800	F	186.0	1.31	515	535	>800	D	51.2	0.92	298	468	>800	
Sullivan Square Station driveway SB right	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	D	48.5	0.01	8	31	75	
53. (S) Main Street/Maffa Way/Cambridge Street/Alford Street (Sullivan Square)	D	41.6	0.89	-	-	-	F	84.8	1.07	-	-	-	F	140.4	1.22	-	-	-	E	66.8	1.14	-	-	-	
Maffa EB thru thru thru	D	45.4	0.88	350	472	>800	D	46.5	0.90	380	496	>800	D	48.9	0.92	404	516	>800	-	-	-	-	-	-	
Maffa EB thru thru thru/right*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	E	70.6	1.06	256	306	215	
Maffa EB [right]	C	30.1	0.18	44	80	195	C	30.1	0.18	54	128	195	C	30.0	0.19	54	131	195	-	-	-	-	-	-	
Cambridge NB right right	D	50.0	0.95	214	260	485	F	160.9	1.26	232	249	485	F	285.6	1.55	234	251	485	E	69.5	1.07	225	276	290	
Alford SB left left	D	54.5	0.64	115	185	330	E	75.3	0.91	202	302	330	E	75.9	0.91	203	296	330	F	95.6	1.02	186	272	700	
Alford SB thru thru	B	12.0	0.27	99	168	330	B	12.3	0.29	125	204	330	B	12.6	0.31	141	222	330	C	34.2	0.63	127	192	430	
58. (U/S*) Cambridge Street/Spice Street	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	B	14.4	0.59	-	-	-	
Cambridge EB left*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	A	8.8	0.57	113	220	175	
Cambridge EB [left]/thru thru/right	A	0.8	0.34	66	160	175	A	0.8	0.36	183	270	175	A	0.9	0.45	217	262	175	A	2.4	0.50	123	245	175	
Cambridge WB left/thru thru/right	A	1.0	0.21	12	54	210	A	1.1	0.23	184	264	210	A	1.5	0.24	30	112	210	B	11.6	0.54	110	186	210	
Spice NB left/thru/right	C	15.4	0.26	45	85	465	C	18.9	0.54	291	302	465	D	32.5	0.71	285	301	465	D	48.4	0.69	118	221	465	
Beacham Extension SB left/thru/right	B	13.4	0.02	1	8	100	C	20.0	0.02	2	9	100	D	27.4	0.03	1	7	100	D	53.0	0.17	42	89	350	
59. (S*) Maffa Way/Beacham Street Extension	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	A	9.5	0.60	-	-	-	
Maffa EB left/thru thru thru/right	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	A	6.9	0.59	184	291	300	
Beacham Extension NB thru/right	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	C	23.6	0.64	95	168	115	
60. (S*) Main Street/Beacham Street	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	D	43.8	0.82	-	-	-	
Main WB thru thru	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	D	49.7	1.06	61	162	>800	
Beacham Extension NB left	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	A	4.6	0.29	28	91	115	
Beacham Extension NB left/thru	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	A	4.6	0.29	49	109	115	
61. (S*) Maffa Way/MBTA Bus Only Entrance	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	A	4.0	0.48	-	-	-	
Maffa EB thru thru thru/right	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	A	2.5	0.45	221	255	>800	
Bus Only SB thru	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	E	79.3	0.94	44	79	115	

1. Queue shown is the longest reported average for the movement/approach. Queues derived from average of five SimTraffic simulations.

(S) signalized intersection (U) unsignalized intersection

* Indicates that lane/signal was added as part of Build – Mitigated condition. [] indicates that lane/movement was removed as part of Build – Mitigated condition.

Table 2-42: Capacity Analysis Summary, Saturday Afternoon Peak Hour, Sullivan Square, Boston

Intersection	Existing (2013) Conditions						No Build (2023) Conditions						Build (2023) Conditions						Build (2023) with Mitigation Conditions					
	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)
52. (S) Cambridge Street/I-93 NB off-ramp	C	25.9	0.51	-	-	-	C	29.5	0.56	-	-	-	F	126.3	0.81	-	-	-	C	28.5	0.67	-	-	-
Cambridge EB thru thru	B	11.5	0.26	105	172	590	B	12.4	0.28	113	188	590	B	12.6	0.30	115	179	590	C	25.0	0.45	191	317	590
Cambridge WB thru thru	B	11.5	0.26	82	153	475	B	12.4	0.29	175	218	475	B	12.5	0.30	93	173	475	B	16.0	0.45	98	162	475
I-93 NB off-ramp NB left	C	26.4	0.48	128	223	>800	C	26.1	0.49	177	388	>800	C	26.1	0.49	507	519	>800	-	-	-	-	-	-
I-93 NB off-ramp NB left/right*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	C	23.7	0.85	329	483	>800
I-93 NB off-ramp NB right	E	56.0	0.94	247	400	>800	E	66.9	0.99	314	520	>800	F	315.4	1.61	516	537	>800	C	38.5	0.88	241	394	>800
Sullivan Square Station driveway SB right	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	D	48.5	0.00	6	27	75
53. (S) Main Street/Maffa Way/Cambridge Street/Alford Street (Sullivan Square)	C	33.5	0.76	-	-	-	D	39.3	0.85	-	-	-	D	73.2	0.99	-	-	-	D	44.1	0.92	-	-	-
Maffa EB thru thru thru	D	40.6	0.78	298	397	>800	D	40.8	0.79	306	395	>800	D	41.5	0.82	327	431	>800	-	-	-	-	-	-
Maffa EB thru thru thru/right*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	D	36.8	0.91	236	294	215
Maffa EB [right]	C	30.5	0.11	39	69	195	C	30.3	0.13	43	73	195	C	30.1	0.14	44	75	195	-	-	-	-	-	-
Cambridge NB right right	C	31.4	0.78	185	256	485	D	45.2	0.93	211	257	485	F	127.4	1.19	224	258	485	E	61.0	1.03	148	218	290
Alford SB left left	D	51.5	0.61	114	190	330	E	55.8	0.74	145	209	330	D	53.8	0.65	138	204	330	D	47.6	0.66	141	213	700
Alford SB thru thru	A	9.6	0.18	80	146	330	B	10.1	0.19	87	151	330	B	10.7	0.21	91	160	330	C	21.1	0.32	84	135	430
58. (U/S*) Cambridge Street/Spice Street	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	A	8.2	0.40	-	-	-
Cambridge EB left*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	A	2.1	0.39	80	115	175
Cambridge EB [left]/thru thru/right	A	0.9	0.27	34	99	175	A	0.9	0.30	62	148	175	A	0.9	0.40	99	193	175	A	1.0	0.41	37	121	175
Cambridge WB left/thru thru/right	A	0.1	0.16	1	18	210	A	0.1	0.17	47	135	210	A	0.1	0.18	0	7	210	A	6.1	0.26	36	110	210
Spice NB left/thru/right	B	13.6	0.07	22	56	465	B	12.7	0.15	54	111	465	C	16.6	0.21	59	123	465	D	42.1	0.09	45	84	465
Sullivan Square Station SB left/thru/right	C	18.4	0.01	0	4	100	C	22.4	0.01	1	6	100	D	29.6	0.01	1	5	100	D	53.6	0.13	36	102	350
59. (S*) Maffa Way/Beacham Street Extension	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	A	7.3	0.52	-	-	-
Maffa EB left/thru thru thru/right	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	B	16.5	0.53	144	229	300
Beacham Extension NB thru/right	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	A	5.8	0.52	97	186	115
60. (S*) Main Street/Beacham Street	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	A	8.5	0.56	-	-	-
Main WB thru thru	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	A	9.7	0.70	171	253	>800
Beacham Extension NB left	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	A	1.5	0.22	30	68	115
Beacham Extension NB left/thru	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	A	1.5	0.22	33	70	115
61. (S*) Maffa Way/MBTA Bus Only Entrance	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	A	2.6	0.40	-	-	-
Maffa EB thru thru thru/right	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	A	2.3	0.39	47	136	>800
Bus Only SB thru	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	C	31.4	0.56	37	97	115

1. Queue shown is the longest reported average for the movement/approach. Queues derived from average of five SimTraffic simulations.
 (S) signalized intersection (U) unsignalized intersection
 * Indicates that lane/signal was added as part of Build – Mitigated condition. [] indicates that lane/movement was removed as part of Build – Mitigated condition.

Table 2-43: Capacity Analysis Summary, Friday p.m. "Real" Peak Hour, Sullivan Square, Boston

Intersection	Existing (2013) Conditions						No Build (2023) Conditions						Build (2023) Conditions						Build (2023) with Mitigation Conditions						
	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	
52. (S) Cambridge Street/I-93 NB off-ramp	B	18.3	0.51	-	-	-	C	20.7	0.55	-	-	-	D	35.0	0.67	-	-	-	C	25.9	0.65	-	-	-	
Cambridge EB thru thru	A	9.5	0.38	134	212	590	B	11.3	0.38	156	251	590	B	13.8	0.41	193	313	590	B	19.5	0.49	71	159	590	
Cambridge WB thru thru	A	8.9	0.31	91	169	475	B	10.9	0.35	105	192	475	B	13.3	0.38	115	207	475	A	7.7	0.44	77	139	475	
I-93 NB off-ramp NB left	C	32.7	0.68	150	247	>800	C	30.3	0.64	177	360	>800	C	27.6	0.57	487	618	>800	-	-	-	-	-	-	
I-93 NB off-ramp NB left/right*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	D	41.6	0.85	340	497	>800
I-93 NB off-ramp NB right	D	41.9	0.81	164	290	>800	D	40.7	0.87	247	459	>800	F	96.6	1.08	511	538	>800	D	49.3	0.89	242	394	>800	
Sullivan Square Station driveway SB right	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	D	48.7	0.01	16	57	-	
53. (S) Main Street/Maffa Way/Cambridge Street/Alford Street (Sullivan Square)	D	41.6	0.89	-	-	-	F	84.8	1.07	-	-	-	F	115.1	1.16	-	-	-	D	48.6	1.05	-	-	-	
Maffa EB thru thru thru	D	45.4	0.88	350	472	>800	D	46.5	0.90	380	496	>800	D	47.8	0.91	406	505	>800	-	-	-	-	-	-	
Maffa EB thru thru thru/right*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	E	59.8	1.03	255	316	>800	
Maffa EB [right]	C	30.1	0.18	44	80	195	C	30.1	0.18	54	128	195	C	30.0	0.19	47	97	195	-	-	-	-	-	-	
Cambridge NB right right	D	50.0	0.95	214	260	485	F	160.9	1.26	232	249	485	F	231.2	1.42	234	251	485	D	38.7	0.96	196	274	485	
Alford SB left left	D	54.5	0.64	111	185	330	E	75.3	0.91	202	302	330	E	75.8	0.91	201	284	330	E	64.7	0.90	163	232	330	
Alford SB thru thru	B	12.0	0.27	99	168	330	B	12.3	0.29	125	204	330	B	12.4	0.30	142	213	330	C	32.0	0.62	119	178	330	
58. (U/S*) Cambridge Street/Spice Street	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	B	17.9	0.57	-	-	-	
Cambridge EB left*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	A	8.5	0.57	106	194	175	
Cambridge EB [left]/thru thru/right	A	0.8	0.34	66	160	175	A	0.8	0.36	183	270	175	A	0.8	0.42	217	258	175	A	2.2	0.44	91	193	175	
Cambridge WB left/thru thru/right	A	1.0	0.21	12	54	210	A	1.1	0.23	184	264	210	A	1.3	0.23	23	103	210	B	14.1	0.48	97	175	210	
Spice NB left/thru/right	C	15.4	0.26	45	85	465	C	18.9	0.54	291	302	465	C	24.2	0.62	286	298	465	D	45.8	0.60	94	179	465	
Beacham Extension SB left/thru/right	B	13.4	0.02	1	8	100	C	20.0	0.02	2	9	100	C	23.3	0.02	1	9	100	F	85.2	0.18	42	87	330	
59. (S*) Maffa Way/Beacham Street Extension	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	A	9.9	0.59	-	-	-	
Maffa EB left/thru thru thru/right	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	C	21.8	0.64	114	208	300	
Beacham Extension NB thru/right	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	A	7.7	0.57	160	252	115	
60. (S*) Main Street/Beacham Street	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	C	23.2	0.76	-	-	-	
Main WB thru thru	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	C	26.7	0.98	215	265	>800	
Beacham Extension NB left	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	A	2.1	0.29	43	77	115	
Beacham Extension NB left/thru	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	A	2.1	0.29	43	79	115	
61. (S*) Maffa Way/MBTA Bus Only Entrance	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	A	3.9	0.47	-	-	-	
Maffa EB thru thru thru/right	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	A	2.6	0.45	62	159	>800	
Bus Only SB thru	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	E	68.7	0.84	55	116	115	

1. Queue shown is the longest reported average for the movement/approach. Queues derived from average of five SimTraffic simulations.

(S) signalized intersection (U) unsignalized intersection

* Indicates that lane/signal was added as part of Build – Mitigated condition. □ indicates that lane/movement was removed as part of Build – Mitigated condition.

Table 2-44: Capacity Analysis Summary, Friday p.m. Peak Hour, Rutherford Avenue, Boston

Intersection	Existing (2013) Conditions						No Build (2023) Conditions						Build (2023) Conditions						Build (2023) with Mitigation Conditions					
	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)
54. (S) Austin Street/New Rutherford Avenue (Route 99)	D	54.1	0.83	–	–	–	E	63.8	0.92	–	–	–	E	63.8	0.92	–	–	–	No Mitigation Required					
Gilmore Bridge EB left**	D	48.9	0.86	479	645	>800	F	83.6	1.03	568	609	>800	F	83.6	1.03	558	640	>800						
Gilmore Bridge EB thru	C	28.4	0.36	293	622	>800	C	31.6	0.42	526	723	>800	C	31.6	0.42	488	742	>800						
Gilmore Bridge EB right	C	28.3	0.35	50	214	200	C	31.3	0.39	77	267	200	C	31.3	0.39	94	292	200						
Austin WB left/thru thru/right	E	70.5	0.70	152	229	>800	E	70.7	0.72	165	251	>800	E	70.7	0.72	159	244	>800						
New Rutherford NB left	E	78.9	0.80	144	241	775	E	78.9	0.80	148	240	775	E	78.9	0.80	151	241	775						
New Rutherford NB thru/right	E	78.3	0.78	145	266	475	E	78.3	0.78	167	302	475	E	78.3	0.78	153	274	475						
New Rutherford SB left/thru	E	56.1	0.32	545	852	800	D	53.6	0.31	532	856	800	D	53.6	0.31	556	842	800						
New Rutherford SB right right	E	79.7	0.89	624	641	100	F	81.5	0.92	625	638	100	F	81.5	0.92	625	635	100						
55. (S) New Rutherford Avenue (Route 99)/Route 1 Ramps	D	45.2	0.79	–	–	–	E	55.5	0.84	–	–	–	F	80.7	0.89	–	–	–	E	56.2	0.89	–	–	–
New Rutherford EB thru thru thru thru	D	49.3	0.85	428	609	>800	E	62.2	0.97	508	607	>800	F	113.1	1.13	509	580	>800	E	63.4	0.99	507	584	>800
New Rutherford EB right	E	56.3	0.77	190	255	150	F	83.5	0.97	200	204	150	F	119.5	1.10	198	232	150	E	77.2	0.96	198	223	150
New Rutherford WB left	E	59.2	0.87	449	457	400	E	58.9	0.90	449	455	400	E	59.0	0.90	450	450	400	E	75.7	0.98	450	451	400
New Rutherford WB thru thru thru	C	27.0	0.32	844	1033	>800	C	30.2	0.36	855	1018	>800	C	30.7	0.40	867	921	>800	C	25.4	0.37	872	885	>800
Route 1 ramp NB left left	D	52.4	0.64	140	212	>800	D	52.8	0.63	140	210	>800	D	52.8	0.63	144	211	>800	D	52.8	0.63	141	210	>800
Route 1 ramp NB right right	B	11.7	0.12	15	79	100	B	11.7	0.11	17	88	100	B	11.8	0.11	18	86	100	B	13.6	0.11	19	90	100
56. (S) New Rutherford Avenue (Route 99)/Chelsea Street (City Square)	C	31.2	0.69	–	–	–	D	43.1	0.74	–	–	–	D	41.3	0.76	–	–	–	No Mitigation Required					
New Rutherford EB left	E	71.9	0.70	120	211	200	E	71.7	0.72	116	199	200	E	68.0	0.72	116	209	200						
New Rutherford EB thru thru thru	B	10.5	0.45	109	201	800	B	13.2	0.50	105	188	800	B	14.4	0.56	123	248	800						
New Rutherford EB right	D	42.9	0.28	88	287	800	F	122.5	0.37	120	383	800	F	97.7	0.60	168	499	800						
New Rutherford WB thru thru thru	C	29.3	0.55	615	879	>800	C	31.9	0.63	716	981	>800	C	33.2	0.68	737	980	>800						
New Rutherford WB right	C	26.3	0.31	54	201	250	C	27.7	0.32	83	262	250	C	28.0	0.34	91	281	250						
Chelsea SB left	D	49.9	0.86	159	335	200	D	51.0	0.87	120	300	200	D	51.0	0.87	116	298	200						
Chelsea SB thru	D	35.4	0.61	478	759	475	D	35.0	0.62	427	797	475	D	35.0	0.62	422	786	475						
Chelsea SB right	C	28.5	0.15	461	756	475	C	27.8	0.15	500	742	475	C	27.8	0.15	503	739	475						

1. Queue shown is the longest reported average for the movement/approach. Queues derived from average of five SimTraffic simulations.

(S) signalized intersection (U) unsignalized intersection

* Indicates that lane/signal was added as part of Build – Mitigated condition. □ indicates that lane/movement was removed as part of Build – Mitigated condition.

** de facto turn lane

Table 2-45: Capacity Analysis Summary, Saturday Afternoon, Peak Hour, Rutherford Avenue, Boston

Intersection	Existing (2013) Conditions						No Build (2023) Conditions						Build (2023) Conditions						Build (2023) with Mitigation Conditions						
	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	
54. (S) Austin Street/New Rutherford Avenue (Route 99)	D	49.5	0.63	–	–	–	D	51.1	0.68	–	–	–	D	51.1	0.68	–	–	–							
Gilmore Bridge EB left/thru thru	C	33.3	0.48	399	563	>800	D	37.2	0.57	511	652	>800	D	37.2	0.57	441	594	>800							
Gilmore Bridge EB right	C	33.2	0.42	29	160	200	D	37.8	0.53	65	245	200	D	37.8	0.53	58	232	200							
Austin WB left/thru thru/right	E	69.3	0.69	171	250	>800	E	70.4	0.71	168	243	>800	E	70.4	0.71	181	276	>800							
New Rutherford NB left	E	77.4	0.77	128	218	775	E	78.1	0.79	147	252	775	E	78.1	0.79	144	245	775							
New Rutherford NB thru/right	E	62.6	0.53	101	185	475	E	62.7	0.54	100	187	475	E	62.7	0.54	102	217	475							
New Rutherford SB left/thru	D	51.6	0.34	422	851	800	D	49.8	0.33	587	804	800	D	49.8	0.33	605	750	800							
New Rutherford SB right right	E	65.6	0.81	597	716	100	E	64.2	0.82	628	652	100	E	64.2	0.82	630	640	100							
55. (S) New Rutherford Avenue (Route 99)/Route 1 Ramps	C	25.6	0.58	–	–	–	C	25.4	0.61	–	–	–	C	25.1	0.66	–	–	–							
New Rutherford EB thru thru thru thru	B	19.7	0.47	233	406	>800	C	20.1	0.51	282	498	>800	C	21.8	0.61	455	640	>800							
New Rutherford EB right	B	19.2	0.37	111	268	150	B	19.9	0.42	149	285	150	C	20.8	0.47	185	268	150							
New Rutherford WB left	E	72.1	0.79	247	369	400	E	73.3	0.80	264	401	400	E	73.0	0.80	302	477	400							
New Rutherford WB thru thru thru	A	5.9	0.14	41	79	>800	A	5.1	0.15	46	139	>800	D	4.7	0.20	69	311	>800							
Route 1 ramp NB left left	D	53.6	0.60	127	185	>800	D	53.1	0.60	138	207	>800	D	53.1	0.60	135	209	>800							
Route 1 ramp NB right right	C	21.8	0.16	12	64	100	C	22.2	0.17	16	77	100	C	22.2	0.18	2	22	100							
56. (S) New Rutherford Avenue (Route 99)/Chelsea Street (City Square)	D	48.0	0.58	–	–	–	D	45.6	0.65	–	–	–	D	46.7	0.78	–	–	–							
New Rutherford EB left	E	60.2	0.74	133	228	200	E	61.1	0.75	147	241	200	E	59.2	0.75	145	243	200							
New Rutherford EB thru thru thru	B	19.5	0.36	107	184	800	C	22.1	0.39	121	224	800	C	25.6	0.46	151	353	800							
New Rutherford EB right	F	122.8	0.41	296	486	800	F	101.2	0.53	362	577	800	F	98.6	0.78	534	699	800							
New Rutherford WB thru thru thru	C	20.3	0.28	177	289	>800	C	22.2	0.33	216	328	>800	C	23.1	0.39	262	419	>800							
New Rutherford WB right	B	19.9	0.19	11	77	250	C	21.3	0.20	12	84	250	C	21.3	0.20	15	91	250							
Chelsea SB left	D	53.3	0.79	197	274	200	D	52.6	0.79	216	282	200	D	52.6	0.79	223	284	200							
Chelsea SB thru	D	43.8	0.66	220	391	475	D	42.9	0.66	255	454	475	D	42.9	0.66	315	550	475							
Chelsea SB right	C	34.6	0.08	71	131	475	C	33.7	0.08	80	161	475	C	33.7	0.08	84	142	475							

1. Queue shown is the longest reported average for the movement/approach. Queues derived from average of five SimTraffic simulations.

(S) signalized intersection (U) unsignalized intersection

* Indicates that lane/signal was added as part of Build – Mitigated condition. [] indicates that lane/movement was removed as part of Build – Mitigated condition.

Table 2-46: Capacity Analysis Summary, Friday p.m. "Real" Peak Hour, Rutherford Avenue, Boston

Intersection	Existing (2013) Conditions						No Build (2023) Conditions						Build (2023) Conditions						Build (2023) with Mitigation Conditions					
	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)	LOS	Delay (s)	V/C	50% Queue Length ¹ (ft)	95% Queue Length ¹ (ft)	Storage Area (ft)
54. (S) Austin Street/New Rutherford Avenue (Route 99)	D	54.1	0.83	–	–	–	E	63.8	0.92	–	–	–	E	63.8	0.92	–	–	–	No Mitigation Required					
Gilmore Bridge EB left**	D	48.9	0.86	479	645	>800	F	83.6	1.03	568	609	>800	F	83.6	1.03	568	602	>800						
Gilmore Bridge EB thru	C	28.4	0.36	293	622	>800	C	31.6	0.42	526	723	>800	C	31.6	0.42	505	737	>800						
Gilmore Bridge EB right	C	28.3	0.35	50	214	200	C	31.3	0.39	77	267	200	C	31.3	0.39	76	265	200						
Austin WB left/thru thru/right	E	70.5	0.70	152	229	>800	E	70.7	0.72	165	251	>800	E	70.7	0.72	154	224	>800						
New Rutherford NB left	E	78.9	0.80	144	241	775	E	78.9	0.80	148	240	775	E	78.9	0.80	140	224	775						
New Rutherford NB thru/right	E	78.3	0.78	145	266	475	E	78.3	0.78	167	302	475	E	78.3	0.78	142	265	475						
New Rutherford SB left/thru	E	56.1	0.32	545	852	800	D	53.6	0.31	532	856	800	D	53.6	0.31	548	839	800						
New Rutherford SB right right	E	79.7	0.89	624	641	100	F	81.5	0.92	625	638	100	F	81.5	0.92	625	634	100						
55. (S) New Rutherford Avenue (Route 99)/Route 1 Ramps	D	45.2	0.79	–	–	–	E	55.5	0.84	–	–	–	E	68.5	0.87	–	–	–	D	51.2	0.87	–	–	–
New Rutherford EB thru thru thru thru	D	49.3	0.85	428	609	>800	E	62.2	0.97	508	607	>800	F	88.3	1.07	507	599	>800	D	53.5	0.94	592	633	>800
New Rutherford EB right	E	56.3	0.77	190	255	150	F	83.5	0.97	200	204	150	F	104.0	1.05	199	223	150	E	69.3	0.92	198	223	150
New Rutherford WB left	E	59.2	0.87	449	457	400	E	58.9	0.90	449	455	400	E	59.0	0.90	450	450	400	E	75.5	0.98	450	450	400
New Rutherford WB thru thru thru	C	27.0	0.32	844	1033	>800	C	30.2	0.36	855	1018	>800	C	30.3	0.38	873	886	>800	C	24.8	0.35	873	882	>800
Route 1 ramp NB left left	D	52.4	0.64	140	212	>800	D	52.8	0.63	140	210	>800	D	52.8	0.63	141	206	>800	D	52.8	0.63	138	203	>800
Route 1 ramp NB right right	B	11.7	0.12	15	79	100	B	11.7	0.11	17	88	100	B	11.8	0.11	4	36	100	B	13.6	0.11	14	78	100
56. (S) New Rutherford Avenue (Route 99)/Chelsea Street (City Square)	C	31.2	0.69	–	–	–	D	43.1	0.74	–	–	–	D	41.4	0.75	–	–	–	No Mitigation Required					
New Rutherford EB left	E	71.9	0.70	120	211	200	E	71.7	0.72	116	199	200	E	70.4	0.72	115	198	200						
New Rutherford EB thru thru thru	B	10.5	0.45	109	201	800	B	13.2	0.50	105	188	800	B	14.2	0.53	111	193	800						
New Rutherford EB right	D	42.9	0.28	88	287	800	F	122.5	0.37	120	383	800	F	102.0	0.50	114	360	800						
New Rutherford WB thru thru thru	C	29.3	0.55	615	879	>800	C	31.9	0.63	716	981	>800	C	32.6	0.66	778	976	>800						
New Rutherford WB right	C	26.3	0.31	54	201	250	C	27.7	0.32	83	262	250	C	27.7	0.32	117	312	250						
Chelsea SB left	D	49.9	0.86	159	335	200	D	51.0	0.87	120	300	200	D	51.0	0.87	85	249	200						
Chelsea SB thru	D	35.4	0.61	478	759	475	D	35.0	0.62	427	797	475	D	35.0	0.62	470	812	475						
Chelsea SB right	C	28.5	0.15	461	756	475	C	27.8	0.15	500	742	475	C	27.8	0.15	554	657	475						

1. Queue shown is the longest reported average for the movement/approach. Queues derived from average of five SimTraffic simulations.

(S) signalized intersection (U) unsignalized intersection

* Indicates that lane/signal was added as part of Build – Mitigated condition. [] indicates that lane/movement was removed as part of Build – Mitigated condition.

** de facto turn lane

2.2.7.3 LONG-TERM PLANNING

The Proponent recognizes that the City of Boston has been working for a number of years toward implementing a long-term vision for Sullivan Square and Rutherford Avenue. In March 2012, the City of Boston established a preferred alternative for the Rutherford Avenue corridor, including Sullivan Square.

As is discussed in Section 2.2.7.1, the Proponent has proposed mitigation for the Project's impacts that are consistent with the City of Boston's long-term vision for the Sullivan Square/Rutherford Avenue area. In fact, the Proponent's plan incorporates elements of the City's long-term vision, including using the MBTA Busway (Beacham Street Extension) as a public street to connect between Cambridge Street and Maffa Way. It also incorporates reconstructing Spice Street and D Street to allow vehicles an alternate route around the main point of congestion in Sullivan Square, the intersection of Cambridge Street/Maffa Way/Alford Street.

Pursuant to the terms of its Gaming License, the Proponent has agreed to make a payment equal to \$25 million toward the cost of implementing a long-term solution for Sullivan Square and Rutherford Avenue. The Proponent looks forward to continuing to work with the City of Boston, state agencies, and neighboring communities to realize a positive long-term vision for the area.

2.3 PARKING EVALUATIONS AND OUTCOMES SINCE FEIR

As requested in the Secretary's Certificate, the Proponent has reevaluated the parking demand of the Project. This section includes additional information about the derivation of the operational capacity percentages used in the parking evaluation, justification of the underlying assumptions about the length of stay and arrival patterns of Project patrons, and a reanalysis of the parking capacity necessary to meet patron service expectations. As a result of these reevaluations, as indicated in Section 1.2.2, the Proponent has eliminated 300 spaces in the Project garage, reducing the total number of spaces in the garage to 3,400. The reevaluations presented in this section evidence the Proponent's commitment to balancing the expectations of Project patrons with the promotion of alternatives to the use of SOVs.

2.3.1 PLANNED PARKING FACILITIES

The Project design as refined includes the following parking accommodations:

- An on-site, underground parking garage with 3,400 spaces to serve Project patrons and visitors to the open space and waterfront facilities;
- No employee parking will be provided on-site except a limited number of spaces for Wynn executives and employees with disabilities;
- Employees using SOVs to travel to work will be required to park at designated off-site locations and ride a shuttle bus to the Project Site. The employee shuttle buses will be operated by the Proponent (or contracted through a third party vendor) and will be a free service for employees of the Project validated by their security badges;
- The proposed employee parking locations are shown in Figure 2-92. The Proponent plans to lease up to 800 spaces at three off-site parking facilities to accommodate employee parking and has confirmed with the operators that sufficient capacity is available at the potential lease locations to accommodate the number of spaces referenced;
- The Proponent plans to operate a 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. Massport has indicated that there may be sufficient excess parking at its facilities to accommodate this proposed service. If spaces are not available at a Massport's Logan Express parking facility, the Proponent will lease space at a parking facility proximate to Massport's Logan Express facilities to service the Premium Park and Ride service; and
- The Proponent will evaluate a revenue control system for the underground parking garage and will evaluate pricing strategies for managing parking in a manner that will appropriately serve visitors to the resort while also supporting the goal of reducing SOV automobile trips to the Project Site. These strategies will include the establishment of strategies that will discourage parking at the Project Site during peak traffic and parking demand periods, and providing guest rewards for arriving at the Project Site by means of modes of other than an SOV.

2.3.2 SUMMARY OF PARKING DEMAND ANALYSIS

Because employees will be required to park off-site and ride a free shuttle bus that will be operated by the Proponent to the Project Site, patron and employee parking demands were calculated separately.

Peak Employee Parking Demand

As shown in Table 2-47, the peak employee demand will be approximately 365 parking spaces, forecast to occur at approximately 7:00 p.m. on a weekend in December. It should be noted 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.

Peak Patron Parking Demand

As shown in Table 2-47, the Project is estimated to require a minimum of 2,360 spaces to accommodate patron parking during the peak patron parking demand period (expected to occur at approximately 7:00 p.m. on a weekend in August). Note that the calculated parking demand represents the accumulation of parking that occurs during the analysis period, reflective of the duration of stay of patrons at the Project, and does not directly correlate to the number of vehicles arriving at the respective parking locations.

The calculated patron parking demand for the Project is equivalent to a parking ratio of approximately 0.52 spaces per gaming position. As further described below, management of parking operations and the setting aside of on-site parking spaces for certain TDM measures results in greater actual peak parking space needs for patrons. As a result, the Project will provide 3,400 parking spaces, or a parking ratio of approximately 0.74 spaces per gaming position. For context, the average parking supply provided to support similar gaming resorts is approximately 1.01 spaces per gaming position, which, if it were applied to the Project, would result in a parking supply of approximately 4,626 spaces.

Table 2-47: Parking Distribution during Peak Parking Demand Period

Land Use	Patron 7:00 p.m. Weekend in August	Employee 7:00 p.m. Weekend in December
Casino	1,449	221
Restaurants	411	87
Spa/Gym	15	2
Retail	58	19
Hotel	380	36
Conference Space	47	0
Total	2,360	365

Operational Issues Relating to Parking Occupancy

While the estimated peak patron occupancy of 2,360 spaces is less than the planned supply of 3,400 on-site spaces, the residual capacity is needed to allow the Proponent to manage parking operation issues that are not captured in the shared parking analysis and which effectively decrease the available parking supply for the general user.

In practice, the operational capacity of a parking facility is about 85% of total capacity, reflecting the fact that when occupancy exceeds this level, new potential parkers struggle to find the remaining empty spaces and circulate inefficiently through the facility, resulting in frustration and a negative experience for patrons. The overall effective capacity of the Project garage is, therefore, about 2,890 spaces.

In addition, 45 spaces will be designated for patrons and employees with disabilities, and 253 spaces will be designated for alternative fuel vehicles and carpools/vanpools (173 spaces), car sharing services (10 spaces) and electric vehicle charging (70 spaces). These 298 spaces are essentially “reserved” for the appropriate type of parker/vehicle and cannot be counted as “shared” spaces. Subtracting these from the effective capacity of 2,890 spaces yields an operational capacity for general users of about 2,592 spaces.

Accordingly, when the above-described effective general use capacity of 2,592 spaces is used as the baseline, the peak parking demand of 2,360 will utilize about 91% of the spaces. Providing some incremental parking (in this case, 9%) in excess of estimated peak demand is prudent in order to allow for parking inefficiencies such as improper positioning of vehicles within marked spaces and to allow drivers some choice of parking location within the garage (i.e. parking close to a set of elevators that serve their final destination (retail or casino)). The foregoing is essential to the guest experience and the Proponent’s ability to attract repeat patrons.

The Secretary’s Certificate asked that the SFEIR address whether on-site parking could be banked until warranted by actual patron parking demand. It is important to note that, as discussed in Section 1.2.1, the Project will be developed in a single phase. Though it is unusual that a Project of this magnitude is constructed and opened in a single phase, it will mean that the estimated Project parking demands will occur upon opening. In addition, since the Project parking garage will be constructed first, it is not possible to defer physical construction of the parking supply anticipated to be needed to meet Project demand. However, based on the reevaluation of the Project parking demand, the number of spaces in the Project garage has been reduced by 300 spaces.

2.3.3 METHODOLOGY AND ASSUMPTIONS

As detailed in the FEIR, the parking demand analysis for the Project was performed following the methodologies outlined in the Urban Land Institute's (ULI's) *Shared Parking*⁶ manual and adjusted to account for: i) the interaction of uses within the Project Site; and ii) the availability of alternative modes of transportation (i.e., public transportation use, pedestrians, and bicycles). With specific regard to the gaming component of the Project, parking demand data was obtained from a study conducted by Walker Parking Consultants for the Hollywood Park Redevelopment project in Inglewood, California. The methodology accounts for: i) patron length of stay; ii) the interaction between uses within the site; and iii) time of arrival and departure of patrons and employees.

The ULI has established a defined procedure for the completion of a parking demand analysis based on a scientific method that incorporates data and research for mixed-use developments.

Step 1: Project land use identification. The individual components of the Project were identified and classified with a specific land use category and size. Given the distinct parking demands attributable to specific types of land uses, the land use categories identified for the parking demand analysis require further disaggregation of the more general categories adopted for the trip generation calculations. As a result of this methodology, the land use quantities adopted for the parking analysis are summarized below and are consistent with the Project design as refined and as presented in Section 1.2.2.

Step 2: Development of base parking demands for each land use. The base (unadjusted) parking demand was calculated using information obtained from ULI for non-gaming land uses and from a Walker Parking Consultants study for the Hollywood Park Redevelopment for the casino land use. Table 2-48 summarizes the base parking demand ratios applied to the Project, which reflect patron length of stay and employee shift durations for the respective land uses.

⁶Urban Land Institute, *Shared Parking*, Second Edition (Washington, D.C.; 2005).

Table 2-48: Base Parking Demand

Land Use	Base Parking Demand (Patrons/Employees)		Independent Variable	Project Component Size
	Weekday	Weekend		
Casino	10.94/2.79	12.03/2.71	1,000 sf	190,461 sf
Hotel	0.9/0.25	1.0/0.18	room	629 rooms
Conference Space	20.0/0.0	10.0/0.0	1,000 sf	37,068 sf
Spa/Gym	6.6/0.4	5.5/0.25	1,000 sf	15,405 sf
Retail	2.9/0.7	3.2/0.8	1,000 sf	51,783 sf
Fine Dining	15.25/2.75	17.0/3.0	1,000 sf	17,277 sf
Fast-food Restaurant	12.75/2.25	12.0/2.0	1,000 sf	6,216 sf
Family Restaurant	9.0/1.5	12.75/2.25	1,000 sf	40,334 sf

Step 3: Application of monthly adjustment factors to the base parking demand for each land use. Monthly adjustment factors account for the variation in parking demand for specific land uses that occurs over the course of a year on a monthly basis. By way of example, retail peak parking demands occur in December (100%), with the demand for parking in January approximately 50% of the December demand. The monthly adjustment factors are applied to the calculated base parking demand and were obtained from the recommended values contained in the *ULI Shared Parking* manual and from the Walker Parking Consultants study for the gaming (casino) component of the Project. Table 2-49 summarizes the monthly adjustment factors that were applied to each of the individual land uses within the Project.

Table 2-49: Monthly Adjustment Factors

Land Use	January	February	March	April	May	June	July	August	September	October	November	December	Late December ¹⁾
Casino: Patron	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Hotel: Patron	90%	100%	100%	100%	90%	90%	100%	100%	75%	75%	75%	50%	100%
	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Conference Space: Patron	75%	100%	90%	55%	60%	50%	45%	75%	80%	85%	100%	60%	60%
	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Spa/Gym: Patron	100%	95%	85%	70%	65%	65%	65%	70%	80%	85%	85%	90%	95%
	100%	100%	95%	80%	75%	75%	75%	80%	90%	95%	95%	100%	100%
Retail: Patron	56%	57%	64%	63%	66%	67%	64%	69%	64%	66%	72%	100%	80%
	80%	80%	80%	80%	80%	80%	80%	80%	80%	80%	90%	100%	90%
Fine Dining: Patron	85%	86%	95%	92%	96%	95%	98%	99%	91%	96%	93%	100%	95%
	95%	95%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Fast-food Restaurant: Patron	85%	86%	95%	92%	96%	95%	98%	99%	91%	96%	93%	100%	95%
	95%	95%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Family Restaurant: Patron	85%	86%	95%	92%	96%	95%	98%	99%	91%	96%	93%	100%	95%
	95%	95%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%

1) Late December = December 25-31.

Step 4: Application of time-of-day adjustment factors to the monthly adjusted parking demand. Time of day adjustment factors account for the variation in parking demands that occur for a specific land use over the course of the day and reflect: i) arrival and departure patterns over the course of the day; and ii) parking accumulation for each use which is an indirect measurement of length of stay for both patrons and employees. The time-of-day adjustment factors are applied to the monthly adjusted parking ratios and were also obtained from the recommended values contained in the ULI Shared Parking manual and from the Walker Parking Consultants study. Table 2-50 and Table 2-51 summarize the weekday and weekend time-of-day adjustment factors that were applied to each of the uses to be located within the Project Site.

Step 5: Application of modal split and vehicle occupancy ratio adjustments to the adjusted parking demand. Mode share adjustment factors are used to account for the reduction in parking demand associated with the use of available alternative travel (vs. SOVs) including water transportation, the MBTA Orange Line and local buses, tour buses, the PPR service, and pedestrian/bicycle travel. Reflecting the non-automobile mode shares presented in Appendix B, a 37% adjustment factor for patrons was applied to the base parking demand during the peak period (7:00 a.m. to 7:00 p.m.), with a 29% adjustment factor applied to the parking demand during the off-peak period (7:00 p.m. to 7:00 a.m.) to reflect the reduced public transportation service schedule during the off-peak hours.

For employees, a 59% adjustment factor was applied to the base parking demand during the peak period (7:00 a.m. to 7:00 p.m.), with a 42% adjustment factor applied to the parking demand during the off-peak period (7:00 p.m. to 7:00 a.m.), again to reflect the reduced public transportation service schedule during the off-peak hours. The higher use of public transportation by employees vs. patrons and guests is reflective of the expanded incentives that will be offered by the Proponent to employees to encourage use of public transportation. As stated previously, all employees will be required to park at off-site locations

Step 6: Application of non-captive adjustment factors to the adjusted parking demand. Non-captive adjustment factors are applied to the adjusted base parking demand in order to account for the use of parking within a development for a single purpose or land use when multiple uses are present within a common site. By way of example, if a 90% non-captive adjustment were applied to the parking demand for a restaurant use within a mixed use development, it is assumed that 10% of the parking demands associated with the restaurant are reflected in the parking demands for another use within the development, such as an office building where the employees would walk to a nearby restaurant for lunch. In such an instance, the remaining 10% of the parking demand for the restaurant would be accounted for in the calculated parking demand for the office building. The non-captive adjustment

factors were based on engineering judgment and are reflective of the destination nature of the Project and the traffic characteristics of the various components of the Project. Table 2-52 summarizes the non-captive adjustment factors that were applied to the individual components of the Project.

Table 2-50: Time of Day Factors – Weekday

Land Use	6:00 a.m.	7:00 a.m.	8:00 a.m.	9:00 a.m.	10:00 a.m.	11:00 a.m.	12:00 p.m.	1:00 p.m.	2:00 p.m.	3:00 p.m.	4:00 p.m.	5:00 p.m.	6:00 p.m.	7:00 p.m.	8:00 p.m.	9:00 p.m.	10:00 p.m.	11:00 p.m.	12:00 a.m.	
Casino: Patron Employee	14% 29%	13% 29%	11% 32%	18% 32%	28% 37%	40% 43%	65% 50%	79% 74%	79% 79%	75% 84%	72% 84%	65% 85%	78% 76%	89% 71%	89% 73%	95% 73%	100% 73%	97% 71%	93% 68%	
Hotel: Patron Employee	95% 5%	95% 30%	90% 90%	80% 90%	70% 100%	70% 100%	65% 100%	65% 100%	70% 100%	70% 100%	75% 90%	80% 70%	85% 40%	85% 20%	90% 20%	95% 20%	95% 20%	100% 10%	100% 5%	
Conference Space: Patron Employee	0% 0%	0% 0%	50% 0%	100% 0%	100% 0%	100% 0%	100% 0%	100% 0%	100% 0%	100% 0%	100% 0%	100% 0%	50% 0%	30% 0%	30% 0%	10% 0%	0% 0%	0% 0%	0% 0%	
Spa/Gym: Patron Employee	70% 75%	40% 75%	40% 75%	70% 75%	70% 75%	80% 75%	60% 75%	70% 75%	70% 75%	70% 75%	80% 75%	90% 100%	100% 100%	100% 100%	90% 50%	80% 50%	70% 20%	35% 20%	10% 20%	0% 0%
Retail: Patron Employee	1% 10%	5% 15%	15% 40%	35% 75%	65% 85%	85% 95%	95% 100%	100% 100%	95% 100%	90% 100%	90% 100%	95% 95%	95% 95%	95% 95%	95% 95%	80% 90%	50% 75%	30% 40%	10% 15%	0% 0%
Peak December ²⁾ Patron Employee	1% 10%	5% 15%	15% 40%	30% 75%	55% 85%	75% 95%	90% 100%	100% 100%	100% 100%	100% 100%	95% 100%	85% 95%	80% 95%	75% 95%	65% 90%	50% 75%	30% 40%	30% 40%	10% 15%	0% 0%
Late December ³⁾ Patron Employee	1% 10%	5% 15%	10% 40%	20% 75%	40% 85%	65% 95%	90% 100%	100% 100%	100% 100%	100% 100%	95% 100%	85% 95%	70% 95%	55% 95%	40% 90%	25% 75%	15% 40%	15% 40%	5% 15%	0% 0%
Fine Dining: Patron Employee	0% 0%	0% 0%	0% 0%	0% 0%	0% 0%	0% 0%	0% 0%	0% 0%	0% 20%	0% 50%	0% 75%	60% 90%	90% 100%	95% 100%	100% 100%	90% 100%	90% 100%	90% 85%	90% 50%	50% 50%
Fast-food Restaurant: Patron Employee	5% 15%	10% 20%	20% 30%	30% 40%	55% 75%	85% 100%	100% 100%	100% 100%	90% 95%	60% 70%	55% 60%	60% 70%	85% 90%	80% 90%	50% 60%	30% 40%	20% 30%	20% 30%	10% 20%	5% 20%
Family Restaurant: Patron Employee	25% 50%	50% 75%	60% 90%	75% 90%	85% 100%	90% 100%	100% 100%	90% 100%	50% 100%	45% 75%	45% 75%	75% 95%	80% 95%	80% 95%	80% 95%	60% 80%	55% 65%	50% 65%	25% 35%	

1) For the hour starting at time indicated.

2) Peak December = peak customer period for retail uses.

3) Late December = December 25-31.

Table 2-51: Time of Day Factors – Weekend

Land Use	6:00 a.m. ¹⁾	7:00 a.m.	8:00 a.m.	9:00 a.m.	10:00 a.m.	11:00 a.m.	12:00 p.m.	1:00 p.m.	2:00 p.m.	3:00 p.m.	4:00 p.m.	5:00 p.m.	6:00 p.m.	7:00 p.m.	8:00 p.m.	9:00 p.m.	10:00 p.m.	11:00 p.m.	12:00 a.m.
Casino: Patron	14%	13%	11%	18%	30%	46%	74%	81%	100%	83%	78%	82%	89%	89%	85%	86%	91%	88%	85%
Employee	30%	30%	30%	30%	35%	42%	29%	73%	78%	85%	85%	85%	78%	74%	75%	76%	76%	74%	70%
Hotel: Patron	95%	95%	90%	80%	70%	70%	65%	65%	70%	70%	75%	80%	85%	85%	90%	95%	95%	100%	100%
Employee	5%	30%	90%	90%	100%	100%	100%	100%	100%	100%	90%	75%	60%	55%	55%	55%	45%	45%	30%
Conference Space: Patron	0%	0%	50%	100%	100%	100%	100%	100%	100%	100%	100%	100%	50%	30%	30%	10%	0%	0%	0%
Employee	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Spa/Gym: Patron	80%	45%	35%	50%	35%	50%	50%	30%	25%	30%	55%	100%	95%	60%	30%	10%	1%	1%	0%
Employee	50%	50%	50%	50%	50%	50%	50%	50%	50%	50%	75%	100%	100%	75%	50%	20%	20%	20%	0%
Retail: Patron	1%	5%	10%	30%	50%	65%	80%	90%	100%	100%	95%	90%	80%	75%	65%	50%	35%	15%	0%
Employee	10%	15%	40%	75%	85%	95%	100%	100%	100%	100%	100%	95%	85%	80%	75%	65%	45%	15%	0%
Peak December ²⁾ Patron	1%	5%	10%	35%	60%	70%	85%	95%	100%	100%	95%	90%	80%	75%	65%	50%	35%	15%	0%
Employee	10%	15%	40%	75%	85%	95%	100%	100%	100%	100%	100%	95%	85%	80%	75%	65%	45%	15%	0%
Late December ³⁾ Patron	1%	5%	10%	20%	40%	60%	80%	95%	100%	100%	95%	85%	70%	60%	50%	30%	20%	10%	0%
Employee	10%	15%	40%	75%	85%	95%	100%	100%	100%	100%	100%	95%	85%	80%	75%	65%	45%	15%	0%
Fine Dining: Patron	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	60%	90%	95%	100%	90%	90%	90%	50%
Employee	0%	0%	0%	0%	0%	0%	0%	0%	0%	15%	75%	90%	100%	100%	100%	100%	100%	85%	50%
Fast-food Restaurant: Patron	5%	10%	20%	30%	55%	85%	100%	100%	90%	60%	55%	60%	85%	80%	50%	30%	20%	10%	5%
Employee	15%	20%	30%	40%	75%	100%	100%	100%	95%	70%	60%	70%	90%	90%	60%	40%	30%	20%	20%
Family Restaurant: Patron	10%	25%	45%	70%	90%	90%	100%	85%	65%	40%	45%	60%	70%	70%	65%	30%	25%	15%	10%
Employee	50%	75%	90%	90%	100%	100%	100%	100%	100%	75%	75%	95%	95%	95%	95%	80%	65%	65%	35%

1) For the hour starting at time indicated.

2) Peak December = peak customer period for retail uses.

3) Late December = December 25-31.

Table 2-52: Non-Captive Parking Adjustment Factor

Land Use	Non-captive Parking Adjustment Factors (Percent)	
	Patron	Employee
Casino	100%	100%
Hotel	100%	100%
Conference Space	80%	100%
Spa/Gym	60%	100%
Retail	95%	100%
Fine Dining	95%	100%
Fast-food Restaurant	50%	100%
Family Restaurant	80%	100%

Using this methodology, and these parking ratios and adjustment factors, a shared parking analysis was completed for the Project in order to identify the peak parking demand period and requisite number of parking spaces necessary to accommodate the identified demand.

2.3.4 RESULTS OF ANALYSIS

Pursuant to the ULI shared parking analysis methodology, the parking demands for the individual components of the Project were modeled over a continuous 19-hour period (6:00 a.m. to 12:00 a.m.) for both weekdays and weekends over 12 months, “peak December” (defined as the peak customer period for retail uses) and “late December” (defined as the period from December 25-31) periods. Table 2-53 summarizes the identified peak parking demand for the Project (all uses) for each month of the year and for the “peak December” and “late December” periods, with the detailed shared parking analysis worksheets included in Appendix B.

Table 2-53: Peak Parking Demand

Analysis Period	Peak Parking Demand (Spaces)	
	Patron Weekend, 7:00 p.m.	Employee ¹ Weekend, 7:00 p.m.
January	2,259	357
February	2,317	357
March	2,352	361
April	2,313	361
May	2,296	361
June	2,287	361
July	2,331	361
August	2,360	361
September	2,233	361
October	2,259	361
November	2,261	363
December	2,195	365
Peak December	2,195	365
Late December	2,335	363

¹The employee parking demand will be met at designated off-site parking locations.

As shown in Table 2-53, the peak parking demand for patrons of the Project is expected to occur at 7:00 p.m. on a weekend in August, with a projected patron parking demand of 2,360 spaces. The peak parking demand for employees of the Project is expected to occur at 7:00 p.m. on a weekend in December, with a projected employee parking demand of 365 spaces.

As stated previously, after accounting for the operational capacity (85%) and the designated accessible, alternative fuel, car/vanpool/car-share and EV charging spaces, the peak patron parking demand of 2,360 will occupy about 91% of the available general use garage spaces. This analysis indicates that the available supply can accommodate the projected demand with allowance for special event conditions and inherent parking inefficiencies, with reserve capacity to ensure that the parking demands and potential demand variations can be accommodated within the Project Site without impacting on-site circulation, or the movement of vehicles, pedestrians and bicyclists along Lower Broadway/Alford Street (Route 99), and proximate roadways, driveways, and intersections. As noted previously, while the

Project will provide an on-site parking supply of approximately 0.74 spaces per gaming position, which is less than the average parking supply that is provided for similar resort facilities (1.01 spaces per gaming position), the parking supply represents a reasonable parking supply that is sufficiently constrained to encourage the use of public transportation and other alternatives to SOVs.

The Proponent's planned leasing of space for off-site employee parking for up to 800 vehicles will be sufficient to accommodate the projected employee parking demand of 365 spaces. Tables 2-54 and 2-55 summarize the patron parking demand by time of day and month for weekdays and weekends. Tables 2-56 and 2-57 summarize the employee parking demand by time of day and month for weekdays and weekends.

Table 2-54: Shared Parking Demand by Time of Day and Month – Patron Parking Demand – Weekday

Month	6:00 a.m. ¹⁾	7:00 a.m.	8:00 a.m.	9:00 a.m.	10:00 a.m.	11:00 a.m.	12:00 p.m.	1:00 p.m.	2:00 p.m.	3:00 p.m.	4:00 p.m.	5:00 p.m.	6:00 p.m.	7:00 p.m.	8:00 p.m.	9:00 p.m.	10:00 p.m.	11:00 p.m.	12:00 a.m.	Maximum
January	627	574	697	943	1,072	1,266	1,596	1,766	1,713	1,644	1,621	1,688	1,784	2,112	2,126	2,087	2,094	2,035	1,859	2,126
February	664	609	777	1,065	1,191	1,385	1,714	1,884	1,832	1,763	1,741	1,811	1,863	2,180	2,197	2,137	2,134	2,077	1,901	2,197
March	666	616	768	1,040	1,170	1,367	1,700	1,868	1,808	1,737	1,715	1,799	1,874	2,202	2,218	2,160	2,160	2,102	1,914	2,218
April	659	611	697	901	1,030	1,225	1,558	1,726	1,669	1,599	1,576	1,654	1,793	2,140	2,157	2,131	2,149	2,093	1,909	2,157
May	622	580	678	896	1,031	1,227	1,563	1,730	1,668	1,597	1,573	1,655	1,785	2,128	2,142	2,107	2,122	2,063	1,875	2,142
June	621	579	658	858	992	1,189	1,525	1,692	1,631	1,560	1,535	1,616	1,764	2,113	2,127	2,100	2,120	2,061	1,873	2,127
July	661	616	684	871	1,002	1,198	1,533	1,700	1,638	1,567	1,544	1,631	1,792	2,148	2,165	2,144	2,166	2,109	1,918	2,166
August	663	618	743	988	1,120	1,318	1,653	1,820	1,757	1,685	1,662	1,752	1,857	2,197	2,213	2,163	2,171	2,112	1,919	2,213
September	566	526	663	924	1,062	1,258	1,595	1,763	1,702	1,632	1,606	1,678	1,765	2,088	2,099	2,047	2,053	1,990	1,807	2,099
October	571	532	680	952	1,092	1,289	1,627	1,795	1,730	1,659	1,632	1,713	1,794	2,116	2,127	2,066	2,068	2,004	1,814	2,127
November	569	530	705	1,006	1,147	1,344	1,682	1,850	1,788	1,717	1,690	1,767	1,818	2,130	2,140	2,067	2,061	1,996	1,810	2,140
December	479	453	562	805	964	1,168	1,514	1,683	1,609	1,536	1,505	1,589	1,715	2,048	2,048	1,991	1,995	1,918	1,719	2,048
Peak December	479	453	562	805	964	1,168	1,514	1,683	1,609	1,536	1,505	1,589	1,715	2,048	2,048	1,991	1,995	1,918	1,719	2,048
Late December	669	618	712	925	1,052	1,256	1,600	1,773	1,716	1,648	1,623	1,697	1,818	2,151	2,164	2,138	2,154	2,100	1,914	2,164

1) For the hour starting at time indicated.

Table 2-55: Shared Parking Demand by Time of Day and Month – Patron Parking Demand – Weekend

Month	6:00 a.m. ¹⁾	7:00 a.m.	8:00 a.m.	9:00 a.m.	10:00 a.m.	11:00 a.m.	12:00 p.m.	1:00 p.m.	2:00 p.m.	3:00 p.m.	4:00 p.m.	5:00 p.m.	6:00 p.m.	7:00 p.m.	8:00 p.m.	9:00 p.m.	10:00 p.m.	11:00 p.m.	12:00 a.m.	Maximum
January	666	603	674	882	1,066	1,320	1,745	1,809	2,059	1,748	1,720	1,921	2,034	2,259	2,193	2,070	2,103	2,040	1,889	2,259
February	708	641	734	962	1,143	1,397	1,820	1,885	2,136	1,824	1,798	2,001	2,094	2,317	2,253	2,121	2,149	2,087	1,935	2,317
March	708	646	735	961	1,149	1,404	1,831	1,893	2,141	1,822	1,796	2,010	2,120	2,352	2,287	2,147	2,174	2,108	1,947	2,352
April	702	642	697	887	1,074	1,328	1,754	1,818	2,067	1,751	1,723	1,931	2,071	2,313	2,250	2,130	2,166	2,101	1,943	2,313
May	660	606	671	872	1,066	1,321	1,750	1,814	2,059	1,740	1,710	1,921	2,057	2,296	2,231	2,101	2,135	2,066	1,903	2,296
June	659	606	660	852	1,045	1,300	1,730	1,793	2,039	1,721	1,691	1,900	2,045	2,287	2,221	2,097	2,133	2,064	1,902	2,287
July	703	645	695	879	1,070	1,324	1,752	1,814	2,060	1,740	1,712	1,928	2,082	2,331	2,268	2,145	2,182	2,115	1,951	2,331
August	705	647	725	939	1,131	1,387	1,816	1,878	2,124	1,803	1,775	1,993	2,120	2,360	2,295	2,157	2,187	2,118	1,952	2,360
September	599	548	631	854	1,050	1,305	1,736	1,800	2,044	1,729	1,697	1,900	2,010	2,233	2,163	2,027	2,058	1,987	1,830	2,233
October	602	553	643	874	1,073	1,329	1,762	1,824	2,066	1,747	1,716	1,926	2,036	2,259	2,189	2,043	2,072	1,999	1,836	2,259
November	601	551	654	899	1,097	1,354	1,786	1,850	2,094	1,777	1,745	1,951	2,044	2,261	2,190	2,042	2,066	1,993	1,833	2,261
December	499	464	539	767	985	1,246	1,690	1,753	1,991	1,670	1,633	1,843	1,971	2,195	2,114	1,962	1,989	1,902	1,730	2,195
Peak December	499	464	539	767	985	1,246	1,690	1,753	1,991	1,670	1,633	1,843	1,971	2,195	2,114	1,962	1,989	1,902	1,730	2,195
Late December	711	648	710	903	1,094	1,356	1,789	1,856	2,101	1,783	1,757	1,968	2,100	2,335	2,267	2,132	2,167	2,106	1,947	2,335

1) For the hour starting at time indicated.

Table 2-56: Shared Parking Demand by Time of Day and Month – Employee Parking Demand – Weekday

Month	6:00 a.m. ¹⁾	7:00 a.m.	8:00 a.m.	9:00 a.m.	10:00 a.m.	11:00 a.m.	12:00 p.m.	1:00 p.m.	2:00 p.m.	3:00 p.m.	4:00 p.m.	5:00 p.m.	6:00 p.m.	7:00 p.m.	8:00 p.m.	9:00 p.m.	10:00 p.m.	11:00 p.m.	12:00 a.m.	Maximum
January	118	106	157	162	185	202	217	269	284	294	292	289	253	323	323	315	303	279	241	323
February	118	106	157	162	185	202	217	269	284	294	292	289	253	323	323	315	303	279	241	323
March	118	107	158	163	187	204	218	271	285	296	294	291	255	326	326	318	306	281	243	326
April	118	107	158	163	186	203	218	270	285	296	293	290	254	326	326	318	306	281	243	326
May	118	107	158	163	186	203	218	270	285	295	293	290	254	326	325	318	306	281	243	326
June	118	107	158	163	186	203	218	270	285	295	293	290	254	326	325	318	306	281	243	326
July	118	107	158	163	186	203	218	270	285	295	293	290	254	326	325	318	306	281	243	326
August	118	107	158	163	186	203	218	270	285	296	293	290	254	326	326	318	306	281	243	326
September	118	107	158	163	186	203	218	270	285	296	294	291	255	326	326	318	306	281	243	326
October	118	107	158	163	187	204	218	271	285	296	294	291	255	326	326	318	306	281	243	326
November	119	107	159	164	188	205	220	272	283	288	280	274	237	301	300	292	279	258	229	301
December	119	108	160	166	189	207	222	274	284	289	282	276	238	303	302	293	280	258	229	303
Peak December	119	108	160	166	189	207	222	274	284	289	282	276	238	303	302	293	280	258	229	303
Late December	119	107	159	165	188	205	220	272	283	288	281	275	237	301	300	292	279	258	229	301

1) For the hour starting at time indicated.

Table 2-57: Shared Parking Demand by Time of Day and Month – Employee Parking Demand – Weekend

Month	6:00 a.m. ¹⁾	7:00 a.m.	8:00 a.m.	9:00 a.m.	10:00 a.m.	11:00 a.m.	12:00 p.m.	1:00 p.m.	2:00 p.m.	3:00 p.m.	4:00 p.m.	5:00 p.m.	6:00 p.m.	7:00 p.m.	8:00 p.m.	9:00 p.m.	10:00 p.m.	11:00 p.m.	12:00 a.m.	Maximum
January	123	108	146	151	174	190	206	257	268	274	281	285	266	357	357	348	329	312	264	357
February	123	108	146	151	174	190	206	257	268	274	281	285	266	357	357	348	329	312	264	357
March	124	110	147	153	176	192	208	259	270	276	284	288	269	361	361	352	333	315	265	361
April	124	110	147	153	175	192	208	259	270	275	283	288	269	361	361	352	333	315	265	361
May	124	110	147	153	175	192	207	259	270	275	283	288	269	361	361	352	333	315	265	361
June	124	110	147	153	175	192	207	259	270	275	283	288	269	361	361	352	333	315	265	361
July	124	110	147	153	175	192	207	259	270	275	283	288	269	361	361	352	333	315	265	361
August	124	110	147	153	175	192	208	259	270	275	283	288	269	361	361	352	333	315	265	361
September	124	110	147	153	175	192	208	259	270	276	283	288	269	361	361	352	333	315	265	361
October	124	110	147	153	176	192	208	259	270	276	284	288	269	361	361	352	333	315	265	361
November	125	110	148	154	177	194	209	261	272	277	285	290	271	363	363	353	334	315	265	363
December	125	110	149	155	179	195	211	263	273	279	287	291	272	365	365	355	335	316	265	365
Peak December	125	110	149	155	179	195	211	263	273	279	287	291	272	365	365	355	335	316	265	365
Late December	125	110	148	154	177	194	209	261	272	277	285	290	271	363	363	353	334	315	265	363

1) For the hour starting at time indicated.

2.4 PUBLIC/PRIVATE TRANSIT EVALUATIONS AND OUTCOMES SINCE FEIR

The Project Site is ideally located to take advantage of public transportation resources in the area, including MBTA Orange Line service at Wellington and Malden Center stations, and MBTA bus service along Broadway (Route 104, Route 105, and Route 109). It is expected that employees will utilize MBTA buses connecting to Wellington Station, particularly on Route 90, Route 100, and Route 134. The Proponent will provide patron and employee shuttle service between the Project Site and the Wellington and Malden Center Orange Line stations. In addition, the Project will include new docking facilities for water taxis and a water shuttle that will service specified locations in the Boston downtown/waterfront area.

As is discussed in Section 2.1.2, as a result of these existing and proposed services, along with the Project's planned pedestrian and bicycle connections, and the implementation of a comprehensive TDM program as further described below, a significant percentage of patrons and employees are expected to use public transportation and Project-provided private transportation to travel to and from the Project.

This section updates the evaluation of the Project's impacts on MBTA transit services (Orange Line and local bus routes) and provides more detail regarding the Project's proposed shuttle services.

2.4.1 MBTA BUSES

2.4.1.1 RIDERSHIP AND CAPACITY

During the Proponent's post-FEIR consultation with MassDOT and the MBTA, MassDOT and the MBTA requested the data on bus ridership underlying the Proponent's FEIR assessment of the six MBTA bus routes that might experience additional passenger loads relating to the Project based on their proximity to the Project Site and the destinations of the bus routes. The bus routes identified were #90, #100, #104, #105, #109, and #134. Approximately 10% of Project employees are expected to use MBTA local bus transit to access the Project. The analysis estimated the percentage of Project employees that might use each of these bus routes based on the total estimated bus use by Project employees and the proximity of the bus routes to the Project Site and other destinations.

This section provides the information already shared with, and reviewed by, MassDOT and the MBTA. The related calculations can be found in Appendix B. Table 2-58 shows the estimated distribution of Project employee bus use.

Table 2-58: Estimated Project Employee Distribution by Bus Route

Route Number	Origin-Destination	Percentage of Employee Trips Assigned
90	Davis – Wellington	5%
100	Elm Street – Wellington	10%
104	Malden – Sullivan via Ferry	30%
105	Malden – Sullivan via Main	10%
109	Linden – Sullivan	30%
134	North Woburn – Wellington	15%

The estimated distribution of Project employees to specific buses over the course of the day was based on bus counts taken in Fall 2012. If multiple buses on a particular route are offered in a particular hour, employees were assumed to board these buses evenly over the course of that hour. If no buses are offered during a particular hour, employees were assumed to board the buses in the hours before and after that hour. If bus service on a particular route ends earlier than 12:00 a.m., employees were assumed to board a different bus along a similar route. In the case of the #105 bus, employees assigned to the #105 bus were instead assigned the #104 bus after #105 service ends at 7:10 p.m. This results in heavier loads on the #104 bus as service frequency declines in the evening.

Table 2-59 and Table 2-60 (Tables 4-45 and 4-46 from the FEIR) show each of the assessed bus routes for a weekday and a Saturday. Each table shows the estimated number of bus trips under and over capacity in both the Existing and Build Conditions.

As shown in Table 2-61 and Table 2-62, the #109 bus has one inbound bus (5:00 a.m.) and one outbound bus (4:15 p.m.) that currently operate over capacity on weekdays and one outbound bus (8:25 p.m.) that operates over capacity on Saturday in the Existing Conditions. All other bus routes operate below capacity throughout weekdays and Saturday.

In the Build Conditions, added Project trips cause just one additional bus to exceed capacity: an outbound #104 Saturday bus leaving Sullivan Square at 11:20 p.m., which is projected to exceed capacity by about four passengers. Before adding Project trips, this bus had a passenger load of about 50 passengers, just three fewer than capacity. The subsequent outbound #104 bus, which leaves Sullivan Square at 12:15 a.m., will be at the capacity of 53 passengers as a result of the five Project trips anticipated to utilize that #104 bus.

Table 2-59: MBTA Bus Routes – Bus Trip Capacity Load, Weekday

MBTA Route/Direction	Number of Bus Trips			
	Existing Conditions		Build Conditions	
	Under capacity	Over Capacity	Under capacity	Over Capacity
Route 90 <i>Davis Sq. – Wellington via Highland Ave.</i>				
Inbound (toward Sullivan Sq.)	19	0	19	0
Outbound (toward Linden Sq.)	<u>19</u>	<u>0</u>	<u>19</u>	<u>0</u>
Total	38	0	38	0
Route 100 <i>Elm Street (Medford) – Wellington via Fellsway</i>				
Inbound (toward Sullivan Sq.)	38	0	38	0
Outbound (toward Linden Sq.)	<u>38</u>	<u>0</u>	<u>38</u>	<u>0</u>
Total	76	0	76	0
Route 104 <i>Malden Ctr. – Sullivan Sq. via Ferry St. & Broadway</i>				
Inbound (toward Sullivan Sq.)	48	0	48	0
Outbound (toward Malden Center)	<u>45</u>	<u>0</u>	<u>45</u>	<u>0</u>
Total	93	0	93	0
Route 105 <i>Malden Ctr. – Sullivan Sq. via Newland St. Housing</i>				
Inbound (toward Sullivan Sq.)	18	0	18	0
Outbound (toward Malden Center)	<u>18</u>	<u>0</u>	<u>18</u>	<u>0</u>
Total	36	0	36	0
Route 109 <i>Linden Sq. – Sullivan Sq. via Glendale Sq.</i>				
Inbound (toward Sullivan Sq.)	53	1	53	1
Outbound (toward Linden Sq.)	<u>55</u>	<u>1</u>	<u>55</u>	<u>1</u>
Total	108	2	108	2
Route 134 <i>North Woburn – Wellington via Winchester Sq.</i>				
Inbound (toward Wellington)	42	0	42	0
Outbound (North Woburn)	<u>40</u>	<u>0</u>	<u>40</u>	<u>0</u>
Total	82	0	82	0

Table 2-60: MBTA Bus Routes – Bus Trip Capacity Load, Saturday

MBTA Route/Direction	Number of Bus Trips			
	Existing Conditions		Build Conditions	
	Under Capacity	Over Capacity	Under Capacity	Over Capacity
Route 90 <i>Davis Sq. – Wellington via Highland Ave.</i>				
Inbound (toward Sullivan Sq.)	13	0	13	0
Outbound (toward Linden Sq.)	<u>13</u>	<u>0</u>	<u>13</u>	<u>0</u>
Total	38	0	38	0
Route 100 <i>Elm Street (Medford) – Wellington via Fellsway</i>				
Inbound (toward Sullivan Sq.)	35	0	35	0
Outbound (toward Linden Sq.)	<u>34</u>	<u>0</u>	<u>34</u>	<u>0</u>
Total	69	0	69	0
Route 104 <i>Malden Center – Sullivan Sq. via Ferry St. & Broadway</i>				
Inbound (toward Sullivan Sq.)	33	0	33	0
Outbound (toward Malden Center)	<u>33</u>	<u>0</u>	<u>32</u>	<u>1</u>
Total	66	0	65	1
Route 105 <i>Malden Ctr. – Sullivan Sq. via Newland St. Housing</i>				
Inbound (toward Sullivan Sq.)	13	0	13	0
Outbound (toward Malden Center)	<u>13</u>	<u>0</u>	<u>13</u>	<u>0</u>
Total	26	0	26	0
Route 109 <i>Linden Sq. – Sullivan Sq. via Glendale Sq.</i>				
Inbound (toward Sullivan Sq.)	29	0	29	0
Outbound (toward Linden Sq.)	<u>28</u>	<u>1</u>	<u>28</u>	<u>1</u>
Total	57	1	57	1
Route 134 <i>North Woburn – Wellington via Winchester Sq.</i>				
Inbound (toward Wellington)	32	0	32	0
Outbound (North Woburn)	<u>33</u>	<u>0</u>	<u>33</u>	<u>0</u>
Total	65	0	65	0

The Proponent's assessment indicates that the MBTA bus routes serving the Project on Broadway generally have adequate capacity to serve Project employees anticipated to use these bus routes. Two weekday

trips and one Saturday trip on bus route #109 currently operate over capacity and will continue to do so when serving Project employees. The Project results in an estimated excess demand of one passenger on one late night (11:20 p.m.) Saturday trip on one route (#104).

However, this assessment does not account for the Project's employee shuttle service, which will run 24 hours a day, and will be more frequent (minimum 30-minute headways) than the early morning and late-night MBTA bus service (one-hour headways), and would pick passengers up and drop them off in more convenient locations than an MBTA bus would. The Proponent will schedule and manage all employee shuttles (to MBTA stations, to off-site employee parking lots, and to neighborhood locations) in connection with employee shift changes in a manner that maximizes the utility and convenience of the shuttles. Therefore, the number of employees estimated in this assessment to use the #104 and #109 buses at these hours is likely overstated and could actually be zero. In any event, together with the Project's employee shuttle, these buses should easily accommodate employee demand.

2.4.1.2 POTENTIAL IMPACTS TO BUS ROUTE HEADWAYS

During the Proponent's post-FEIR consultation with MassDOT and the MBTA, MassDOT, and the MBTA also requested that the Proponent analyze the potential impacts of Project-related traffic on MBTA bus travel times on scheduled routes, and on pull-out and deadhead trips that could be affected by Project traffic. The Proponent's analysis, already shared with and reviewed by MassDOT and the MBTA, shows that the projected **decreases** in bus travel times on outbound MBTA routes and pull-out and deadhead trips (as much as six minutes) associated with the Project and its off-site transportation mitigation are far greater and more numerous than increases in bus travel times, and that no increase is greater than approximately one minute.

Scheduled Bus Routes

In order to determine the potential impacts that Project traffic might have on existing MBTA bus schedules, a travel time impact analysis was performed for all bus routes that utilize Wellington Station and Sullivan Square Station, totaling 21 bus routes. Travel time impacts were determined for the No Build Condition, Build Condition, and Build with Mitigation Condition. Build and Build with Mitigation Conditions were compared to the No Build Condition to determine if an increase or decrease in overall travel time for such route was associated with the

Project. Increases in travel time could result from delays associated with Project passengers boarding or alighting a bus or increases in delays at study area intersections. Decreases in travel time could result from the Project's off-site transportation mitigation measures.

Table 2-61 shows how the travel times of MBTA buses that utilize Broadway (Route 99) could be affected by bus passengers and vehicular traffic associated with the Project as well as the Project's proposed off-site transportation mitigation. In the inbound direction (toward Sullivan Square Station), the three buses utilizing Broadway (Route 99) are projected to experience an increase of travel time of between 97–107 seconds on Fridays (constituting a percentage increase of approximately 6–9%). For example, the #104 inbound bus, which is projected to have a travel time of just over 20 minutes in the No Build Condition, is expected to have a travel time of about 22 minutes in the Build with Mitigation Condition. Similar increases in travel time are projected for the #105 and #109 buses for both Fridays and Saturdays.

However, in the outbound direction, buses are expected to experience a reduction in travel time of as much as eight minutes (or a percentage reduction of approximately 25% (24% in the Friday p.m. "real" peak condition) due to the Project's proposed mitigation on Broadway (Route 99), most notably the addition of exclusive left-turn lanes at Beacham Street and Bowdoin Street. The #104 outbound route, which is projected to take 35 minutes in the No Build Condition, would experience a 25% reduction in travel time, only needing 27 minutes in the Build with Mitigation Condition. On Saturdays, outbound trips also experience a reduction in travel time compared to the No-Build condition.

Table 2-61: Estimated Schedule Bus Route Travel Time Impacts

Route	Time Period/ Condition	No-Build Added Delay (sec)		Build Added Delay (sec)		Build with Mitigation Added Delay (sec)		% Change in Travel Time (vs. No-Build)	
		IB	OB	IB	OB	IB	OB	IB	OB
104	Friday	12.4	440.8	91.7	234.3	98.9	-517.9	8.2%	-24.4%
	Friday Real Peak	12.4	440.8	57.7	135.4	73.6	-500.0	6.1%	-23.6%
	Saturday	67.2	65.7	178.3	272.4	23.6	-83.2	1.7%	-4.9%
105	Friday	12.4	440.8	81.4	224.0	88.6	-528.2	5.1%	-24.9%
	Friday Real Peak	12.4	440.8	47.4	125.1	63.3	-510.3	3.6%	-24.1%
	Saturday	67.2	65.7	173.2	262.1	18.5	-93.5	1.2%	-5.5%
109	Friday	12.4	440.8	91.7	234.3	98.9	-517.9	7.4%	-24.4%
	Friday Real Peak	12.4	440.8	58.4	127.6	73.6	-500.0	5.5%	-23.6%
	Saturday	67.2	65.7	178.3	272.4	23.6	-83.2	1.7%	-5.1%

Information for every other bus route that utilizes the Sullivan Square or Wellington stations can be found in Appendix B.

All travel time calculations used Synchro-calculated delay data from the revised analysis are provided in Appendix B.

Pull-out/Deadhead Trips

Travel time analysis was also performed for all bus pull-out and deadhead trips that originate from or are destined to the MBTA Charlestown and Somerville garages located at 21 Arlington Avenue in Boston. Buses were assumed to utilize routes that minimized travel distance and travel time as indicated in Appendix B. Because pull-out and deadhead trips do not have passengers, the only potential Project impacts on the travel times associated with these trips would relate to increases or decreases in delays at Study Area intersections. Pull-out and deadhead travel time analysis was performed for those routes that are assumed to travel through Study Area intersections only.

On Fridays, of the 36 pull-out and deadhead trips, 18 are projected to have a decrease or no change in travel time, with six of those routes projected to experience a decrease in travel time of at least nine minutes as a result of the Project's transportation mitigation at Study Area intersections. Of the 18 routes that are projected to experience increases in travel times, no increase in travel time is greater than 49 seconds

compared to the No Build Condition. Similarly, on Saturdays, 13 routes are projected to experience decreases in travel times, and no route is projected to experience an increase in travel time of more than 36 seconds.

2.4.2 MBTA ORANGE LINE

As is discussed in Section 2.1.2, public transit access to the Project via the MBTA's Orange Line is a key component of the Project's transportation strategy to maximize patron and employee use of non-automobile travel modes. A significant proportion of Project patrons and employees are expected to travel on the Orange Line to connect with frequent and convenient shuttle bus services provided by the Proponent from the MBTA's Wellington and Malden Center Stations. Project employees are also expected to utilize one of several MBTA bus routes servicing Lower Broadway (Route 99) from Sullivan Square Station.

In order to confirm the capacity of the Orange Line to provide service to Project patrons and employees, the Proponent has prepared, in consultation with MassDOT, a further detailed analysis of potential Project-related ridership on the Orange Line that is included in this Section 2.5.2. This analysis demonstrates that the Orange Line will satisfactorily serve Project patrons and employees, and that the additional ridership will not adversely affect future Orange Line operations.

The analysis compares existing Orange Line operations, future (2023) operations including expected general ridership growth, and future (2023) operations with anticipated Project-related ridership added to general growth. The analysis applies the MBTA's Service Delivery Policy, which quantifies the vehicle loading that the MBTA seeks to achieve by time of day and by location in "core" (downtown heavily traveled areas) or "non-core" (outside downtown) portions of a transit line. The analysis shows that the Orange Line capacity will be sufficient to accommodate anticipated 2023 ridership in compliance with the MBTA's Service Delivery Policy in most but not all hours and parts of the line, with modest non-compliance with the MBTA's Service Delivery Policy during three particular weekday non-peak hours (9-10 a.m., 7-8 p.m., and 8-9 p.m.), two of which (9-10 a.m. and 7-8 p.m.) currently experience the same non-compliance. It is important to note that the analysis shows that the Orange Line has the actual capacity to serve its riders both now and as anticipated in 2023. However, in these hours, the Service Delivery Policy allows for only 81 passengers per Orange Line car in the core area (Back Bay to North Station), and for only 58 passengers per car (i.e., no standing passengers) in the non-core area that includes the stations serving the Project Site.

Orange Line future ridership projected without the Project would exceed these desired standard loadings by approximately 2 to 32 passengers per Orange Line car

in the non-core area. With the addition of Project patrons and employees as future riders (the Project would add about 2 to 5 passengers per car), Orange Line ridership in the non-core area would continue not to comply with the Service Delivery Policy in the same three weekday non-peak hours in which the Orange Line service is currently not in compliance with the Service Delivery Policy. This would mean that some passengers would be standing for some amount of their trip but not that any train would not be overcrowded or difficult to board. In the Build Condition (with the Project), ridership would also be in non-compliance with the Service Delivery Policy during one Saturday hour (12-1 p.m.), but by less than one additional passenger per train.

In summary, in nearly all time periods and locations, the Orange Line is projected to operate in the future within the Service Delivery Policy capacity standards with or without the Project. The Orange Line will continue not to comply with the Service Delivery Policy during certain hours in the No Build and Build Conditions and is projected not to comply with the Service Delivery Policy in one additional Saturday hour in the Build future condition. However, the analysis demonstrates that Project ridership will have no adverse effect on overall Orange Line operations, and accordingly no mitigation is warranted.

This analysis conservatively assumes that no improvements to Orange Line service and operations will occur prior to 2023. In fact, between now and 2023, the Orange Line will receive 152 new cars (a net addition of 32 cars or approximately 5 new train sets), which could allow the MBTA to more fully meet its Service Delivery Policy.

2.4.2.1 DATA SOURCES AND EXISTING ORANGE LINE SERVICE CHARACTERISTICS

Existing MBTA ridership data, collected by the Boston Region Metropolitan Planning Organization's (MPO's) Central Transportation Planning Staff (CTPS), were used to conduct these Orange Line capacity analyses. The MPO collected CharlieCard data on Thursday, September 20, 2012; Saturday, September 22, 2012; and Sunday, September 23, 2012, providing counts of hourly boardings and alightings at each Orange Line station for each of those dates⁷. This data was provided in Appendix B of the Wynn Everett DEIR.

⁷ Because Orange Line riders do not go through turnstiles when transferring from the Red Line or the Green Line, precise boarding counts for the Orange Line are not generally available. Accurate alighting data is also not available. The MPO's September 2012 data, therefore, represent the most recent accurate ridership counts available for the Orange Line.

The Project will be proximate to Orange Line stops at Sullivan Square Station (approximately 1.2 miles from the site), Wellington Station (approximately 1.5 miles), and Malden Center Station (approximately 3.1 miles). In addition, the new Assembly Square Station (approximately 1.6 miles via local roads) opened for service in September 2014. The Proponent will institute shuttle bus service to transport patrons and employees between Wellington and Malden Center stations and the Project. Several existing MBTA bus routes provide a public transportation connection between the Sullivan Square Station and the Project Site.

The MBTA's Service Delivery Policy⁸ defines the key performance characteristics (Service Objectives) of quality transit services and provides quantifiable Service Standards for meeting Service Objectives in the areas of accessibility, reliability, safety, comfort, and cost effectiveness. With respect to the Service Objectives of Safety and Comfort, the Service Delivery Policy outlines maximum desirable vehicle occupancy thresholds, or loading standards, which vary depending on time of day, represented by a ratio of the number of patrons compared to the number of seats in a car.

As provided in the Service Delivery Policy, during the early a.m. period (6:00 a.m. – 7:00 a.m.), the a.m. peak period (7:00 a.m. – 9:00 a.m.), the midday school period (1:30 p.m. – 4:00 p.m.) and the p.m. peak period (4:00 p.m. – 6:00 p.m.), a passenger load equaling 225% of the number of seats in a car is considered an acceptable load; during these periods it is expected that some passengers will be standing but that the MBTA will provide sufficient service so that vehicles are not excessively crowded. MBTA Orange Line cars each have 58 seats; therefore, a passenger load of 131 passengers per car is considered an acceptable load during these peak periods. During remaining hours of the day, or off-peak periods, a passenger load equaling 140% of the number of seats (or 81 passengers per car in the case of Orange Line cars) is considered acceptable within the "core" areas of a transit line (for the Orange Line, between North Station and Back Bay Station), and a passenger load equaling 100% of the number of seats (or 58 passengers per car in the case of Orange Line cars) is considered acceptable outside of the core area (for the Orange Line north of the core, between North Station and Oak Grove). To determine whether a service has an acceptable level of

⁸Posted on MBTA website at [https://www.mbta.com/uploadedfiles/About the T/T Projects/T Projects List/2010ServiceDeliveryPolicy.pdf](https://www.mbta.com/uploadedfiles/About%20the%20T/T%20Projects/T%20Projects%20List/2010ServiceDeliveryPolicy.pdf) (June 2, 2010).

loading, the vehicle loads are averaged over specified periods of time. The Service Delivery Policy recognizes that due to scheduling constraints and peaking characteristics, some individual trips may exceed the load levels expressed in the standards.

The Service Delivery Policy also establishes minimum frequency of service (minimum headways, or number of minutes between scheduled trips on a route) standards sufficient to achieve the Service Objective of Accessibility. On heavily used services, the minimum frequency of service levels may not be sufficient to meet customer demand. The Service Delivery Policy states that when ridership levels as measured against the loading standards (the Vehicle Loading Standard described in the preceding paragraph) indicate that additional service is warranted, the MBTA will increase frequency of service to provide a sufficient number of vehicles to accommodate passenger demand.

For all the heavy rail transit lines, the Service Delivery Policy's minimum frequency of service standard is 10-minute headways in a.m. and p.m. (rush hour) peak periods and 15-minute headways in other weekday periods and all day on Saturdays and Sundays. Currently, the Orange Line is scheduled to operate on weekdays at 6-minute headways during peak rush hours, 8-minute headways during mid-day (approximately 9:00 a.m. to 3:30 p.m.) and 10-minute headways during evening and late-night periods. On Saturdays, the Orange Line is currently scheduled to operate at 8-minute headways during the p.m. peak period (approximately 6:30 p.m. to 8:00 p.m.) and at 10-minute headways during other periods⁹. Table 2-62 shows the hourly capacity of the Orange Line during the peak and off-peak hours within and outside the core area.

⁹ Source: <http://www.mbta.com/schedules> and [maps/subway/lines/?route=ORANGE](http://www.mbta.com/maps/subway/lines/?route=ORANGE) (accessed September 11, 2014); also [http://www.mbta.com/uploadedfiles/Documents/Schedules and Maps/Upcoming Schedules/Subway/rtRapid .pdf](http://www.mbta.com/uploadedfiles/Documents/Schedules%20and%20Maps/Upcoming%20Schedules/Subway/rtRapid.pdf) (accessed September 11, 2014).

Table 2-62: Orange Line Hourly Passenger Capacities Based on Headway and Area

Headway	Peak Hours – Core and Non-core (passengers/hour)	Off-Peak Hours – Core Area (passengers/hour)	Off-Peak Hours – Non-core Area (passengers/hour)
5 minutes	9,432	5,832	4,176
6 minutes	7,860	4,860	3,480
8 minutes	5,895	3,645	2,610
10 minutes	4,716	2,916	2,088

*Based on 58-seat cars per train

2.4.2.2 ANALYSIS RESULTS: PEAK CORE AND NON-CORE LOADPOINTS

Ridership and capacity were analyzed in the Existing (2012), No-Build (2023), and Build (2023) conditions. As requested by MassDOT following the filing of the FEIR, and previously shared with and reviewed by MassDOT and the MBTA, an analysis was performed at two locations: the peak core-area loadpoint between Downtown Crossing and State stations and the peak non-core loadpoint north of downtown Boston between North Station and Community College station. Core-area stations are defined as those stations between Back Bay and North Station (inclusive), while non-core stations are those located north of North Station or south of Back Bay station. As noted previously, core-area stations have an off-peak “policy capacity” of 140% of seats, while non-core stations have an off-peak policy capacity of 100% of seats.

Existing Conditions

To assess whether the MBTA Orange Line is over capacity at any time over the course of a typical weekday or Saturday in the Existing (2012) Condition, a full weekday and Saturday of MBTA ridership data was analyzed for the loadpoints between Downtown Crossing and State stations and between North Station and Community College. As shown in Figure 2-93 and Figure 2-94, the Orange Line does not exceed capacity between Downtown Crossing and State stations on average during any hour throughout a typical weekday or Saturday.

However, as shown in Figure 2-95, existing ridership (as measured in 2012) exceeds capacity based on Service Delivery Policy loading standards between North Station and Community College during the 9:00 a.m. to 10:00 a.m. (southbound) and 7:00 p.m. to 8:00 p.m. hour (northbound) on weekdays. Outside of the core area, the policy capacity is 100% of total seats (in contrast to 140% within the core area), and 2012 ridership occupying 142.5% and 110.0% of total seats during the

9:00-10:00 a.m. and the 7:00-8:00 p.m. hours, respectively, therefore exceeds the capacity standard (see Table 3). During these hours, current operations in the non-core area do not meet the loading standards of the Service Delivery Policy.

As shown in Figure 2-96, existing ridership does not exceed capacity at any time on a typical Saturday. Tables 2-63, 2-64, 2-65, and 2-66 show the existing ridership compared to policy capacity at each analyzed loadpoint.

Table 2-63: Existing (2012) Conditions Ridership and Capacity Summary, Core Area, Weekday

Time	Core Policy Capacity	Headway (min)	Ridership between Downtown Crossing - State			
			NB	NB % of Capacity	SB	SB % of Capacity
5-6 a.m.	2,916	10	463	15.9%	1,069	36.7%
6-7 a.m.	3,645	8	1,851	50.8%	3,075	84.4%
7-8 a.m.	7,860	6	3,452	43.9%	5,674	72.2%
8-9 a.m.	7,860	6	4,759	60.5%	6,884	87.6%
9-10 a.m.	3,645	8	1,927	52.9%	3,614	99.1%
10-11 a.m.	3,645	8	1,630	44.7%	2,397	65.8%
11 a.m. – 12 p.m.	3,645	8	1,686	46.3%	1,947	53.4%
12-1 p.m.	3,645	8	1,815	59.8%	2,065	56.7%
1-2 p.m.	4,770	8	2,048	42.9%	2,078	43.6%
2-3 p.m.	5,895	8	2,552	43.3%	2,563	43.5%
3-4 p.m.	6,737	7	3,710	55.1%	2,771	41.1%
4-5 p.m.	7,860	6	5,329	67.8%	3,728	47.4%
5-6 p.m.	7,860	6	6,393	81.3%	4,472	56.9%
6-7 p.m.	4,770	8	3,933	82.5%	2,124	44.5%
7-8 p.m.	2,916	10	2,437	83.6%	1,423	48.8%
8-9 p.m.	2,916	10	2,063	70.7%	1,233	42.3%
9-10 p.m.	2,916	10	1,503	51.5%	936	32.1%
10-11 p.m.	2,916	10	1,102	37.8%	1053	36.1%
11 p.m. – 12 a.m.	2,916	10	923	31.7%	458	15.7%
12-1 a.m.	2,916	10	257	8.8%	114	3.9%

Table 2-64: Existing (2012) Conditions Ridership and Capacity Summary, Non-core Area, Weekday

Time	Non-core Policy Capacity	Headway (min)	Ridership between North Station - Community College			
			NB	NB % of Capacity	SB	SB % of Capacity
5-6 a.m.	2,088	10	306	14.7%	959	45.9%
6-7 a.m.	4,253	8	1,083	25.5%	2,495	58.7%
7-8 a.m.	7,860	6	1,680	21.4%	5,230	66.5%
8-9 a.m.	7,860	6	1,773	22.6%	6,872	87.4%
9-10 a.m.	2,610	8	1,238	47.4%	3,720	142.5%
10-11 a.m.	2,610	8	1,022	39.2%	2,092	80.2%
11 a.m. – 12 p.m.	2,610	8	1,124	43.1%	1,801	69.0%
12-1 p.m.	2,610	8	1,283	49.2%	1,724	66.1%
1-2 p.m.	4,253	8	1,636	38.5%	1,647	38.7%
2-3 p.m.	5,895	8	2,069	35.1%	1,797	30.5%
3-4 p.m.	6,737	7	3,020	44.8%	1,901	28.2%
4-5 p.m.	7,860	6	4,762	60.6%	1,976	25.1%
5-6 p.m.	7,860	6	6,075	77.3%	2,297	29.2%
6-7 p.m.	4,253	8	3,727	87.6%	1,193	28.1%
7-8 p.m.	2,088	10	2,297	110.0%	797	38.2%
8-9 p.m.	2,088	10	1,936	92.7%	814	39.0%
9-10 p.m.	2,088	10	1,408	67.4%	542	26.0%
10-11 p.m.	2,088	10	1,254	60.1%	401	19.2%
11 p.m. – 12 a.m.	2,088	10	859	41.1%	183	8.8%
12-1 a.m.	2,088	10	261	12.5%	68	3.3%

Shading indicates Service Delivery Policy capacity is exceeded.

Table 2-65: Existing (2012) Conditions Ridership and Capacity Summary, Core Area, Saturday

Time	Core Policy Capacity	Headway (min)	Ridership between Downtown Crossing - State			
			NB	NB % of Capacity	SB	SB % of Capacity
5-6 a.m.	2,916	10	463	15.9%	387	13.3%
6-7 a.m.	2,916	10	362	12.4%	783	26.9%
7-8 a.m.	2,916	10	648	22.2%	1,198	40.9%
8-9 a.m.	2,916	10	1,071	36.7%	1,271	43.6%
9-10 a.m.	2,916	10	989	33.9%	1,526	52.3%
10-11 a.m.	2,916	10	1,228	42.1%	1,495	51.3%
11 a.m. – 12 p.m.	2,916	10	1,567	53.7%	1,614	55.3%
12-1 p.m.	2,916	10	1,619	55.5%	1,726	59.2%
1-2 p.m.	2,916	10	1,660	56.9%	1,621	55.6%
2-3 p.m.	2,916	10	1,747	59.9%	1,636	56.1%
3-4 p.m.	3,240	9	1,923	59.4%	1,819	56.1%
4-5 p.m.	3,645	8	2,029	55.7%	1,790	49.1%
5-6 p.m.	3,645	8	1,892	51.9%	1,925	52.8%
6-7 p.m.	3,240	9	1,565	48.3%	1,405	43.4%
7-8 p.m.	2,916	10	1,326	45.5%	1,187	40.7%
8-9 p.m.	2,916	10	1,306	44.8%	981	33.6%
9-10 p.m.	2,916	10	1,186	40.7%	900	30.9%
10-11 p.m.	2,916	10	1,390	47.7%	847	29.0%
11 p.m. – 12 a.m.	2,916	10	1,154	39.6%	667	22.9%
12-1 a.m.	2,916	10	532	18.2%	286	9.8%

Table 2-66: Existing (2012) Conditions Ridership and Capacity Summary, Non-core Area, Saturday

Time	Non-core Policy Capacity	Headway (min)	Ridership between North Station – Community College			
			NB	NB % of Capacity	SB	SB % of Capacity
5-6 a.m.	2,088	10	145	6.9%	253	12.1%
6-7 a.m.	2,088	10	245	11.7%	615	29.5%
7-8 a.m.	2,088	10	407	19.5%	900	43.1%
8-9 a.m.	2,088	10	873	41.8%	1,039	49.8%
9-10 a.m.	2,088	10	526	25.2%	1,563	74.9%
10-11 a.m.	2,088	10	657	31.5%	1,379	66.0%
11 a.m. – 12 p.m.	2,088	10	801	38.4%	1,729	82.8%
12-1 p.m.	2,088	10	865	41.4%	1,758	84.2%
1-2 p.m.	2,088	10	849	40.7%	1,466	70.2%
2-3 p.m.	2,088	10	1,063	50.9%	1,416	67.8%
3-4 p.m.	2,320	9	1,336	57.6%	1,415	61.0%
4-5 p.m.	2,610	8	1,545	59.2%	1,306	50.0%
5-6 p.m.	2,610	8	1,669	63.9%	1,088	41.7%
6-7 p.m.	2,320	9	1,451	62.5%	853	36.8%
7-8 p.m.	2,088	10	1,279	61.3%	785	37.6%
8-9 p.m.	2,088	10	1,122	53.7%	601	28.8%
9-10 p.m.	2,088	10	1,122	53.7%	480	23.0%
10-11 p.m.	2,088	10	1,209	57.9%	496	23.8%
11 p.m. – 12 a.m.	2,088	10	1,111	53.2%	316	15.1%
12-1 a.m.	2,088	10	539	25.8%	130	6.2%

2.4.2.3 NO BUILD CONDITIONS

In order to assess how general ambient growth in ridership impacts Orange Line service, a future No Build year of 2023 (which is the design year for transportation impact analysis for the Project generally) was set. An assumed ridership growth rate of 1% per year was determined using the Boston Region MPO's Long-range Transportation Plan, dated September 22, 2011¹⁰. This growth rate was applied to all 2012 existing ridership data to determine approximate ridership for 2023, assuming the Project is not constructed.

Between the present and 2023, the Orange Line will also be improved by the purchase of new cars, a procurement that was finalized as of October 22, 2014. This procurement will deliver 152 Orange Line cars, replacing the entire existing fleet of 120 cars with 152 new Orange Line vehicles (a net addition of 32 new cars comprising approximately 5 new train sets). Prior Orange Line signal improvements completed in 2008 were intended to allow for improved headways on the Orange Line once additional cars/trains became available. The new Orange Line fleet is expected to be in service before the 2023 design year used for this analysis. Since existing conditions on the Orange Line, for example in the section between North Station and Community College as discussed above, already do not meet Service Delivery Policy loading standards, and that capacity shortfall will only be exacerbated by further ridership growth projected to occur, it is expected that the MBTA will use this Orange Line fleet expansion to address the existing capacity issues by increasing service to some degree on both weekdays and weekends.

Accordingly, in the future No Build Condition, headway adjustments sufficient to address current and projected capacity issues are readily attainable and are assumed to have occurred once the new cars are introduced to the service. On weekdays, peak-period (6:30-9:00 a.m., 3:30-6:30 p.m.) headways are assumed to decrease from 6 minutes (10 trains per hour) to 5 minutes (12 trains per hour). It was assumed that all other periods would have the same headways as the present. It should be noted that signal improvements may have a significant impact in operations, reducing headways throughout the day even before accounting for any added train sets.

¹⁰ The Boston Region MPO, Table C-1, forecast a 29% growth rate in unlinked transit trips and a 27% increase in rapid transit line trips between a 2009 base year and 2035 (26 years). Based on this study, we estimated an approximate transit ridership growth rate of approximately 1% per year, and applied those increases to the 11-year time span from 2012 to 2023.

As shown in Figure 2-97 and Figure 2-98, the Orange Line exceeds capacity during the 9:00 a.m. to 10:00 a.m. period in the southbound direction in the No Build Condition. While ridership is significantly lower during this period than the 8:00 a.m. to 9:00 a.m. period, the peak period, as defined by the MBTA's Service Delivery Policy, ends at 9:00 a.m. As a result, the policy capacity is reduced from 225% of seats to 140% of seats. Ridership does not exceed capacity on Saturdays within the core area. Outside the core area, ridership exceeds policy capacity during the 9:00 a.m. to 10:00 a.m. period in the southbound direction and during the 7:00 p.m. to 8:00 p.m. and 8:00 p.m. to 9:00 p.m. periods in the northbound direction on weekdays, as shown in Figure 2-99 and Figure 2-100. During these off-peak periods, the MBTA's policy capacity is 100% of seats, as opposed to 140% of seats during off-peak periods in the core area and 225% of seats during peak periods. Projected No-Build ridership and capacity are shown in Tables 2-67, 2-68, 2-69, and 2-70.

Table 2-67: No Build (2023) Conditions Ridership and Capacity Summary, Core Area, Weekday

Time	Core Policy Capacity	Headway (min)	Ridership between Downtown Crossing - State			
			NB	NB % of Capacity	SB	SB % of Capacity
5-6 a.m.	2,916	10	517	17.7%	1,193	40.9%
6-7 a.m.	3,888	7.5	2,065	53.1%	3,431	88.2%
7-8 a.m.	9,432	5	3,851	40.8%	6,330	67.1%
8-9 a.m.	9,432	5	5,309	56.3%	7,680	81.4%
9-10 a.m.	3,645	8	2,150	59.0%	4,032	110.6%
10-11 a.m.	3,645	8	1,819	43.7%	2,674	64.2%
11 a.m. – 12 p.m.	3,645	8	1,881	45.2%	2,172	52.1%
12-1 p.m.	3,645	8	2,025	48.6%	2,304	55.3%
1-2 p.m.	4,770	8	2,285	41.9%	2,318	42.5%
2-3 p.m.	5,895	8	2,847	42.3%	2,859	42.4%
3-4 p.m.	7,255	6.5	4,139	52.7%	3,092	39.3%
4-5 p.m.	9,432	5	5,945	63.0%	4,159	44.1%
5-6 p.m.	9,432	5	7,132	75.6%	4,989	52.9%
6-7 p.m.	5,088	7.5	4,388	86.2%	2,370	46.6%
7-8 p.m.	2,916	10	2,719	93.2%	1,558	54.4%
8-9 p.m.	2,916	10	2,302	78.9%	1,376	47.2%
9-10 p.m.	2,916	10	1,677	57.5%	1,044	35.8%
10 – 11 p.m.	2,916	10	1,229	42.2%	1,175	40.3%
11 p.m. – 12 a.m.	2,916	10	1,030	35.3%	511	17.5%
12-1 a.m.	2,916	10	287	9.8%	127	4.4%

Table 2-68: No Build (2023) Conditions Ridership and Capacity Summary, Non-core Area, Weekday

Time	Non-core Policy Capacity	Headway (min)	Ridership between North Station- Community College			
			NB	NB % of Capacity	SB	SB % of Capacity
5-6 a.m.	2,088	10	341	16.4%	1,070	51.2%
6-7 a.m.	4,536	7.5	1,208	26.6%	2,784	61.4%
7-8 a.m.	9,432	5	1,874	19.9%	5,835	61.9%
8-9 a.m.	9,432	5	1,978	21.0%	7,667	81.3%
9-10 a.m.	2,610	8	1,381	52.9%	4,150	159.0%
10-11 a.m.	2,610	8	1,140	43.7%	2,334	89.4%
11 a.m. – 12 p.m.	2,610	8	1,254	48.0%	2,009	77.0%
12-1 p.m.	2,610	8	1,431	54.8%	1,923	73.7%
1-2 p.m.	4,253	8	1,825	42.9%	1,838	42.9%
2-3 p.m.	5,895	8	2,308	39.2%	2,005	34.0%
3-4 p.m.	7,255	6.5	3,369	46.4%	2,121	29.2%
4-5 p.m.	9,432	5	5,313	56.3%	2,205	23.4%
5-6 p.m.	9,432	5	6,778	71.9%	2,563	27.2%
6-7 p.m.	4,536	7.5	4,158	91.7%	1,331	29.3%
7-8 p.m.	2,088	10	2,563	122.7%	889	42.6%
8-9 p.m.	2,088	10	2,160	103.4%	908	43.5%
9-10 p.m.	2,088	10	1,571	75.2%	605	29.0%
10-11 p.m.	2,088	10	1,399	67.0%	447	21.4%
11 p.m. – 12 a.m.	2,088	10	958	45.9%	204	9.8%
12-1 a.m.	2,088	10	291	13.9%	76	3.6%

Table 2-69: No Build (2023) Conditions Ridership and Capacity Summary, Core Area, Saturday

Time	Core Policy Capacity	Headway (min)	Ridership between Downtown Crossing - State			
			NB	NB % of Capacity	SB	SB % of Capacity
5-6 a.m.	2,916	10	517	17.7%	432	14.8%
6-7 a.m.	2,916	10	404	13.9%	874	30.0%
7-8 a.m.	2,916	10	723	24.8%	1,330	45.6%
8-9 a.m.	2,916	10	1,195	41.0%	1,418	48.6%
9-10 a.m.	2,916	10	1,103	37.8%	1,703	58.4%
10-11 a.m.	2,916	10	1,370	47.0%	1,668	57.2%
11 a.m. – 12 p.m.	2,916	10	1,748	60.0%	1,801	61.8%
12-1 p.m.	2,916	10	1,806	61.9%	1,926	66.0%
1-2 p.m.	2,916	10	1,852	63.5%	1,808	62.0%
2-3 p.m.	2,916	10	1,949	66.8%	1,825	62.6%
3-4 p.m.	3,240	9	2,145	66.2%	2,029	62.6%
4-5 p.m.	3,645	8	2,264	62.1%	1,997	54.8%
5-6 p.m.	3,645	8	2,111	57.9%	2,148	58.9%
6-7 p.m.	3,240	9	1,746	53.9%	1,568	48.4%
7-8 p.m.	2,916	10	1,479	50.7%	1,324	45.4%
8-9 p.m.	2,916	10	1,457	50.0%	1,094	37.5%
9-10 p.m.	2,916	10	1,323	45.4%	1,004	34.4%
10-11 p.m.	2,916	10	1,551	53.2%	948	32.4%
11 p.m. – 12 a.m.	2,916	10	1,287	44.2%	744	25.5%
12-1 a.m.	2,916	10	594	20.4%	319	10.9%

Table 2-70: No Build (2023) Conditions Ridership and Capacity Summary, Non-core Area, Saturday

Time	Non-core Policy Capacity	Headway (min)	Ridership between North Station – Community College			
			NB	NB % of Capacity	SB	SB % of Capacity
5-6 a.m.	2,088	10	162	7.7%	282	13.5%
6-7 a.m.	2,088	10	273	11.8%	686	29.6%
7-8 a.m.	2,088	10	454	17.4%	1,004	38.5%
8-9 a.m.	2,088	10	974	37.3%	1,159	44.4%
9-10 a.m.	2,088	10	587	22.5%	1,744	66.8%
10-11 a.m.	2,088	10	733	28.1%	1,539	58.9%
11 a.m. – 12 p.m.	2,088	10	894	34.2%	1,929	73.9%
12-1 p.m.	2,088	10	865	37.0%	1,961	75.1%
1-2 p.m.	2,088	10	947	36.3%	1,636	62.7%
2-3 p.m.	2,088	10	1,186	45.4%	1,580	60.5%
3-4 p.m.	2,320	9	1,491	57.1%	1,579	60.5%
4-5 p.m.	2,610	8	1,724	66.0%	1,457	55.8%
5-6 p.m.	2,610	8	1,862	71.3%	1,214	46.5%
6-7 p.m.	2,320	9	1,619	69.8%	952	41.0%
7-8 p.m.	2,088	10	1,427	68.3%	876	41.9%
8-9 p.m.	2,088	10	1,252	60.0%	671	32.1%
9-10 p.m.	2,088	10	1,252	60.0%	536	25.6%
10-11 p.m.	2,088	10	1,349	64.6%	553	26.5%
11 p.m. – 12 a.m.	2,088	10	1,240	59.4%	353	16.9%
12-1 a.m.	2,088	10	601	28.8%	145	6.9%

2.4.2.4 BUILD CONDITIONS

Similar to the Existing and No Build Conditions, a full day of ridership data (weekday and Saturday) was analyzed for the peak core area loadpoint between Downtown Crossing and State stations and the peak northerly non-core area loadpoint between North Station and Community College for the Build (2023) Condition. To estimate Build ridership, expected Project patron and employee trips were added to No-Build ridership.

As shown in Figure 2-101 and Figure 2-102, the Project trips do not cause the Orange Line to exceed capacity within the core area at any point throughout a typical weekday or Saturday. Outside the core area, weekday Project trips do not cause any additional periods to exceed capacity, as shown in Figure 2-103 and Figure 2-104. As in the No Build (2023) Condition, on a typical weekday, ridership exceeds capacity during the 9:00 a.m. to 10:00 a.m. period in the southbound direction in the core area, and exceeds capacity during the 9:00 a.m. to 10:00 a.m. period (southbound), the 7:00 p.m. to 8:00 p.m. period (northbound), and the 8:00 p.m. to 9:00 p.m. period (northbound) in the non-core area. On a typical Saturday, additional Project trips cause the Orange Line to exceed capacity in the southbound direction during the 12:00 p.m. to 1:00 p.m. period; however, capacity is exceeded by just five passengers over the course of an hour, which equates to less than one passenger per train. Build (2023) Condition ridership and capacity are shown in Tables 2-71, 2-72, 2-73, and 2-74.

Table 2-71: Build (2023) Conditions Ridership and Capacity Summary, Core Area, Weekday

Time	Core Policy Capacity	Headway (min)	Ridership between Downtown Crossing - State			
			NB	NB % of Capacity	SB	SB % of Capacity
5-6 a.m.	2,916	10	569	19.5%	1,228	42.1%
6-7 a.m.	3,888	7.5	2,120	54.5%	3,468	89.2%
7-8 a.m.	9,432	5	3,887	41.2%	6,369	67.5%
8-9 a.m.	9,432	5	5,338	56.6%	7,729	81.9%
9-10 a.m.	3,645	8	2,204	60.5%	4,136	113.5%
10-11 a.m.	3,645	8	1,885	51.7%	2,797	76.7%
11 a.m. – 12 p.m.	3,645	8	1,965	53.9%	2,297	63.0%
12-1 p.m.	3,645	8	2,121	58.2%	2,439	66.9%
1-2 p.m.	4,770	8	2,397	50.3%	2,468	51.7%
2-3 p.m.	5,895	8	2,987	50.7%	3,018	51.2%
3-4 p.m.	6,737	6.5	4,312	59.4%	3,233	44.6%
4-5 p.m.	9,432	5	6,056	64.2%	4,296	45.5%
5-6 p.m.	9,432	5	7,241	76.8%	5,092	54.0%
6-7 p.m.	5,088	7.5	4,530	89.0%	2,513	49.4%
7-8 p.m.	2,916	10	2,886	99.0%	1,786	61.2%
8-9 p.m.	2,916	10	2,454	84.2%	1,547	53.0%
9-10 p.m.	2,916	10	1,874	64.3%	1,213	41.6%
10-11 p.m.	2,916	10	1,447	49.6%	1,345	46.1%
11 p.m. – 12 a.m.	2,916	10	1,264	43.3%	644	22.1%
12-1 a.m.	2,916	10	450	15.4%	201	6.9%

Table 2-72: Build (2023) Conditions Ridership and Capacity Summary, Non-core Area, Weekday

Time	Non-core Policy Capacity	Headway (min)	Ridership between North Station - Community College			
			NB	NB% of Capacity	SB	SB % of Capacity
5-6 a.m.	2,088	10	394	18.9%	1,105	52.9%
6-7 a.m.	4,536	7.5	1,263	27.8%	2,822	62.2%
7-8 a.m.	9,432	5	1,910	20.2%	5,874	62.3%
8-9 a.m.	9,432	5	2,007	21.3%	7,715	81.8%
9-10 a.m.	4,253	8	1,436	55.0%	4,254	163.0%
10-11 a.m.	2,610	8	1,207	46.2%	2,457	94.1%
11 a.m. – 12 p.m.	2,610	8	1,338	51.3%	2,134	81.8%
12-1 p.m.	2,610	8	1,528	58.5%	2,059	78.9%
1-2 p.m.	4,253	8	1,937	45.6%	1,987	46.7%
2-3 p.m.	5,895	8	2,448	41.5%	2,163	36.7%
3-4 p.m.	7,255	6.5	3,542	48.8%	2,262	31.2%
4-5 p.m.	9,432	5	5,423	57.5%	2,342	24.8%
5-6 p.m.	9,432	5	6,886	73.0%	2,665	28.3%
6-7 p.m.	4,536	7.5	4,300	94.8%	1,475	32.5%
7-8 p.m.	2,088	10	2,730	130.7%	1,087	52.1%
8-9 p.m.	2,088	10	2,313	110.8%	1,079	51.7%
9-10 p.m.	2,088	10	1,768	84.7%	763	37.0%
10-11 p.m.	2,088	10	1,617	77.4%	617	29.6%
11 p.m. – 12 a.m.	2,088	10	1,192	57.1%	337	16.2%
12-1 a.m.	2,088	10	455	21.8%	150	7.2%

Table 2-73: Build (2023) Conditions Ridership and Capacity Summary, Core Area, Saturday

Time	Core Policy Capacity	Headway (min)	Ridership between Downtown Crossing - State			
			NB	NB % of Capacity	SB	SB % of Capacity
5-6 a.m.	2,916	10	552	18.9%	493	16.9%
6-7 a.m.	2,916	10	445	15.3%	945	32.4%
7-8 a.m.	2,916	10	767	26.3%	1,398	47.9%
8-9 a.m.	2,916	10	1,250	42.9%	1,484	50.9%
9-10 a.m.	2,916	10	1,199	41.1%	1,801	61.8%
10-11 a.m.	2,916	10	1,489	51.1%	1,769	60.7%
11 a.m. – 12 p.m.	2,916	10	1,887	64.7%	1,914	65.6%
12-1 p.m.	2,916	10	1,971	67.6%	2,057	70.5%
1-2 p.m.	2,916	10	2,036	69.8%	1,951	66.9%
2-3 p.m.	2,916	10	2,153	73.8%	1,986	68.1%
3-4 p.m.	3,240	9	2,333	72.0%	2,181	67.3%
4-5 p.m.	3,645	8	2,475	67.9%	2,175	59.7%
5-6 p.m.	3,645	8	2,276	62.4%	2,314	63.5%
6-7 p.m.	3,240	9	1,899	58.6%	1,744	53.8%
7-8 p.m.	2,916	10	1,678	57.5%	1,472	50.5%
8-9 p.m.	2,916	10	1,602	54.9%	1,243	42.6%
9-10 p.m.	2,916	10	1,496	51.3%	1,197	41.1%
10-11 p.m.	2,916	10	1,744	59.8%	1,195	41.1%
11 p.m. – 12 a.m.	2,916	10	1,514	51.9%	949	32.6%
12-1 a.m.	2,916	10	717	24.6%	548	18.8%

Table 2-74: Build (2023) Conditions Ridership and Capacity Summary, Non-core Area, Saturday

Time	Non-core Policy Capacity	Headway (min)	Ridership between North Station – Community College			
			NB	NB % of Capacity	SB	SB % of Capacity
5-6 a.m.	2,088	10	198	9.5%	344	16.5%
6-7 a.m.	2,088	10	315	15.1%	758	36.4%
7-8 a.m.	2,088	10	498	23.9%	1,072	51.4%
8-9 a.m.	2,088	10	1,029	49.3%	1,225	58.8%
9-10 a.m.	2,088	10	683	32.7%	1,842	88.4%
10-11 a.m.	2,088	10	852	40.8%	1,639	78.7%
11 a.m. – 12 p.m.	2,088	10	1,033	49.4%	2,042	98.0%
12-1 p.m.	2,088	10	1,129	54.1%	2,093	100.2%
1-2 p.m.	2,088	10	1,132	54.2%	1,778	85.4%
2-3 p.m.	2,088	10	1,390	66.6%	1,740	83.6%
3-4 p.m.	2,320	9	1,678	72.3%	1,730	74.8%
4-5 p.m.	2,610	8	1,935	74.1%	1,635	62.8%
5-6 p.m.	2,610	8	2,027	77.7%	1,380	53.1%
6-7 p.m.	2,320	9	1,772	76.4%	1,128	48.8%
7-8 p.m.	2,088	10	1,626	77.9%	1,024	49.2%
8-9 p.m.	2,088	10	1,397	66.9%	819	39.4%
9-10 p.m.	2,088	10	1,425	68.2%	729	35.1%
10-11 p.m.	2,088	10	1,542	73.8%	803	38.7%
11 p.m. – 12 a.m.	2,088	10	1,466	70.2%	558	27.0%
12-1 a.m.	2,088	10	725	34.7%	374	18.2%

2.4.2.5 ANALYSIS RESULTS: PROJECT PEAK FULL NETWORK ANALYSIS

In addition to the analysis of a full day of Orange Line service at the peak core area and northerly non-core area loadpoints, described in Section 2.4.2.4, the Proponent also analyzed one hour of weekday data for the entire Orange Line network between Back Bay and Oak Grove stations. This analysis has also been previously shared with and reviewed by MassDOT and the MBTA. These stations are where Project patrons are expected to utilize the Orange Line. Approximately 80% of Project patrons and employees that use the Orange Line are expected to access the Orange Line from the south. For purposes of this analysis, all of these patrons are assumed to board the Orange Line at Back Bay station and alight at Wellington Station because of the availability of the Wynn shuttle at this location; Back Bay station is the southernmost core-area station as well as a major commuter rail station. The remaining 20% of patrons are assumed to board at Oak Grove station and alight at Malden Center station due to the availability of the Wynn shuttle at that location.

The time period analyzed was 7:00-8:00 p.m. This represents the first full hour after the p.m. peak period, so existing ridership is similar to peak period ridership, and is also the approximate peak period of the Project. Ridership generally declines after the 7:00 p.m. hour.

Existing (2012) Conditions in Project p.m. Peak Hour

As shown in Table 2-75, estimated ridership does not exceed capacity in the core area from 7:00-8:00 p.m. on weekdays, but does exceed MBTA policy capacity at two loadpoints outside the core area because the policy capacity decreases from 140% of total seats to 100% of total seats (a reduction of 828 passengers) outside of the core area. The two loadpoints at which the policy capacity is estimated to be exceeded are between North Station and Community College and between Community College and Sullivan Square. However, the estimated ridership would still be well below the core-area policy capacity at these loadpoints.

Note that Assembly Station was not open at the time of the data collection, and is not reflected in Table 2-75. Southbound data is not included because a 10-minute headway at this hour is sufficient for all conditions in the southbound direction.

No Build (2023) Conditions in Project p.m. Peak Hour

To assess the impact of additional estimated ridership due to ambient growth in the greater Boston area and the impact of other projects along the Orange Line, a No Build analysis was conducted. In order to estimate No Build (2023) Condition, existing ridership was increased by 11.6%. As shown in Table 2-76, No Build ridership is compared with capacity using the increased ridership. The over-capacity conditions between North Station and Community College persist in the No Build (2023) Condition.

Table 2-75: Existing (2012) Conditions, Orange Line Northbound Ridership, 7:00-8:00 p.m., Weekday

Load Point	Capacity	Northbound Ridership	Northbound % of Capacity
Oak Grove - Malden	2,088	68	3.3%
Malden – Wellington	2,088	1,429	68.4%
Wellington - Sullivan	2,088	1,772	84.9%
Sullivan – Community College	2,088	2,237	107.1%
Community College – North Station	2,088	2,297	110.0%
North Station – Haymarket	2,916	2,211	75.8%
Haymarket – State	2,916	2,287	78.4%
State – Downtown Crossing	2,916	2,437	83.6%
Downtown Crossing – Chinatown	2,916	2,224	76.3%
Chinatown – Tufts	2,916	2,074	71.1%
Tufts – Back Bay	2,916	1,856	63.6%

Orange cell shading indicates a core area loadpoint (Back Bay-North Station). Policy capacity = 140% of seats in core area, 100% of seats outside core area.

Table 2-76: No Build (2023) Conditions, Orange Line Northbound Ridership, 7:00-8:00 p.m., Weekday

Load Point	Capacity	Northbound Ridership	Northbound % of Capacity
Oak Grove - Malden	2,088	76	3.6%
Malden – Wellington	2,088	1,595	76.4%
Wellington - Sullivan	2,088	1,978	94.7%
Sullivan – Community College	2,088	2,496	119.6%
Community College – North Station	2,088	2,563	122.8%
North Station – Haymarket	2,916	2,467	84.6%
Haymarket – State	2,916	2,552	87.5%
State – Downtown Crossing	2,916	2,720	93.3%
Downtown Crossing – Chinatown	2,916	2,482	85.1%
Chinatown – Tufts	2,916	2,315	79.4%
Tufts – Back Bay	2,916	2,071	71.0%

Orange cell shading indicates a core area loadpoint (Back Bay-North Station). Policy capacity = 140% of seats in core area, 100% of seats outside core area.

Build (2023) Conditions in Project p.m. Peak Hour

To assess the impact of estimated Project-generated Orange Line trips, Build trips were added to No Build passenger volumes. The addition of estimated Project trips causes the Orange Line to exceed policy capacity by 21 passengers between Wellington and Sullivan Square stations, as shown in Table 2-77.

Table 2-77: Build (2023) Conditions, Orange Line Northbound Ridership, 7:00-8:00 p.m., Weekday

Load Point	Capacity	Northbound Ridership	Northbound % of Capacity
Oak Grove - Malden	2,088	109	5.2%
Malden – Wellington	2,088	1,595	76.4%
Wellington - Sullivan	2,088	2,145	102.7%
Sullivan – Community College	2,088	2,663	127.6%
Community College – North Station	2,088	2,730	130.7%
North Station – Haymarket	2,916	2,634	90.3%
Haymarket – State	2,916	2,719	93.3%
State – Downtown Crossing	2,916	2,887	99.0%
Downtown Crossing – Chinatown	2,916	2,649	90.8%
Chinatown – Tufts	2,916	2,482	85.1%
Tufts – Back Bay	2,916	2,238	76.8%

Orange cell shading indicates a core area loadpoint (Back Bay-North Station). Policy capacity = 140% of seats in core area, 100% of seats outside core area.

2.4.3 WYNN SHUTTLES

During the Proponent's post-FEIR consultation with MassDOT, MassDOT requested additional analysis of the anticipated interaction between the Proponent's patron and employee shuttle buses and MBTA bus and Orange Line Service at the MBTA's Wellington and Malden Center Orange Line stations. As further described below, that analysis, in consultation with MassDOT and the MBTA demonstrates that (1) patrons and employees will be fully accommodated by the Project shuttle bus service during both peak and off-peak periods; (2) the Project patron and employee shuttle buses will interact in a timely way with Orange Line service at Wellington and Malden Center Orange Line stations; and (3) the Project patron and employee shuttle buses will not interfere with MBTA bus operations at Wellington and Malden Center Stations, as a result of improvements identified in consultation with the MBTA, and to be implemented by the Proponent, as demonstrated by an analysis of MBTA and Project Shuttle curbside operations and interactions in consultation with the MBTA.

Separate patron and employee shuttle bus service to and from the Wellington and Malden Center MBTA stations directly to the Project will make the MBTA Orange Line a convenient travel choice for patrons and employees.

Employees choosing to drive their own cars to work will park off-site in one of three facilities (Malden Center; Station Landing, Medford; and Everett) and transfer to an employee shuttle bus. In total, six shuttle bus routes are planned as described below.

2.4.3.1 WYNN PATRON SHUTTLES

Two separate patron shuttle bus routes will operate between the Project (main entrance) and the MBTA Orange Line stations at Wellington and Malden Center. The patron shuttle bus routes to Wellington Station and Malden Center Station are shown in Figure 2-105 and Figure 2-106. As discussed, in Section 2.1.2, ten percent of patrons are expected to travel to Wynn Everett via the Orange Line. The 10% has been further disaggregated to the Wellington and Malden Center stations by examining the Wynn Everett market distribution. Of all patrons utilizing the Orange Line, it is expected that 80% will use Wellington Station and 20% will use Malden Center Station.

Based on the trip generation characteristics for the Project, an hourly ridership demand profile has been developed for the patron shuttle buses. Using these profiles, the associated required frequency of shuttle bus service has been calculated on an hour-by-hour basis.

The shuttle bus frequency is also a function of shuttle vehicle capacity – the smaller the vehicle, the higher the number of shuttle bus trips necessary to meet the passenger demand. It is likely that 15-passenger vehicles will be used for the Malden Center patron shuttle buses and 30-passenger vehicles will be used for the Wellington patron shuttle buses. However, as the shuttle operating plan evolves, the bus sizes will be adjusted consistent with demand.

For each shuttle route listed below, the hourly ridership and shuttle frequency over a 24-hour period are graphed in as follows:

- Wynn Patron Shuttle to/from Wellington Station – Friday Conditions (Figure 2-107)
- Wynn Patron Shuttle to/from Wellington Station – Saturday Conditions (Figure 2-108)
- Wynn Patron Shuttle to/from Malden Center Station – Friday Conditions (Figure 2-109)
- Wynn Patron Shuttle to/from Malden Center Station – Saturday Conditions (Figure 2-110)

The graphs show hourly ridership demand by direction on the primary vertical axis (left side) and the associated shuttle bus trips per hour (per direction) on the secondary vertical axis (right side). Another way to depict shuttle bus trips per hour is by headway, the time between vehicle arrivals. For example, in Figure 2-107, four shuttle bus trips per hour per direction represents a headway in each direction of 15 minutes (four trips/60 minutes).

Operating characteristics of the proposed shuttle buses are presented in Table 2-78 and 2-79 including stops, routing, ridership, travel times, headway, and vehicles required to maintain headways. The vehicles required to maintain headway were calculated by dividing the cycle time by the headway. In this case, the cycle time is defined as the round trip travel time plus 10%.

Table 2-78: Patron Shuttle Route Characteristics between Wynn Everett and MBTA Wellington Station

Characteristics			
Passengers	Wynn patrons arriving via MBTA Orange Line at Wellington Station		
Stops	Wynn Everett, Wellington Station		
Routing	Route 16, Route 99		
Daily Ridership			
Friday	3,720 one-way person trips		
Saturday	4,420 one-way person trips		
One-way Travel Time			
Off-peak	About 10 minutes		
Peak	About 20 minutes		
Headway	Headway will vary from 6-30 minutes, depending on time of day. See Figures 2-107 and 2-108 for shuttle trips by hour.		
Vehicles Required to Maintain Headway	Headway in Minutes	Vehicles during Off-Peak	Vehicles during Peak
	30 (off-peak only)	1	-
	20 (off-peak only)	2	-
	15	2	3
	12	2	4
	10	3	5
	8.5 (peak only)	-	6
	7.5 (peak only)	-	6
	6.5 (peak only)	-	7

Table 2-79: Patron Shuttle Route Characteristics between Wynn Everett and MBTA Malden Center Station

Characteristics			
Passengers	Wynn patrons arriving via MBTA Orange Line at Malden Center Station		
Stops	Wynn Everett, Malden Center Station		
Routing	Route 60 – Commercial Street – Route 16 – Route 99		
Daily Ridership			
Friday	930 one-way person trips		
Saturday	1,104 one-way person trips		
One-way Travel Time			
Off-peak	About 20 minutes		
Peak	About 30 minutes		
Headway	Headway will vary from 12-30 minutes, depending on time of day. See Figures 2-109 and 2-110 for shuttle trips by hour.		
Vehicles Required to Maintain Headway	Headway in Minutes	Vehicles during Off-Peak	Vehicles during Peak
	30 (off-peak only)	2	-
	20	3	4
	15	3	5
	12 (peak only)	-	6

2.4.3.2 WYNN EMPLOYEE SHUTTLES

Employee Off-site Parking and MBTA Shuttle

Three separate employee shuttle bus routes will operate between the Project's employee entrance and off-site employee parking facilities in Medford adjacent to Wellington Station, Malden at a downtown garage, and potentially in Everett at a location to be determined.

The employee shuttle bus routes serving the Wellington and Malden parking facilities are shown in Figure 2-111 and Figure 2-112, respectively. The Wynn shuttle bus to the Wellington employee parking facility will also carry employees to and from the MBTA's Wellington Station. Employees arriving at Wellington Station via the Orange Line will walk from the station to the parking facility; the walking route is shown in Figure 2-111.

While no specific parking site has been identified for the Everett employee parking lot, the plan is to locate it in the industrial southeast

quadrant of Everett, generally south of Revere Beach Parkway (Route 16) and east of Broadway (Route 99). That area can be seen in Figure 2-112, which also shows the preliminary neighborhood employee bus shuttle route discussed below.

Table 2-80 shows the predicted modes of Project employee travel on Fridays and Saturdays by percentage and person trips. As shown, 41% of employees are expected to drive and park at the employee off-site parking facilities and 20% of employees are expected to travel to the Project via the Orange Line. Another 20% of employees will use the neighborhood shuttle, and the remaining 19% will use the other travel modes listed in Table 2-80.

Table 2-80: Daily Employee Person Trips by Travel Mode

Travel Mode	Friday		Saturday	
	Person Trips	Travel Mode Share	Person Trips	Travel Mode Share
SOV				
Private Automobiles	2,776	41%	3,338	41%
Taxis	0	0%	0	0%
Subtotal – SOV	2,776	41%	3,338	41%
Non-SOV				
Orange Line to Wynn Employee Shuttle	1,354	20%	1,628	20%
Employee Neighborhood Shuttle	1,354	20%	1,628	20%
Water Transportation	204	3%	244	3%
MBTA Bus	678	10%	814	10%
Premium Park and Ride	204	3%	244	3%
Walk/Bike	204	3%	244	3%
Subtotal – Non-SOV	3,998	59%	4,802	59%
TOTAL	6,774	100%	8,140	100%

Because employees (except a limited number of Wynn executives and employees with disabilities) who choose to drive must park at one of the off-site parking facilities and transfer to a shuttle, 100% of employees (except a limited number of Wynn executives and employees with disabilities) will arrive at the Project Site via non-SOV modes. When the driving trip segment to the off-site parking facilities is considered, however, 41% will arrive via SOV modes and 59% via non-SOV modes.

To provide the most efficient employee shuttle operations, all Project employees utilizing the Orange Line will be required to use Wellington Station.

Neighborhood Employee Shuttle

In addition to the employee shuttle buses described above, a separate employee shuttle bus route will serve the local neighborhood. At this time, the employee neighborhood shuttle is anticipated to operate separately from other shuttle buses, but shuttle segments may be combined to best serve employee demand. A preliminary route for this shuttle is shown in Figure 2-113. Because preference in hiring will be given to Everett residents, it has been assumed that 20% of employees will use this service. Specific routing and stops will be identified as workers are hired. This route will operate 24 hours/day.

Analysis of Shuttle Service Capacity

Based on the trip generation characteristics for the Project, an hourly ridership demand profile has been developed for the employee shuttle buses. Using these profiles, the associated required frequency of shuttle bus service has been calculated on an hour-by-hour basis.

The shuttle bus frequency is also a function of shuttle vehicle capacity – the smaller the vehicle, the higher the number of shuttle bus trips necessary to meet the passenger demand. It is likely that 15-passenger vehicles will be used for the Malden Center employee shuttle buses and 30-passenger vehicles will be used for the Wellington employee shuttle buses. However, as the shuttle operating plan evolves, the bus sizes will be adjusted consistent with demand.

For each employee shuttle route listed below, the hourly ridership and shuttle frequency over a 24-hour period are graphed in as follows:

- Wynn Employee Shuttle to/from Wellington Parking Facility – Friday Conditions (Figure 2-114)
- Wynn Employee Shuttle to/from Wellington Parking Facility– Saturday Conditions (Figure 2-115)
- Wynn Employee Shuttle to/from Malden Parking Facility– Friday Conditions (Figure 2-116)
- Wynn Employee Shuttle to/from Malden Parking Facility– Saturday Conditions (Figure 2-117)

Because the location of the Everett off-site employee parking facility has not yet been determined and the specific operating characteristics (stops, routing, travel times) of the neighborhood shuttle are not yet known,

ridership demand graphs have not been developed for these two routes. However, the ridership demand over the day will be similar to that exhibited on the employee shuttle to and from the Malden parking facility, with a peak Friday demand of about 40 employees per hour on Friday and 55 employees on Saturday, indicating that a headway of 15-30 minutes will be required depending on the time of day.

While the current analysis in this memorandum reflects a thorough evaluation of available data and anticipated conditions, the shuttle bus operating plan will necessarily evolve as operational data is generated. However, employee travel timing will be managed to ensure sufficient capacity and optimize the efficiency of shuttle operations through measures such as employee travel time restrictions and assigning employees to specific parking lot locations.

Operating characteristics of the proposed employee shuttles are presented in Table 2-81, Table 2-82, Table 2-83, and Table 2-84 including stops, routing, ridership, travel times, headway, and vehicles required to maintain headways. The vehicles required to maintain headway were calculated by dividing the cycle time by the headway. In this case, the cycle time is defined as the round trip travel time plus 10%.

Table 2-81: Employee Shuttle Characteristics between Wynn Everett and Wellington Parking Facility

Characteristics			
Passengers	Wynn employees who have parked at Wellington parking facility or utilize the MBTA Orange Line		
Stops	Wynn Everett, Wellington/Station Landing parking facility		
Routing	Route 16 – Route 99		
Daily Ridership			
Friday	2,270 one-way person trips		
Saturday	2,926 one-way person trips		
One-way Travel Time			
Off-peak	About 10 minutes		
Peak	About 20 minutes		
Headway	Headway will vary from 12-30 minutes, depending on time of day. See Figures 2-114 and 2-115 for shuttle trips by hour.		
Vehicles Required to Maintain Headway	Headway in Minutes	Vehicles during Off-Peak	Vehicles during Peak
	30 (off-peak only)	1	-
	20 (off-peak only)	2	-
	15	2	3
	12	2	4

Table 2-82: Employee Shuttle Characteristics between Wynn Everett and Downtown Malden Parking Facility

Characteristics			
Passengers	Wynn employees who have parked at Malden parking facility		
Stops	Wynn Everett, Malden Center parking facility		
Routing	Route 60 – Commercial Street – Route 16 – Route 99		
Daily Ridership			
Friday	922 one-way person trips		
Saturday	1,188 one-way person trips		
One-way Travel Time			
Off-peak	About 20 minutes		
Peak	About 30 minutes		
Headway	Headway will vary from 15-30 minutes, depending on time of day. See Figures 2-116 and 2-117 for shuttle trips by hour.		
Vehicles Required to Maintain Headway	Headway in Minutes	Vehicles during Off-Peak	Vehicles during Peak
	30 (off-peak only)	2	-
	20	3	4
	15 (peak only)	-	5

Table 2-83: Employee Shuttle Characteristics between Wynn Everett and Everett Off-site Employee Parking Facility (To Be Determined)

Characteristics	
Passengers	Wynn employees who have parked at Everett off-site parking facility
Stops	Wynn Everett, Everett off-site employee parking facility
Routing	TBD
Daily Ridership	
Friday	922 one-way person trips
Saturday	1,188 one-way person trips
One-way Travel Time	
Off-peak	About 5 minutes
Peak	About 10 minutes
Headway	Headway will vary from 15-30 minutes, depending on time of day.
Vehicles Required to Maintain Headway	One vehicle

Table 2-84: Employee Shuttle Characteristics between Wynn Everett and Everett Neighborhood Locations (To Be Determined)

Characteristics	
Passengers	Wynn employees who live in Everett neighborhood
Stops	TBD
Routing	See Figure 2-109 for preliminary routing plan
Hours of Operation	24 hours
Daily Ridership	
Friday	922 one-way person trips
Saturday	1,188 one-way person trips
One-way Travel Time	TBD
Headway	Headway will vary from 15-30 minutes, depending on time of day.
Vehicles Required to Maintain Headway	TBD

2.4.3.3 COMPARISON OF MBTA BUS SERVICE CAPACITY WITH WYNN SHUTTLE BUS CAPACITIES

During the Proponent's post-FEIR consultation with MassDOT and the MBTA, MassDOT, and the MBTA requested additional information about the extent to which the Proponent's proposed patron and employee shuttle bus service would duplicate bus service already provided by the MBTA. As explained further below and as already been shared with MassDOT and the MBTA, that is not the case. The Wynn

shuttle buses will provide distinctive functions for patrons and employees.

MBTA buses on Route #104 and Route #105 both travel between Malden Center Station and Sullivan Square Station and will serve Wynn Everett with a stop on Broadway (Route 99) southbound near the main entrance. The MBTA routes travel different roadway segments and primarily serve residential areas of Malden and Everett with a connection to either Orange Line station. Route #104 travels Ferry Street between Broadway (Route 99) and Malden Center and Route #105 travels Main Street between Broadway (Route 99) and Malden Center.

While certain of Wynn's patron and employee shuttle buses will also travel on the segment of Broadway (Route 99) south of Revere Beach Parkway (Route 16), for the most part the shuttle routes will be different from MBTA bus Route #104. From Malden Center, the Wynn shuttle buses will travel south on Commercial Street, east on Route 16, and then south on Broadway to the Project Site, as shown in Figure 2-112 and Figure 2-114.

Route #104 operates between 5:10 a.m. and 1:00 a.m. with 14-minute peak headways and Route #105 operates between 5:00 a.m. and 7:00 p.m. with 70-minute headways. Project employees who live in neighborhoods near Route #104 and Route #105 stops are expected to use these buses to travel to work. For travel to and from Malden Center Station, the Project employee shuttle buses will be faster (there are no intermediate stops planned on the Project shuttle routes) and more frequent than the MBTA bus. Therefore, it is expected that all Project patrons and employees travelling to and from Malden Center Station will utilize the Proponent's shuttle buses.

No MBTA bus provides direct service between Wellington Station and Broadway near the Project. The Project's employee and patron shuttles will provide this direct service, as described above.

In summary, while segments of the existing MBTA bus routes do coincide with segments of Wynn's proposed Malden Center shuttle bus routes, the Wynn shuttle buses will provide faster and more frequent connections for patrons and employees and will provide services at later hours and/or more directly connecting to other Orange Line stations.

2.4.3.4 WELLINGTON AND MALDEN CENTER STATIONS

During the Proponent's post-FEIR consultation with MassDOT and the MBTA, MassDOT and the MBTA requested additional evaluations to ensure that the Proponent's shuttle buses interact with Orange Line service at Wellington and Malden Center stations in a sufficiently timely manner so as to attract and retain riders. That evaluation, already shared with, and reviewed by, MassDOT and the MBTA appears below.

As a measure of how the Project shuttle system (with the routings and headways described in earlier sections) will provide well-timed service with the Orange Line, Table 2-85 presents a summary of average wait times for patrons who have arrived at Wellington and Malden Center stations via the Orange Line and will board an available shuttle bus to Wynn Everett. Average wait times are calculated as half of the scheduled headway.

Table 2-85: Average Wait Times for Patron Shuttle at Wellington and Malden Center Stations

Condition	< 5 min.	5-9 min.	10-14 min.	15 min.	Total
From Wellington Station to Project					
Friday					
Patrons riding shuttle to Project	263	1,145	313	86	1,806
Percent of patrons by wait time	15%	63%	17%	5%	100%
Saturday					
Patrons riding shuttle to Project	487	1,706	0	58	2,250
Percent of patrons by wait time	21%	76%	0%	3%	100%
From Malden Center Station to Project					
Friday					
Patrons riding shuttle to Project	3	187	240	21	451
Percent of patrons by wait time	1%	41%	53%	5%	100%
Saturday					
Patrons riding shuttle to Project	28	419	57	60	564
Percent of patrons by wait time	5%	74%	10%	11%	100%

As shown in Table 2-85, most patrons utilizing the Orange Line will wait 9 minutes or less for a shuttle bus to the Project. At Wellington Station, the longer wait times occur during the morning hours (between 7:00

a.m. and 12:00 p.m.) when projected Project shuttle bus ridership is relatively low. The average wait time (based on headways presented in Figure 2-107 and Figure 2-108) at Wellington Station is 8 minutes on Friday and 6 minutes on Saturday.

At Malden Station, where projected shuttle bus ridership is expected to be lower than at Wellington Station, the planned shuttle bus headways are also lower (as presented in Figure 2-109 and Figure 2-110), resulting in slightly longer average wait times of 10 minutes on Friday and 9 minutes on Saturday.

The patron shuttle bus services to and from Wellington and Malden Center stations will maintain service schedules similar to that of the Orange Line. Patron shuttle service will begin at 6:00 a.m., 45 minutes after the start of Orange Line service and provide service throughout the day. The last shuttles from the Project back to the MBTA stations will coordinate with the Orange Line's last train.

An hour-by-hour listing of patron shuttle frequency, average patron wait time, shuttle ridership, and Orange Line frequency is presented in Table 2-86 for Wellington Station under Friday conditions, Table 2-87 for Wellington Station under Saturday conditions, Table 2-88 for Malden Center Station under Friday conditions, and Table 2-89 for Malden Center Station under Saturday conditions.

The number of Orange Line trains per shuttle bus run varies due to the variability of headways in the shuttle service, which is governed by expected demand for the service as described in this Section 2.1.3.3 describing the proposed operating characteristics of the Wynn shuttle bus service.

During the morning commuter peak periods on Fridays, when demand for the shuttle is low, one shuttle bus will arrive per 8-12 arriving Orange Line trains. Note that 8-12 trains in both directions are equivalent to 4-6 trains each going northbound and southbound. Shuttle bus frequency increases throughout the day and into the evening. During the Friday evening Wynn casino peak period, shuttle bus headways range from 9-15 minutes, or about one shuttle bus for every two Orange Line trains.

During the evening casino peak period on Saturdays, shuttle buses will operate on headways of as low as 7-15 minutes at Wellington and Malden Center stations, respectively, resulting in short wait times. During these periods, shuttle bus service will be frequent enough that

shuttle buses are expected to arrive about as often as Orange Line trains do.

Table 2-86: Patron Shuttle – Wellington Station to Wynn Everett - Friday

Time	Shuttle Frequency from Wellington (shuttle trips/hour) ¹	Average Wait Time for Shuttle (minutes)	Shuttle Ridership (riders/hour)	Orange Line Frequency (Northbound and Southbound) (train trips/hour) ²
5:00 a.m. – 6:00 a.m.	0	0	0	12
6:00 a.m. – 7:00 a.m.	2	15	30	16
7:00 a.m. – 8:00 a.m.	2	15	28	24
8:00 a.m. – 9:00 a.m.	2	15	30	24
9:00 a.m. – 10:00 a.m.	3	10	64	15
10:00 a.m. – 11:00 a.m.	3	10	80	15
11:00 a.m. – 12:00 p.m.	3	10	87	15
12:00 p.m. – 1:00 p.m.	4	7.5	91	15
1:00 p.m. – 2:00 p.m.	4	7.5	110	15
2:00 p.m. – 3:00 p.m.	4	7.5	119	15
3:00 p.m. – 4:00 p.m.	4	7.5	104	17
4:00 p.m. – 5:00 p.m.	4	7.5	79	24
5:00 p.m. – 6:00 p.m.	4	7.5	101	24
6:00 p.m. – 7:00 p.m.	6	5	128	20
7:00 p.m. – 8:00 p.m.	6	5	151	17
8:00 p.m. – 9:00 p.m.	6	5	152	17
9:00 p.m. – 10:00 p.m.	6	5	147	12
10:00 p.m. – 11:00 p.m.	6	4.2	147	12
11:00 p.m. – 12:00 a.m.	7	4.2	112	12
12:00 a.m. – 1:00 a.m.	5	6	56	12
1:00 a.m. –	4	7.5	43	12

Time	Shuttle Frequency from Wellington (shuttle trips/hour) ¹	Average Wait Time for Shuttle (minutes)	Shuttle Ridership (riders/hour)	Orange Line Frequency (Northbound and Southbound) (train trips/hour) ²
2:00 a.m.				
2:00 a.m. – 3:00 a.m.	0	0	0	4 ³
3:00 a.m. – 4:00 a.m.	0	0	0	0
4:00 a.m. – 5:00 a.m.	0	0	0	0
Total Daily	85	N/A	1,859	349

- 1) For shuttle route, trips per hour in one direction only from Wellington Station to Wynn Everett.
- 2) For Orange Line, trips per hour in both the northbound and southbound directions.
- 3) MBTA Orange Line service stops at 2:14 a.m. late night Friday.

Table 2-87: Patron Shuttle – Wellington Station to Wynn Everett - Saturday

Time	Shuttle Frequency from Wellington (shuttle trips/hour) ¹	Average Wait Time for Shuttle (minutes)	Shuttle Ridership (riders/hour)	Orange Line Frequency (Northbound and Southbound) (train trips/hour) ²
5:00 a.m. – 6:00 a.m.	0	0	0	12
6:00 a.m. – 7:00 a.m.	2	15	29	13
7:00 a.m. – 8:00 a.m.	2	15	28	15
8:00 a.m. – 9:00 a.m.	2	15	37	15
9:00 a.m. – 10:00 a.m.	3	10	64	15
10:00 a.m. – 11:00 a.m.	3	10	81	15
11:00 a.m. – 12:00 p.m.	5	6	100	15
12:00 p.m. – 1:00 p.m.	5	6	123	15
1:00 p.m. – 2:00 p.m.	5	6	143	15
2:00 p.m. – 3:00 p.m.	6	5	163	15
3:00 p.m. – 4:00 p.m.	6	5	146	15
4:00 p.m. – 5:00 p.m.	6	5	172	15
5:00 p.m. – 6:00 p.m.	6	5	133	15
6:00 p.m. – 7:00 p.m.	6	5	124	13
7:00 p.m. – 8:00 p.m.	6	5	157	12
8:00 p.m. – 9:00 p.m.	6	5	104	12
9:00 p.m. – 10:00 p.m.	6	5	125	12
10:00 p.m. – 11:00 p.m.	8	3.8	151	12
11:00 p.m. – 12:00 a.m.	7	4.2	190	12
12:00 a.m. – 1:00 a.m.	7	4.2	93	12

Time	Shuttle Frequency from Wellington (shuttle trips/hour) ¹	Average Wait Time for Shuttle (minutes)	Shuttle Ridership (riders/hour)	Orange Line Frequency (Northbound and Southbound) (train trips/hour) ²
1:00 a.m. – 2:00 a.m.	6	5	45	12
2:00 a.m. – 3:00 a.m.	0	0	0	4 ³
3:00 a.m. – 4:00 a.m.	0	0	0	0
4:00 a.m. – 5:00 a.m.	0	0	0	0
Total Daily	103	N/A	2,208	291

- 1) For shuttle route, trips per hour in one direction only from Wellington Station to Wynn Everett.
- 2) For Orange Line, trips per hour in both the northbound and southbound directions.
- 3) MBTA Orange Line service stops at 2:14 a.m. late night Friday.

Table 2-88: Patron Shuttle – Malden Center Station to Wynn Everett - Friday

Time	Shuttle Frequency from Malden Center (shuttle trips/hour) ¹	Average Wait Time for Shuttle (minutes)	Shuttle Ridership (riders/hour)	Orange Line Frequency (Northbound and Southbound) (train trips/hour) ²
5:00 a.m. – 6:00 a.m.	0	0	0	12
6:00 a.m. – 7:00 a.m.	2	15	8	16
7:00 a.m. – 8:00 a.m.	2	15	7	24
8:00 a.m. – 9:00 a.m.	2	15	8	24
9:00 a.m. – 10:00 a.m.	3	10	16	15
10:00 a.m. – 11:00 a.m.	3	10	20	15
11:00 a.m. – 12:00 p.m.	3	10	22	15
12:00 p.m. – 1:00 p.m.	3	10	23	15
1:00 p.m. – 2:00 p.m.	3	10	28	15
2:00 p.m. – 3:00 p.m.	3	10	30	15
3:00 p.m. – 4:00 p.m.	3	10	26	17
4:00 p.m. – 5:00 p.m.	3	10	20	24
5:00 p.m. – 6:00 p.m.	3	10	25	24
6:00 p.m. – 7:00 p.m.	3	10	32	20
7:00 p.m. – 8:00 p.m.	4	7.5	38	17
8:00 p.m. – 9:00 p.m.	4	7.5	38	17
9:00 p.m. – 10:00 p.m.	4	7.5	37	12
10:00 p.m. – 11:00 p.m.	4	7.5	37	12
11:00 p.m. – 12:00 a.m.	4	7.5	28	12
12:00 a.m. – 1:00 a.m.	3	10	14	12
1:00 a.m. – 2:00 a.m.	3	10	6	12
2:00 a.m. – 3:00 a.m.	0	0	4	4 ³

Time	Shuttle Frequency from Malden Center (shuttle trips/hour) ¹	Average Wait Time for Shuttle (minutes)	Shuttle Ridership (riders/hour)	Orange Line Frequency (Northbound and Southbound) (train trips/hour) ²
3:00 a.m. – 4:00 a.m.	0	0	0	0
4:00 a.m. – 5:00 a.m.	0	0	0	0
Total Daily	62	N/A	465	349

- 1) For shuttle route, trips per hour in one direction only from Malden Center Station to Wynn Everett.
- 2) For Orange Line, trips per hour in both the northbound and southbound directions.
- 3) MBTA Orange Line service stops at 2:14 a.m. late night Friday.

Table 2-89: Patron Shuttle – Malden Center Station to Wynn Everett - Saturday

Time	Shuttle Frequency from Malden Center (shuttle trips/hour) ¹	Average Wait Time for Shuttle (minutes)	Shuttle Ridership (riders/hour)	Orange Line Frequency (Northbound and Southbound) (train trips/hour) ²
5:00 a.m. – 6:00 a.m.	0	0	0	12
6:00 a.m. – 7:00 a.m.	2	15	7	13
7:00 a.m. – 8:00 a.m.	2	15	7	15
8:00 a.m. – 9:00 a.m.	2	15	9	15
9:00 a.m. – 10:00 a.m.	2	15	16	15
10:00 a.m. – 11:00 a.m.	2	15	20	15
11:00 a.m. – 12:00 p.m.	3	10	25	15
12:00 p.m. – 1:00 p.m.	3	10	31	15
1:00 p.m. – 2:00 p.m.	4	7.5	36	15
2:00 p.m. – 3:00 p.m.	4	7.5	41	15
3:00 p.m. – 4:00 p.m.	4	7.5	36	15
4:00 p.m. – 5:00 p.m.	4	7.5	43	15
5:00 p.m. – 6:00 p.m.	4	7.5	33	15
6:00 p.m. – 7:00 p.m.	4	7.5	31	13
7:00 p.m. – 8:00 p.m.	4	7.5	39	12
8:00 p.m. – 9:00 p.m.	4	7.5	26	12
9:00 p.m. – 10:00 p.m.	4	7.5	31	12
10:00 p.m. – 11:00 p.m.	5	6	38	12
11:00 p.m. – 12:00 a.m.	5	6	48	12
12:00 a.m. – 1:00 a.m.	5	6	23	12
1:00 a.m. – 2:00 a.m.	5	6	8	12
2:00 a.m. – 3:00 a.m.	0	0	3	4 ³

Time	Shuttle Frequency from Malden Center (shuttle trips/hour) ¹	Average Wait Time for Shuttle (minutes)	Shuttle Ridership (riders/hour)	Orange Line Frequency (Northbound and Southbound) (train trips/hour) ²
3:00 a.m. – 4:00 a.m.	0	0	0	0
4:00 a.m. – 5:00 a.m.	0	0	0	0
Total Daily	63	N/A	552	291

1) For shuttle route, trips per hour in one direction only from Malden Center Station to Wynn Everett.

2) For Orange Line, trips per hour in both the northbound and southbound directions.

3) MBTA Orange Line service stops at 2:14 a.m. late night Friday.

MBTA Bus and Wynn Shuttle Bus Interactions at Wellington and Malden Center Stations

As is discussed in Section 2.5.1, the Proponent has collaborated with MassDOT and the MBTA since the FEIR on an evaluation of the interaction of existing MBTA bus service and the Proponent's shuttle bus service at the Wellington and Malden Center stations, and improvements to those stations by the Proponent, to assure that those services are both able to utilize those stations without operational difficulties. Layover schedules for each bus bay analyzed at the Wellington and Malden Center stations are included in Appendix B.

The Proponent will continue to work with the MBTA's Bus Operations, Real Estate, and Parking personnel to finalize the plans developed to date in collaboration with the MBTA that are described in the following sections.

Wellington Station

The existing configuration of the curbside area adjacent to Wellington Station is shown in Figure 2-118. Analysis of the usage of the existing bus bays indicated that there are not currently opportunities for the Project's patron shuttles to share curb space with any of the existing bus routes acceptable to the MBTA. As a result, the Proponent has developed, in consultation with the MBTA, a plan to provide the Proponent's patron shuttles with exclusive curb space.

The plan includes the construction of a fourth curb north of the existing shuttle/taxi/general auto pick-up/drop-off curb. The general pick-up/drop-off and taxi activity would occur at that location, and the Proponent's patron shuttle bus and other private shuttles would use the existing third curb, as shown in Figure 2-118. The reconfiguration of the parking lot to

accommodate the fourth curb will result in additional revenue-generating parking spaces for the MBTA at Wellington Station. The MBTA's Director of Parking has indicated that the MBTA is in the process of upgrading the revenue control system at Wellington Station. The Proponent will work with the MBTA to incorporate the upgrades to revenue control in the proposed plan.

Malden Center Station

At Malden Center Station, the plan developed in consultation with the MBTA to accommodate the Proponent's shuttle buses is for them to berth along the southern curb in the western bus bay, where enough space will still remain for an MBTA bus to lay over. This layout also ensures that MBTA buses will still be able to turn into the busway when a Wynn shuttle bus is parked along the southern curb of the busway.

The curb configuration at Malden Center Station is shown in Figure 2-119. The proposed Wynn shuttle bus berth at Malden Station is located along the busway on the west side of station. This busway is not used as frequently as the busway on the east side of the station. The southern curb in the western bus bay is not devoted to any bus stop. It is frequently used as a place for buses to lay over between trips. Each of the three sections of this southern curb is long enough to hold two MBTA buses.

As shown in Figure 2-119, the proposed Wynn shuttle bus berthing location is far enough south so that one bus may layover in this area while still allowing buses to turn into the busway. As laid out in Figure 2-119, this southern curb can still be used by one MBTA bus while providing a dedicated Project shuttle berth location and allowing MBTA buses to turn into the busway without conflict. The Proponent will reconstruct the sidewalk from the station along this curb to ensure that it is ADA-compliant. The Proponent may also place a passenger shelter on MBTA property near the corner of the busway and Centre Street (Route 60).

2.4.3.5 PREMIUM PARK AND RIDE SERVICE

The Proponent will establish a new bus service called Premium Park and Ride, which will provide service between come number of the Massport Logan Express parking facilities located in Braintree, Framingham, and/or Woburn or similar facilities and the Project. The PPR service is 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 that choose to use the Premium Park and Ride service would not be charged for the service, thus providing an incentive for both groups to use the service.

2.5 PEDESTRIAN AND BICYCLE EVALUATIONS AND OUTCOMES SINCE FEIR

The Project will include a shared use path intended to provide continuous bicycle and pedestrian access and amenities along the waterfront. Pending agreements with DCR, the MBTA, and the owner of the Gateway Center, a pedestrian and bicycle connection consistent with the Project's harborwalk will be made to DCR's Gateway Park. It will be provided beneath and along the MBTA Commuter Rail. The Project's harborwalk will also connect to the pedestrian and bicycle facilities along Broadway (Route 99). The new Gateway Park Connector will be improved with amenities such as an ADA-compliant surface, benches, landscaping, and lighting. These improvements are intended to have a positive impact on the future Bay State Greenway, which is planned by the State, by providing additional links between sections of pedestrian and bicycle infrastructure. Pedestrian and bicycle circulation on the Project Site is shown in Figure 2-120. The Proponent has also proposed pedestrian and bicycle improvements as part of the off-site transportation improvements on Lower Broadway/Alford Street (Route 99) (see Section 2.2.1.1), Santilli Circle (see Section 2.2.2.1), Sweetser Circle (see Sections 2.2.3.1 and 2.2.3.2), and Sullivan Square (see Section 2.2.7.1).

2.6 TDM PLAN EVALUATIONS AND OUTCOMES SINCE FEIR

The Proponent is committed to implementing TDM measures that encourage both patrons and employees to travel to the Project via the many available non-automobile travel modes. Enhanced TDM strategies, as a means of reducing automobile trips, were described in detail in Section 4.16 of the FEIR and are reflected in the travel mode shares described in Section 2.1.2.

2.7 TRANSPORTATION MONITORING PLAN

The elements of the post-development transportation monitoring and survey program for the Project have been expanded in response to the Secretary's Certificate and comments received from MassDOT, MAPC, and the City of Medford on the program outlined in the FEIR, and are consistent with the transportation monitoring requirements of the MGC for the Project. Specifically, at the request of MassDOT, ***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.*** In addition, the scope of the monitoring program has been expanded to include additional roadways and intersections

identified by the City of Medford, as well as boarding/alighting information for specific bus routes. Changes to the elements of the transportation monitoring and survey program for the Project from those defined in the FEIR are indicated by ***bold italicized*** text for identification.

The purpose of the program is to 1) evaluate the accuracy of the assumptions used in completing the transportation impact analysis for the Project, 2) evaluate the adequacy of the transportation mitigation measures, and 3) determine the effectiveness of the TDM program, as presented in the FEIR.

The monitoring program will be completed by an independent organization approved by the MGC and paid for by the Proponent and include the elements listed below.

2.7.1 DATA COLLECTION

Traffic Counts

- Conducted twice annually.
- Automatic traffic recorder counts over a continuous seven-day, weeklong period at the following locations:
 - The primary driveway and service driveway to the Project, Everett;
 - ***Harvard Street, Medford;***
 - ***Mystic Avenue (Route 38), Medford;***
 - ***Fellsway (Route 28), Medford;***
 - ***Riverside Avenue, Medford; and***
 - ***Rivers Edge Drive, Medford.***
- Peak period manual turning movement, vehicle classification, and pedestrian/bicycle counts on a Thursday and Friday between 4:00 - 6:00 p.m. and on a Saturday between 2:00 - 5:00 p.m. at the following intersections:
 - Intersection 1 – Wynn Primary Driveway/Broadway (Route 99), Everett
 - Intersection 7 – Wynn Service Driveway/Beacham Street/Broadway (Route 99), Everett
 - Intersection 10 - Santilli Circle (Revere Beach Parkway (Route 16)/Santilli Highway/Mystic View Road/Route 99 Connector), Everett
 - Intersection 11 - Sweetser Circle (Revere Beach Parkway (Route 16)/Broadway (Route 99)/Main Street, Everett
 - Intersection 32 - Bell Circle (Beach Street/Everett Street/Route 1A/Route 16/Route 60), Revere

- **Intersection 38 – Harvard Street/Mystic Avenue (Route 38)/Mystic Valley Parkway (Route 16), Medford**
- **Intersection 39 – Mystic Valley Parkway (Route 16)/Mystic Valley Parkway (Route 16) Southbound Connector, Medford**
- Intersection 42 - Wellington Circle (Mystic Valley/Revere Beach Parkway (Route 16)/Fellsway (Route 28)/Middlesex Avenue), Medford
- Intersection 52 - Cambridge Street/I-93 Northbound Off-ramp, Boston
- Intersection 53 - Sullivan Square (Main Street/Maffa Way/Cambridge Street/Alford Street, Boston)
- **Harvard Street at Main Street, Medford**

The locations of the traffic count program may be adjusted as necessary to ensure that the geographic extent of the data collected is sufficient to measure the impact of the Project and to reflect changes in the transportation system that may occur after the completion of the Project.

The data collection at Sullivan Square (Intersection 53) will be reviewed and approved by the MGC and will be designed to determine the number of vehicle trips entering and leaving the intersection that are attributable to the Project during the Friday afternoon peak hour.

Parking

- Conducted once annually.
- Parking occupancy observations within the Project parking garage on a Thursday, Friday, and Saturday between 6:00 a.m. and 10:00 p.m.
- Employee parking demands at off-site parking facilities based on employee surveys.
- Bicycle parking demand observations for both outside and inside bicycle parking facilities.
- Occupancy information and utilization data for car/vanpool spaces, carsharing services, alternatively fueled vehicle spaces, and electric vehicle charging stations within the on-site parking garage.

Public Transportation

- Conducted once annually.

- Boarding and alighting information for the Premium Park and Ride service, water transportation service, tour buses, the patron Orange Line shuttle, the employee shuttle, and the neighborhood shuttle.
- Boarding and alighting information to be obtained from the MBTA for the following MBTA bus routes:
 - Route 99 (Malden Center – Wellington Station) – at the bus stops located on Broadway (Route 99) serving the Project Site;
 - **Route 90 (Davis Square – Wellington Station) – at Wellington Station;**
 - **Route 100 (Elm Street – Wellington Station) – at Wellington Station; and**
 - **Route 134 (North Woburn – Wellington Station) – at Wellington Station.**

Travel Mode

- Conducted once annually.
- Employee and patron survey of commuting modes.

The survey will differentiate between casino and non-casino patrons and employees, and will include information pertaining to primary trip purpose (i.e., shopping, hotel guest, casino, etc.), mode of transportation used, and vehicle occupancy (for persons arriving by private automobile).

2.7.2 SCHEDULE

Baseline traffic volume data and boarding/alighting information for the aforementioned MBTA services will be obtained prior to initial occupancy of the Project to be used as a control point from which to assess variations in demand that may be attributable to the Project. Thereafter, the data collection effort will be undertaken as specified above following initial occupancy of the Project to coincide with peak attendance levels at the resort in April/May/June, August, or December. The data collection effort will continue as specified for a ten-year period after Project completion.

2.7.3 REPORTING

The reporting structure will assist in assessing the Project's stated mode share goals of no more than 71% of casino patrons arriving by automobiles and no more than 41% of employees travelling to work via automobiles. The results of the post-development transportation monitoring and reporting program will be summarized in an annual report that will be provided to MassDOT and the MGC within 30 days after the completion of the data collection effort for the preceding study period. The report will be used to 1) evaluate the Project with respect to the projected and actual measured impact of the Project on the transportation infrastructure and 2)

allow for informed decisions with respect to additional measures (if any) that may need to be undertaken. The report will include the following information:

- Project occupancy (build-out) and employee and patron attendance levels.
- Measured trip characteristics of the Project including for automobiles, the Premium Park and Ride service, the water transportation service, tour buses, the patron Orange Line shuttle, the employee shuttle, and the neighborhood shuttle. Trip rates will be calculated for each mode of transportation and will be compared to the projected trip characteristics of the Project.
- Trip distribution patterns based on a review of both the traffic count data and patron survey information.
- ***The number of vehicle trips associated with the Project entering and leaving Sullivan Square during the Friday afternoon peak-hour.***
- Traffic operations analyses for the intersections and roadways included within the monitoring area.
- Parking occupancy data (vehicles and bicycles).
- Public transportation and water shuttle utilization.
- Occupancy and use data for car/vanpool, alternatively fueled vehicles, car-sharing and electric vehicle charging spaces.

If the results of the transportation monitoring and reporting program indicate that there are operational deficiencies at the monitored locations and any of the following conditions apply:

- 1) The measured traffic volumes for the Project exceed 110% of the projected values;
- 2) ***The volume of Project-related traffic entering and leaving Sullivan Square during the Friday evening peak hour exceeds the data used by the City of Boston as the basis for its issuance of any required permits necessary for the Sullivan Square mitigation plan (the "Boston Permit Vehicle Trip Data"); or***
- 3) 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.

Then the Proponent will undertake corrective measures in conjunction with the appropriate parties and subject to receipt of all necessary rights permits and approvals. These measures will be identified in the annual report and may include without limitation:

- Retiming of traffic control signals;
- Optimizing traffic signal coordination;
- Enhancing the Transportation Demand Management (TDM) program using additional measures and incentives to encourage further use of alternatives to single occupancy vehicle travel;
- Increasing the amount of bicycle parking;
- Expanding the number of electric vehicle charging stations, car/vanpool parking spaces and parking for car sharing services and alternatively fueled vehicles, if demand equals or exceeds the supply provided;
- Providing additional on-site amenities to encourage public transportation and charter bus services;
- Expanding the local and regional shuttle program for employees and patrons to include service to additional remote parking facilities;
- ***Remittance of a Traffic Reduction Incentive Payment as defined by the MGC for each additional Project-related vehicle trip entering and leaving Sullivan Square during the Friday afternoon peak-hour in excess of the Boston Permit Vehicle Trip Data (required if exceedance is identified); and***
- ***Evaluating parking pricing strategies within the Project Site to encourage use of public transportation and/or off-peak visitation.***

The identified corrective measures, if any, will be documented in the transportation monitoring and reporting program report, which will be submitted to MassDOT and the MGC within 30 days after the first anniversary of the opening of the Project, and annually thereafter, and which will identify the appropriate parties responsible for implementation, required approvals, and the timeline for implementation. The status of implementation of any such identified improvement measure will be documented in the subsequent monitoring report.



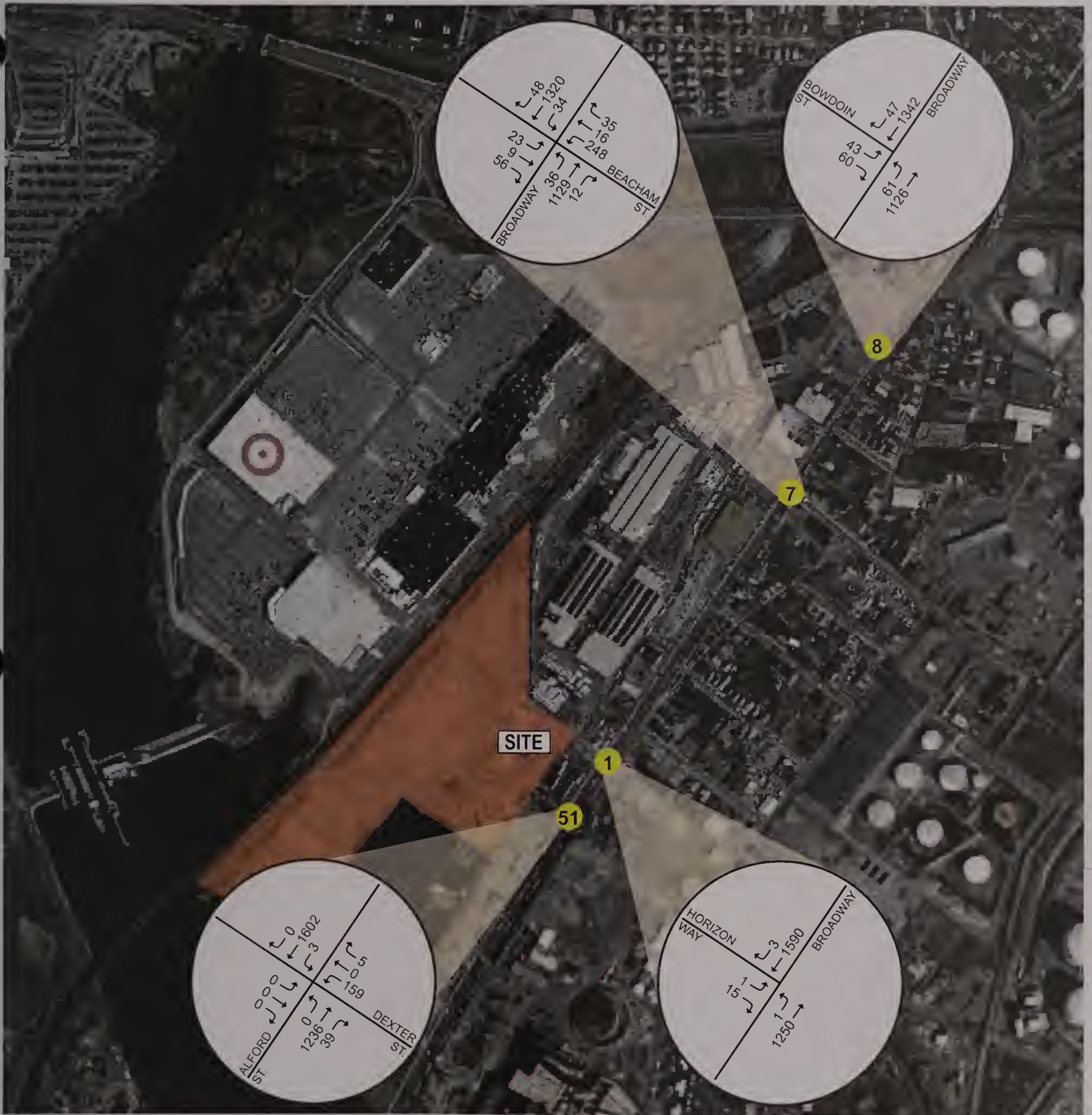
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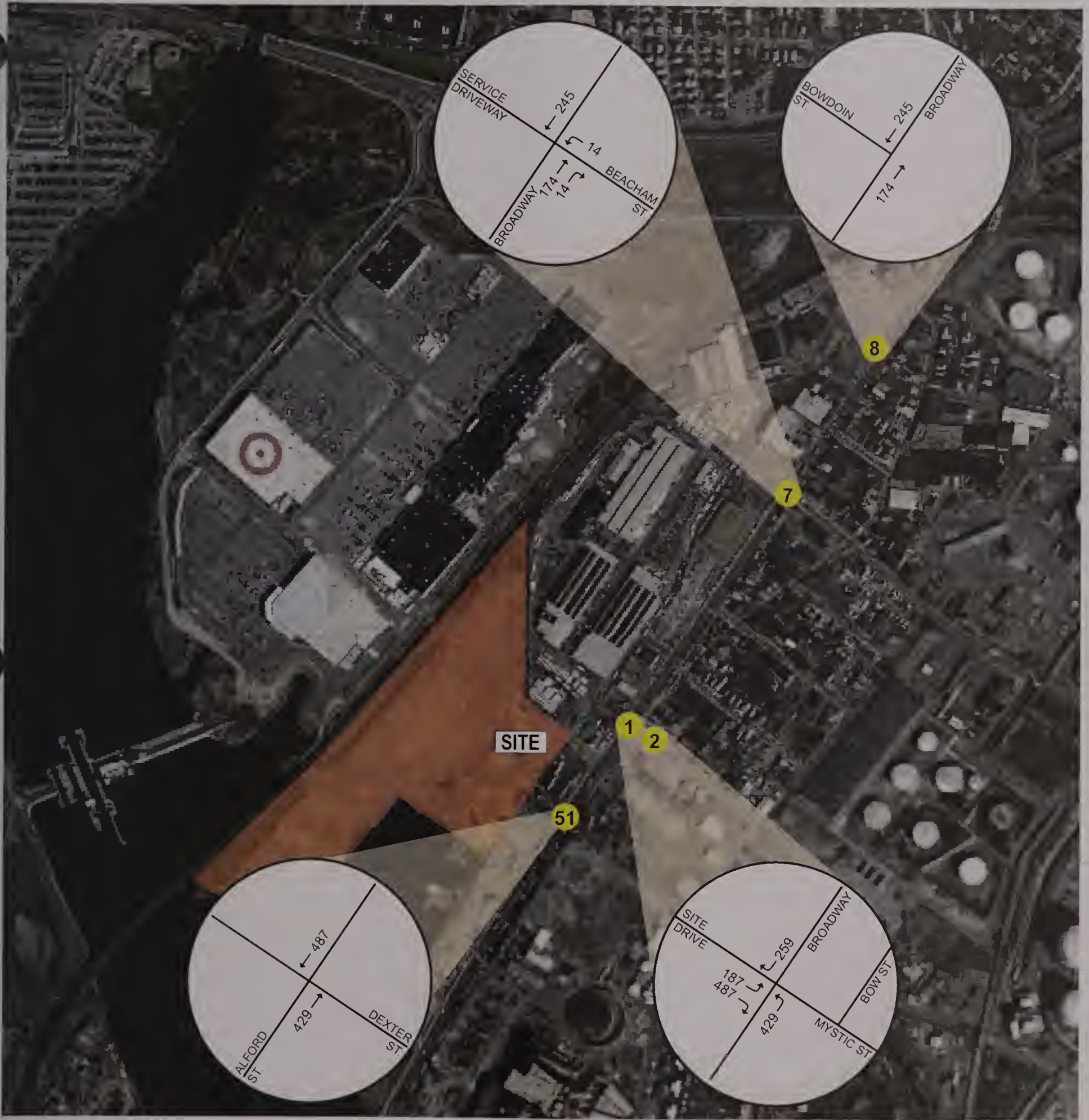
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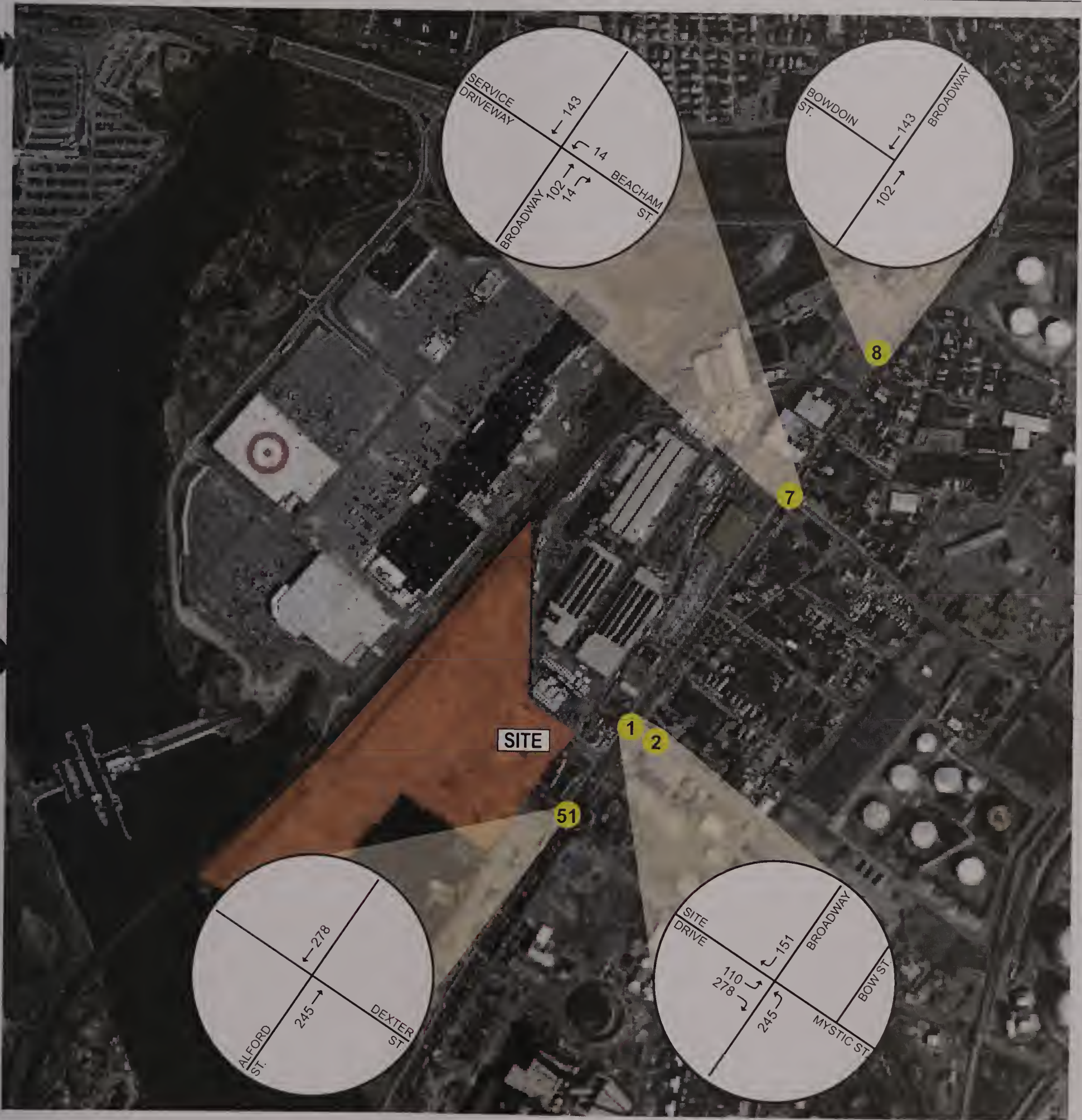
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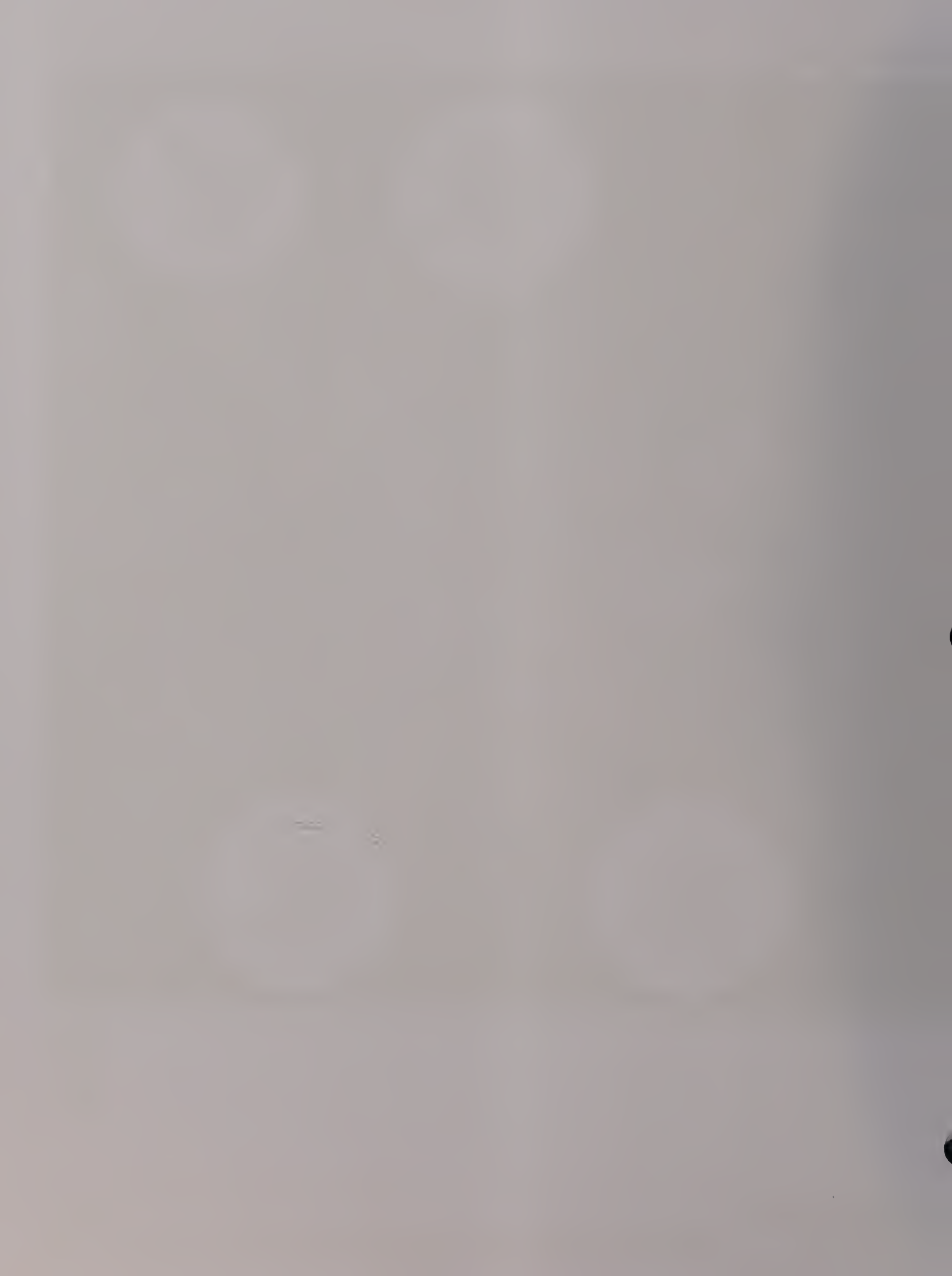
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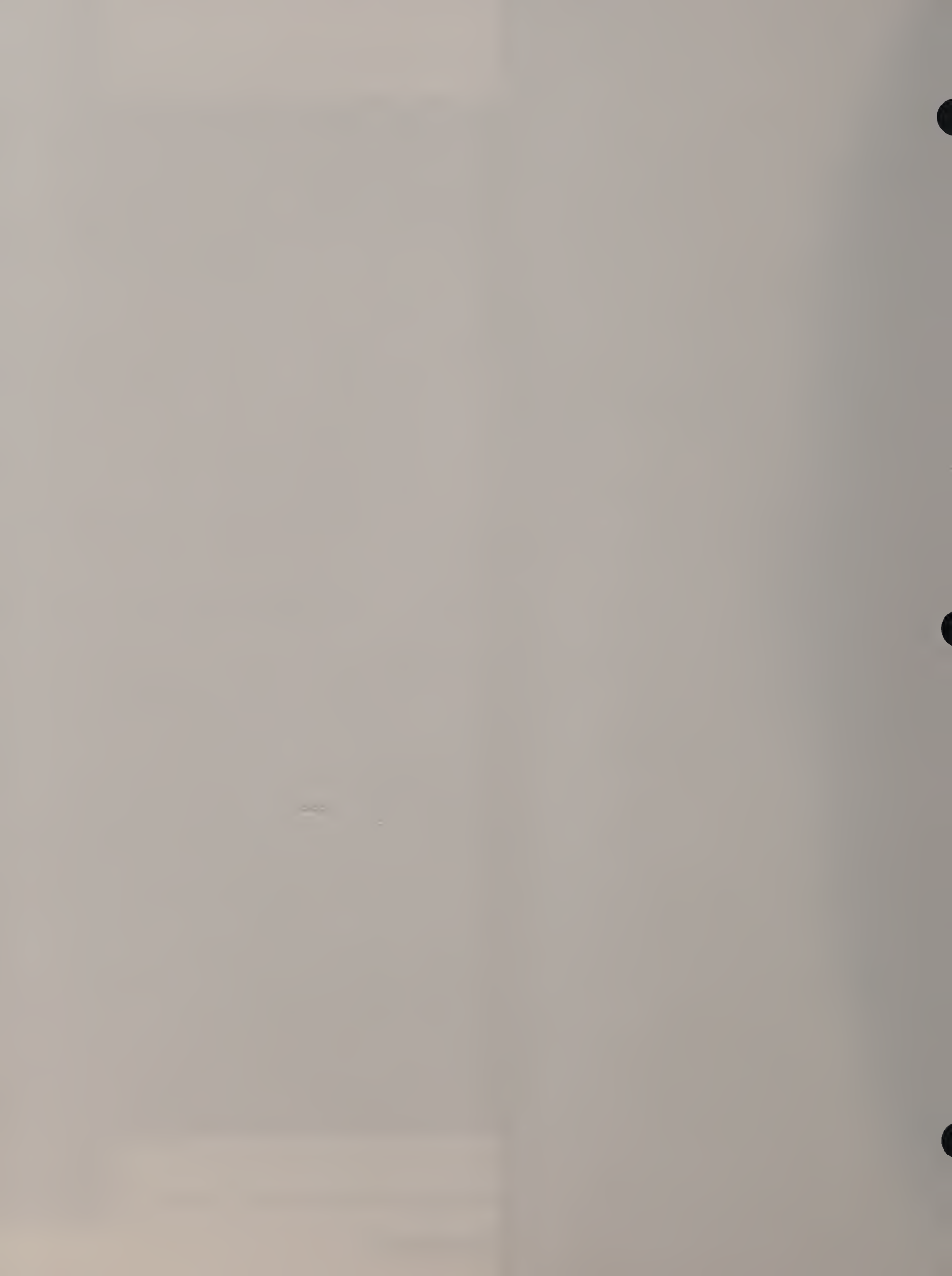


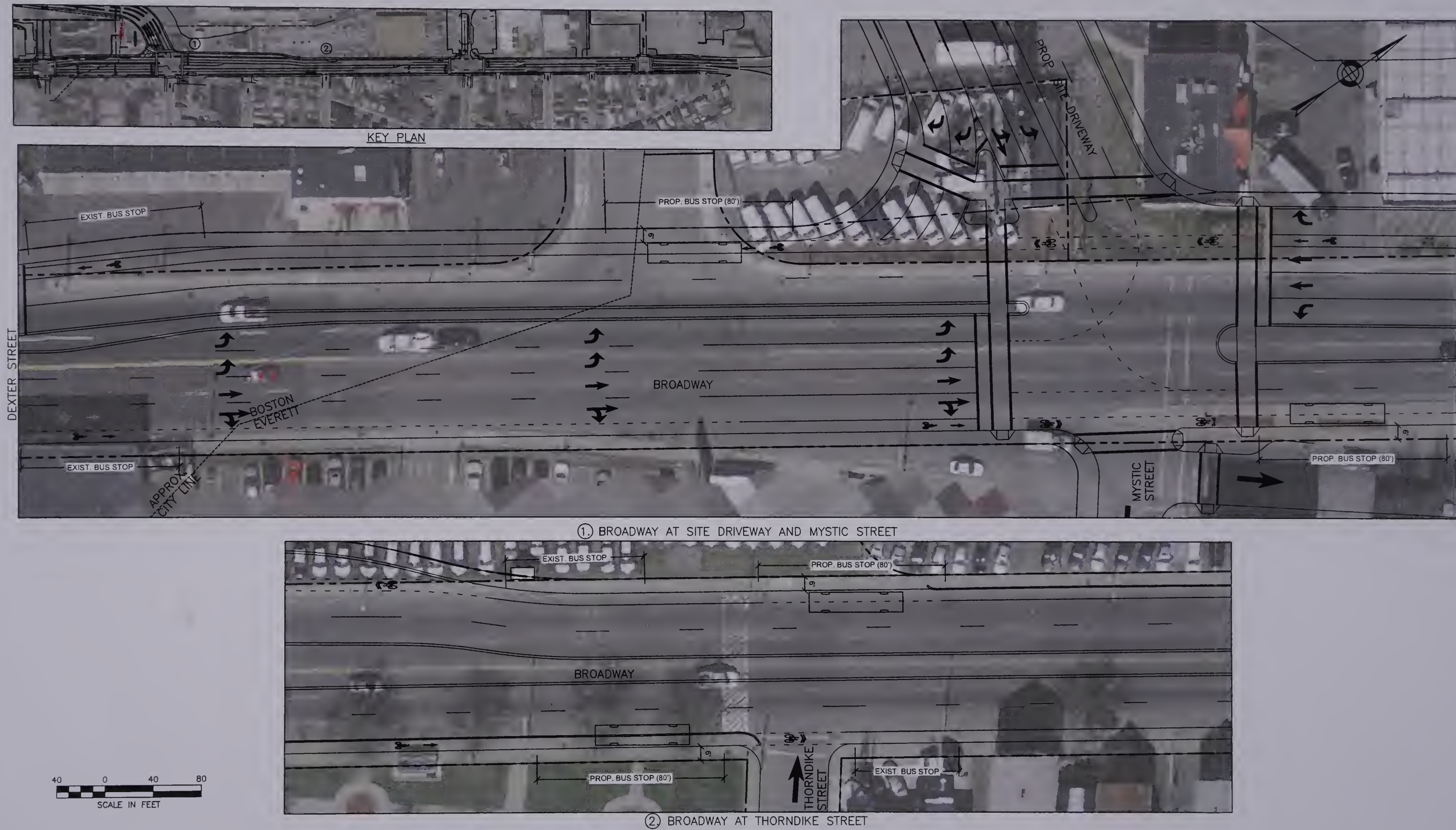


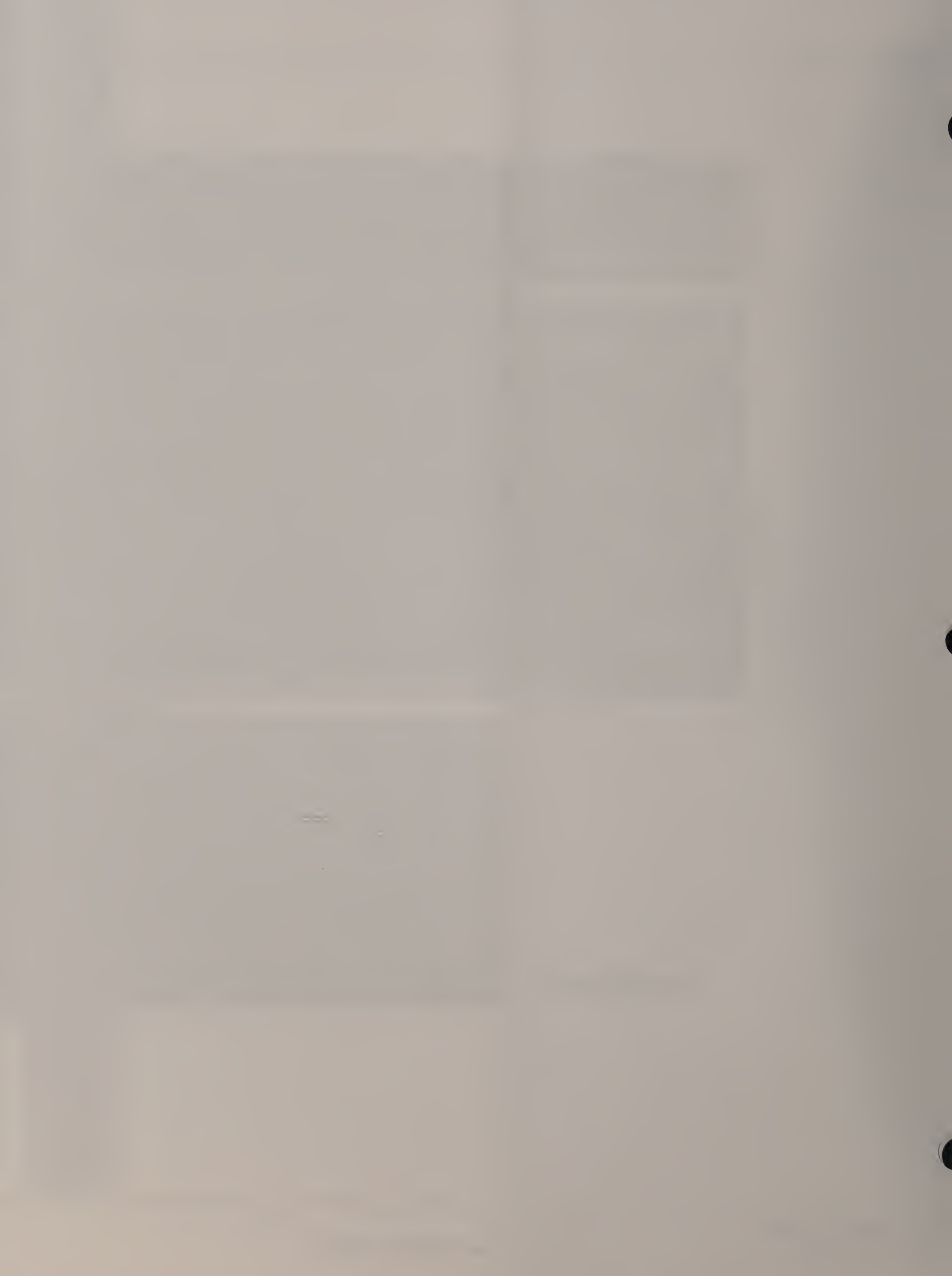
Figure 2-12C

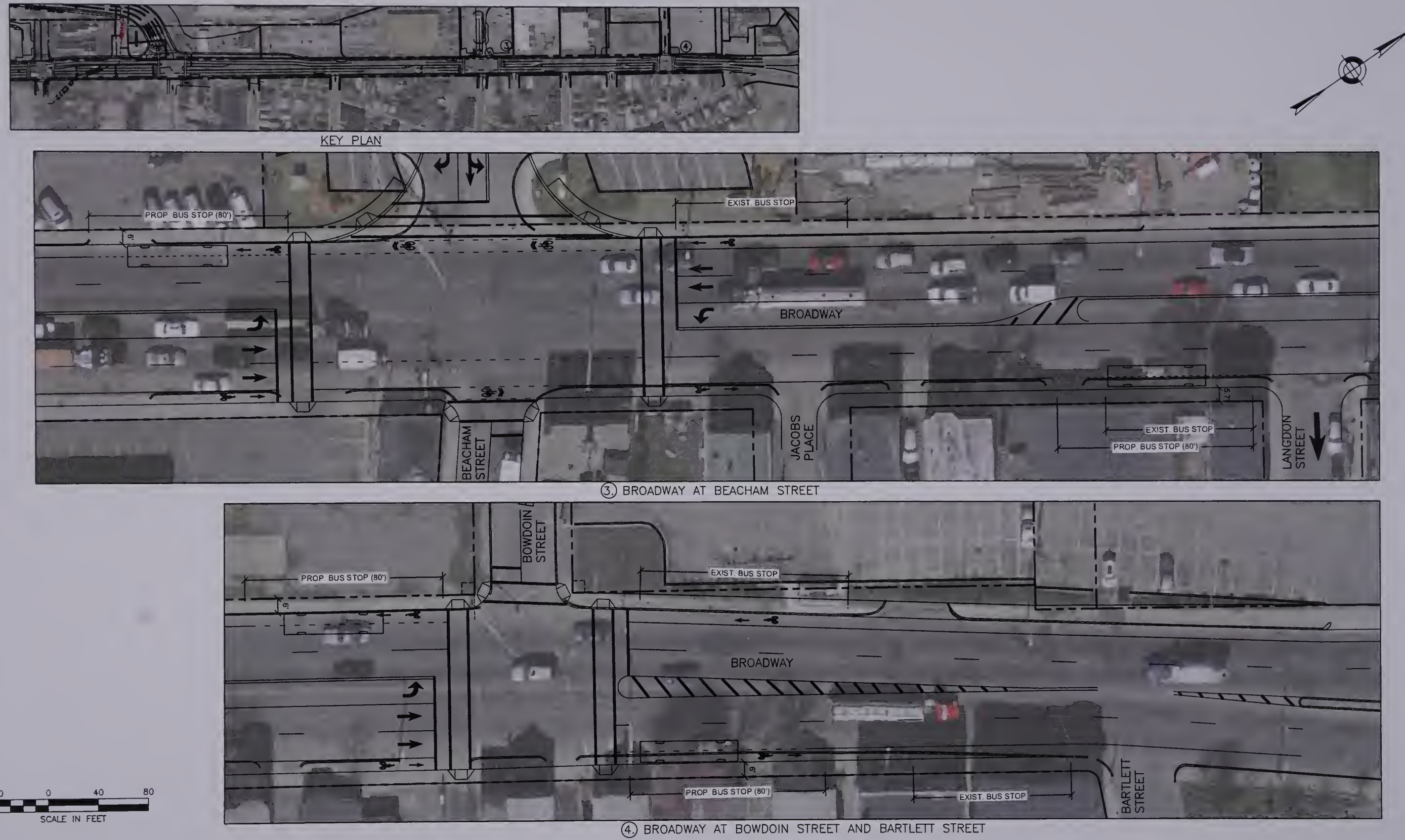
Lower Broadway/Alford Street (Route 99) Improvement Plan (80-scale)

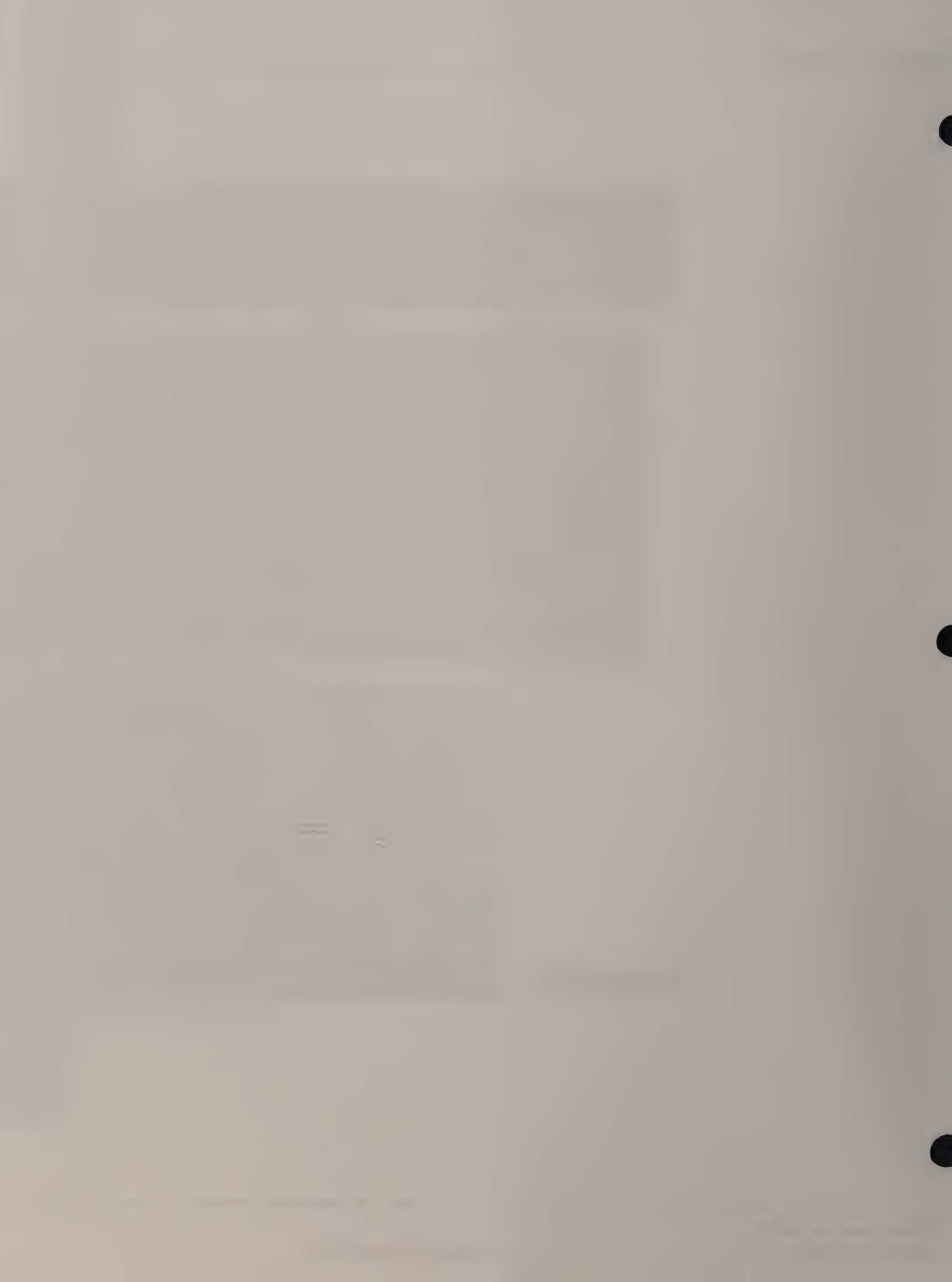
Source: Howard/Stein-Hudson Associates, Inc., 2014

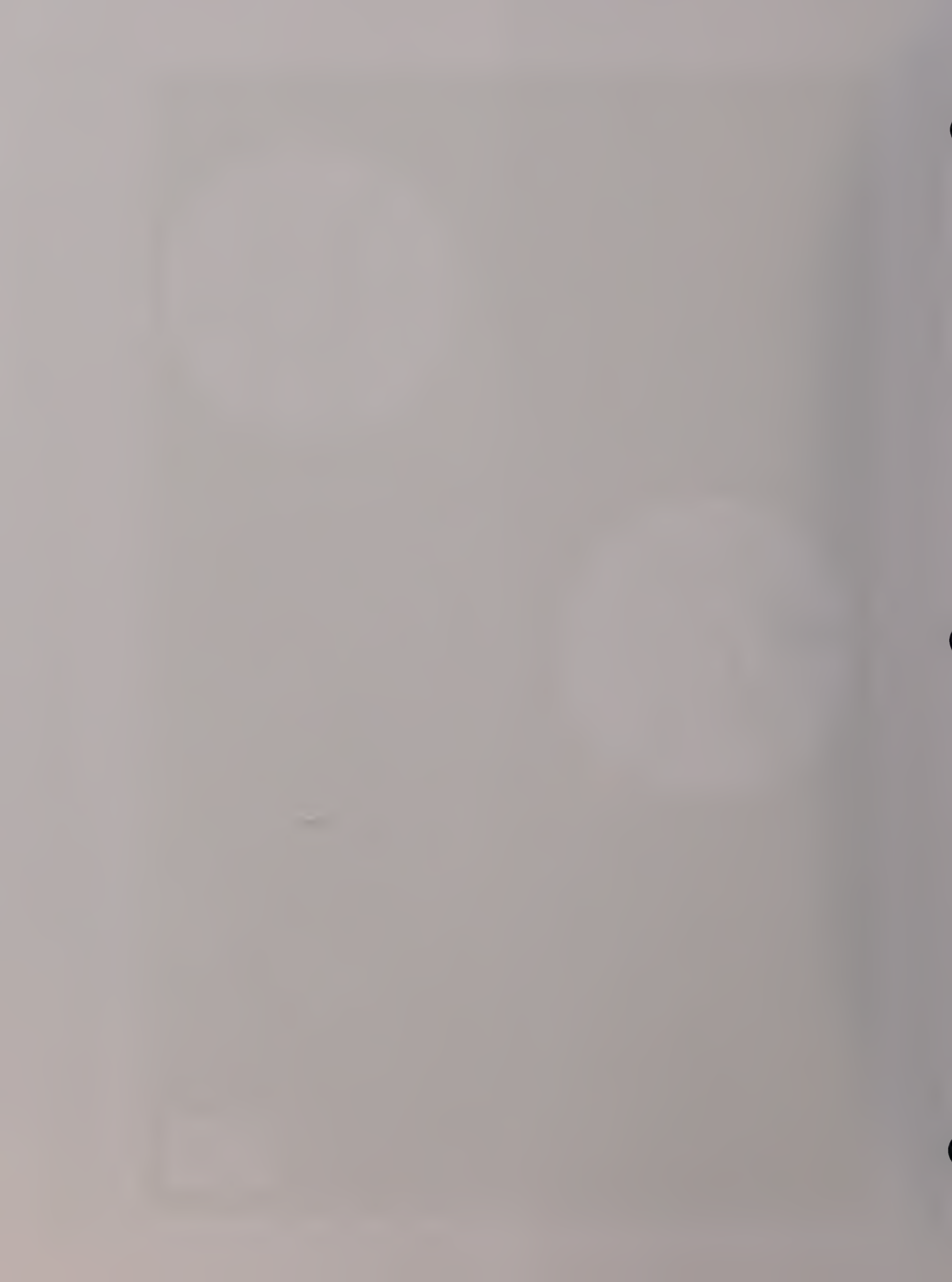








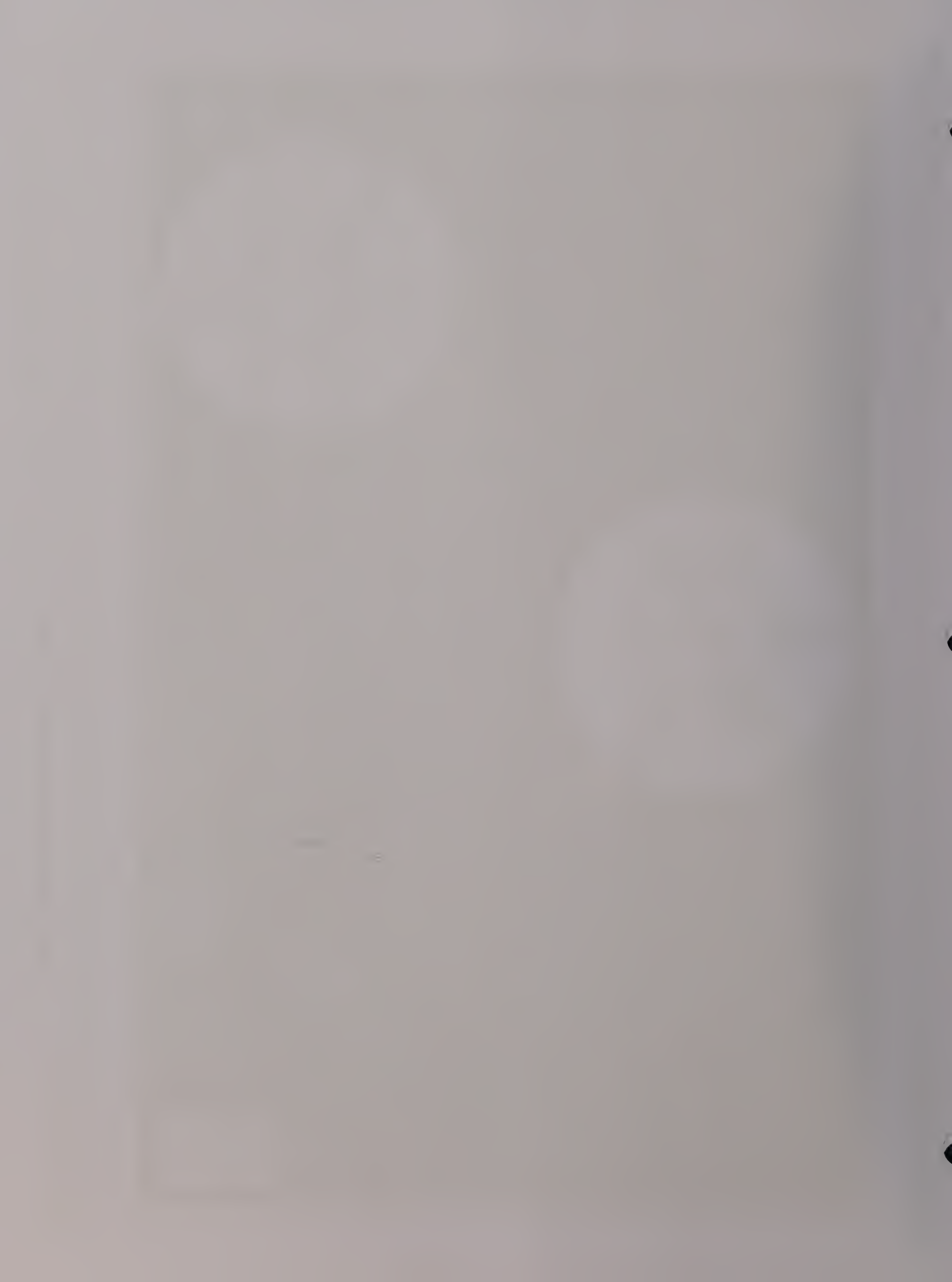






Wynn Resort in Everett
Everett, Massachusetts

Figure 2-15
Existing (2013) Saturday Afternoon Peak Hour (2:45-3:45 p.m.) Traffic Volumes, Santilli and Sweetser Circles, Everett
Source: Howard/Stein-Hudson Associates, Inc., 2015

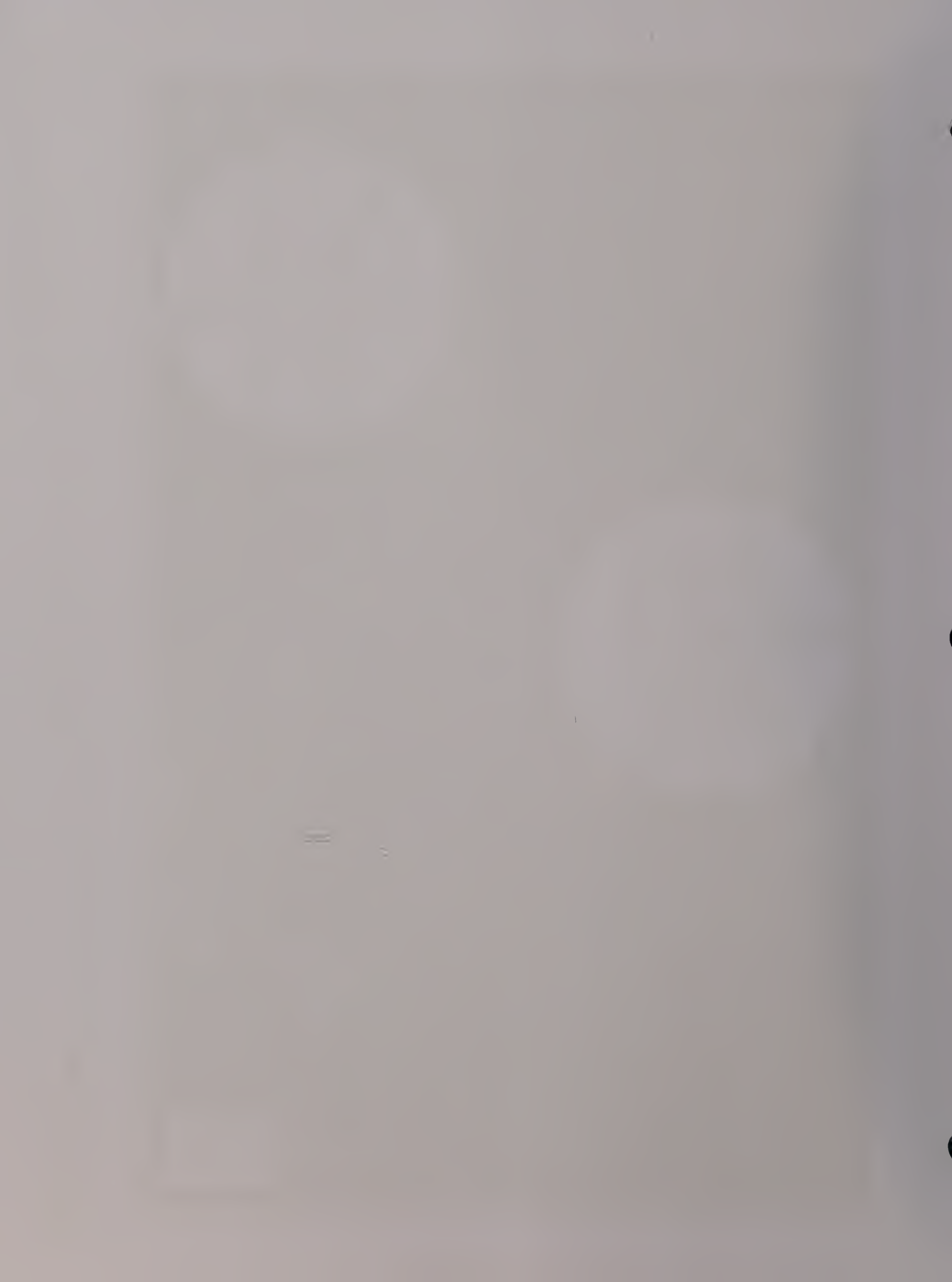


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Wynn Resort in Everett
Everett, Massachusetts

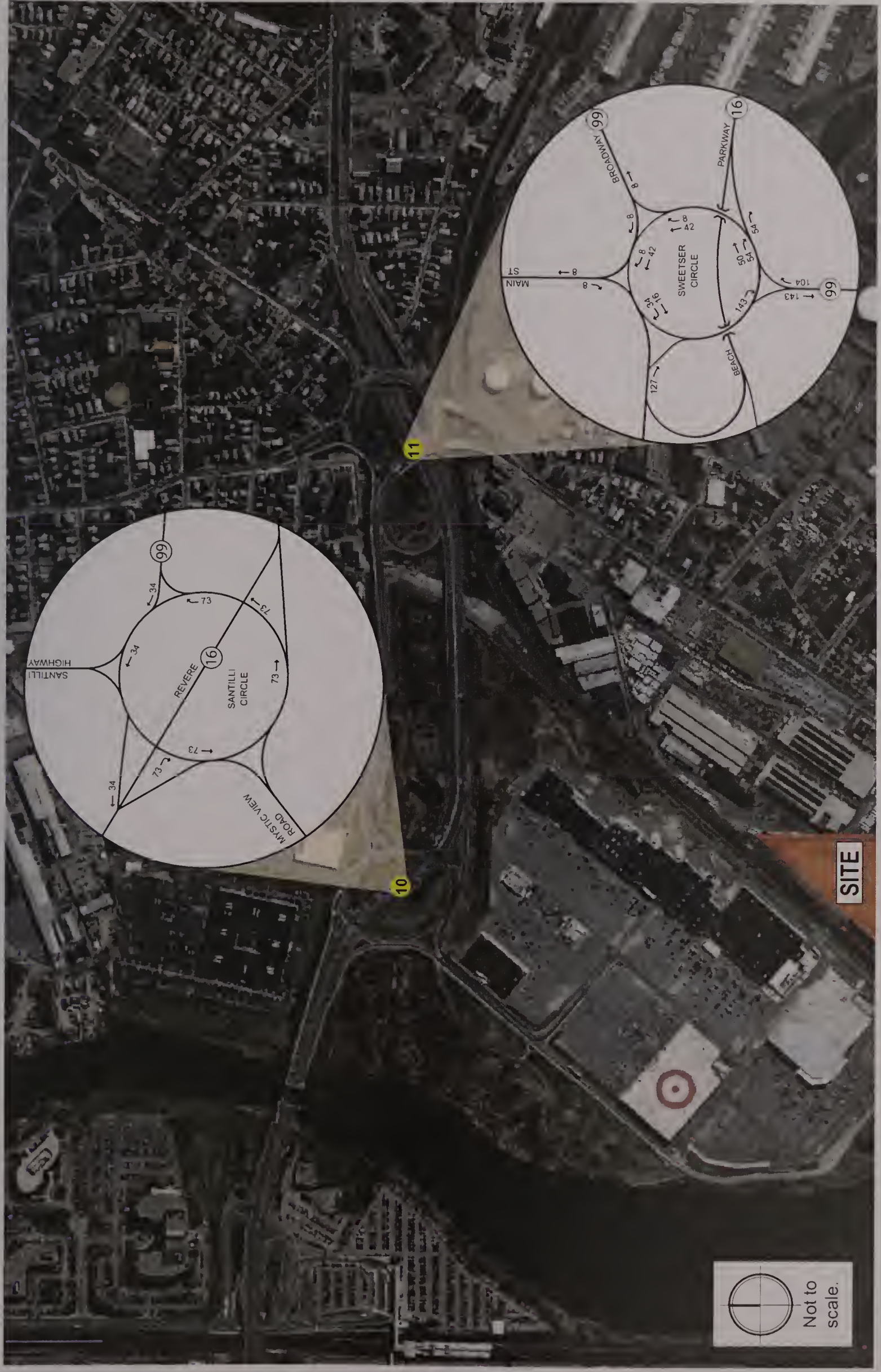
Figure 2-18
Friday p.m. Peak Hour Project-generated Trips, Santilli and Sweetser Circles, Everett
Source: Howard/Stein-Hudson Associates, Inc., 2015





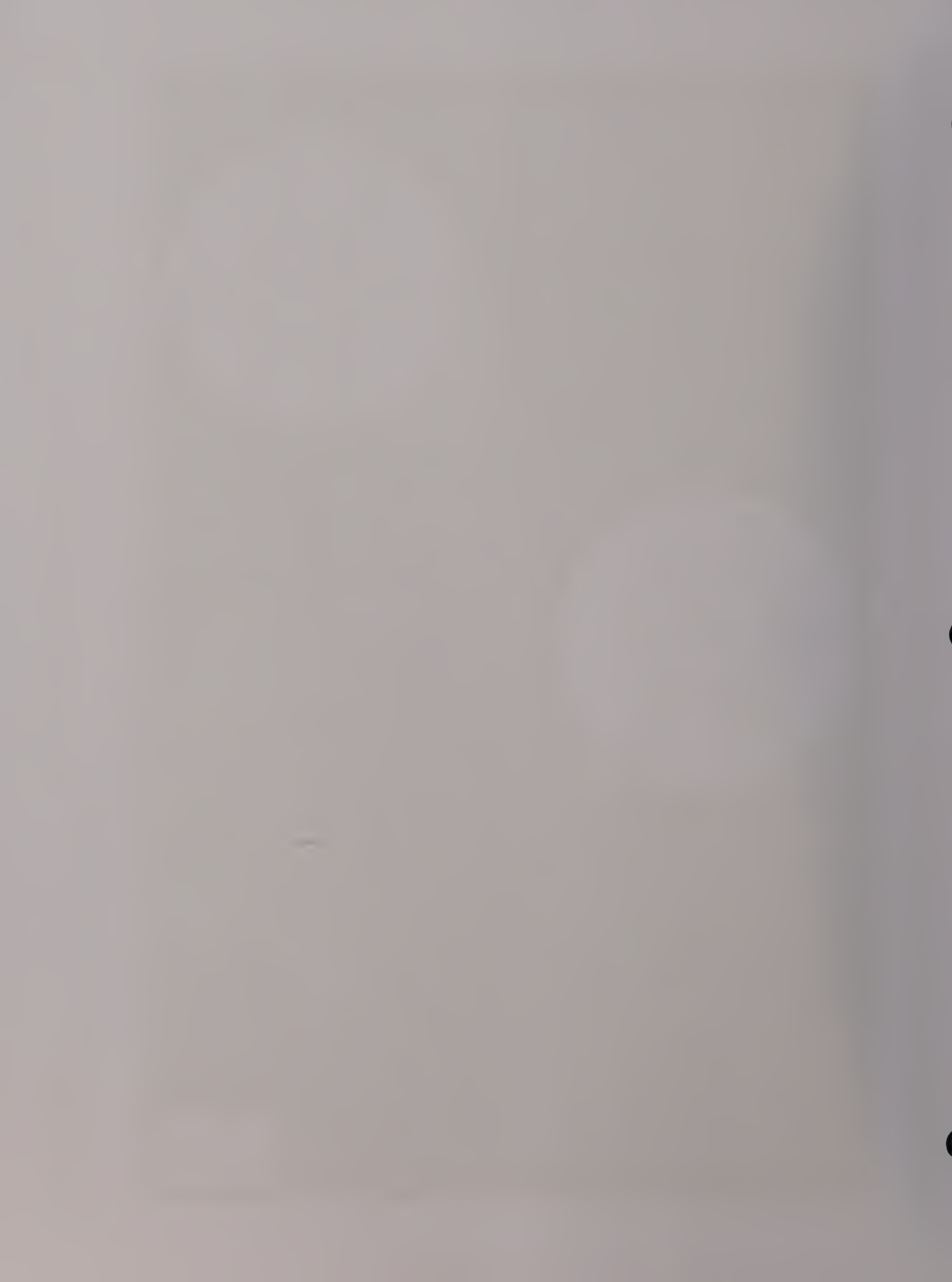
Wynn Resort in Everett
Everett, Massachusetts

Figure 2-19
Saturday Afternoon Peak Hour Project-generated Trips, Santilli and Sweetser Circles, Everett
Source: Howard/Stein-Hudson Associates, Inc., 2015



Wynn Resort in Everett
Everett, Massachusetts

Figure 2-20
Friday p.m. "Real" Peak Hour Project-generated Trips, Santilli and Sweetser Circles, Everett
Source: Howard/Stein-Hudson Associates, Inc., 2015





Wynn Resort in Everett
Everett, Massachusetts

Figure 2-22
Build (2023) Saturday Afternoon Peak Hour Traffic Volumes, Santilli and Sweetser Circles, Everett
Source: Howard/Stein-Hudson Associates, Inc., 2015



Wynn Resort in Everett
Everett, Massachusetts

Figure 2-23
Build (2023) Friday p.m. "Real" Peak Hour Traffic Volumes, Santilli and Sweetser Circles, Everett
Source: Howard/Stein-Hudson Associates, Inc., 2015



*SEE 80 SCALE PLANS FOR DIMENSIONS

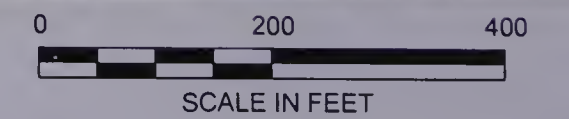




FIGURE 2-24B
FIGURE 2-24C

*ALL LANE WIDTHS ARE 11' UNLESS OTHERWISE NOTED

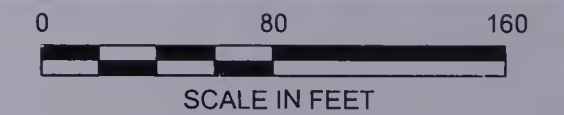
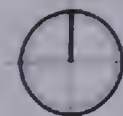






FIGURE 2-24B
FIGURE 2-24C

FIGURE 2-24B
FIGURE 2-24D

FIGURE 2-24C
FIGURE 2-24D

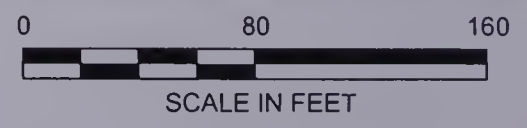
RECONSTRUCT ISLAND

MYSTIC VIEW ROAD

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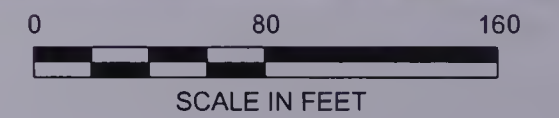
(ROUTE 16)

*ALL LANE WIDTHS ARE 11' UNLESS OTHERWISE NOTED





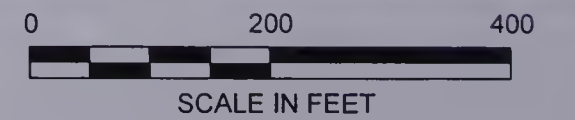
*ALL LANE WIDTHS ARE 11' UNLESS OTHERWISE NOTED







*ALL LANE WIDTHS ARE 12' UNLESS OTHERWISE NOTED



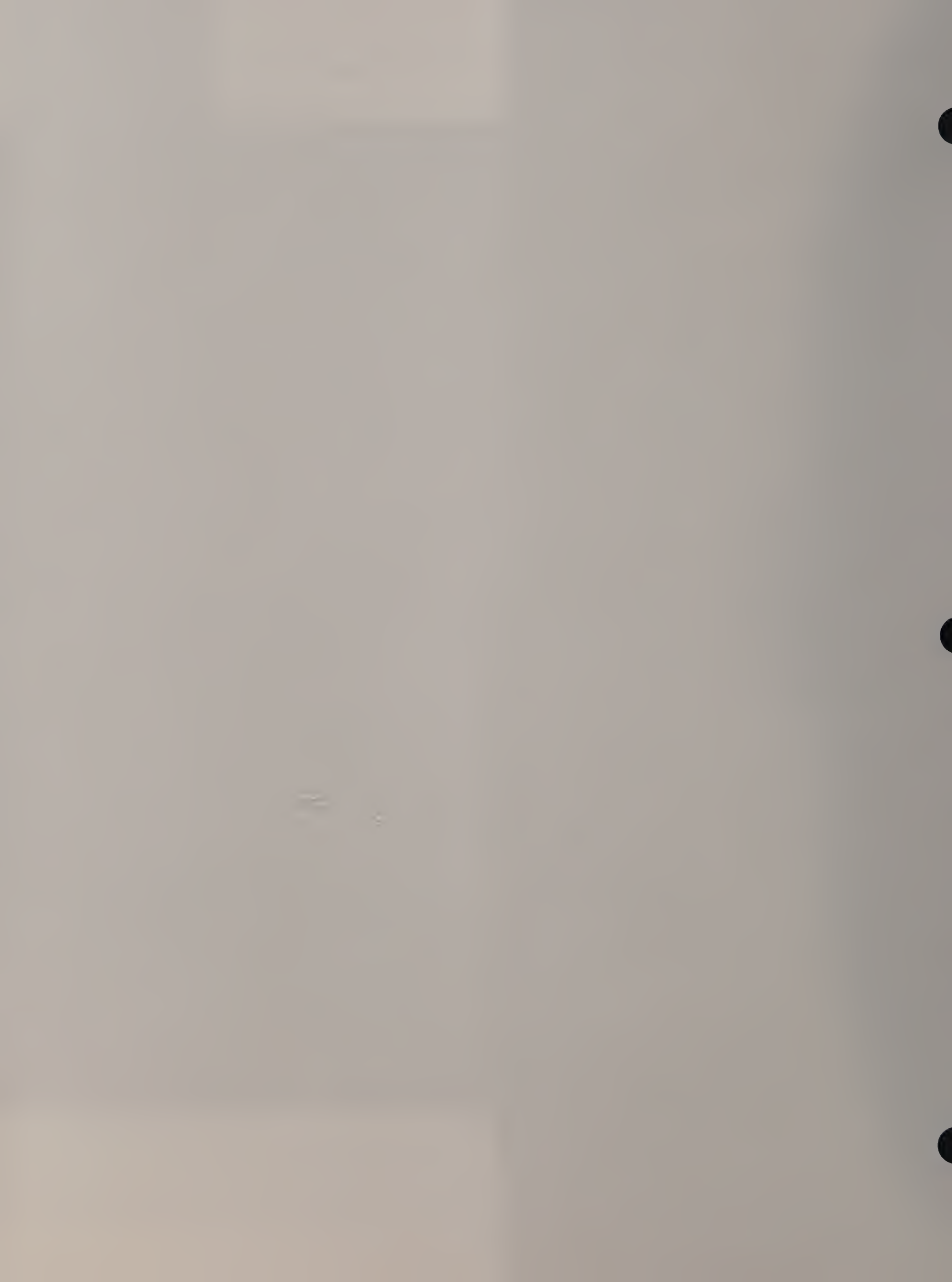




FIGURE 2-25B
FIGURE 2-25C

FIGURE 2-25B
FIGURE 2-25C

*ALL LANE WIDTHS ARE 12' UNLESS OTHERWISE NOTED

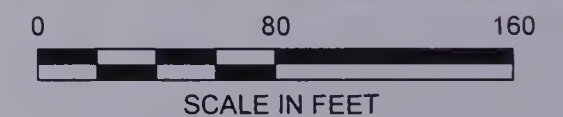


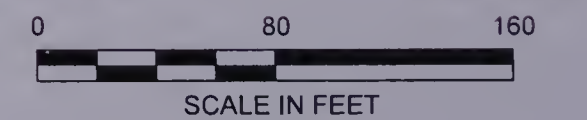


FIGURE 2-25B
FIGURE 2-25C

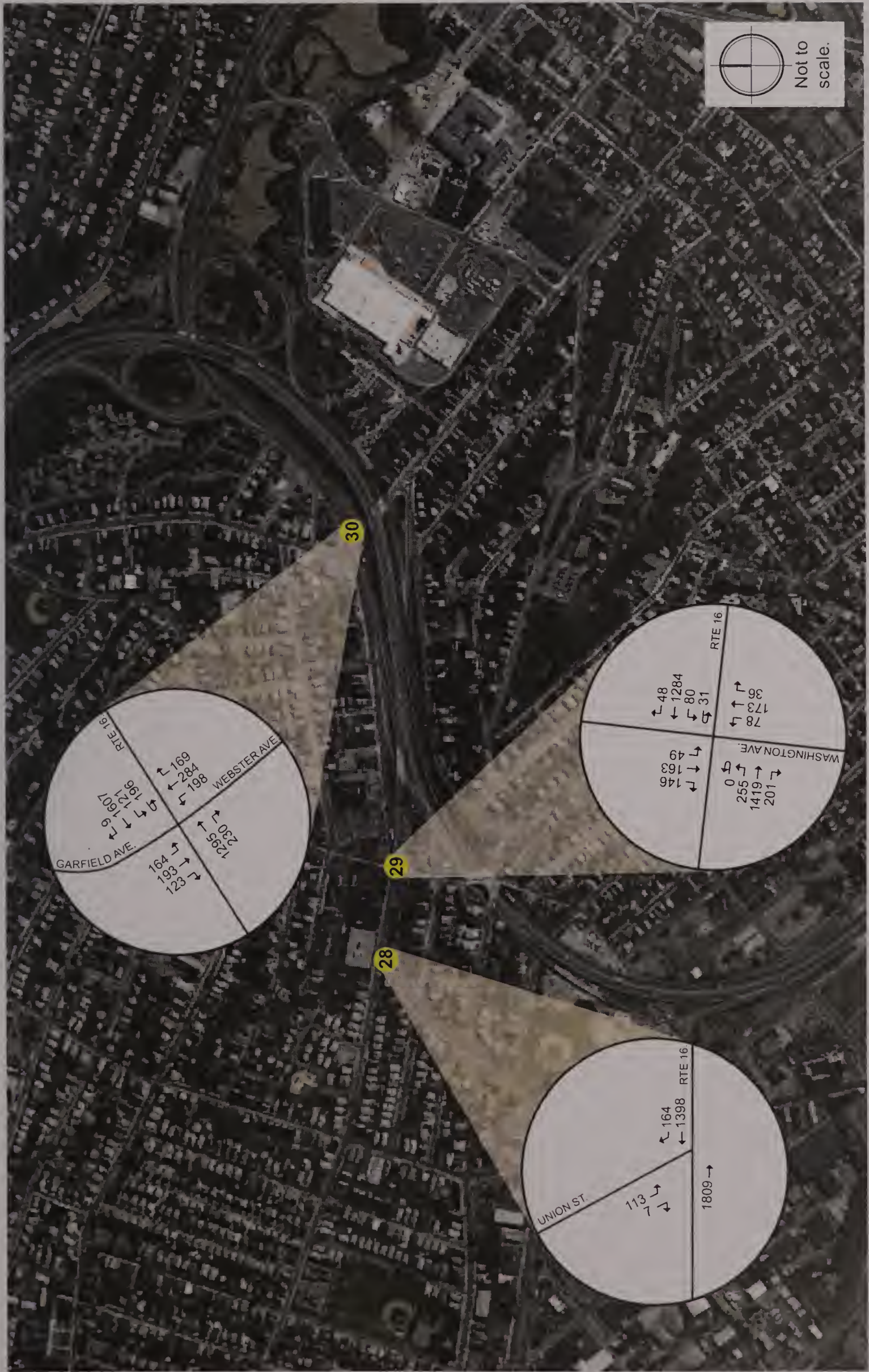
FIGURE 2-25B
FIGURE 2-25C



*ALL LANE WIDTHS ARE 12' UNLESS OTHERWISE NOTED

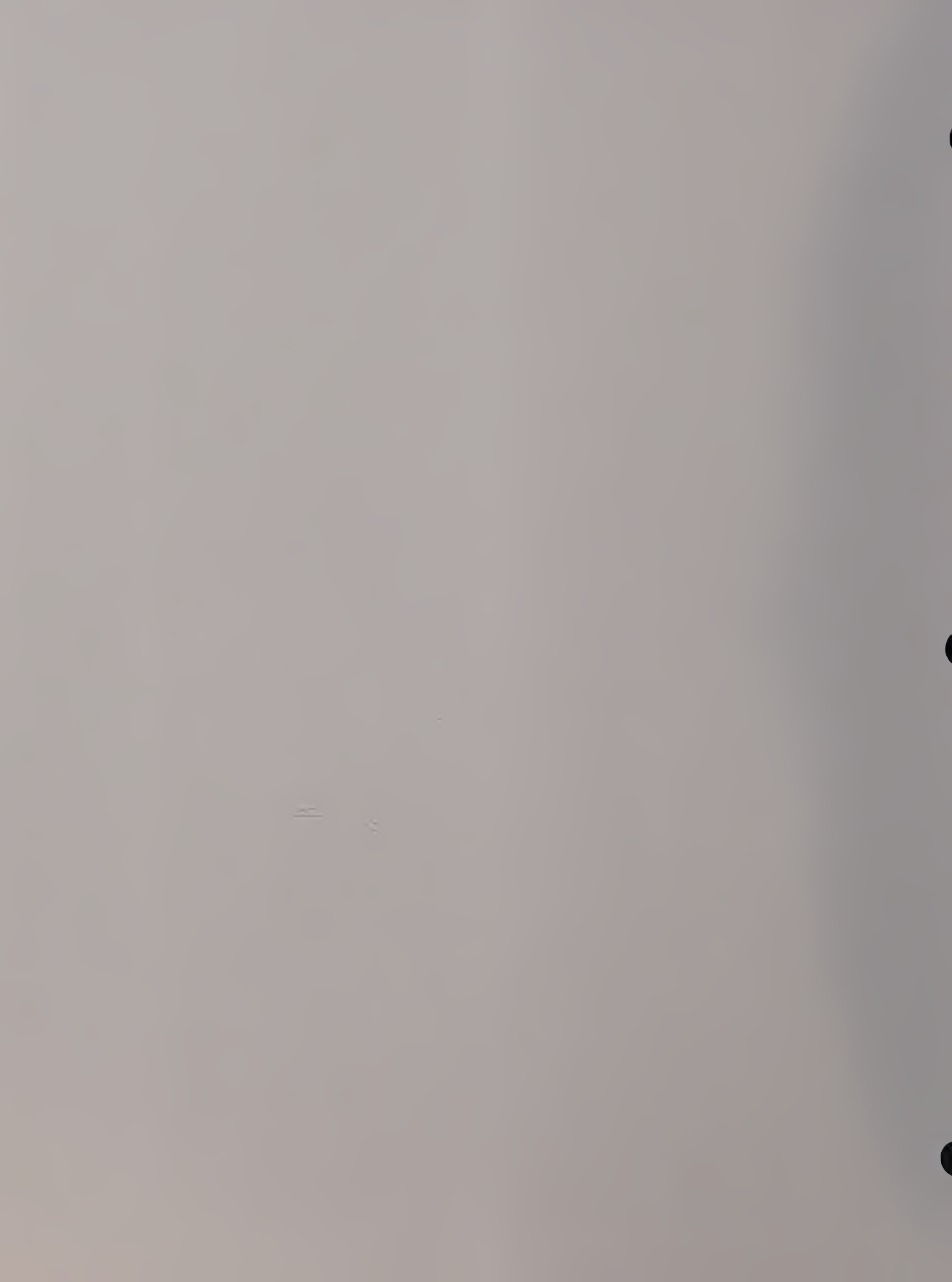






Wynn Resort in Everett
Everett, Massachusetts

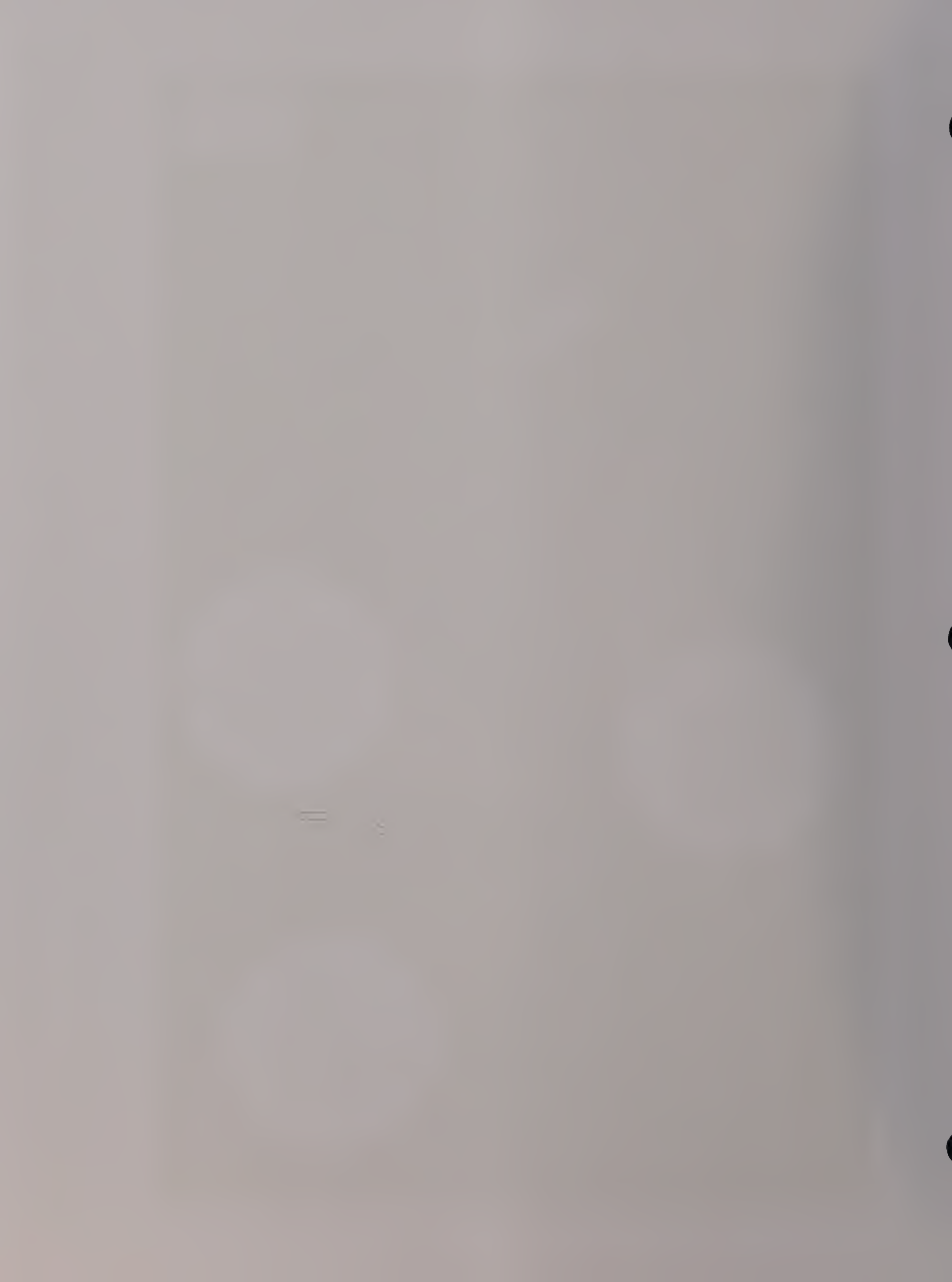
Figure 2-26
Existing (2013) Friday p.m. Peak Hour (4:30-5:30 p.m.) Traffic Volumes, Route 16, Chelsea
Source: Howard/Stein-Hudson Associates, Inc., 2015





Wynn Resort in Everett
Everett, Massachusetts

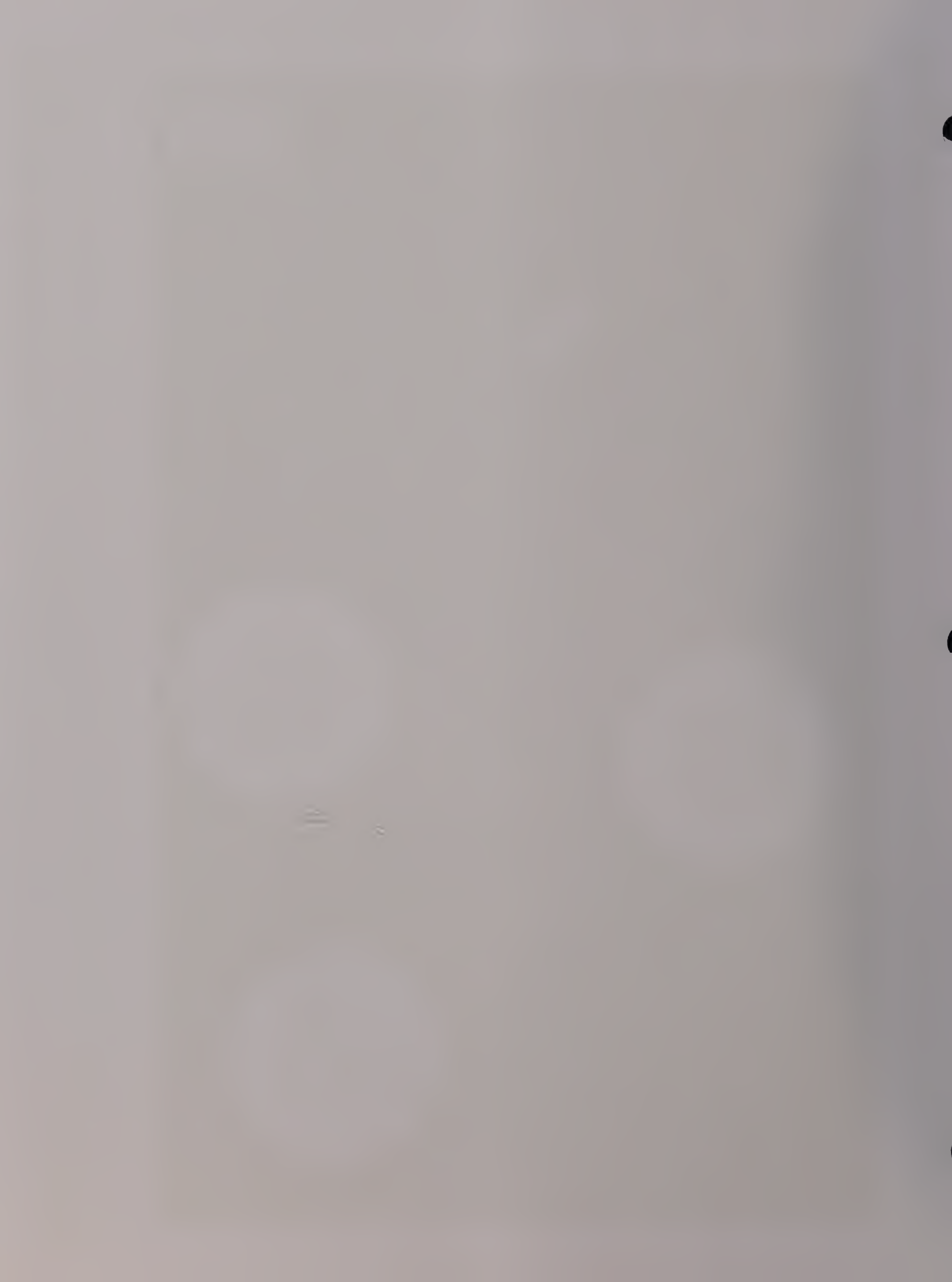
Figure 2-27
Existing (2013) Saturday Afternoon Peak Hour (2:45-3:45 p.m.) Traffic Volumes, Route 16, Chelsea
Source: Howard/Stein-Hudson Associates, Inc., 2015





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Everett, Massachusetts

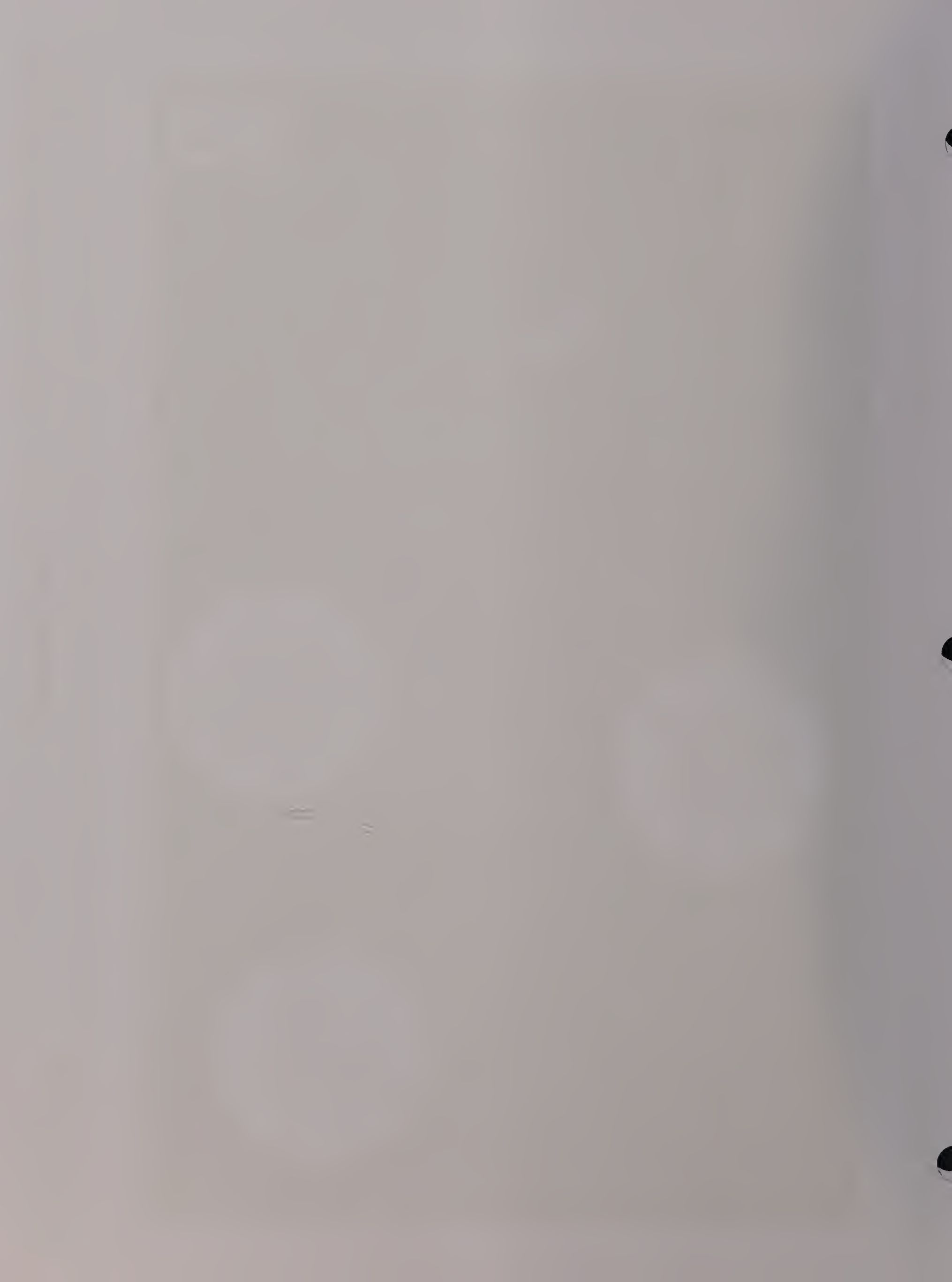
Figure 2-28
No Build (2023) Friday p.m. Peak Hour Traffic Volumes, Route 16, Chelsea
Source: Howard/Stein-Hudson Associates, Inc., 2015





Wynn Resort in Everett
Everett, Massachusetts

Figure 2-29
No Build (2023) Saturday Afternoon Peak Hour Traffic Volumes, Route 16, Chelsea
Source: Howard/Stein-Hudson Associates, Inc., 2015





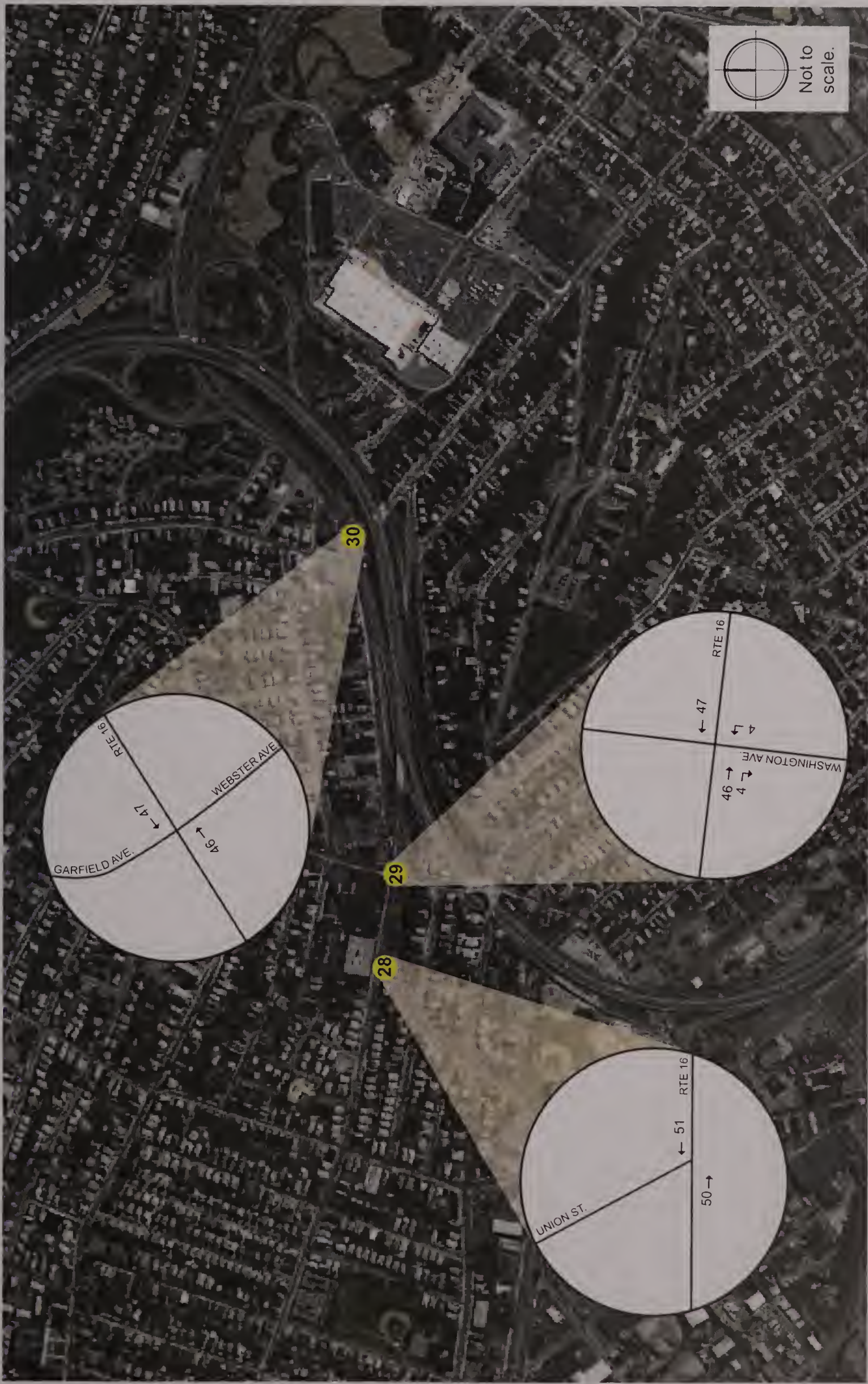
Wynn Resort in Everett
Everett, Massachusetts

Figure 2-30
Friday p.m. Peak Hour Project-generated Trips, Route 16, Chelsea
Source: Howard/Stein-Hudson Associates, Inc., 2015



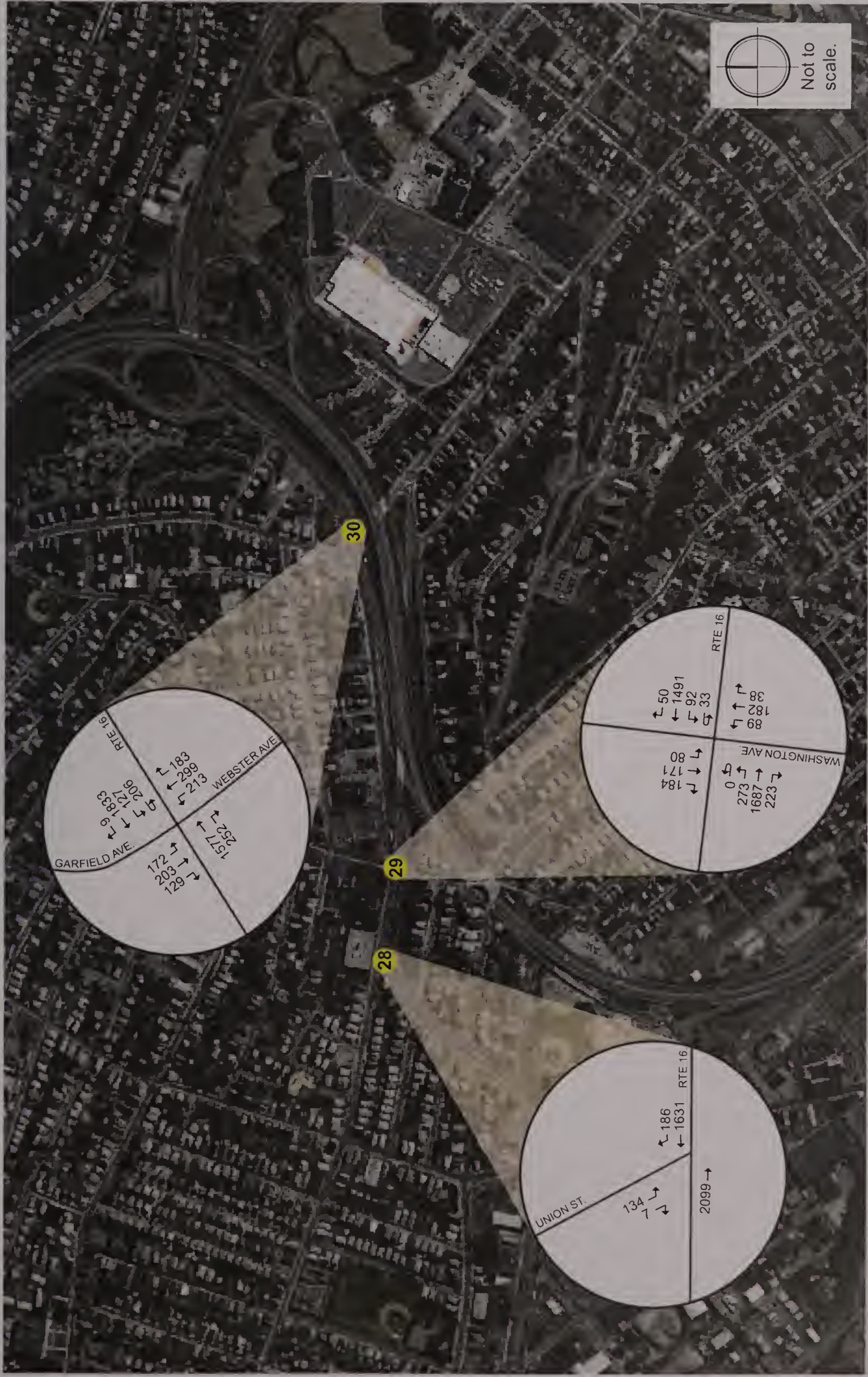
Wynn Resort in Everett
Everett, Massachusetts

Figure 2-31
Saturday Afternoon Peak Hour Project-generated Trips, Route 16, Chelsea
Source: Howard/Stein-Hudson Associates, Inc., 2015



Wynn Resort in Everett
Everett, Massachusetts

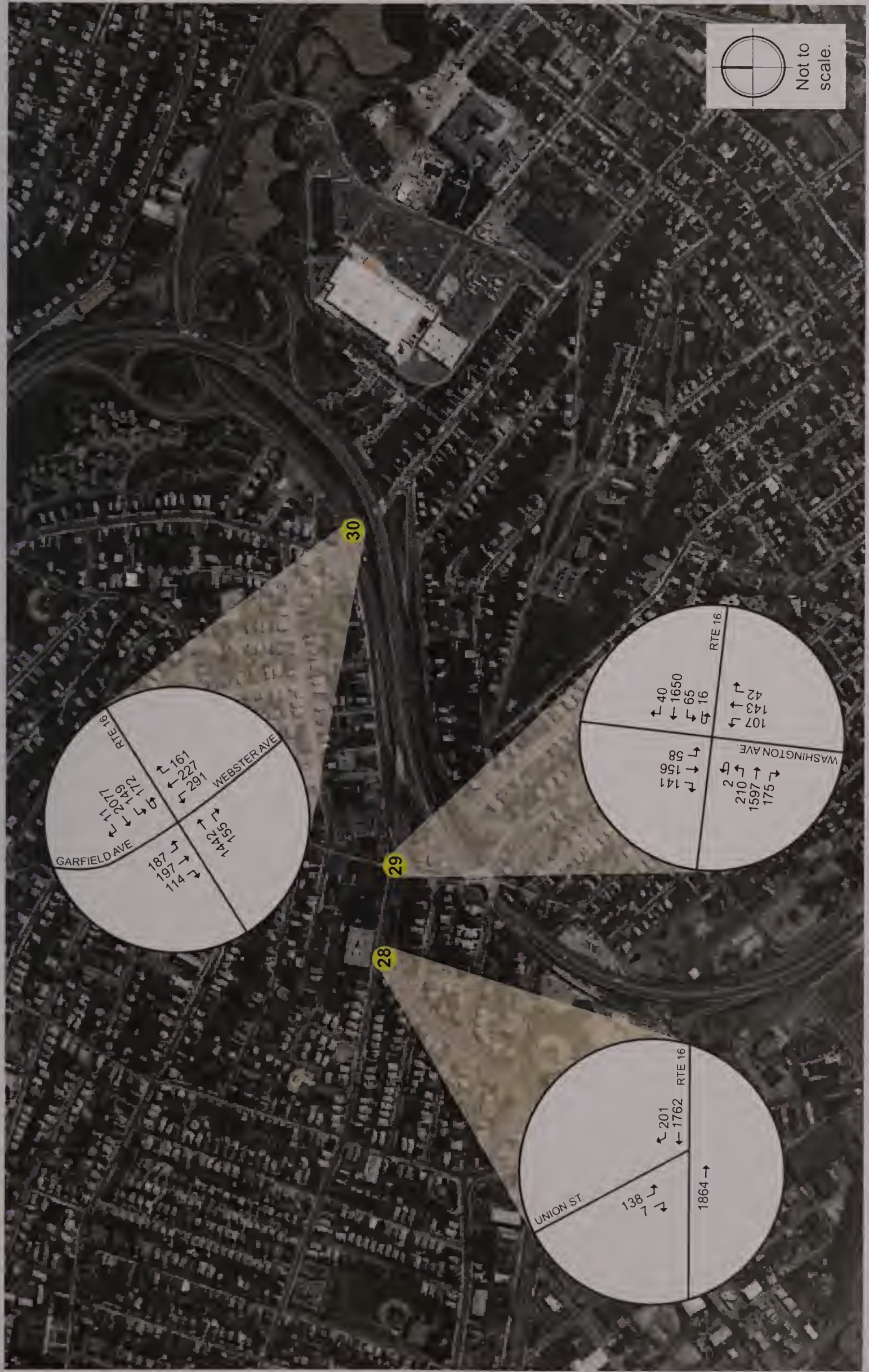
Figure 2-32
Friday p.m. "Real" Peak Hour Project-generated Trips, Route 16, Chelsea
Source: Howard/Stein-Hudson Associates, Inc., 2015



Wynn Resort in Everett
Everett, Massachusetts

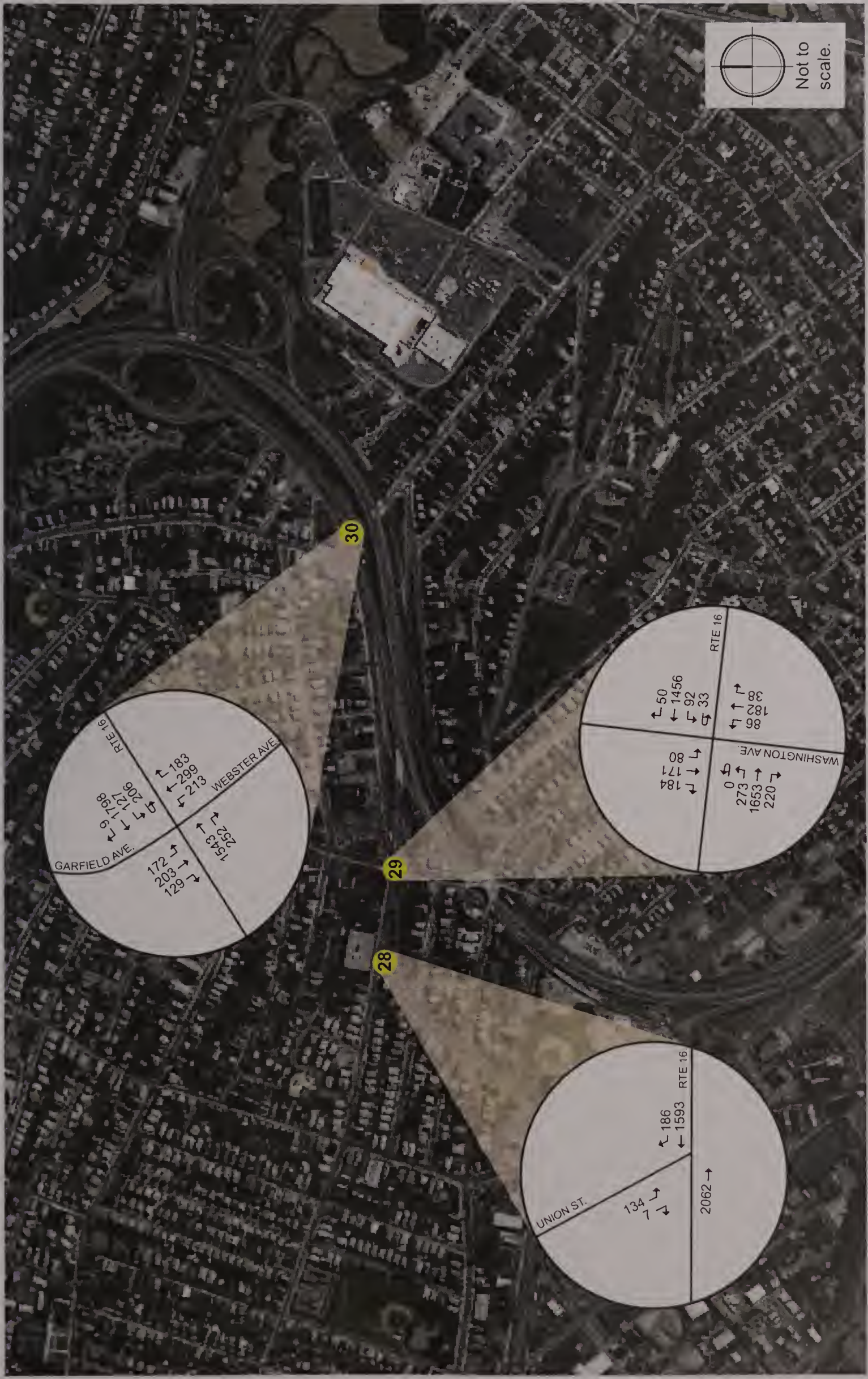
Figure 2-33
Build (2023) Friday p.m. Peak Hour Traffic Volumes, Route 16, Chelsea
Source: Howard/Stein-Hudson Associates, Inc., 2015





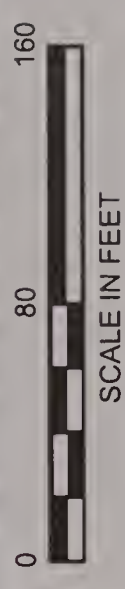
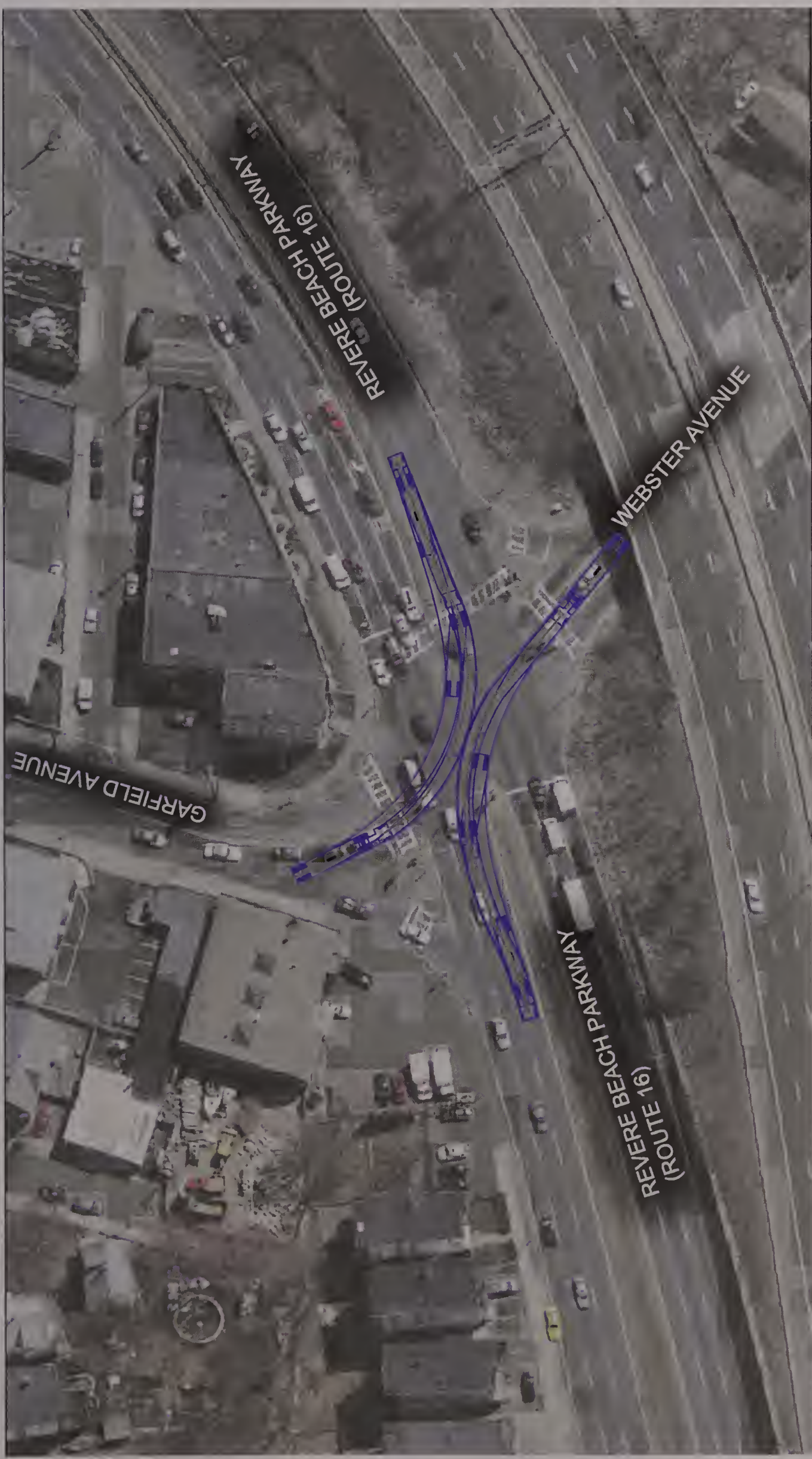
Wynn Resort in Everett
Everett, Massachusetts

Figure 2-34
Build (2023) Saturday Afternoon Peak Hour Traffic Volumes, Route 16, Chelsea
Source: Howard/Stein-Hudson Associates, Inc., 2015



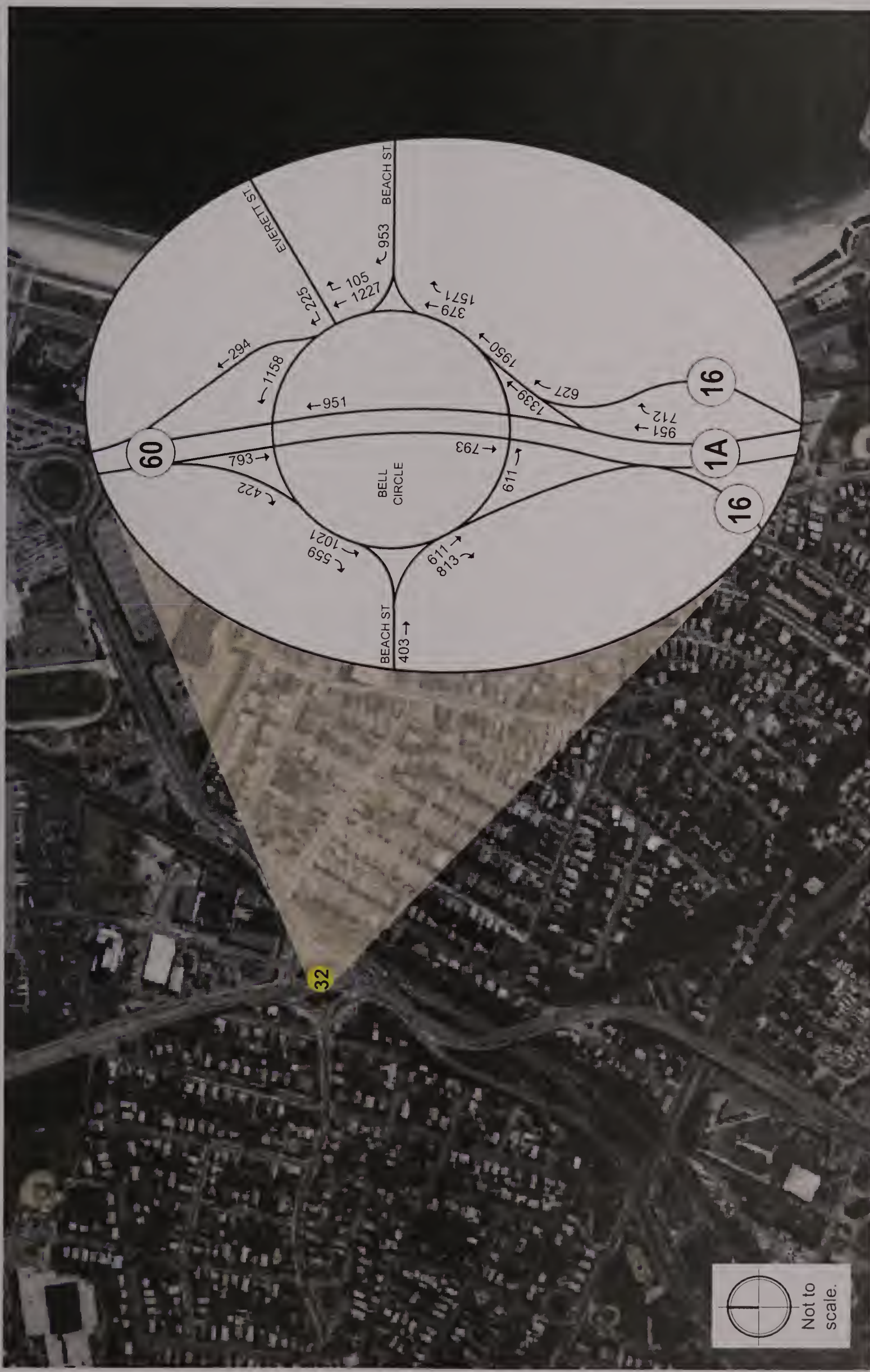
Wynn Resort in Everett
Everett, Massachusetts

Figure 2-35
Build (2023) Friday p.m. "Real" Peak Hour Traffic Volumes, Route 16, Chelsea
Source: Howard/Stein-Hudson Associates, Inc., 2015



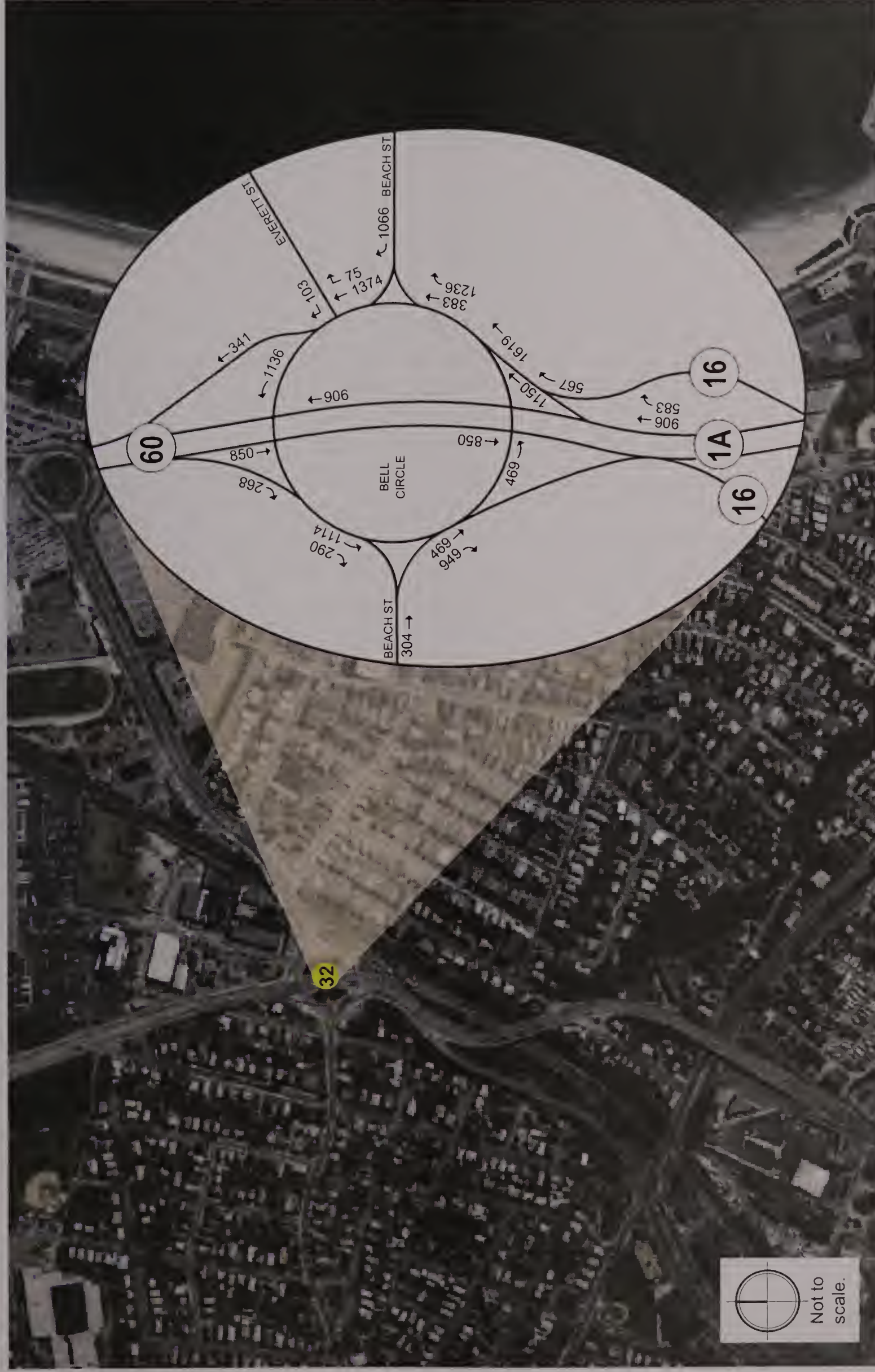
Wynn Resort in Everett
Everett, Massachusetts

Figure 2-36
Aerial Map, Revere Beach Parkway (Route 16) at Webster Avenue/Garfield Avenue, Chelsea
Source: Howard/Stein-Hudson Associates, Inc., 2014



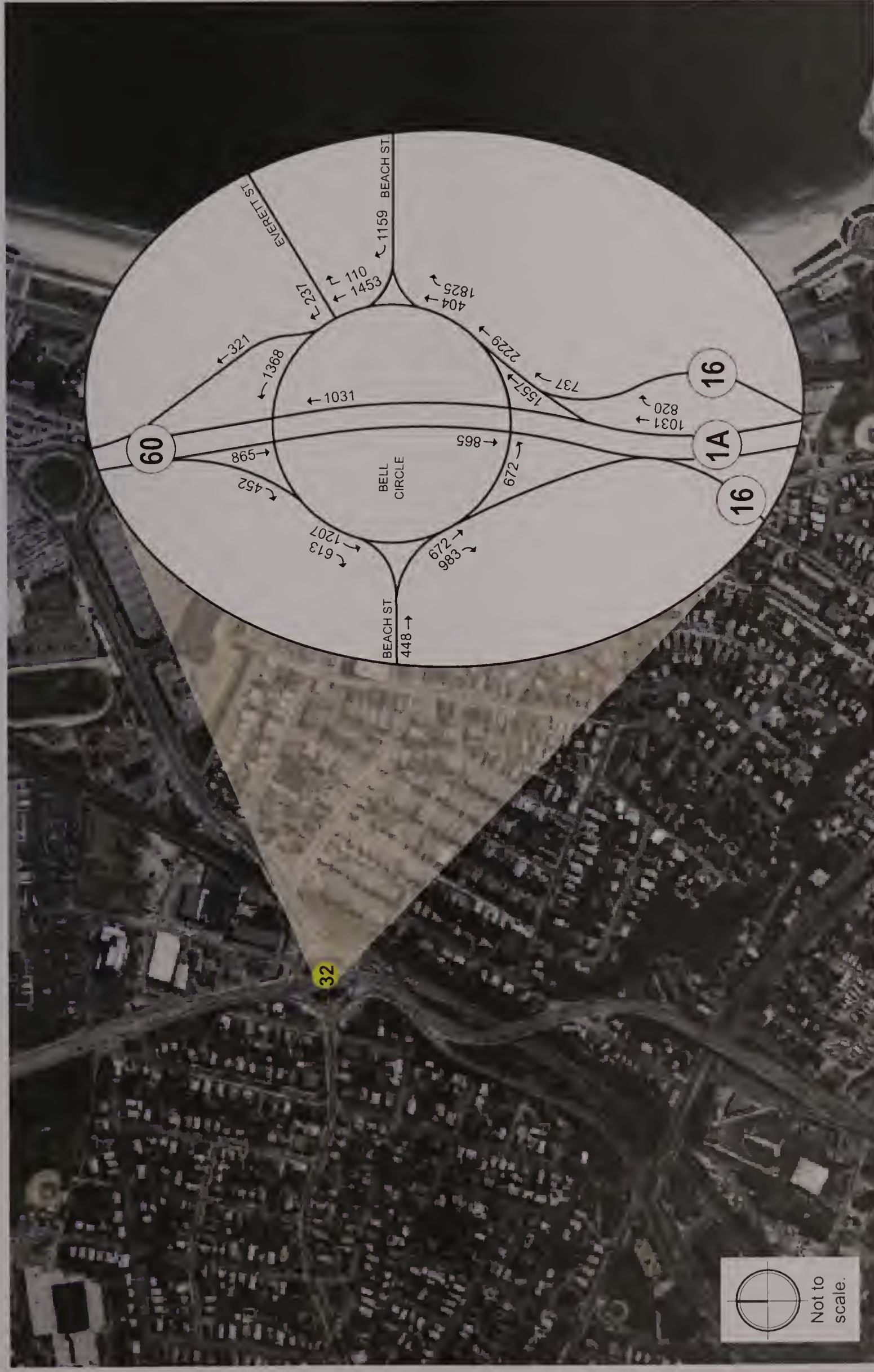
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Everett, Massachusetts

Figure 2-37
Existing (2013) Friday p.m. Peak Hour (4:30-5:30 p.m.) Traffic Volumes, Bell Circle, Revere
Source: Howard/Stein-Hudson Associates, Inc., 2015



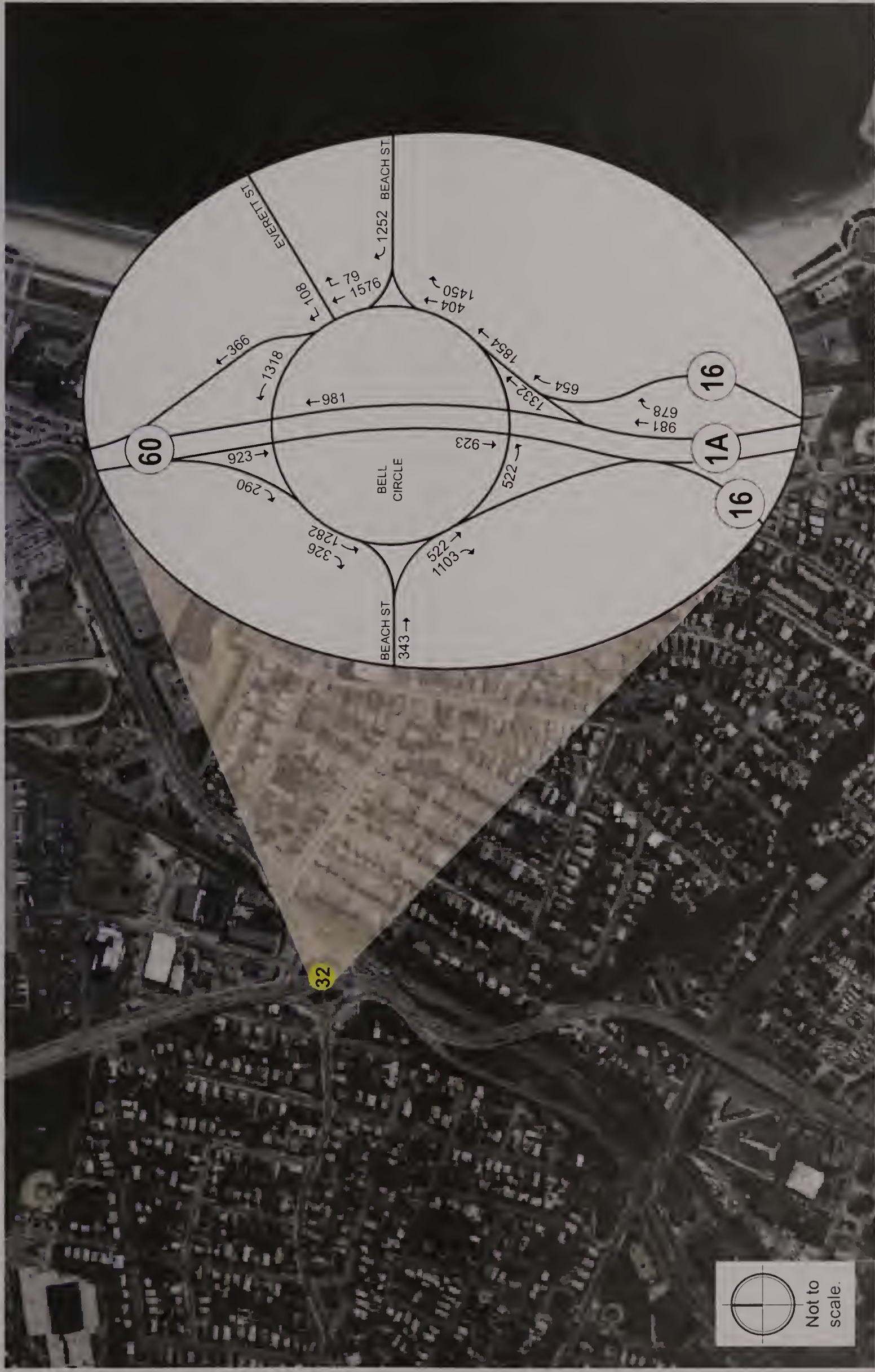
Wynn Resort in Everett
Everett, Massachusetts

Figure 2-38
Existing (2013) Saturday Afternoon Peak Hour (2:45-3:45 p.m.) Traffic Volumes, Bell Circle, Revere
Source: Howard/Stein-Hudson Associates, Inc., 2015



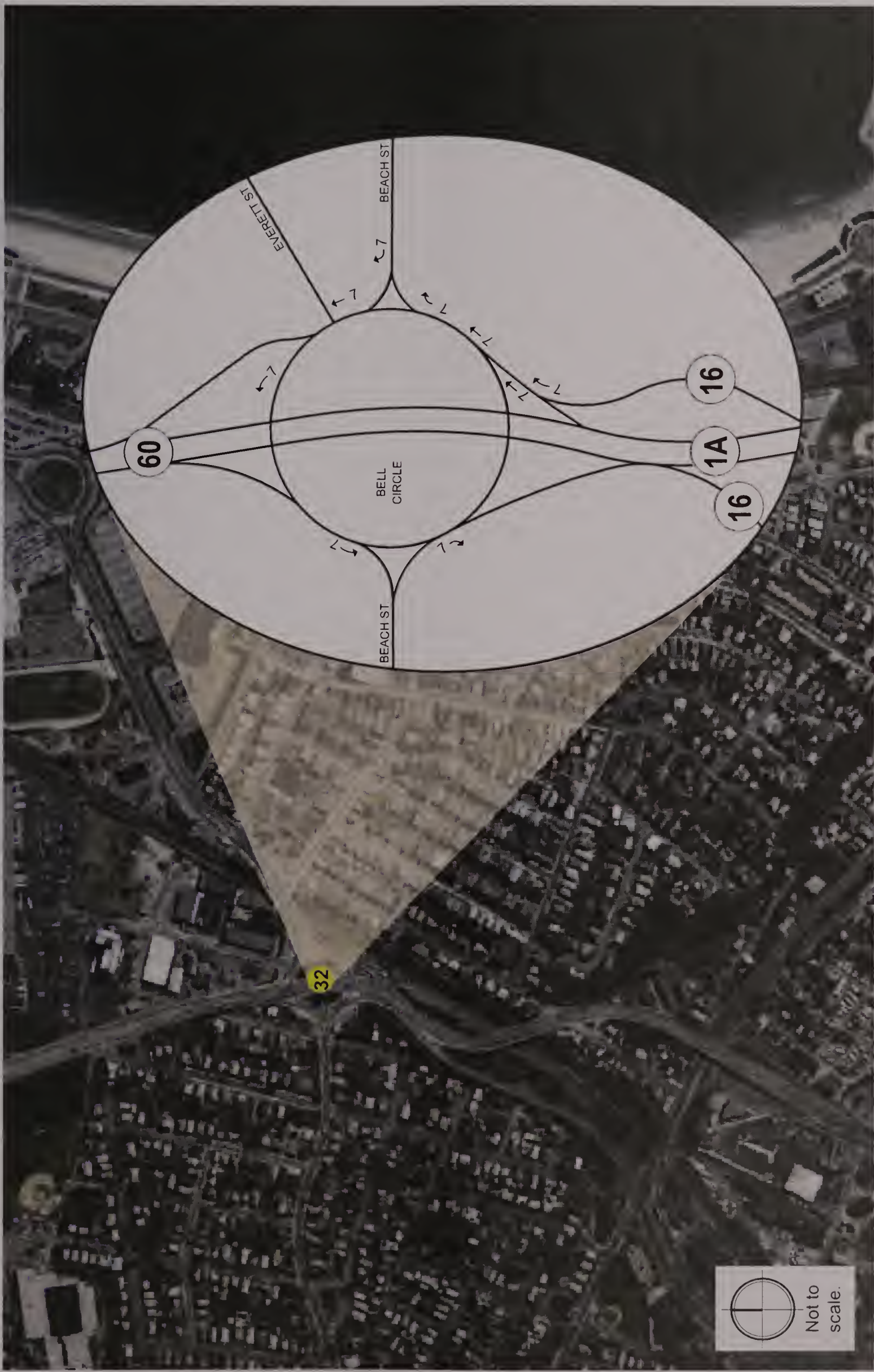
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Figure 2-39
No Build (2023) Friday p.m. Peak Hour Traffic Volumes, Bell Circle, Revere
Source: Howard/Stein-Hudson Associates, Inc., 2015



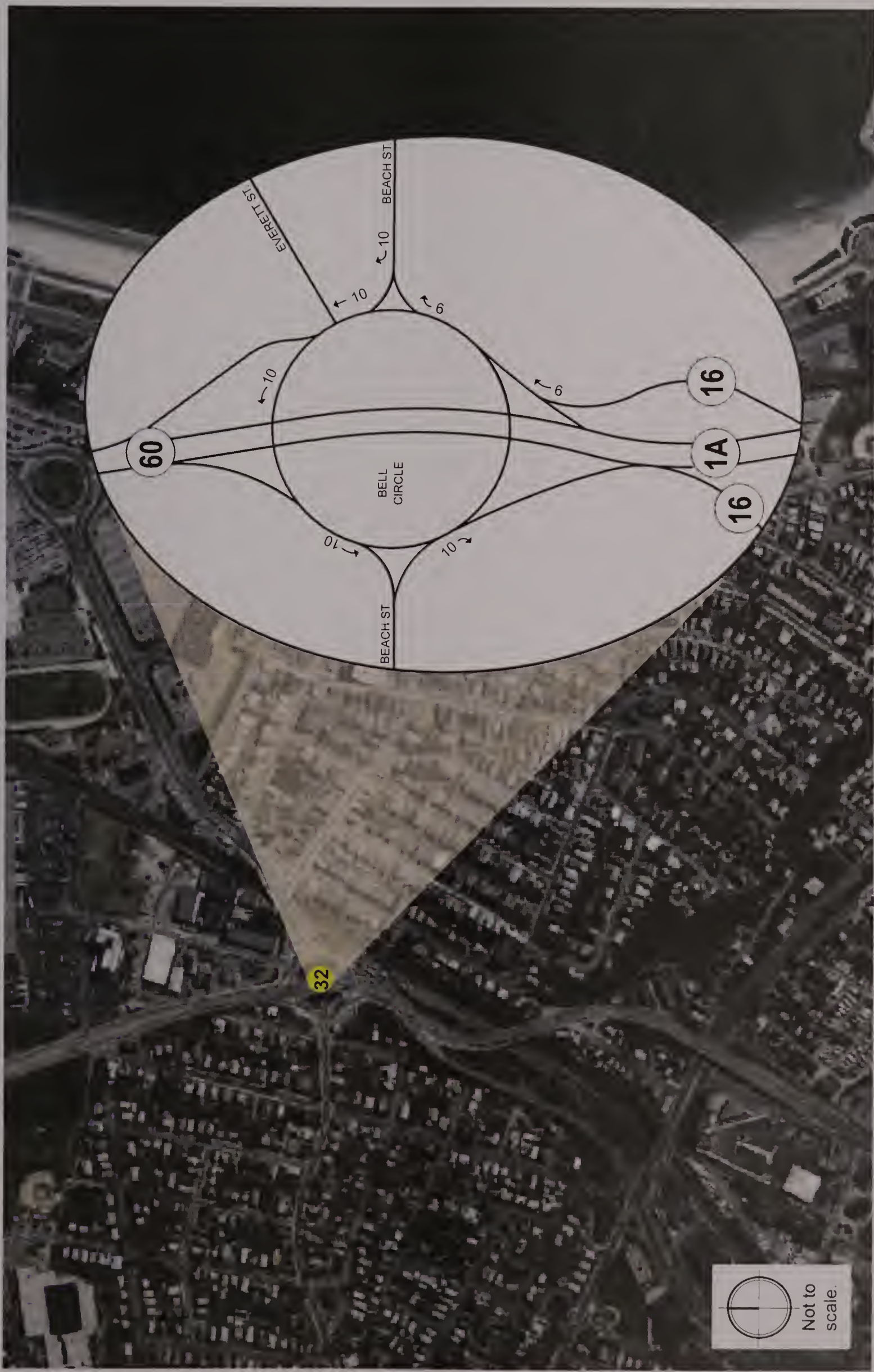
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Figure 2-40
No Build (2023) Saturday Afternoon Peak Hour Traffic Volumes, Bell Circle, Revere
Source: Howard/Stein-Hudson Associates, Inc., 2015



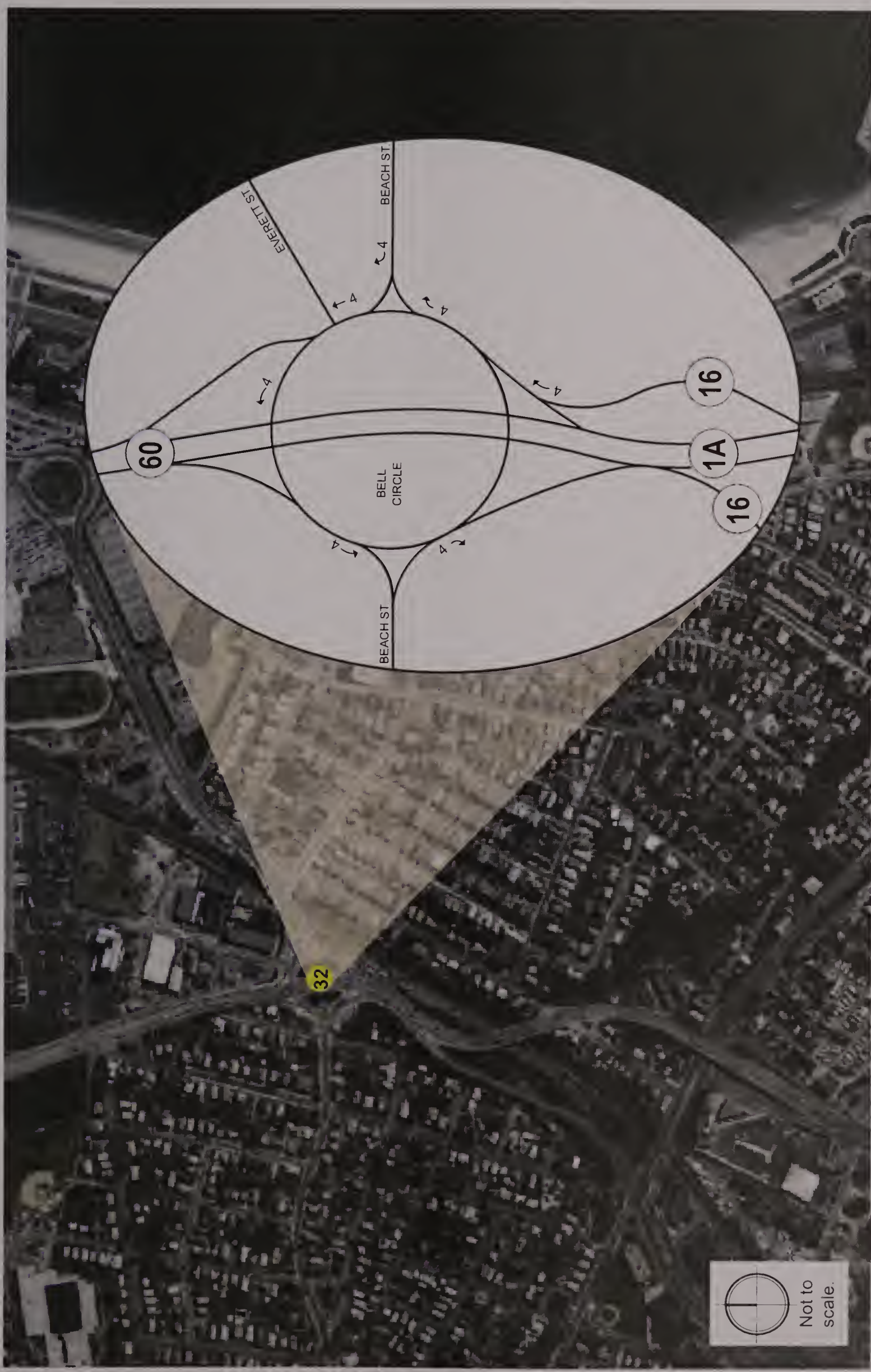
Wynn Resort in Everett
Everett, Massachusetts

Figure 2-41
Friday p.m. Peak Hour Project-generated Trips, Bell Circle, Revere
Source: Howard/Stein-Hudson Associates, Inc., 2015



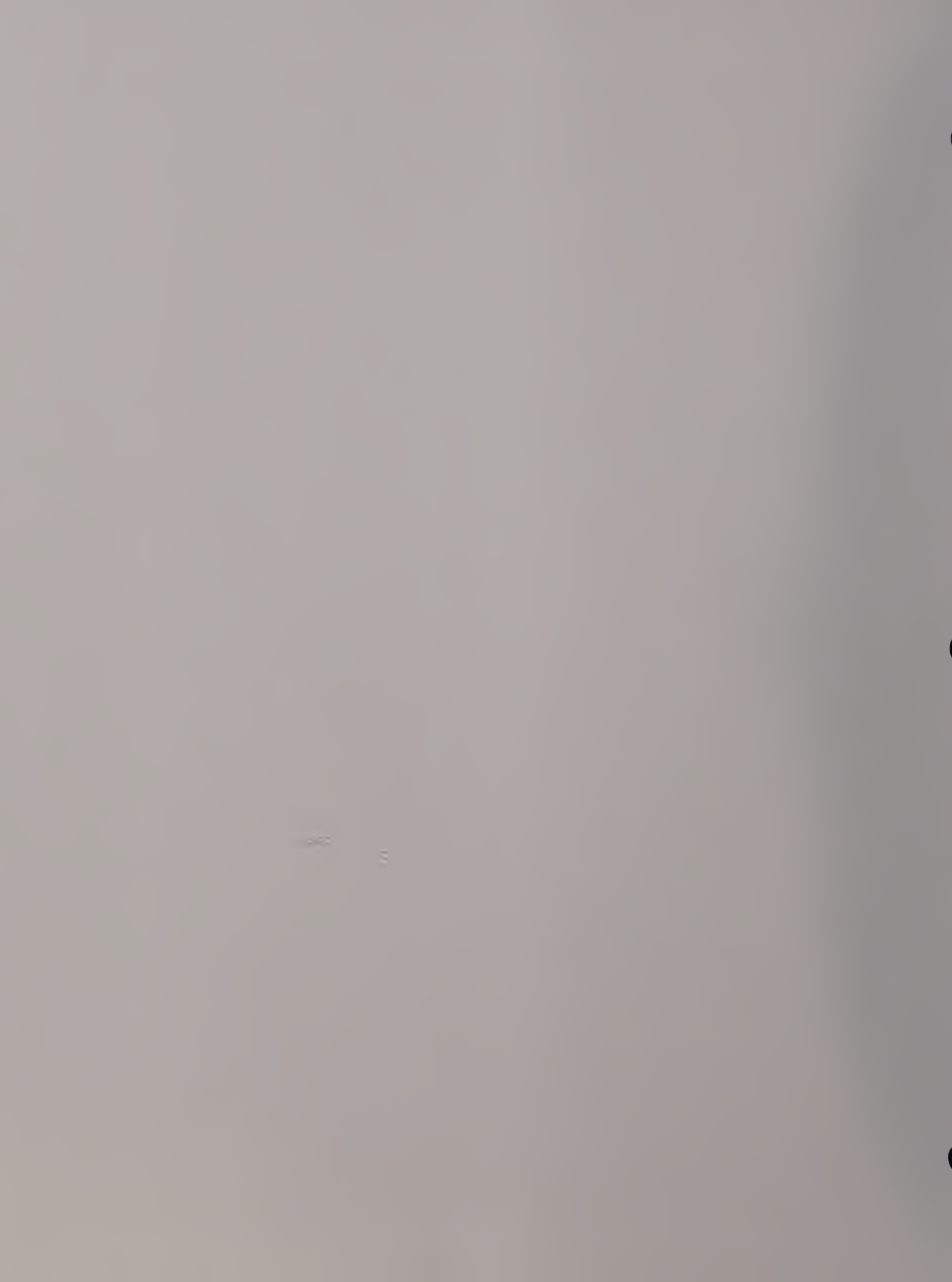
Wynn Resort in Everett
Everett, Massachusetts

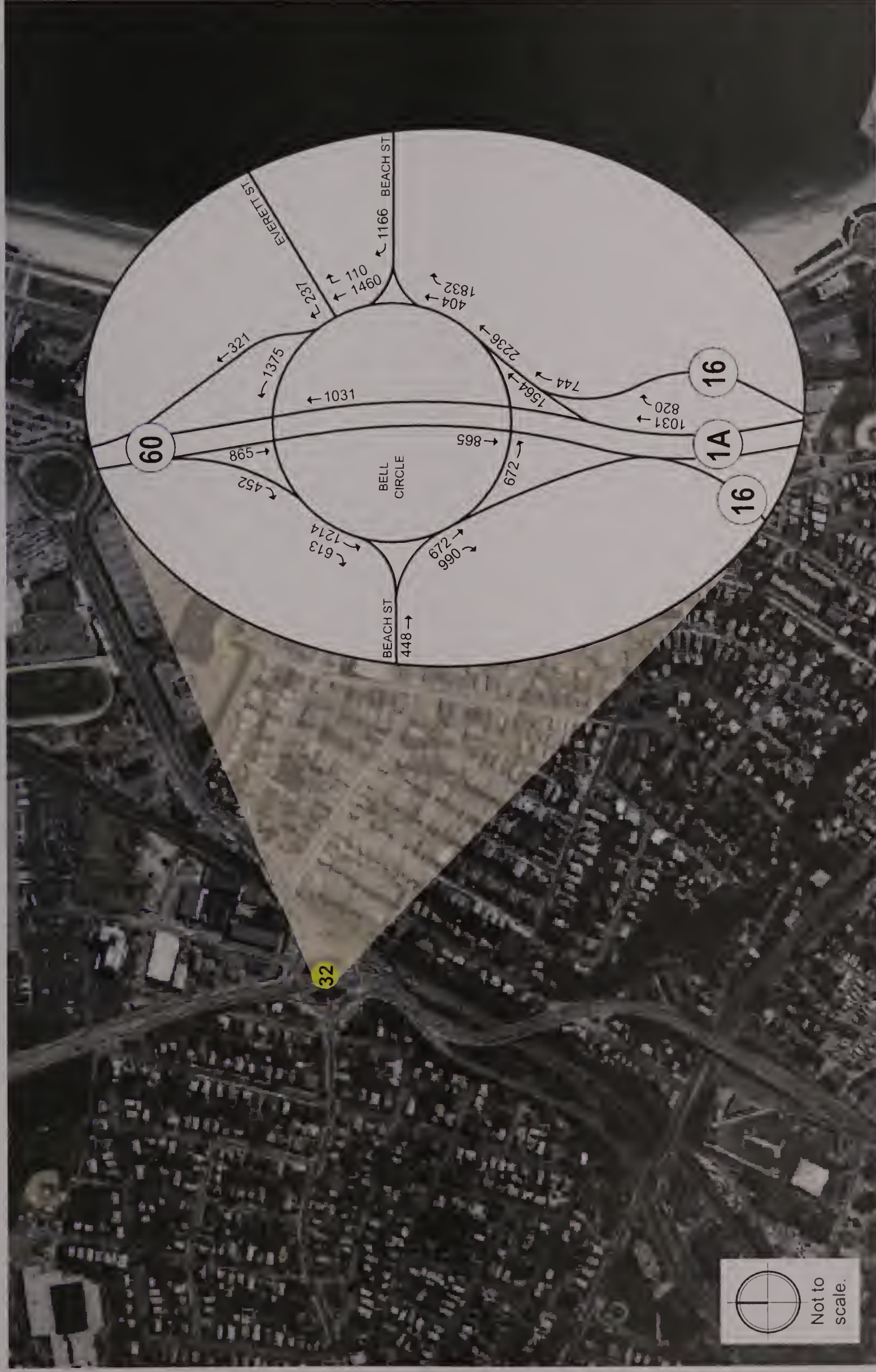
Figure 2-42
Saturday Afternoon Peak Hour Project-generated Trips, Bell Circle, Revere
Source: Howard/Stein-Hudson Associates, Inc., 2015



Wynn Resort in Everett
Everett, Massachusetts

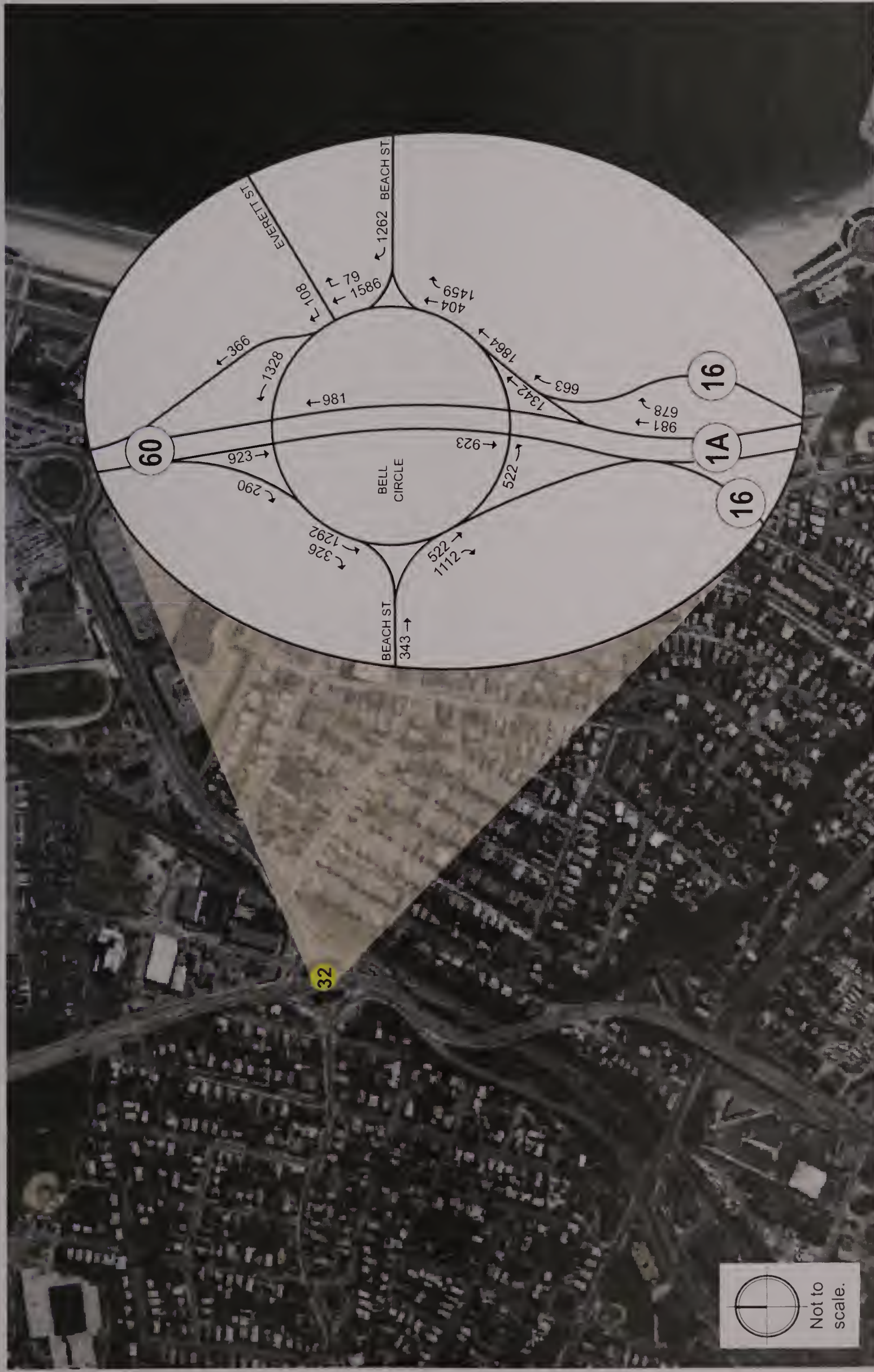
Figure 2-43
Friday p.m. "Real" Peak Hour Project-generated Trips, Bell Circle, Revere
Source: Howard/Stein-Hudson Associates, Inc., 2015





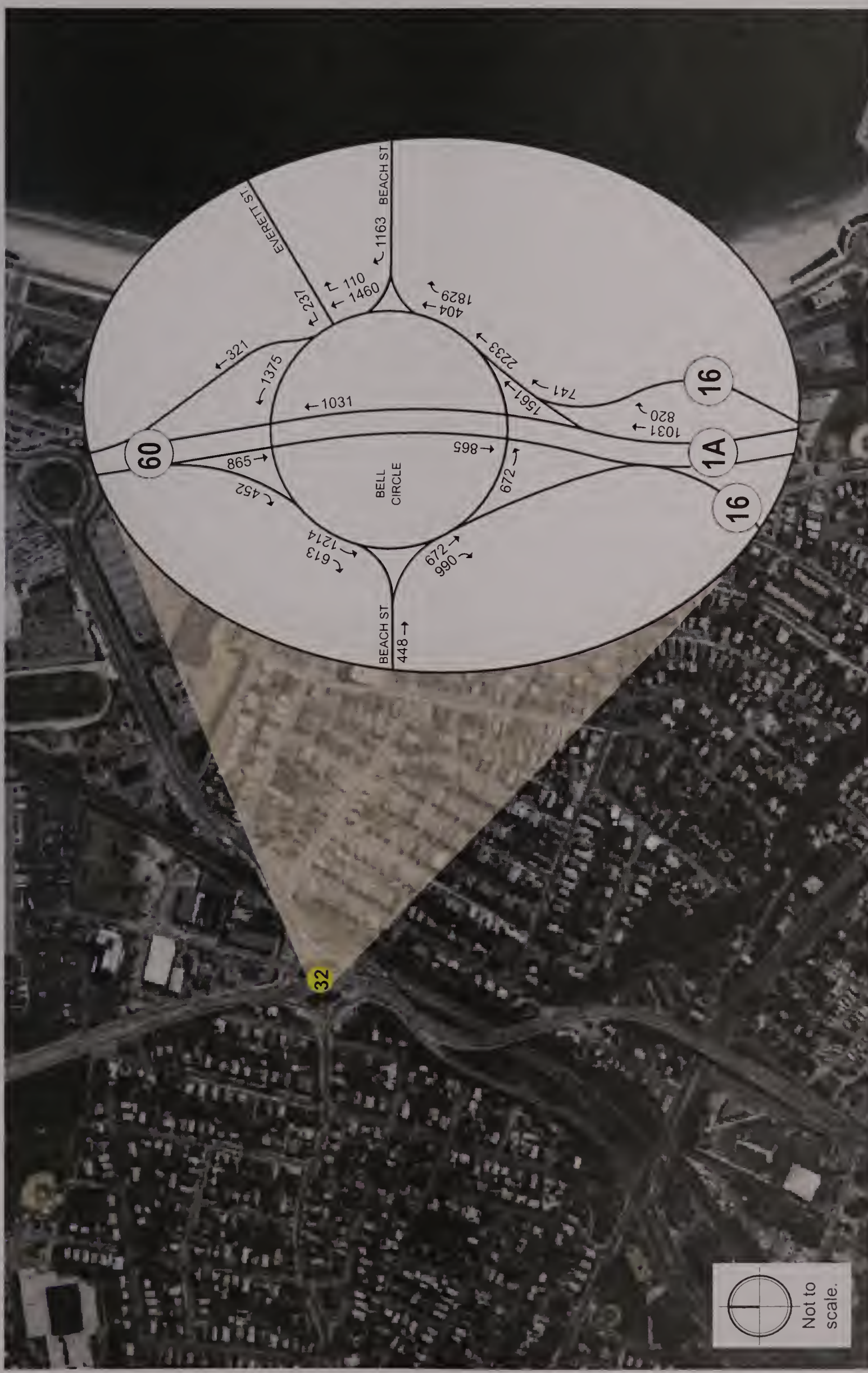
Wynn Resort in Everett
Everett, Massachusetts

Figure 2-44
Build (2023) Friday p.m. Peak Hour Traffic Volumes, Bell Circle, Revere
Source: Howard/Stein-Hudson Associates, Inc., 2015



Wynn Resort in Everett
Everett, Massachusetts

Figure 2-45
Build (2023) Saturday Afternoon Peak Hour Traffic Volumes, Bell Circle, Revere
Source: Howard/Stein-Hudson Associates, Inc., 2015



Wynn Resort in Everett
Everett, Massachusetts

Figure 2-46
Build (2023) Friday p.m. "Real" Peak Hour Traffic Volumes, Bell Circle, Revere
Source: Howard/Stein-Hudson Associates, Inc., 2015



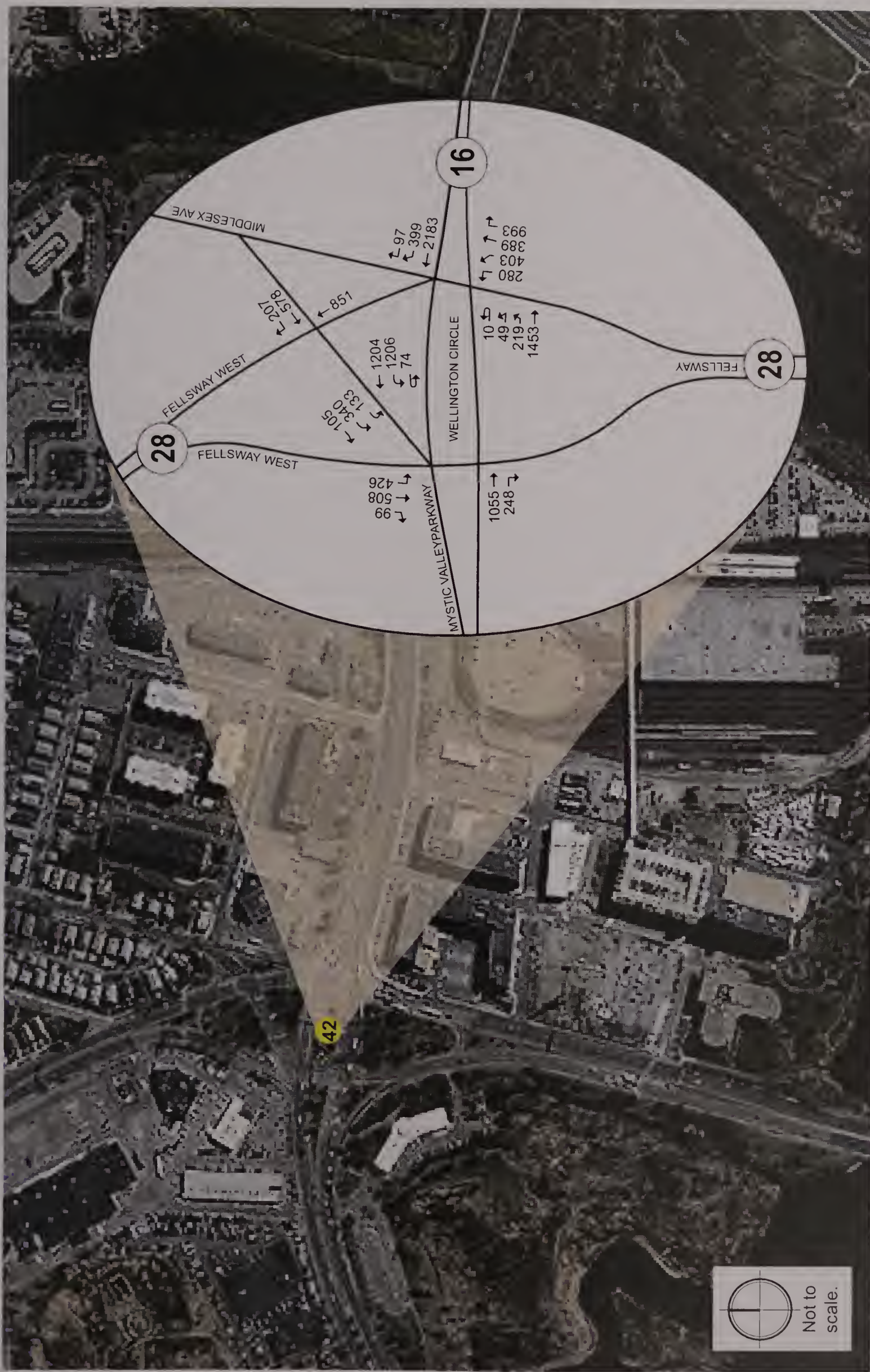
Wynn Resort in Everett
Everett, Massachusetts

Figure 2-47
Existing (2013) Friday p.m. Peak Hour (4:30-5:30 p.m.) Traffic Volumes, Wellington Circle, Medford
Source: Howard/Stein-Hudson Associates, Inc., 2015



Wynn Resort in Everett
Everett, Massachusetts

Figure 2-46
Build (2023) Friday p.m. "Real" Peak Hour Traffic Volumes, Bell Circle, Revere
Source: Howard/Stein-Hudson Associates, Inc., 2015



Wynn Resort in Everett
Everett, Massachusetts

Figure 2-48
Existing (2013) Saturday Afternoon Peak Hour (2:45-3:45 p.m.) Traffic Volumes, Wellington Circle, Medford
Source: Howard/Stein-Hudson Associates, Inc., 2015



Wynn Resort in Everett
Everett, Massachusetts

Figure 2-49
No Build (2023) Friday p.m. Peak Hour Traffic Volumes, Wellington Circle, Medford
Source: Howard/Stein-Hudson Associates, Inc., 2015



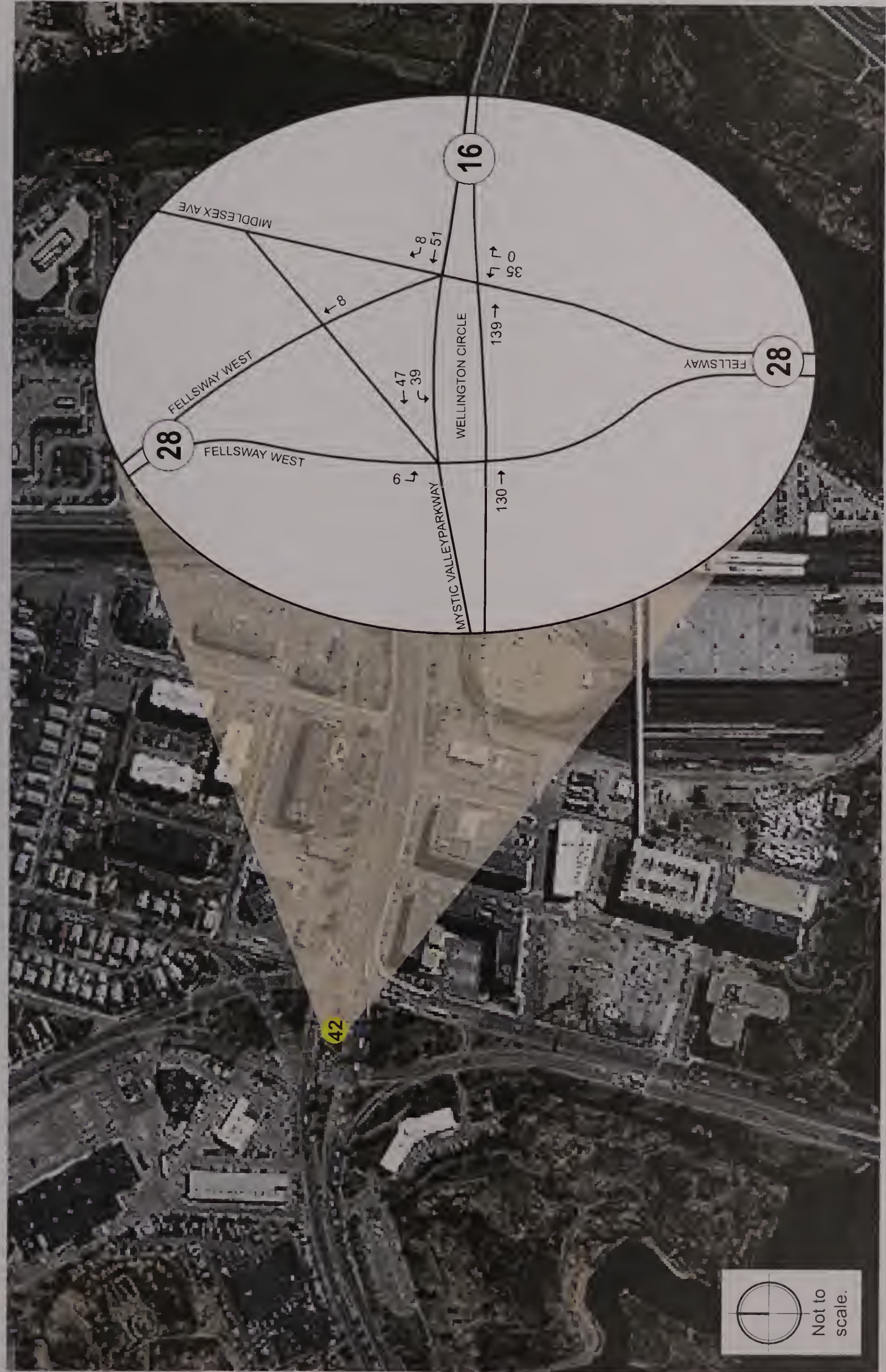
Wynn Resort in Everett
Everett, Massachusetts

Figure 2-50
No Build (2023) Saturday Afternoon Peak Hour Traffic Volumes, Wellington Circle, Medford
Source: Howard/Stein-Hudson Associates, Inc., 2015



Wynn Resort in Everett
Everett, Massachusetts

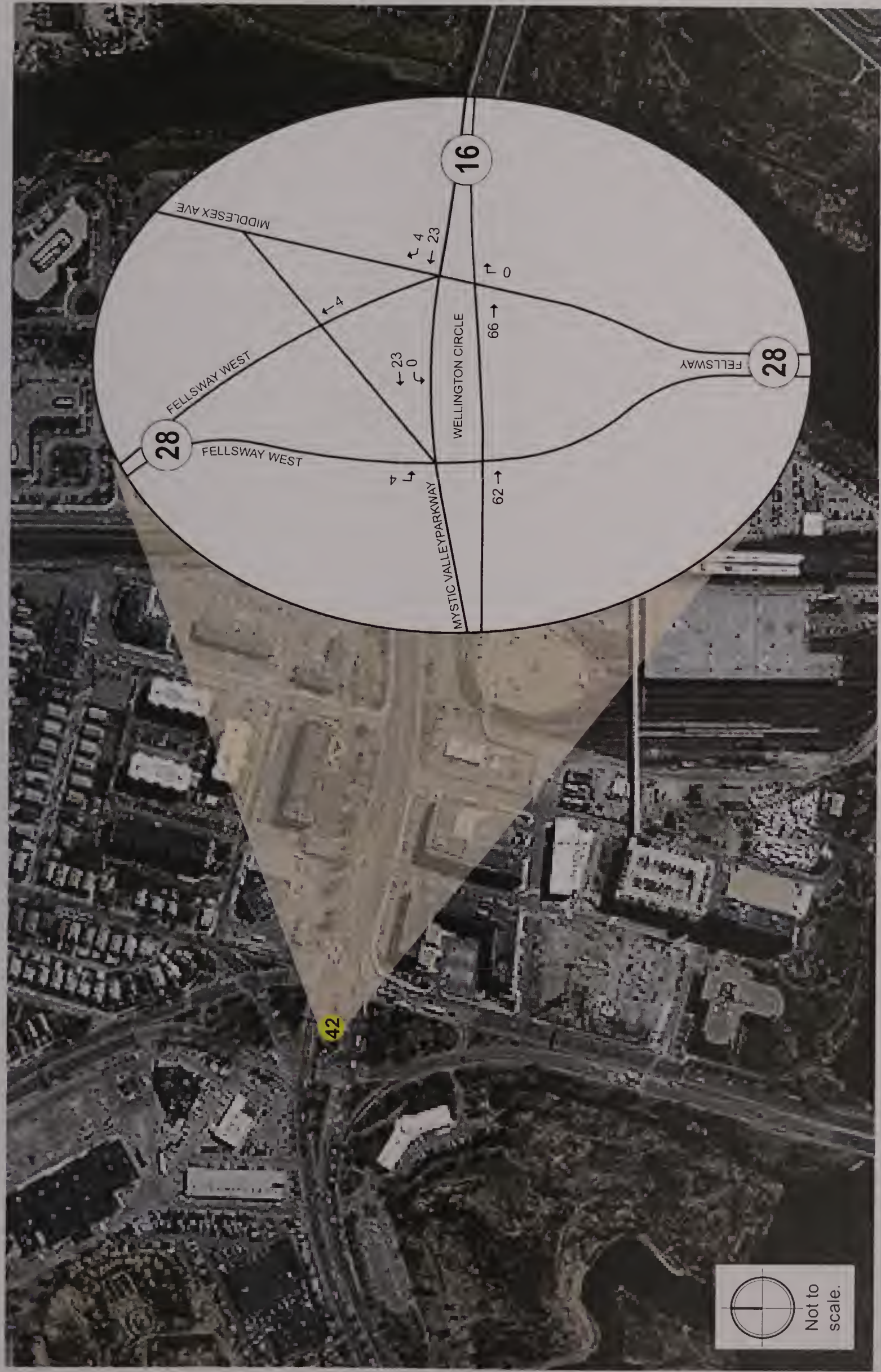
Figure 2-51
Friday p.m. Peak Hour Project-generated Trips, Wellington Circle, Medford
Source: Howard/Stein-Hudson Associates, Inc., 2015



Wynn Resort in Everett
Everett, Massachusetts

Figure 2-52
Saturday Afternoon Peak Hour Project-generated Trips, Wellington Circle, Medford
Source: Howard/Stein-Hudson Associates, Inc., 2015





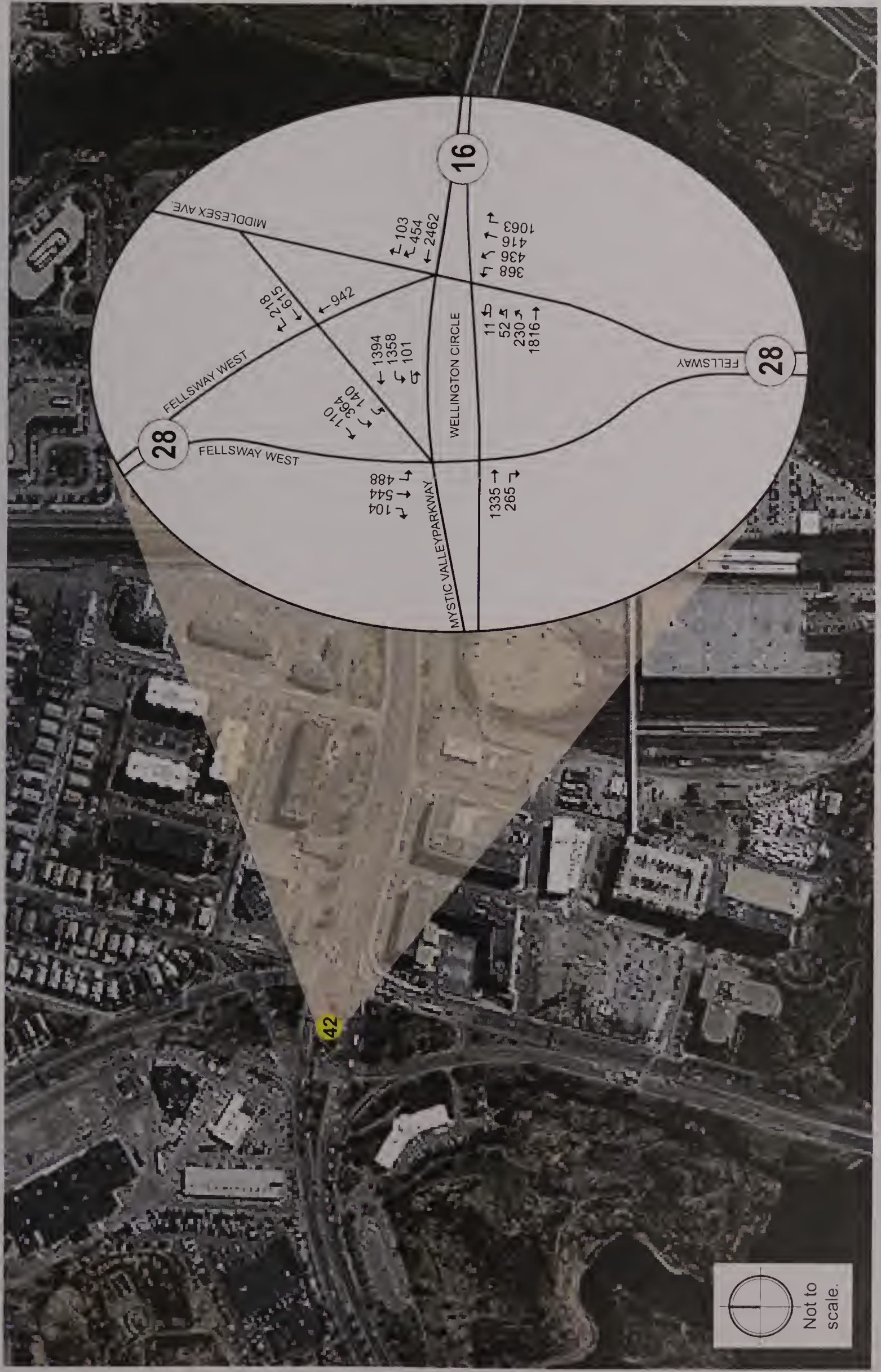
Wynn Resort in Everett
Everett, Massachusetts

Figure 2-53
Friday p.m. "Real" Peak Hour Project-generated Trips, Wellington Circle, Medford
Source: Howard/Stein-Hudson Associates, Inc., 2015



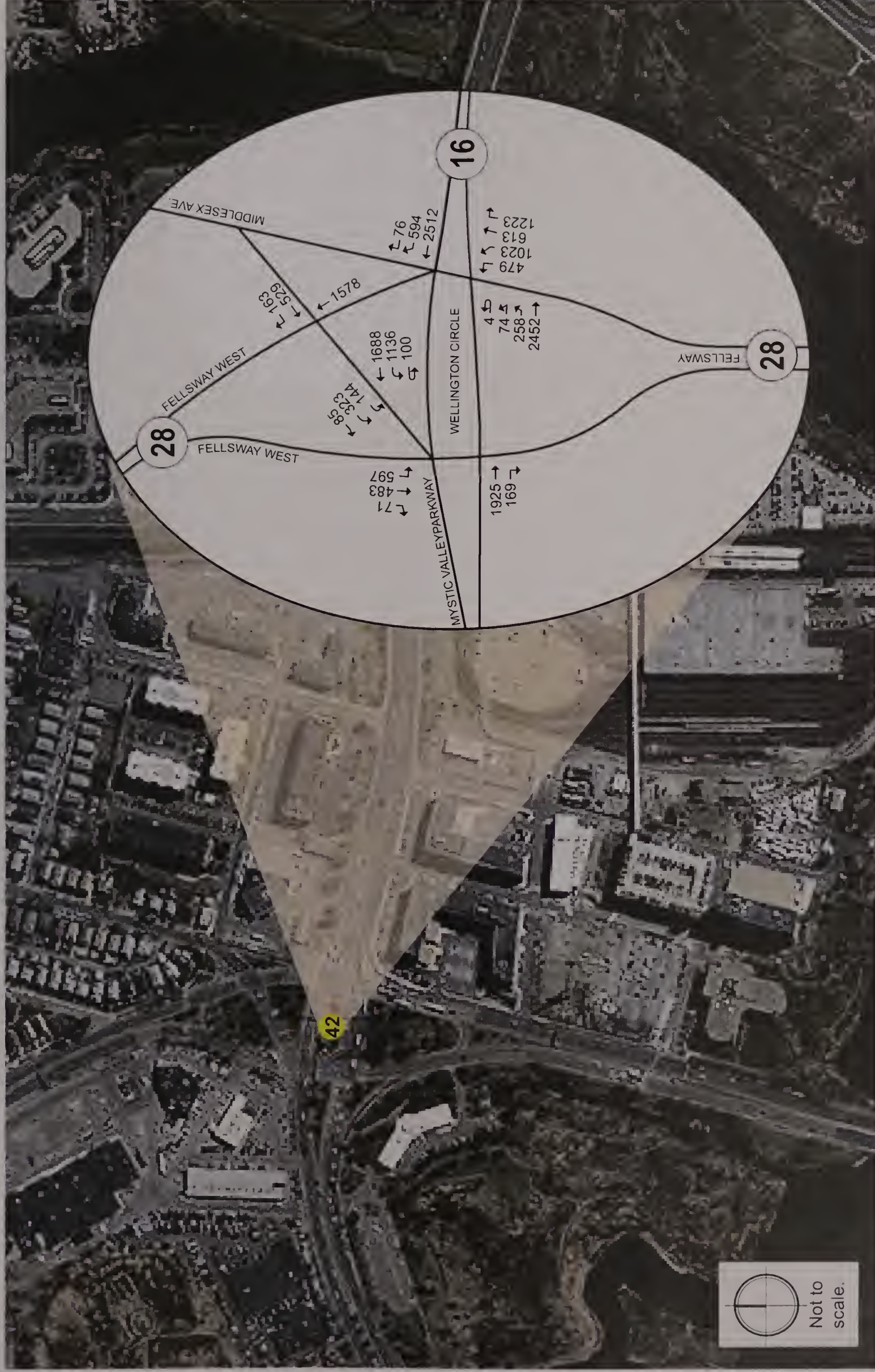
Wynn Resort in Everett
Everett, Massachusetts

Figure 2-54
Build (2023) Friday p.m. Peak Hour Traffic Volumes, Wellington Circle, Medford
Source: Howard/Stein-Hudson Associates, Inc., 2015



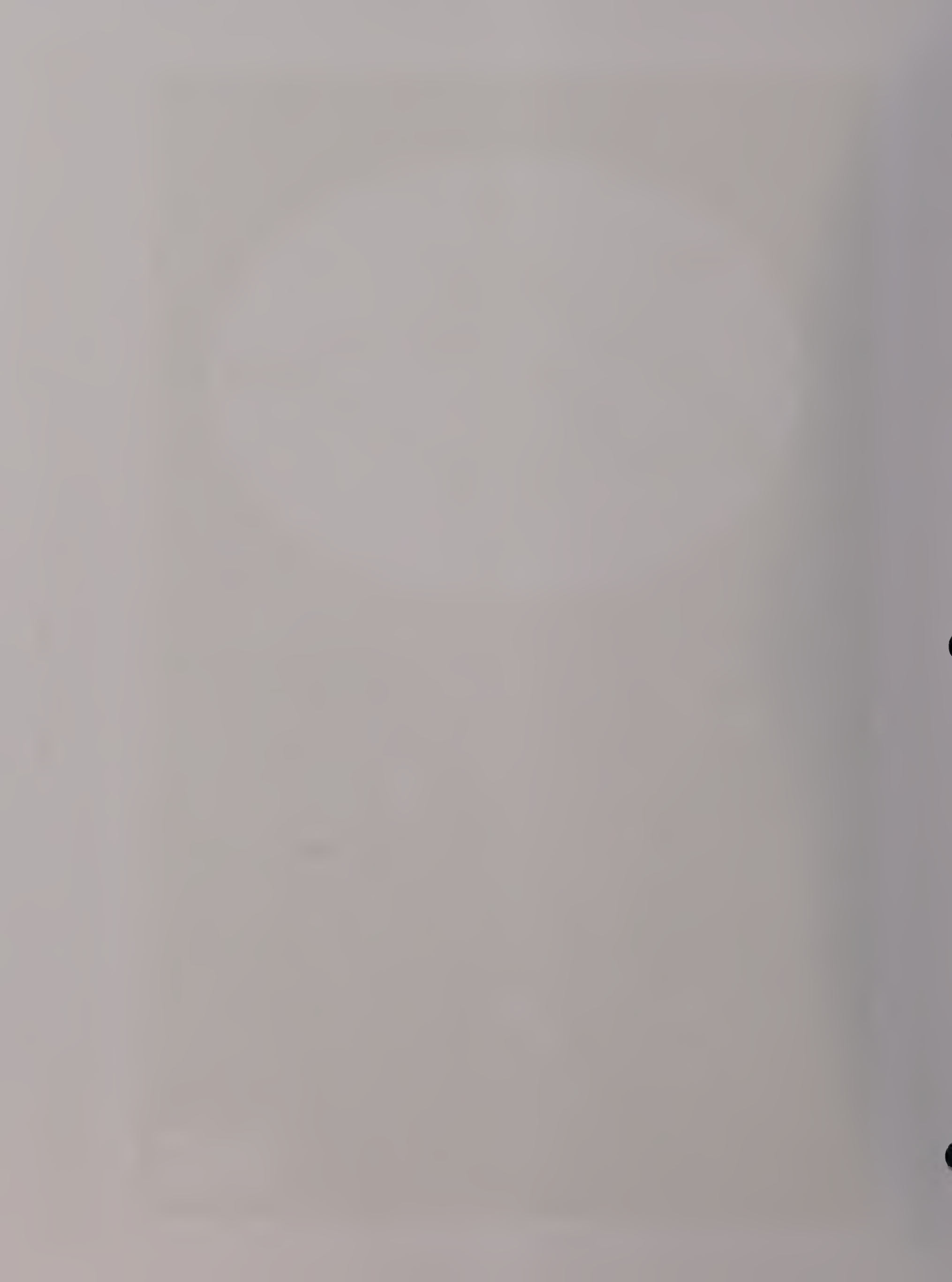
Wynn Resort in Everett
Everett, Massachusetts

Figure 2-55
Build (2023) Saturday Afternoon Peak Hour Traffic Volumes, Wellington Circle, Medford
Source: Howard/Stein-Hudson Associates, Inc., 2015



Wynn Resort in Everett
Everett, Massachusetts

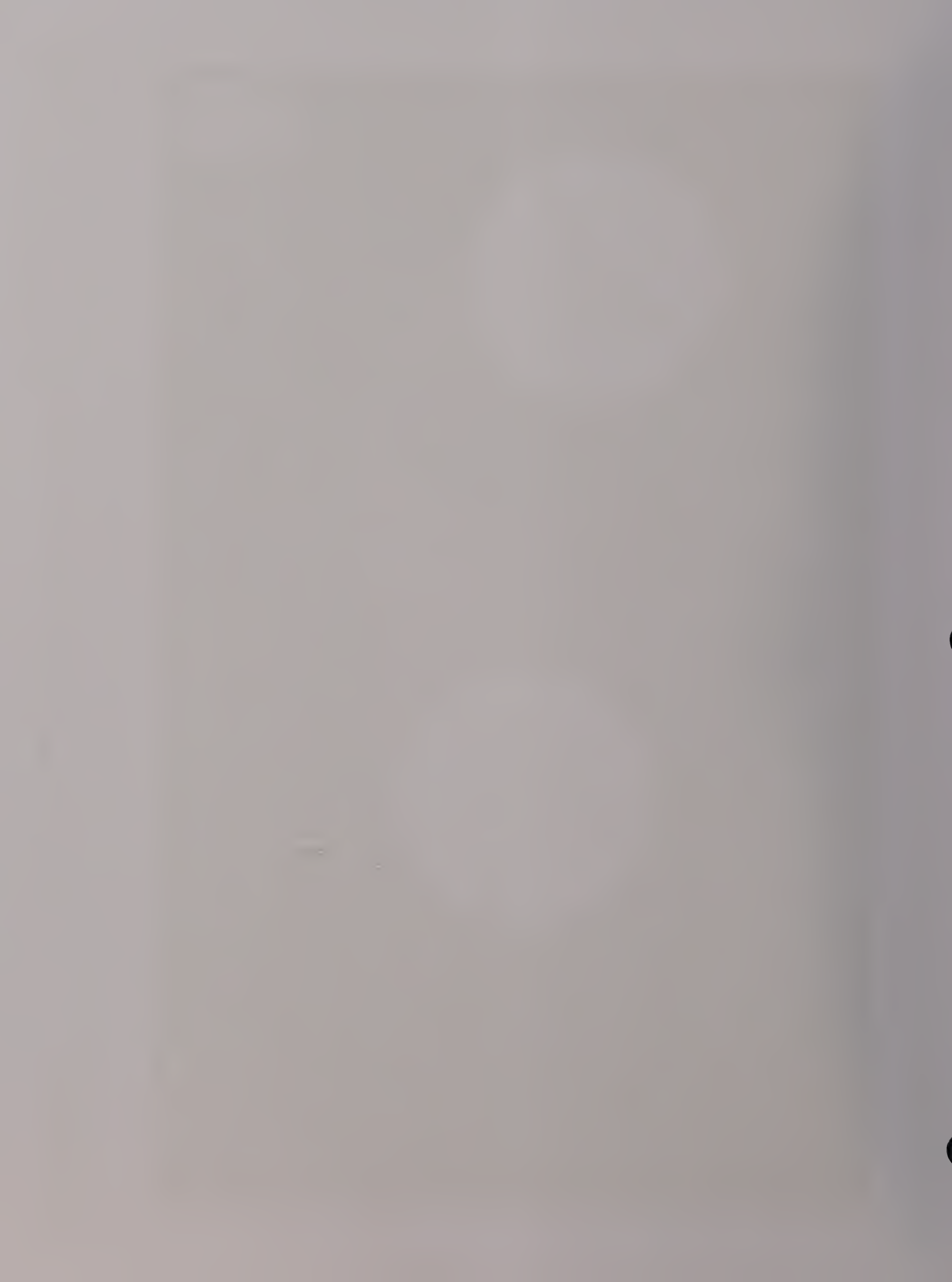
Figure 2-56
Build (2023) Friday p.m. "Real" Peak Hour Traffic Volumes, Wellington Circle, Medford
Source: Howard/Stein-Hudson Associates, Inc., 2015





Wynn Resort in Everett
Everett, Massachusetts

Figure 2-57
Existing (2013) Friday p.m. Peak Hour (4:30-5:30 p.m.) Traffic Volumes, Two Locations, Route 16, Medford
Source: Howard/Stein-Hudson Associates, Inc., 2015





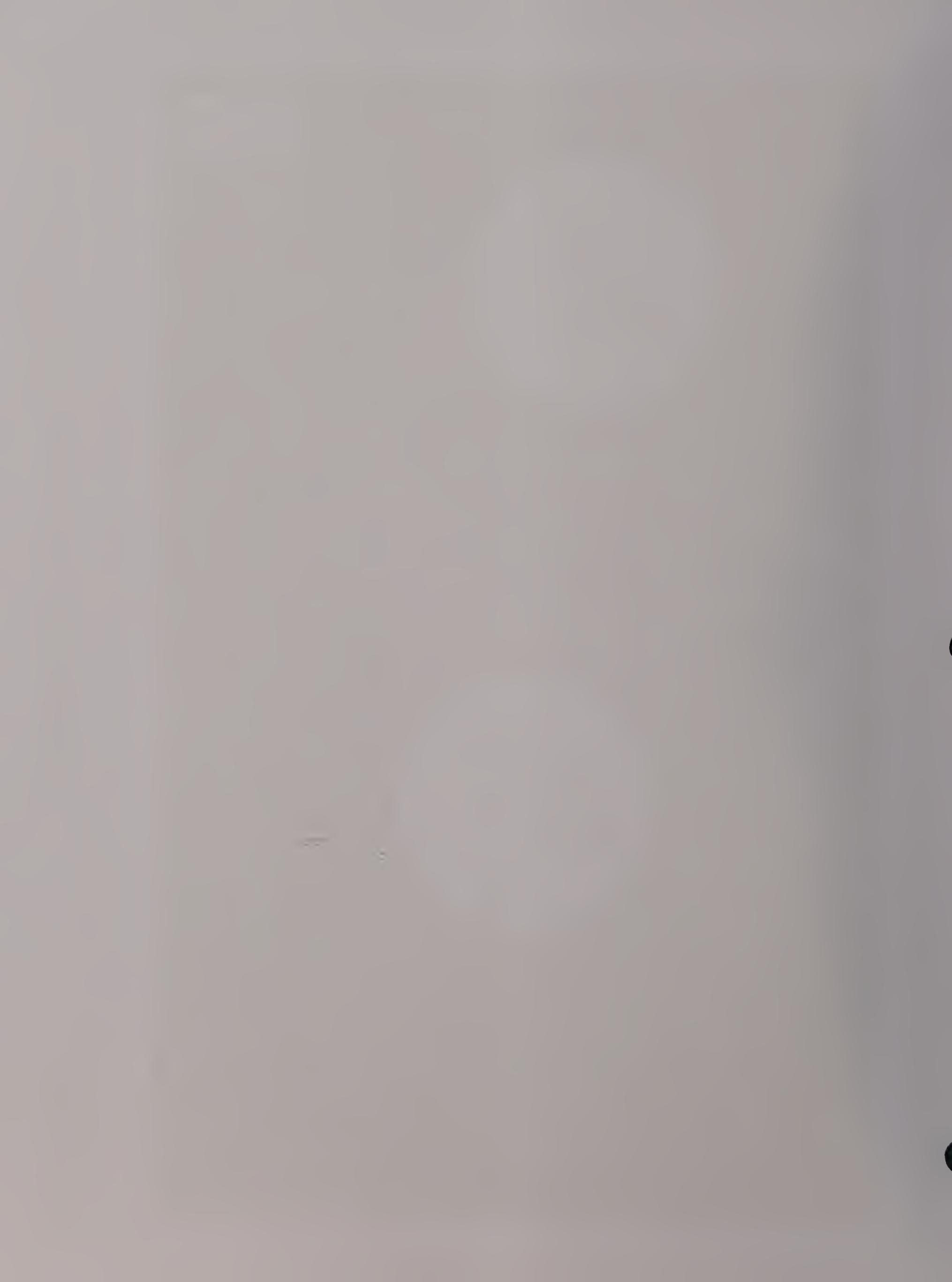
Wynn Resort in Everett
Everett, Massachusetts

Figure 2-58
Existing (2013) Saturday Afternoon Peak Hour (2:45-3:45 p.m.) Traffic Volumes, Two Locations, Route 16, Medford
Source: Howard/Stein-Hudson Associates, Inc., 2015



Wynn Resort in Everett
Everett, Massachusetts

Figure 2-59
No Build (2023) Friday p.m. Peak Hour Traffic Volumes, Two Locations, Route 16, Medford
Source: Howard/Stein-Hudson Associates, Inc., 2015





Wynn Resort in Everett
Everett, Massachusetts

Figure 2-60
No Build (2023) Saturday Afternoon Peak Hour Traffic Volumes, Two Locations, Route 16, Medford
Source: Howard/Stein-Hudson Associates, Inc., 2015



Wynn Resort in Everett
Everett, Massachusetts

Figure 2-61
Friday p.m. Peak Hour Project-generated Trips, Two Locations, Route 16, Medford
Source: Howard/Stein-Hudson Associates, Inc., 2015



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Everett, Massachusetts

Figure 2-62
Saturday Afternoon Peak Hour Project-generated Trips, Two Locations, Route 16, Medford
Source: Howard/Stein-Hudson Associates, Inc., 2015



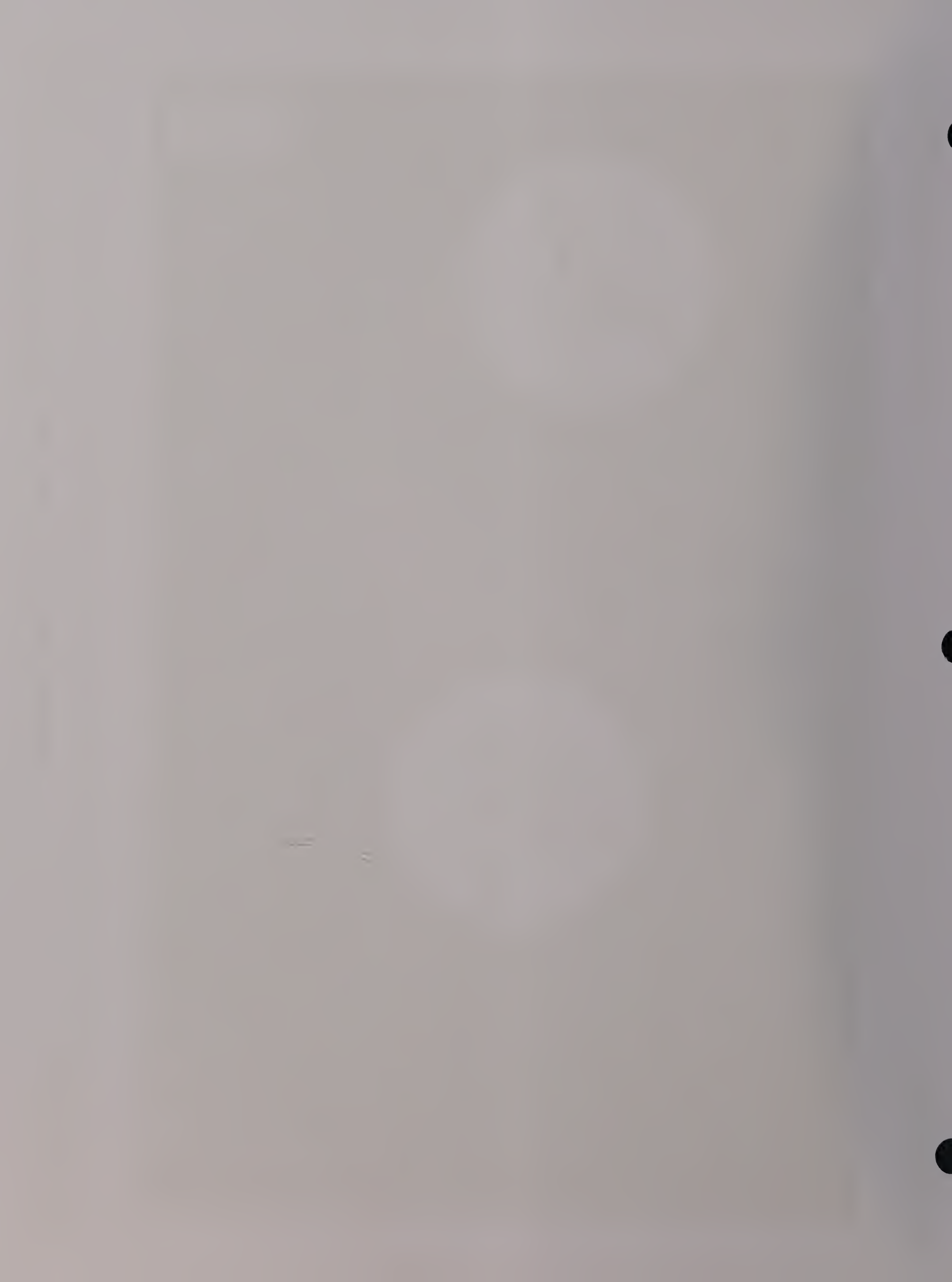
Wynn Resort in Everett
Everett, Massachusetts

Figure 2-63
Friday p.m. "Real" Peak Hour Project-generated Trips, Two Locations, Route 16, Medford
Source: Howard/Stein-Hudson Associates, Inc., 2015



Wynn Resort in Everett
Everett, Massachusetts

Figure 2-64
Build (2023) Friday p.m. Peak Hour Traffic Volumes, Two Locations, Route 16, Medford
Source: Howard/Stein-Hudson Associates, Inc., 2015





Wynn Resort in Everett
Everett, Massachusetts

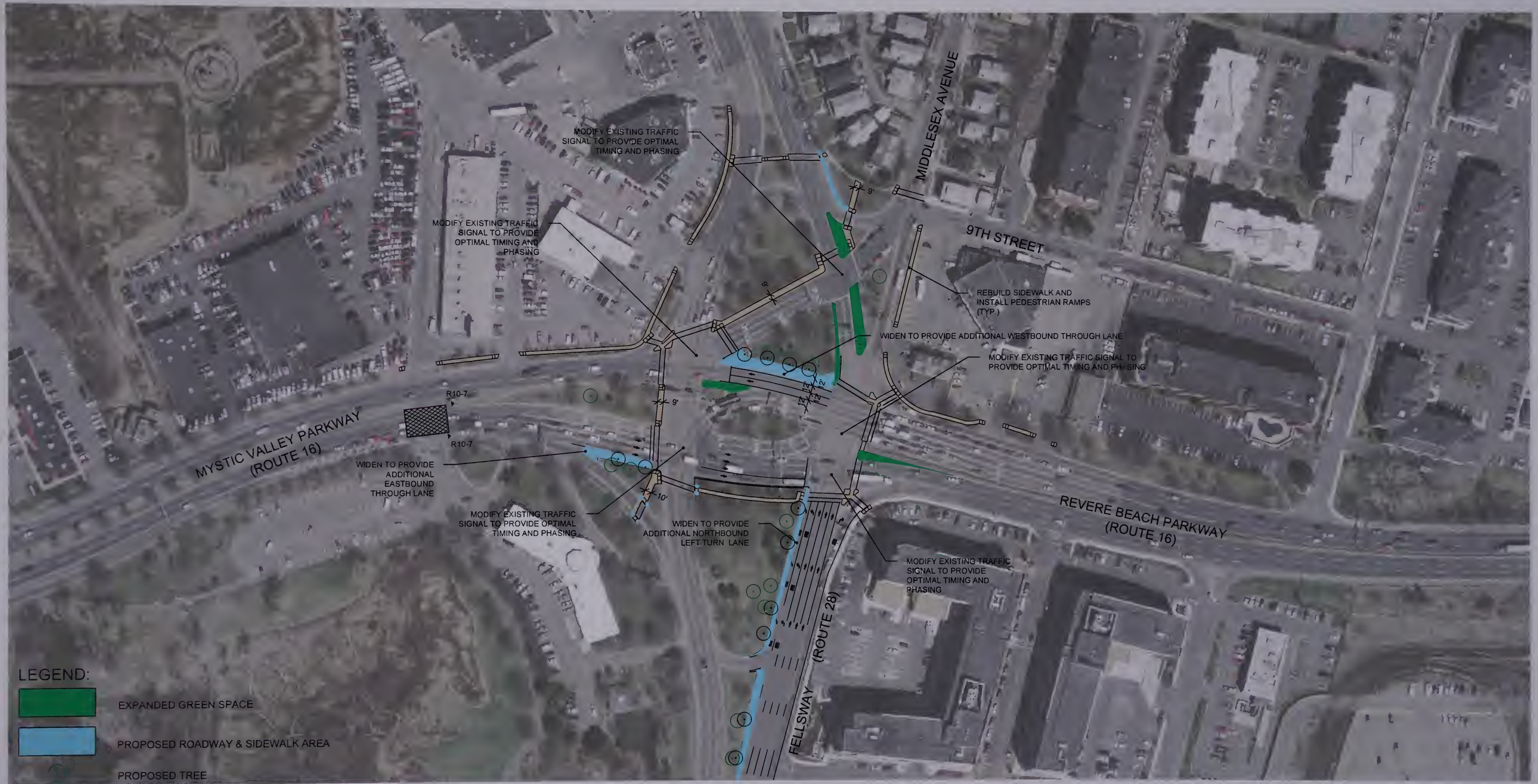
Figure 2-65
Build (2023) Saturday Afternoon Peak Hour Traffic Volumes, Two Locations, Route 16, Medford
Source: Howard/Stein-Hudson Associates, Inc., 2015



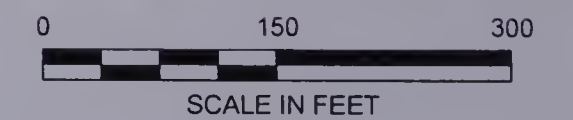
Wynn Resort in Everett
Everett, Massachusetts

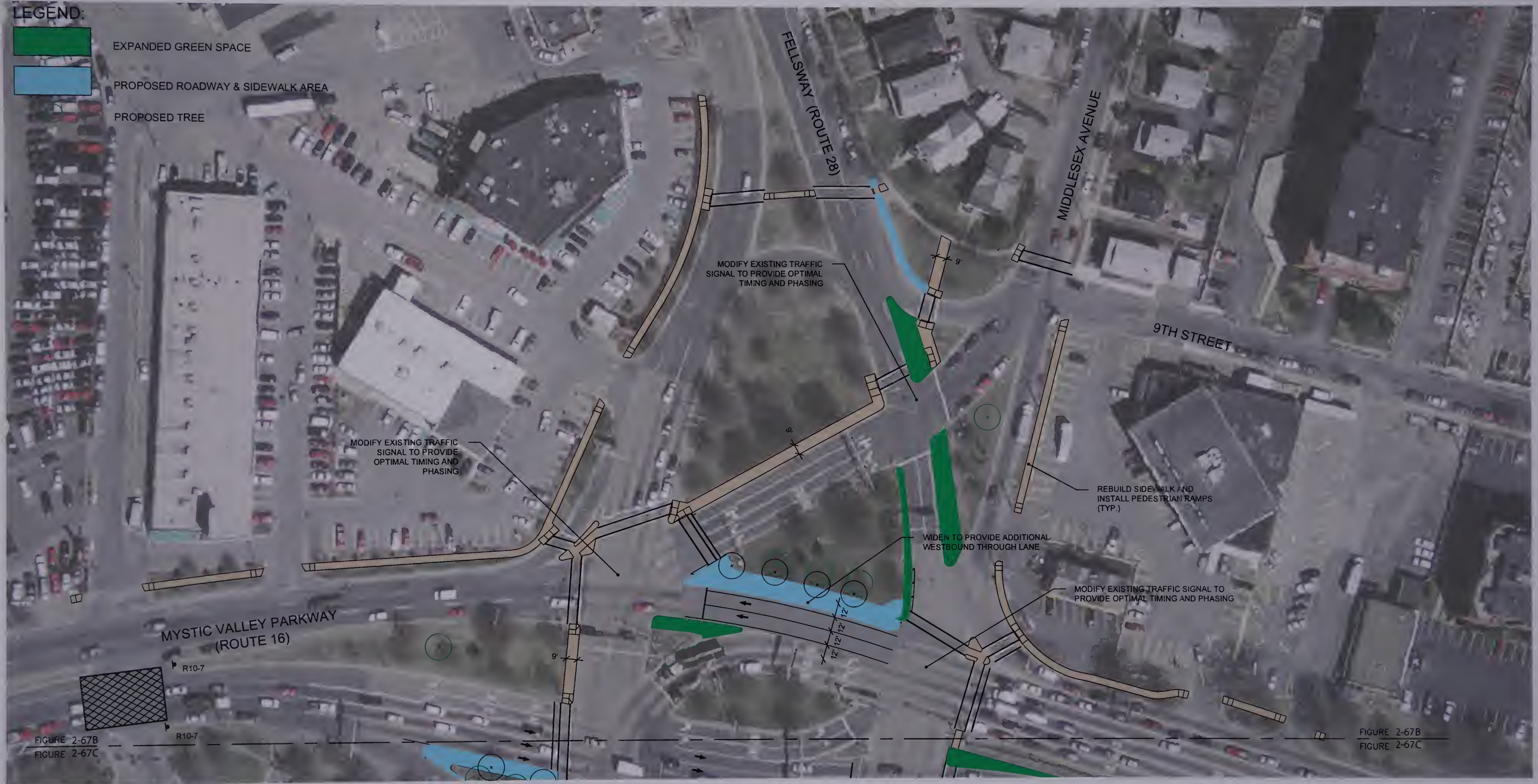
Figure 2-66
Build (2023) Friday p.m. "Real" Peak Hour Traffic Volumes, Two Locations, Route 16, Medford
Source: Howard/Stein-Hudson Associates, Inc., 2015



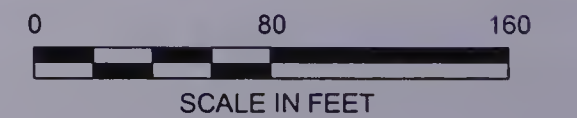


*ALL LANE WIDTHS ARE 11' UNLESS OTHERWISE NOTED
 *ALL SIDEWALK WIDTHS ARE 6' UNLESS OTHERWISE NOTED





*ALL LANE WIDTHS ARE 11' UNLESS OTHERWISE NOTED
 *ALL SIDEWALK WIDTHS ARE 6' UNLESS OTHERWISE NOTED



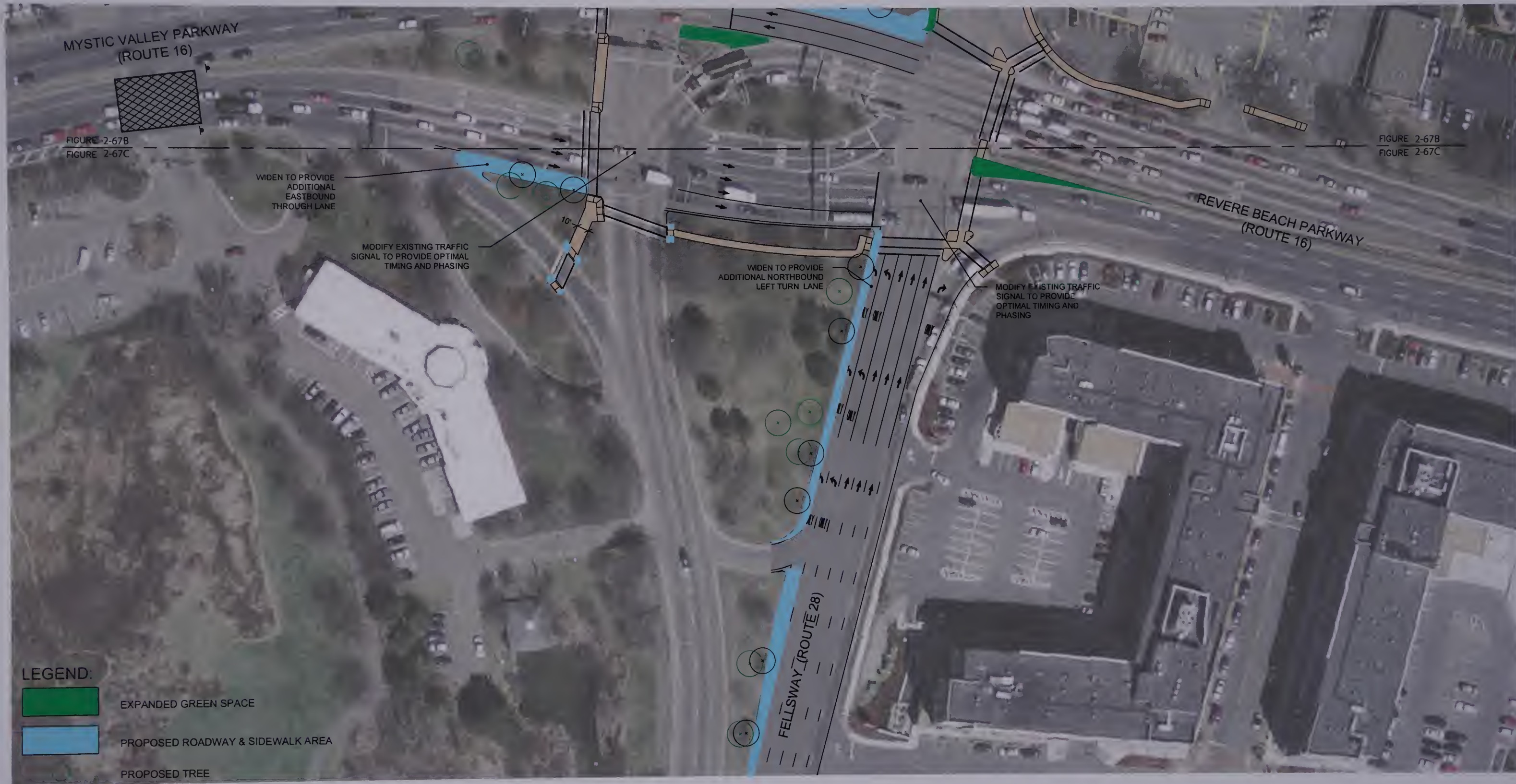


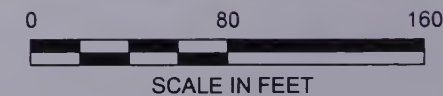
FIGURE 2-67B
FIGURE 2-67C

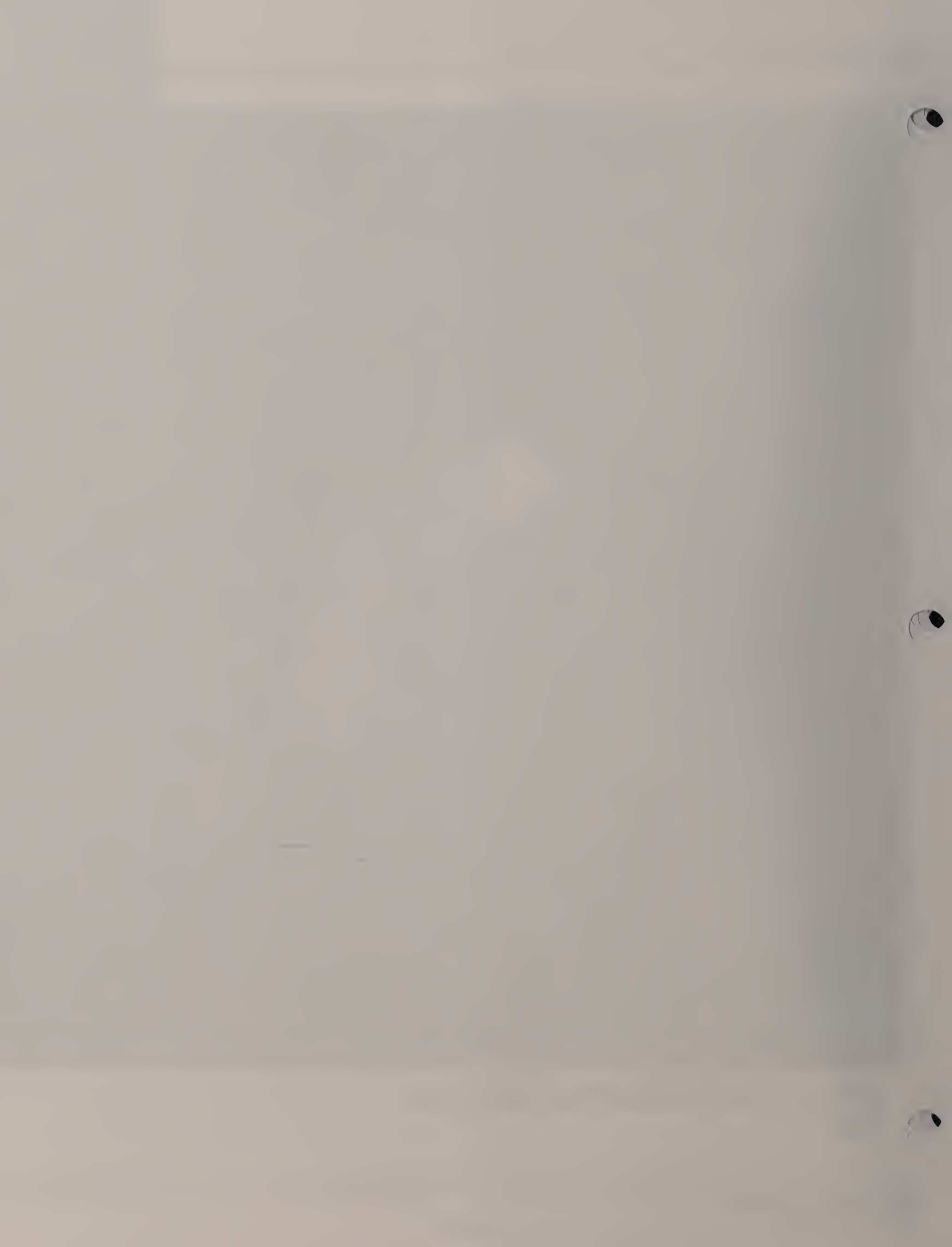
FIGURE 2-67B
FIGURE 2-67C

LEGEND:

- EXPANDED GREEN SPACE
- PROPOSED ROADWAY & SIDEWALK AREA
- PROPOSED TREE

*ALL LANE WIDTHS ARE 11' UNLESS OTHERWISE NOTED
 *ALL SIDEWALK WIDTHS ARE 6' UNLESS OTHERWISE NOTED





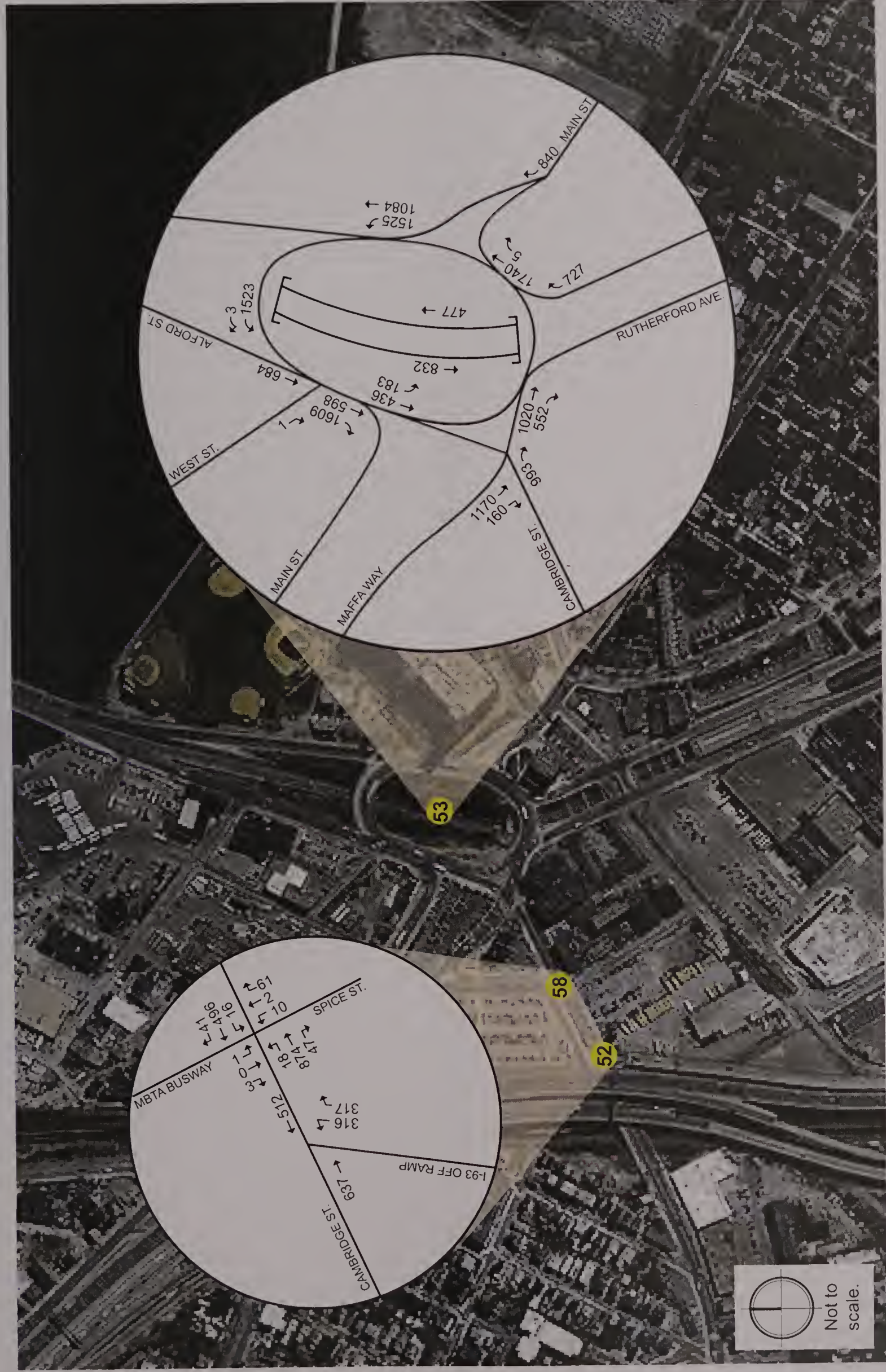
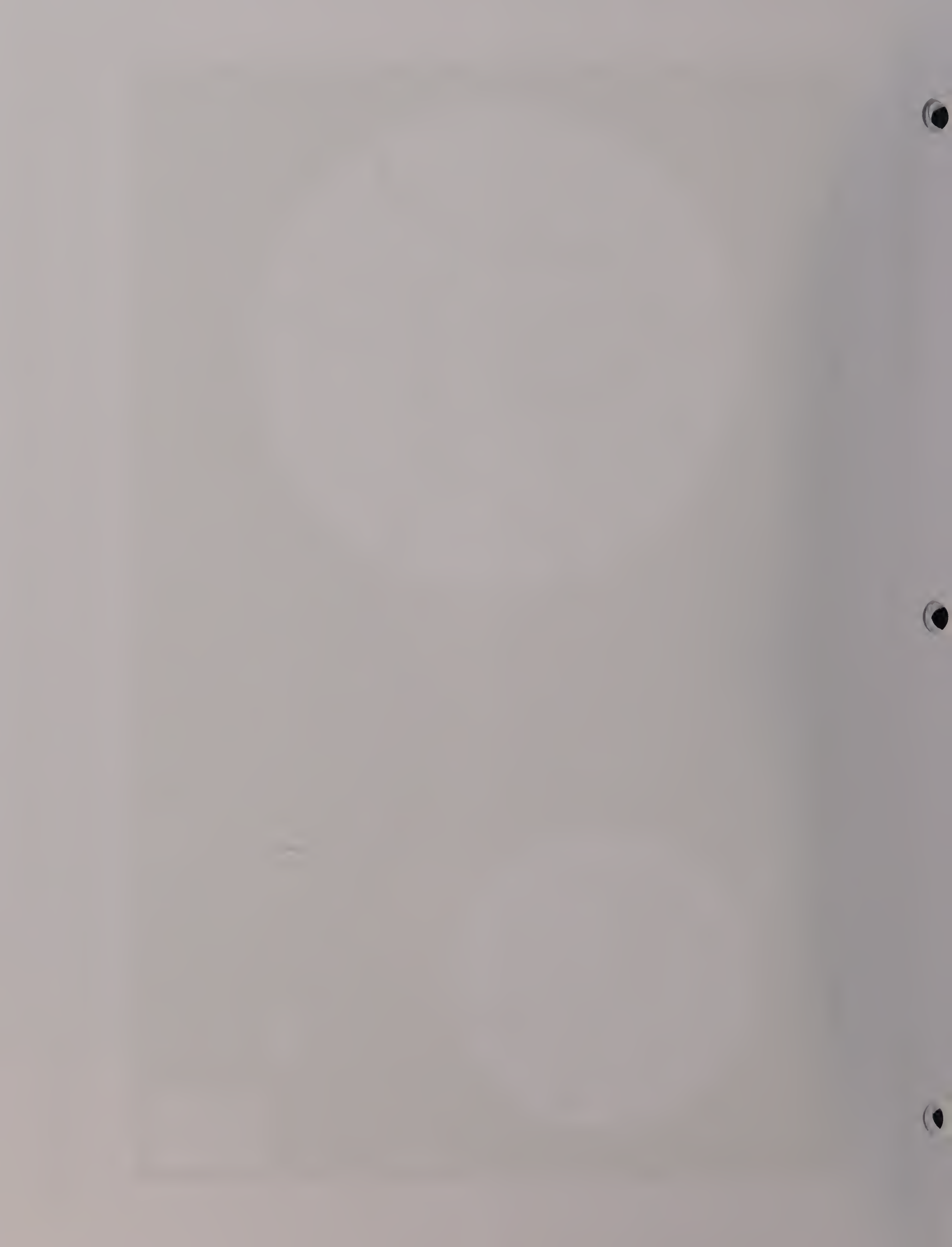
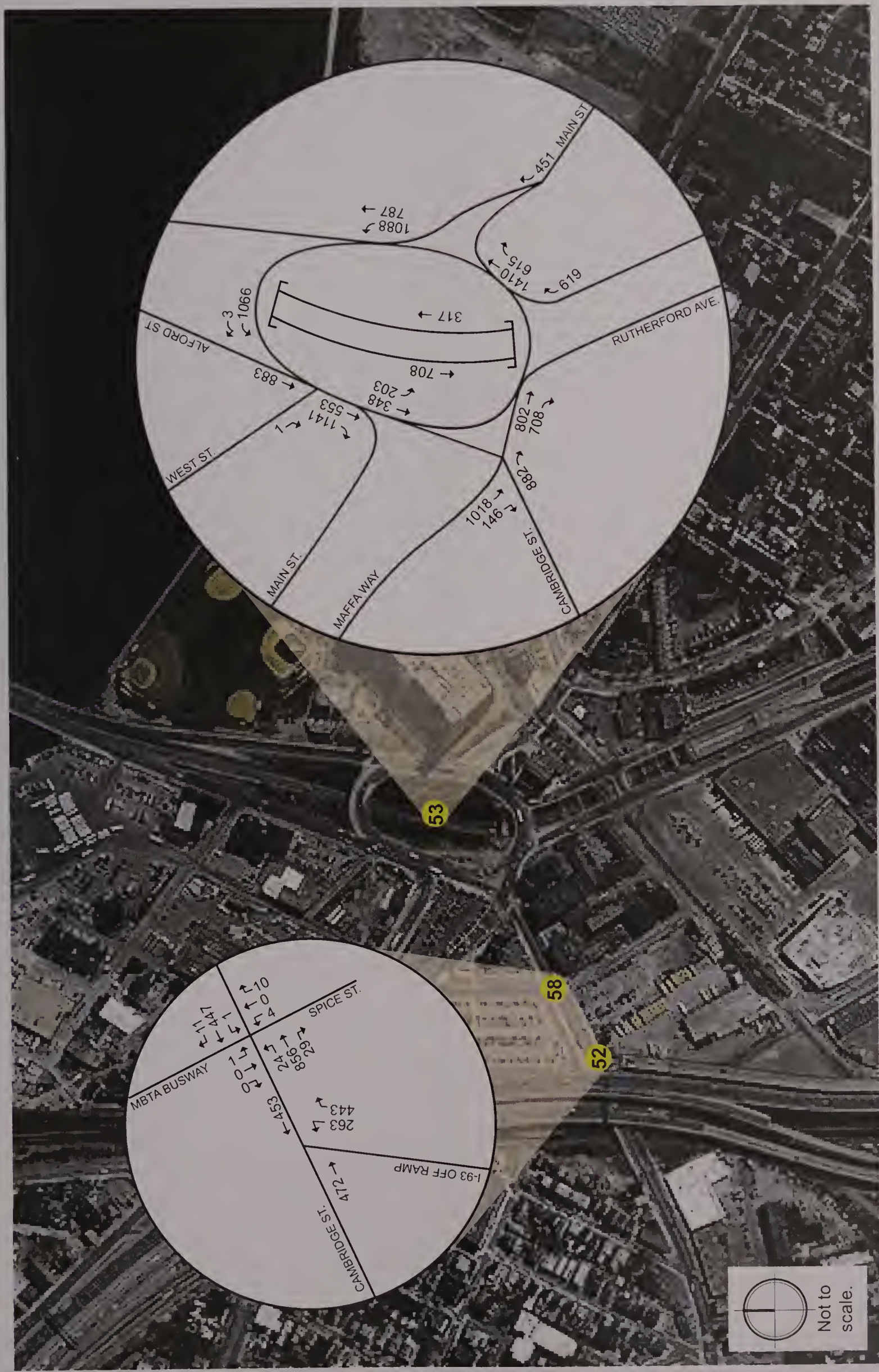


Figure 2-68
Existing (2014) Conditions Friday Peak Hour Traffic Volumes (4:30-5:30 p.m.), Sullivan Square Area, Boston
Source: Howard/Stein-Hudson Associates, Inc., 2015

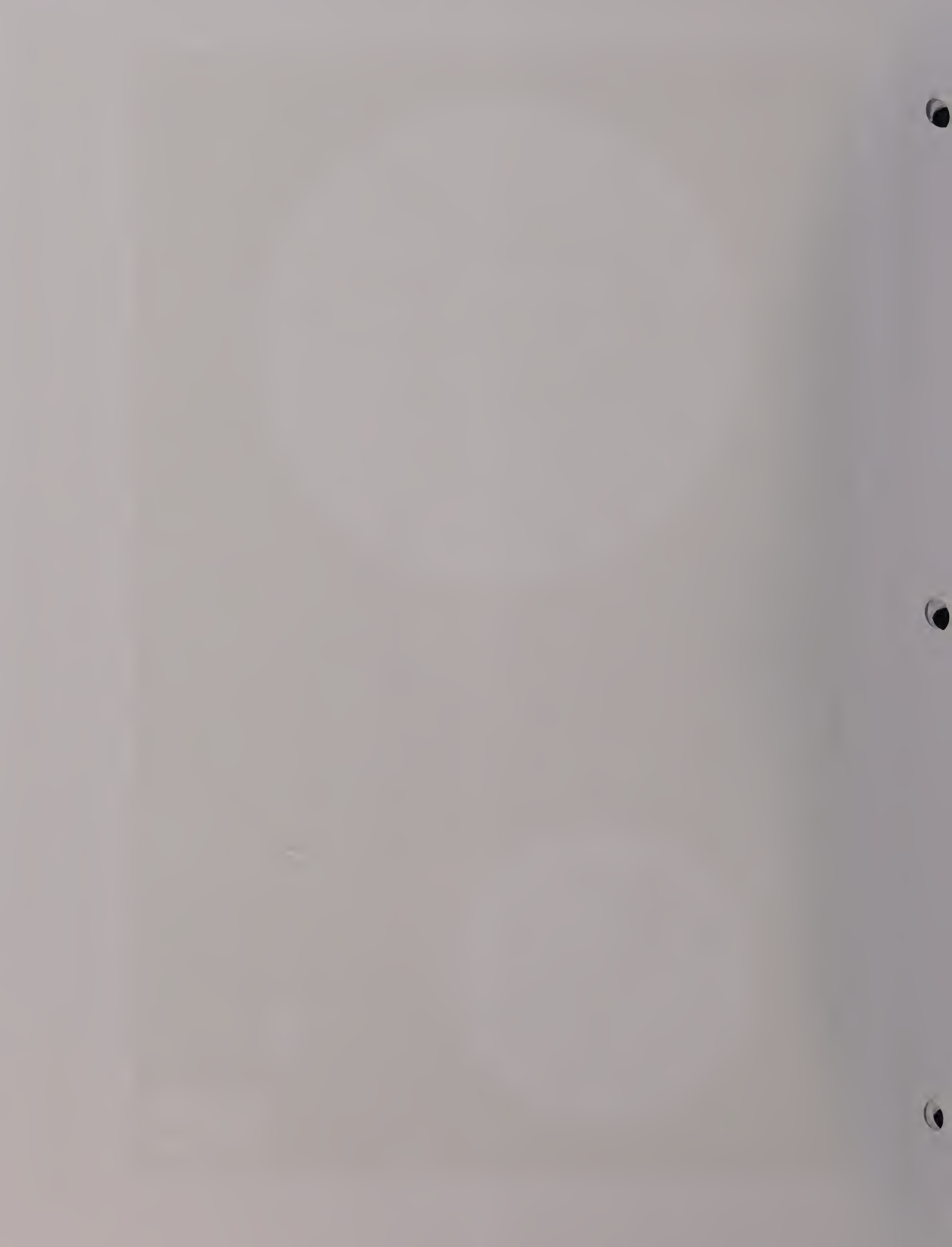
Wynn Resort in Everett
Everett, Massachusetts





Wynn Resort in Everett
Everett, Massachusetts

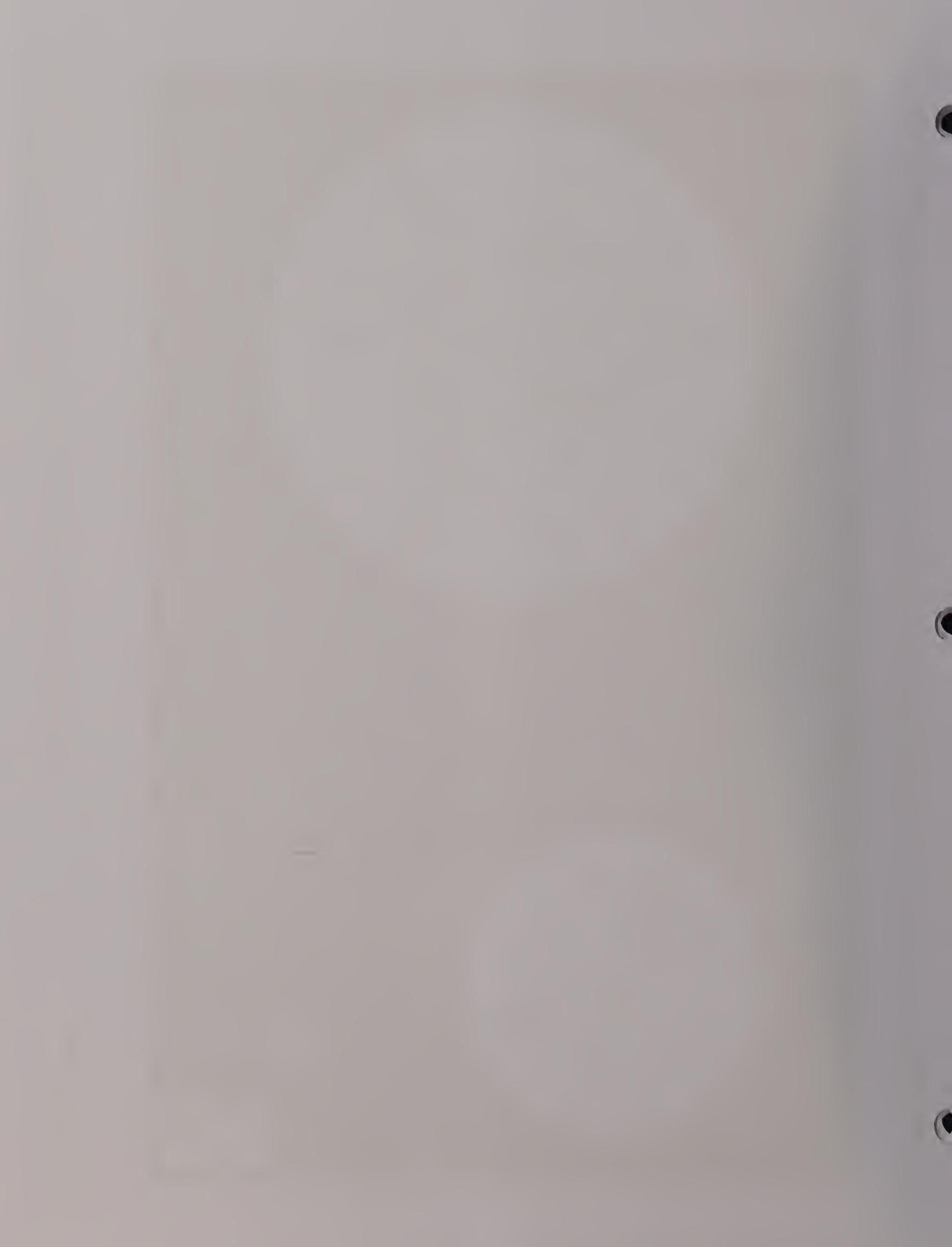
Figure 2-69
Existing (2014) Conditions Saturday Peak Hour Traffic Volumes (2:45-3:45 p.m.), Sullivan Square Area, Boston
Source: Howard/Stein-Hudson Associates, Inc., 2015

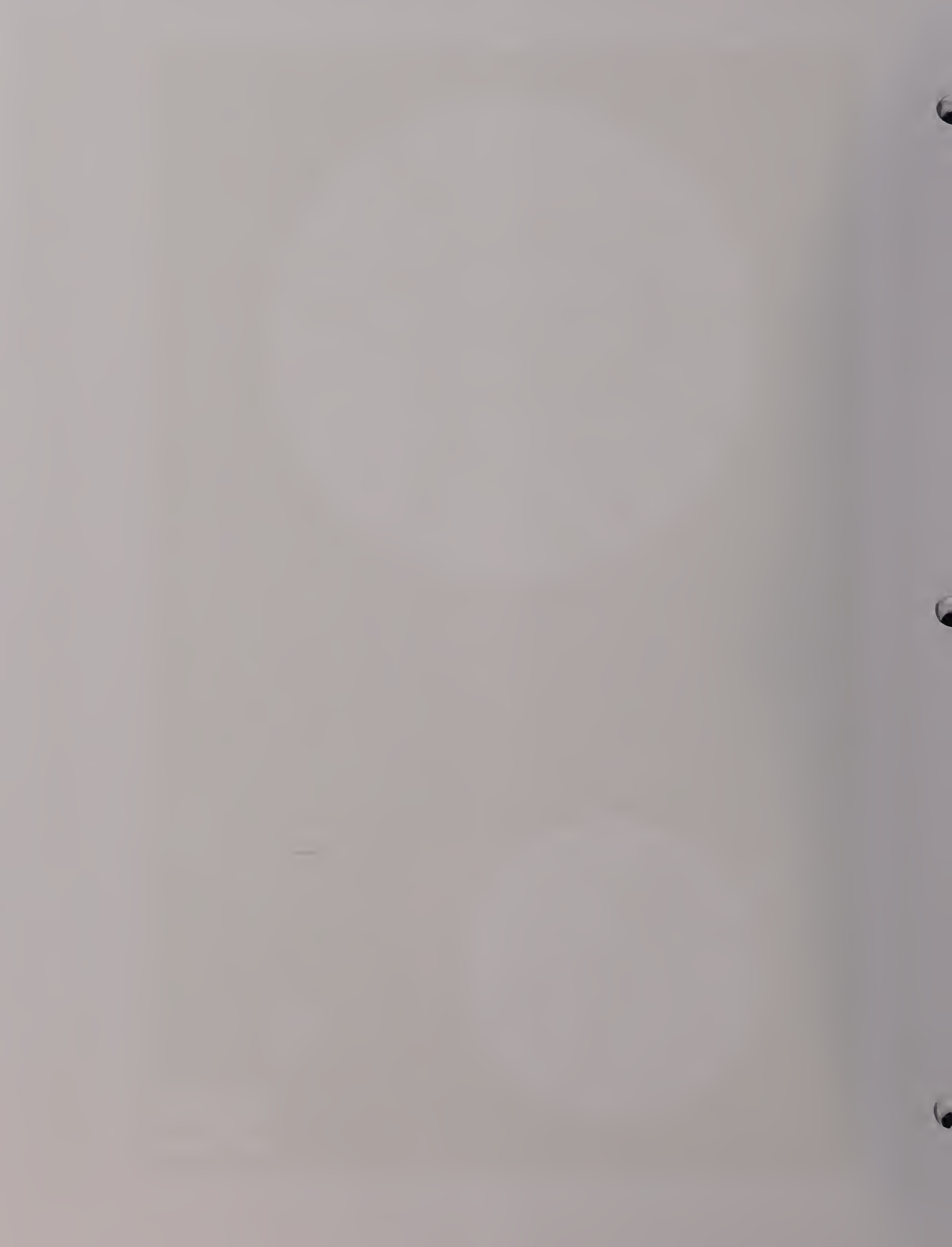




Wynn Resort in Everett
Everett, Massachusetts

Figure 2-70
No Build (2023) Conditions Friday Peak Hour Traffic Volumes, Sullivan Square Area, Boston
Source: Howard/Stein-Hudson Associates, Inc., 2015





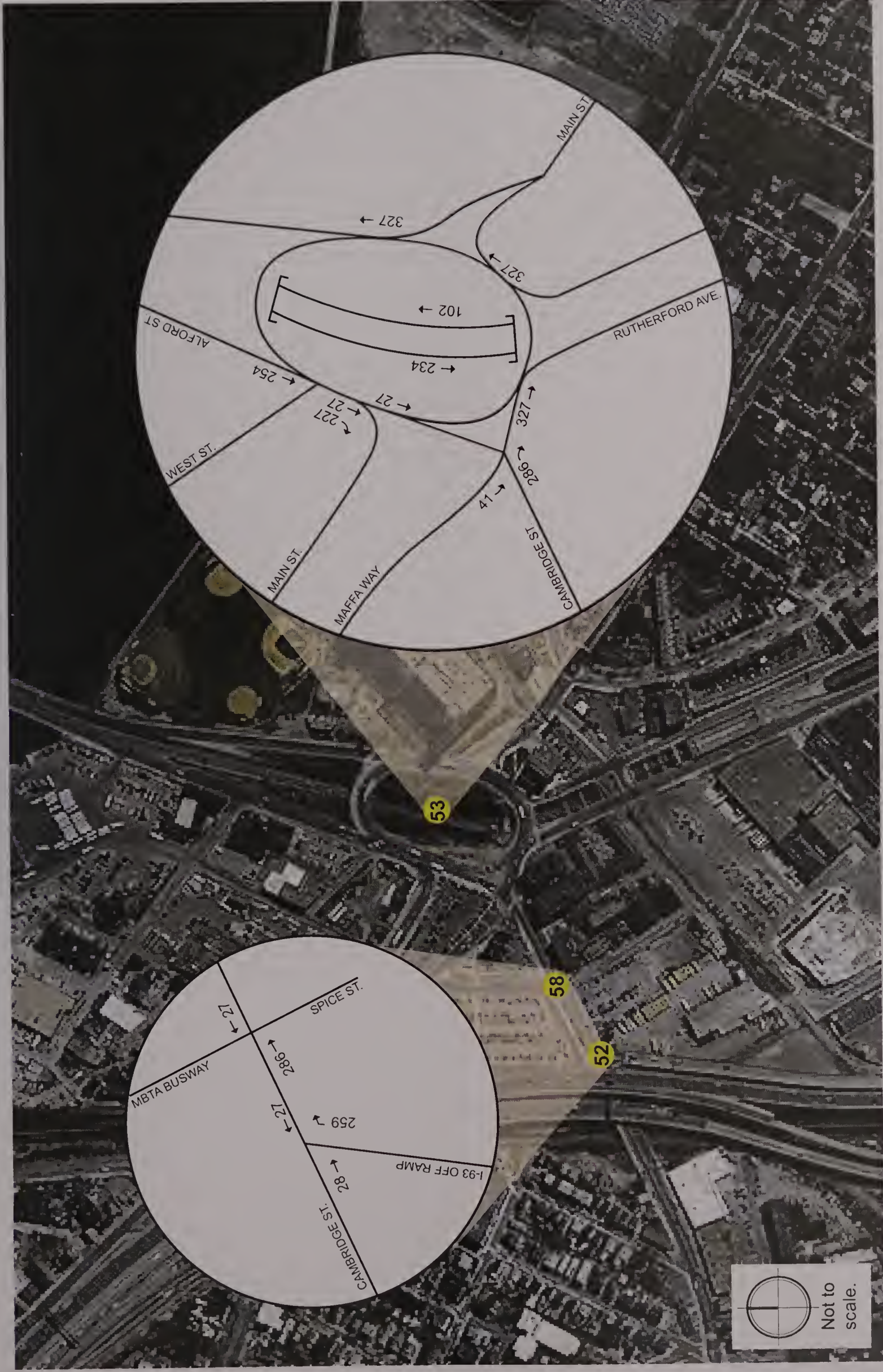
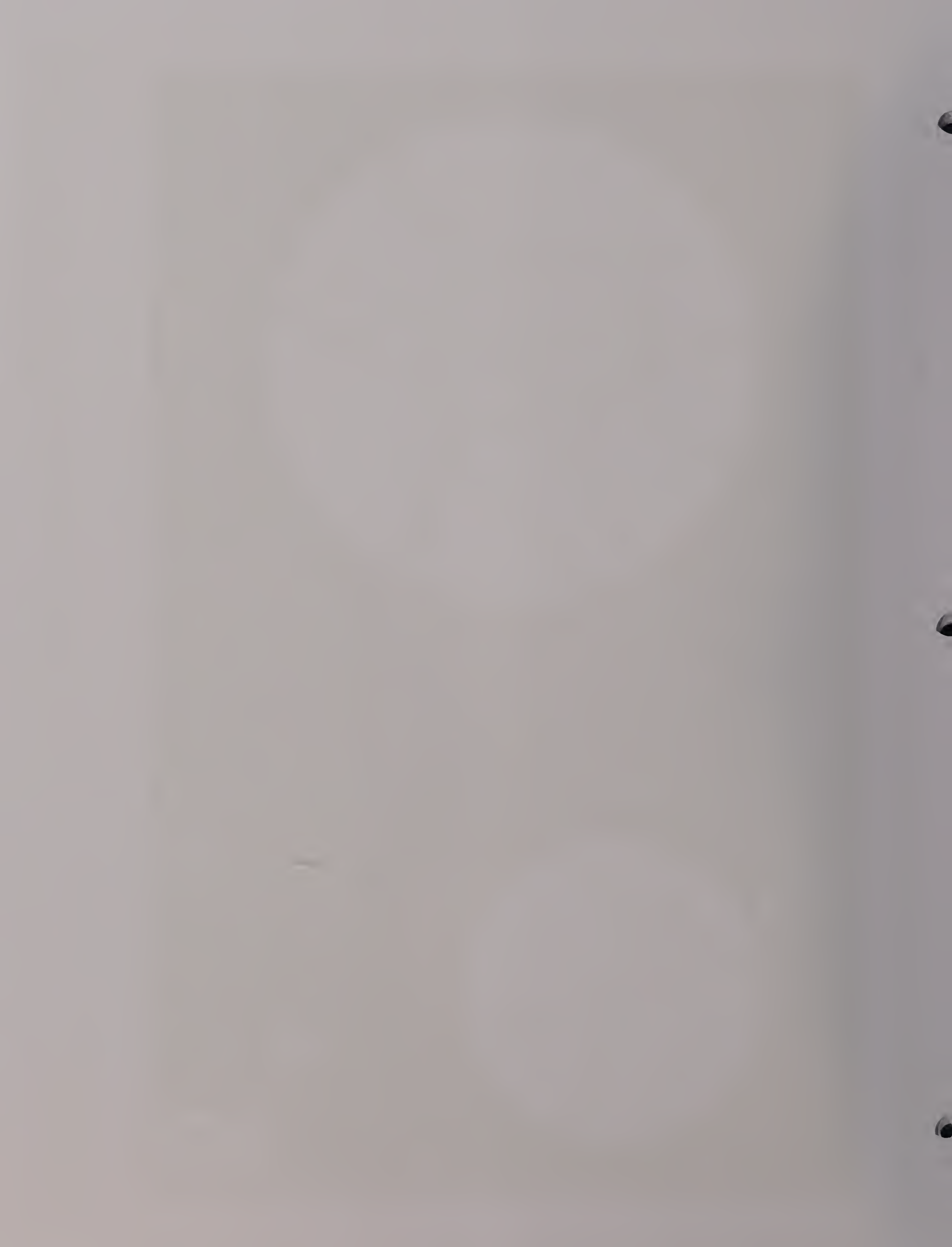


Figure 2-72
 Friday p.m. Peak Hour Project-generated Trips, Sullivan Square Area, Boston
 Source: Howard/Stein-Hudson Associates, Inc., 2015



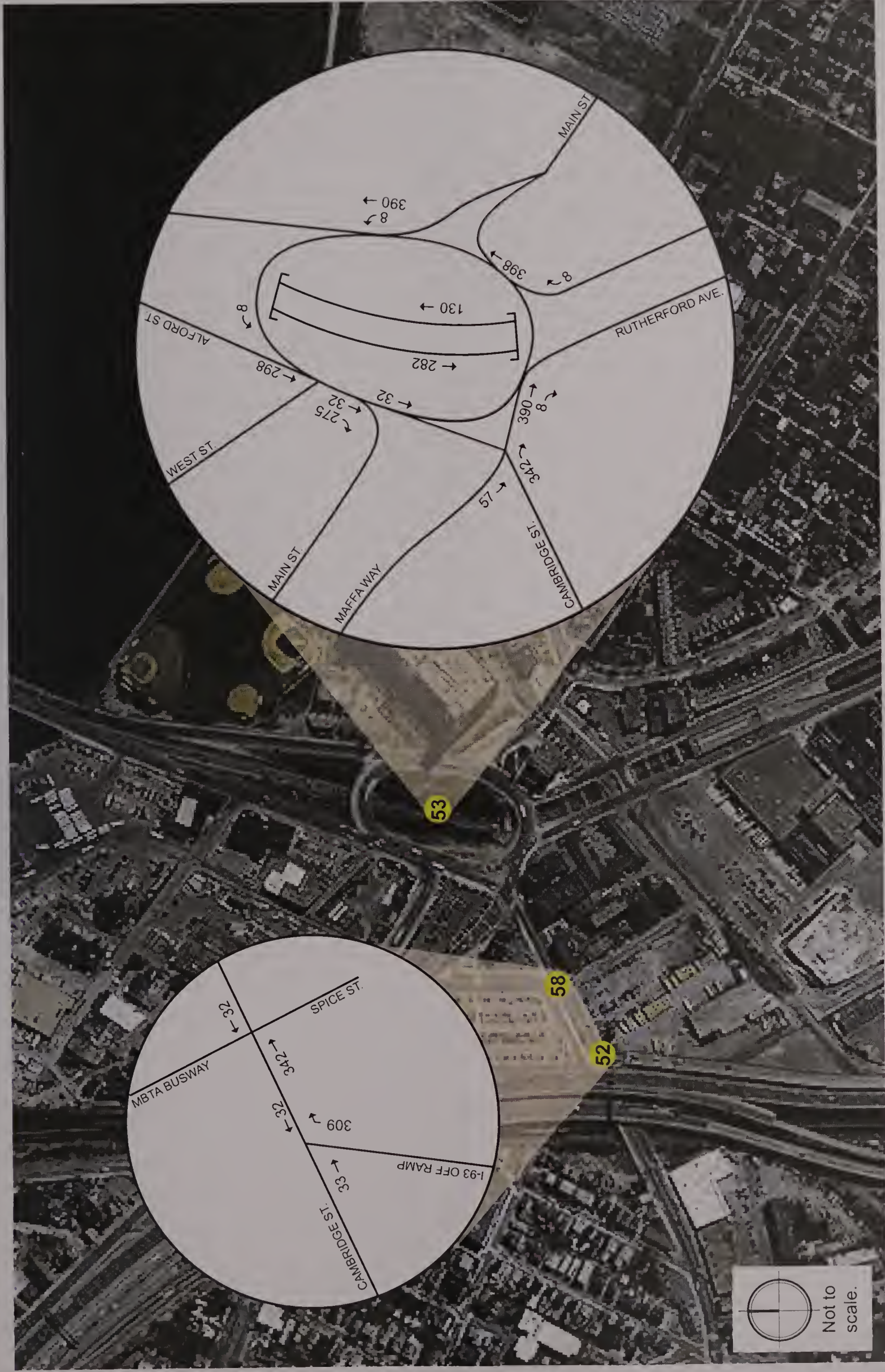
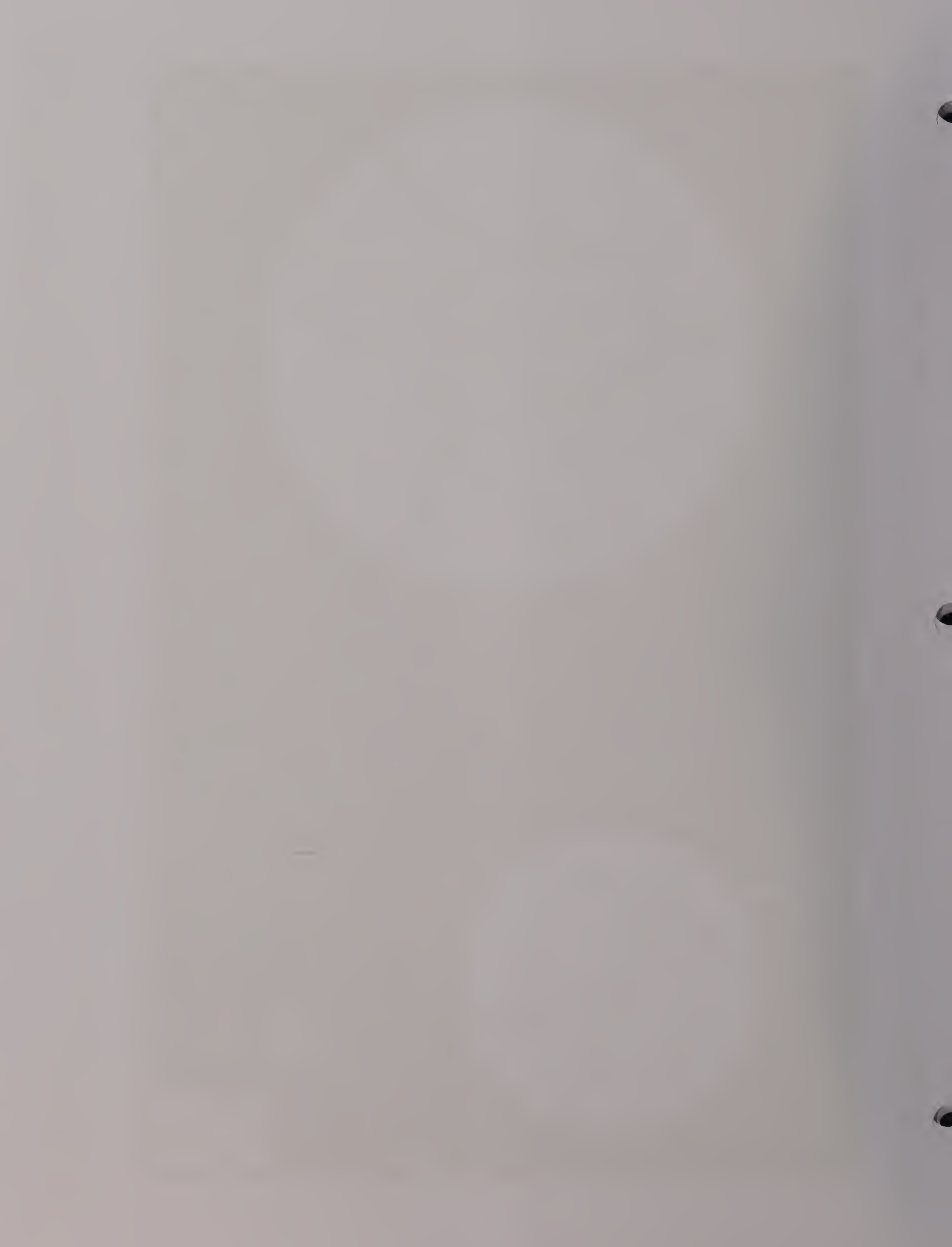
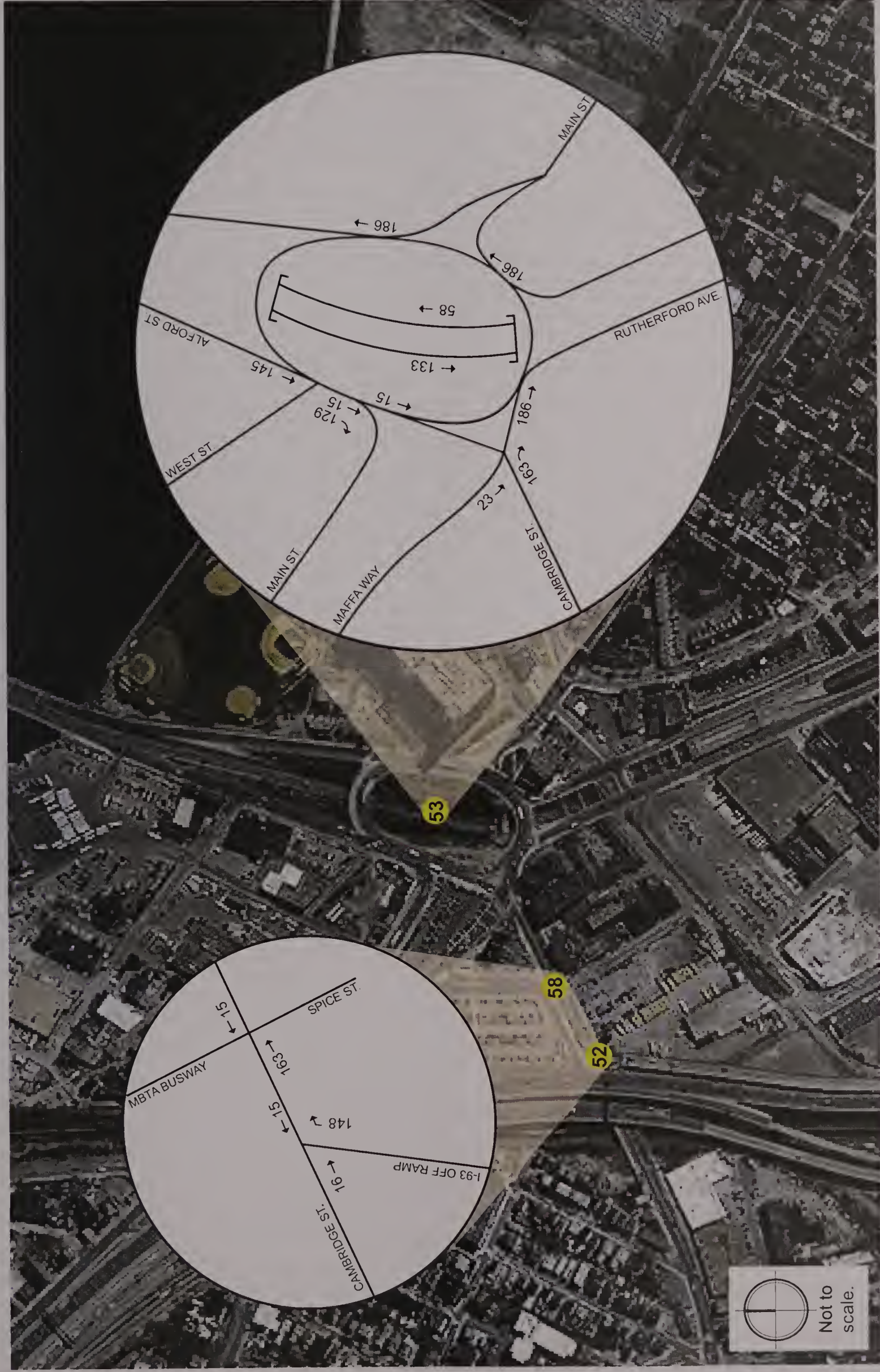


Figure 2-73
 Saturday Afternoon Peak Hour Project-generated Trips, Sullivan Square Area, Boston
 Source: Howard/Stein-Hudson Associates, Inc., 2015

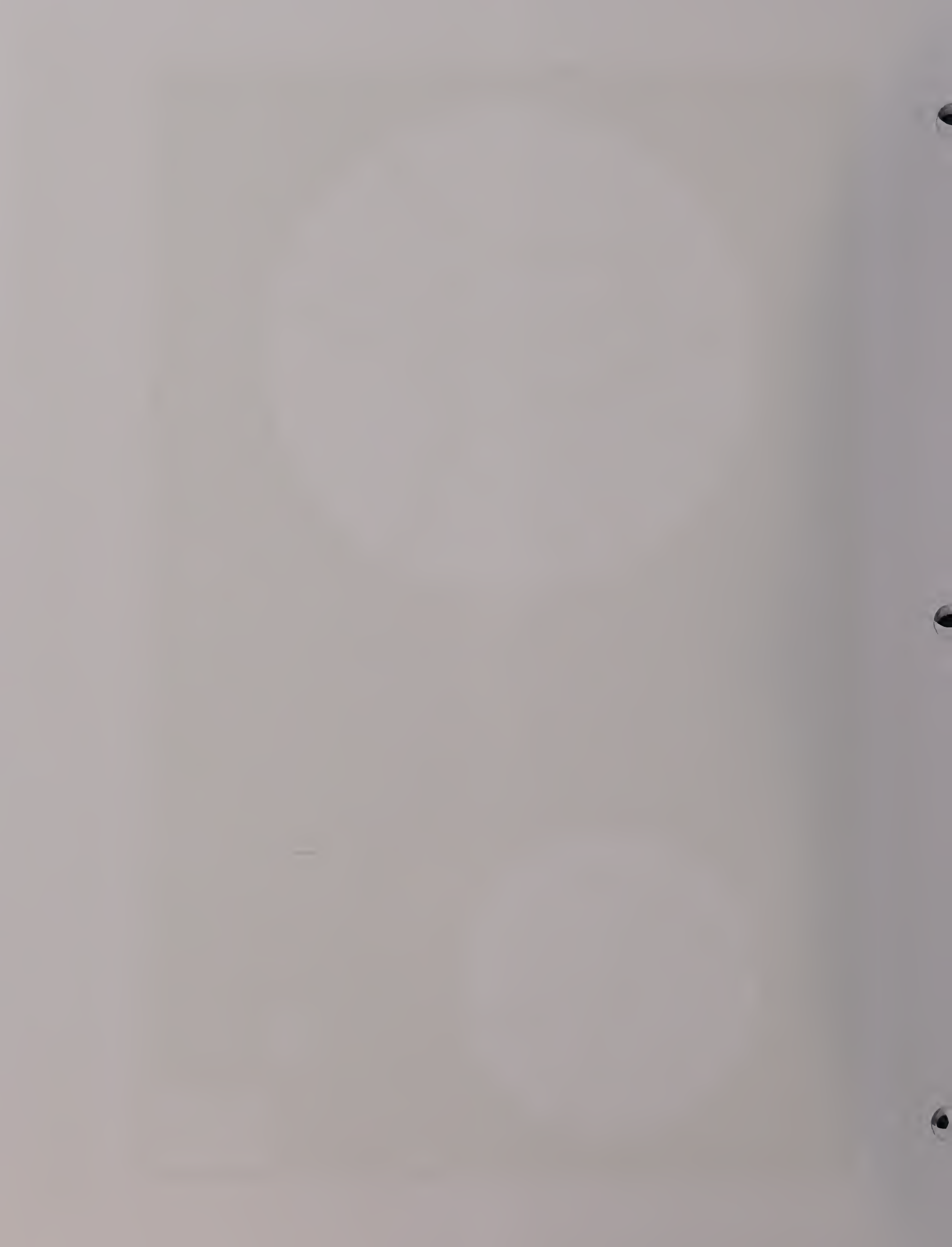
Wynn Resort in Everett
 Everett, Massachusetts

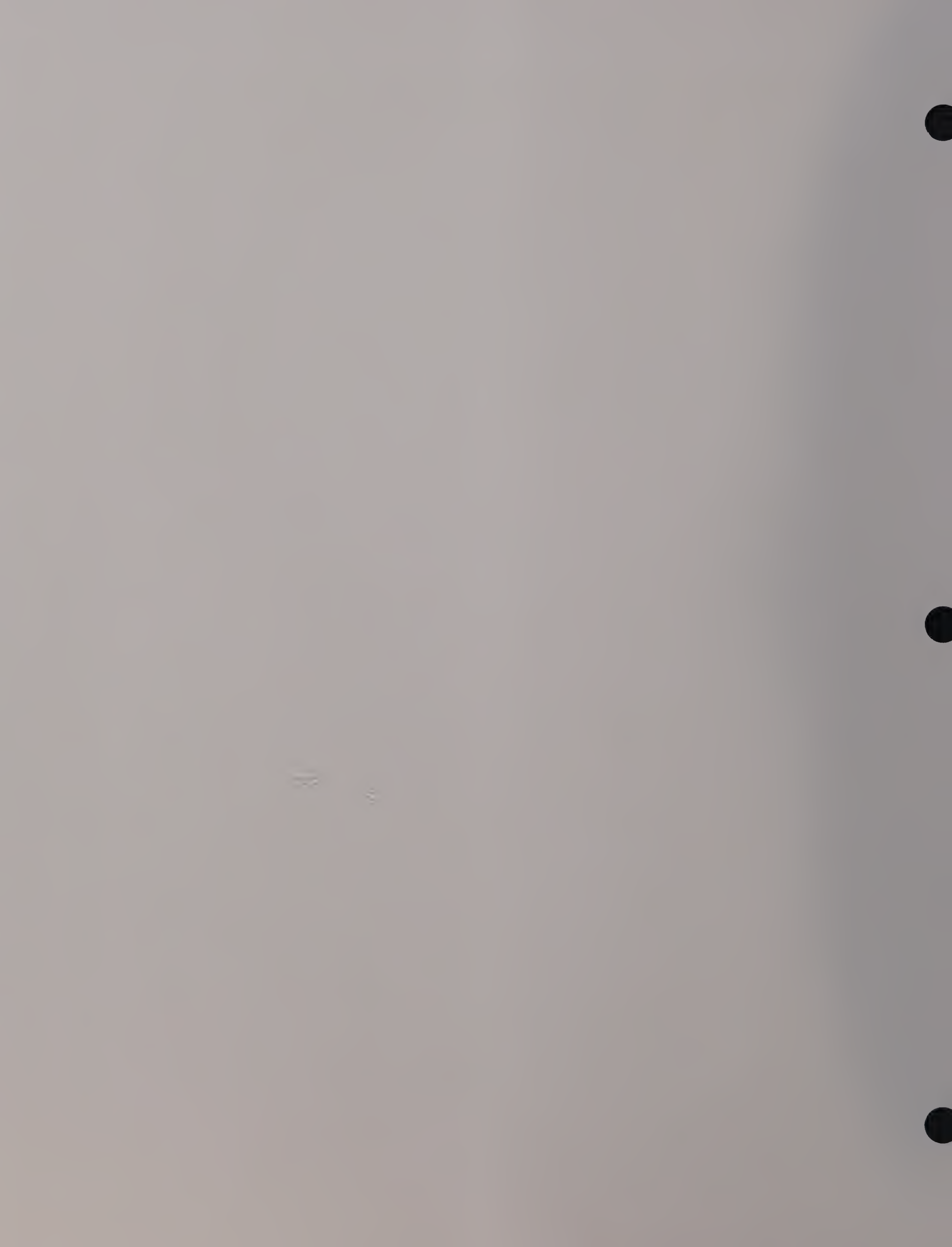


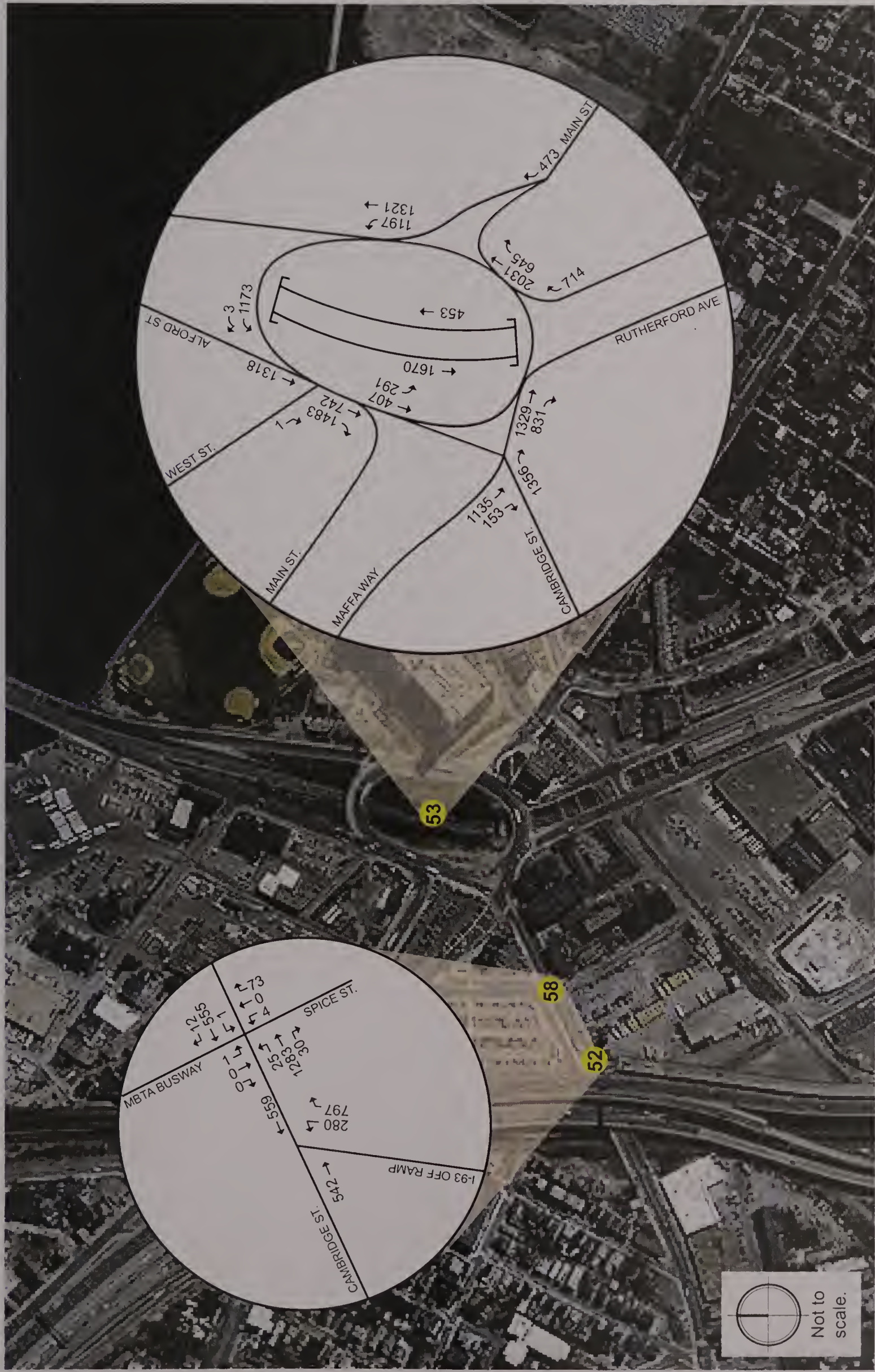


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Everett, Massachusetts

Figure 2-74
Friday p.m. "Real" Peak Hour Project-generated Trips, Sullivan Square Area, Boston
Source: Howard/Stein-Hudson Associates, Inc., 2015

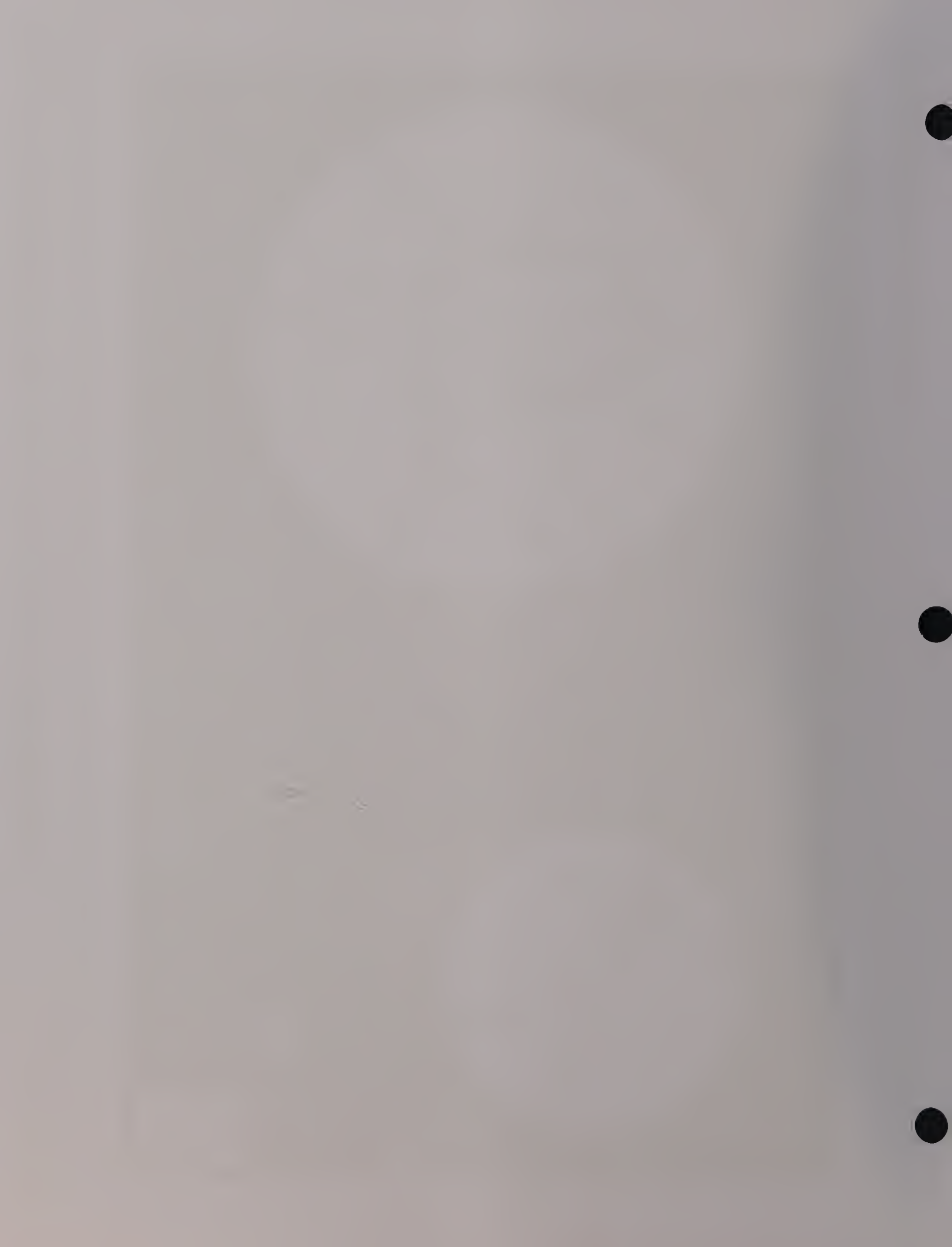






Wynn Resort in Everett
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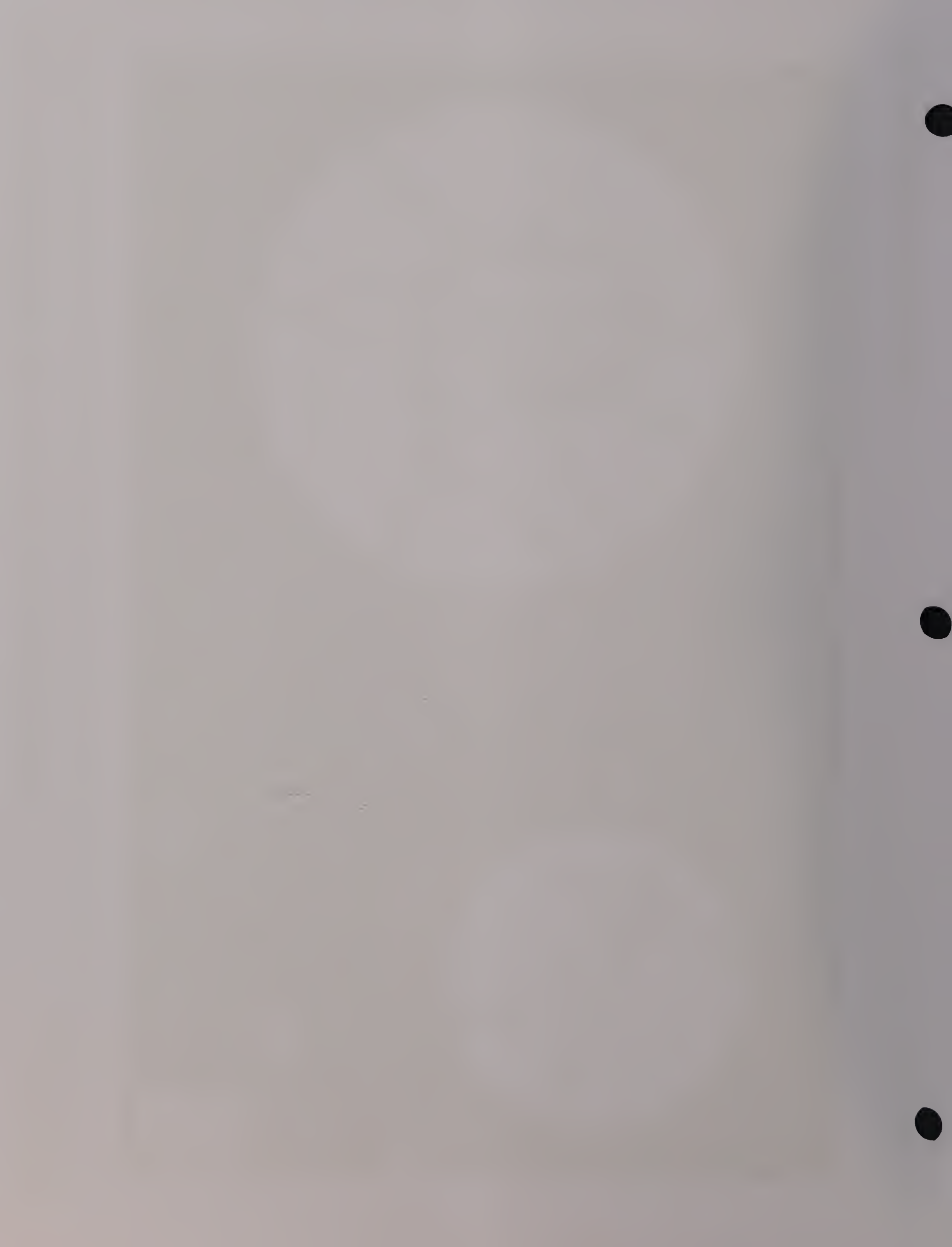
Figure 2-76
Build (2023) Conditions Saturday Afternoon Peak Hour Traffic Volumes, Sullivan Square Area, Boston
Source: Howard/Stein-Hudson Associates, Inc., 2015

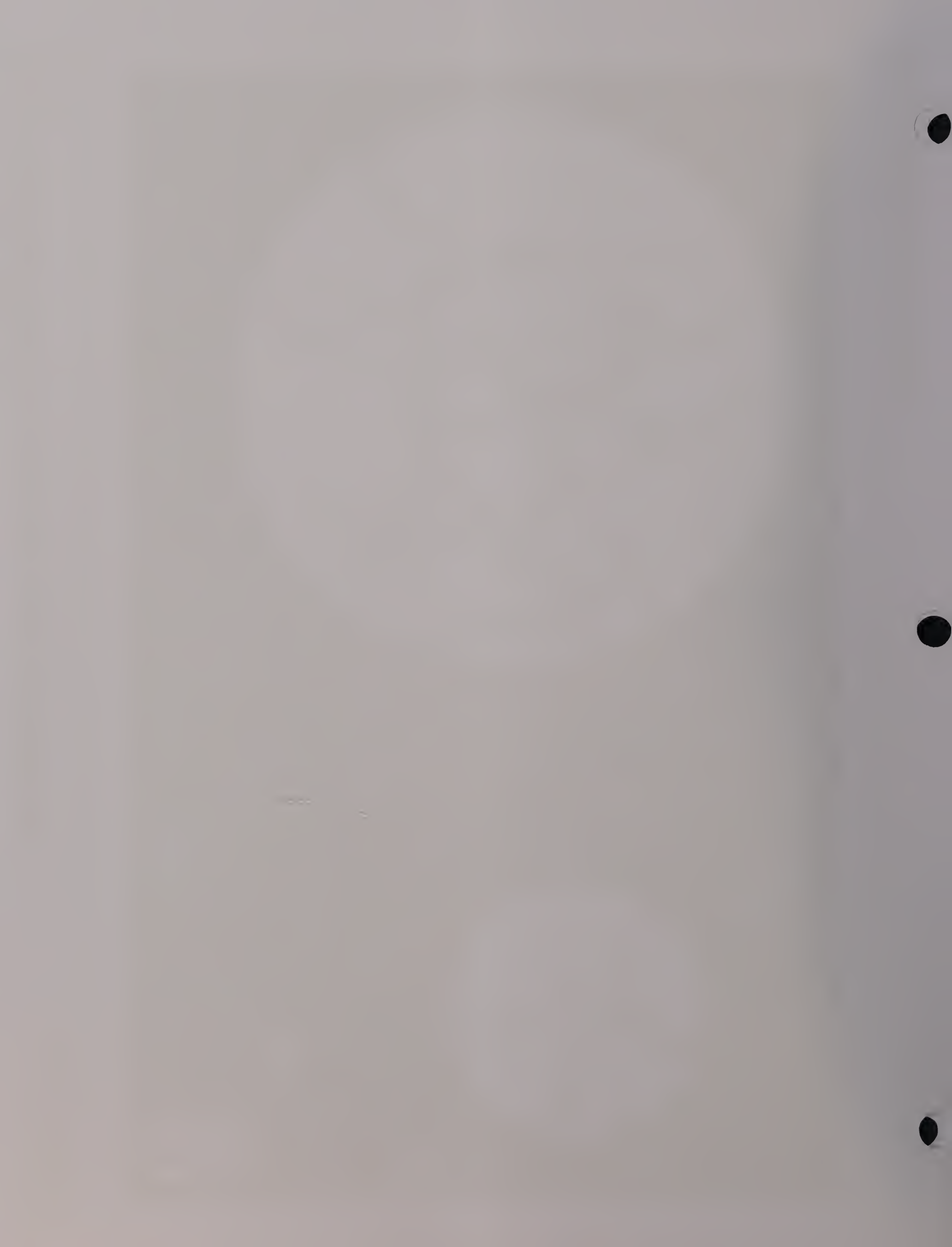




Wynn Resort in Everett
Everett, Massachusetts

Figure 2-77
Build (2023) Conditions Friday "Real" Peak Hour Traffic Volumes, Sullivan Square Area, Boston
Source: Howard/Stein-Hudson Associates, Inc., 2015







Wynn Resort in Everett
Everett, Massachusetts

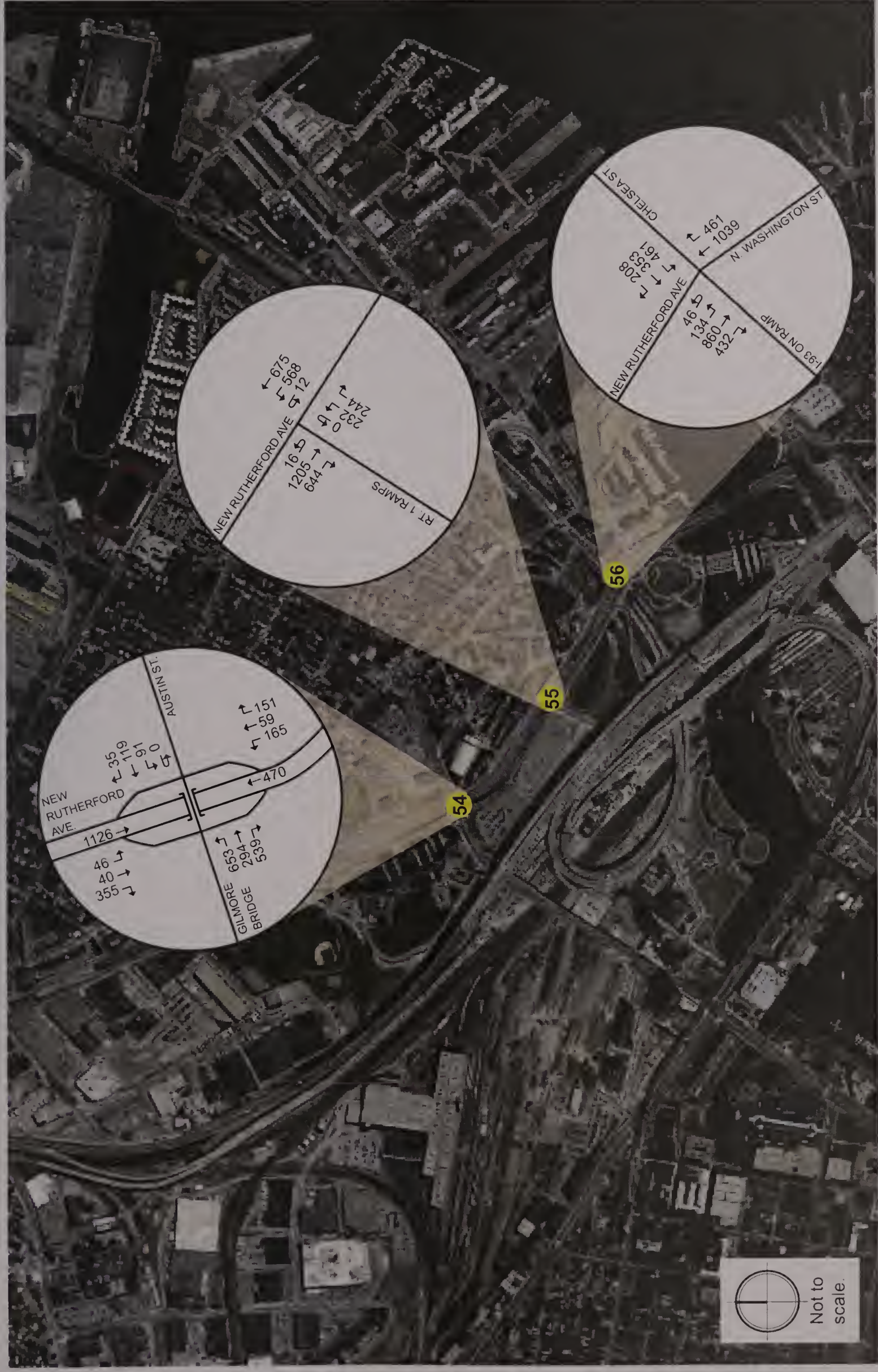
Figure 2-79
Build Mitigated (2023) Conditions Saturday Peak Hour Traffic Volumes, Sullivan Square Area, Boston
Source: Howard/Stein-Hudson Associates, Inc., 2015





Wynn Resort in Everett
Everett, Massachusetts

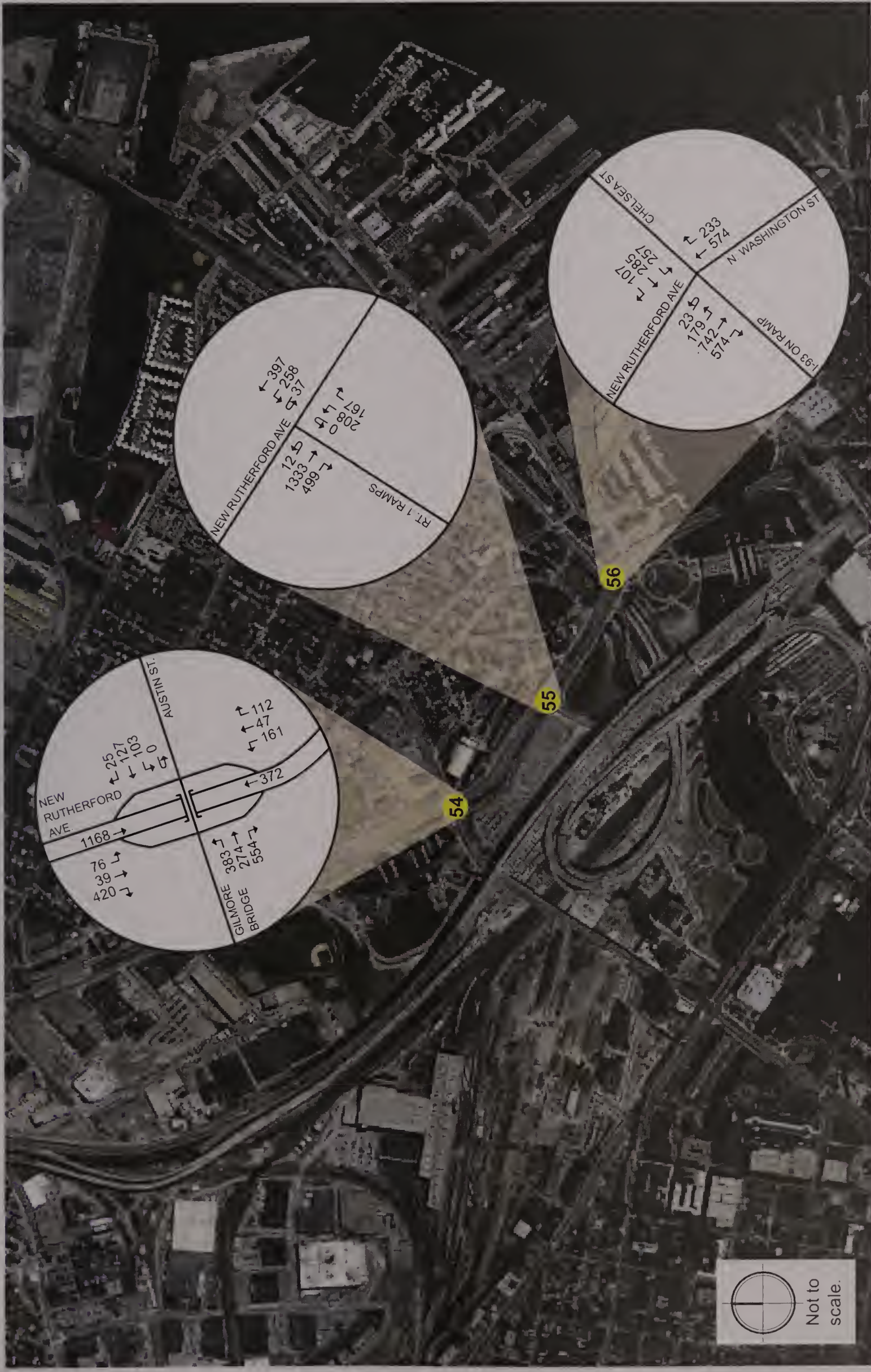
Figure 2-80
Build Mitigated (2023) Conditions Friday "Real" Peak Hour Traffic Volumes, Sullivan Square Area, Boston
Source: Howard/Stein-Hudson Associates, Inc., 2015



Wynn Resort in Everett
Everett, Massachusetts

Figure 2-81
Existing (2014) Conditions Friday Peak Hour Traffic Volumes (4:30-5:30 p.m.), Rutherford Avenue, Boston
Source: Howard/Stein-Hudson Associates, Inc., 2015





Wynn Resort in Everett
Everett, Massachusetts

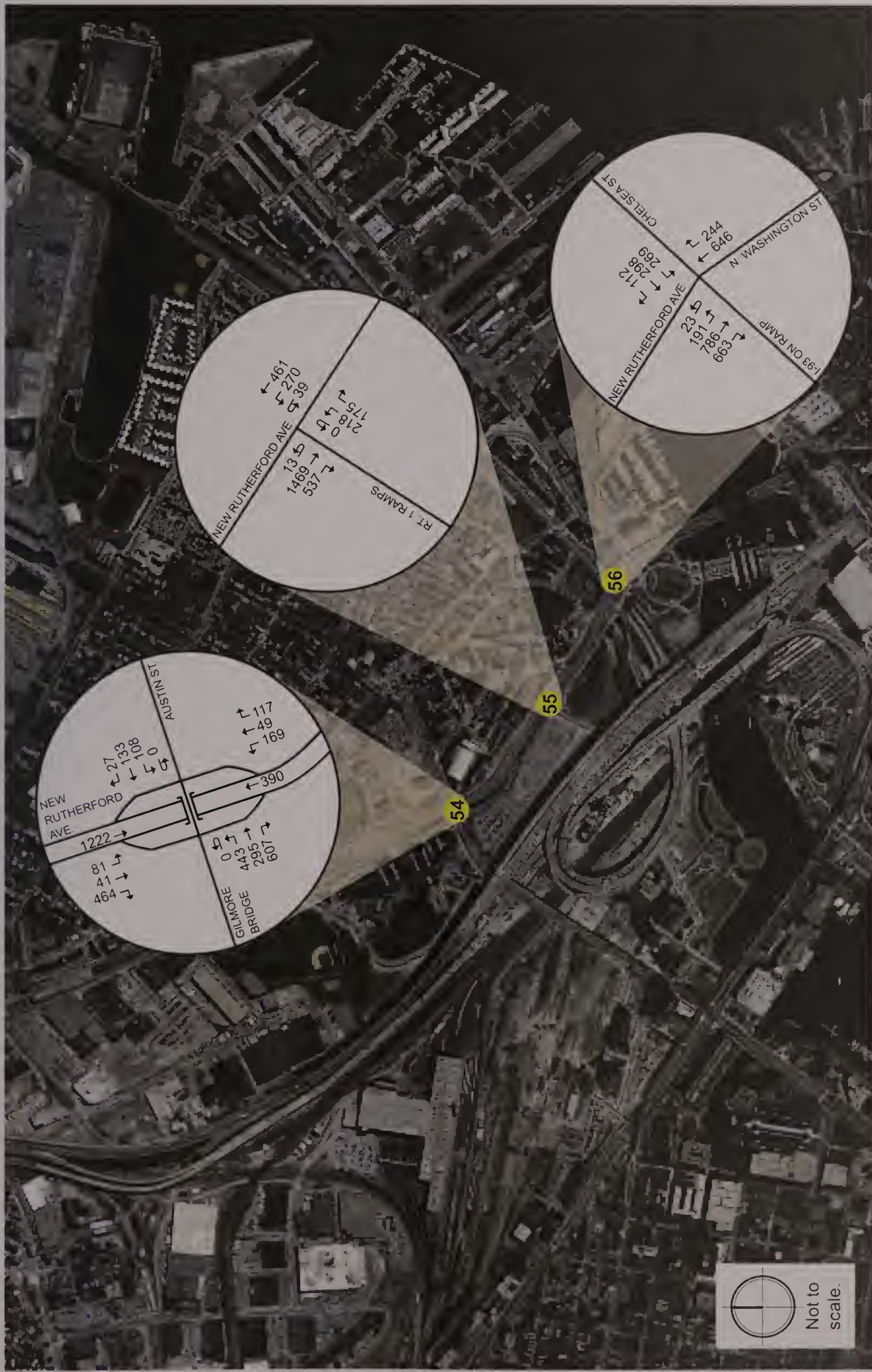
Figure 2-82
Existing (2014) Conditions Saturday Peak Hour Traffic Volumes (2:45-3:45 p.m.), Rutherford Avenue, Boston
Source: Howard/Stein-Hudson Associates, Inc., 2015



Wynn Resort in Everett
Everett, Massachusetts

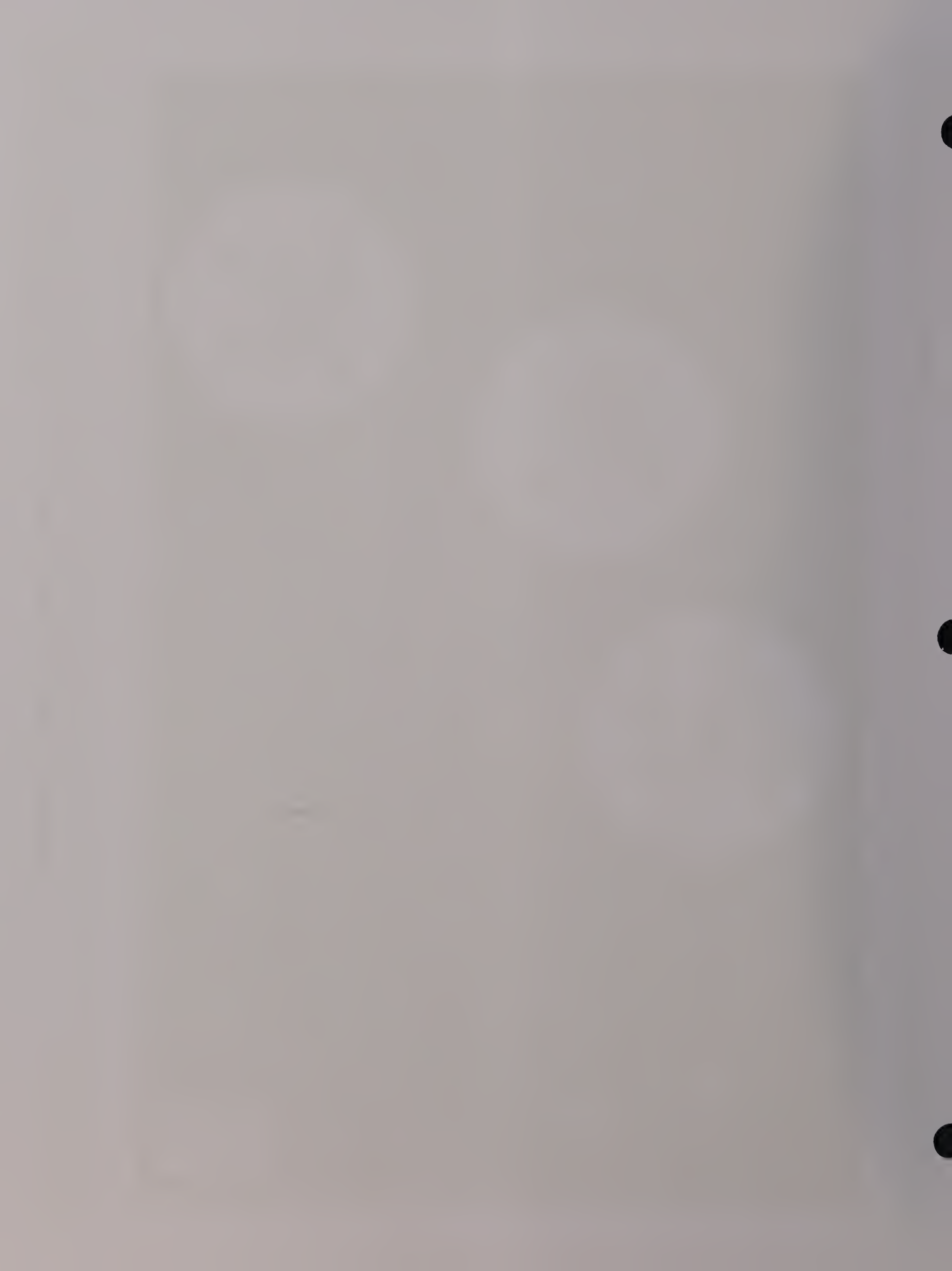
Figure 2-83
No Build (2023) Conditions Friday Peak Hour Traffic Volumes, Rutherford Avenue, Boston
Source: Howard/Stein-Hudson Associates, Inc., 2015

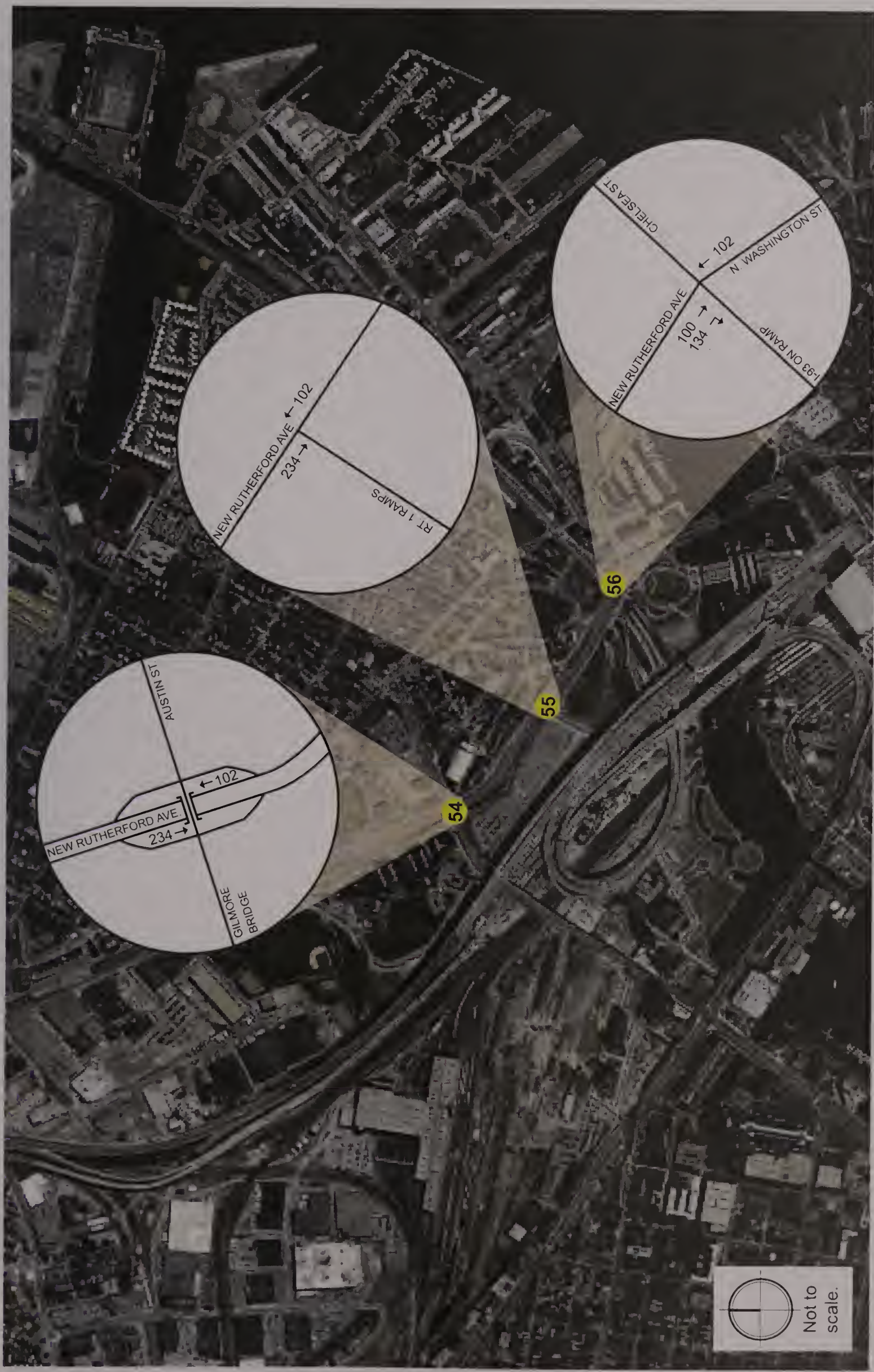




Wynn Resort in Everett
Everett, Massachusetts

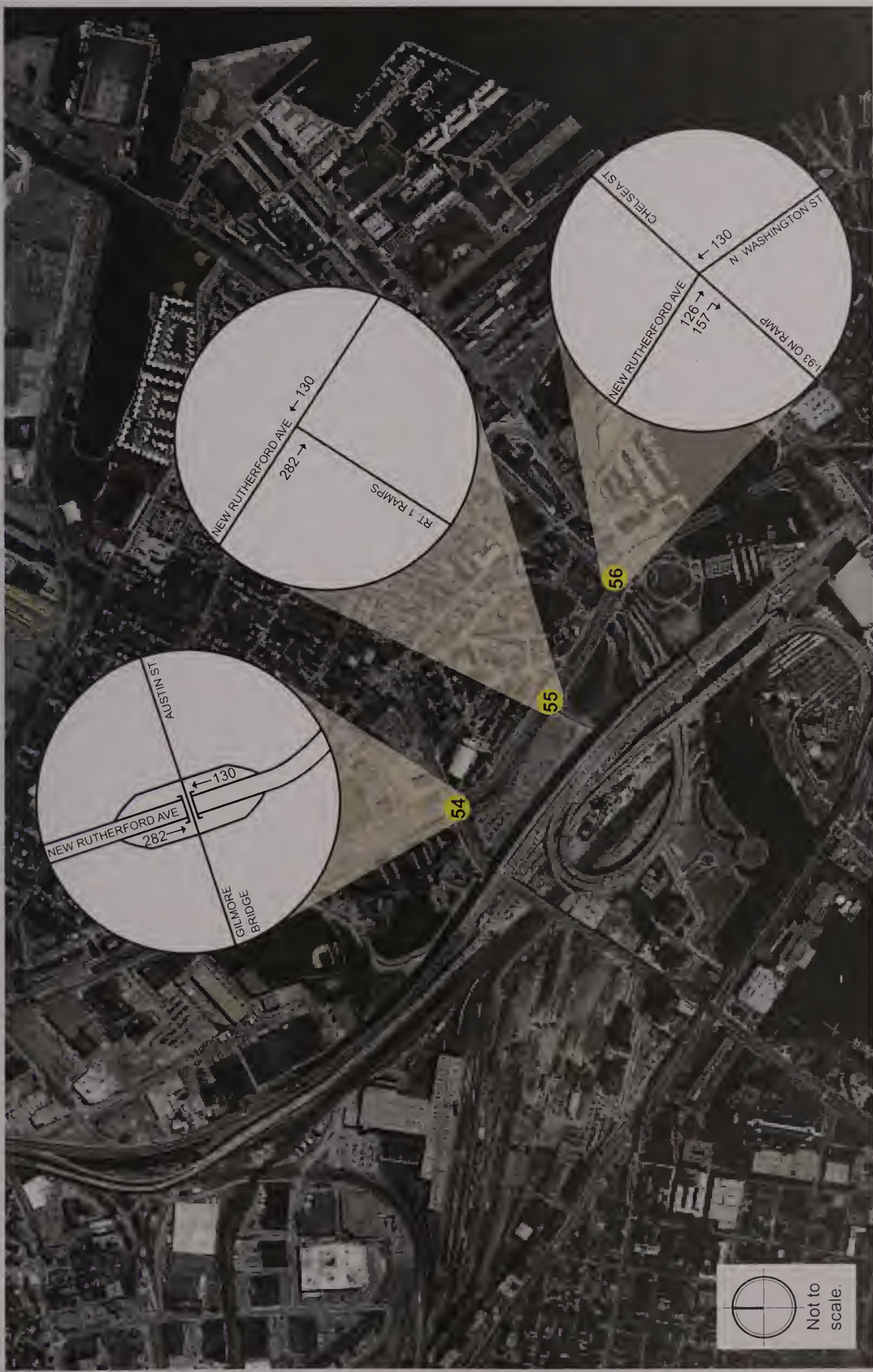
Figure 2-84
No Build (2023) Conditions Saturday Afternoon Peak Hour Traffic Volumes, Rutherford Avenue, Boston
Source: Howard/Stein-Hudson Associates, Inc., 2015





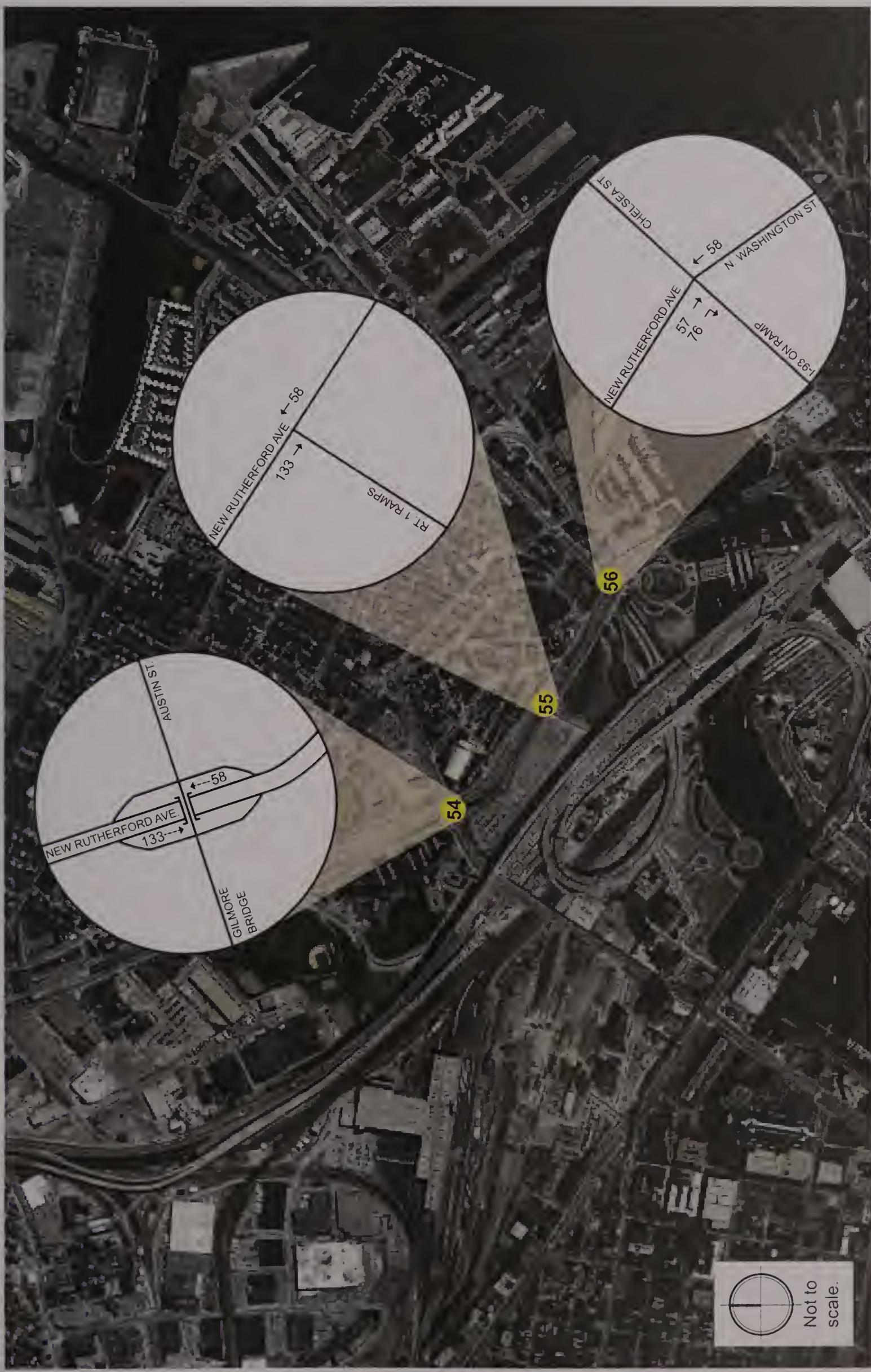
Wynn Resort in Everett
Everett, Massachusetts

Figure 2-85
Friday p.m. Peak Hour Project-generated Trips, Rutherford Avenue, Boston
Source: Howard/Stein-Hudson Associates, Inc., 2015



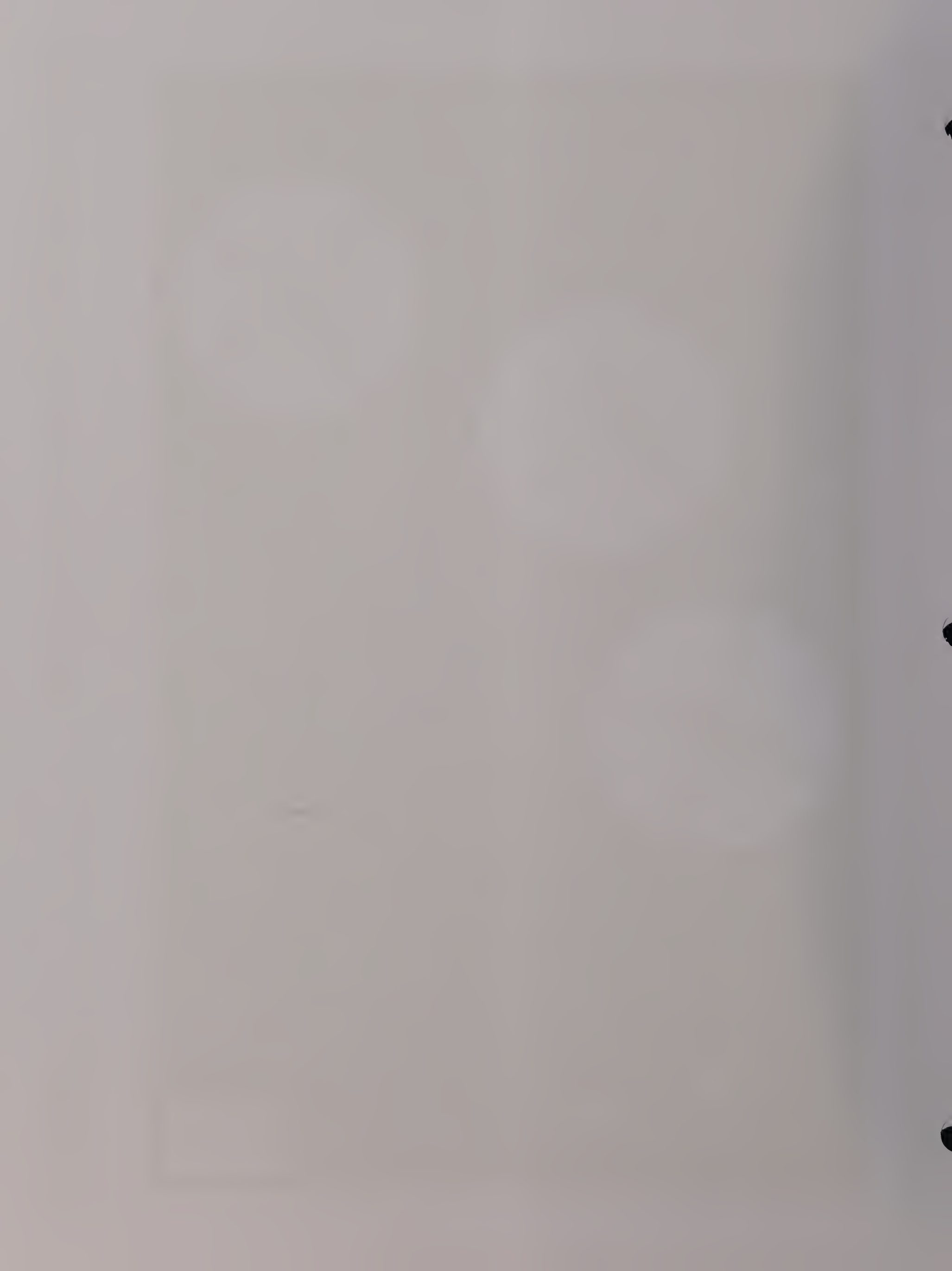
Wynn Resort in Everett
Everett, Massachusetts

Figure 2-86
Saturday Afternoon Peak Hour Project-generated Trips, Rutherford Avenue, Boston
Source: Howard/Stein-Hudson Associates, Inc., 2015



Wynn Resort in Everett
Everett, Massachusetts

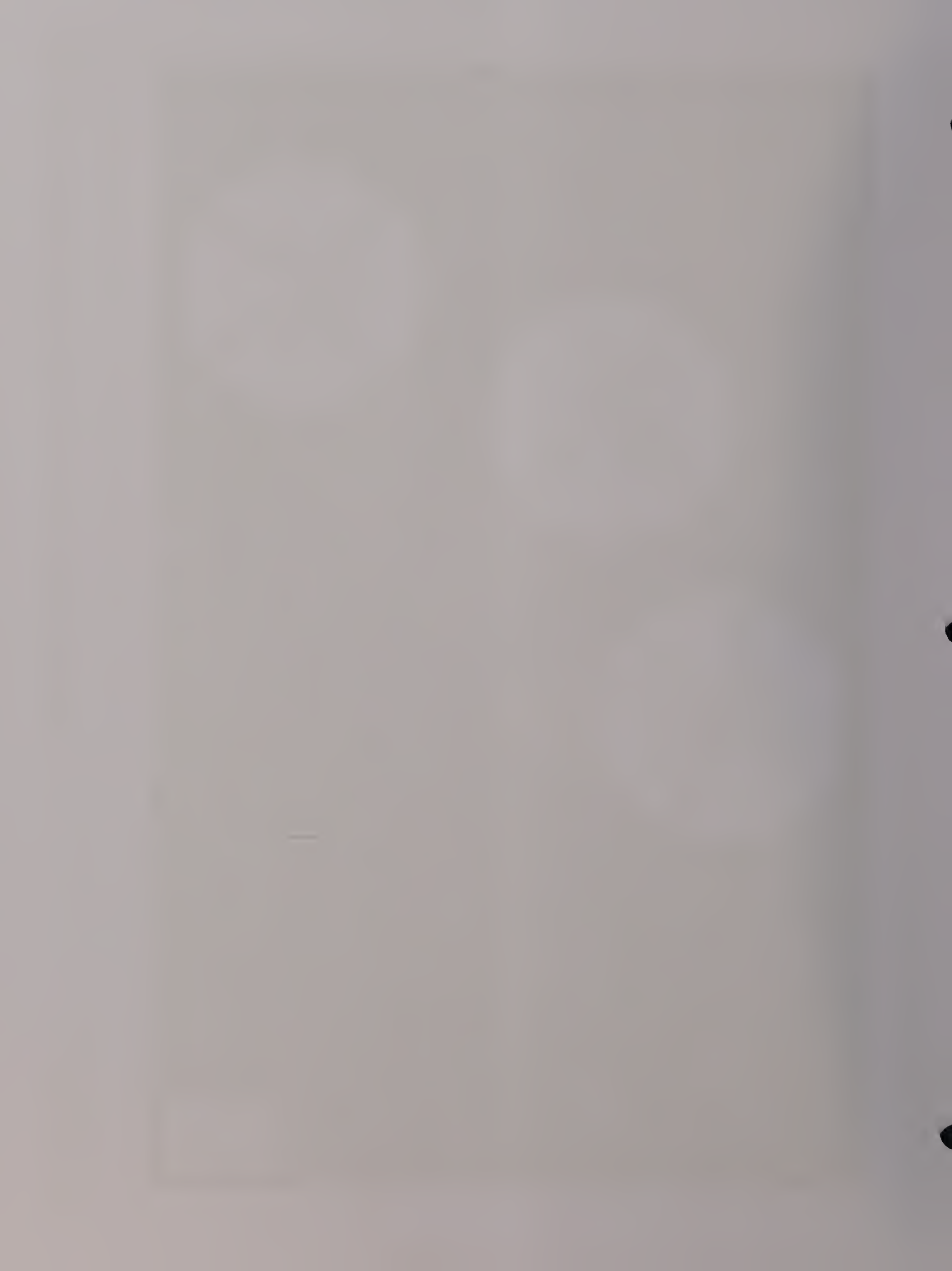
Figure 2-87
Friday p.m. "Real" Peak Hour Project-generated Trips, Rutherford Avenue, Boston
Source: Howard/Stein-Hudson Associates, Inc., 2015





Wynn Resort in Everett
Everett, Massachusetts

Figure 2-88
Build (2023) Conditions Friday Peak Hour Traffic Volumes, Rutherford Avenue, Boston
Source: Howard/Stein-Hudson Associates, Inc., 2015





Wynn Resort in Everett
Everett, Massachusetts

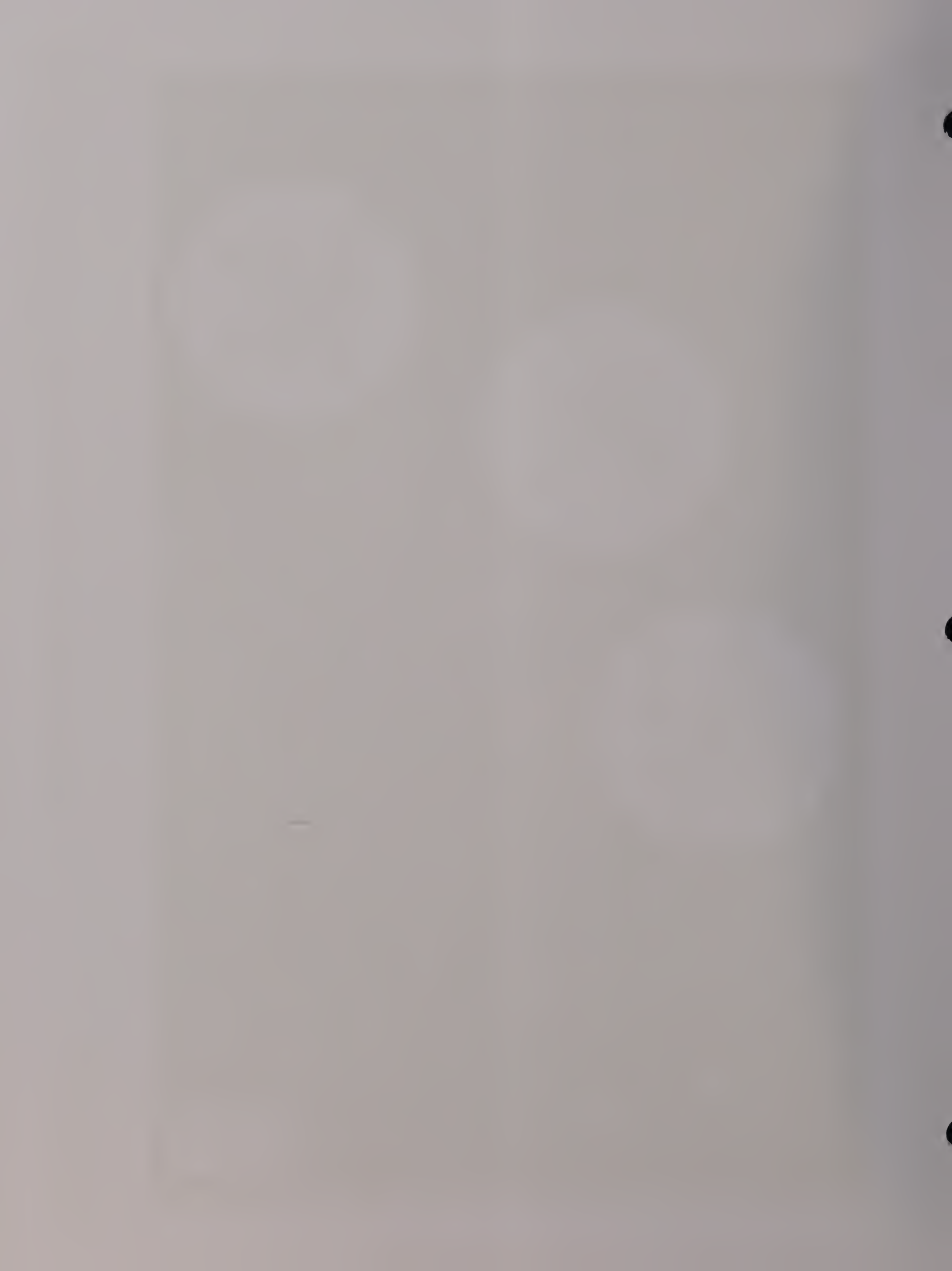
Figure 2-89
Build (2023) Conditions Saturday Afternoon Peak Hour Traffic Volumes, Rutherford Avenue, Boston
Source: Howard/Stein-Hudson Associates, Inc., 2015





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Everett, Massachusetts

Figure 2-90
Build (2023) Conditions Friday "Real" Peak Hour Traffic Volumes, Rutherford Avenue, Boston
Source: Howard/Stein-Hudson Associates, Inc., 2015



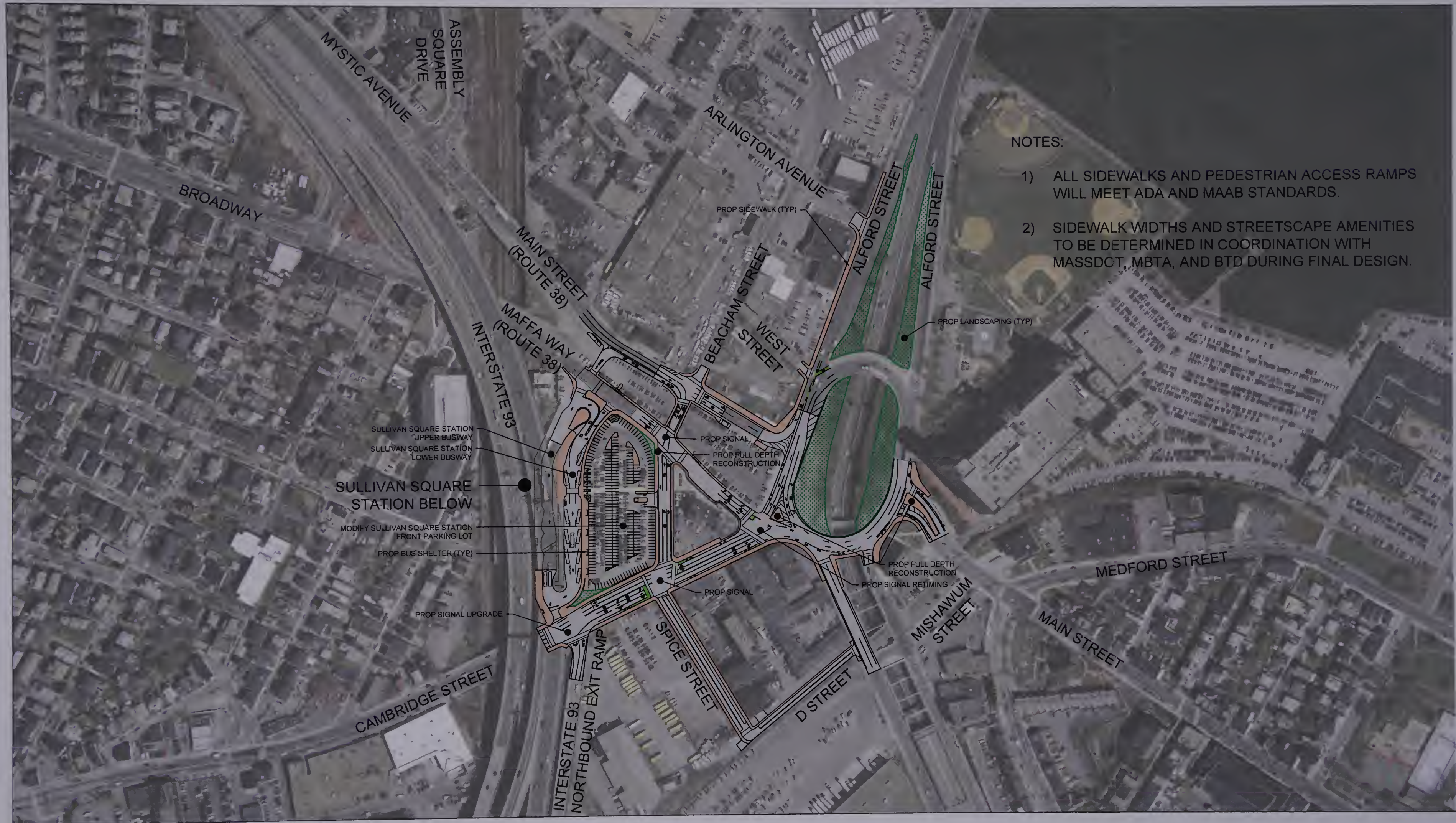






FIGURE 2-91B
FIGURE 2-91C

FIGURE 2-91B
FIGURE 2-91C



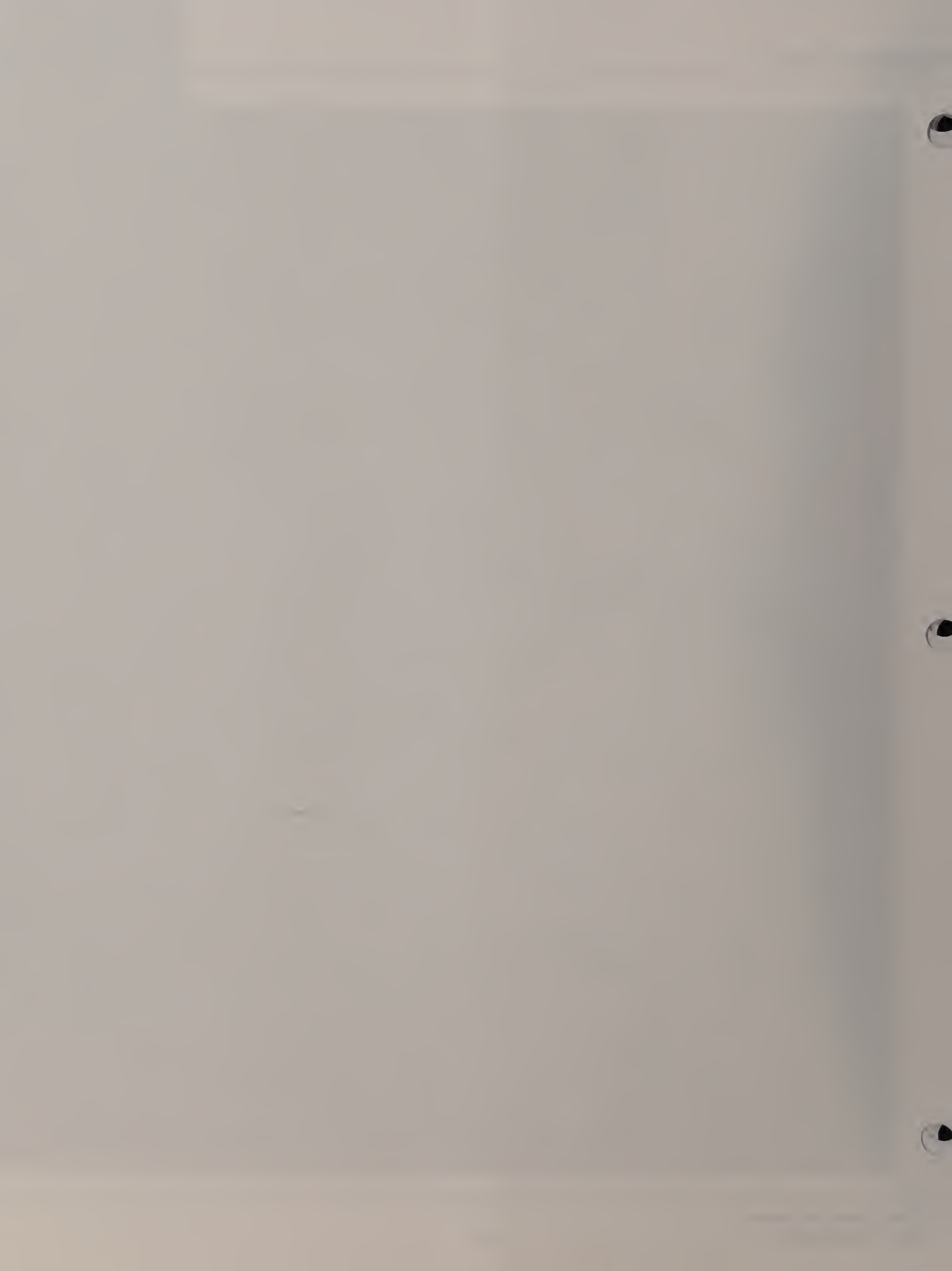




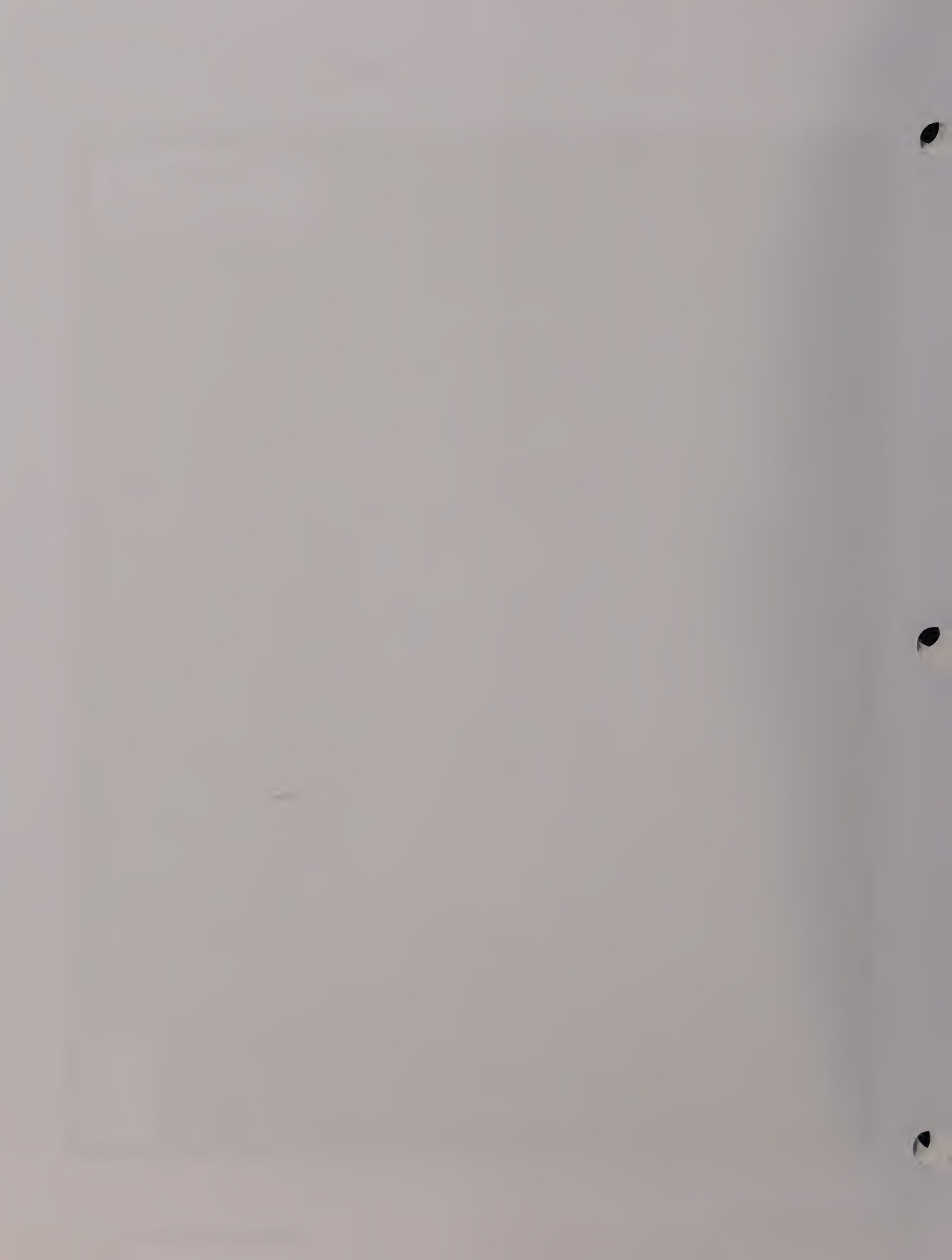


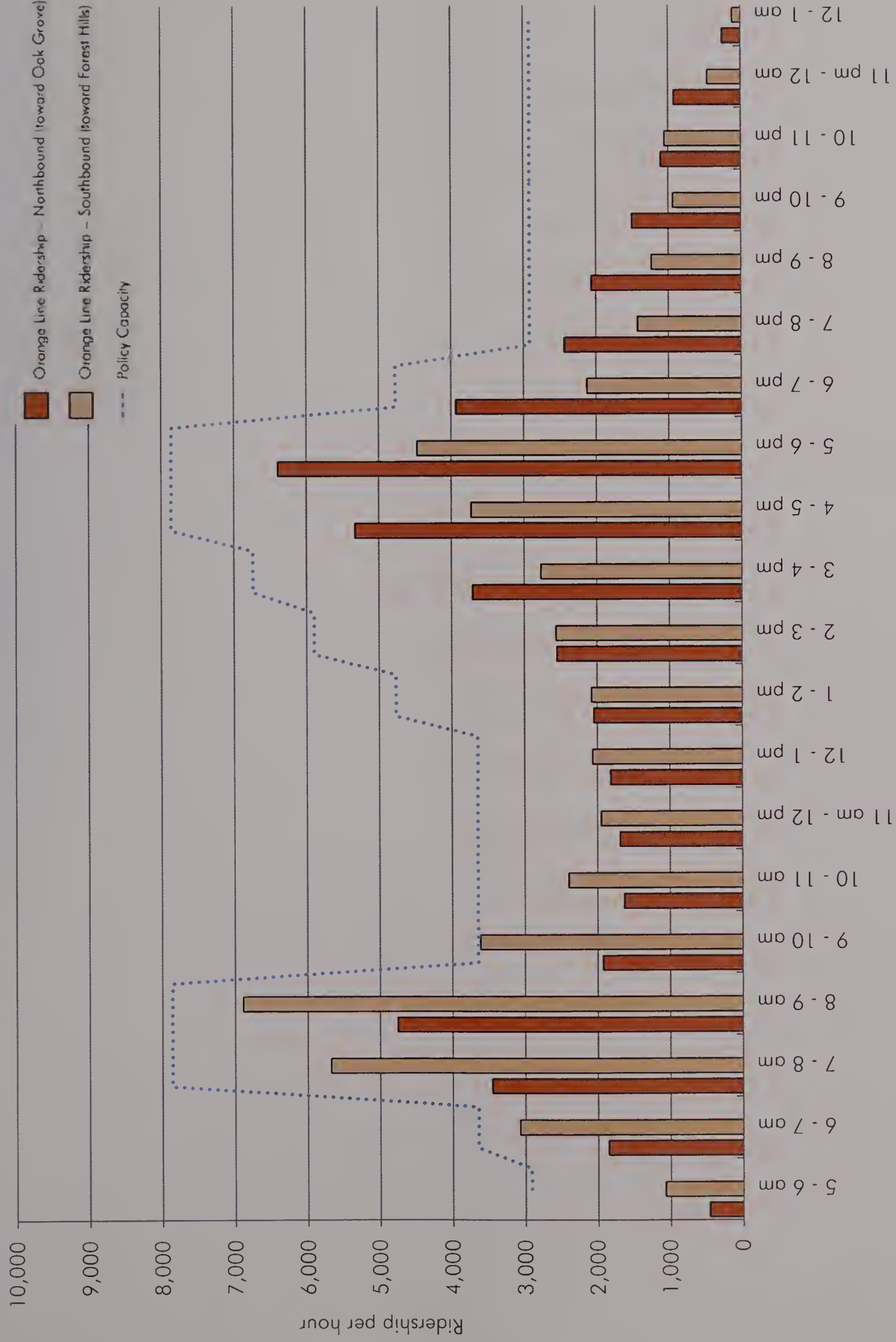






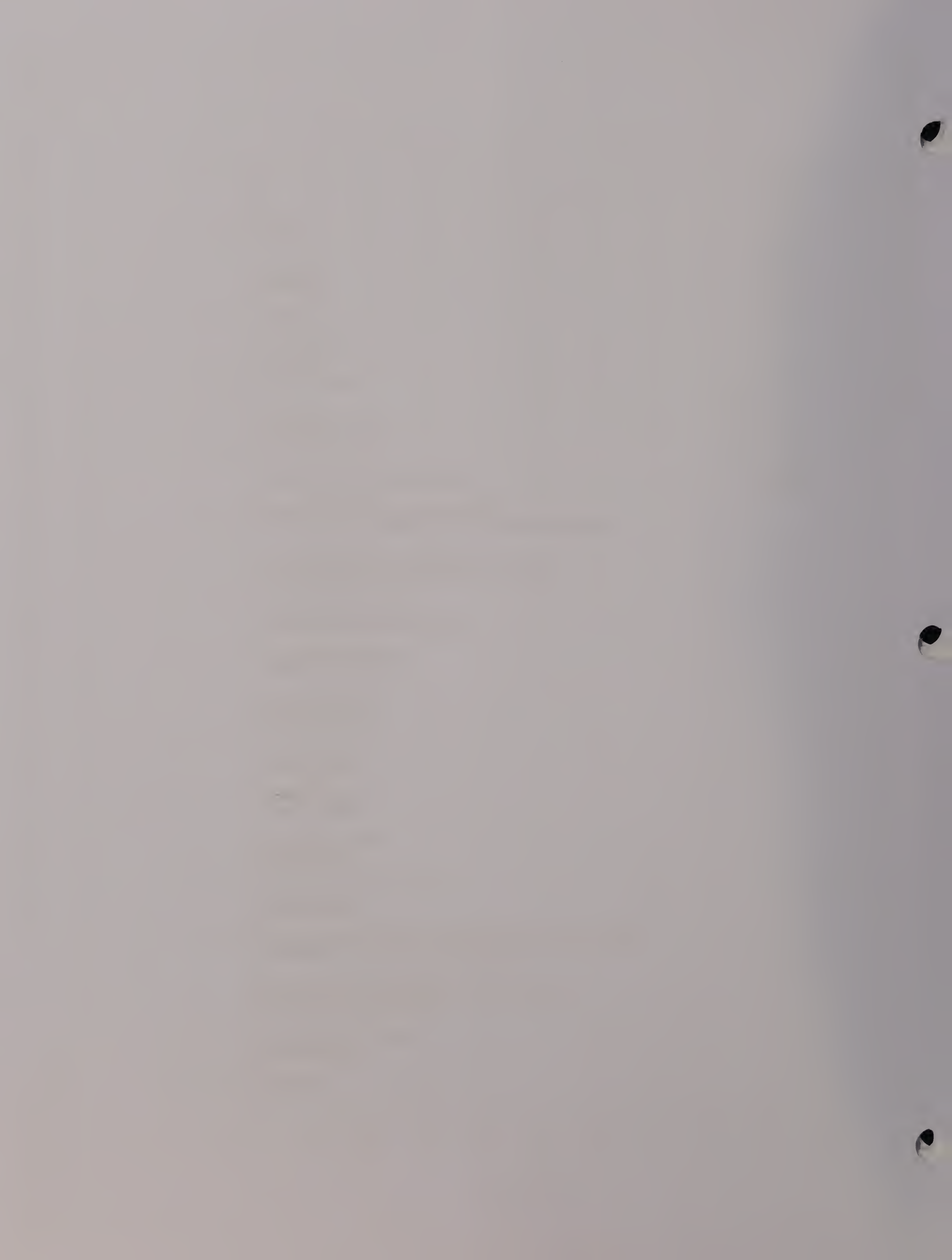


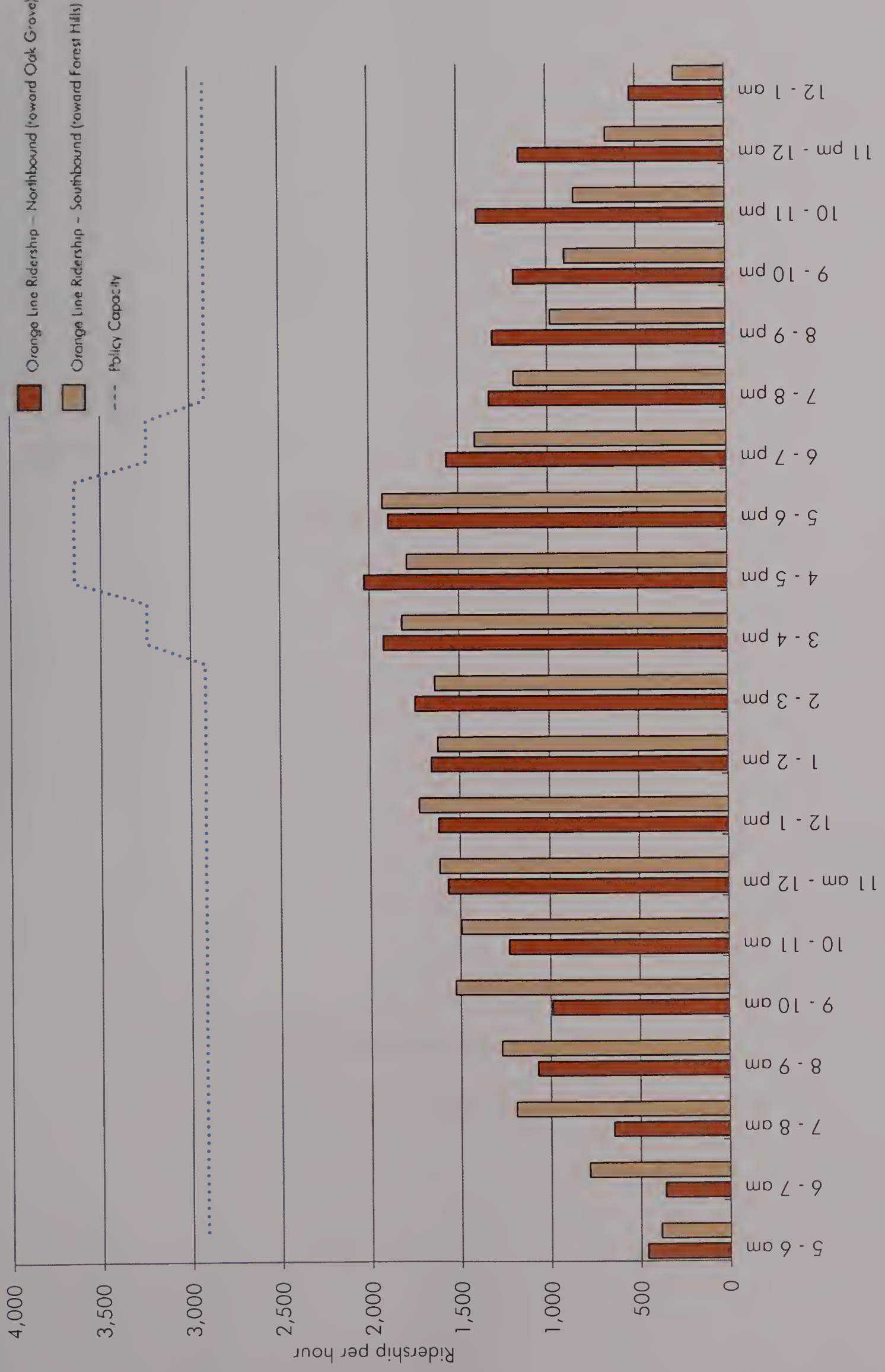




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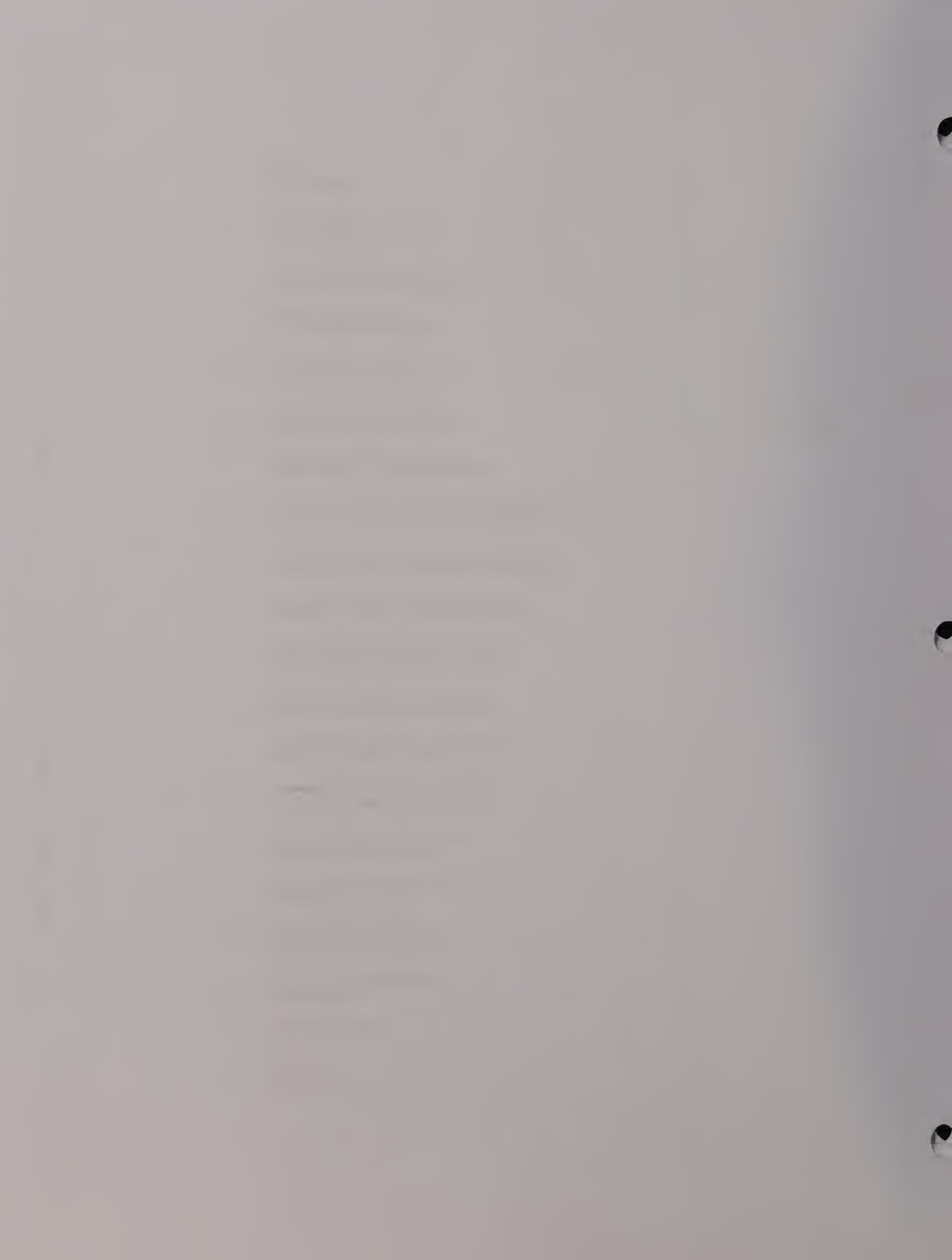
Figure 2-93
MBTA Orange Line, Existing Year 2012 Conditions, Weekday Peak Period Ridership, Peak Load Point: State to Downtown Crossing
Source: Howard/Stein-Hudson Associates, Inc., 2015

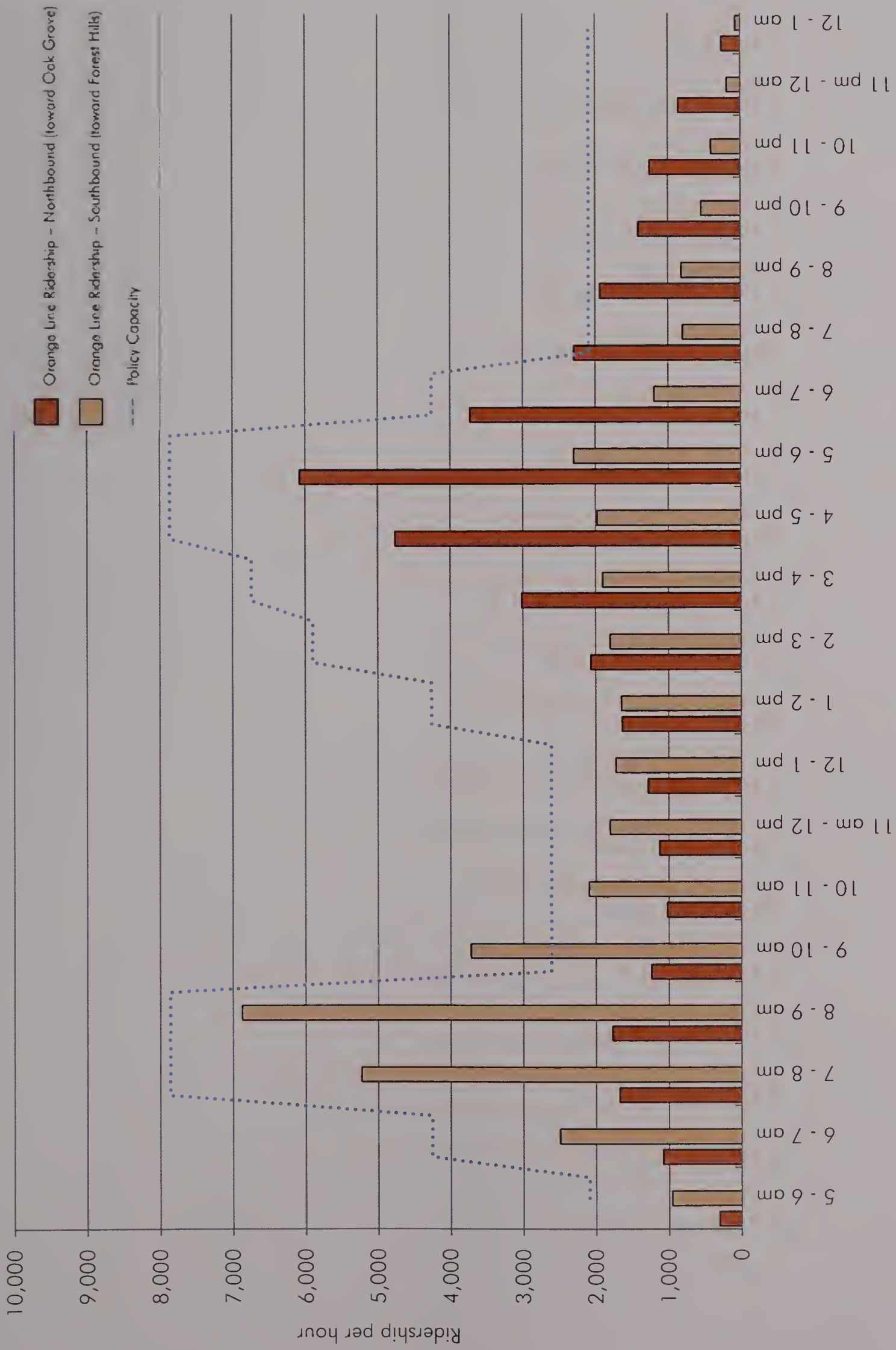




Wynn Resort in Everett
Everett, Massachusetts

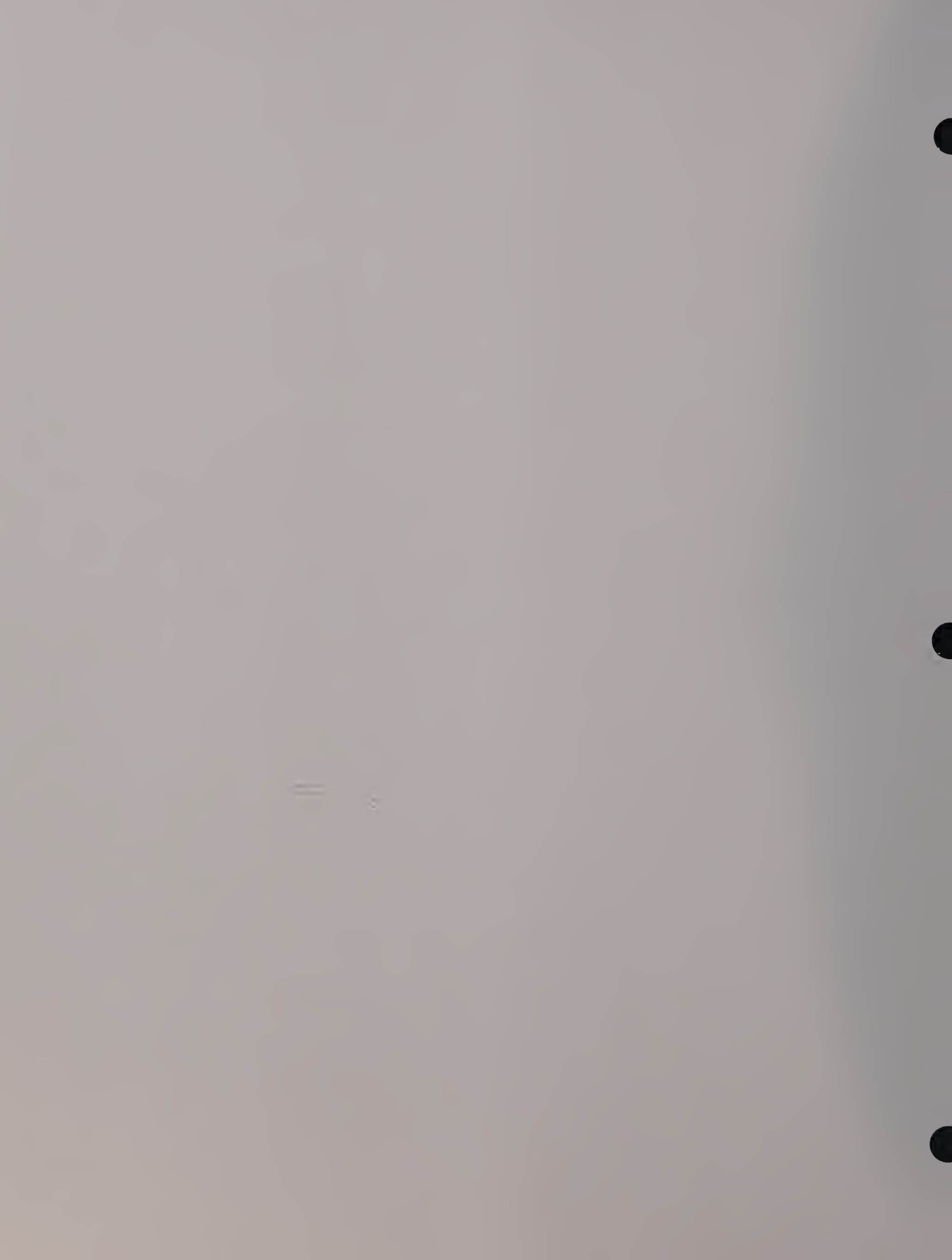
Figure 2-94
MBTA Orange Line, Existing Year 2012 Conditions, Saturday Peak Period Ridership, Peak Load Point: State to Downtown Crossing
Source: Howard/Stein-Hudson Associates, Inc., 2015

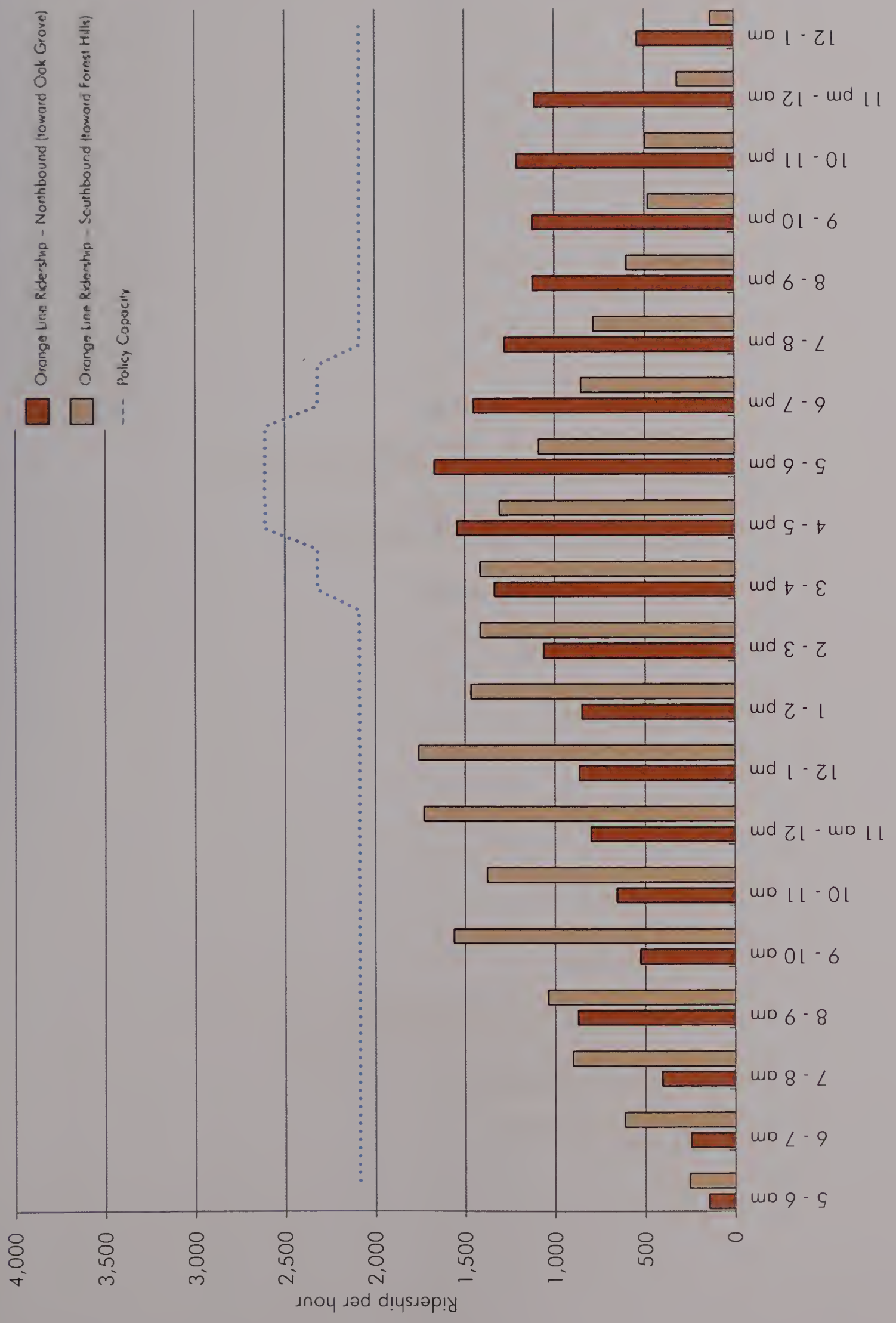




Wynn Resort in Everett
Everett, Massachusetts

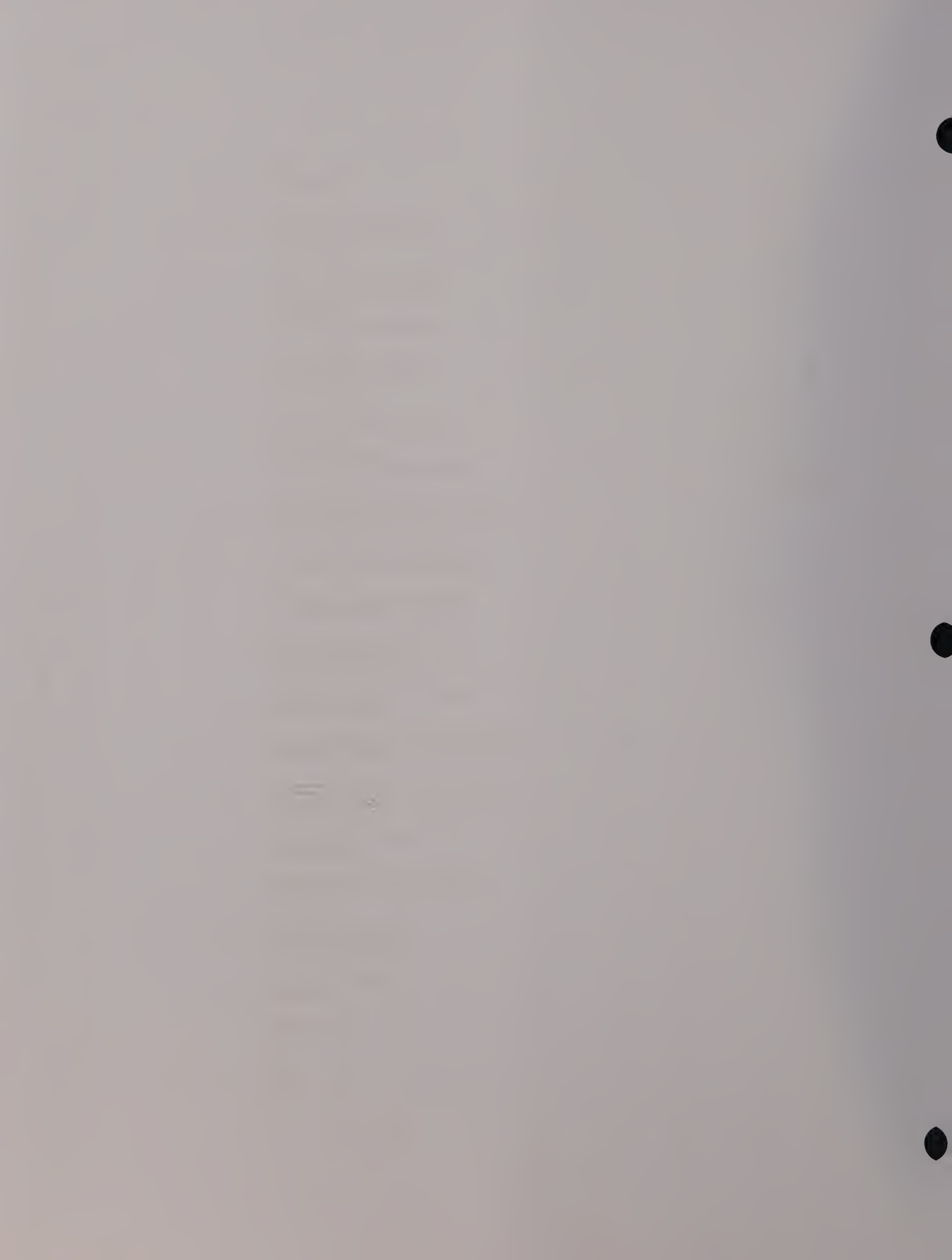
Figure 2-95
MBTA Orange Line, Existing Year 2012 Conditions, Weekday Peak Period Ridership, Peak Load Point: North Station to Community College
Source: Howard/Stein-Hudson Associates, Inc., 2015

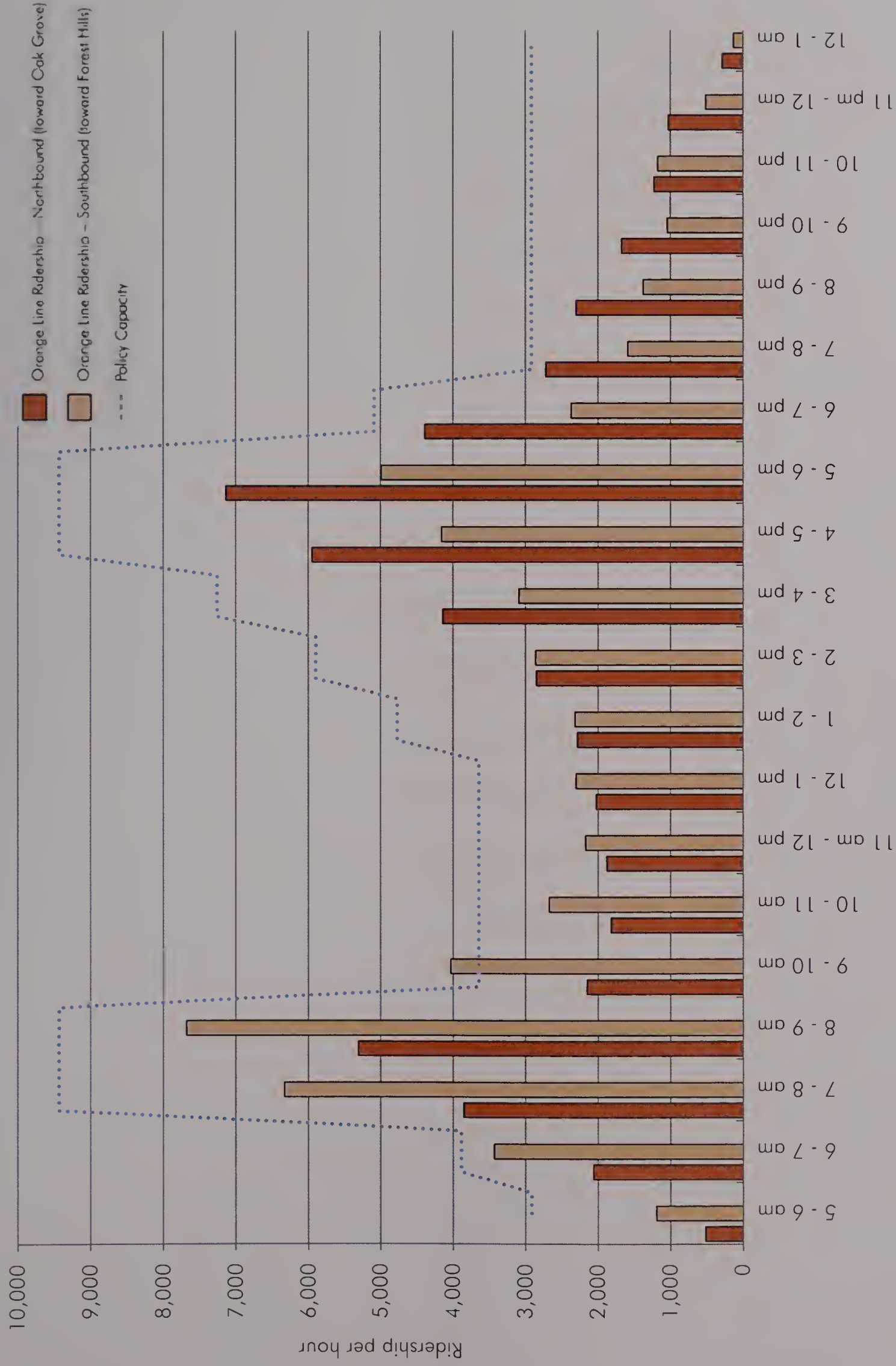


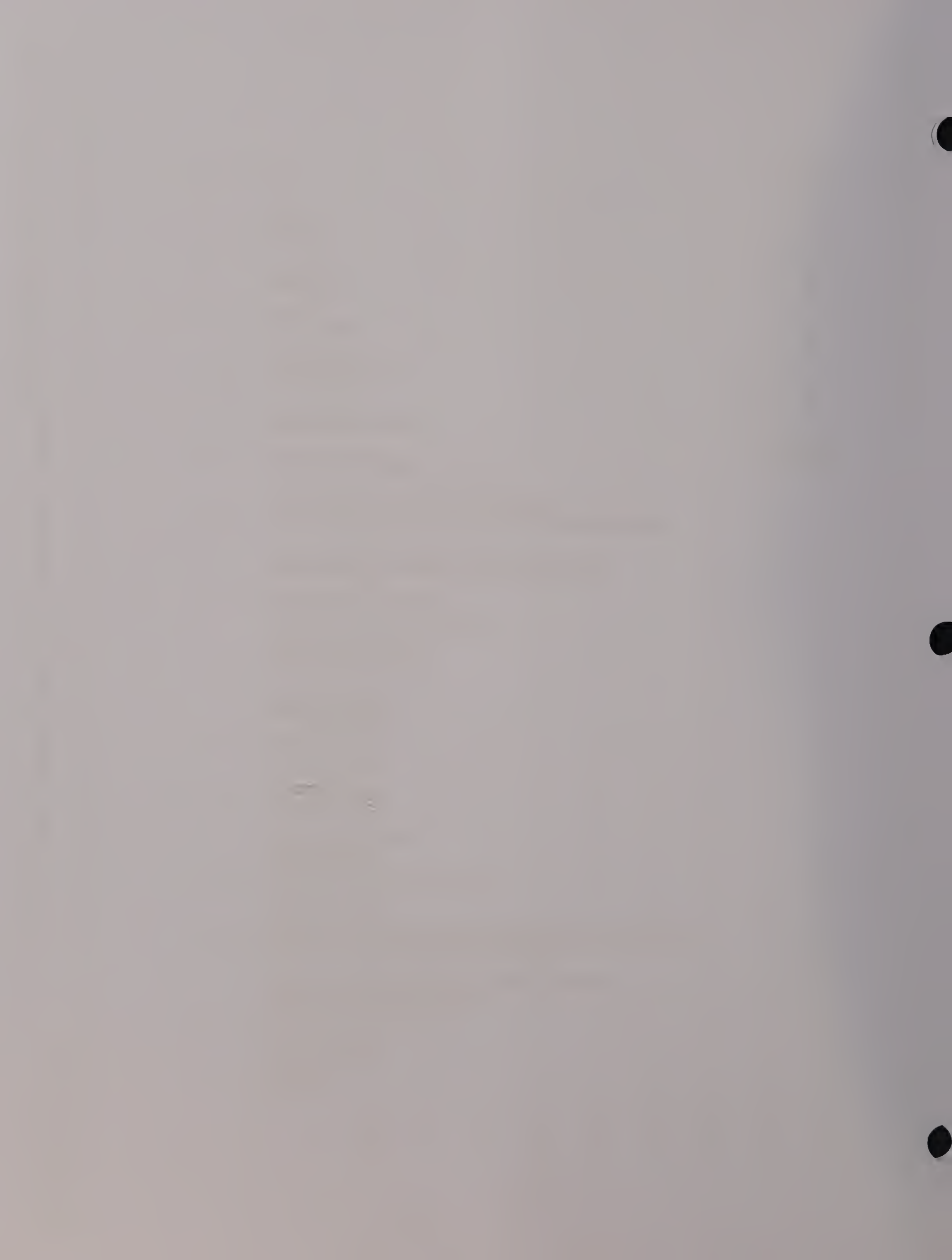


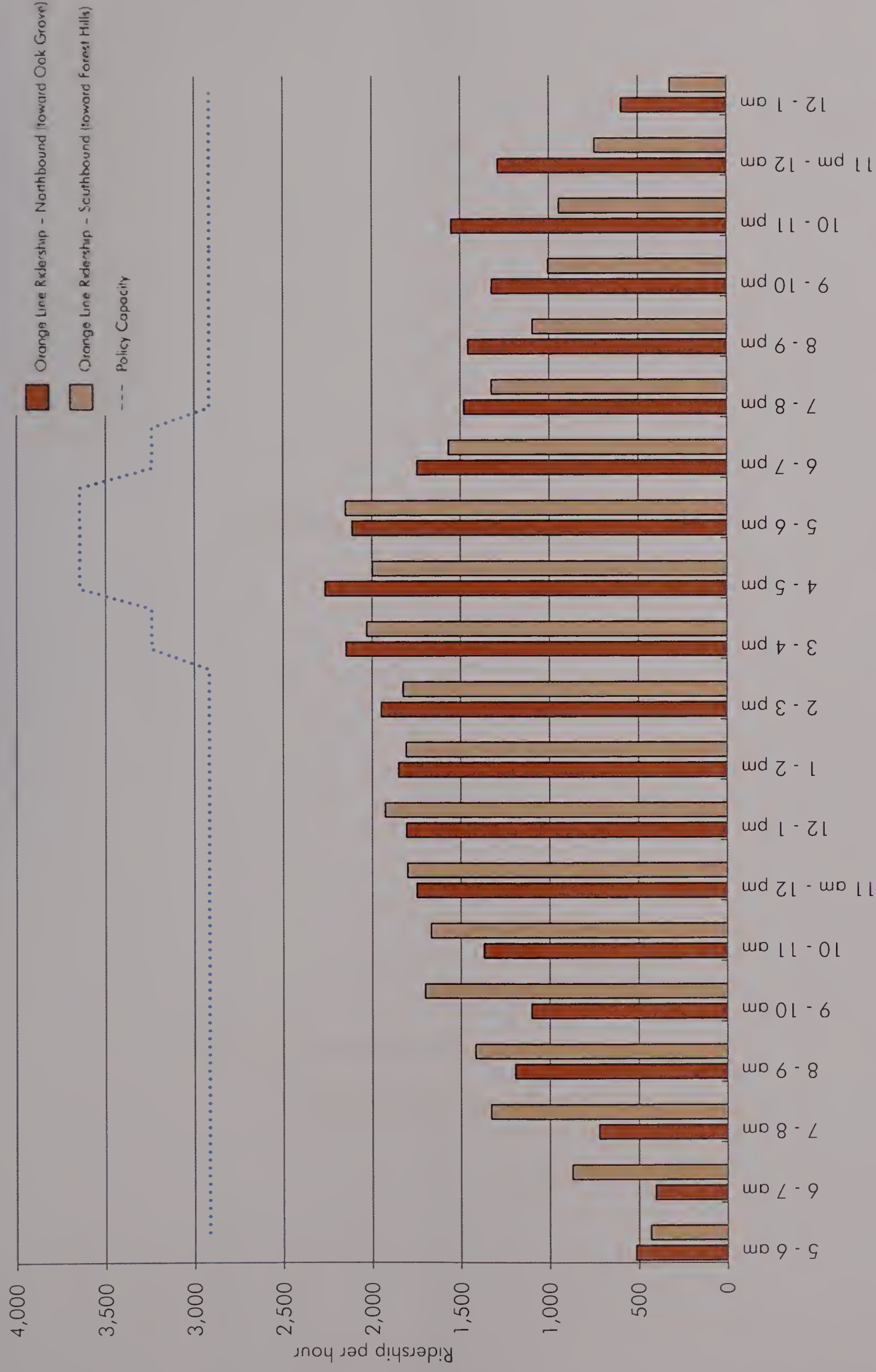
Wynn Resort in Everett
Everett, Massachusetts

Figure 2-96
MBTA Orange Line, Existing Year 2012 Conditions, Saturday Peak Period Ridership, Peak Load Point: North Station to Community College
Source: Howard/Stein-Hudson Associates, Inc., 2015



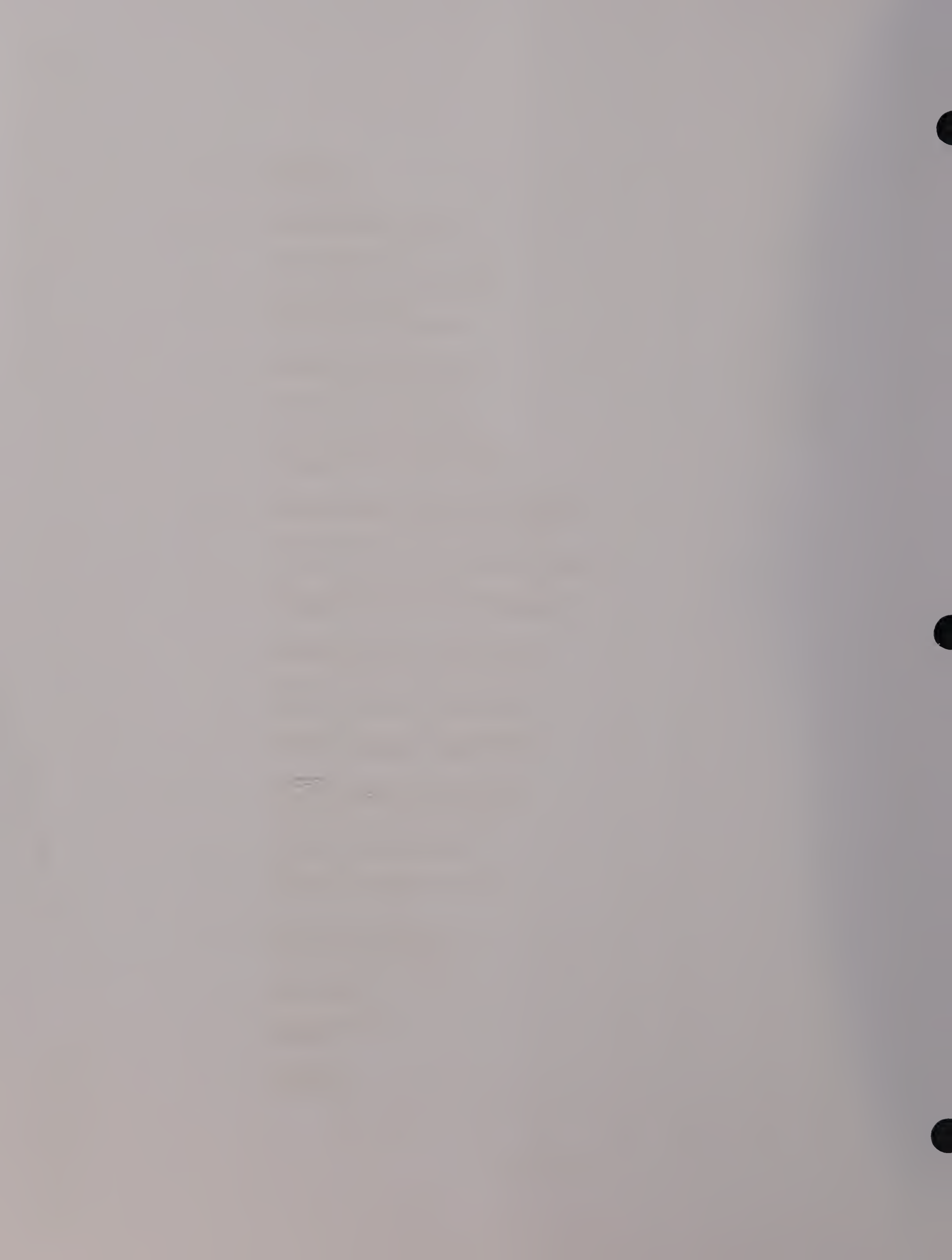


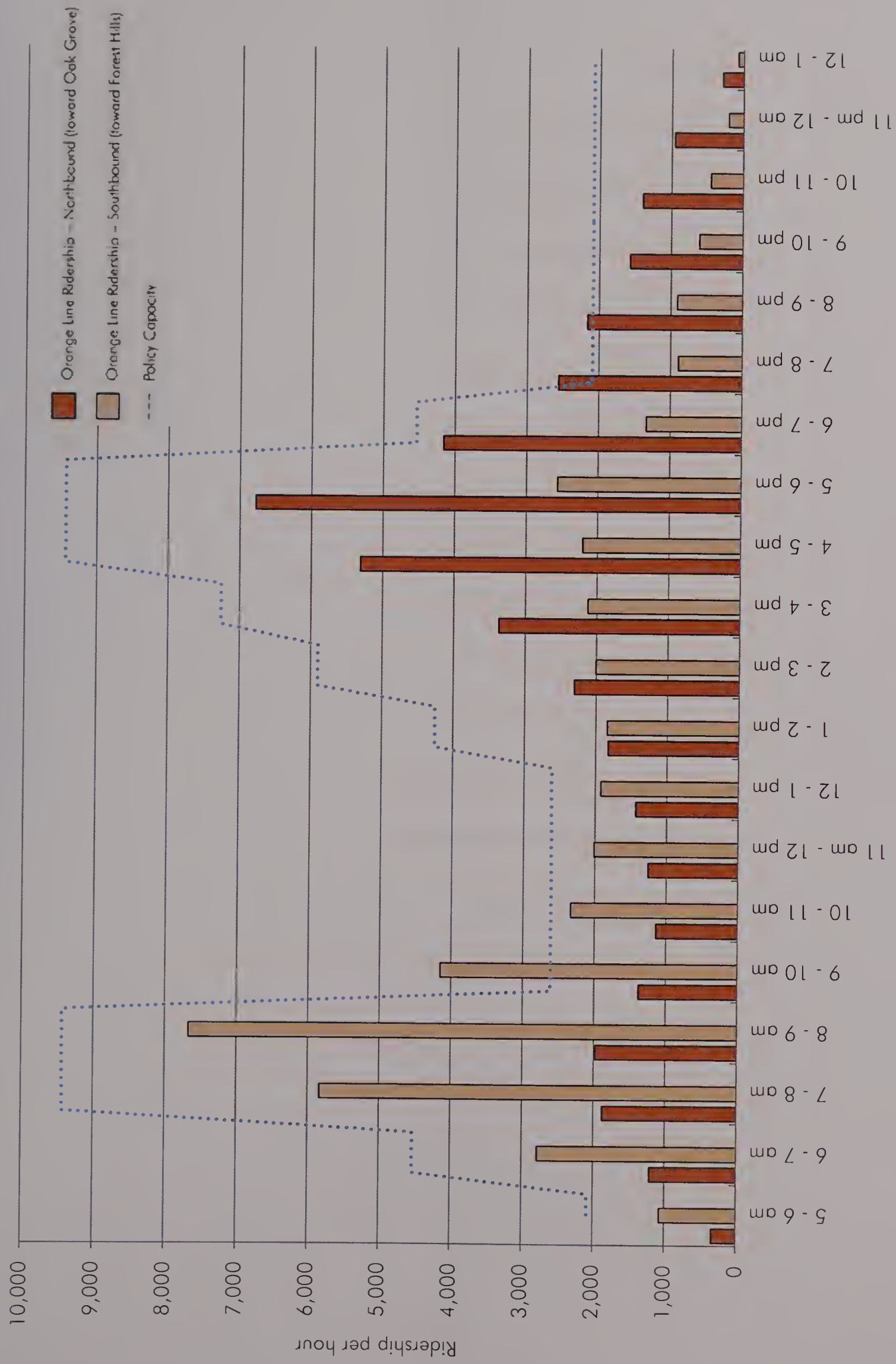




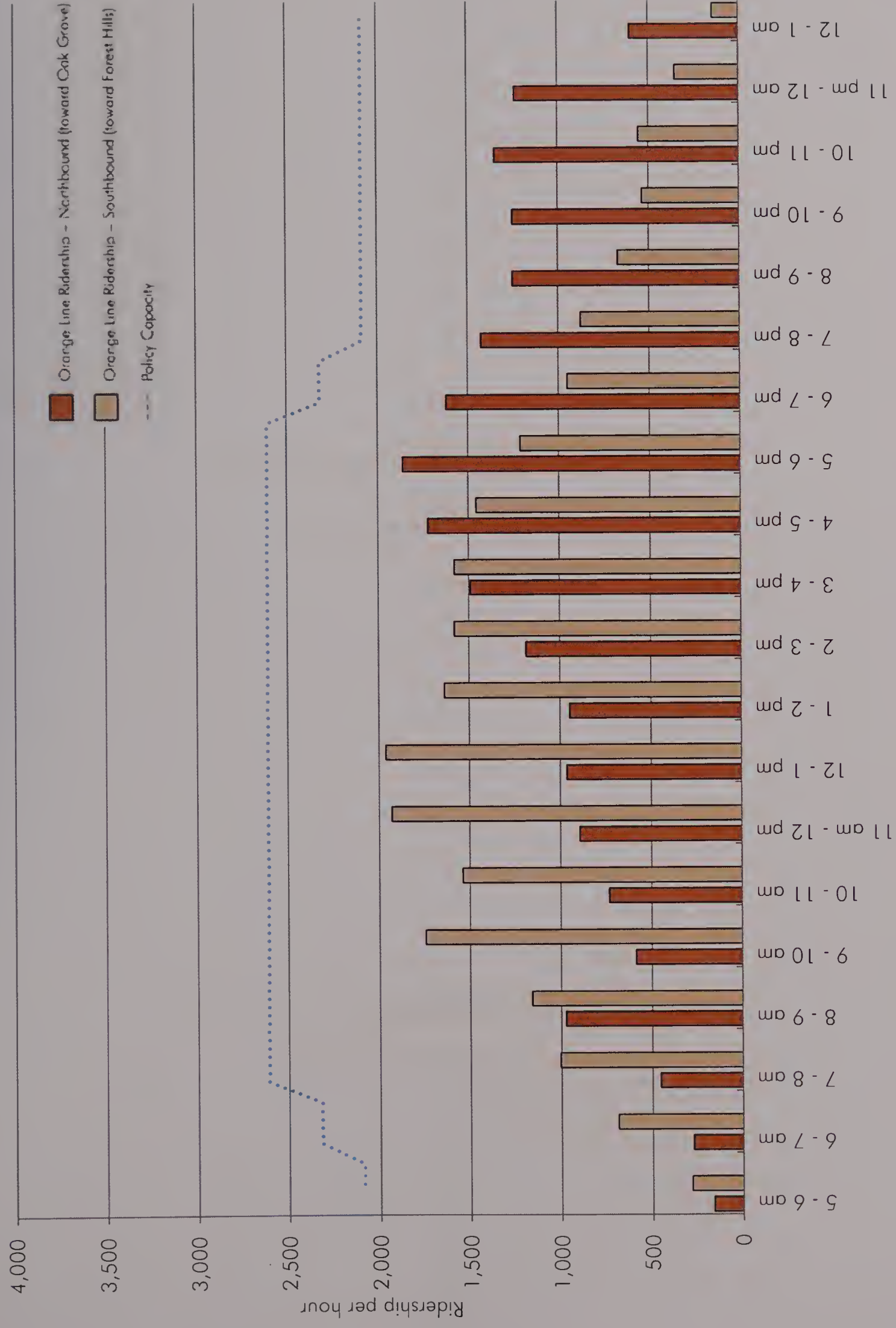
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Everett, Massachusetts

Figure 2-98
MBTA Orange Line, No-Build Year 2023 Conditions, Saturday Peak Period Ridership, Peak Load Point: State to Downtown Crossing
Source: Howard/Stein-Hudson Associates, Inc., 2015



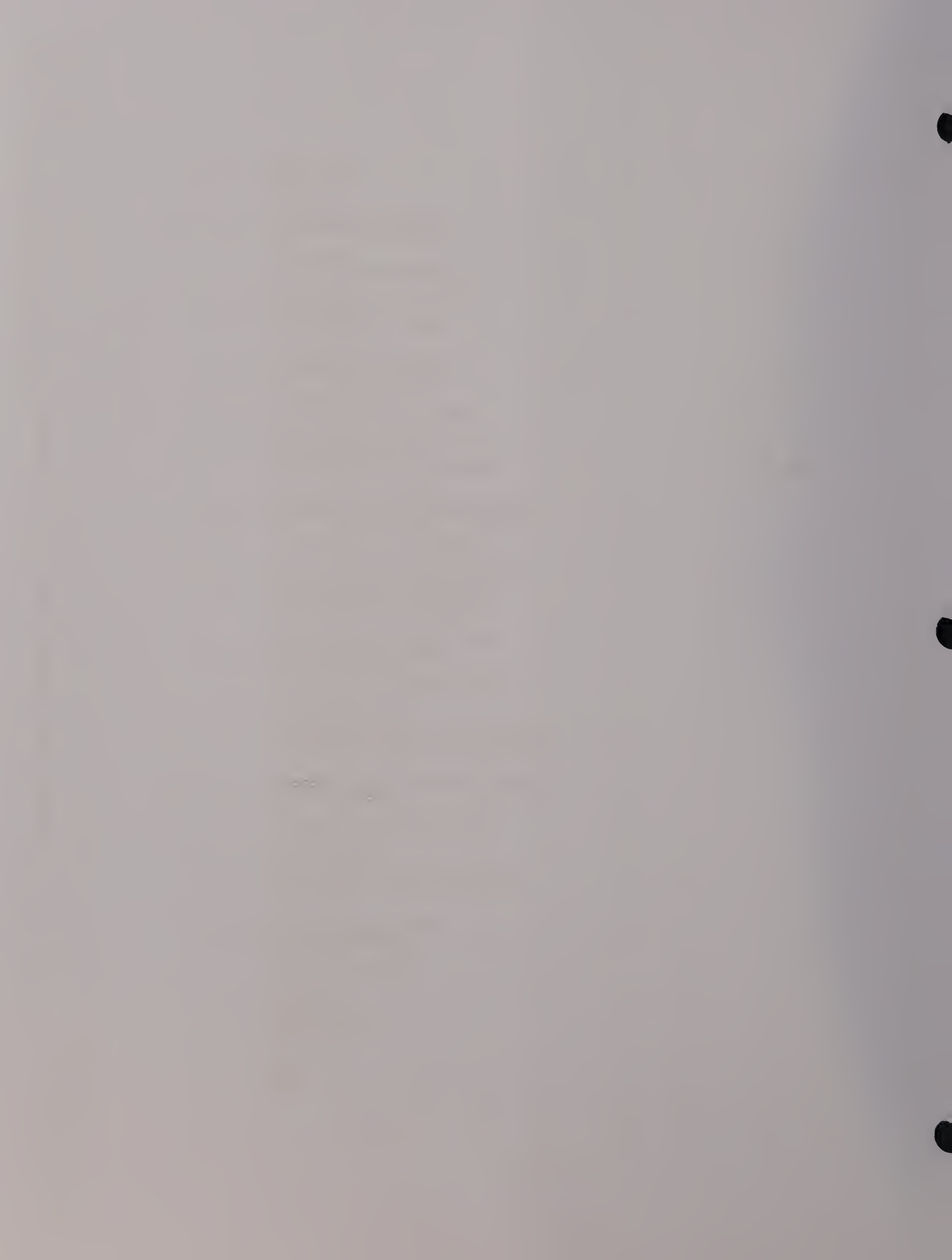


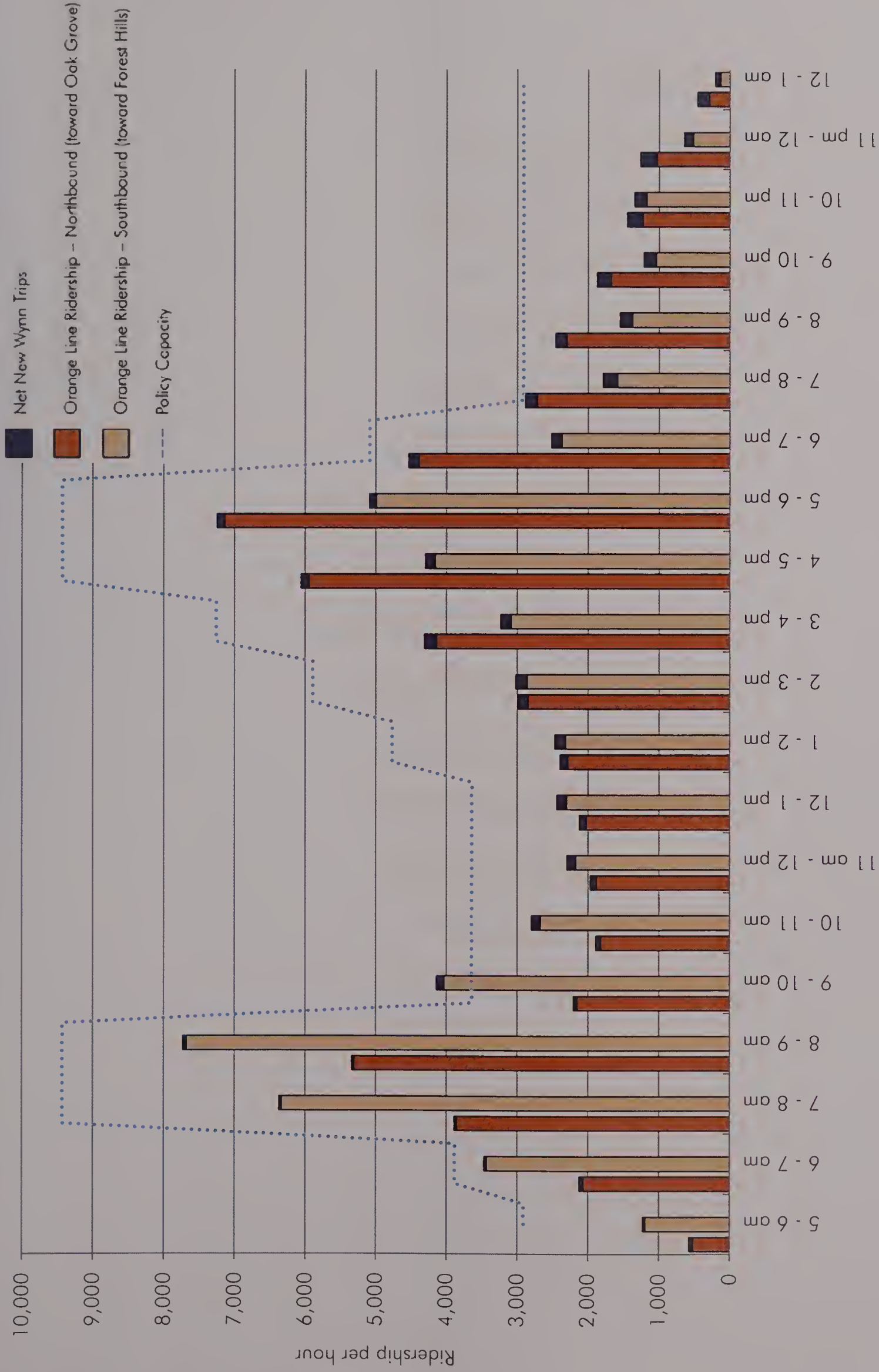




Wynn Resort in Everett
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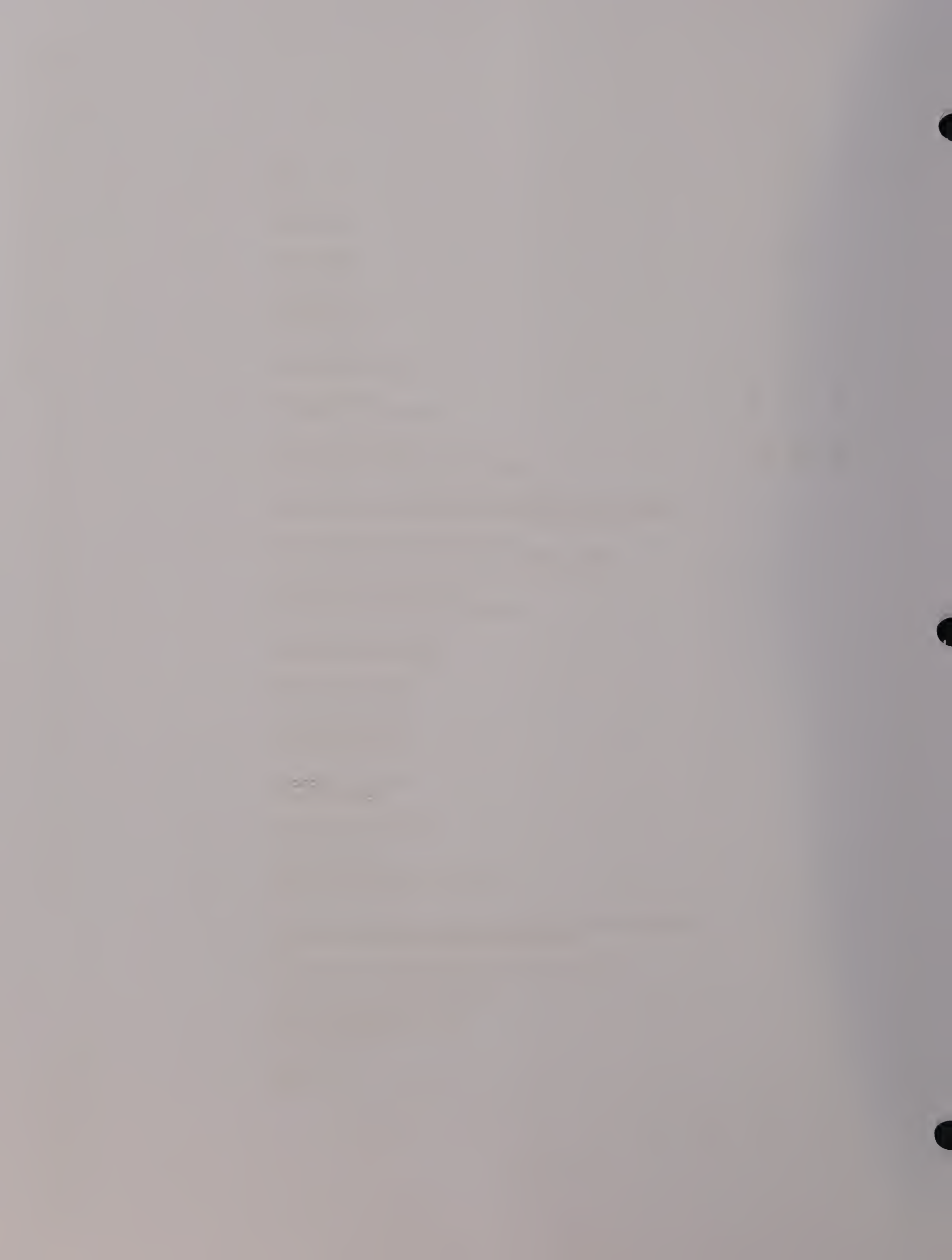
Figure 2-100
MBTA Orange Line, No-Build Year 2023 Conditions, Saturday Peak Period Ridership, Peak Load Point: North Station to Community College
Source: Howard/Stein-Hudson Associates, Inc., 2015

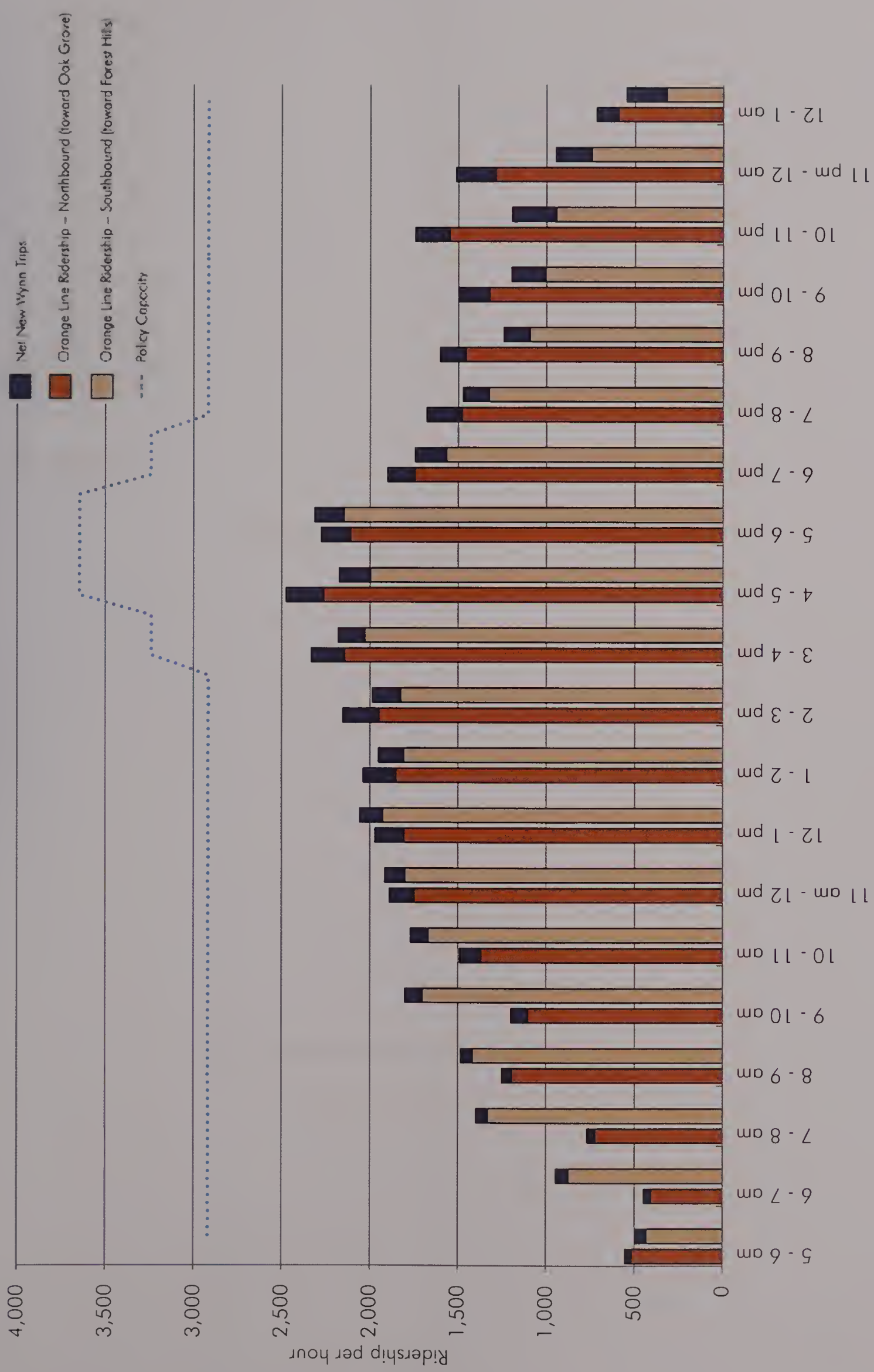




Wynn Resort in Everett
Everett, Massachusetts

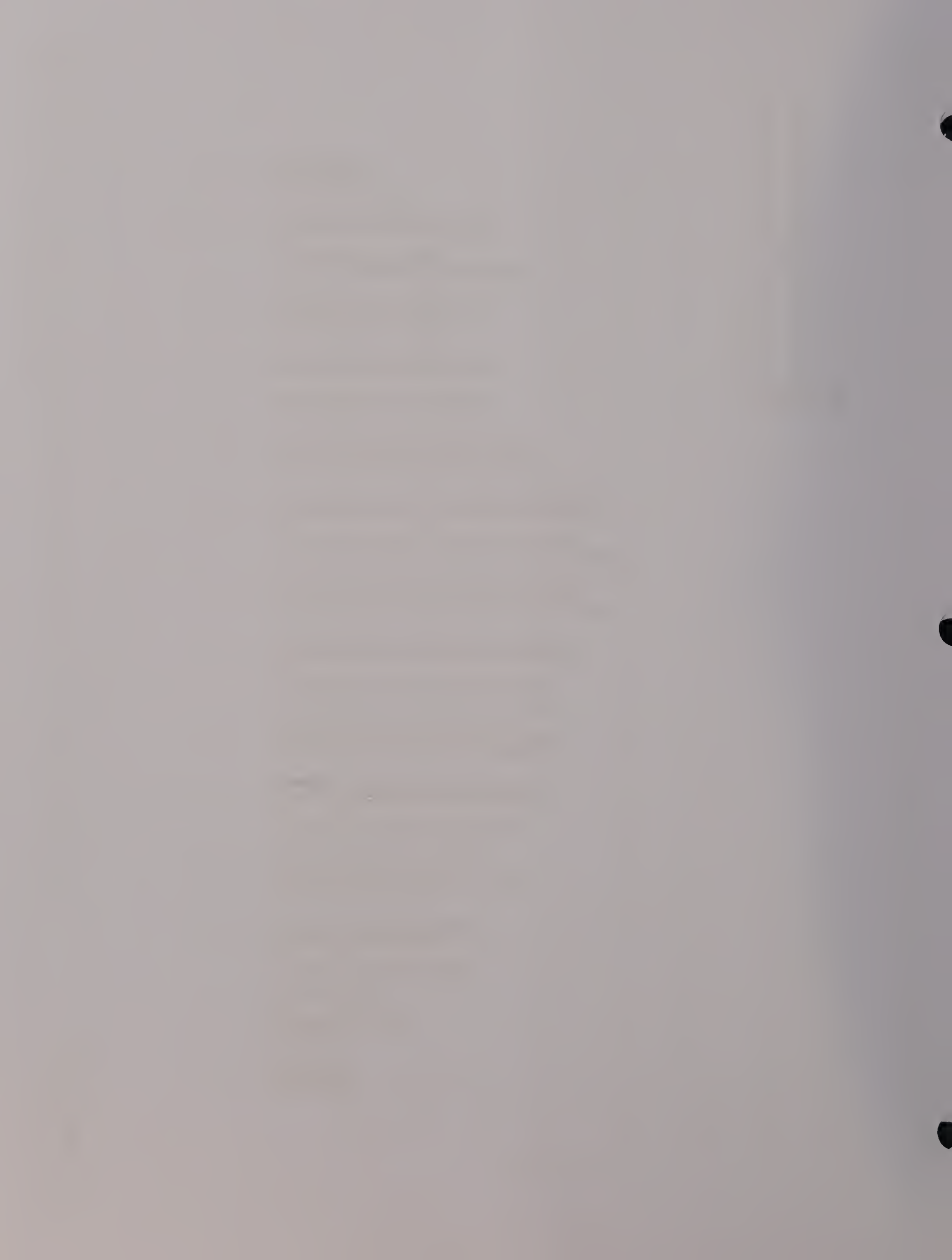
Figure 2-101
MBTA Orange Line, Build Year 2023 Conditions, Weekday Peak Period Ridership, Peak Load Point: State to Downtown Crossing
Source: Howard/Stein-Hudson Associates, Inc., 2015

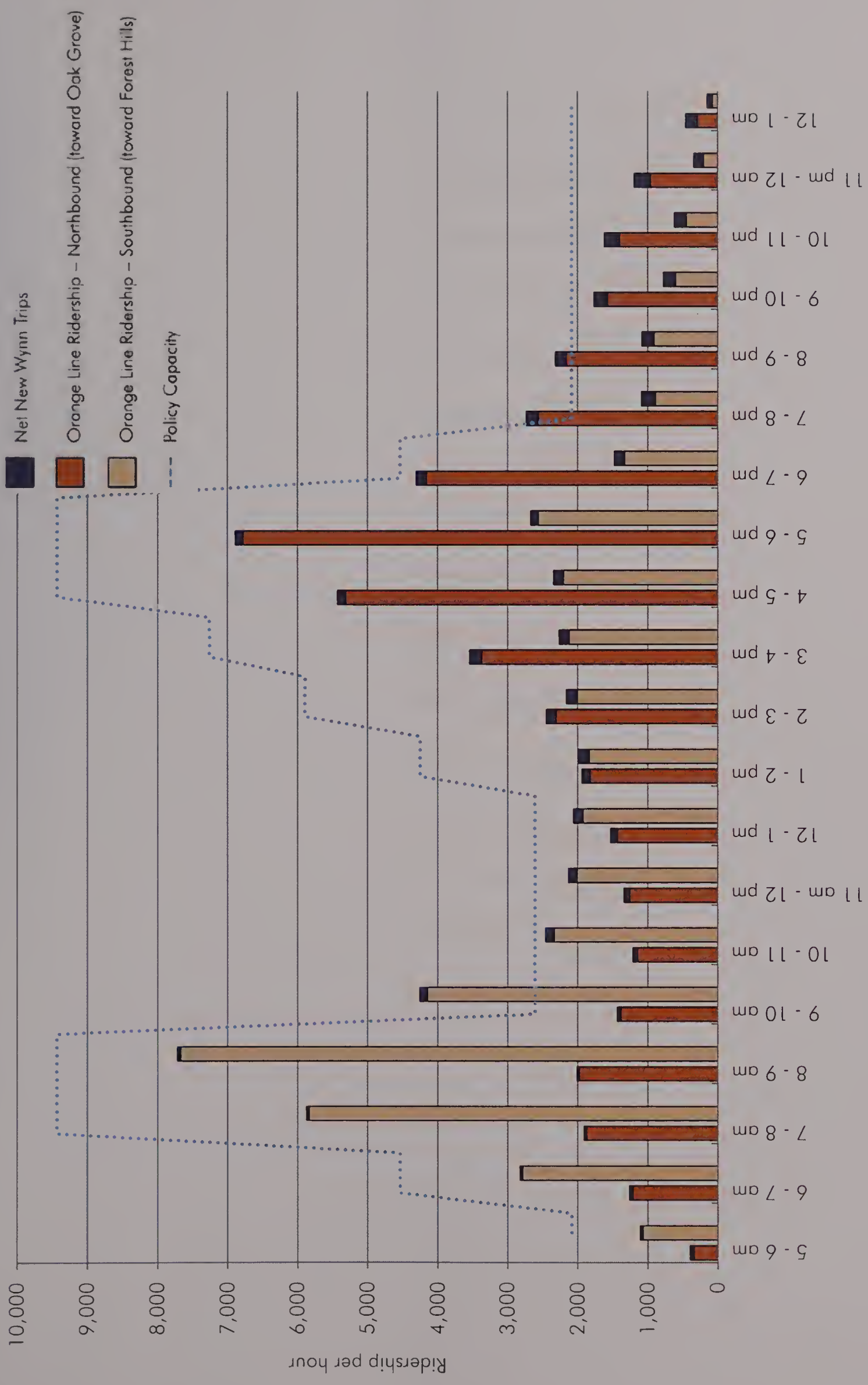




Wynn Resort in Everett
Everett, Massachusetts

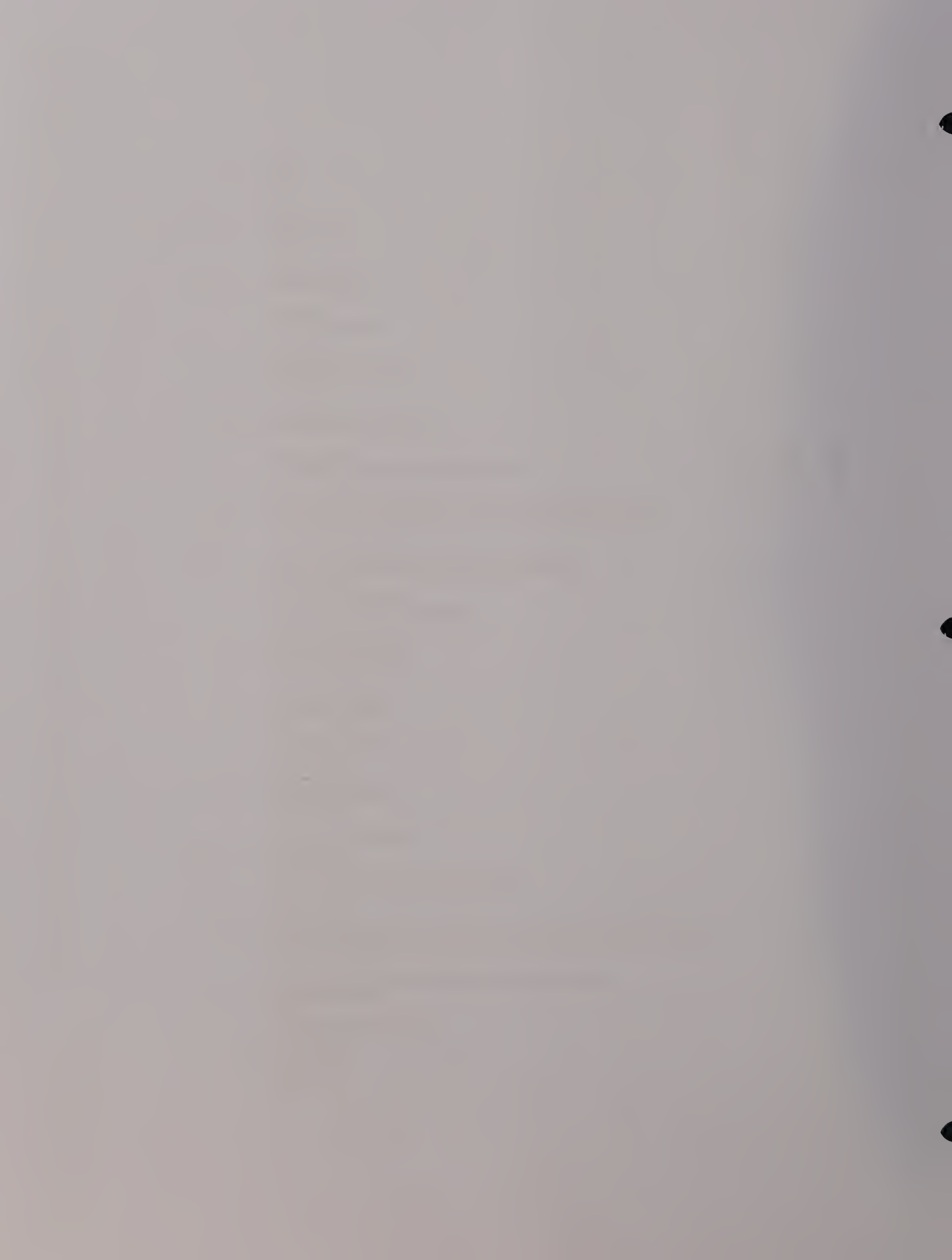
Figure 2-102
MBTA Orange Line, Build Year 2023 Conditions, Saturday Peak Period Ridership, Peak Load Point: State to Downtown Crossing
Source: Howard/Stein-Hudson Associates, Inc., 2015

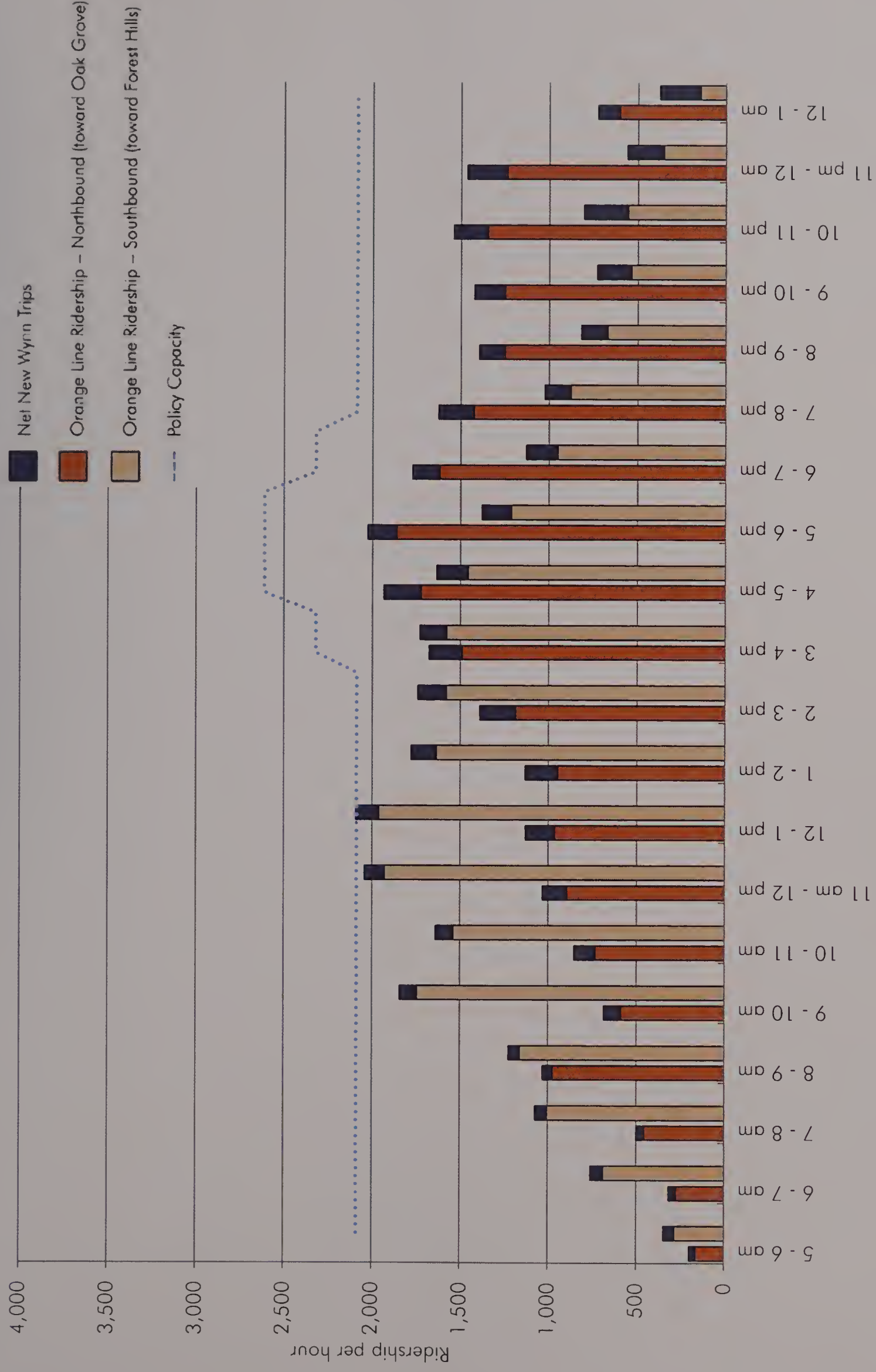


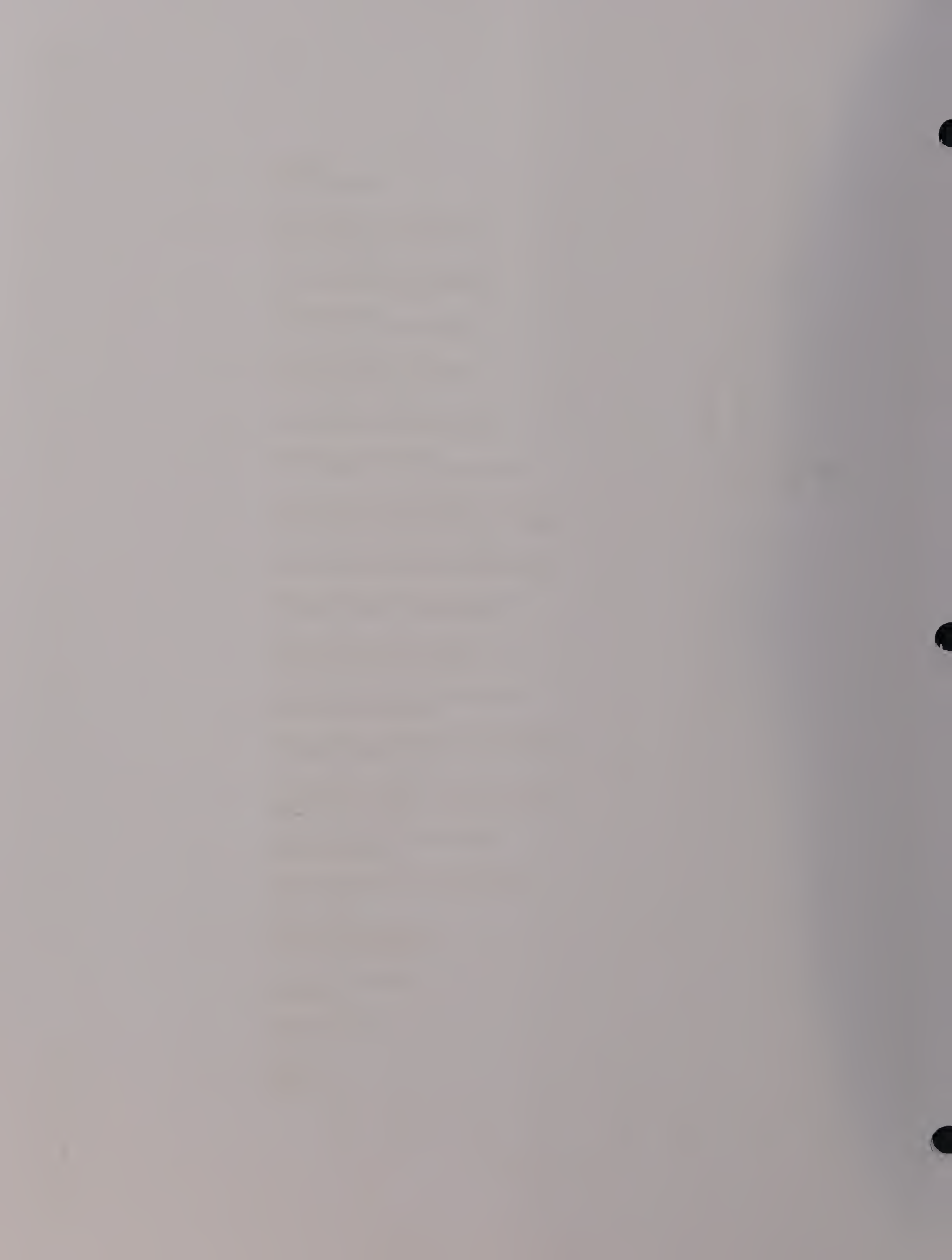


Wynn Resort in Everett
Everett, Massachusetts

Figure 2-103
MBTA Orange Line, Build Year 2023 Conditions, Weekday Peak Period Ridership, Peak Load Point: North Station to Community College
Source: Howard/Stein-Hudson Associates, Inc., 2015







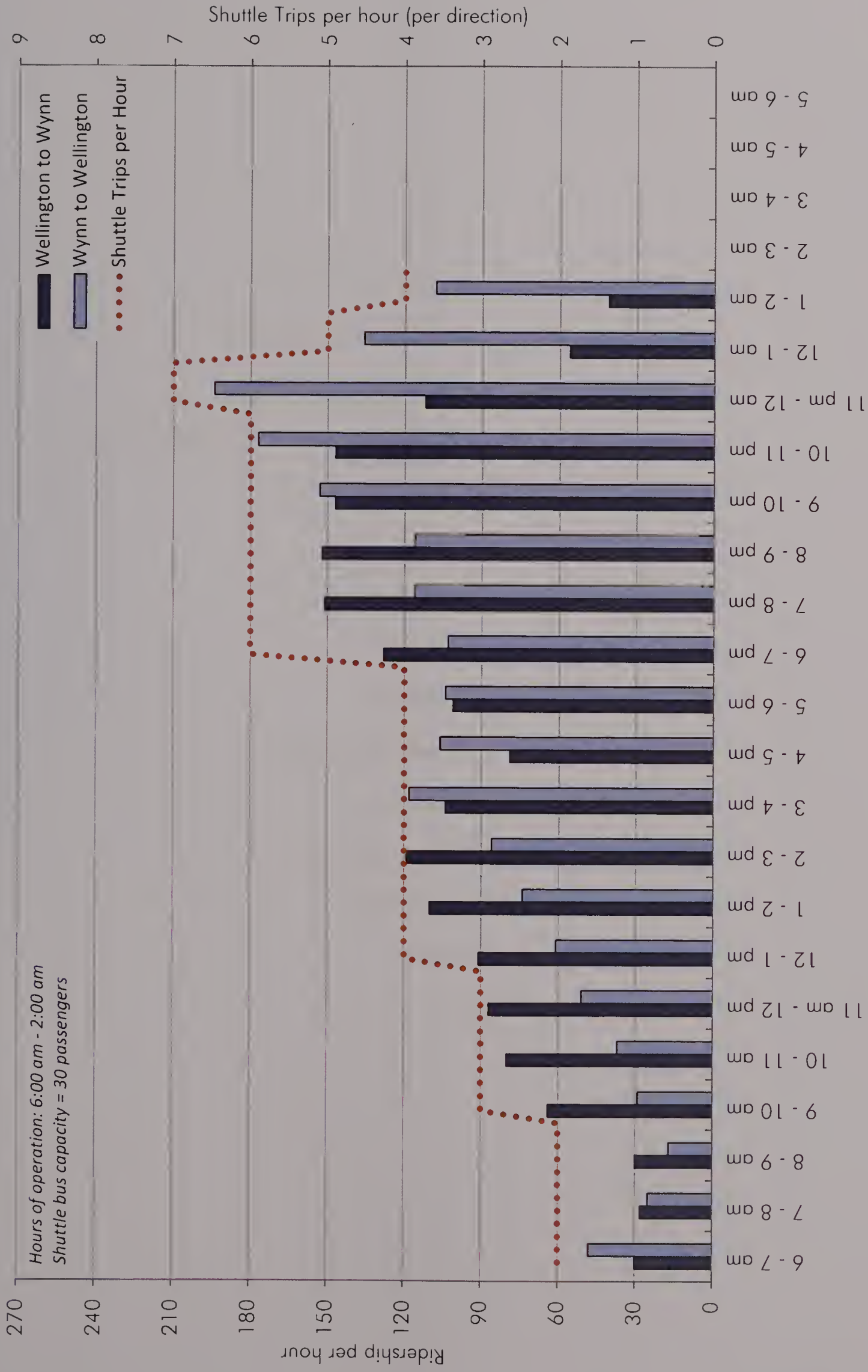


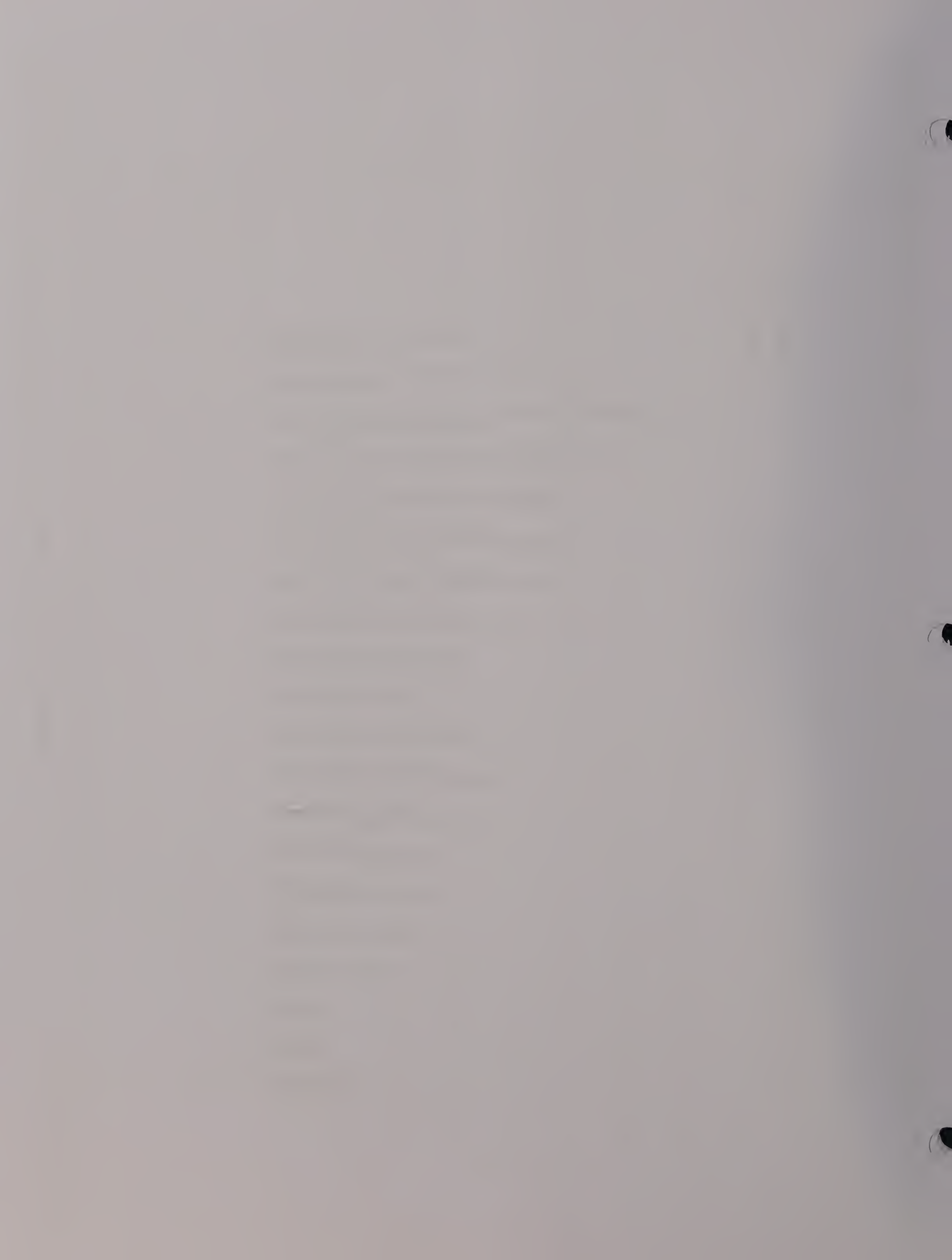




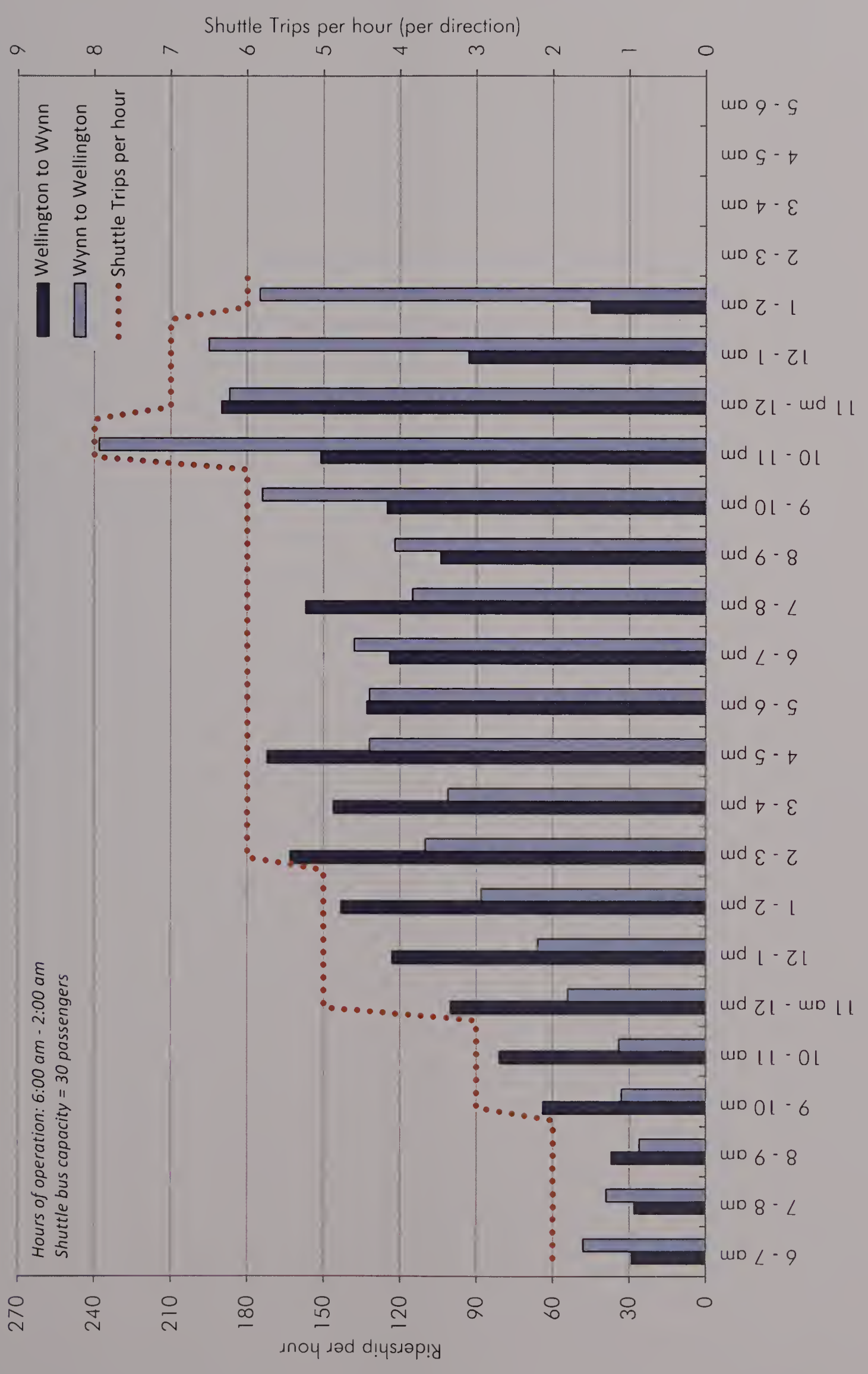


Friday Conditions



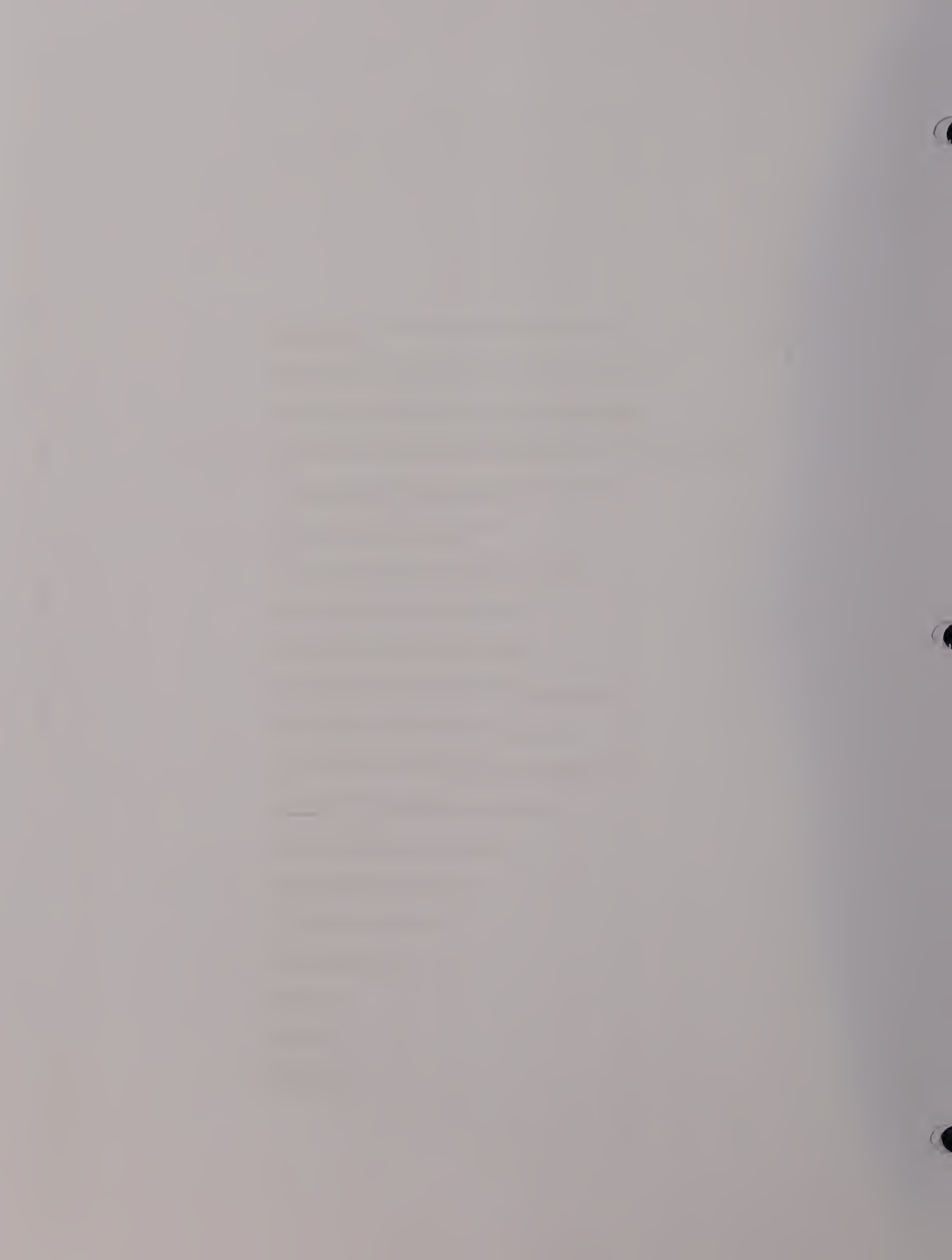


Saturday Conditions



Wynn Resort in Everett
Everett, Massachusetts

Figure 2-108
Wynn Patron Shuttle to/from Wellington Station Ridership and Shuttle Trips per Hour Saturday Conditions
Source: Howard/Stein-Hudson Associates, Inc., 2015

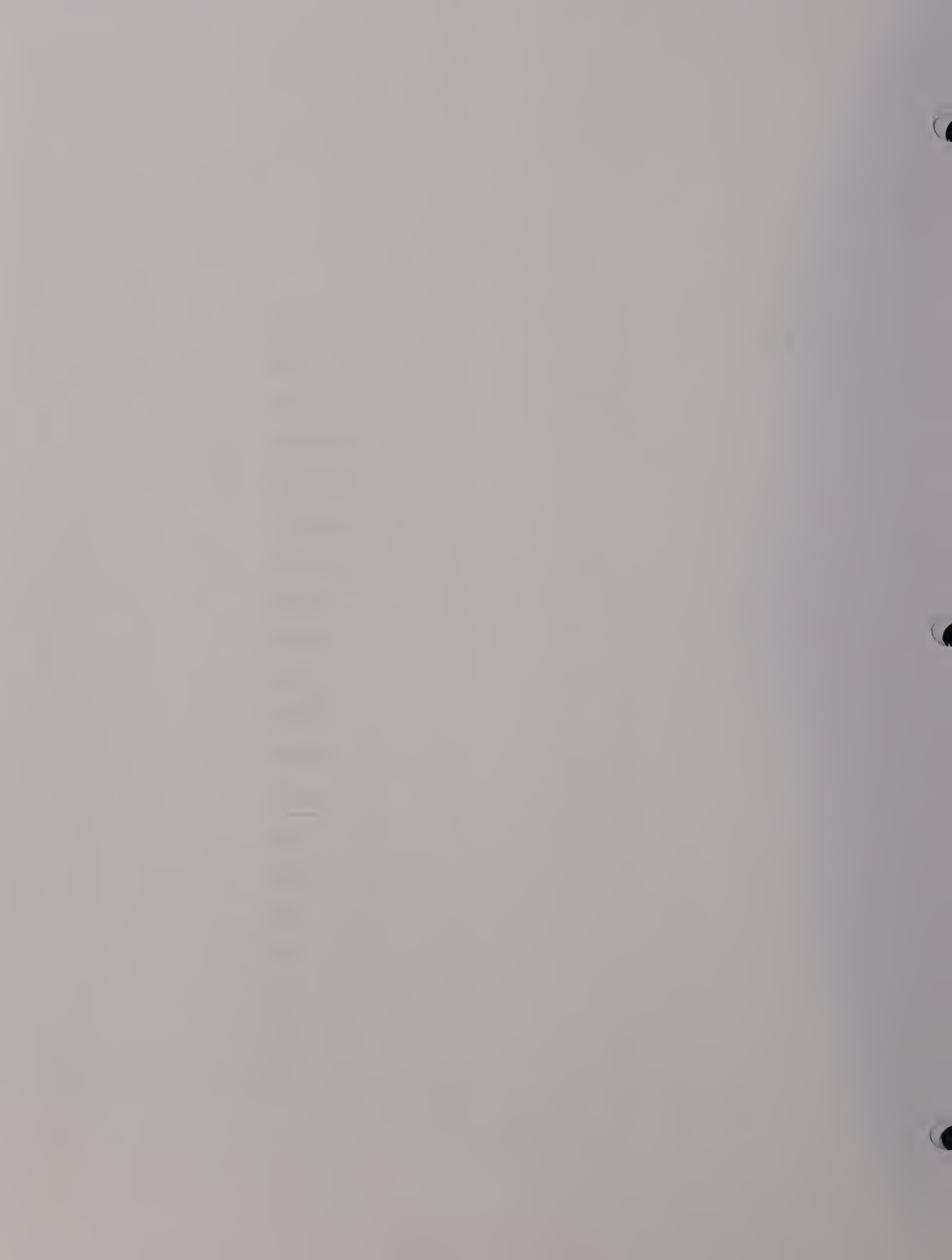


Friday Conditions



Wynn Resort in Everett
Everett, Massachusetts

Figure 2-109
Wynn Patron Shuttle to/from Malden Station Ridership and Shuttle Trips per Hour Friday Conditions
Source: Howard/Stein-Hudson Associates, Inc., 2015

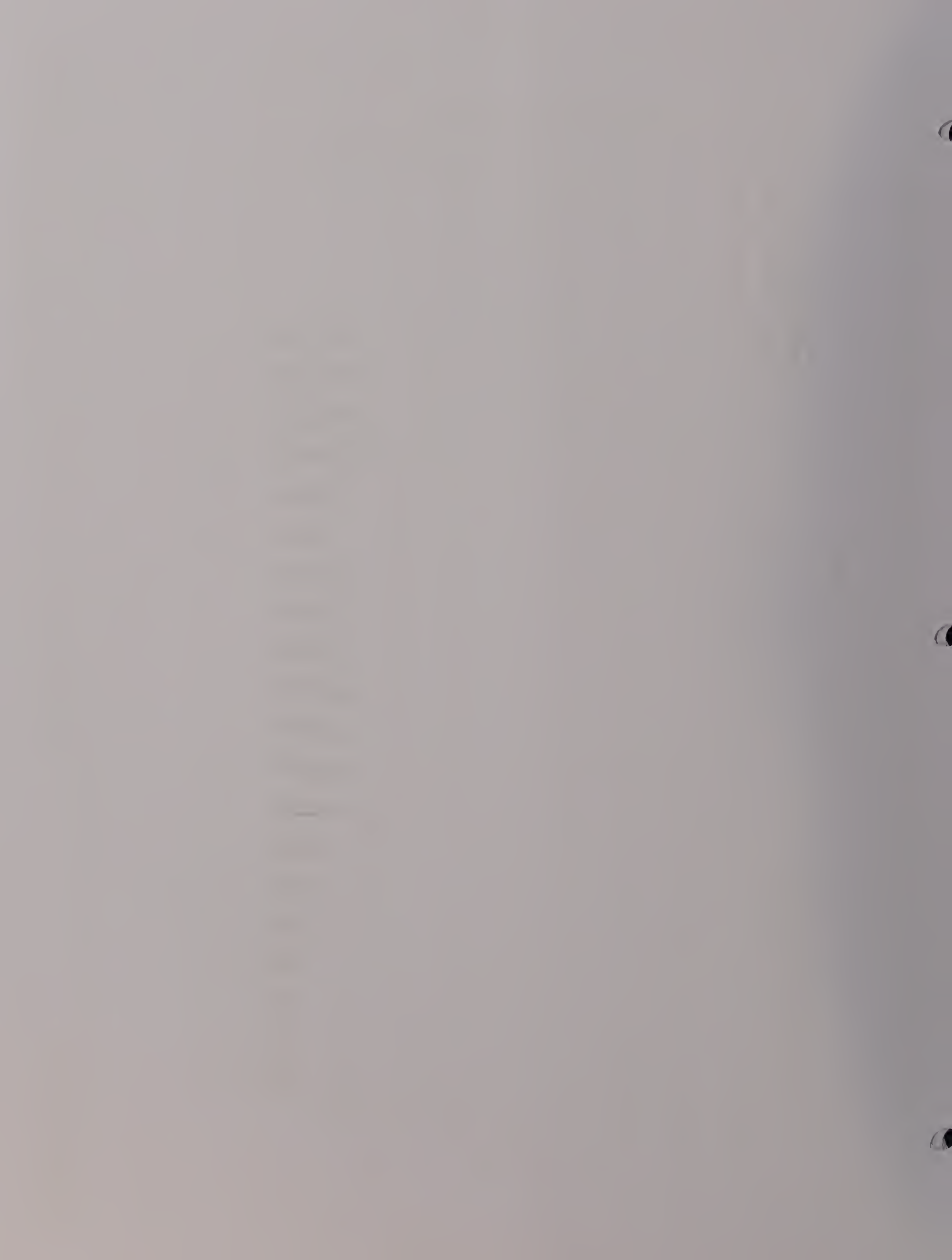


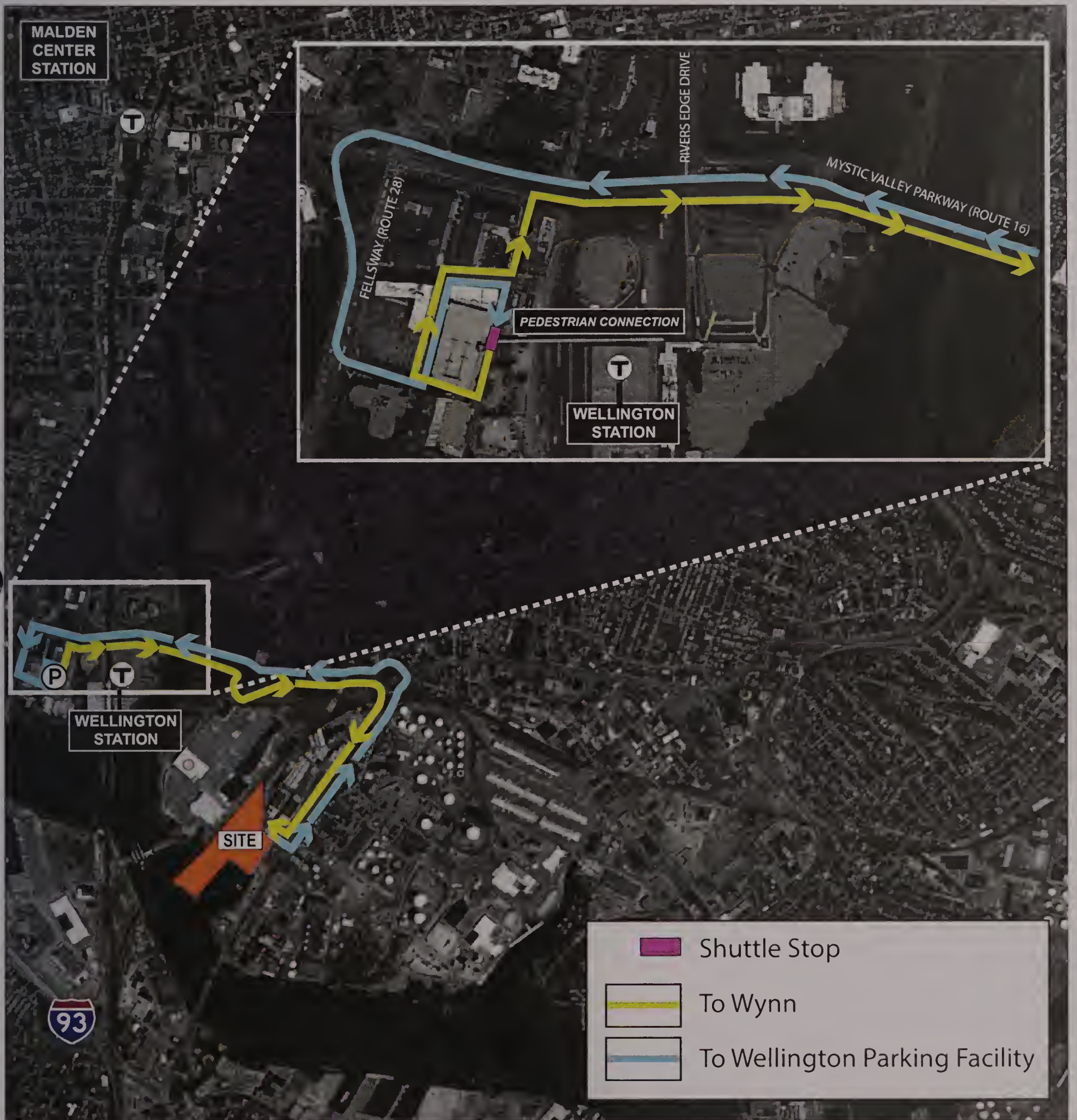
Saturday Conditions



Wynn Resort in Everett
Everett, Massachusetts

Figure 2-110
Wynn Patron Shuttle to/from Malden Station Ridership and Shuttle Trips per Hour Saturday Conditions
Source: Howard/Stein-Hudson Associates, Inc., 2015







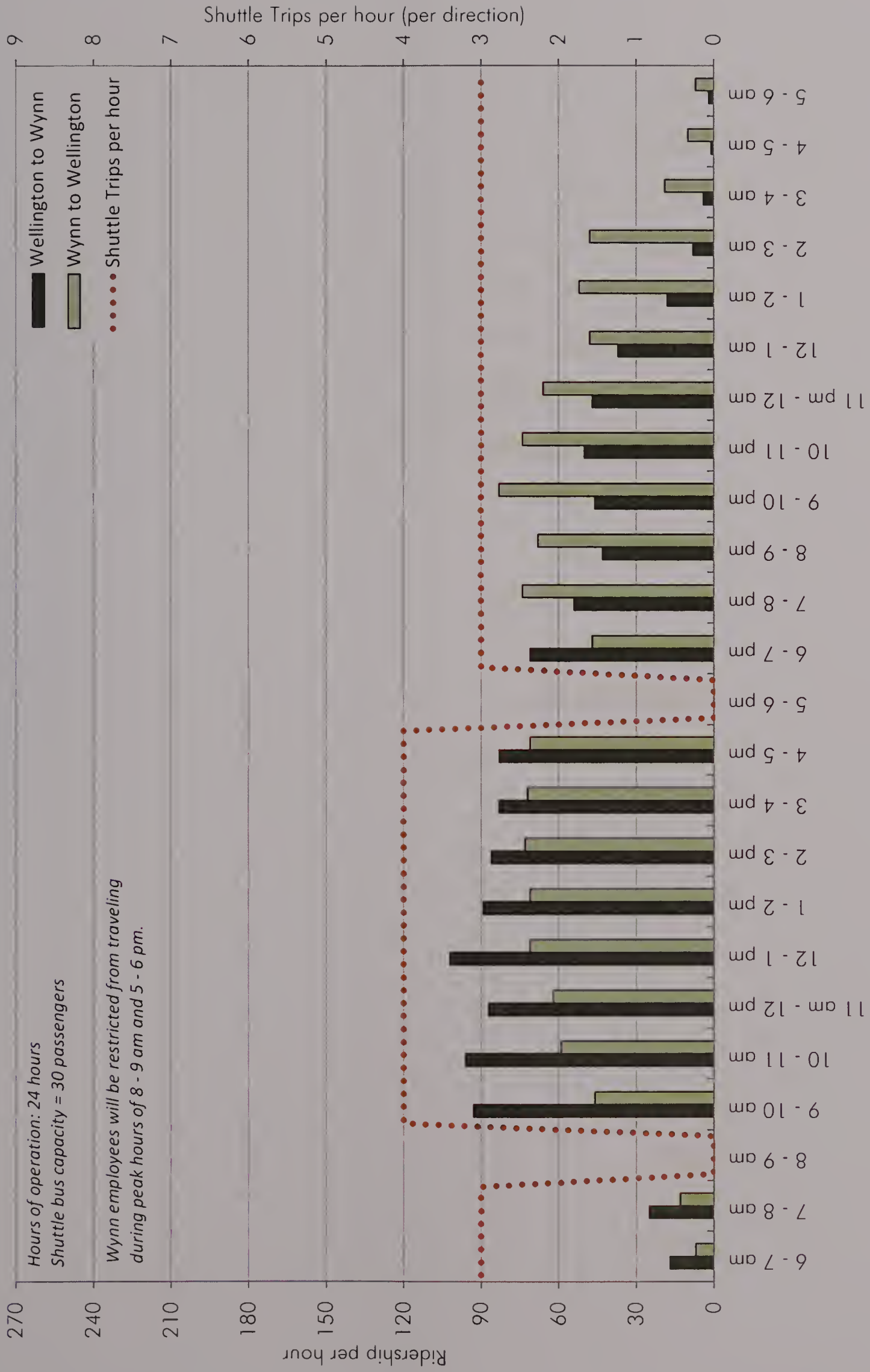






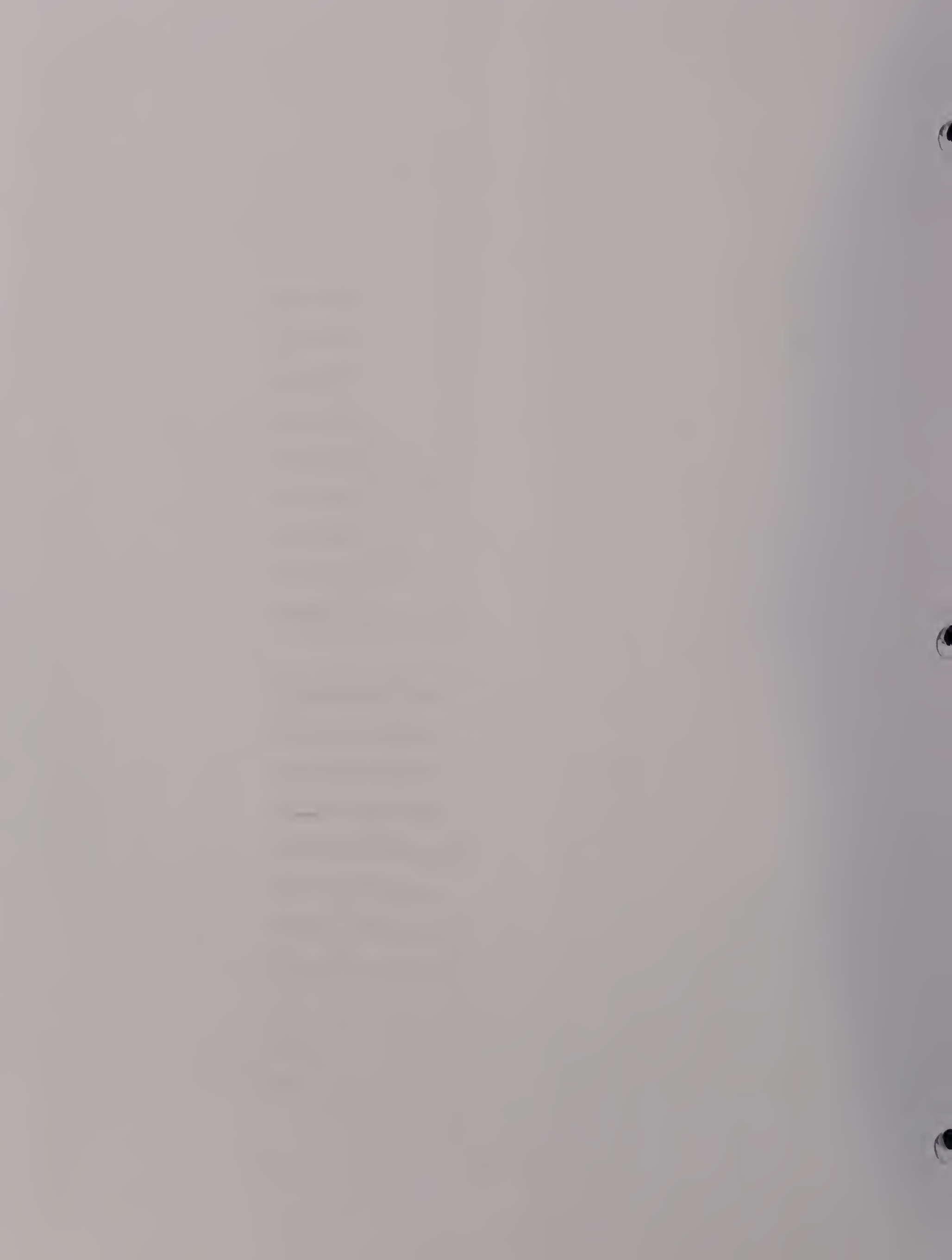


Friday Conditions

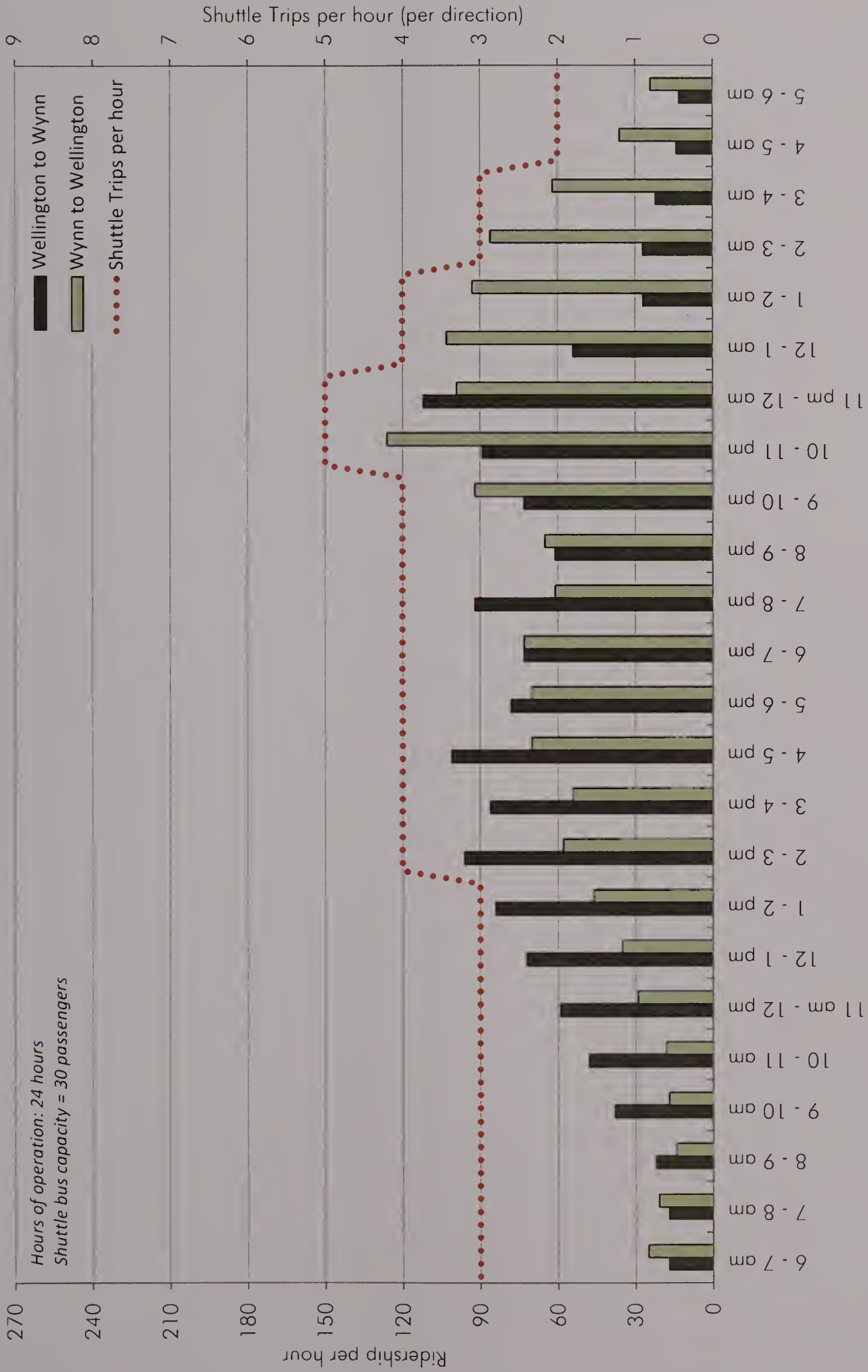


Wynn Resort in Everett
Everett, Massachusetts

Figure 2-114
Wynn Employee Shuttle to/from Wellington Station/Parking Facility Ridership and Shuttle Trips per Hour Friday Conditions
Source: Howard/Stein-Hudson Associates, Inc., 2015

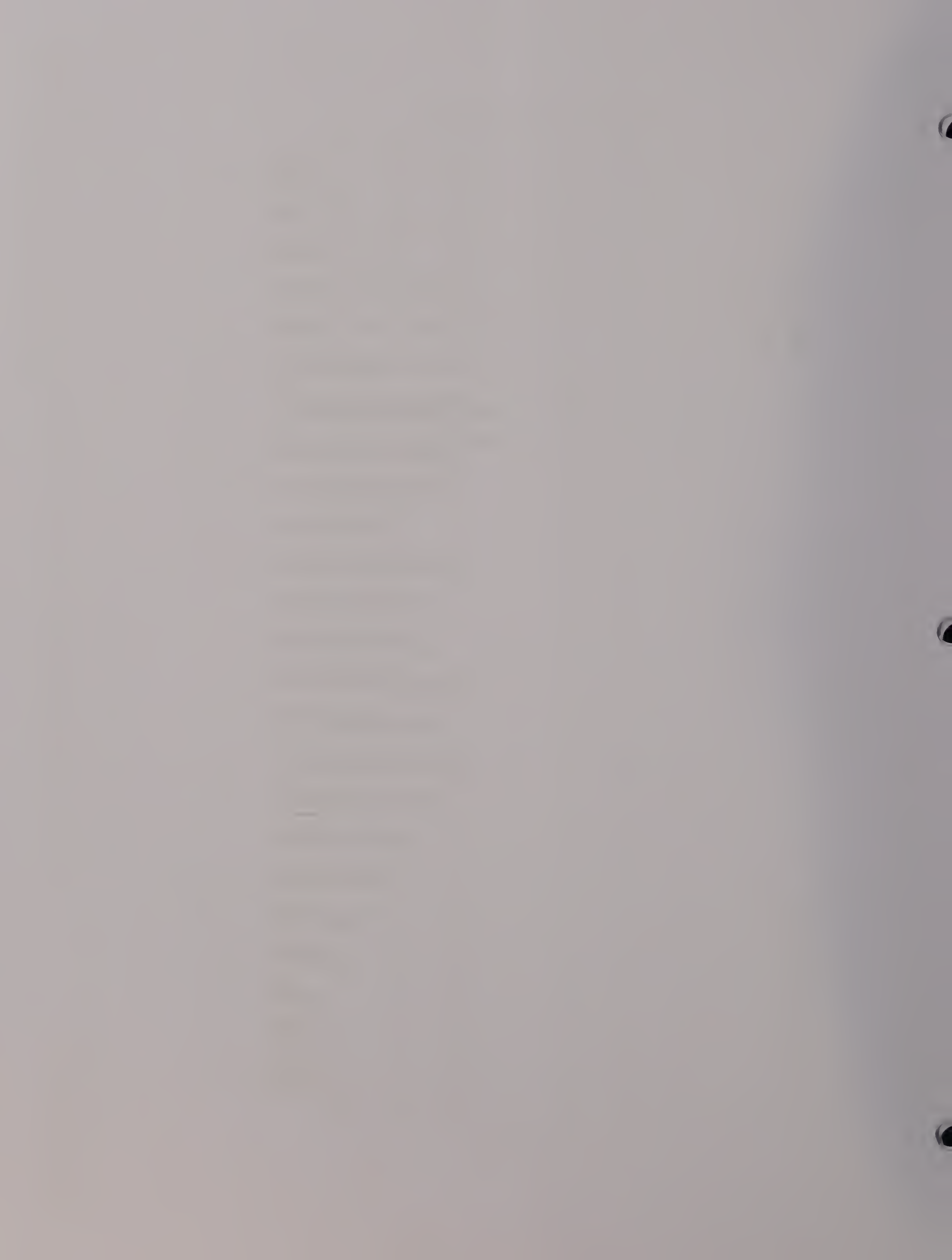


Saturday Conditions

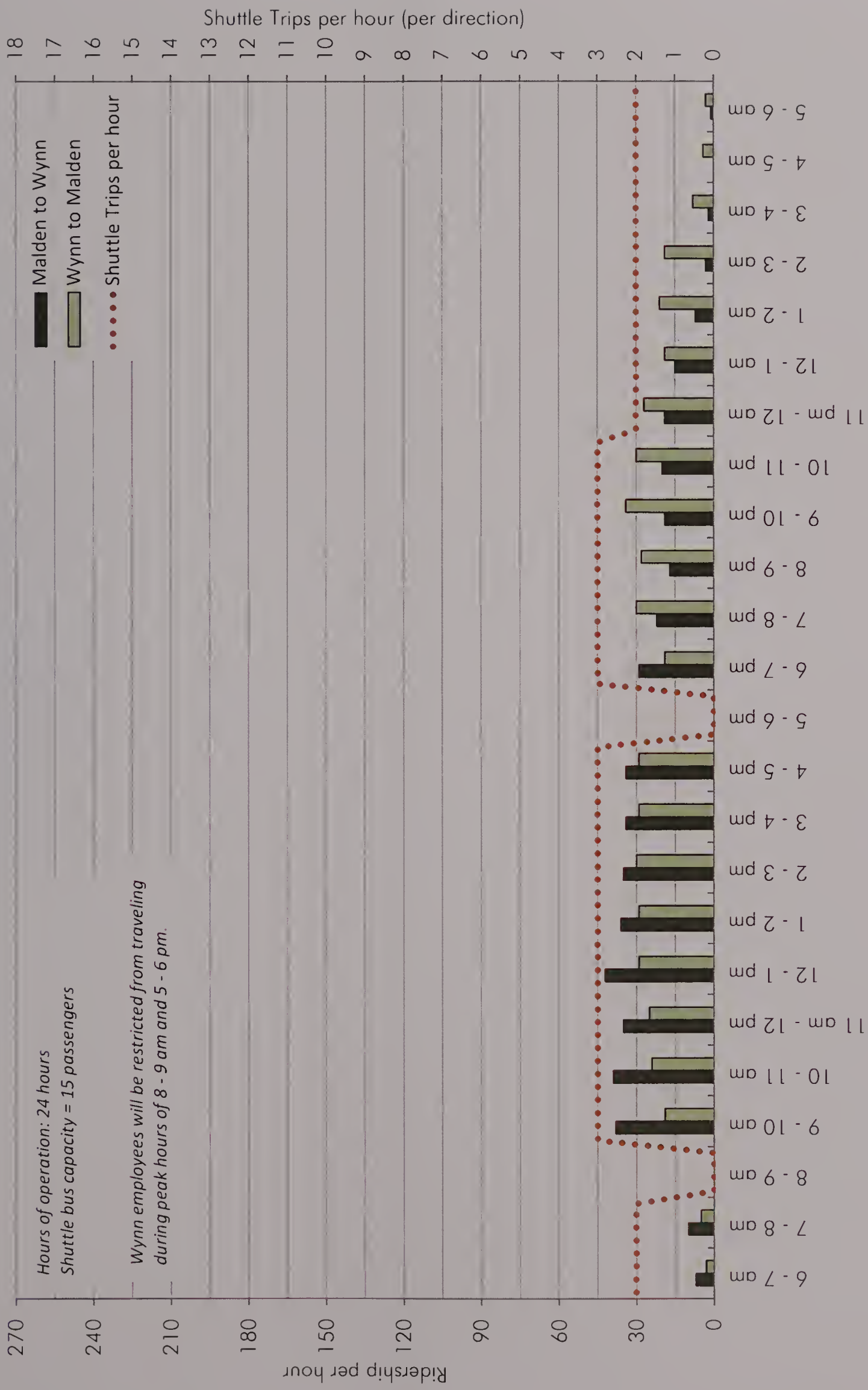


Wynn Resort in Everett
Everett, Massachusetts

Figure 2-115
Wynn Employee Shuttle to/from Wellington Station/Parking Facility Ridership and Shuttle Trips per Hour Saturday Conditions
Source: Howard/Stein-Hudson Associates, Inc., 2015

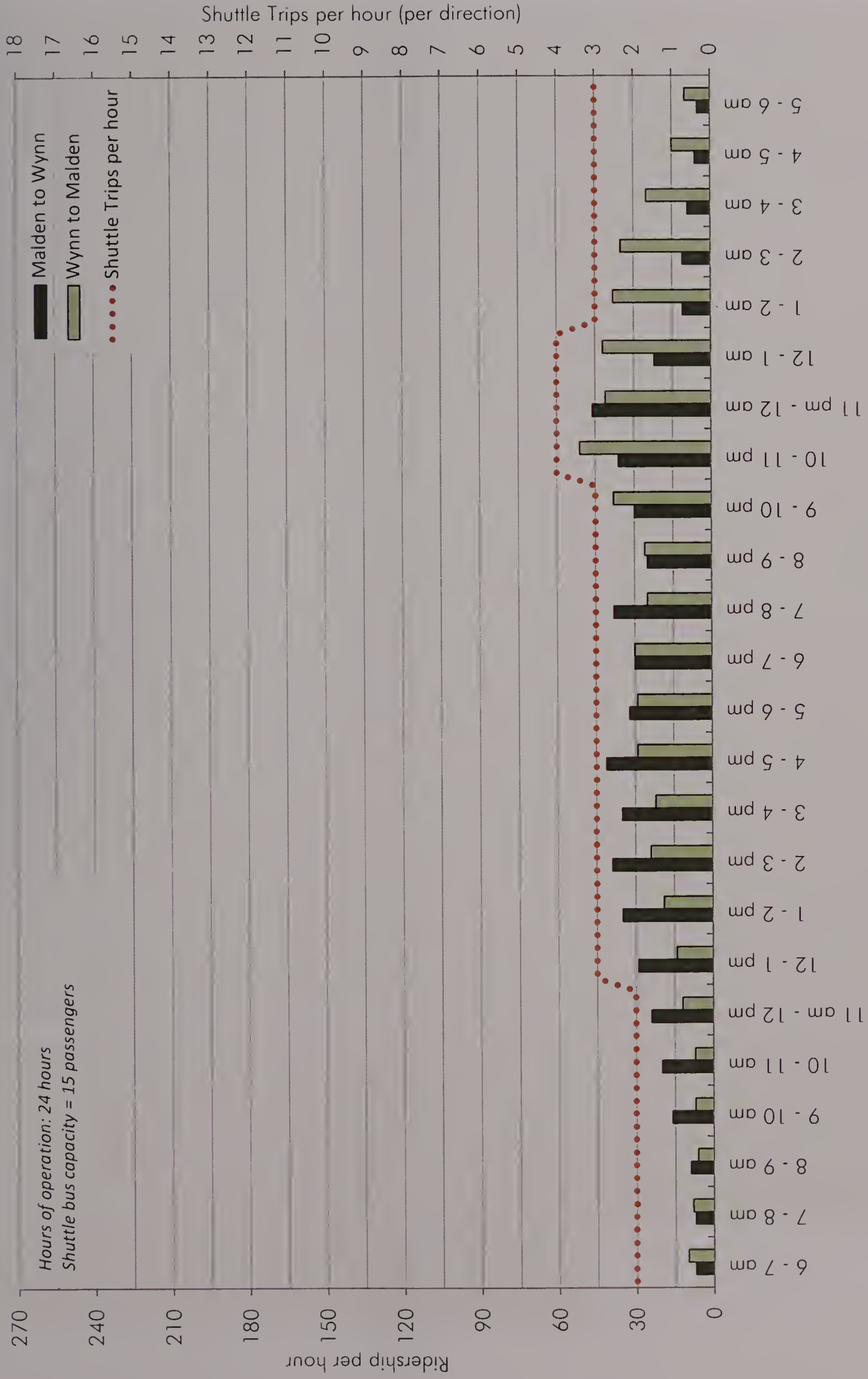


Friday Conditions



|||

Saturday Conditions



Wynn Resort in Everett
Everett, Massachusetts

Figure 2-117
Wynn Employee Shuttle to/from Malden Parking Facility Ridership and Shuttle Trips per Hour Saturday Conditions
Source: Howard/Stein-Hudson Associates, Inc., 2015

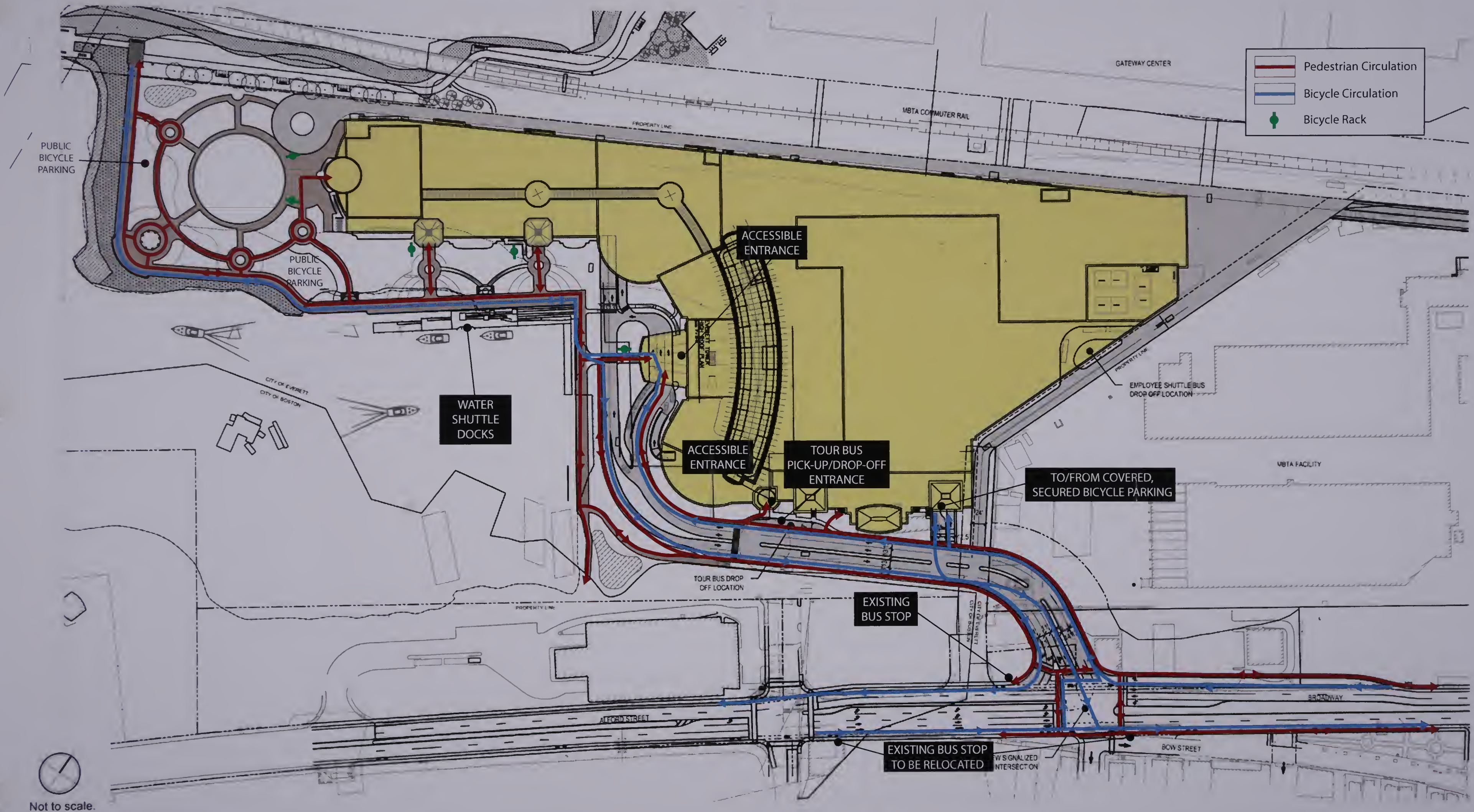


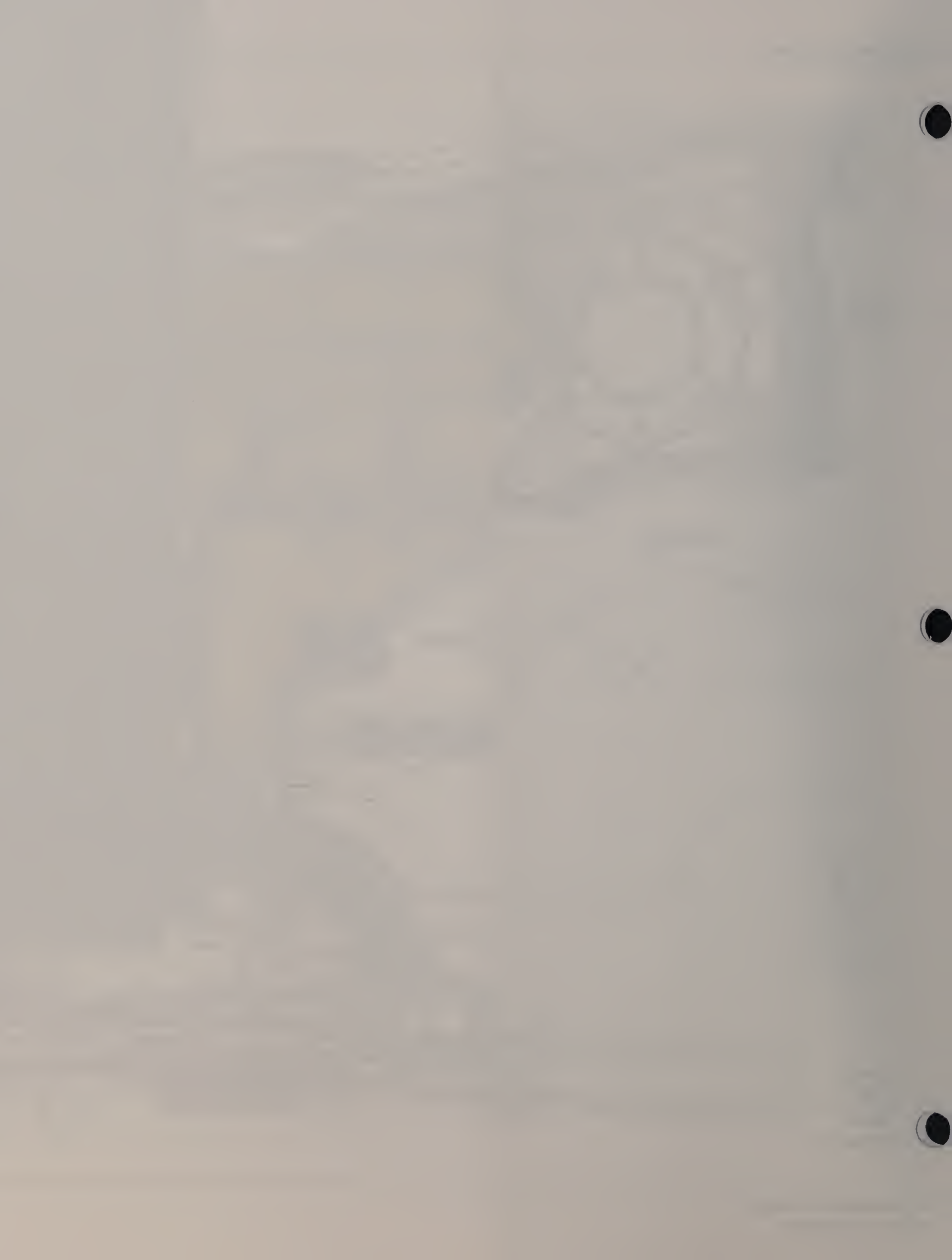












Chapter 3

MITIGATION MEASURES AND SECTION 61 FINDINGS

CHAPTER 3: MITIGATION MEASURES AND SECTION 61 FINDINGS

3.1 SUMMARY OF MITIGATION AND ENHANCEMENT MEASURES

As required by the Secretary's Certificate, this chapter presents the revised mitigation commitments for the Project, including draft Section 61 findings for each state agency that will issue permits for the Project. The sections below summarize the mitigation and enhancement measures associated with permits required from, or actions by, each state agency in text and tabular form as well as draft Section 61 findings for each of those state agencies provided in Section 3.3 below.

3.2 OVERVIEW OF MITIGATION PROPOSED FOR THE PROJECT

In addition to substantial mitigation and enhancement measures associated with state permits or actions, the Project also includes substantial benefits for the Project's host, surrounding and neighboring communities as described in Section 3.2.1 below.

The Project also includes mitigation measures to enhance wetlands and waterways resources, reduce greenhouse gas emissions, water use, waste water, stormwater impacts, construction period impacts, and the remediation of contamination itemized in Table 3-4: Summary Table of All Proposed Project Mitigation Measures by Wynn MA, LLC, included in the Massachusetts Gaming Commission Draft Section 61 Finding in Section 3.3.5.

3.2.1 PUBLIC BENEFITS TO HOST, SURROUNDING AND NEIGHBORING COMMUNITIES

3.2.1.1 PUBLIC BENEFITS TO THE HOST COMMUNITY

As outlined in the Host Community Agreement, the Project will provide tens of millions of dollars in short term and long term revenues, construction as well as permanent jobs, and public realm improvements to the City of Everett and the regional economy.

Community Enhancement Fee

The Proponent will, during the construction phase of the Project, provide the City of Everett with payments totaling Thirty Million Dollars (\$30,000,000) to be used for capital improvements projects identified by the City of Everett.

New Real and Personal Property Tax Revenue

The Proponent will, after opening, provide the City of Everett with annual payments in lieu of real estate taxes starting at Twenty Million Dollars (\$20,000,000), which will increase by two and one-half percent (2.5%) annually.

Community Impact Fee

The Proponent will, after opening, provide the City of Everett with annual community impact payments starting at Five Million Dollars (\$5,000,000), which will increase by two and one-half percent (2.5%) annually.

Everett Citizens Foundation

The Proponent will, after commencing construction, fund an Everett Citizens Foundation with annual payments starting at Two Hundred Fifty Thousand Dollars (\$250,000), which will increase by two and one-half percent (2.5%) annually. The Everett Citizens Foundation will support and promote local groups, associations and programs with important City initiatives for the benefit of the City of Everett's residents.

Single Phase Construction

The Proponent will construct the Project and open in a single phase ensuring that the City of Everett and the Commonwealth benefit as soon as possible from the completion of the Project, and eliminating any risk that committed improvements are delayed.

Tax Revenues

The Project will generate significant new tax revenue at the state and local levels in the form of sales taxes, hotel taxes, food and beverage taxes, as well as the taxes on gross gaming revenues discussed in Section 1.3. These gaming revenue taxes include over \$200 million annually to be allocated for high priority needs of the Commonwealth and of cities and towns. These funds will be used for local aid, community mitigation, tourism, debt reduction, transportation infrastructure and public health, among other uses.

New Jobs

The Project will provide approximately 4,000 construction jobs and approximately 4,000 permanent resort jobs, the latter of which will

encompass job categories such as hotel/resort personnel, facility employees, food and beverage employees, gaming employees, and management and will include full job training, benefits and opportunities for career advancement. In accordance with the Host Community Agreement, and to the extent permitted by law, the Proponent will give reasonable preference to properly qualified residents from the City of Everett.

Support for Local Businesses

The Proponent will make a good faith effort to use local contractors and suppliers for both construction and future operations, including actively soliciting bids from vendors based in the City of Everett and in coordination with the Everett Chamber of Commerce. In accordance with the terms of the Host Community Agreement, the Proponent will also purchase and issue at least \$50,000 in vouchers and gift certificates annually from businesses in the City of Everett. The Proponent also intends to partner with the City of Everett and hotels, restaurants, entertainment venues and tourism organizations in the region to attract visitors and boost the local economy. The Proponent has also agreed to use good faith efforts to purchase at least \$10 million per year of goods and services from vendors with a principal place of business in the City of Everett.

Roadway Improvements

The Project will provide significant transportation infrastructure improvements to the surrounding roadway network that will improve existing conditions and accommodate Project-generated trips. Proposed infrastructure improvements are identified in Section 3.5 of this chapter.

Public and Alternative Mode Transportation Enhancements

The Project will utilize and enhance public transportation and alternative non-vehicular transportation resources in the area. As discussed in Section 3.5, the Project will provide enhancements including fixed-route shuttle bus service, new MBTA bus stops, a new water shuttle service, and bicycle and pedestrian amenities.

Environmental Remediation

Historic use of the Project Site as a chemical manufacturing plant has resulted in significant environmental contamination that has impeded redevelopment, leaving this large waterfront parcel, which is critical to

the City of Everett's development plans, blighted and vacant. Remediation activities conducted in accordance with the Massachusetts Contingency Plan ("MCP"), at an estimated cost of \$22 to \$31 million, will make the Project Site safe for beneficial reuse as a casino, retail, and public waterfront facility.

Open Space, Waterfront Access, and Shoreline Enhancement

The Project will also revitalize the previously inaccessible and blighted Lower Broadway waterfront for public access, use and enjoyment. Planned improvements include significant open space and public amenities along the water's edge, extending the existing waterfront trail, and creating pedestrian and bicycle connections between the DCR Gateway Park and the Lower Broadway District of the City of Everett. A restored coastal bank and salt marsh will be part of the Project.

Sustainable Design/Green Building

The Proponent will set a new standard of excellence in sustainable design for gaming development projects. Designed to achieve LEED Gold or higher, the Project will be sustainable, energy efficient, environmentally conscious, and healthy for its employees and visitors. Innovative technologies to reduce environmental impact have been incorporated into the Project design.

City of Everett Infrastructure Improvements

The Proponent has agreed to upgrade as necessary the streetscape, natural gas, water and sewer infrastructure, and other infrastructure as needed.

Water Quality Improvements

The Project will implement a comprehensive stormwater management plan which will lead to enhanced water quality in Everett and the Mystic River.

Support for Local Arts

The Project will support the arts and local artists by periodically hosting or providing space for community shows, exhibits, concerts, and other local cultural and arts programs. Programming will be designed to be used and enjoyed by residents of the City of Everett, including in the Project's new waterfront gathering spaces.

3.2.1.2 PUBLIC BENEFITS TO SURROUNDING AND NEIGHBORING COMMUNITIES

In accordance with the terms of the Gaming Act, the Proponent entered into surrounding community agreements with the City of Malden on November 12, 2013, the City of Medford on April 11, 2014, the City of Cambridge on April 22, 2014 and the City of Somerville on June 12, 2014. The Proponent also entered into Neighboring Community Agreements with the City of Lynn and the City of Melrose on January 28, 2014. The Chelsea Surrounding Community Agreement was established by arbitrator's award on June 9, 2014. The Proponent designated the City of Boston as a "Surrounding Community," however the City of Boston declined to participate in the arbitration process established pursuant to the terms of the Gaming Act, thereby relinquishing its designation. As a result, the Proponent agreed to certain specified conditions in the Gaming License for the purpose of mitigating any adverse impacts to the City of Boston and, in particular, the Charlestown neighborhood.

The host, surrounding and neighboring agreements may be found at <http://massgaming.com/about/host-surrounding-communities/surrounding-community-agreements/>. A summary of mitigation measures included in the surrounding and neighboring communities follows.

Malden Surrounding Community Agreement

The Malden Surrounding Community Agreement recognizes the City of Malden's role as a transportation hub for the Project and commits to mitigation in the form of funding to support transitional road improvements, subsidies for public safety (such as increased police, fire, traffic and works personnel to maintain roadway safety) related to its role as a transportation hub, efforts to mitigate any adverse business impacts (such as agreements regarding good faith efforts to use local contractors, and a voucher/gift certificate program for the Proponent's employees to incentivize patronage of Malden businesses), a job preference for residents of the City of Malden, a community fund to support nonprofit organizations, and funding for up to twenty-five percent of a concept design study for Wellington Circle. The Proponent has also agreed to use good faith efforts to purchase at least \$10 million per year of goods and services from vendors with a principal place of business in the City of Malden.

On November 20, 2014, the Proponent made its initial payment to the City of Malden in the amount of \$1,000,000, and will make annual recurring payments, following the opening of the Project, to the City of Malden in the amount of \$1,000,000, which will increase by two and one-half percent (2.5%) annually with a further adjustment on the fifth (5th) annual payment.

Medford Surrounding Community Agreement

As with Malden, the Medford Surrounding Community Agreement recognizes Medford's role as a transportation hub for the Project and commits mitigation in the form of funding to support transitional road improvements, subsidies for public safety (such as increased police, fire, traffic and works personnel to maintain roadway safety), efforts to mitigate any adverse business impacts (such as agreements regarding good faith efforts to use local contractors and a voucher/gift certificate program for Wynn employees to incentivize patronage of Medford businesses), funding to support water transportation, a job preference for Medford residents, approximately \$1,000,000 for transportation improvements in accordance with the MEPA process, and funding for up to twenty-five percent of a concept design study for Wellington Circle (up to \$1,500,000). The Proponent has also agreed to use good faith efforts to purchase at least \$10 million per year of goods and services from vendors with a principal place of business in the City of Medford.

The Proponent made its initial payment to the City of Medford in the amount of \$250,000 dedicated to the Krystle Campbell Peace Garden and Memorial Park, and will make annual recurring payments, following the opening of the Project, to the City of Medford in the amount of \$1,000,000, which will increase by five percent (5.0%) after the payment of the first fifteen payments.

Cambridge Surrounding Community Agreement

The Cambridge Surrounding Community Agreement includes mitigation in the form of efforts to mitigate any adverse business impacts (such as agreements regarding good faith efforts to use local contractors and a voucher/gift certificate program for Wynn employees to incentivize patronage of Cambridge businesses), funding to support water transportation, a job preference for Cambridge residents, and mitigation to address transportation impacts.

The Proponent made its initial payment to the City of Cambridge in the amount of \$200,000 to enable the City of Cambridge to study and/or

make certain improvements to the Land Boulevard/O'Brien Highway intersection, and will make annual recurring payments, following the opening of the Project, to the City of Cambridge in the amount of \$100,000.

Somerville Surrounding Community Agreement

The Somerville Surrounding Community Agreement includes mitigation in the form of funding to support road improvements, subsidies for public safety (such as increased police, fire, traffic and works personnel to maintain roadway safety), efforts to mitigate any adverse business impacts (such as agreements regarding good faith efforts to use local contractors and a voucher/gift certificate program for the Proponent's employees to incentivize patronage of Somerville businesses), funding to support water transportation, a job preference for residents of Somerville, a community fund to support nonprofit organizations, improvements to Wellington Circle and Sullivan Square in accordance with the MEPA process, and funding for up to twenty-five percent of a concept design study for Wellington Circle. The Proponent has also agreed to use good faith efforts to purchase at least \$10 million per year of goods and services from vendors with a principal place of business in the City of Somerville.

The Proponent made its initial payment to the City of Somerville in the amount of \$150,000 for the purpose of reimbursing Somerville for expenses incurred by the City of Somerville for legal, financial and other professional services related to evaluating the impact of the Project, and will make annual recurring payments, following the opening of the Project, to the City of Somerville in the amount of \$650,000, which will increase by five percent (5.0%) after the payment of the first fifteen payments.

Chelsea Surrounding Community Agreement

The Chelsea Surrounding Community Agreement includes mitigation in the form of funding to support road improvements, subsidies for public safety (such as increased police, fire, traffic and works personnel to maintain roadway safety), efforts to mitigate any adverse business impacts (such as agreements regarding good faith efforts to use local contractors and a voucher/gift certificate program for Wynn employees to incentivize patronage of Chelsea businesses), a job preference for residents of Chelsea, a community fund to support non-profit organizations, and approximately \$275,000 for transportation

improvements in accordance with the MEPA process. The Proponent has also agreed to use good faith efforts to purchase at least \$2.5 million per year of goods and services from vendors with a principal place of business in the City of Chelsea.

The Proponent made its initial payment to the City of Chelsea in the amount of \$300,000 for the purpose of enabling the City of Chelsea to make certain roadway improvements on all transitional roads in preparation for the Project, and will make annual recurring payments, following the opening of the Project, to the City of Chelsea in the amount of \$650,000, which will increase by five percent (5.0%) after the payment of the first fifteen payments.

Lynn Neighboring Community Agreement

The Lynn Neighboring Community Agreement recognizes that the City of Lynn is unlikely to experience significant adverse impacts associated with the Project but provides that the parties will meet in a good faith effort to address any impacts that arise. The agreement provides for the inclusion of the City of Lynn in the Proponent's proprietary concierge program for the purpose of cross-marketing the City of Lynn's cultural, historical and entertainment attractions, participation in the Proponent's WE Save program to provide opportunities for local businesses to market themselves to the Proponent's 4,000 employees, business development opportunities for local businesses, a jobs program, and a community fund to support nonprofit organizations.

Melrose Neighboring Community Agreement

The Melrose Neighboring Community Agreement recognizes that the City of Melrose is unlikely to experience significant adverse impacts associated with the Project but provides that the parties will meet in a good faith effort to address any impacts that arise. The agreement provides for the inclusion of the City of Melrose in the Proponent's proprietary concierge program for the purpose of cross-marketing the City of Melrose's cultural, historical and entertainment attractions, participation in Proponent's WE Save program to provide opportunities for local businesses to market themselves to Proponent's 4,000 employees, business development opportunities for local businesses, a jobs program, and a community fund to support nonprofit organizations

Gaming License Conditions for the City of Boston

Mitigation Payments:

The Proponent designated the City of Boston as a "Surrounding Community," however the City of Boston declined to participate in the arbitration process established pursuant to the terms of the Gaming Act thereby relinquishing its designation. As a result, the Proponent agreed to certain specified conditions in the Gaming License for the purpose of mitigating any adverse impacts to the City of Boston and, in particular, the Charlestown neighborhood. The conditions set forth in the Gaming License include a one-time, pre-opening payment by the Proponent of \$1,000,000. Per the Gaming License, this payment can be used to support Charlestown's non-profits organizations, parks, after-school activities, senior programs, job training programs, cultural events and related activities that promote Charlestown's heritage, quality of life, recreational and cultural activities. On January 6, 2015, the Proponent delivered this initial payment to the MGC following the City of Boston's refusal to accept the payment. The MGC continues to hold this payment in escrow for the City of Boston's benefit.

Following the opening of the Project, the Proponent has agreed to annual payments to the City of Boston in the amount of \$1,600,000, adjusted annually to reflect increases in the Consumer Price Index. The annual payments are to be used for "Other Mitigation" including; (i) staffing and other public safety initiatives related to increased pedestrian and vehicular traffic in the Boston related to the Project; (ii) improvements to facilities within Boston to facilitate water transportation and to fund staffing and other public safety initiatives related to increased use of water transportation in the Boston Harbor related to the Project in Everett; (iii) support of Charlestown's non-profits organizations, parks, after-school activities, senior programs, job training programs, cultural events and related activities that promote Charlestown's heritage, quality of life, recreational and cultural activities including, without limitation, the Charlestown Little League and Charlestown Youth Hockey programs; and (iv) any other impacts including any transportation infrastructure impacts.

In addition, the Proponent has agreed to reimburse the City of Boston for actual, documented reasonable out-of-pocket expenses, not to exceed \$750,000, incurred by the City for legal, financial and other professional services to determine the impact of the Project.

In addition to the improvements to Sullivan Square and Rutherford Avenue detailed herein, the Proponent has agreed to make a payment of \$25 million for the long-term solution to alleviate traffic congestion in Sullivan Square and the roads leading into and/or connected to Sullivan

Square. This payment will be made over a ten year period following the opening of the Project. Finally, 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 afternoon peak hour in excess of the number of vehicle trips entering and leaving the Project using Sullivan Square during the Friday afternoon peak hour shown in the data used by the City of Boston as the basis for its issuance of any required permits necessary for the Proponent's Sullivan Square mitigation plan. This payment would be an annual payment for the first ten years following the opening of the Project, and is capped at \$20 million.

Business Development:

Pursuant to the Gaming License, the Proponent has also agreed to cooperate with the City of Boston's Chamber of Commerce to include Boston businesses in the Proponent's proprietary concierge program for the purpose of cross-marketing and promoting City of Boston local businesses and other attractions. The Proponent will also work with and assist local businesses in the City of Boston to become "Wynn certified" in order to participate in this local purchasing program. The Proponent has also agreed to use good faith efforts to purchase at least \$15 million per year of goods and services from vendors with a principal place of business in the City of Boston.

Jobs Program:

Subject to its obligations to the City of Everett and other surrounding communities and other legal requirements, the Proponent has agreed to provide preferential treatment to qualified City of Boston residents and, in particular, residents of Charlestown, for contracting, subcontracting and servicing opportunities in the development and construction of the Project, including by advertising and holding an employment informational event at least one event every 6 months prior to opening for City of Boston residents at a venue in Charlestown. Prior to beginning the process of hiring employees (other than internally) for operations, the Proponent has agreed to advertise and hold at least one employment informational event for City of Boston residents at a venue located in Charlestown, and shall hold one event annually thereafter. In addition, the Proponent has agreed to work with non-profit organizations to develop a job readiness training program that will be available to all residents of the City of Boston.

3.3 DRAFT SECTION 61 FINDINGS

Massachusetts General Laws Chapter 30, Section 61 requires state agencies and authorities, when approving, providing land or funding for, or undertaking a project, to evaluate and determine whether the project causes any damage to the environment, and to make a written finding describing that determination and confirming that all feasible measures have been taken to avoid, minimize and mitigate any damage to the environment. Under the MEPA regulations, an agency's Section 61 findings are directed to those aspects of the project that are within the subject matter scope of the agency's respective permit or within the geographic area subject to a land transfer.

State agencies expected to make Section 61 findings for the Project prior to issuing approvals for implementing the Project include MassDEP, MassDOT, DCR, MWRA, and the MGC.

The following draft Section 61 findings reflect the mitigation measures related to each of the following agencies' jurisdictions. As required by the Secretary's Certificate, the estimated costs and implementation schedule for these mitigation measures are included in the draft Section 61 findings.

3.3.1 DRAFT MASSACHUSETTS DEPARTMENT OF TRANSPORTATION SECTION 61 FINDINGS

Introduction

These Section 61 Findings for Wynn Resort in Everett (EEA #15060) have been prepared in accordance with the provisions of M.G.L. c. 30, Section 61 and 301 CMR 11.00 and cover potential state agency actions of the Massachusetts Department of Transportation Highway Division, Rail and Transit Division/MBTA and Aeronautics Division.

The following permits and approvals will be required from the Department:

- Vehicular Access Permit (Category III) (Highway Division)
- Non-Vehicular Access Permit (Highway Division)
- Airspace Review (Aeronautics Division)
- Land Disposition and Easement Agreements (Rail and Transit Division/MBTA)

- Agreements and approvals necessary to construct improvements and to operate within MBTA transit stations and agreements and approvals necessary to relocate bus stops (Rail and Transit Division/MBTA)

Project Description

The Wynn Resort in Everett (the "Project") will consist of a luxury hotel with 629 rooms, a gaming area, retail space, food and beverage outlets, convention and meeting space, a spa and gym, and a parking garage and drop-off areas to be constructed on a waterfront parcel totaling approximately 33.9 acres located in Everett, Massachusetts, adjacent to the Mystic River (the "Project Site"). Extensive landscape and open space amenities are planned which include a public gathering area with an outdoor park-like open space, a pavilion, waterfront features, a public harborwalk, and water transportation docking facilities. The Proponent has also committed to certain off-site improvements including extensive transportation improvements and a multiuse path connector ("Gateway Park Connector") from the proposed harborwalk on the Project Site to the existing paths at the Massachusetts Department of Conservation and Recreation ("DCR") Gateway Park. The Project will be developed in a single phase.

MEPA History

The Expanded Environmental Notification Form ("ENF") for the Project was filed on May 31, 2013. The Secretary of Energy and Environmental Affairs (the "Secretary") issued the Certificate on the ENF on July 26, 2013. The Draft Environmental Impact Report ("DEIR") was filed with the MEPA Office on December 16, 2013 and the Secretary issued a Certificate on the DEIR on February 21, 2014, setting forth a scope for the Final Environmental Impact Report ("FEIR"). The FEIR for the Project was prepared and filed on June 30, 2014. The Secretary issued a Certificate on the FEIR specifying the scope for a Supplemental Final Environmental Impact Report ("SFEIR") on August 15, 2014. The SFEIR for the Project was filed on February 17, 2015. On _____, 2015, the Secretary issued a Certificate on the SFEIR finding that the SFEIR adequately and properly complied with the Massachusetts Environmental Policy Act and its implementing regulations.

Project Impact Evaluation

The proposed Project will result in the generation of new vehicle and transit trips to the Project. The increase in new vehicle trips is estimated at 1,368 trips in the Friday p.m. peak hour of the resort (9:00-10:00 p.m.), and 1,810 trips in the Saturday p.m. peak hour (10:00-11:00 p.m.). New vehicle trips will result in increased volumes on several roadways under MassDOT or DCR jurisdiction, including Route 16 at Wellington Circle, Santilli Circle and Sweetser Circle, elsewhere along Route 16, and the I-93 off ramp at Sullivan Square. Improvements

are proposed at Wellington Circle, Santilli Circle and Sweetser Circle, other intersections along Route 16, and at Sullivan Square. Based on MassDOT's evaluation of the assessments presented and reviewed under MEPA, MassDOT finds that the roadway improvements and other measures proposed will adequately mitigate the Project's vehicular traffic impacts.

Based on the proposed Transportation Demand Management ("TDM") program, many trips to the Project will occur on transit and non- single occupancy vehicles ("SOVs"). New transit and other non-SOV person trips are estimated at 979 trips in the Friday p.m. peak hour. In addition, improvements are proposed at the Sullivan Square Station, Wellington Station, and Malden Center MBTA Stations and at bus stops along Lower Broadway/Alford Street (Route 99) in the City of Everett to enhance bus and/or shuttle bus access and utilization.

Specific Mitigation Measures

As part of the MEPA review process, the Project has committed to specific mitigation measures related to MassDOT's jurisdiction as further described in the Secretary's Certificate. Those mitigation measures are listed below.

Table 3-1: Proposed Transportation Mitigation Measures by Wynn MA LLC¹

Subject Matter	Improvement Measure	Estimated Cost	Schedule
Offsite Improvements – Everett:			
1. Revere Beach Parkway (Route 16)/Mystic View Road/Santilli Highway/ Route 99 Connector Improvements (Santilli Circle)	<ul style="list-style-type: none"> – Modify the approach from Frontage Road into the rotary to allow for two formal lanes. – Widen circle at Santilli Highway approach to allow for three travel lanes. – Provide improved pedestrian and bicycle connection from Frontage Road to Mystic View Road. – Reconfigure channelizing island on south side of rotary near Mystic View Road. – Provide traffic signal improvements at the signalized locations around the traffic circle. 	\$4.1 million	Prior to opening

¹ Note that off-site improvements will either be funded or constructed by the Proponent.

Subject Matter	Improvement Measure	Estimated Cost	Schedule
	<ul style="list-style-type: none"> - Provide landscaping improvements to the center of the circle. - Provide new guide signage and pavement markings. - Perform RSA during 25% design. 		
2. Route 16/ Broadway/ Main Street (Sweetser Circle)	<ul style="list-style-type: none"> - Reconstruct circle and approaches to function as a two-lane modern roundabout - Reconfigure the existing Broadway (Route 99) northbound approach to allow for three travel lanes providing free flow access to Route 16 eastbound. - Provide shared use path on northwest side of rotary to improve bicycle access. - Install new signing to provide direction to bicyclists on how to navigate the rotary safely. - Provide landscaping and improvements on the north side of the circle. - Maintain pedestrian signal across Route 16 eastbound exit from rotary. 	\$2 million	Prior to opening
3. Broadway/ Beacham Street 4. Broadway/ Horizon Way 5. Broadway/ Lynde Street 6. Broadway/ Thorndike Street 7. Bow Street/Mystic Street 8. Bow Street/Lynde Street 9. Bow Street/ Thorndike Street 10. Beacham Street/Robin Street 11. Broadway/	<ul style="list-style-type: none"> - Reconstruct Lower Broadway as a 4-lane boulevard with turn lanes at major intersections - Upgrade/replace/install traffic control signals - Reconstruct sidewalks and bicycle lanes where required - Install street trees and lighting - Improve MBTA bus stops along Lower Broadway - Installation of technology along Broadway/Alford Street (Route 99), near 	\$4 million	Prior to opening

Subject Matter	Improvement Measure	Estimated Cost	Schedule
Bowdoin Street	project entrance, to allow for signal prioritization for buses (cost?)		
12. Broadway/ Norwood Street/Chelsea Street	– Optimize traffic signal timing, phasing and coordination	\$75,000	Prior to opening
12. Lower Broadway Truck Route	<ul style="list-style-type: none"> – Upgrade Robin Street and Dexter Street to serve as a truck route – Provide full depth reconstruction of the existing roadway to accommodate heavy vehicles – Includes reconstruction of Robin Street and Dexter Street to include heavy-duty pavement, corner radii improvements, sidewalk reconstruction (where present), drainage system modifications (minor), signs and pavement markings. 	\$4.3 million	Prior to opening
13. Ferry Street/ Broadway (Route 99)	– Traffic signal retiming and optimization	\$20,000	Prior to opening
Everett total: \$14,495,000			
Offsite Improvements – Medford:			
1. Mystic Valley Parkway (Route 16)/Fellsway (Route 28)/Middlesex Avenue (Wellington Circle)	<ul style="list-style-type: none"> – Upgrade/replace traffic signal equipment/signs/pavement markings. – Optimize traffic signal timing, phasing and coordination. – Widen Route 28 northbound to provide an additional left turn lane. – Widen Route 16 westbound to provide an additional through lane in the middle of the intersection. – Reconstruct non-compliant sidewalks and accessible ramps around the intersection to 	\$4.0 million	Prior to opening

Subject Matter	Improvement Measure	Estimated Cost	Schedule
	improve pedestrian access. – Provide landscape improvements.		
2. Mystic Valley Parkway (Route 16)/Route 16 Connector 3. Mystic Valley Parkway (Route 16)/Mystic Avenue	– Traffic signal retiming and optimization	\$20,000	Prior to opening
Road Safety Audit	– Perform Road Safety Audit at the intersection of Mystic Valley Parkway (Route 16)/Route 16 Connector	\$15,000	Prior to opening
Wellington Circle study	– Funding for study of long-term alternatives for reconstruction of Wellington Circle.	up to \$1.5 million	Prior to opening
Medford total: \$5,535,000			
Offsite Improvements – Boston:			
1. Alford Street/Main Street/Sever Street/Cambridge Street (Sullivan Square) 2. Cambridge Street/I-93 northbound off-ramp	– Optimize signal timing for Maffa Way/Cambridge Street; interconnect and coordinate traffic signals, widen the Main Street approach to provide two lanes – Reconstruct busway between Cambridge Street and Maffa Way – Reconstruct the southbound approach of Alford Street at Cambridge Street. – Install new traffic signals at Cambridge Street/Spice Street/MBTA Busway and Maffa Way/Busway. Upgrade/replace traffic signal equipment/signs/pavement markings. – Optimize traffic signal timing, phasing and coordination.	\$10.0 million	Prior to opening

Subject Matter	Improvement Measure	Estimated Cost	Schedule
	<ul style="list-style-type: none"> – Reconstruct Spice Street and D Street. – Reconstruct sidewalks on west side of rotary between Sullivan Square station and Alford Street Bridge. – Reconstruct sidewalks and upgrade lighting and streetscape in rotary between Cambridge Street and Main Street (east). – Provide bicycle lanes on Cambridge Street. – Reconstruct MBTA lower busway and parking area at Sullivan Square station, including new traffic signal at Maffa Way/station entrance. – Construct BUS ONLY left-turn lane from Main Street into Sullivan Square Station. 		
3. Traffic Signal Interconnect Conduit from Sullivan Square to Austin Street	<ul style="list-style-type: none"> – Install conduit, pullboxes, and wiring 	\$525,000	Prior to opening
4. Dexter Street/Alford Street (Route 99)	<ul style="list-style-type: none"> – Upgrade/replace traffic signal equipment/signs/pavement markings. – Optimize traffic signal timing, phasing, and coordination. 	Included in cost of Lower Broadway (Route 99) Improvements	Prior to opening
5. Rutherford Avenue (Route 99)/Route 1 Ramps	<ul style="list-style-type: none"> – Optimize traffic signal timing and phasing 	\$20,000	Prior to opening
6. Sullivan Square Landscaping	<ul style="list-style-type: none"> – Improve landscaping within the rotary at Sullivan Square and immediately north of the rotary adjacent to Rutherford Avenue 	\$350,000	Prior to opening
Long-term Commitment to Sullivan Square	<ul style="list-style-type: none"> – Provide payments of \$2.5 million per year into the Sullivan Square mitigation fund 	\$25 million over 10 years	Annually

Subject Matter	Improvement Measure	Estimated Cost	Schedule
Long-term Commitment – Sullivan Square	<ul style="list-style-type: none"> – Provide payments to the City of Boston for each vehicle above Friday afternoon and evening period projections 	\$20,000 per additional vehicle trip, not to exceed \$20,000,000 over 10 years	Monitor and Report no later than 30 days after the first anniversary of Project opening and for 10 years thereafter
Boston total: \$35,895,000 - \$55,895,000			
Offsite Improvements – Revere:			
1. Route 16/Route 1A/Route 60 (Bell Circle)	<ul style="list-style-type: none"> – Upgrade/replace traffic signal equipment/signs/pavement markings – Optimize traffic signal timing, phasing and coordination 	\$550,000	Prior to opening
Revere total: \$550,000			
Offsite Improvements – Chelsea:			
1. Route 16/Washington Avenue	<ul style="list-style-type: none"> – Upgrade/replace traffic signal equipment/signs/pavement markings – Optimize traffic signal timing, phasing and coordination 	\$275,000	Prior to opening
2. Route 16/Everett Avenue 3. Route 16/Webster Avenue	<ul style="list-style-type: none"> – Optimize traffic signal timing, phasing and coordination 	\$30,000	Prior to opening
Chelsea total: \$305,000			
Transportation Demand Management			
Transportation Demand Management	<ul style="list-style-type: none"> - Membership Fee with a Transportation Management Association 	\$10,000/year	At opening and ongoing
	<ul style="list-style-type: none"> - Employ a designated Transportation Coordinator for the Project to coordinate efforts, monitor success rates, and manage strategic implementation of traffic reduction 	\$50,000/year	At opening and ongoing

Subject Matter	Improvement Measure	Estimated Cost	Schedule
	<ul style="list-style-type: none"> programs. - Schedule employee shift beginnings and endings outside specified peak traffic periods. - Carpool/vanpool matching programs. - Dissemination of promotional materials, including newsletters about TDM program in print at the Project's on-site Transportation Resource Center, and online. 		
	<ul style="list-style-type: none"> - Improvements to MBTA's Wellington Station to accommodate Wynn patron shuttle service at curbside. 	\$550,000	Prior to opening
	<ul style="list-style-type: none"> - Improvements to MBTA's Malden Center Station to accommodate Wynn patron shuttle service at curbside. 	\$25,000	Prior to opening
	<ul style="list-style-type: none"> - Patron Orange Line Shuttle Service to Wellington and Malden Center stations - 2 Locations, 20 Minute Headways, 20 Hrs./day, 30-50 passenger vehicles 	\$3,285,000/ year operating costs	At opening and ongoing
	<ul style="list-style-type: none"> - Employee Shuttle Buses - 2 Locations, 20 Minute Average Headways, 24 Hrs./day 	\$2,400,000/ year operating costs	At opening and ongoing
	<ul style="list-style-type: none"> - Premium Park & Ride Shuttle Buses - 3 Locations, 90 Minute Headways, 12 Hrs./day 	\$1,934,500/ year operating costs	At opening and ongoing
	<ul style="list-style-type: none"> - Neighborhood Shuttle Buses - Continuous Loop, 20 Minute Headways, 24 Hrs./day 	\$1,100,000/ year operating costs	At opening and ongoing
	<ul style="list-style-type: none"> - Water shuttle service to the Project Site 	\$3,303,000/ year operating costs	At opening and ongoing

Subject Matter	Improvement Measure	Estimated Cost	Schedule
	- On-site Full Service MBTA Fare Vending Machine	\$35,000	At opening and ongoing
	- Participation in the MBTA Corporate Pass Program to the extent practical and as allowable pursuant to commercial tenant lease requirements	\$400,000	At opening and ongoing
	- Electric vehicle charging stations within the proposed parking garage -. Annual operating cost of \$166,500	Installation cost in Project Construction Costs	At opening and ongoing
	- Car sharing services in the garage at the Project Site	Included in Project Construction Costs	At opening and ongoing
	- Preferential parking for car/vanpools and alternatively fueled vehicles	Included in Project Construction Costs	At opening and ongoing
	- Offering a "Guaranteed-Ride-Home" in case of emergency to employees that commute to the Project by means other than private automobile.	\$10,000/ year	At opening and ongoing
Transportation Demand Total: \$13,269,000			
Water Transportation Vessels	- The Proponent will provide dock facilities and customized ferry vessels to support passenger water transportation service between the Project Site and key Boston Harbor landing sites.	Capital Costs: \$8,600,000	At opening
Water Transportation Total: \$8,600,000			
Annual Monitoring and Reporting Program	- Post-development traffic monitoring and employee survey program in order to evaluate the adequacy of transportation	\$30,000	At opening and ongoing

Subject Matter	Improvement Measure	Estimated Cost	Schedule
	mitigation measures, including the TDM program.		
Sullivan Square traffic monitoring	- Post-development motor vehicle traffic counts in Sullivan Square as well as additional locations to determine whether Project-related vehicle trips through Sullivan Square have exceeded projections.	\$20,000/year for 10 years	No later than 30 days after the first anniversary of Project opening and 10 years thereafter
Annual Monitoring and Reporting Program Total: \$50,000			
Transportation Grand Total Capital Costs: \$65,380,000-\$85,380,000			
Transportation Grand Total Annual Operating Costs: \$13,319,000			

Based upon its review of the MEPA documents, the projected Project impacts and the Department’s regulations, the Department finds that the terms and conditions to be incorporated into the approvals required for this Project as specified above will constitute all feasible measures to avoid damage to the environment, including consideration of the potential effects of climate change, and will minimize and mitigate such damage to the maximum extent practicable for those impacts subject to the Department’s authority. Implementation of the mitigation measures will occur in accordance with the terms and conditions set forth in the applicable permit or approval and the Table of Proposed Transportation Mitigation Measures by Wynn MA LLC above.

Department of Transportation

By

[Date]

3.3.2 DRAFT MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL PROTECTION SECTION 61 FINDINGS

Introduction

These Section 61 Findings for Wynn Resort in Everett (EEA #15060) have been prepared in accordance with the provisions of M.G.L. c. 30, Section 61 and 301 CMR 11.00 and cover potential state agency actions of the Massachusetts Department of Environmental Protection ("DEP"). The following permits and approvals will be required from DEP:

- Chapter 91 Waterways License;
- Chapter 91 Dredging Permit;
- Notification of Construction/Demolition;
- Air Plan Approval or Environmental Results Program Certification;
- Water Quality Certification (401);
- Asbestos Removal Permit (if required); and
- Superseding Order of Conditions (only upon appeal of local Order).

Project Description

The Wynn Resort in Everett (the "Project") will consist of a luxury hotel with 629 rooms, a gaming area, retail space, food and beverage outlets, convention and meeting space, a spa and gym, and a parking garage and drop-off areas to be constructed on a waterfront parcel totaling approximately 33.9 acres located in Everett, Massachusetts, adjacent to the Mystic River (the "Project Site"). Extensive landscape and open space amenities are planned which include a public gathering area with an outdoor park-like open space, a pavilion, waterfront features, a public harborwalk, and water transportation docking facilities. The Proponent has also committed to certain off-site improvements including extensive transportation improvements and a multiuse path connector ("Gateway Park Connector") from the proposed harborwalk on the Project Site to the existing paths at the Massachusetts Department of Conservation and Recreation ("DCR") Gateway Park. The Project will be developed in a single phase.

MEPA History

The Expanded Environmental Notification Form ("ENF") for the Project was filed on May 31, 2013. The Secretary of Energy and Environmental Affairs (the "Secretary")

issued the Certificate on the ENF on July 26, 2013. The Draft Environmental Impact Report (“DEIR”) was filed with the MEPA Office on December 16, 2013 and the Secretary issued a Certificate on the DEIR on February 21, 2014, setting forth a scope for the Final Environmental Impact Report (“FEIR”). The FEIR for the Project was prepared and filed on June 30, 2014. The Secretary issued a Certificate on the FEIR specifying the scope for a Supplemental Final Environmental Impact Report (“SFEIR”) on August 15, 2014. A SFEIR for the Project was filed on February 17, 2015. On _____, 2015, the Secretary issued a Certificate on the SFEIR finding that the SFEIR adequately and properly complied with the Massachusetts Environmental Policy Act and its implementing regulations.

Project Impact Evaluation

The Project will include non-water dependent use buildings on filled and flowed tidelands which must be consistent with DEP’s Chapter 91 regulations and the Everett Central Waterfront Municipal Harbor Plan. The Project includes hotel, casino, retail, restaurant and convention facilities, all of which are considered Facilities of Public Accommodation as defined in DEP’s Chapter 91 regulations. The Project will provide 6.3 acres of open space in Chapter 91 jurisdictional areas which will be improved with pedestrian amenities to support public access, including a continuous harborwalk. The Project also includes a water transportation dock to facilitate water based access. A pedestrian and bicycle connection is proposed to link the Project site to the DCR Gateway Park. The Proponent will remediate contamination at and from the Project Site. The Project minimizes impacts on coastal wetland resources and includes the restoration of 10,000 square feet of salt marsh and 550 linear feet of coastal bank.

The Project will incorporate stormwater controls consistent with DEP Stormwater Guidelines to improve the quality of urban runoff from the site. The Project will be LEED certified at the Gold level. The Project incorporates a large number of energy efficiency measures, including a combined heat and power plant, in order to reduce energy use and greenhouse gases production.

Based on DEP’s evaluation of the assessments presented and reviewed under MEPA, DEP finds that the Project will adequately mitigate the Project’s impacts. As this Project is currently described, the following mitigation measures, as identified in Table 3-2: Proposed DEP Mitigation Measures by Wynn MA LLC will be implemented by the Project:

Table 3-2: Proposed DEP Mitigation Measures by Wynn MA LLC

Subject Matter	Improvement Measure	Estimated Cost	Schedule
<p>Wetlands, Waterways, and Water Quality Certification</p>	<p>The Project will contribute to improved water quality, clean-up and restore of bulkheads and piers, remove trash and litter along the waterfront, and restore and enhance shoreline areas along the Project Site. The Project will also create public access and amenities in currently inaccessible areas of the City of Everett’s Central Waterfront.</p> <p>Wetlands mitigation and enhancement measures include:</p> <p><i>On-site</i></p> <ul style="list-style-type: none"> – Remediation, revegetation and enhancement of 550 linear feet of existing shoreline with enhanced “living shoreline;” – Removal of invasive vegetation and planting of native herbaceous and shrub vegetation along part of existing Coastal Bank and Riverfront Area; – Transformation of 10,900 +/- SF of disturbed Coastal Beach/Tidal Flats, Coastal Bank, and Riverfront Area to Salt Marsh; – Dredging to provide ample draft for water transportation, recreational vessels and a proposed floating dock; – Debris clean up within the Land Under the Ocean, Coastal Beach and Coastal Bank resource areas; – Replacement of existing bulkhead and construction of new bulkheads within areas of existing degraded 		<p>During construction and prior to opening</p>

Subject Matter	Improvement Measure	Estimated Cost	Schedule
	<p>Coastal Beach and Coastal Bank areas; and</p> <ul style="list-style-type: none"> - A Stormwater Pollution Prevention Plan (SWPPP) will be prepared in support of a Notice of Intent (NOI) filing with the EPA for coverage under the National Pollution Discharge Elimination System (NPDES) Construction General Permit (CGP). <p>Substantial public benefits and water-dependent uses along the Project Site's waterfront, transforming the Site into a vibrant and active development by providing:</p> <ul style="list-style-type: none"> - High quality open space along the Mystic River - 100% of the ground floor will be Facilities of Public Accommodation - A water transportation dock - A continuous harborwalk along the waterfront <p><i>Off-site</i> Direct bicycle and pedestrian connections to the DCR Gateway Park and to Broadway including construction of a multi-use path, benches, signage, bicycle racks, plantings and lighting.</p>		
Wetlands, Waterways and Water Quality Certification Total: \$28,736,044			
Stormwater	The Project will incorporate new stormwater management systems in compliance with applicable requirements of State and City of Everett Stormwater Management Standards. The SWPPP and long-term stormwater improvements will provide stormwater mitigation measures to be implemented		Prior to Opening

Subject Matter	Improvement Measure	Estimated Cost	Schedule
	<p>both during and after construction to improve water quality</p> <p>Implementation of a stormwater management system that will dramatically improve the quality of runoff on-site including:</p> <p><i>On-site</i></p> <ul style="list-style-type: none"> - Two new outfalls will discharge treated stormwater into the Mystic River; - Green Roof; - Best Management Practices (“BMPs”) such as pavement sweeping, deep sump catch basins, tree box filters, filtering bioretention areas, four (4) proprietary stormwater separators, and stormwater media filters will be constructed. These BMPs will be designed to remove at least 80 percent of the average annual load of Total Suspended Solids (TSS); and - Catch basins, silt fences, hay bales and crushed stone will be used during construction to prevent sediment removal from entering runoff. <p><i>Off-site</i></p> <ul style="list-style-type: none"> - Offsite mitigation measures associated with transportation improvements may include bioretention or subsurface infiltration chambers, deep sump catch basins or proprietary stormwater separators. 		
<p>Stormwater Total: \$3,056,000</p>			

Subject Matter	Improvement Measure	Estimated Cost	Schedule
Wastewater	Funding for sewer system improvements to remove Infiltration and Inflow ("I/I") equivalent to 4 gallons removed for every gallon of new wastewater generated; currently estimated at 283,489 gallons per day – Grease traps and gas/oil separators will be installed;	Assume \$10.00/gallon	During construction
Wastewater Total: \$ 2,834,890			
Air Plan Approval or Environmental Results Program/Greenhouse Gas Reductions	<p>The Project buildings will be designed to be certifiable under the Green Building Council Leadership in Energy and Environmental Design (LEED) rating of Gold or higher. The Project will be operated utilizing a series of best operating practices consistent with LEED principles to maintain the energy use, water efficiency, atmospheric, materials and resources use, and indoor air quality goals.</p> <p>The Proponent will provide a self-certification to the MEPA Office regarding compliance with GHG reductions upon completion of construction.</p> <p>Energy Efficiency (EE) Measures that are predicted to reduce stationary source CO² emissions by 26.4% relative to ASHRAE 90.1-2010 standards.</p> <p>Proposed EE measures include:</p> <ul style="list-style-type: none"> – Install street trees and lighting; – Cool roofs; – Central chiller plant with better efficiency than Code; – Demand Control 		Prior to Opening

Subject Matter	Improvement Measure	Estimated Cost	Schedule
	<p>Ventilation (DCV) for the casino, public entertainment, and retail areas;</p> <ul style="list-style-type: none"> - Energy Recovery Ventilation (ERV) to reduce chiller energy use; - Building envelopes with roof and window insulation better than Code; - Skylights over the entry atrium and along the retail promenade (daylighting controls will be tied to this extensive system of skylights); - Lower light power density 20% better than Code; - Low-energy Electronic Gaming Machines (EGMs); - Metal halide lighting for all parking structures; - High efficiency elevators with regenerative VVVF drives and LED lights; - Demand Control Exhaust Ventilation (DCEV) with variable frequency drive (VFD) fans for enclosed parking structures and metal halide lighting for all parking structures; - Kitchen and restaurant refrigeration energy efficiency design to reduce energy use; - Energy-STAR appliances; - Enhanced building commissioning; and - Occupancy controls for non-occupied or infrequently occupied spaces. <p>The Project has adopted the following Renewable Energy Measures:</p> <ul style="list-style-type: none"> - Photo-voltaic (PV) system on the podium building 		

Subject Matter	Improvement Measure	Estimated Cost	Schedule
	<p>roof or other locations, and/or purchase from local service providers of Green Power of annual electric consumption equaling 10% of the Project's annual electrical consumption;</p> <ul style="list-style-type: none"> - Cogeneration plant using a nominal 1-MW microturbine, providing approximately 20% of the Project's annual electrical consumption (the cogeneration plant is capable of providing 6,307 MWhr/year of on-site electrical generation, supporting 780 tons of absorption cooling, and providing up to 50 percent of the Project's annual heating and hot water needs). <p>Intersection improvements to reduce vehicle idling and Transportation Demand Management measures to reduce trips listed above will reduce Project-related motor vehicle CO₂ emissions by 13.0%. When combined, (stationary source plus transportation), the Project's total CO₂ emissions reductions are 25.7% percent compared to the Base Case.</p> <p>The Project will also plan for and account for the effects of Sea Level Rise by elevating the proposed structures to 9.35 feet above the 100-year flood level. The Project will also incorporate the following design criteria:</p> <ul style="list-style-type: none"> - Parking garages entrances and other openings into 		

Subject Matter	Improvement Measure	Estimated Cost	Schedule
	below grade spaces will be elevated a minimum of 3.35 feet above the 100-year flood level, or will be sufficiently flood proofed to avoid damage from coastal storms, and – Critical infrastructure and HVAC equipment will be elevated above projected flood levels. –		
Air Plan Approval or Environmental Results Program and GHG Reduction Total: \$57,000,000			
GRAND TOTAL DEP MITIGATION MEASURES \$91,626,934			

Based upon its review of the MEPA documents, the projected Project impacts and the Department’s regulations, the Department finds that the terms and conditions to be incorporated into the approvals required for this Project as specified above will constitute all feasible measures to avoid damage to the environment, including consideration of the potential effects of climate change, and will minimize and mitigate such damage to the maximum extent practicable for those impacts subject to the Department’s authority. Implementation of the mitigation measures will occur in accordance with the terms and conditions set forth in the applicable permit or approval and Table 3-2: Proposed DEP Mitigation Measures by Wynn MA LLC above.

Department of Environmental Protection

 By

 [Date]

3.3.3 DRAFT MASSACHUSETTS DEPARTMENT OF CONSERVATION AND RECREATION SECTION 61 FINDINGS

Introduction

These Section 61 Findings for Wynn Resort in Everett (EEA #15060) have been prepared in accordance with the provisions of M.G.L. c. 30, Section 61 and 301 CMR 11.00 and cover potential state agency actions of the Massachusetts Department of Conservation and Recreation ("DCR"). The following permits and approvals will be required from DCR:

- Access Permit

Project Description

The Wynn Resort in Everett (the "Project") will consist of a luxury hotel with 629 rooms, a gaming area, retail space, food and beverage outlets, convention and meeting space, a spa and gym, and a parking garage and drop-off areas to be constructed on a waterfront parcel totaling approximately 33.9 acres located in Everett, Massachusetts, adjacent to the Mystic River (the "Project Site"). Extensive landscape and open space amenities are planned which include a public gathering area with an outdoor park-like open space, a pavilion, waterfront features, a public harborwalk, and water transportation docking facilities. The Proponent has also committed to certain off-site improvements including extensive transportation improvements and a multiuse path connector ("Gateway Park Connector") from the proposed harborwalk on the Project Site to the existing paths at the Massachusetts Department of Conservation and Recreation (DCR) Gateway Park. The offsite transportation improvements, some of which involve work on DCR roadways, include improvements to Wellington Circle, Santilli Circle, and Sweetser Circle and to the Revere Beach Parkway. The Project will be developed in a single phase.

MEPA History

The Expanded Environmental Notification Form (ENF) for the Project was filed on May 31, 2013. The Secretary of Energy and Environmental Affairs (the Secretary) issued the Certificate on the ENF on July 26, 2013. The Draft Environmental Impact Report (DEIR) was filed with the MEPA Office on December 16th, 2013 and the Secretary issued a Certificate on the DEIR on February 21, 2014, setting forth a scope for the Final Environmental Impact Report (FEIR). The FEIR for the Project was prepared and filed on June 30, 2014. The Secretary issued a Certificate on the FEIR specifying the scope for a Supplemental Final Environmental Impact Report (SFEIR) on August 15, 2014. A SFEIR was filed on February 17, 2015. On _____, 2015, the Secretary issued a Certificate on the SFEIR finding that the SFEIR

adequately and properly complied with the Massachusetts Environmental Policy Act and its implementing regulations.

Project Impact Evaluation

The proposed Project will result in the generation of new vehicle and transit trips to the Project. The increase in new vehicle trips is estimated at 1,368 trips in the Friday p.m. peak hour of the resort (9:00-10:00 p.m.), and 1,810 trips in the Saturday p.m. peak hour (10:00-11:00 p.m.). New vehicle trips will result in increased volumes on several roadways under MassDOT or DCR jurisdiction, including Route 16 at Wellington Circle, Santilli Circle and Sweetser Circle, elsewhere along Route 16, and the I-93 off ramp at Sullivan Square. Improvements are proposed at Wellington Circle, Santilli Circle and Sweetser Circle, other intersections along Route 16, and at Sullivan Square. Based on DCR's evaluation of the assessments presented and reviewed under MEPA, DCR finds that the roadway improvements and other measures proposed will adequately mitigate the Project's vehicular traffic impacts.

Based on the proposed Transportation Demand Management ("TDM") program, many trips to the Project will occur on transit and non- single occupancy vehicles ("SOVs"). New transit and other non-SOV person trips are estimated at 979 trips in the Friday p.m. peak hour. In addition, improvements are proposed at the Sullivan Square Station, Wellington Station, and Malden Center MBTA Stations and at bus stops along Lower Broadway/Alford Street (Route 99) in the City of Everett to enhance bus and/or shuttle bus access and utilization.

Based on DCR's evaluation of the assessments presented and reviewed under MEPA, DCR finds that the Project will adequately mitigate the Project's impacts. As this Project is currently described, the following mitigation measures, as identified in Table 3-3: Table of Proposed DCR Mitigation Measures by Wynn MA LLC will be implemented by the Project:

Table 3-3: Proposed DCR Mitigation Measures by Wynn MA LLC

Subject Matter	Improvement Measure	Estimated Cost	Schedule
Transportation	See Table 3-1, Proposed Transportation Mitigation Measures by Wynn MA LLC. Specific mitigation measures will be required for transportation improvements at Santilli Circle, Sweetser Circle, Wellington Circle and Revere Beach Parkway.	As described in Table 3-1	As described in Table 3-1

Open Space	Direct bicycle and pedestrian connection to DCR Gateway Park including construction of a multi-use path, benches, signage, bicycle racks, plantings and lighting.	As Described in Table 3-2	As Described in Table 3-2
Public Access	Funding to DCR for planning and engineering services related to an investigation of a potential pedestrian bridge crossing of the Mystic River linking Somerville and Everett	\$250,000	Prior to opening
DCR Total (in addition to mitigation costs included in Table 3-1 and 3-2) \$250,000			

Based upon its review of the MEPA documents, the projected Project impacts and the Department’s regulations, the Department finds that the terms and conditions to be incorporated into the approvals required for this Project as specified above will constitute all feasible measures to avoid damage to the environment, including consideration of the potential effects of climate change, and will minimize and mitigate such damage to the maximum extent practicable for those impacts subject to the Department’s authority. Implementation of the mitigation measures will occur in accordance with the terms and conditions set forth in the applicable permit or approval and Table 3-3, Table of Proposed DCR Mitigation Measures by Wynn MA LLC above.

Department of Conservation and Recreation

 By

 [Date]

3.3.4 DRAFT MASSACHUSETTS WATER RESOURCES AUTHORITY SECTION 61 FINDINGS

Introduction

These Section 61 Findings for Wynn Resort in Everett (EEA #15060) have been prepared in accordance with the provisions of M.G.L. c. 30, Section 61 and 301 CMR 11.00 and cover potential state agency actions of the Massachusetts Water Resources Authority ("MWRA"). The following permits and approvals will be required from MWRA:

- 8M Permit

Project Description

The Wynn Resort in Everett (the "Project") will consist of a luxury hotel with 629 rooms, a gaming area, retail space, food and beverage outlets, convention and meeting space, a spa and gym, and a parking garage and drop-off areas to be constructed on a waterfront parcel totaling approximately 33.9 acres located in Everett, Massachusetts, adjacent to the Mystic River (the "Project Site") extensive landscape and open space amenities are planned which include a public gathering area with an outdoor park-like open space, a pavilion, waterfront features, a public harborwalk, and water transportation docking facilities. The Proponent has also committed to certain off-site improvements including extensive transportation improvements and a multiuse path connector ("Gateway Park Connector") from the proposed harborwalk on the Project Site to the existing paths at the Massachusetts Department of Conservation and Recreation (DCR) Gateway Park. The Project will be developed in a single phase.

MEPA History

The Expanded Environmental Notification Form (ENF) for the Project was filed on May 31, 2013. The Secretary of Energy and Environmental Affairs (the Secretary) issued the Certificate on the ENF on July 26, 2013. The Draft Environmental Impact Report (DEIR) was filed with the MEPA Office on December 16th, 2013 and the Secretary issued a Certificate on the DEIR on February 21, 2014, setting forth a scope for the Final Environmental Impact Report (FEIR). The FEIR for the Project was prepared and filed on June 30, 2014. The Secretary issued a Certificate on the FEIR specifying the scope for a Supplemental Final Environmental Impact Report (SFEIR) on August 15, 2014. A SFEIR was filed on February 17, 2015. On _____, 2015, the Secretary issued a Certificate on the SFEIR finding that the SFEIR adequately and properly complied with the Massachusetts Environmental Policy Act and its implementing regulations.

Project Impact Evaluation

The Proposed Project will result in the construction of certain offsite transportation improvements, including work on Broadway (Route 99) and Revere Beach Parkway. Some of this work may occur in areas where MWRA water and sewer infrastructure is located. Project work will need to be conditioned to ensure that the integrity of infrastructure facilities will be protected.

Based on the MWRA's evaluation of the assessments presented and reviewed under MEPA, the MWRA finds that the Project will adequately mitigate the Project's impacts. As this Project is currently described, one or more of the following mitigation measures may be required as a condition to the 8M permit to ensure the integrity of MWRA infrastructure facilities;

- Additional survey work, test pits and vacuum excavation to precisely identify the locations of utilities and construction monitoring and post construction surveys to ensure the integrity of MWRA infrastructure

Based upon its review of the MEPA documents, the projected Project impacts and the MWRA's regulations, the MWRA finds that the terms and conditions to be incorporated into the approvals required for this Project as specified above will constitute all feasible measures to avoid damage to the environment, including consideration of the potential effects of climate change, and will minimize and mitigate such damage to the maximum extent practicable for those impacts subject to the MWRA's jurisdiction. Implementation of the mitigation measures will occur in accordance with the terms and conditions set forth in the applicable permit or approval and the list of mitigation measures above.

Massachusetts Water Resources Authority

By

[Date]

3.3.5 DRAFT MASSACHUSETTS GAMING COMMISSION SECTION 61 FINDINGS

Introduction

These Section 61 Findings for Wynn Resort in Everett (EEA #15060) have been prepared in accordance with the provisions of M.G.L. c. 30, Section 61 and 301 CMR 11.00 and cover potential state agency actions of the Massachusetts Gaming Commission ("MGC"). The following approvals will be required from MGC:

- Category 1 Gaming License

Project Description

The Wynn Resort in Everett (the "Project") will consist of a luxury hotel with 629 rooms, a gaming area, retail space, food and beverage outlets, convention and meeting space, a spa and gym, and a parking garage and drop-off areas to be constructed on a waterfront parcel totaling approximately 33.9 acres located in Everett, Massachusetts, adjacent to the Mystic River (the "Project Site"). Extensive landscape and open space amenities are planned which include a public gathering area with an outdoor park-like open space, a pavilion, waterfront features, a public harborwalk, and water transportation docking facilities. The Proponent has also committed to certain off-site improvements including extensive transportation improvements and a multiuse path connector ("Gateway Park Connector") from the proposed harborwalk on the Project Site to the existing paths at the Massachusetts Department of Conservation and Recreation (DCR) Gateway Park. The Project will be developed in a single phase.

MEPA History

The Expanded Environmental Notification Form (ENF) for the Project was filed on May 31, 2013. The Secretary of Energy and Environmental Affairs (the Secretary) issued the Certificate on the ENF on July 26, 2013. The Draft Environmental Impact Report (DEIR) was filed with the MEPA Office on December 16th, 2013 and the Secretary issued a Certificate on the DEIR on February 21, 2014, setting forth a scope for the Final Environmental Impact Report (FEIR). The FEIR for the Project was prepared and filed on June 30, 2014. The Secretary issued a Certificate on the FEIR specifying the scope for a Supplemental Final Environmental Impact Report (SFEIR) on August 15, 2014. A SFEIR was filed on February 17, 2015. On _____, 2015, the Secretary issued a Certificate on the SFEIR finding that the SFEIR adequately and properly complied with the Massachusetts Environmental Policy Act and its implementing regulations.

Project Impact Evaluation

The Category 1 License awarded by the MGC to Wynn MA, LLC on November 7, 2014 is expressly conditioned on the Project's compliance with MEPA and with any conditions required in the FEIR, SFEIR, or any Secretary's certificate thereon. The MGC Commission finds, based upon its review of the MEPA documents that the terms and conditions of these Section 61 Findings constitute all feasible measures to avoid damage to the environment, including consideration of the potential effects of climate change, and will minimize and mitigate such damage to the maximum extent practicable for those impacts subject to MGC's authority. Implementation of the mitigation measures will occur in accordance with the terms and conditions set forth in the license and Table 3-4: Summary of Proposed Project Mitigation Measures by Wynn MA LLC.

Table 3-4: Summary of Proposed Project Mitigation Measures by Wynn MA LLC

Subject Matter	Improvement Measure	Estimated Cost	Schedule
Transportation	See Table 3-1, Proposed Transportation Mitigation Measures by Wynn MA LLC	As described in Table 3-1	As described in Table 3-1.
Transportation Total: 78,532,500 – 98,532,500			
			During construction and post occupancy
Wastewater	The Project will provide funding for sewer system improvements to remove Infiltration and Inflow ("I/I") equivalent to 4 gallons removed for every gallon of new wastewater generated; currently estimated at 283,489 gallons per day. - Grease traps and gas/oil separators will be installed.		During construction
Wastewater Total: \$ 2,834,890			
Water Use	The Project will obtain Leadership in Energy and Environmental Design ("LEED") Certification of Gold or higher, and incorporates		During construction

Subject Matter	Improvement Measure	Estimated Cost	Schedule
	<p>water conservation measures that are intended to reduce the potable water demand on the MWRA water supply system. The Project will utilize water-efficient plumbing fixtures, low-flow lavatory faucets and showerheads. Through rainwater harvesting, grey water reuse and the installation of alternatives to natural turf landscaping, the Project will further reduce water demand and use.</p> <p>The Project includes extensive indoor and outdoor landscaping. The Project will utilize timers, soil moisture indicators and rainfall sensors to reduce potable water use on landscaping.</p>		
Water Use Total included in Greenhouse Gas Emissions			
<p>Wetlands, Waterways and Water Quality Certification</p>	<p>The Project will contribute to improved water quality, clean-up and restore of bulkheads and piers, remove trash and litter along the waterfront, and restore and enhance shoreline areas along the Project Site. The Project will also create public access and amenities in currently inaccessible areas of the City of Everett’s Central Waterfront.</p> <p>Wetlands mitigation and enhancement measures include: <i>On-site</i></p> <ul style="list-style-type: none"> - Remediation, revegetation and enhancement of 550 linear feet of existing shoreline with enhanced “living shoreline;” - Removal of invasive vegetation and planting of native herbaceous and shrub vegetation along part of existing Coastal 		<p>During construction and prior to opening</p>

Subject Matter	Improvement Measure	Estimated Cost	Schedule
	<p>Bank and Riverfront Area;</p> <ul style="list-style-type: none"> - Transformation of 10,900 +/- SF of disturbed Coastal Beach/Tidal Flats, Coastal Bank, and Riverfront Area to Salt Marsh; - Dredging to provide ample draft for water transportation, recreational vessels and a proposed floating dock; - Debris clean up within the Land Under the Ocean, Coastal Beach and Coastal Bank resource areas; - Replacement of existing bulkhead and construction of new bulkheads within areas of existing degraded Coastal Beach and Coastal Bank areas; and <p>Substantial public benefits and water-dependent uses along the Project Site's waterfront, transforming the Site into a vibrant and active development by providing:</p> <ul style="list-style-type: none"> - High quality open space along the Mystic River - 100% of the ground floor will be Facilities of Public Accommodation - A water transportation dock - A continuous harborwalk along the waterfront <p><i>Off-site</i> Direct bicycle and pedestrian connections to the DCR Gateway Park and to Broadway including construction of a multi-use path, benches, signage, bicycle racks, plantings and lighting</p>		

Subject Matter	Improvement Measure	Estimated Cost	Schedule
Public Access	Funding to DCR for planning and engineering services related to an investigation of a potential pedestrian bridge crossing of the Mystic River linking Somerville and Everett	\$250,000	Prior to opening
Wetlands, Waterways and Water Quality Certification Total: \$28,986,044			
Stormwater	<p>Implementation of a stormwater management system that will dramatically improve the quality of runoff on-site. including:</p> <p><i>On-site</i></p> <ul style="list-style-type: none"> - Two new outfalls will discharge treated stormwater into the Mystic River; - Green Roof; - Best Management Practices ("BMPs") including pavement sweeping, deep sump catch basins, tree box filters, filtering bioretention areas, four (4) proprietary stormwater separators, and stormwater media filters will be constructed. These BMPs will be designed to remove at least 80 percent of the average annual load of Total Suspended Solids (TSS); and - Catch basins, silt fences, hay bales and crushed stone will be used during construction to prevent sediment from entering runoff. <p><i>Off-site</i></p> <ul style="list-style-type: none"> - Offsite mitigation measures associated with 		Prior to Opening

Subject Matter	Improvement Measure	Estimated Cost	Schedule
	transportation improvements will include bioretention or subsurface infiltration chambers, deep sump catch basins or proprietary stormwater separators.		
On-Site Stormwater Total: \$ 3,056,000			
Green House Gas Emissions	The Project buildings will be designed to be certifiable under the Green Building Council Leadership in Energy and Environmental Design (LEED) rating of Gold or higher. The Project will be operated utilizing a series of best operating practices consistent with LEED principles to maintain the energy use, water efficiency, atmospheric, materials and resources use, and indoor air		During construction and post occupancy

Subject Matter	Improvement Measure	Estimated Cost	Schedule
	<p>quality goals.</p> <p>The Proponent will provide a self-certification to the MEPA Office regarding compliance with GHG reductions upon completion of construction.</p> <p>The Project will commit to a comprehensive list of Energy Efficiency Measures (EEM) that are predicted to reduce CO2 emissions from stationary sources 27.4%. Proposed EE measures include:</p> <ul style="list-style-type: none"> - Install street trees and lighting; - Cool roofs; - Central chiller plant with better efficiency than Code; - Demand Control Ventilation (DCV) for the casino, public entertainment, and retail areas; - Energy Recovery Ventilation (ERV) to reduce chiller energy use; - Building envelopes with roof and window insulation better than Code; - Skylights over the entry atrium and along the retail promenade (daylighting controls will be tied to this extensive system of skylights); - Lower light power density 20% better than Code; - Low-energy Electronic Gaming Machines (EGMs); - Metal halide lighting for all parking structures; - High efficiency elevators with regenerative VVVF drives and LED lights; - Demand Control Exhaust Ventilation (DCEV) with variable frequency drive 		

Subject Matter	Improvement Measure	Estimated Cost	Schedule
	<p>(VFD) fans for enclosed parking structures and metal halide lighting for all parking structures;</p> <ul style="list-style-type: none"> - Kitchen and restaurant refrigeration energy efficiency design to reduce energy use; - Energy-STAR appliances; - Enhanced building commissioning; and - Occupancy controls for non-occupied or infrequently occupied spaces. <p>The Project has adopted the following Renewable Energy Measures:</p> <ul style="list-style-type: none"> - Photo-voltaic (PV) system on the podium building roof or other locations, and/or purchase from local service providers of Green Power of annual electric consumption equaling 10% of the Project's annual electrical consumption; - Cogeneration plant using a nominal 1-MW microturbine, providing approximately 20% of the Project's annual electrical consumption (the cogeneration plant is capable of providing 6,307 MWhr/year of on-site electrical generation, supporting 780 tons of absorption cooling, and providing up to 50 percent of the Project's annual heating and hot water needs). <p>Intersection improvements to reduce vehicle idling and Transportation Demand</p>		

Subject Matter	Improvement Measure	Estimated Cost	Schedule
	<p>Management measures to reduce trips listed above will reduce Project-related motor vehicle CO₂ emissions by 13.0%. When combined, (stationary source plus transportation), the Project's total CO₂ emissions reductions are 25.7% percent compared to the Base Case.</p> <p>The Project will also plan for and account for the effects of Sea Level Rise by elevating the proposed structures to 9.35 feet above the 100-year flood level. The Project will also incorporate the following design criteria:</p> <ul style="list-style-type: none"> - Parking garages entrances and other openings into below grade spaces will be elevated a minimum of 3.35 feet above the 100-year flood level, or will be sufficiently flood proofed to avoid damage from coastal storms, and - Critical infrastructure and HVAC equipment will be elevated above projected flood levels. 		
Green house Gas Emissions Total: \$ 57,000,000			
Grand Total: \$170,409,434 - \$190,409,434			

The Commission finds that the terms and conditions incorporated into the Commission approval for this Project constitute all feasible measures to avoid damage to the environment, including consideration of the potential effects of climate change, and will minimize and mitigate such damage to the maximum extent practicable for those impacts subject to the Commission's authority. Implementation of the mitigation measures will occur in accordance with the terms and conditions set forth in the license and Table 3-4: Summary of Proposed Project Mitigation Measures by Wynn MA LLC.

Gaming Commission

By

[Date]

Chapter 4

RESPONSES TO COMMENTS ON THE FINAL ENVIRONMENTAL IMPACT REPORT

CHAPTER 4: RESPONSES TO COMMENTS ON THE FINAL ENVIRONMENTAL IMPACT REPORT

Comment Code	Entity
Agencies	
EOEEA	Executive Office of Energy and Environmental Affairs
MWRA	Massachusetts Water Resources Authority
MAPC	Metropolitan Area Planning Council
CZM	Coastal Zone Management
DCR	Department of Conservation and Recreation
DEP	Department of Environmental Protection
DMF	Division of Marine Fisheries
MassDOT	Massachusetts Department of Transportation
Massport	Massachusetts Port Authority
DOER	Massachusetts Department of Energy Resources
Elected Officials	
Everett	City of Everett Mayor- Carlo DeMaria, Jr.
Medford	City of Medford Mayor – Michael J. McGlynn
Boston	Councilor Salvatore LaMattina
Somerville	City of Somerville Mayor – Joseph A. Curtatone
Municipalities	
Boston – OGA	Boston Office of Gaming Accountability
Boston – BTD	Boston Transportation Department
Boston – ED	Environment Department
Boston – BPR	Boston Parks and Recreation Department
Boston – LD	Law Department
Medford – CD	Office of Community Development
Organizations	
AUDUBON	Mass Audubon – Advocacy Department
BHIA	Boston Harbor Island Alliance
CPSDRC	Charlestown Preservation Society Design Review Committee
CWC	Charlestown Waterfront Coalition
DDRC	DDR Corp.
MyRWA	Mystic River Watershed Association
TBHA	The Boston Harbor Association
FRIT	Federal Realty Investment Trust

Comment Code	Entity
FH	Fort Hill
Stantec	Stantec Consulting Services
GPI	Greenman – Pedersen, Inc.
LL&C	Liz Levin & Company
Individuals	
JV	James Vitagliano
PG	Peter Giannikopoulos
TBW	Terry Baldwin- Williams

Massachusetts Executive Office of Energy and Environmental Affairs - Secretary's Certificate on the FEIR

EOEEA – 1	<p>Comment: Comments from MassDOT, MAPC and City of Boston identify questions regarding calculation of mode shares and a concern that some trips are double counted. As an example, patrons that access the site via the MBTA Orange Line and take the shuttle from the station to the site are counted as arriving both via shuttle service and public transit (the Orange Line). MassDOT discussed this issue with the Proponent and a revised methodology will be provided in the SFEIR.</p> <p>Response: The Proponent has collaborated with MassDOT on a methodology addressing these concerns. A revised Project mode share analysis pursuant to this methodology is presented in Section 2.1.2 of the SFEIR.</p>
EOEEA – 2	<p>Comment: The Proponent has consulted with MassDOT to address these inconsistencies between results of SYNCHRO and VISSIM traffic modeling, and will provide additional information regarding the two models in the SDEIR.</p> <p>Response: Revised SYNCHRO and VISSIM analyses in consultation with MassDOT are presented in Section 2.1.3 of the SFEIR.</p>
EOEEA – 3	<p>Comment: A revised Stretch Code is expected to require energy use in new large buildings to be 12 to 15 percent below the baseline of IECC 2012. While information provided in the FEIR is consistent with the GHG policy (i.e., using the Building Code in effect at the time of the ENF filing), I strongly encourage the Proponent to revise its model based on the 2010 ASHRAE 90.1 to demonstrate compliance with the current 2012 IECC Code and the potential revisions to the Stretch Code.</p> <p>Response: The Proponent has complied with this request. That analysis is summarized in Section 1.2.7.1 and is included as Appendix C in this SFEIR.</p>

Massachusetts Executive Office of Energy and Environmental Affairs - Secretary's Certificate on the FEIR	
EOEEA – 4	<p>Comment: The FEIR presents a more detailed and expanded network of employee and patron shuttles. It is unclear whether mobile source emissions included emissions associated with these sources. The [S]FEIR should clarify this issue and, if appropriate, include these sources in the mobile source analysis.</p> <p>Response: The mobile source emissions component of the GHG analysis provided in the FEIR Chapter 5, and further detailed in FEIR Appendix F, included all emissions from the employee and patron shuttles. The updated GHG analysis provided in Appendix C of this SFEIR similarly includes such emissions.</p>
EOEEA – 5	<p>Comment: The second alternative consists of a regional wastewater mitigation approach that would divert flows from the project and the flows from the City of Everett to the MWRA's North Metro Relief Sewer which has less sanitary sewer overflow (SSO) risks than the MWRA Cambridge Branch. This alternative could reduce sewer overflows into the Mystic River from the Cambridge Branch Sewer tributary area and improve water quality. Comments from MassDEP and MWRA are supportive of this alternative approach. However, MassDEP notes that this approach will not by itself serve to fully meet the requirements of 314 CMR 12.00. The Proponent should consult with the City of Everett, the MWRA, and MassDEP on this issue.</p> <p>Response: See Sections 1.2.7.5 and 1.5.5 of the SFEIR.</p>
EOEEA – 6	<p>Comment: The FEIR should include a revised and updated TIA that includes additional data, analysis, and assessment of alternatives and mitigation measures. The SFEIR should clearly identify proposed roadway improvements, supported by conceptual plans that support analysis of the feasibility of constructing or implementing proposed improvements. It should clearly demonstrate the benefits and, where appropriate, impacts to traffic operations, congestion, and safety. The SFEIR should identify a schedule for implementation, its relationship to project site occupancy, and relationship to roadway improvements planned by others.</p> <p>Response: The SFEIR includes an updated analysis and assessment of traffic operational impacts and mitigation measures. The proposed mitigation for each affected roadway location, as well as associated plans and analysis, is detailed in Chapter 2. A summary of all proposed mitigation is provided in Chapter 3. Chapter 3 also discusses the schedule for design and implementation of the proposed transportation mitigation measures by location.</p>
EOEEA – 7	<p>Comment: The Proponent should consult with MassDOT, Massport, DCR, the City of Everett and other municipalities to discuss methodology and</p>

Massachusetts Executive Office of Energy and Environmental Affairs - Secretary's Certificate on the FEIR	
	<p>results of the revised analysis prior to filing the SFEIR. I strongly encourage the Proponent to consult jointly with MassDOT and the City of Boston regarding the treatment of Rutherford Avenue and Sullivan Square in the SFEIR.</p> <p>Response: The Proponent has consulted with MassDOT, Massport, DCR, and municipalities, including the Cities of Everett, Boston, and Somerville. For a summary of meetings, agencies represented, and topics discussed, see Sections 1.5 and 2.2.1 of the SFEIR.</p>
EOEEA – 8	<p>Comment: The SFEIR should also identify whether interim improvements in Sullivan Square would impact the feasibility or cost of proposed design of Sullivan Square. I expect the Proponent will continue to work with MassDOT, the surrounding cities and MAPC on both short-term and long-term solutions to address the project's impact while supporting municipal redevelopment visions, roadway design plans, and improved regional connections.</p> <p>Response: The Proponent has determined that the proposed mitigation measures will not negatively impact the feasibility of the City of Boston's proposed long-term solution (the "surface alternative") for Sullivan Square and Rutherford Avenue. The proposed mitigation, once constructed, will dovetail with the proposed surface alternative with minimal need to reconstruct the mitigated area, as described in detail in Section 2.2.7.</p> <p>The Proponent has consulted with BTB, MassDOT, and the MBTA regarding the proposed improvements to Sullivan Square and worked to address each agency's concerns about the proposed mitigation as described in Section 1.5 of the SFEIR. The study team will continue to work with the agencies as the final design of the mitigation plan is advanced to construction.</p>
EOEEA – 9	<p>Comment: The SFEIR should include a revised mitigation program to provide a clearer understanding of the proposed mitigation commitments, the resulting benefits to traffic operations and congestion, the timing of their implementation, and how it relates to the project site occupancy.</p> <p>Response: The proposed mitigation for each location, as well as associated plans and analysis, is detailed in Chapter 2. A summary of all proposed mitigation is provided in Chapter 3. Chapter 3 also discusses the schedule for design and implementation of the proposed transportation mitigation measures by location.</p>
EOEEA – 10	<p>Comment: The Proponent should also seek consensus with MassDOT, DCR, and municipalities regarding the feasibility of proposed improvements. The Proponent should meet with MassDOT and DCR prior</p>

Massachusetts Executive Office of Energy and Environmental Affairs - Secretary's Certificate on the FEIR	
	<p>to submission of the [S]FEIR.</p> <p>Response: See Section 1.5 for a detailed description of meetings and consultations.</p>
EOEEA – 11	<p>Comment: Because of overlapping jurisdiction and interest in ensuring that transportation impacts are avoided and mitigated to the extent possible, I strongly encourage the Proponent, MassDOT and DCR to participate in joint meetings to address issues in a coordinated manner and seek consensus in necessary mitigation. As appropriate, joint meetings should include municipalities.</p> <p>Response: For a summary of meetings, agencies represented, and topics discussed, see Section 1.5.</p>
EOEEA – 12	<p>Comment: The SFEIR should clearly identify whether roadway improvements are considered interim or long-term, identify associated timeframes, and expand the Build with Mitigation analysis. The SFEIR should include sufficiently detailed conceptual plans (preferably 80- scale) for all newly proposed roadway improvements to verify the feasibility of constructing such improvements.</p> <p>Response: Chapter 2 provides details regarding the proposed roadway mitigation, as well as associated analyses. Chapter 3 provides a summary of all proposed transportation mitigation measures. Chapter 3 also discusses a schedule for design and implementation of the proposed mitigation measures. Chapter 2 includes 80-scale conceptual plans for all proposed roadway mitigation in sufficient detail to verify their feasibility.</p>
EOEEA – 13	<p>Comment: The conceptual plans should clearly show proposed lane widths and offsets, layout lines, road jurisdiction, and the land uses (including access drives) adjacent to areas where improvements are proposed so that the feasibility of constructing the proposed improvements can be addressed.</p> <p>Response: The conceptual plans provided in Chapter 2 show the proposed lane widths and curb offsets, layout lines, roadway jurisdiction, and land uses including access drives adjacent to proposed improvement areas.</p>
EOEEA – 14	<p>Comment: The SFEIR should describe methodologies for SYNCHRO, VISSIM and SIDRA modeling and include results of each. It should ensure consistency of inputs and identify and analyze any anomalies. Signal locations and intersection approach geometry (e.g., number of lanes, lane width, lane usage, etc.) should be consistent.</p> <p>Response: Section 2.1.3 describes the methodologies for Synchro, SIDRA,</p>

Massachusetts Executive Office of Energy and Environmental Affairs - Secretary's Certificate on the FEIR	
	SimTraffic, and VISSIM traffic modeling developed in consultation with MassDOT.
EOEEA – 15	<p>Comment: The SFEIR should provide detailed and direct responses to comments provided by MassDOT. The Proponent should consult with MassDOT and the MBTA prior to and during the preparation of the SFEIR to ensure transit operations and capacity issues are adequately addressed.</p> <p>Response: Section 1.5 of the SFEIR summarizes the Proponent's consultation and collaboration with MassDOT and the MBTA. Chapter 2 reflects the results of that consultation and collaboration with MassDOT and the MBTA. Chapter 4 provides detailed and direct responses to MassDOT's comments on the FEIR.</p>
EOEEA-16	<p>Comment: The Proponent should consult with the MBTA regarding shuttle service, integration of bus service into the project site and opportunities for improving bus service along Route 99 in the project vicinity.</p> <p>Response: The Proponent consulted with the MBTA regarding Wynn shuttle service, integration of bus service in to the Project Site, and opportunities for improving bus service along Route 99 in the Project vicinity. The result of that collaboration is presented in Sections 2.4.1 and 2.4.3 of the SFEIR.</p>
EOEEA-17	<p>Comment: It should provide a summary (in a tabular format) of intersections used by MBTA buses and identify where timing or turning movements could impact this service.</p> <p>Response: See Appendix B-10, Transit Analysis, for the requested tabular summary of intersections.</p>
EOEEA-18	<p>Comment: The SFEIR should include an assessment of how shuttle service would interact with existing MBTA bus routes in terms of berthing space and potential duplication of services. The SFEIR should provide a comparison of shuttle services arrivals and departures relative to Orange Line service and more detailed shuttle berthing plans to support a feasibility assessment and ensure conflicts with existing services are not created. The plans should address consistency with codes and standards related to Americans with Disabilities Act (ADA), and the Massachusetts Architectural Access Board (MAAB), and the Federal Transit Administration (FTA) regulations and guidance.</p> <p>Response: The Proponent has completed these assessments in collaboration with MassDOT and the MBTA. See Section 2.4 of the SFEIR.</p>

Massachusetts Executive Office of Energy and Environmental Affairs - Secretary's Certificate on the FEIR	
EOEEA-19	<p>Comment: The Proponent should provide a revised analysis of project Orange Line peak loads for weekday and weekend service days between Wellington and Back Bay Stations.</p> <p>Response: The Proponent has completed the analysis. See Section 2.4.2 of the SFEIR.</p>
EOEEA-20	<p>Comment: Should the projections show loading standards to be violated, the Proponent should discuss with the MBTA and MassDOT providing financial support for increased Orange Line service.</p> <p>Response: The Proponent has completed the analysis. See Section 2.4.2 of the SFEIR. This analysis confirms no financial support is warranted.</p>
EOEEA-21	<p>Comment: The SFEIR should provide an update on consultation with the MBTA regarding the proposed land acquisition. It should identify any changes to proposed access or circulation and identify how the MBTA operations at this facility will be supported during construction and upon occupancy of the site.</p> <p>Response: The requested update may be found in Section 1.2.3 of the SFEIR.</p>
EOEEA-22	<p>Comment: The Proponent should reevaluate parking demand and clarify assumptions used to determine the overall on-site parking supply, particularly in light of the increase in proposed parking. The SFEIR should reevaluate parking demand and clarify assumptions used to determine the overall on-site parking supply, particularly the source of operation capacity percentages, assumptions about patron length of stay and arrival patterns, and the requirement to achieve a desired LOS for patrons using the parking garage and surface lots. The SFEIR should address whether parking could be banked until warranted by demand.</p> <p>Response: The requested reevaluation can be found in Section 2.3 of the SFEIR.</p>
EOEEA-23	<p>Comment: The SFEIR should present alternatives for pedestrian access from the site to Sullivan Square Station.</p> <p>Response: Pedestrian access to Sullivan Square is discussed in Section 2.2.7.1 of the SFEIR.</p>
EOEEA-24	<p>Comment: The SFEIR should include an update on any consultation with DCR, City of Everett and City of Somerville regarding this potential connection.</p>

Massachusetts Executive Office of Energy and Environmental Affairs - Secretary's Certificate on the FEIR	
	Response: The Proponent has committed \$250,000 in funding to DCR for planning and engineering services related to investigation of a potential pedestrian bridge crossing of the Mystic River linking Somerville and Everett. See Section 3.3.3 including Table 3.3.
EOEEA-25	<p>Comment: The Proponent has indicated in discussions that they would work with the City of Everett to seek an alternative bicycle connection north of Route 16. Bicycle access should be clearly described in the SFEIR and supported by plans that facilitate assessment of the feasibility of implementation.</p> <p>Response: The Proponent's proposed bicycle connection north of Route 16 is discussed in Section 2.2.3 of the SFEIR.</p>
EOEEA-26	<p>Comment: The FEIR should consider comments provided on the Transportation Monitoring Program, including addition of locations and MBTA bus routes, and identify any revisions in the SFEIR.</p> <p>Response: The Transportation Monitoring Program has been revised and is presented in Section 2.7 of the SFEIR.</p>
EOEEA-27	<p>Comment: I also note MassDOT's comment indicating that, based on the size of the project, MassDOT anticipates the need to monitor and update the TDM program prior to full occupancy of the site.</p> <p>Response: The commencement of the Transportation Monitoring Program has been advanced to occur prior to occupancy of the hotel or gaming component of the Project, whichever occurs first, to allow for adjustments to the TDM program as may be necessary prior to full occupancy of the Project. See Section 2.7.</p>
EOEEA-28	<p>Comment: The SFEIR should contain revised and updated mitigation commitments. It should identify clear commitments to implement mitigation measures, estimate the individual costs of each proposed measure, identify the parties responsible for implementation, and contain a schedule for implementation, updating these elements as necessary from those presented in the FEIR. Draft Section 61 Findings for each State Agency that will issue permits for the project should be included. They should be revised to incorporate detailed commitments.</p> <p>Response: Chapter 3 provides updated mitigation commitments and the associated Draft Section 61 findings.</p>

Massachusetts Executive Office of Energy and Environmental Affairs - Secretary's Certificate on the FEIR

EOEEA-29	<p>Comment: The SFEIR should contain a copy of this certificate and a copy of each comment letter received. In order to ensure that the issues raised by commenters are addressed, the SFEIR should include direct responses to comments to the extent that they are within MEPA jurisdiction. This directive is not intended to, and shall not be constructed to enlarge the scope of the SFEIR beyond what has been expressly identified in this certificate.</p> <p>Response: The SFEIR includes in this Chapter 4, Responses to Comments on the FEIR, a copy of the certificate, as well as copies of each comment letter received and responses to those comments to the extent that they are within MEPA jurisdiction.</p>
EOEEA-30	<p>Comment: The Proponent should circulate the SFEIR to those parties who commented on the EENF, and/or the DEIR, and/or the FEIR, to any State Agencies from which the Proponent will seek permits or approvals, and to any parties specified in section 11.16 of the MEPA regulations. To save paper and other resources, the Proponent may circulate copies of the SFEIR to commenters other than Agencies in CD-ROM format or post to an online website, although the Proponent should make available reasonable number of hard copies, to accommodate those without convenient access to a computer to be distributed upon request on a first come first serve basis. The Proponent should send a letter accompanying the CD-ROM or identifying the web address of the online version of the SFEIR indicating that hard copies are available upon request, noting relevant comment deadlines, and appropriate addresses for submission of comments.</p> <p>Response: The Proponent has circulated the SFEIR as directed in the Secretary's Certificate.</p>

Massachusetts Water Resources Authority

MWRA- 1	<p>Comment: Based upon the available alternatives described in Chapter 9, MWRA is confident that working with the Proponent and the City of Everett, additional wastewater flows generated by the project will be adequately mitigated. MWRA welcomes coordination with the Proponent in its further development of mitigation measures as well as its eventual submission of permit applications to work within MWRA easements and/or new direct connections to the MWRA system.</p> <p>Response: See Sections 1.2.7.5 and 1.5.5.</p>
MWRA - 2	<p>Comment: When the proposed transportation improvements are in the design phase, we encourage the Project Proponent and/or their consultants</p>

Massachusetts Water Resources Authority	
	<p>to contact Mr. Kevin McKenna within MWRA's Wastewater Permitting Group at (617) 350-5956 and Mr. Ralph Francesconi in the Water Permitting Group at (617) 350-5827 for permitting assistance early in the process.</p> <p>Response: The Proponent will contact Mr. McKenna and Mr. Francesconi as the Project proceeds through the design and permit phases.</p>
MWRA – 3	<p>Comment: If the Proponent's public access plan expands to include neighboring properties such as MWRA's Delauri Pump Station located nearby in Boston adjacent to the Boston/Everett City line, MWRA would support having the Proponent provide a link along the water's edge to connect to Route 99 and eventually further south to Sullivan Square in Charlestown. Construction and maintenance of any public access walkway at the DeLauri site would be the Proponent's responsibility and will also require an 8 (m) permit.</p> <p>Response: The public access plan includes a harborwalk connecting to Route 99 directly from the Project Site that does not include the MWRA property.</p>

Metropolitan Area Planning Council	
MAPC – 1	<p>Comment: Due to project-generated traffic forecasts to utilize this corridor, the project's traffic impacts and the City's vision for Rutherford Avenue and Sullivan Square contradict each other. While MAPC does not foresee a reasonable mitigation program that could resolve this problem adequately, there are some additional measures (cited in following comments) the Proponent could implement which may lessen the impacts.</p> <p>Response: The Proponent has proposed mitigation for the Project's traffic impacts that dovetails with the City's long-term vision for Rutherford Avenue and Sullivan Square in consultation with MassDOT, the MBTA and BTM as described in Section 2.2.7 of the SFEIR.</p> <p>The Proponent will continue to support the City of Boston in advancing a long-term vision for Sullivan Square and Rutherford Avenue that will improve safety and functionality pursuant to the terms of the Gaming License.</p>
MAPC – 2	<p>Comment: 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. Enhancing the Route 99 corridor for bus service will encourage patrons and employees accessing</p>

Metropolitan Area Planning Council	
	<p>the project site to use this mode of transportation.</p> <p>Response: The Proponent has proposed improvements to enhance bus service on the Route 99 bus corridor. See Section 2.2.1 and 2.4.1 of the SFEIR.</p>
MAPC – 3	<p>Comment: The other area of 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 commit to monitor this location as part of the transportation and monitoring program.</p> <p>Response: Additional monitoring locations including intersections in Medford have been added, as detailed in Section 2.7 of the SFEIR.</p>
MAPC – 4	<p>Comment: The Proponent plans to optimize the traffic signal timing and phasing plan as well as upgrade/replace traffic signal equipment/signs/pavement markings at Wellington Circle. The Proponent has also committed to commission and fund a permanent improvements study of Wellington Circle in its Surrounding Community Agreement with the City concept design (up to \$1 million) for a permanent solution for Wellington Circle. Subsequent to study and design, the Proponent has indicated that they intend to seek funding from the Transportation Infrastructure and Development Fund for a permanent solution for Wellington Circle. To reiterate, Wellington Circle should be monitored as part of the Proponent's transportation and monitoring program.</p> <p>Response: See Section 2.7 of the SFEIR.</p>
MAPC – 5	<p>Comment: As described in the DEIR, the Proponent assumes that 80% of all Orange Line riders destined to the project site will originate from south of Sullivan Square station rather than travelling further north to Malden Center or Wellington Stations. Based on their own analysis, the Proponent has identifies that the weekday passenger load currently exceeds capacity for this segment during the 8-9 PM period. Specifically, the Orange Line is currently at 94% capacity during this period and the new project trips would increase passenger load to 103% of capacity.</p> <p>To off-set these impacts, the Proponent should partner with the MBTA by contributing to the both the operating and maintenance costs of area bus and subway lines in amounts that are reasonably related to the additional demand of the project. MAPC believes strongly that transportation impact mitigation should not be limited solely to roadways.</p> <p>Response: The Proponent has completed a detailed revised analysis of Orange Line capacity to serve Project-related ridership. See Section 2.4.2</p>

Metropolitan Area Planning Council	
	of the SFEIR. This analysis confirms that no financial support is warranted.
MAPC – 6	<p>Comment: According to the FEIR, up to 1,000 parking spaces could be provided at Malden Center and up to 800 parking spaces at Wellington Station. In addition, parking agreements at these two locations are well underway. However, the FEIR states that the location of the third off-site parking facility in Everett still needs to be determined. The exact location, number of parking spaces, and route information for this off-site parking facility needs to be provided by the Proponent.</p> <p>Response: The Proponent's updated parking plans are presented in Section 2.3. Figure 2-92 depicts the area of Everett in which the third off-site employee parking facility is planned to be located.</p>
MAPC – 7	<p>Comment: While the FEIR does mention that the private charter buses will transport groups directly to the project site, the FEIR does not mention where the charter buses will park long-term. For example, will charter 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?</p> <p>Response: Figure 2-120 shows the location of the curb where tour buses will pick-up and drop-off passengers. Once they have dropped off passengers, tour buses will be staged off-site.</p>
MAPC – 8	<p>Comment: While the FEIR contains a scope outlining mitigation commitments, 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. A scope and timeline of mitigation commitments should be included in the Section 61 findings as a basis for subsequent permitting.</p> <p>Response: See Chapter 3. The Draft Section 61 findings include the scope and timing of proposed mitigation measures.</p>

Coastal Zone Management	
CZM – 1	<p>Comment: CZM recommends continued close coordination with CZM and Division of Marine Fisheries regarding the proposed shellfish bed so that an appropriate type of shellfish or alternative living shoreline element is selected for the site.</p> <p>Response: See Section 1.2.6.2.</p>
CZM– 2	<p>Comment: CZM recommends that during the permitting process, the</p>

Coastal Zone Management	
	<p>proponent provide addition detail regarding the design of the proposed outfalls and how runoff from the proposed new outfalls would not negatively impact water quality in the Mystic River.</p> <p>Response: As described in the FEIR, the stormwater management system for the project will be designed to capture and treat the first inch of runoff from impervious surfaces. This design will prevent negative water quality impacts to the Mystic River and will fully comply with Massachusetts DEP Stormwater Management Standards, including the minimum removal standard of 80% of the average annual load of Total Suspended Solids (TSS). During the permitting process, including the filing of a Notice of Intent with the City of Everett Conservation Commission and MassDEP, additional details about the stormwater management design will be provided, including sizes of proposed best management practices (BMPs), measures to resist erosion from outfall discharges, and additional documentation as needed to support TSS removal credits for BMPs.</p>
CZM – 3	<p>Comment: CZM recommends that the new facility include a boat sewage pump out to provide sanitary service to the vessels that will be using the new facility.</p> <p>Response: The Proponent will consider including provisions for a boat sewage pump out station as the project design advances.</p>

Department of Conservation and Recreation	
DCR – 1	<p>Comment: DCR notes that the roadway widening to accommodate additional lanes at Wellington Circle will come at the expense of existing green space, including a number of trees. DCR requests details on how the Proponent plans to mitigate these losses.</p> <p>Response: The Proponent has proposed the creation of green space at Wellington Circle. See Section 2.2.6 of the SFEIR.</p>
DCR – 2	<p>Comment: DCR notes it has recently installed Uninterruptable Power Supply (“UPS”) systems for the three traffic signal control cabinets at Wellington Circle. New UPS systems should be part of the proposed traffic signal equipment and should be designed for the increased electrical load of proposed additional pedestrian signals. Furthermore, the three existing traffic signal control cabinets at Wellington Circle are hardwire connected to coordinate traffic signal control equipment at Fellsway/President’s Landing should also be replaced in order to make compatibility with the overall Fellsway system.</p> <p>Response: The Project will replace the traffic signal controller at</p>

Department of Conservation and Recreation	
	Fellsway/President's Landing and coordinate it with the Wellington Circle traffic signals. The Project will install new UPS systems at Wellington Circle as well.
DCR – 3	<p>Comment: DCR notes that Wellington Circle processes very high volumes of traffic along two major arterial corridors. DCR believes this system is at or near the practical limit of at-grade solutions. It is unclear what timing adjustments are being proposed by the Proponent [at Wellington Circle] at this time. DCR requests specific details on these adjustments.</p> <p>Response: Section 2.2.6.1 provides signal timing comparisons at Wellington Circle for the Existing and Build with Mitigation conditions for the Friday and Saturday time periods.</p>
DCR – 4	<p>Comment: DCR requests that the proponent provide the resulting 50% and 95% queue lengths from the proposed alterations. In addition, it is unclear what timing adjustments are being proposed at Santilli Circle by the Proponent at this time. DCR requests that additional information be provided by the Proponent on this issue in the SFEIR.</p> <p>Response: The capacity analysis summary tables for Santilli Circle with updated queue outputs from SimTraffic are provided in Section 2.2.2.2. Details regarding proposed mitigation at Santilli Circle, including proposed signal timing adjustments, are provided in Section 2.2.2.1.</p>
DCR – 5	<p>Comment: DCR notes that the signalized crossing at the top of the on-ramp from Sweetser Overpass to Revere Beach Parkway (Rte. 16) eastbound is a school crossing, and due consideration should be given toward ensuring the safety of this location.</p> <p>Response: The Proponent's mitigation design incorporates continuation of this signalized crossing, as requested. See Section 2.2.3.1.</p>
DCR – 6	<p>Comment: Based on the information in the FEIR, DCR notes it is unclear what timing adjustments are being proposed in this area [Revere Beach Parkway at Washington Avenue] by the Proponent. DCR will review and comment on proposed timing adjustments when they are developed. In addition, clarification of 50% and 95% queue lengths should be provided, similar to our comments relative to the Santilli Circle improvements above.</p> <p>Response: Section 2.2.4.1 provides signal comparisons at Revere Beach Parkway/Washington Avenue for the Existing and Build with Mitigation conditions for the Friday and Saturday time periods. The capacity analysis summary tables with updated queue outputs from SimTraffic are also provided in Section 2.2.4.2.</p>

Department of Conservation and Recreation	
DCR – 7	<p>Comment: Based on the information in the FEIR, it is unclear what timing adjustments are being proposed in this area [Revere Beach Parkway at Garfield Avenue and Webster Avenue] by the Proponent. DCR will review and comment on proposed timing adjustments when they are developed. DCR notes that consideration should be given to split phasing to eliminate interlocking left turns from Garfield and Webster Avenue.</p> <p>Response: Section 2.2.4.1 provides signal timing comparisons at Revere Beach Parkway (Route 16)/Webster Avenue/Garfield Avenue) for the Existing and Build with Mitigation conditions for the Friday and Saturday time periods. The capacity analysis summary tables with updated queue outputs from SimTraffic are also provided in Section 2.2.4.1. The Project team has reviewed the left-turning movements from Webster Avenue and Garfield Avenue and determined that two vehicles can turn at the same time, so split phasing is not required.</p>

Department of Environmental Protection	
DEP – 1	<p>Comment: Infiltration and inflow mitigation will be a necessary component to the regulatory requirements of 314 CMR. 12.00. In this regard, the proponent should meet with the city, MWRA, and MassDEP to present more detailed information, and to seek agency input. The final mitigation measures must be conditions of any sewer connection permit</p> <p>Response: See Sections 1.2.7.5 and 1.5.5.</p>
DEP– 2	<p>Comment: Recycled shells from local sources should be used for bed establishment.</p> <p>Response: In response to concerns raised by DMF, the Proponent has eliminated the previously proposed shellfish bed restoration.</p>
DEP – 3	<p>Comment: As the existing sediments may not be sufficient to support restoration, consideration should be given to amendment with sand. Sand is not as mobile as organic materials and will provide a stable base for development of peat. Sand will not hold a slope so if a slope is proposed, there will need to be terracing. Filamentous algae may inhibit growth of salt marsh vegetation. The restored salt marsh should be monitored for algae growth and algae should be raked out as necessary.</p> <p>Response: As part of the design and permitting process, the Proponent will work with DEP and others to develop soil specifications that are best suited to the final designs for the living shoreline and bank restoration.</p>

Department of Environmental Protection	
DEP – 4	<p>Comment: The proponent also should be responsive in the future should additional adaptive measures be needed, as climate impacts and public understanding of vulnerabilities are better understood.</p> <p>Response: As part of the permitting design process, the applicant anticipates developing procedures for adaptive design and management for the living shoreline area, providing a reasonable level of resiliency in the design for adaptation to extreme events and future climate change induced environmental factors (e.g., rising sea levels).</p>
DEP – 5	<p>Comment: MassDEP asks for the proponent to collaborate with the City of Everett and the Everett Citizens Foundation, to accomplish the following where feasible:</p> <p>Establishment of a school revolving fund for energy efficiency projects, establishing a residential revolving fund for efficiency/weatherization projects to reinforce and enhance energy incentives offered by MassSaver, [et.al].</p> <p>Response: The Project is providing funding to the City of Everett and the Everett Citizens Foundation as part of the Host Community Agreement. The City of Everett and the Foundation will determine the expenditure of program funds for energy efficiency, clean energy and education in the City.</p>
DEP – 6	<p>Comment: MassDEP recommends that the proponent consider charging a parking fee for spaces used by single occupancy vehicle (SOV) drivers to encourage employees to walk, bicycle, carpool or vanpool to the satellite parking facilities. Conversely, if the parking is free, the proponent can provide parking cash-out incentives to employees who would otherwise park at proposed remote locations thus encouraging employees to seek alternatives modes of transportation. While DEP acknowledges that the Proponent's effort to mitigate employee trips to the site by contracting with a third-party shuttle to transport employees to work, ultimately these employees are still driving part of the way to work when there is a wide array of transit options available. MassDEP requests that the Proponent institute more robust parking pricing measures to encourage employees to seek alternatives modes of transportation.</p> <p>Response: Sections 4.16 of the FEIR set forth an extensive program of strategies and incentives that the Proponent will implement to encourage both patrons and employees to minimize automobile travel. The Proponent expects that its extensive program of TDM measures will be effective in meeting the Project mode share goals, will continue to evaluate the results of these programs during Project operation, and will consider additional strategies and measures if needed as described in Section 2.7 of</p>

Department of Environmental Protection	
	the SFEIR.
DEP – 7	<p>Comment: The Proponent did not indicate whether the proponent will participate in the EPA SmartWay Transport Partnership, a voluntary program that is designed to increase energy efficiency and reduce greenhouse gas emissions. MassDEP requests that the proponent participate in the SmartWay program.</p> <p>Response: The Proponent will consider participating in the program.</p>
DEP – 8	<p>Comment: Because of the significant vehicle trips that the project will generate when fully operational, the proponent should install signage regarding idling in prominent locations in the parking garage, taxi stands, charter bus parking, and delivery areas.</p> <p>Response: The Proponent will install appropriate signage to discourage unnecessary engine idling.</p>
DEP – 9	<p>Comment: As recommended by MassDEP and the DEIR, the proponent is encouraged to provide direct deposit for all employees.</p> <p>Response: The Proponent will provide direct deposit for all employees.</p>
DEP – 10	<p>Comment: The proponent should evaluate the feasibility of providing electric vehicle charging stations at the leased offsite employee parking locations.</p> <p>Response: The Proponent will evaluate the feasibility of providing these charging stations.</p>
DEP – 11	<p>Comment: MassDEP recommends that the project proponent meet with MassDEP to discuss plans regarding the 1-megawatt (MW) micro-turbine cogeneration plant, any boiler units in the size range of 10-40 MMBtu/hr heat input, and any emergency engine generators 37 kilowatts (kw) or greater, as soon as more detailed designs are available.</p> <p>Response: All boilers and emergency generators will be permitted through the self-certification provisions of DEP's ERP, 310 CMR 7.26. The Proponent will meet with Mass DEP prior to permitting the 1-MW micro-turbine cogeneration plant and other fuel-burning equipment.</p>

Division of Marine Fisheries

DMF – 1	<p>Comment: The applicant has also proposed construction of an oyster reef and soft-shell clam re-seeding areas as pro-active enhancement. Unfortunately the project site is within GBH4.0, a prohibited area. We</p>
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Division of Marine Fisheries	
	<p>cannot approve shellfish enhancement in this area because water quality is poor and is contaminated with unsafe bacterial levels posing a significant risk to public health [5]. Before shellfish enhancement can occur in the Mystic River, water quality improvements need to be addressed. To that end, there are several opportunities for habitat enhancement and water quality improvements in the Mystic River Watershed. There are also other areas in Boston Harbor, including nearby conditionally restricted areas, where shellfish enhancement could potentially be located. Marine Fisheries would be happy to continue to work with Wynn to identify a proactive restoration project that would offer a beneficial contribution to the Mystic River watershed and Boston Harbor.</p> <p>Response: The Proponent acknowledges the DMF concerns regarding this proposal and has abandoned it.</p>

Massachusetts Department of Transportation	
MassDOT – 1	<p>Comment: Given the urban context of the project, the commitment to a strong TDM program, and our ability to hold the Proponent accountable to site trip reduction strategies through monitoring and reporting, MassDOT agrees that the project would result in a significant number of non-private vehicular trips. However, in the FEIR as filed, the calculation methods used to estimate the patron and employee trips by mode share a confusing and may, in effect, be “double counting” trips that are multi-modal. As an example, the analysis estimates that 2,811 patrons will access the site on a typical Saturday via the MBTA Orange Line and estimates that all of them will take the patron Orange Line shuttle from the station to the site. As a result, the patrons have been counted as arriving both via private mass transportation (on the shuttle) and via public transit (the Orange Line). We discussed this issue with the Proponent subsequent to the filing of the FEIR and they have adjusted their methodology to correct this issue, and we remain comfortable that the project would result in a significant mode split for non single-occupant vehicles.</p> <p>Response: The revised mode split analysis in consultation with MassDOT can be found in Section 2.1.2 of the SFEIR.</p>
MassDOT – 2	<p>Comment: As currently defined in the FEIR, traffic mitigation along the Route 99 corridor (Broadway and Alford Street) would continue to produce unacceptable services levels, congestion, delays, and queues that have the potential of negatively impacting upstream intersections. This situation would be particularly evident during the Friday PM peak hour.</p> <p>Specifically, those locations most affected would include:</p>

Massachusetts Department of Transportation	
	<ul style="list-style-type: none"> • Site Driveway/Mystic Street/Broadway (Route 99); • Beacham Street/ Broadway; • Bowdoin Street/ Broadway; and • Dexter Street/Alford Street (Route 99). <p>Subsequent to filing the FEIR, the Proponent has determined that the intersection analysis tools used in the FEIR may have exaggerated projected queues, incorrectly suggesting that upstream or downstream intersections may be blocked. The SFEIR should, therefore, include a revised analysis with a summary table that shows 50th and 95th percentile queue lengths along with available queue storages.</p> <p>Response: Section 2.2.1.2 provides 50th and 95th percentile queue analysis, which was conducted using Simtraffic, a simulation-based traffic modeling software. The new analysis indicates that there will not be issues with upstream intersections. See also Appendix B.</p>
MassDOT – 3	<p>Comment: In addition to these defined problems with queues, the FEIR intersection operations calculations identify several lane groups/turning movements within the Route 99 corridor that, with mitigation in place, would continue to operate at service levels that are lower than acceptable. It should be noted that corresponding overall intersection operations are within acceptable standards, but there should be balance provided whereby all lane groups/ approaches are afforded an opportunity to accommodate their specific demand. The SFEIR should investigate additional mitigation measures such as new lane configurations such as phasing modifications. Optimization of signal timing and improvements to signal system coordinate to achieve better operating conditions.</p> <p>Response: The revised analysis of Lower Broadway/Alford Street in consultation with MassDOT can be found in Section 2.2.1 of the SFEIR.</p>
MassDOT – 4	<p>Comment: The City of Boston is currently proposing to reconstruct the Rutherford Avenue corridor with more consideration given to a “Complete Streets” design approach from North Washington Street Bridge to Sullivan Square. The project specifically involves reducing the roadway from three lanes to two lanes in each direction, eliminating six bridges to create at-grade intersections, and providing adequate pedestrian, bicycle, and public transit accommodations. The design is currently funded with the use of federal funds secured with an earmark; therefore. The MassDOT Highway Division is overseeing the study and design of the project on behalf of FHWA. The project has already advanced to the design stage after a comprehensive public participation process, and the current design was selected as the preferred alternative to accommodate future traffic and the vision for the surrounding land use. The FEIR does not adequately document what impacts, if any, the project would have on the future design of the corridor. Subsequent to the filing of the FEIR, MassDOT met</p>

Massachusetts Department of Transportation	
	<p>with the Proponent to discuss this concern in more detail and has achieved a greater level of comfort on the issue. In drafting the SFEIR, the Proponent should better document the relationship between the project's proposed mitigation and the planned future condition of the Rutherford Avenue.</p> <p>Response: The Proponent worked with MassDOT, the MBTA, and BTD to develop the mitigation proposed for the vicinity of Sullivan Square in Section 2.2.7 of the SFEIR. The Proponent will continue to refine that plan as we move toward final design and construction.</p>
MassDOT – 5	<p>Comment: The FEIR includes conceptual plans and capacity analysis for the proposed interim improvements for Sullivan Square as requested in the DEIR comment letter. However, these plans do not include sufficient information to review proposed intersection geometrics in the vicinity of Sullivan Square with respect to traffic safety. Of particular concern are the intersections of Cambridge Street/Spice Street and Cambridge Street/Maffa Way/ Sullivan Square Rotary.</p> <p>Response: See response to Mass DOT-4.</p>
MassDOT – 6	<p>Comment: A triple right-turn lane configuration is proposed in the FEIR as mitigation along the Cambridge Street eastbound approach to Maffa Way. MassDOT would not typically support any design having more than a dual turn lane. The prevailing opinion has been that, given a triple lane design, one of the three lanes would be vastly underutilized (independent of actual demand (and that lack of adequate receiving area width and length could create an unsafe condition. Driver unfamiliarity with such a design could also be both a safety and operational issue. Subsequent to the filing of the FEIR, MassDOT and the Proponent discussed some possible tweaks to this design, which should be more fully addressed in the SFEIR.</p> <p>Response: See Response to MassDOT 5.</p>
MassDOT – 7	<p>Comment: In addition, MassDOT notes some discrepancies between the SYNCHRO traffic software and the VISSIM simulation model used to verify the mitigation plan performance measures. The VISSIM model included a traffic control signal at the Cambridge Street/Spice Street intersection. The SYNCHRO intersection analysis did not. It is critical that the signal locations and intersection approach geometry (e.g., number of lanes, lane width, lane usage, et.) be the same for each analysis method. Peak hour queues predicted by SYNCHRO are much longer along Cambridge Street eastbound than those indicated by the VISSIM model. During our review of the FEIR, MassDOT contacted the proponent to discuss these anomalies and subsequently received a corrected VISSIM model.</p> <p>Response: See revised analyses in collaboration with MassDOT discussed</p>

Massachusetts Department of Transportation	
	in Section 2.1.3 of the SFEIR.
MassDOT – 8	<p>Comment: As part, the Proponent should describe further revisions to intersection analyses and projections of queue lengths that have been submitted to MassDOT subsequent to the filing of the FEIR. Additional revisions to the proposed Main Street/Maffa Way/Cambridge Street/Alford Street intersection geometry should also be described, consistent with ongoing discussions with MassDOT. It should be noted however, that the City of Boston would ultimately be responsible for reviewing, approving, and the permitting such improvements.</p> <p>Response: Section 2.2.7 includes updated design plans and capacity analyses reflecting proposed improvements to the intersection of Cambridge Street/Maffa Way/Alford Street as well as other locations in Sullivan Square. The Proponent acknowledges the role of the City of Boston in the permitting of these improvements and looks forward to continued collaboration on these improvements.</p>
MassDOT – 9	<p>Comment: The SFEIR should include an evaluation of whether two-way access is, or can be, provided between the Sullivan MBTA Busway and the Charlestown Bus Garage, using Beacham Street signalized intersections with Main Street and Maffa Way. This would significantly reduce the number of MBTA buses accessing the MBTA garage in the traffic circle, thereby improving traffic operations.</p> <p>Response: See Section 2.2.7 of the SFEIR.</p>
MassDOT– 10	<p>Comment: As a result of continuing discussions between MassDOT and the Proponent, conceptual plans (alignment and profile) of the preferred alternative for Santilli Circle have been revised at an appropriate scale and level of detail. While MassDOT believes the alternative has merit, final conceptual plans should be provided in the SFEIR to allow for a full public review of the alternative.</p> <p>Response: See Section 2.2.2 of the SFEIR.</p>
MassDOT– 11	<p>Comment: The FEIR includes a capacity analysis Sweetser Circle with these improvements in place that indicates the LOS, delay, and queue lengths would significantly improve as a result of these improvements. The analysis was based on the SIDRA traffic software, which is generally the standard to conduct traffic analysis for roundabouts and/or traffic circles. On the other hand, the VISSIM analysis indicates significantly different performance measures for the same location. For example, 95th percentile queue lengths on the Route 16 westbound off-ramp to Sweetser Circle extend back to the Route 16 mainline and could create both safety and operational issues. The SFEIR should correct this discrepancy.</p>

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	Response: See Section 2.2.3 of the SFEIR and Appendix B.
MassDOT- 12	<p>Comment: In addition to these improvements, the proponent has assumed in the DEIR that the planned long-term improvements at Santilli Circle would result in a direct improvement to traffic operations within Sweetser Circle. The proposed improvements at Santilli Circle have since changed as described in the FEIR. The SFEIR should clarify whether this original assumption is still valid with the modified improvement plan proposed for Santilli Circle. In addition, the performance measures used to demonstrate how Sweetser Circle would benefit from the improvements at Santilli Circle should be provided in the SFEIR.</p> <p>Response: The proposed Santilli Circle mitigation is not expected to affect conditions at Sweetser Circle. The Proponent's proposed mitigation at Sweetser Circle can be found in Section 2.2.3 of the SFEIR.</p>
MassDOT- 13	<p>Comment: MassDOT supports the implementation of these improvements [at Wellington Circle] as interim measures, but this location has been under consideration for study of a complete redesign to address existing deficiencies and the impacts of a number of recently proposed, private development projects. The proponent has committed to contribute the study and implementation of a long term- solution for this location, and the SFEIR should reflect this commitment.</p> <p>Response: See Section 2.2.6.1 of the SFEIR and proposed MassDOT Section 61 findings.</p>
MassDOT- 14	<p>Comment: The Proponent would be offering shuttle service between Wellington Station and the site. The FEIR does not provide information on how its service schedule would align with the Orange Line schedule, the capacity of the shuttle system to accommodate both patrons and employees, and whether the frequency of service would make it a viable alternative for the employees, and whether the frequency of service would make it a viable alternative for employees and patrons who could travel via Wellington Station. Subsequent to the filing of the FEIR, the proponent provided a preliminary comparison of shuttle service arrivals and departures relative to Orange Line service. This analysis should be further refined and documented in the SFEIR. The Proponent should continue to coordinate with MassDOT and the MBTA in determining how this service would interact with existing MBTA bus routes that stop at Wellington Station, both in competing for berthing space and in potentially duplicating the service that already exists.</p> <p>Response: See Section 2.4.3 of the SFEIR.</p>
MassDOT- 15	<p>Comment: Through discussions between the Proponent and the MBTA, it was determined that no private shuttle buses will be provided between the</p>

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	<p>Sullivan Square MBTA station and the site. This is due to the limitation of the station to accommodate additional vehicles at this already congested facility. In addition, there are three existing bus routes that travel along Route 99 between the station and the project site, with stops very close to the site. Bus Routes 104, 105, and 110 operate near the site, with headways varying widely from 15 minutes to 70 minutes. Service during late nights and weekends is also limited. In the SFEIR, the proponent should provide analysis based on their employees expected journeys to work to determine if this existing MBTA service will be sufficient to handle the demand connecting service to Sullivan Station.</p> <p>Response: See Section 2.4 of the SFEIR.</p>
MassDOT -16	<p>Comment: Since a parallel shuttle service is not feasible, the proponent should work with the MBTA to determine how existing service may be enhanced to improve the user experience. Alternatively, they must show that their shuttle service from Wellington Station will be a more attractive option to both employees and patrons with the understanding that most travelers arriving from the City of Boston and points south will find Sullivan Square to be a more attractive connecting point.</p> <p>Response: See Section 2.4 of the SFEIR.</p>
MassDOT -17	<p>Comment: The DEIR included an Orange Line capacity analysis that identifies potential mitigation to improve headways from 10 minutes to 8 minutes during the off-peak hours to keep average passenger loads within the crowding standard. However, the FEIR now shows that there is ample remaining capacity even without headway improvements. As a result of ongoing discussions with the Proponent, it appears that this discrepancy is due to a difference in the peak load point assumed for the Orange Line, as well as differences in the load standard for core stations and non-core stations (as defined in the MBTA's Service Delivery Policy). These issues should be addressed more fully in the SFEIR, and the Proponent should provide a revised analysis of projected Orange Line peak loads for weekday and weekend service days between Wellington and Back Bay Stations. Should the projections show loading standards to be violated, the Proponent should discuss with MBTA and MassDOT providing financial support for increased Orange Line service.</p> <p>Response: See Section 2.4.2 of the SFEIR.</p>
MassDOT -18	<p>Comment: The FEIR continues to indicate that Malden Center Station and Wellington Station would be the possible locations for Shuttle pick-up and drop-off. The MBTA specifically requested that FEIR identify, for each of the possible stations it will serve by shuttle, where passengers will board and alight those shuttles. For the MBTA to determine if these shuttle drop-off and pick up locations are feasible, more detailed shuttle-berthing plans</p>

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	<p>showing how these private shuttles will access the stations are required in the SFEIR to ensure that the berthing areas and shuttle routes at the stations do not interfere with existing MBTA bus routes. In addition. The Proponent should demonstrate in the SFEIR, preferably with graphics, what the accessible path of travel would be for customers transferring between these shuttles and the MBTA services. Of particular importance to the MBTA are all codes and standards related to the Americans with Disabilities Act (ADA), and the Massachusetts Architectural Access Board MAAB), and the Federal Transit Administration (FTA) regulations and guidance.</p> <p>Response: See Section 2.4.3 of the SFEIR.</p>
MassDOT -19	<p>Comment: The locations of the bus and the pedestrian crossing movements could further worsen the operations of traffic signals in the corridor, which are already operating at an unacceptable LOS. The MBTA continues to be available to engage in these conversations so that a specific proposal can be shown in the SFEIR.</p> <p>Response: See Section 2.2.1 of the SFEIR.</p>
MassDOT -20	<p>Comment: In addition, the SFEIR should specifically address what the impacts to MBTA bus service would be due to traffic generated by the project. The MBTA assumes that the SFEIR will provide a turning movement analysis and an LOS analysis for all affected intersections. The MBTA requested that the FEIR present, in a tabular format, an assessment of which of these intersections are utilized by MBTA buses and how their timing or turning movements may be affected by the increased traffic and/or proposed roadway changes generated by the project. This particular concern was not specifically addressed in the FEIR, but subsequent to its filing, a summary table of intersection delays and projected bus travel times was completed. This additional information suggests that there are no cumulative travel time increases on MBTA bus routes along Route 99, but a full refined analysis of all impacted bus routes should be presented in the SFEIR.</p> <p>Response: See Section 2.4.1 of the SFEIR.</p>
MassDOT -21	<p>Comment: As currently envisioned, the Proponent seeks permanent property rights from the MBTA for the Project. The Proponent is seeking to build the entrance to its facility from Broadway across the southeast corner of the MBTA site. This access road will overlap with the MBTA's main secure (i.e., gated) entrance to the site, thus requiring that the entrance will be relocated. This relocation changes the orientation and usage of the site, since all employee and truck deliveries are made through this gated entrance. MassDOT feels it is critical that this information be laid out explicitly and with sufficient detail in the SFEIR so that the MBTA can determine whether or not this proposal would adversely affect critical</p>

Massachusetts Department of Transportation	
	<p>transit operations.</p> <p>Response: See Sections 1.2.3 and 2.2.1.2 of the SFEIR.</p>
MassDOT -22	<p>Comment: In particular, the SFEIR describe how MBTA buses, as well as delivery trucks, will access the site from the new entrance and with the new service road in place. Further analysis is needed showing whether all trucks and buses expected to use the site will continue to be able to access the loading docks and entrances to the building. Turning movements for all potential vehicles must be examined to see if there is any loss of functionality resulting from the new entranceway as well as the new service roadway.</p> <p>Response: Appendix B provides a detailed analysis of the proposed MBTA maintenance facility access and on-site operations developed in collaboration with the MBTA.</p>
MassDOT -23	<p>Comment: MassDOT requested in the DEIR comment letter that the Proponent expand the scope of the pedestrian improvements (including in the Sullivan Square area) to include additional intersections within walking distance of the project. This particular comment is not specifically addressed in the FEIR.</p> <p>Response: Section 2.2.7.1 provides additional information regarding pedestrian access from the Project Site to Sullivan Square. As part of the proposed mitigation, the Proponent will reconstruct sidewalks on the west side of Sullivan Square from the station to the limits of the recently reconstructed Alford Street Bridge project.</p>
MassDOT -24	<p>Comment: The Proponent discussed a potential connection from the new MBTA Assembly Station across the Mystic River to the project site. This alternative would significantly shorten the walking distance from the Orange Line and would be an attractive option to walk to the site. However, this option would require extensive permitting and collaboration from several entities for its implementation. The Proponent has indicated a willingness to contribute to the implementation should the construction of this option become feasible. A full and detailed description of potential pedestrian improvements should be included in the SFEIR.</p> <p>Response: See Response to EOEEA-24.</p>
MassDOT -25	<p>Comment: The Proponent has indicated in discussions that it would work with the City of Everett to seek an alternative to connect bicycle lanes to Route 99, north of Route 16. Further, the Proponent has noted that based on the latest discussion with the City of Everett, the Rail Trail project which would improve bicycle connections along Route 99, is expected to be constructed in the near future. In light of the credits for bicycle trips and</p>

Massachusetts Department of Transportation	
	<p>the commitment to hire locally, adequate bicycle facilities should be provided to increase use and/or justify the credit. These accommodations should be clearly described in the SFEIR, and more details provided as to the feasibility of their implementation and the Proponent's commitment to ensure the sustainability of these measures.</p> <p>Response: Section 2.2.3.2 outlines improved bicycle connections through Sweetser Circle that facilitate bicyclist access to and from Broadway (Route 99).</p>
MassDOT -26	<p>Comment: The Proponent has indicated that a revenue control system will be installed in the underground parking garage and pricing strategies would be implemented to manage parking. This would help reduce single-occupancy vehicle trips and encourage the use of alternative transportation modes. The Proponent should commit to monitor the effectiveness of the pricing strategies and adjust prices as needed to meet the goals of site trip reduction and efficient site access and circulation.</p> <p>Response: The Proponent has committed to monitor the effectiveness of parking pricing strategies as discussed in Section 2.7.</p>
MassDOT -27	<p>Comment: The revised TDM plan is generally acceptable to MassDOT and responds appropriately to specific comments made in our prior comment letters. The Proponent should continue to work with MassDOT and the parties identified to further refine the plan, as well as to monitor the program after implementation and to make changes as necessary.</p> <p>Response: The Proponent will continue to refine and monitor the TDM plan, as necessary.</p>
MassDOT -28	<p>Comment: In summary, ongoing discussions with the Proponent have addressed a number of issues with the mitigation program for the project, and MassDOT appreciates the collaborative approach the Proponent has taken. We look forward to continuing to work with the Proponent to address remaining issues in advance of the filing of the SFEIR. Coordination with the MassDOT Highway, Rail & Transit, and Aeronautics Divisions should continue, as should coordination with the Office of Transportation Planning. If you have any questions regarding these comments, please contact me at (857)368 -8862.</p> <p>Response: No response needed.</p>

Massachusetts Port Authority	
Massport – 1	<p>Comment: Massport will continue to be engaged in the technical review of this project through the FAA 7460 process. We also encourage the project team to review FAA's Technical Guidance for Evaluating Selected Solar Technologies on Airports (Nov. 2010) as they move to finalize building design.</p> <p>Response: See Section 1.5.4 and Appendix E, Aeronautical Impact Statement.</p>
Massport – 2	<p>Comment: The FEIR still lacks a detailed analysis that shows the markets from which anticipated employees will be drawn, wage rates, job titles, and effects on neighboring communities and major employers including Logan Airport. It would have been useful if the proponent, as we requested, had analyzed the current and projected supply and demand for labor in the communities surrounding the proposed development.</p> <p>Response: See Section 1.5.4. The Proponent has met with representatives of Massport to discuss these requests, and has made a commitment to continue to meet to review and resolve concerns regarding the impact of the Project on Massport's Logan Airport operations.</p>
Massport – 3	<p>Comment: Consequently, we reiterate our suggestion that well in advance of opening the proponent undertake a comprehensive analysis of the impacts associated with the creation of the estimated 4,000 permanent new jobs and 4,000 construction jobs; this level of employment has the potential to affect the labor pool for Logan Airport. This could include a comprehensive analysis of jobs created, type of jobs, wages and skills in the context of overall jobs created as well as the impact on the Logan Airport labor pool. This can be accomplished through the development of a workforce supply and demand model that estimates the workforce needs, skills required, wages and capture basin for the casino workforce when fully developed. This will allow for an analysis of the workforce catchment area and the likelihood of attracting and finding an adequate pool within the targeted capture geography. Existing and estimated future unemployment rates should be analyzed to determine if there is an adequate and available labor pool. We recommend a job training program that addresses any issues identified in the analysis.</p> <p>Response: See response to Massport-2.</p>
Massport – 4	<p>Comment: The design horizon is noted in the DEIR and FEIR to be 2023. It was projected that the casino is expected to open approximately 3 years (36 months) after the casino license is awarded. Should the license be awarded in 2014, it follows that the casino may open in late 2017 (approximately 6 years prior to the design horizon). Thus, it is expected the casino would operating prior to and during the construction of the roadway improvement projects. Ideally, the No Build and Build conditions</p>

Massachusetts Port Authority	
	<p>would have been analyzed without these improvements in place to accurately assess the impacts from the casino that may exist until the completion of the roadway improvement projects.</p> <p>Response: The No Build and Build conditions, as analyzed in the FEIR, were analyzed without the proposed mitigation in place, as is the industry standard, as well as in the Build with Mitigation condition. The proposed transportation mitigation will be completed prior to opening.</p>
Massport – 5	<p>Comment: Even though the intersections proposed are located in direct routes to Logan Airport, the proponent notes that the study area has already been approved by MEPA and that they aren't required to analyze other intersections. While MEP has not included the intersection of William Streets at Spruce Street as part of the analysis, this intersection will be impacted by the project and it also serves as the east/west connector to Chelsea and Route 1A.</p> <p>Response: Analyses indicate that the Project will only add a maximum of 29 trips to the intersection of Williams Street/Spruce Street during the Friday p.m. peak hour. The Friday p.m. "real" peak hour would be less than that. Because the Project will only add a small number of trips to the intersection, the impact will be negligible.</p>
Massport – 6	<p>Comment: According to FHWA guidance, k-factors can be estimated using the values from nearby roadways with similar characteristics. The proponent could have listed the roadways used as reference to back up their estimations. Specifically, k-factors are determined by using an ATR unit to measure the volumes for every hour of every day for one year. The k – factor is the 30th highest hourly volume in the year divided by the Annual Average Daily Traffic (AADT). Typically This can be estimated by completing an ATR count for 48 hours, and dividing the peak hour by the average ADT between the two days. Speeds are typically determined by using an ATR unit during the same period the ADT volumes are being collected.</p> <p>Response: No response needed.</p>
Massport – 7	<p>Comment: While the data collection process was approved by MassDOT/MEPA, the typical weekday data could be used to validate the Friday and Saturday data used for the analysis.</p> <p>Response: No response needed.</p>
Massport – 8	<p>Comment: Information on how the proponent plans to prohibit Kiss and Ride activity should be shared.</p> <p>Response: The Proponent will make all employees aware of policies</p>

Massachusetts Port Authority	
	<p>regarding kiss and ride. Those policies will include disciplinary action should employees violate those policies. The Proponent is providing convenient shuttle service from employee parking, as well as a neighborhood employee shuttle service, which will provide suitable alternatives to kiss and ride.</p>
Massport – 9	<p>Comment: The proponent addressed taxi trips, water shuttle trips, and premium park and ride trips associates with Logan Airport activities. However, rental car trips were not explicitly addresses and may have been included in another category. Please clarify.</p> <p>Response: Rental car trips are included in the overall auto trips for the Project.</p>
Massport – 10	<p>Comment: The FEIR discusses the impacts to City of Boston taxis on a typical Saturday, and it did not discuss impacts to area taxis on Friday evening when taxi demand is similar to Saturday. The proponent could perform additional demand analysis related to the proposed project's impact on taxi availability and operations at Logan Airport, and to identify mitigation, as appropriate. Massport requests additional discussion on this topic.</p> <p>Response: The Proponent has consulted with and provided additional information to Massport personnel concerning topics of common interest, including taxi utilization, and agreement was reached to continue coordination. See Section 1.5.4.</p> <p>The Proponent envisions that most patrons arriving via Logan Airport will use a limousine service instead of taxis. Taxi demand at the Project Site cannot be met by taxis with Boston taxi medallions because the Project Site is located in Everett. New taxi services will very likely be created in Everett to meet the newly created demands of the Project. The Proponent will also pursue a "mutual aid" approach to taxi services at Logan Airport, under which Everett taxis could pick passengers up as they arrive at Logan Airport and transport them to the Project Site. New car services (such as Uber and Lyft) will absorb some of the demand.</p>
Massport – 11	<p>Comment: The proponent has committed to constructing some of the proposed mitigation in the FEIR, but not all, prior to the proposed opening of the casino. Traffic impact in the vicinity of Logan Airport could be a concern if the improvements are not completed prior to the project opening.</p> <p>Response: The Proponent has committed to completing all of the applicable proposed roadway improvement mitigation prior to opening. This commitment is reiterated in Chapter 3.</p>

Massachusetts Department of Energy Resources	
DOER- 1	<p>Comment: It is possible that when an application for a building permit is submitted, the revised stretch code which will be based on 2010 ASHRAE 90.1 Appendix G will be in effect. Due to the increased performance requirements of this code, it is likely that the base case EUI will be lower...DOER encourages the project to revise the model based on the 2010 90.1 App. G and to check whether the %EUI reduction is at least 15%.</p> <p>Response: See Section 1.2.7.1 and Appendix C. This supplemental analysis contemplates the possibility that a building permit application for the Project is made after July 1, 2015, the date the Stretch Code takes effect in Everett.</p>
DOER - 2	<p>Comment: DOER urges the Proponent to look into this issue [Hotel block use of more gas than the baseline case] and evaluate which the suggested possible measures listed [in the comment letter] for attaining a(n) incremental gain in efficiency could be applied to reduce the Hotel gas consumption.</p> <p>Response: The use of 2% more natural gas for heating in the Mitigation Case vs. Base Case for the hotel tower is correct. Building construction is so airtight and the building enclosure so well-insulated in the Base Case (by Code) that a measureable amount of space heating demand is provided in the colder months by waste heat from indoor appliances and lighting. The Mitigation Case reduces electricity used by both indoor appliances and lighting and thus waste heat from those sources. As a consequence, slightly more natural gas must be burned to meet heating demand.</p>
DOER- 3	<p>Comment: [suggest] Increase the R-Value of the roof to R-30.</p> <p>Response: Roof insulation will be increased to R-25.</p>
DOER- 4	<p>Comment: Oversize the cooling tower: Increase heat transfer capacity to supply 75F condenser water during peak cooling intervals.</p> <p>Response: Sizing of the cooling tower will occur during detailed mechanical design. The Proponent continues to commit to measures identified in the FEIR to reduce GHG emissions.</p>
DOER- 5	<p>Comment: Select condensing hot water boilers with an AFUE of at least 87%.</p> <p>Response: The size and type of hot water boilers will be specified during detailed mechanical design.</p>
DOER - 6	<p>Comment: Use variable speed drives for all major circulating pumps and</p>

Massachusetts Department of Energy Resources	
	<p>fans (including cooling tower fans).</p> <p>Response: It is likely variable speed drives will be used, though this detail will be determined in the detailed mechanical equipment design.</p>
DOER- 7	<p>Comment: It is stated ...that the Project intends to achieve an overall reduction in LPD of 20%. The overall reduction shown [in the FEIR] of modeling input values is 15%. The DOER encourages the proponent to attain at least a 20% reduction in final design.</p> <p>Response: All design LPD values are 20% below the base case values. This can be verified using the data in Table 6 on page 33 of the FEIR GHG report. Design values for pressure drops will be determined during detailed mechanical design.</p>
DOER- 8	<p>Comment: Increase the size of the solar PV system by mounting panels on the canopies covering the open parking areas.</p> <p>Response: The PV system size is already maximized. Note that there are no open parking areas on the Project Site.</p>
DOER - 9	<p>Comment: Install sufficient energy sub-metering such that the building operations can be tailored to actual usage patterns to provide the maximum efficiency.</p> <p>Response: Energy sub-metering may be used depending on the structure of lease agreements. This detail will be determined at a later date.</p>
DOER- 10	<p>Comment: DOER encourages the proponent to include in the [S]FEIR a commitment to a CHP system that it will be designed to be able to both black start and operate in an island mode.</p> <p>Response: The suggestions for black start and island mode operations will be considered at the stage of detailed mechanical design.</p>
DOER - 11	<p>Comment: In order for the CHP system to deliver resiliency, the central plant and critical electrical and mechanical equipment, as well as gas control valves must be located such that they will remain dry and operable in the event of storm caused flooding.</p> <p>Response: Critical electrical and mechanical equipment will be safely located above flood stage elevation.</p>

City of Everett Mayor- Carlo DeMaria, Jr.	
Everett – 1	<p>Comment: The traffic analysis presented in the FEIR omits detailed discussion of Main Street and upper Broadway in the City of Everett. As the City has indicated to the Wynn team throughout the project development process, mitigation for the project should include improvement of the traffic signal system along Main Street to provide coordinated traffic control, allowing for safe and efficient movement of vehicular and pedestrian traffic along this corridor. In addition to upgrading existing signalized intersection, the installation of a new signal at the currently un-signalized intersection of Main Street with Linden Street should be considered to mitigate increases in delay at that location reported in the DEIR.</p> <p>Response: Several locations along Upper Broadway in Everett are included in the mitigation package. Additional analysis of those locations was not needed in the FEIR, but the commitment to mitigation is provided in Chapter 3.</p>
Everett – 2	<p>Comment: As part of its mitigation program along Revere Beach parkway, Wynn should provide upgrades to crosswalks and sidewalks to bring signalized intersections into compliance with ADA and AAB guidelines, including investigation of improved traffic signal phasing for pedestrians and shortening of crossing distances.</p> <p>Response: As discussed in Sections 2.2.2 and 2.2.3, ADA- and AAB-compliant pedestrian accommodations are being included in mitigation plans for the Santilli Circle and Sweetser Circle rotaries.</p>
Everett – 3	<p>Comment: The post-development transportation monitoring program within the City of Everett listed in Section 4.17 of the FEIR is limited to lower Broadway, Sweetser Circle, and Santilli Circle. The geographic extent of the monitoring program must be expanded to measure impacts along with the Main Street and upper Broadway corridors, as well as along Revere Beach Parkway between Sweetser Circle and the Chelsea city line. At a minimum, the monitoring program should be expanded to include Broadway at Ferry Street, Broadway at Chelsea Street/Norwood Street, main Street at Tileston Street/Oakes Street, and Revere Beach Parkway at Second Street. Additional locations may be required once satellite parking locations are finalized.</p> <p>Response: The monitoring program has been expanded as requested, as detailed in Section 2.7.</p>
Everett – 4	<p>Comment: Nearly one third of all project-generated trips will pass through Sweetser Circle. As part of the reconfiguration of Sweetser Circle, railings, curbs, sidewalks, lighting, pedestrian signals, and landscaping should be upgraded to provide a comprehensive rehabilitation of this critical location. Additionally, the existing pavement surface on the Broadway</p>

City of Everett Mayor- Carlo DeMaria, Jr.	
	<p>bridges over MBTA is in poor condition and should be rehabilitated a part of Sweetser Circle improvement.</p> <p>Response: The proposed improvements at Sweetser Circle will include reconstruction of all sidewalks and pedestrian ramps to be ADA-compliant, replacement of railings, and additional landscaping. The entire circle will be repaved as well. Details regarding the proposed mitigation can be found in Section 2.2.3.</p>
Everett – 5	<p>Comment: To improve non-motorized access between the site and points north, Wynn should, pending agreements with MBTA, extend the Bike-to-the-Sea trail along the MBTA right-of-way beneath Revere Beach Parkway to the Wynn site as part of the Santilli Circle improvements. Please note that this ROW is owned by the MBTA, and therefore close coordination and cooperation with MBTA is needed.</p> <p>Response: Section 2.5 discusses proposed pedestrian and bicycle connections to the Project Site.</p>
Everett – 6	<p>Comment: Shuttle routes and the location of satellite parking lots within the City of Everett have not yet been identified as of the submission of the FEIR. Wynn must continue to work closely with the City in the establishment of these routes and ensure that any potential increases in traffic along these routes or in the vicinity of proposed satellite parking is adequately accommodated. This includes safe and efficient access and egress as well as circulation and a sufficient parking supply. All on-street shuttle stops and primary pedestrian routes to shuttle stops must be fully compliant with ADA and AAB guidelines.</p> <p>Response: The location of the employee lot in Everett is yet to be determined; it is planned to be located in a lot east of Broadway (Route 99) and south of Revere Beach Parkway (Route 16). See Figure 2-92. Exact shuttle routes to this lot will be finalized when the lot location is determined. Neighborhood shuttle routes will be flexible depending on individual passenger demand.</p>

City of Medford Mayor – Michael J. McGlynn	
Medford – 1	<p>Comment: I have found that more serious mitigation commitments must be made by Wynn MA to ensure that mobility and economic growth in the city are not hampered by the casino project. This conclusion is bolstered by findings in the letter written by the City's traffic consultant, Greenman-Pedersen, Inc., which is attached to remarks by City's office of Community Development. In their opinion and mine, the most pragmatic mitigation strategy begins with a grade-separated solution to the roadway at</p>

City of Medford Mayor – Michael J. McGlynn	
	<p>Wellington Circle.</p> <p>Response: Section 2.2.6 of the SFEIR and the Proponent’s Surrounding Community Agreement with the City of Medford reiterate the Proponent’s commitment to contribute to funding of a study of long-term mitigation options at Wellington Circle. In the short-term, the Proponent will implement the proposed mitigation measures detailed in Section 2.2.6.</p>
Medford – 2	<p>Comment: Inadequate mitigation at I-93 SB Exit 31 Off-Ramp to Mystic Valley Parkway.</p> <p>Response: The Proponent has committed to perform a Road Safety Audit (RSA) at this location.</p>
Medford – 3	<p>Comment: These items are further discussed below. Please refer to the letter submitted by GPI engineering team for technical details and all other concerns raised by traffic engineers.</p> <p>Response: No response needed.</p>
Medford – 4	<p>Comment: Mitigation at I-93 SB Exit 31 Off-Ramp</p> <p>Project-related traffic will exacerbate congestion for drivers in Medford as well as the tens of thousands of I-93 drivers whose morning commutes are already encumbered by the overflowing queues at Exit 31 every day, especially at the vital left –turn towards Wellington Circle and ultimately the Project Site. Regional mobility and growth, therefore, relies on the Proponent’s willingness to deliberately address what has been identifies as a major problem in the FEIR but disappointingly has been left without a viable solution under the currently proposed mitigation plan. Even with proposed signal optimization, the intersection is projected to provide an inadequate service level. The City requests a more robust physical mitigation strategy at this intersection.</p> <p>Response: Section 2.2.6 of the SFEIR and the Proponent’s Surrounding Community Agreement with the City of Medford reiterate the Proponent’s commitment to contribute to the funding of a study of long-term mitigation options at Wellington Circle. In the short-term, the Proponent will implement the proposed mitigation measures detailed in Section 2.2.6.</p>
Medford – 5	<p>Comment: Traffic Impact of Employee Off-Site Parking at Station Landing Garage</p> <p>The FEIR does not adequately estimate the traffic impact entailed in Medford’s service as a transportation hub. The FEIR projects use of up to 900 parking spots at the Station Landing Garage, in the heart of Wellington Circle. However, the FEIR seemingly does not account for traffic impacts of</p>

City of Medford Mayor – Michael J. McGlynn	
	<p>those additional vehicle trips as well as the shuttle bus trips. While Medford understands the goals of Wynn’s Transportation Demand Management program, any additional vehicle trips at Wellington Circle must be met with additional mitigation commitments.</p> <p>Unaccounted-for employee vehicle trips would cause unbearable stress on Wellington Circle’s already fragile, and under a Build scenario, quickly degrading, transportation capacity. The City requests the Proponent clarifies, revises, and further analyses their traffic estimations to better reflect reality.</p> <p>Response: The FEIR analysis did account for the employee trips to the Station Landing garage as well as Project shuttle trips. Section 2.3.1 describes the Project’s plan to lease up to 800 spaces at three off-site parking facilities to accommodate employee parking. The Proponent currently expects to lease approximately 300 spaces at the Station Landing Garage. Medford’s role as a transportation hub was agreed to by the City of Medford in its Surrounding Community Agreement with the Proponent and, pursuant to such agreement, the Proponent is compensating the City of Medford for all adverse impacts, if any, associated therewith.</p>
Medford – 6	<p>Comment: Inadequate Mitigation Commitments at Wellington Circle</p> <p>Even under the revised mitigation strategy involving lane additions and signal optimization at Wellington Circle, numerous intersections are projected to operate worse under Mitigated Build conditions than under No-Build conditions, and may more worse than current. Furthermore, as GPI notes, the projected capacity benefits of proposed lane additions “...may be overstated as reported in the FEIR. These additional lanes will be added to an exceptionally wide roadway cross-section.” Even under the Proponent’s optimistic projections, the proposed mitigation strategy at Wellington Circle is inadequate. The City requests further commitment to a grade-separated roadway solution.</p> <p>Response: Section 2.2.6 of the SFEIR and the Proponent’s Surrounding Community Agreement with the City of Medford reiterate the Proponent’s commitment to contribute to the funding of a study of long-term mitigation options at Wellington Circle.</p>

Councilor Salvatore LaMattina

Boston – 1	<p>Comment: What we have is a traffic nightmare that will be guaranteed to only get worse and we have a company that has not been very forthcoming with us from the beginning of this process. Wynn expects the City to cover the full expense of a project that has many difficult challenges ahead in its</p>
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Councilor Salvatore LaMattina	
	<p>existing form, never mind in the years to come. They have not provided us with a capacity analysis or any documentation that would account for signal times and safe street crossings for pedestrians, bicyclists or the handicapped. For all its flaws, at least the DEIR has something.</p> <p>Response: See Section 2.2.7 for a discussion of the Proponent's proposed mitigation in Sullivan Square developed in consultation with MassDOT, the MBTA, and the BTB.</p>

City of Somerville Mayor – Joseph A. Curtatone	
Somerville – 1	<p>Comment: To build a larger parking facility, while assuming fewer patrons will choose to drive to the facility, raise concerns about the project's impact on the regional transportation network. Parking availability is a driver for mode choice. If it can be reasonably expected that parking will always be available, as it would be when approximately 3,000 parking spaces is cited as the normal operating capacity for parking and 3,700 parking spaces are being built (almost 25% more capacity than needed), than a patron can assume that parking will always be available. Therefore there is no incentive not to drive to the facility, let alone change FEIR input assumptions to reflect that 6% less patrons will now arrive by car.</p> <p>Response: The Proponent has committed to a robust TDM program to encourage and incentivize use of non-SOV modes. In addition, the Proponent has committed to monitor the success of that TDM program.</p>
Somerville – 2	<p>Comment: We continue to believe that the Proponent has not sufficiently considered the effect of AULs on certain activities including passive and active recreation. Somerville continues to believe that changes to development plan imposed by remediation would reduce the proposed public benefits, which, as currently planned, are far from adequate to offset the major exemptions that the proponent seeks from normal waterfront development requirements.</p> <p>Response: As discussed in Section 1.2.5.1, the planned remediation to be completed before opening of the Project will make the site safe for all proposed Project uses, including recreational use of the Project open spaces.</p>
Somerville – 3	<p>Comment: The FEIR indicates that in-situ Stabilization/Solidification (ISS) will be used to treat one of the portions of the property that abuts a portion of the river. While ISS is an accepted method for treating hazardous wastes, there have been concerns raised about the method as it relates to corrosion of the treated material and erosion related to water infiltration. In out comment related to ISS and to consider alternatives to ISS for this site.</p>

City of Somerville Mayor – Joseph A. Curtatone	
	<p>While the FEIR provides some detail on the use of ISS in the southern portion of the site, we feel that It does not adequately consider alternative remediation methods nor sufficiently outline criteria for its expectation to “expand on the extent of soil stabilization/ removal areas.” The proponent has not provided sufficiently detailed information relative to hazardous waste to demonstrate that any removal or remediation can be done in a manner that will not harm the waterway or surrounding communities over the long term.</p> <p>Response: The Phase III Remedial Action Plan (RAP) prepared for the Site included a full and detailed comparison of remedial action alternatives designed to achieve a Permanent Solution in accordance with the Massachusetts Contingency Plan. As a result of the Phase III analysis, ISS was chosen as the preferred alternative for the tip of the peninsula because it was deemed the best alternative with respect to the several criteria set forth in the Massachusetts Contingency Plan. The Proponent’s technical evaluations support the use of ISS in this portion of the Disposal Site as protective of nearby resources, including the Mystic River and surrounding communities, in both the short and long term.</p>
Somerville – 4	<p>Comment: The proponent has indicated that they believe the site can achieve a long term permanent solution. We believe that the FEIR has not provided sufficient information to demonstrate the feasibility that this can be done in a safe and environmentally responsible manner that maintains public benefits.</p> <p>Response: See responses to Somerville-2 and -3.</p>
Somerville – 5	<p>Comment: In a MEPA process meant to provide for the disclosure of information to the public about a project of regional significance, we remain concerned that this type of information may not be made available for some time to come.</p> <p>Response: The FEIR and SFEIR summarize the nature and extent of contamination at the Project Site, along with the proposed remediation. A substantial amount of additional information concerning the contamination and planned remediation at the Site can be obtained from reports filed and to be filed under the MCP that are publicly available from the Massachusetts Department of Environmental Protection.</p>

Boston Transportation Department	
BTD – 1	<p>Comment: Unfortunately we find that the FEIR does little to address the concerns we raised in comments on the Draft Environmental Impact Report (DEIR) filed for this project. Accordingly, we respectfully ask that the filing</p>

Boston Transportation Department	
	<p>of a Supplemental FEIR for this project be required. Our concerns relate primarily to the incompatibility of the proposed resort development with the City's plans for Sullivan Square and Rutherford Avenue and the FEIR's failure to address this issue. The City of Boston has just completed a three year long planning process defining improvements for Sullivan Square and Rutherford Avenue that are intended to enhance the urban environment with greater pedestrian connectivity and new land development opportunities. The anticipated \$100 million roadway improvement project will remove existing roadway grade separations that form a barrier for pedestrian and bicycle travel east-west across Sullivan Square and Rutherford Avenue. The applicant's proposal to draw another 12,000 vehicles per day through Sullivan Square is in direct conflict with the City's plan to deemphasize vehicular travel and promote alternative travel modes in this area. The applicant has failed to put forward any plan indicating how this conflict will be resolved. In fact, the FEIR fails to even analyze the projected future roadway conditions proposed by the city. Whereas the DEIR demonstrated that the added resort traffic would cause significant peak hour congestion in Sullivan Square and along Rutherford Avenue under proposed roadway conditions the FEIR only offers mitigation for the existing roadway system.</p> <p>Response: See Section 2.2.7 of the SFEIR for the Proponent's proposed mitigation for Sullivan Square developed in consultation with MassDOT, the MBTA, and the BTM which is consistent with the City's long-term plans for Sullivan Square.</p>
BTD – 2	<p>Comment: With regard to traffic mitigation "plans" that have been submitted for the existing roadway system we find these to be inadequate. In our comments on the DEIR we asked that plans be developed and submitted at a scale that would allow evaluation of the feasibility of the proposed improvements. The mitigation plans provided for Cambridge Street entering Sullivan Square were drawn on an aerial photograph with no information provided regarding proposed street dimensions and the availability of right-of-way to accommodate roadway widening. The operational analysis provided for the mitigation plan is limited to the Cambridge Steer/Maffa Way intersection with no analysis provided for the equally challenging Rutherford Avenue/Alford Street intersection. Also disturbing is the fact that the mitigation plans for Boston streets were developed without consulting the BTM. The BTM's first exposure to these plans occurred when the FEIR was filed.</p> <p>Response: See Response to BTD-1.</p>
BTD– 3	<p>Comment: Also, the City remains very concerned that the proposed roadway improvements at the main site driveway cannot be built as proposed and that even if they can be built that they will not provide</p>

Boston Transportation Department	
	<p>adequate capacity to serve project related travel demands causing significant peak hour traffic congestion on Alford Street in the City of Boston. The access plan proposes the addition of two left-turn lanes on Alford Street in Boston requiring land takings from at least two parcels located within the City of Boston. The applicant's own analysis shows that adequate vehicle storage capacity is not available on the Alford Street intersection approach to allow the two turn lanes to operate efficiently. Final design of these improvements are likely to show that required land takings in the City of Boston are more extensive than those shown on the applicant's plan. Not only must these takings be approved by the City of Boston but the takings may include land that is currently owned by the City.</p> <p>Response: Section 2.2.1 includes traffic analysis of Lower Broadway/Alford Street (Route 99) with proposed mitigation in place. Queue analysis was done using SimTraffic, a simulation-based analysis software, and shows that queues will not extend through upstream intersections. The Proponent believes it has control of all the necessary land to construct the proposed improvements. The Proponent looks forward to working with the City of Everett and the City of Boston during the design phase.</p>

Environment Department	
Boston - ED-1	<p>Comment: The FEIR does not include a construction management plan (CMP) that would help to address the issues raised in our DEIR comments. Given the very extensive site contamination and the plan to engage in concurrent remediation and construction, it is essential that details be provided about the ways in which adverse impacts in Boston will be avoided. The response is not satisfactory.</p> <p>Response: The Project is not yet at the stage where the requested construction details are available. Contaminated soils requiring off-site disposal will be characterized, handled and transported in full compliance with the MCP and other applicable local, state and federal regulations. During all remediation and excavation activities, both work-zone and perimeter real-time Particulate Matter (PM2.5) monitoring will be conducted to verify compliance with health standards.</p>
Boston - ED-2	<p>Comment: The information in Chapter 12 is not detailed and does not address our comment, which requested commitments to important and necessary measures. Surrounding communities should have the opportunity to evaluate and comment on mitigation measures proposed for the remediation and construction including, but not limited to, phasing,</p>

Environment Department	
	<p>overlapping activities, duration, vibration, noise and air quality.</p> <p>Response: See Section 1.2.5 for current information regarding remediation activities. With respect to MGL c. 21E, the Proponent will comply with the public involvement requirements set forth in the Massachusetts Contingency Plan. The Proponent intends to develop a detailed plan for communicating with interested parties regarding ongoing construction activities. In addition to on-site postings and signage, components of this plan will include, but not be limited to: (i) establishment of a project website which will include contact information as well as a location for input and feedback from the public, (ii) scheduling and advertising quarterly public information meetings and (iii) a subscription function for interested members of the public to leave contact information in order to receive project updates and notifications.</p>
Boston - ED-3	<p>Comment: The issue of General Conformity has apparently not been raised with the U.S. Army Corps of Engineers (ACOE). Surrounding communities should have been informed in the FEIR regarding discussions with ACOE.</p> <p>Response: General Conformity does not apply to the proposed Project that is subject to review by MEPA. The mesoscale air quality analysis demonstrates that the Project will not have an adverse impact on regional air quality and is compatible with the Massachusetts State Implementation Plan (SIP).</p>
Boston - ED - 4	<p>Comment: We continue to believe that a microscale analysis is in the best interest of residents in the project area.</p> <p>Response: A microscale analysis is not required by MassDEP.</p>
Boston - ED-5	<p>Comment: The Proponent has committed to an analysis to identify the avoided greenhouse gas (GHG) emissions associated with the proposed water shuttle. The analysis remains important despite the small expected increase in the water shuttle mode.</p> <p>Response: The Proponent was not required to provide the analysis described in Boston ED-5. However, to provide clarification, a water shuttle trip is more direct and involves a shorter travel distance than a motor vehicle trip for most patrons. The water shuttle, as a form of mass transit, carries many people on one trip and thus replaces many individual vehicle trips and the associated vehicle emissions. Given these benefits, mobile source emissions are expected to be slightly less by replacing individual motor vehicle trips with a shared trip on a water shuttle.</p>
Boston - ED-6	<p>Comment: IECC 2012 is now in effect and while not required due to timing, it provides for a higher level of energy efficiency and safety.</p>

Environment Department	
	Response: The Project will comply with all building codes in effect at the time construction starts.
Boston - ED-7	<p>Comment: A GHG analysis for construction equipment would provide valuable information about how to minimize the impact of construction on air quality.</p> <p>Response: The MEPA GHG Policy does not require a construction GHG analysis. Construction activities will fully comply with all DEP regulations to prevent off-site air quality impacts.</p>
Boston - ED-8	<p>Comment: While the rate of sea level rise over time is subject to some debate, local and regional projections are considered reliable and should not be dismissed.</p> <p>Response: The Proponent has utilized published local and regional projections in connection with evaluations for the DEIR and FEIR, including the Boston Society of Architects study on best practices for climate change adaptation and resilience (Building Resilience in Boston, July 2013) as well as the Boston Harbor Association publication (Preparing for the Rising Tide, February 2013) in its plans for addressing climate change on the Project Site.</p>
Boston - ED-9	<p>Comment: We believe that ongoing, permanent TDM monitoring is the only way to ensure that a TDM program is capturing the maximum number of users.</p> <p>Response: An updated description of the proposed monitoring program is provided in Section 2.7.</p>
Boston-ED-10	<p>Comment: The Proponent has not provided verification from Mass DEP that a 91-year lapse between dredging activities allows for the activity to be identified as "maintenance" dredging.</p> <p>Response: DEP's comment letter on the FEIR indicates it has determined that the proposed navigation channel maintenance dredging complies with the standards for dredging and dredge material disposal.</p>

Boston Parks and Recreation Department

Boston-BPR- 1	<p>Comment: The following issues were presented in the comment letter on the DEIR from this Department dated February 11, 2012. While brief responses were provided in the FEIR, it is the opinion of this Department that the resolution of these matters requires further analysis and mitigation.</p>
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Boston Parks and Recreation Department	
	<ul style="list-style-type: none"> • Inclusion of the build out of the Article 80 parcels freed by the realignment of Sullivan Square; • Congestion in the vicinity of the parks, and a “hotspot” analysis of compromised intersections; • Increased vehicular, MBTA and tour bus traffic volume on pedestrian access to the parks; • Increased vehicular, MBTA and tour bus traffic on the air quality around the parks. • Connection to the current planning processes underway for Ryan Playground and Sullivan Square; • In addition to the issues above, this Department recommends that any open space provided on the Wynn site should be permanently protected in perpetuity through the Chapter 91 License. <p>Response: The Proponent looks forward to working with the City of Boston regarding its long-term plans for Sullivan Square and the Disposition Parcels.</p>
Boston-BPR- 2	<p>Comment: The seven parcels that will be freed for redevelopment by the realignment of Sullivan Square were conceptualized through a recent BRA planning effort. The proposed building footprints, number of floors and uses were vetted through a public process to create estimates that are included in the Sullivan Square Disposition Study (12/2013). This build out should be considered as part of the Wynn analysis.</p> <p>Response: The BRA’s Disposition Study did not provide any traffic analysis of the proposed developments. All parcels are presumed to be Transit-Oriented Development (TOD), and therefore will have relatively low generation of new trips. These projected trips are accounted for in the background growth rate.</p>
Boston-BPR-3	<p>Comment: This Department recommends that the proposed Wynn development should integrate Ryan playground into its planning and development processes. Ryan Playground is an active recreation area and efforts should be made to ensure that the Wynn development does not detract, and rather enhances the pedestrian, bicycle and vehicular access to that park. Also, there should be no negative impacts to the parking available at Ryan Playground.</p> <p>Response: The Project is not impacting Ryan Playground. Access to Ryan Playground, including pedestrian and bicycle access, will remain as it currently is. The Project will not change the number of available parking spaces at Ryan Playground.</p>
Boston-BPR-4	<p>Comment: Ryan Playground is an active recreational area that generates a vehicular, bicycle and pedestrian traffic. The vehicular traffic generated by Ryan Playground should be included in the Wynn analysis, and the</p>

Boston Parks and Recreation Department	
	<p>impacts of the Wynn development on the congestion and access to the park should be mitigated.</p> <p>Response: Ryan Playground is included in the traffic analysis because it was open and operational as an existing use when the Project's traffic count data were collected.</p>
Boston-BPR-5	<p>Comment: Further, the proposed Wynn development should be assessed for potential connections to the pedestrian environment, parks and greenway that will be developed in the vicinity of Sullivan Square through the disposition of land from the traffic realignment. These parks and pedestrian ways will be developed by the Article 80 process, as part of the BRA's redevelopment of the intersections around Sullivan Square.</p> <p>Response: The Proponent looks forward to working with the City of Boston on the long-term plan for Sullivan Square, including planned new open space facilities.</p>
Boston-BPR-6	<p>Comment: In addition, this department is concerned about the permanent protection of open space proposed in the FEIR, and requests that the Chapter 91 license process ensure that all open space that is provided within the tidelands be permanently protected in perpetuity through language in the Chapter 91 License, Master Deed, conservation restrictions, conveyance to a non-profit or government entity, or other mechanisms.</p> <p>Response: The Proponent will work with the DCR, DEP and the City of Everett through the Chapter 91 License process to ensure that on-site public open space and enhancements to other off-site public open space are fully in compliance with Chapter 91. See Section 1.2.7.2.</p>
Boston-BPR-7	<p>Comment: This Department would like to recommend that any community benefits that are negotiated for the development should consider the mitigation of impacts to Ryan Playground, and the proposed improvements to Sullivan Square as appropriate.</p> <p>Response: The Proponent is continuing discussions with the City of Boston to address impacts and improvements to Sullivan Square.</p>

City of Medford Office of Community Development

Medford-CD – 1	<p>Comment: The FEIR has adjusted for the earlier failure to properly account for traffic during the build condition at the intersection of Route 93 and Mystic Valley Parkway. Current and Build scenario impacts are proposed to be mitigated by signal timing changes. The proposed timing changes</p>
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City of Medford Office of Community Development	
	<p>will favor exiting Route 93 traffic but will still cause significant delays and likely backup to Route 92. The signal time will further exacerbate anticipated problems from Harvard Street to Mystic Valley Parkway. The Proponent fails to acknowledge the deleterious effects on the South Medford neighborhood and Mystic Avenue business area. These issues must be addressed prior to occupancy.</p> <p>Response: The Proponent has proposed signal timing changes that accommodate the future traffic at this location. The Proponent has committed to perform a Road Safety Audit (RSA) at this location.</p>
Medford-CD – 2	<p>Comment: Of continued concern is the exacerbation of traffic and safety issues at Wellington Circle. Proposed Mitigation includes geometric improvements and signal timing improvements. The creation of additional lanes at Wellington Circle is ill conceived. This area is already extremely difficult to navigate and unsafe. The plan continues to neglect pedestrian safety in this area. The below grade separated roadway must be advanced prior to occupancy of this project.</p> <p>Response: Section 2.2.6 reiterates the Proponent's commitment to participate in the design process for the long-term reconstruction of Wellington Circle. In the meantime, Section 2.2.6 also outlines improvements to Wellington Circle that will mitigate the Project's impact on the intersection.</p>
Medford-CD – 3	<p>Comment: The proposal by the Proponent to utilize up to 1,000 off-site parking spaces for employees was first raised in the DEIR. The FEIR does not adequately address that traffic impacts to the Wellington Circle Area. The FEIR also does not assure that existing MBTA Park and Ride Spaces will not be replaced with employee parking. This is of particular concern due to the delayed extension of the Green Line to Medford and the proposal of the MBTA to offset impacts by the creation of Park and Ride Spaces in Beverly and Salem. Air Quality in Medford should not deteriorate due to the delay in the implementation of necessary transportation improvements or the addition unnecessary vehicles for employees who have traveled to the area by vehicle.</p> <p>Response: The FEIR analysis did account for employee trips and Project shuttle trips to the Station Landing garage, where the Proponent anticipates leasing approximately 300 spaces for employee parking. See Section 2.2.6 of the SFEIR for revised and updated analysis of Project traffic impacts and mitigation proposed, in consultation with MassDOT, which will effectively mitigate Project impacts. The Proponent has also committed to provide up to \$1.5 million for a study of long-term alternatives at Wellington Circle.</p>
Medford-CD –	<p>Comment: The city requests that the Proponent be responsible for additional mitigation at the noted intersections, provide long term</p>

City of Medford Office of Community Development

4	<p>monitoring of intersections within the City by an independent party, and fund the construction of any improvements necessary to offset any unforeseen impacts.</p> <p>Response: The Proponent has committed to construct improvements to mitigate its impacts at Wellington Circle and contribute to the long-term study at Wellington Circle. The Proponent will include Wellington Circle in its monitoring program, as outlined in Section 2.7.</p>
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Charlestown Preservation Society Design Review Committee

CPSDRC- 1	<p>Comment: The 2014 FEIR assumes that the long planned roadway reconfiguration designed to serve the development of a new pedestrian friendly smart growth community in Sullivan Square will not be implemented by the time the Wynn Casino is opened. In accordance with an EOEEA request, we have been told, the drawings and analysis in the earlier DEIR that included the Sullivan Square redesign were dropped from the FEIR. The FEIR now retains the existing traffic rotary in all its traffic projections, a completely unsatisfactory solution to Charlestown's traffic problems.</p> <p>Response: See Section 2.2.7 of the SFEIR for the Proponent's proposed mitigation for Sullivan Square developed in consultation with MassDOT, the MBTA, and the BTD which is consistent with the City's long-term plans for Sullivan Square.</p>
CPSDRC - 2	<p>Comment: The FEIR does not show a capacity analysis included a Level of Service rating for the Rutherford Avenue and Main Street intersections at the rotary, though these, we have been told by the proponent's traffic consultant, would operate at level of service "F". This means that they will cause significant delays, congestion, and environmental degradation on Rutherford Avenue and Main Street leading into the traffic rotary.</p> <p>Response: The Proponent is not adding any traffic to the Rutherford Avenue or Main Street eastbound approaches to the rotary. Synchro does not have the capability to analyze a rotary that has a combination of signalized and unsignalized entry points. The VISSIM analysis, summarized in Appendix B, accounts for Rutherford Avenue and Main Street. Those approaches will continue to operate poorly in the Build Mitigated condition, as they do today.</p>
CPSDRC - 3	<p>Comment: The FEIR does not propose any solution to these traffic problems. But the DEIR did by designing a grid of streets to disperse traffic. We believe that the problems can be resolved by integrating the proposed Cambridge Street/ Maffa Way mitigation with the construction of the City's</p>

Charlestown Preservation Society Design Review Committee	
	<p>Sullivan Square area redesign plans as shown. In the DEIR (Fig. 4-81) these intersections (53c & 53 d) in the 2023 Build Peak Hour capacity analysis were rated C and E respectively for Friday P.M. Therefore they are rated acceptable in the redesign plan.</p> <p>Response: See Section 2.2.7 of the SFEIR for the Proponent's proposed mitigation for Sullivan Square developed in consultation with MassDOT, the MBTA, and BTD which is consistent with the City's long-term plans for Sullivan Square.</p>
CPSDRC – 4	<p>Comment: The FEIR does not include any documentation that we can find that accounts for signal times for safe street crossings for pedestrians, physically handicapped individuals, and bicycle traffic. Therefore, it is unclear to us whether pedestrian crossing movements through Sullivan Square are accounted for and, if they are not, what their inclusion in a pedestrian friendly environment would mean to the intersection capacity ratings presented.</p> <p>Response: See Section 2.2.7 of the SFEIR for the Proponent's proposed mitigation for Sullivan Square developed in consultation with MassDOT, the MBTA, and BTD which is consistent with the City's long-term plans for Sullivan Square. Concurrent pedestrian phasing is included in proposed traffic signal phases at the intersections of Cambridge Street/I-93 Ramps, Cambridge Street/Spice Street, and Cambridge Street/Maffa Way/Alford Street. Concurrent pedestrian phasing, where possible, is beneficial to both pedestrians, because they do not need to wait a full cycle for an all-pedestrian phase, and to all users by shortening the required cycle length.</p>
CPSDRC – 5	<p>Comment: The "Traffic Volumes" diagrams (figures 4-120 through 4-142) do not properly show traffic in the current underpasses under the traffic rotary. Howard Stein Hudson released a new Volume Comparison diagram with the underpass information today, August 4. These changed numbers appear to be reduced as well as reassigned in the new diagram. This diagram requires further explanation and analysis.</p> <p>Response: Updated volume diagrams for the Sullivan Square rotary and underpass are provided in Section 2.2.7.</p>
CPSDRC – 6	<p>Comment: We note that the retaining the traffic rotary and the underpass is inconsistent with the City of Boston's Rutherford Avenue/Sullivan Square plans. This will significantly and adversely affect the City of Boston.</p> <p>Response: See Section 2.2.7 of the SFEIR for the Proponent's proposed mitigation for Sullivan Square developed in consultation with MassDOT, the MBTA, and BTD which is consistent with the City's long-term plans for Sullivan Square.</p>

Charlestown Preservation Society Design Review Committee	
CPSDRC – 7	<p>Comment: We believe that the proposed traffic mitigation is insufficient because the Main Street and Rutherford Avenue traffic approaching the rotary from the south will not work. Personal experience tells us that the merging traffic from each of these two streets has to wait for a break in the traffic released at the Maffa Way and Cambridge Street traffic signals. Therefore, at peaks traffic times, Rutherford Avenue and Main Street vehicles will be held up trying to merge into the rotary. Note: you can see the Rutherford Avenue backup in the second (mitigated) video simulation in the MGC 20 June 2014 meeting included in the MGC “You Tube” archive.</p> <p>Response: See Section 2.2.7 of the SFEIR for the Proponent’s proposed mitigation for Sullivan Square developed in consultation with MassDOT, the MBTA, and BTD which is consistent with the City’s long-term plans for Sullivan Square. The VISSIM analysis of Sullivan Square, summarized in Appendix B, includes the analysis of Rutherford Avenue and Main Street. As shown in the summary, in the Future Build with Mitigation condition, there is little change in the delay and queuing on either approach.</p>
CPSDRC – 8	<p>Comment: In response to a comment by the Charlestown Neighborhood Council, the FEIR (page15-139) says that “The Proponent is committed to working with the neighborhood and the City of Boston to mitigate potential traffic impacts and will participate in the development of plans to improve Sullivan Square”. If the Proponent is truly committed to this, why has he altered the DEIR so that the FEIR makes no recognition of the plans for the Sullivan Square area redesign which have been honed by the City and the neighborhood in a multi-year process? On the contrary, this change indicates that this statement by the Proponent is not in good faith and that its expressed commitment cannot be expected to be sincere or effective.</p> <p>Response: See Section 2.2.7 of the SFEIR for the Proponent’s proposed mitigation for Sullivan Square developed in consultation with MassDOT, the MBTA, and BTD which is consistent with the City’s long-term plans for Sullivan Square.</p>

Charlestown Waterfront Coalition	
CWC – 1	<p>Comment: CWC has serious concerns about the Wynn Massachusetts FEIR, particularly in three areas: the absence of detailed plans for site remediation and construction management, and in regard to insufficient traffic analysis. Remediation and build activities will seriously impact Charlestown and air quality, noise and traffic flows, as excavation materials must go out of state, and supplies and materials must come in from disparate sources, many presumably at Rt. 93.</p>

Charlestown Waterfront Coalition	
	<p>Response: As described in Section 1.2.5, and as required by the Massachusetts Contingency Plan, applicable plans (either a Phase IV Remedy Implementation Plan (RIP) or Release Abatement Measure (RAM) plans) will be filed prior to the initiation of remediation activities. During construction, the Proponent will continue to manage soil and groundwater contamination in accordance with the provisions of the MCP. Related MCP submittals will provide detailed information regarding the excavation, disturbance and handling of impacted environmental media; the transport and off-site disposal of impacted soil; and provisions to control exposures to both on-site personnel and nearby receptors.</p>
CWC – 2	<p>Comment: The FEIR states “Information regarding construction conditions and impact mitigation will be distributed to project site abutters,; but not to Charlestown. In addition, there will no public participation process under Chapter 21 E, unlike Charlestown’s experience with Harborview Apartments’ clean up of Parcel 4, and Spaulding Rehabilitation Hospital’s clean up of parcel 6, both in Charlestown Navy Yard. Spaulding’s clean up also took 6 months, requiring constant truck traffic on Chelsea Street. CWC believes the absence of a public process is a major shortcoming in the FEIR and illustrates graphically Wynn’s failure to recognize his responsibility to this surrounding community.</p> <p>Response: See responses to Boston ED-2 and CWC-1. In addition to the outreach measures described in Section 12.2.1 of the FEIR, the Proponent will develop a detailed public outreach program which will include a Project website, quarterly public information meetings, a subscription page for Project notifications, and other established outreach methods.</p>
CWC – 3	<p>Comment: Curiously, the FEIR recognizes that increased noise of approximately 3 decibels during construction will impact Charlestown, but the FEIR has no acknowledgement of that prevailing wind in the area is out of the northwest, and that particulates will be air born over the Mystic River and into Charlestown, affecting air and water quality. In addition, there is no discussion on trucking or Mystic River based barge routes to be taken to transport soil from the site to accredited disposal sites.</p> <p>Response: With respect to potential construction noise impacts, Section 12.2.5 of the FEIR documented that the loudest phase of construction at the Project Site is expected to produce sound levels (on a dBA scale) in neighboring areas of Somerville and Charlestown that are comparable to residential areas at night, and lower than typical urban background sounds (such as from roadway traffic). The distances between the Project construction and these receptors will provide sufficient attenuation so that construction noise will not adversely affect these neighborhoods. In addition, construction work will comply with MassDEP Noise Control</p>

Charlestown Waterfront Coalition	
	Regulations, 310 CMR 7.10, and City of Everett ordinances, and will use noise mitigation measures such as barriers, enclosures, equipment mufflers, and quieter construction equipment alternatives and techniques where feasible. With respect to transport of soil from the Site to disposal facilities, soils requiring off-site disposal will be characterized, handled and transported in full compliance with the MCP and other applicable local, State, and federal regulations to ensure there are no off-site air quality impacts.
CWC – 4	<p>Comment: The FEIR storm water quality analysis states only “storm water runoff will be carefully managed during construction in accordance with state and federal regulations.” There is no discussion of how the dredging for the marina or the remediation removal will impact Mystic River water quality.</p> <p>Response: All dredging will be performed in accordance with applicable local, state and federal requirements. Dredging associated with both the navigation channel and the sediment remediation will be conducted utilizing a crane on a floating barge. The crane will use an “environmental type” clam shell bucket for dredging the sediment, with rubber seals and overlapping sides to minimize the quantity of sediment that will flow back into the water column when the dredged sediment is conveyed into the accompanying collection scow. In addition, silt curtains will be used to further reduce potential impacts.</p>
CWC – 5	<p>Comment: And finally, the air quality analysis comes up equally short. The FEIR states, “the air quality impacts from the operation of the project subsequent to completion of construction will be limited to operational emissions” for generating heat and hot water. It states further that “increased vehicular traffic volume will slightly increase regional emissions of motor pollutants” due to project mitigation of impacts with improved signalization and an aggressive TDM program. Any analysis of remediation and construction impact on air quality is missing.</p> <p>Response: Contaminated soils requiring off-site disposal will be characterized, handled and transported in full compliance with the MCP and other applicable local, state, and federal regulations. During all remediation and excavation activities, both work-zone and perimeter real-time Particulate Matter (PM2.5) monitoring will be conducted to verify compliance with health standards. Construction activities will fully comply with all DEP regulations to prevent off-site air quality impacts.</p>
CWC – 6	Comment: CWC considers the absence of air and water quality analysis on remediation strategies and construction management to be a critical shortcoming. Charlestown and the river are south east of the Monsanto site and with the prevailing wind coming out of the northwest, will be the recipient of air born releases. CWC requests that the Secretary with hold

Charlestown Waterfront Coalition	
	<p>the award of a certificate, and require Wynn to submit a supplemental EIR with a detailed analysis of air and water quality during marina & shore restoration activities, and remediation and construction.</p> <p>Response: As required by the Massachusetts Contingency Plan, applicable plans (either a Phase IV Remedy Implementation Plan (RIP) or Release Abatement Measure (RAM) Plans) will be filed prior to the initiation of remediation activities. Further, during construction, the Proponent will continue to manage soil and groundwater contamination in accordance with the provisions of the MCP. Related MCP submittals will provide detailed information regarding the excavation, disturbance and handling of impacted environmental media; the transport and off-site disposal of impacted soil; and provisions to control exposures - including dust exposures - to both on-site personnel and nearby receptors.</p>

DDR Corp.	
DDRC – 1	<p>Comment: Overall comment- the traffic analysis only reports anticipated operations at the two (2) signalized intersections located along the circle. These signalized intersections are projected to operate are a Level of Service B with the implementation of the eastbound flyover. However, there was no supplemental analysis of all the unsignalized approaches to the circle (Mystic View Road, Frontage Road and Santilli Highway) and by not doing so, it does NOT reflect reality whereby the effects of operations for the entire circle is still unknown.</p> <p>Response: An updated evaluation of Santilli Circle can be found in Section 2.2.2 of the SFEIR.</p>
DDRC – 2	<p>Comment: Mystic View Road – when looking at the east signal at the circle, it is projected that northbound queues on the circle will be approximately 200 feet (Friday and Sat. peak hours) and it will back up to the merge area with Mystic View Road. Since this was not evaluated, this condition is a great concern to us where it could create unacceptable delays and severely impact the maneuverability of vehicles. In addition, the effect of our main Gateway Center access drive with Mystic View Road also needs to be studied due to this snow ball effect along the circle where backups will be commonplace.</p> <p>Response: See Response to DDRC-1.</p>
DDRC – 3	<p>Comment: Frontage Road – even though the approach of Frontage Road to the circle will be widened to two lanes, no evaluation was done to see if this really will work efficiently without a traffic signal, especially due to the</p>

DDR Corp.	
	close proximity of Santilli Highway. Response: See Response to DDRC-1.
DDRC – 4	Comment: Santilli Highway – at the west signal along the circle, queues will routinely block Santilli Highway and will extend back to the Frontage Road intersection. Again, no analysis was done with respect to this condition and the subsequent impact it will have on the overall operation of the circle. There are very high traffic volumes on the traffic circle and coming from Santilli Highway, and there is no evidence presented that these volumes can be accommodated in the very short merge area between Santilli Highway and Mystic Valley parkway (westbound). Due to the 1,400 vehicles projected to enter Mystic Valley Parkway westbound at this location, it puts into serious question the capacity of the on-ramp to handle this significant volume of traffic. Response: See Response to DDRC-1.

Mystic River Watershed Association	
MyRWA – 1	Comment: While we celebrate the innovative changes described above, MyRWA reiterates its recommendation the developer support a canoe/kayak program at this location providing direct access for the general public to the boat basin that is being created. Such a facility would provide rare access to the water sheet to residents who may have no other way to actively engage the river for recreation. This low cost concept has the potential to benefit many residents in this area. Response: The Proponent has concerns regarding the potential conflicts between ferry vessels and low profile watercraft like canoes and kayaks in the area of the Project docks and gangways, and it fully supports locating canoe/kayak landing sites above the dam within the DCR Gateway Park.

The Boston Harbor Association	
TBHA – 1	Comment: <u>Change in proportion of uses:</u> Similar to our comments on the Draft impact Report, we note a continuing shift in the proportion of uses outline in the FEIR, specifically a further 14.7% increase in the gaming area (also a justification for more parking), a 12% increase in food/beverage space. It is not clear whether the change in uses will affect the modal split of users, i.e., individuals who come to the gaming area may/may not travel to the site by transit versus private automobile in the same ratio as families and others who may primarily be going to the project's restaurants and

The Boston Harbor Association	
	<p>cafes. We ask the proponent look at this further.</p> <p>Response: Section 2.1 of the SFEIR presents an updated trip generation analysis and associated mode share goals for the Project design as refined. The Project's mode share percentage projections and goals, which have been reviewed with MassDOT, have remained unchanged and are not affected by the number of gaming positions. Further, the Project remains committed to a robust TDM program, referenced in Section 2.6 of the SFEIR and outlined in detail in Section 4.16 of the FEIR that will encourage alternative mode travel by all categories of Project patrons.</p>
TBHA – 2	<p>Comment: <u>Proposed reliance on automobiles</u>: As noted in both the Draft and Final EIRs extensive challenges for the regional road system in and around the site as a result of the project. Additional vehicles from the proposed project will further exacerbate the situation. The Secretary's 21 February 2014 Certificate on the Draft Environmental Impact Report was specific about avoiding, minimizing, and mitigating vehicle emissions "to the maximum extent feasible through establishment of aggressive mode share goals supported by investments in transit infrastructure and strong user incentives..."(page 28 of Certificate), implementing Transportation Demand Management measures "designs to ensure patrons and employees use transit to the greatest degree possible"(page 31), and encouraging the proponent "to reduce the amount of proposed parking to further reduce impervious surfaces and support aggressive mode share goals" (page 32 of Certificate).</p> <p>Response: No response required.</p>
TBHA – 3	<p>Comment: Given the consistent language within the Secretary's Certificate, we were very surprised at the addition 791 parking spaces proposed in the Final Environmental Impact Report. According to the FEIR, "While employees will still be required to park off-site, since filing the DEIR, the Proponent has identified a need to provide addition on-site parking spaces to better accommodate patrons and support additional gaming positions"(page 1-4 of FEIR). The addition of nearly 800 parking spaces to the project is counter to the Secretary's Certificate and the Scope of the FEIR. Consistent with its scope, we ask that the Secretary's Certificate for the FEIR require the proponent to reduce the number of parking spaces to less than the 2,909 parking spaces noted in the Draft EIR.</p> <p>Response: See Section 2.3 for the Proponent's revised and updated parking evaluation.</p>
TBHA – 4	<p>Comment: The FEIR notes that the water shuttle service will operate between the project site, Downtown Boston (Long or Rowes Wharf), and South Boston (World Trade Center). We ask that the Secretary's Certificate require a minimum of at least four geographic areas to be served, and that</p>

The Boston Harbor Association	
	<p>Chapter 91 License application process be used to finalize the actual locations. During the Chapter 91 License application process, it may become apparent, for example, the ridership would improve with stops at the Fan Pier (rather than the World Trade Center) and at the Charlestown Navy Yard.</p> <p>Response: The proposed water shuttle service is designed to respond to potential demand associated with the Project with the potential for expansion if warranted.</p>
TBHA – 5	<p>Comment: It is still not clear how the connection from the HarborWalk to the front of the building and to the public rest rooms can safely be accessed by the general public. It appears that the public may have to cross four lanes of roadway/ While those who drive to the site can enter the building from elevators from the underground parking, it is not clear how those who are walking along the HarborWalk and/or enjoying the public open spaces or coming from the boat dock can safely cross to the entrance of the building.</p> <p>Response: The Project design includes a fully accessible pedestrian connection between the Harborwalk and the main project entrance. Crossings of vehicle drop off areas will be appropriately marked as crosswalks to ensure pedestrian safety.</p>
TBHA – 6	<p>Comment: The Boston Harbor Association strongly supports these significant, creative environmental restoration efforts. We ask that the Secretary's Certificate require the completion of these efforts by the issuance of the first certificate of occupancy.</p> <p>Response: The Proponent expects to complete these activities prior to opening the Project.</p>

Federal Realty Investment Trust	
FRIT – 1	<p>Comment: Clean up of the contaminated sediments. What is the plan to prevent contaminants from impacting DCR's Draw7 Park and Baxter State Park?</p> <p>Response: As described in Section 1.2.5, and as required by the Massachusetts Contingency Plan, applicable plans for the dredging of sediment will be filed prior to the initiation of remediation activities. The Proponent will conduct these remediation activities in compliance with applicable laws and regulations including the MCP, and including requirements to mitigate impacts.</p>

Federal Realty Investment Trust	
	<p>Sediment dredging will be conducted utilizing a crane on a floating barge. The crane will use an "environmental type" clam shell bucket for dredging the sediment, with rubber seals and overlapping sides to minimize the quantity of sediment that will flow back into the water column when the dredged sediment is conveyed into the accompanying collection scow. In addition, silt curtains will be used to further reduce potential impacts. As a result, no adverse impacts are anticipated at the Draw 7 Park across the Mystic River from the Project. With respect to Baxter Park, Proponent notes that this area is upstream of the Amelia Earhart Dam, and therefore could not be impacted by sediment migration from the Project Site in any case.</p>
FRIT – 2	<p>Comment: Traffic in Sullivan Square. What is the plan for improving Sullivan Square, which has a LOS of F and no mitigation despite the high volume of casino traffic that will be added to failing intersection?</p> <p>Response: See Section 2.2.7 of the SFEIR for the Proponent's proposed mitigation for Sullivan Square developed in consultation with MassDOT, the MBTA, and BTB which is consistent with the City's long-term plans for Sullivan Square.</p>
FRIT – 3	<p>Comment: A supplemental filing should be required providing a thorough plan for cleanup of both upland areas and sediments, including the means and methods that will be used during construction and remediation to ensure public safety and public health.</p> <p>Response: As required by the Massachusetts Contingency Plan, applicable plans (either a Phase IV Remedy Implementation Plan (RIP) or Release Abatement Measure (RAM) Plans) will be filed prior to the initiation of remediation activities. Further, during construction, the Proponent will continue to manage soil and groundwater contamination in accordance with the provisions of the MCP. Related MCP submittals will provide detailed information regarding the excavation, disturbance and handling of impacted environmental media; the transport and off-site disposal of impacted soil; and provisions to control exposures - including dust exposures - to both on-site personnel and nearby receptors.</p>
FRIT – 4	<p>Comment: The Wynn Everett Casino FEIR does not include analysis of traffic impacts on the Rutherford Avenue/ Sullivan Square redesign and fails to recognize the casino traffic will seek out alternative routes on Main, Bunker Hill, Medford and Chelsea streets. Without a comprehensive traffic study and a viable mitigation plan, casino-related traffic will overwhelm Sullivan Square, creating congestion and gridlock with severe consequences for the regional economy, quality of life and the health of local residents.</p> <p>Response: See response to FRIT-2.</p>

Fort Hill	
FH – 1	<p>Comment: There was no consideration for rental cars, or any study indicating that 33% of people in this area utilize water transportation when convenient.</p> <p>Response: Rental cars are included in the general automobile number of trips generated by the Project. The Proponent has assumed that 6% of patrons and 3% of employees will use the proposed water shuttle service, not 33%.</p>
FH – 2	<p>Comment: There was no chapter 16 included in the FEIR submission. The proponent should be required to implement all mitigation prior to opening, otherwise, impacts unfairly burdens all of the adjacent land owners with excessive delays.</p> <p>Response: The Proponent is committed to implementing all mitigation prior to opening, as detailed in Chapter 3.</p>
FH – 3	<p>Comment: In addition, the city of Boston has now reached a consensus on an alternative for Sullivan Square. The proponent is still suggesting the implementation of minor mitigation prior to the city's plan being implemented. However, the traffic impacts from the project related trips appear to have been accommodated within the scope of the proponent's mitigation suggestion.</p> <p>Response: No response needed.</p>
FH – 4	<p>Comment: Many of the proposed improvements involve changes to signal phasing and timing. For a significant number of intersections, this appears to mean increasing time given to the main road such as Broadway and Route 16, and decreasing the time allotted for the side streets entering the roadways. This results in lower overall LOS and delay for the intersection, but often means significant increases in delay and worse LOS for the side streets. This will make it more difficult for traffic to exit the neighboring properties. Access to and from adjacent property should be maintained.</p> <p>Response: The Proponent will continue to work with the appropriate jurisdictions regarding the final design and implementation of signal timing improvements to optimize relevant traffic movements.</p>

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Stantec –1	<p>Comment: Section 4.1.1 mentions two shuttle routes proposed between the site and Orange Line stations north of the site at Wellington Circle and Malden Center. Given that resort patrons using transit riders will generally</p>
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Stantec Consulting Services, Inc.	
	<p>originate on the transit system south of the site it would make more sense to offer shuttle services at Sullivan Square Station. If this is not feasible the reasons why should be explained.</p> <p>Response: Shuttles to Sullivan Square station would be redundant since three MBTA buses (#104, #105, #109) run from Sullivan Square along Broadway (Route 99). Sullivan Square is also an extremely busy MBTA bus hub, and it is unlikely that a suitable shuttle bus berth would be identified at Sullivan Square station. The Proponent has consulted with the MBTA since filing the FEIR in order to identify suitable locations for shuttle service. Section 2.4.3 provides more detail regarding the Proponent's proposed shuttle operations.</p>
Stantec -2	<p>Comment: Service vehicle access for the resort is proposed by way of a new service road to be constructed connecting the project site to Broadway in Everett at Beacham Street. However, the applicant does not control the property that the road would be built on. A proper traffic analysis would assign all service vehicles to the proposed main site driveway and not assume completion of the service road. Likewise, the main site driveway should be assumed to be located at Horizon Way as the applicant does not control land that it proposes to purchase from the MBTA that would allow construction of the main driveway at the preferred location. The FEIR provides no analysis of the "alternative" main site driveway intersection with Broadway and Alford Street in Boston.</p> <p>Response: As described in Section 1.2.3, all of the acquisitions necessary to construct the site vehicular access described therein will be completed, and the site vehicular access will be constructed, prior to the Project opening.</p>
Stantec -3	<p>Comment: While it is appropriate for the project to set lofty goals for the use of alternative modes, the TDM program described later in the report does not include any consequences for the applicant associated with not meeting these goals. Given the uniqueness of this use the level of uncertainty regarding the traffic forecasts, and the level of existing traffic congestion in the site vicinity, a penalty component should be a part of the TDM plan.</p> <p>Response: The Proponent's TDM plan was outlined in Section 4.16 of the FEIR and has been approved by MassDOT. Additionally, the Proponent has agreed to all conditions set forth by the Massachusetts Gaming Commission when it awarded Wynn with the Region A casino license; one of these conditions includes a penalty for every additional Project trip above the number of trips projected in traffic and mitigation analyses traveling through Sullivan Square.</p>

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Stantec –4	<p>Comment: The FEIR increases the estimated resort travel share by way of the proposed water shuttle to six percent relative to the proposed three percent offered in the DEIR. The BTM supports efforts to provide water transportation as an alternative travel mode in the City and encourages the applicant to move forward with this element of the program however, in order to provide a realistic vehicular traffic analysis the change to six percent mode share is inappropriate.</p> <p>Response: Wynn’s mode splits were developed in consultation with MassDOT. The Proponent is required to monitor to meet TDM goals for the Project, as outlined in Section 2.7.</p>
Stantec –5	<p>Comment: Independent of the applicant’s repeated statements in the FEIR that the site is ideally situated from a transit perspective, the reality is that it is not within a comfortable walking distance of a fixed rail transit line. In the case of the Sugarhouse casino in Philadelphia, a comparable resort in many respects, light rail transit service is offered to the front door of the casino. In spite of this, the transit share for patron access at this resort is less than ten percent.</p> <p>Response: See Section 2.4 of the SFEIR for a discussion of the public and private transit connections to the Project.</p>
Stantec –6	<p>Comment: The FEIR notes that Level of Service E and F operating conditions along Lower Broadway in Everett forecasted in the DEIR are no longer anticipated. No explanation is given as to how this alternative conclusion was reached.</p> <p>Response: See Section 2.2.1 of the SFEIR.</p>
Stantec –7	<p>Comment: New mitigation is proposed for Sullivan Square. The improvements have not been reviewed with the BTM and the graphics provided do not include sufficient information to determine if the proposed improvements can be constructed within the existing right-of-way. Regardless, these improvements, if feasible, should be considered interim improvements as the City has a plan to upgrade Sullivan Square which the applicant has not adequately addressed in the FEIR. The applicant has yet to show how the proposed development project is compatible with the transportation system changes proposed by the City in Sullivan Square.</p> <p>Response: See Section 2.2.7 of the SFEIR for the Proponent’s proposed mitigation for Sullivan Square developed in consultation with MassDOT, the MBTA, and BTM which is consistent with the City’s long-term plans for Sullivan Square.</p>
Stantec –8	<p>Comment: The applicant indicated that no mitigation is required along Rutherford Avenue yet the existing conditions analysis shows certain</p>

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	<p>movements at intersections along Rutherford Avenue operating at LOS E or F and it is assumed that 15 percent of the project traffic will use this corridor. Again, the applicant does not propose mitigation relative to the City plan for Rutherford Avenue. The DEIR analysis indicated that the anticipated traffic increases on Rutherford Avenue associated with the proposed development project are not compatible with the City's plan for the corridor.</p> <p>Response: See Response to Stantec-7.</p>
Stantec -9	<p>Comment: The City commented on the DEIR indicating that the applicant's vehicle estimates could be low and asked for a more conservative analysis approach. The response from the applicant has been a reduction in the vehicle trip estimate in spite of an increase in the number of gaming positions and number of parking spaces on the site.</p> <p>Response: As described in Section 2.1.1 and 2.1.2, the Project's revised trip generation estimates and anticipated travel mode shares have been developed in collaboration with MassDOT.</p>
Stantec -10	<p>Comment: A new element of the TDM program is a premium shuttle bus service from Logan Express lots in the region. Logan Express travelers are not only avoiding congestion on the roadway but they are also avoiding very high parking fees at the airport for a trip that may last several days. Casino resort patrons on the other hand may only be parking at the resort for a few hours where parking fees may be non-existent or nominal. Consequently, the financial incentives are much different due to the different trip durations.</p> <p>Response: As discussed in Section 4.16 of the FEIR, the Proponent will incentivize patrons and employees to use the Premium Park and Ride service through a variety of methods.</p>
Stantec -11	<p>Comment: Independent of the effectiveness of the premium park and ride service the City questions whether or not this is an appropriate use of Logan Express parking spaces. To the extent that there are existing unused spaces available at these lots to serve casino resort patrons then leasing these spaces to a private entity to raise Massport revenues makes sense. However, the lease should be short-term in order to be able to effectively accommodate airport patron demand should that demand increase.</p> <p>Response: See Section 2.4.3.5 of the SFEIR.</p>
Stantec -12	<p>Comment: The applicant indicates that the proposed Malden Park was considered as one of the background development projects from a traffic perspective. However, it appears that the project was ignored from a parking perspective as Malden Park proposes to use the same two garages</p>

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	<p>in Malden Center for patron parking on summer evenings that the Wynn project intends to allocate to employees. These garages already experience significant daytime use serving local businesses and commuters into Boston. The viability of the Wynn employee parking plan is questionable if the Malden Park project moves forward.</p> <p>Response: The Proponent has a commitment from the City of Malden through its Surrounding Community Agreement to use one or both of the Malden Center garages for employee parking. The number of spaces to be leased is still to be determined.</p>
Stantec -13	<p>Comment: The driveway shown on the preferred plan is intersected by various service drives for the proposed resort. There have been no analyses provided to show how traffic using these drives interacts with through traffic on the main drive and how these interactions may affect operations of the Proposed Main Site Driveway /Route 99 intersection.</p> <p>Response: See Section 2.2.1 of the SFEIR.</p>
Stantec -14	<p>Comment: One of these service drives is described in Figure 4-9 as accommodating access to secured bicycle parking. The figure shows cyclists leaving the garage having to cross the four-lane, median-divided main access drive to return to Route 99. Cyclists heading west must mix with vehicular traffic, no bike lanes are shown on the drawing, cross an active tour bus drop-off/pick-up zone, and then apparently dismount to cross the driveway at the busy porte-cochere area. A more thoughtful, safer accommodation of cyclists seems appropriate.</p> <p>Response: The Proponent will work during the design process to optimize safe and convenient bicycle access to and from the on-site garage.</p>
Stantec -15	<p>Comment: The proposed service drive in this section is described as accommodating service vehicles, shuttle buses and taxi cabs. This further emphasizes the project's dependence on a roadway to be built on land that the applicant does not control.</p> <p>Response: See Response to Stantec -2.</p>
Stantec -16	<p>Comment: The preferred access plan continues to show an abrupt change in roadway alignment southbound on Alford Street at Dexter Street. This abrupt shift constitutes a safety hazard. The applicant has not explained how this can be mitigated. Acquisition of land from the Boston Water and Sewer Commission (BWSC) on the west side of Alford Street may be a solution but the BTD is unaware of any discussion between the applicant and the BWSC in this regard.</p> <p>Response: There is no land acquisition required from BWSC. The Proponent looks forward to working with the cities of Everett and Boston to</p>

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	complete the design of Lower Broadway/Alford Street (Route 99).
Stantec –17	<p>Comment: This section describes the proposed water shuttle plan which the BTD supports. However, the BTD is concerned that private vessels may seek to access the site from Boston Harbor. These boat movements may require opening and closing of the Alford Street drawbridge over the Mystic River impeding vehicular traffic on Alford Street. No analysis of these potential impacts has been provided and the applicant's policy with regard to private vessel access needs to be explained.</p> <p>Response: The Proponent has committed to using water shuttles that will not require opening the Alford Street drawbridge at any time. There may be private vessels that use the proposed docks, as there are vessels today that use the Mystic River. The impacts on bridge operations are not expected to be greater than they are under current conditions.</p>
Stantec –18	<p>Comment: Pedestrian access to the project site should be encouraged and the applicant has proposed plans to do so. Implied by the intersection capacity analysis results for the Site Driveway /Route 99 intersection, these plans include the provision of an exclusive pedestrian signal phase at this intersection. However, the analysis results do not reflect any actuation of this phase. As such, the capacity of the site driveway intersection is significantly overstated.</p> <p>Response: Section 2.2.1 includes the exclusive pedestrian phase at the site driveway/Broadway (Route 99).</p>
Stantec –19	<p>Comment: Details of the fee collection system at the on-site parking garage should be described and analyzed to ensure that vehicle queues forming at the garage entrance do not spill back to impede traffic flow on the site driveway and Route 99.</p> <p>Response: The Proponent will employ a full-time transportation coordinator to ensure that there is no on-site queuing that spills back to the intersection of the site driveway/Broadway (Route 99). Details of a fee collection system will be analyzed as the design of the Project continues.</p>
Stantec –20	<p>Comment: Shuttle bus services to two Orange Line stations are proposed. Plans and analyses should be provided to demonstrate that there is adequate space at the two Orange Line stations to accommodate the buses.</p> <p>Response: Section 2.4.3 shows detailed Proponent shuttle bus berthing plans and capacity analysis at both Wellington and Malden Center stations developed in consultation with the MBTA.</p>
Stantec –21	<p>Comment: An estimated 40 or so tour buses per day will visit the project site. Plans and analyses should be provided to demonstrate that there is</p>

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	<p>adequate space at the proposed tour bus drop-off/pick-up area to serve this demand without causing congestion on the main site driveway.</p> <p>Response: The Proponent will employ a full-time transportation coordinator to ensure that there is no on-site congestion, including managing the loading and unloading of tour buses. Figure 2-120 shows the location of tour bus drop-off/pick-up.</p>
Stantec -22	<p>Comment: The BTB commented on the DEIR noting that the applicant failed to present overall intersection volume-to-capacity ratios in the tables provided in the main report. (This information could only be found by looking at worksheets in the report appendix.) Volume-to-capacity ratios provide a very valuable measure of intersection performance.</p> <p>Response: Volume-to capacity-ratios are provided within the capacity analysis summary tables (CASTs) in Section 2.2.</p>
Stantec -23	<p>Comment: It does not appear that the "all walk" pedestrian signal phase considered in the level of service analysis for the site driveway intersection with Route 99. Certain movements at the intersection will operate with vehicle queues that significantly exceed the available storage capacity as noted in Table 4-10 under Friday, Build with Mitigation conditions.</p> <p>Response: See Section 2.2.1 for comprehensive revised analysis of the Broadway/Alford Street (Route 99) corridor intersections conducted in consultation with MassDOT, including additional queue analysis for these intersections, which demonstrates that the proposed improvements will effectively mitigate the impacts of Project traffic.</p>
Stantec -24	<p>Comment: The Beacham Street/Route 99 intersection is predicted to operate at an overall Level of Service D for the same conditions. Under Friday, Build with Mitigation conditions, this result is misleading as the westbound approach to this intersection is shown to be operating at 132 percent of capacity. Vehicle queues on this approach will be unmanageable.</p> <p>Response: Updated analysis of the Lower Broadway/Alford Street corridor is provided in Section 2.2.1.</p>
Stantec -25	<p>Comment: Improvements proposed for Sullivan Square, which at best could be considered interim improvements as they relate to existing roadway conditions rather than those proposed by the City, provide some level of mitigation but do not guarantee uncongested traffic operations.</p> <p>Response: See Section 2.2.7 of the SFEIR for the Proponent's proposed mitigation for Sullivan Square developed in consultation with MassDOT, the MBTA, and BTB which is consistent with the City's long-term plans for</p>

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	Sullivan Square.
Stantec –26	<p>Comment: Appropriate design drawings have not been developed to assess the feasibility of constructing the proposed Sullivan Square mitigation plan. The plan, illustrated in Figure 4-144B appears to require further evaluation. As shown, the plan abandons the existing counter-clockwise bus circulation pattern to some extent. It is not clear how buses are expected to exit the MBTA station under the proposed plan.</p> <p>Response: See Section 2.2.7 of the SFEIR for the Proponent's proposed mitigation for Sullivan Square developed in consultation with MassDOT, the MBTA, and BTD which is consistent with the City's long-term plans for Sullivan Square.</p>
Stantec –27	<p>Comment: The applicant claims that no mitigation is required for intersections along Rutherford Avenue in Boston yet Table 4-31 reports at least two turning movements at the Rutherford Avenue/ Austin Street intersection as operating over capacity under Friday, Build conditions. As noted in the BTD's comments on the DEIR, mitigation by Wynn Everett would also be warranted at this location after implementation of the BTD's plan for Rutherford Avenue. Similarly, there is one movement predicted to be operating over capacity at the City Square/Rutherford Avenue intersection.</p> <p>Response: The Project is not adding volume to the Rutherford Avenue/Austin Street intersection in the Build condition. All Project trips at this location would be in the underpass and would not need to pass through the signals. The overcapacity movement at City Square is not one to which the Project is adding trips.</p>
Stantec –28	<p>Comment: The findings of the applicant's parking analysis are suspect. The applicant should report on parking conditions at comparable resorts and reconsider the parking analysis with appropriate adjustments for an on-site hotel, restaurants and retail opportunities.</p> <p>Response: See the reevaluation of parking demand in Section 2.3 of the SFEIR.</p>

Greenman – Pedersen, Inc.	
GPI –1	<p>Comment: Given the critical nature of Intersections 37 & 39 – Mystic Valley Parkway (Route 16)/I-93 Southbound Exit 31 Off-Ramp, to both regional and local mobility it is apparent that more significant, physical improvements are warranted. These should both ensure to MassDOT's satisfaction that I-93 SB operations would not be impacted by vehicle</p>

Greenman – Pedersen, Inc.	
	<p>queues from this location and that City of Medford and Department of Conservation and Recreation (DCR) infrastructure is not unduly degraded. GPI recommends that the proponent commit to working with all stakeholders, MassDOT, the City of Medford and DCR, to develop and implement a mitigation plan that appropriately balances regional and local mobility needs.</p> <p>Response: The Proponent has committed to perform a Road Safety Audit (RSA) at this location.</p>
GPI –2	<p>Comment: Upon exiting I-93 SB the FEIR projects 100% of this project traffic with turn left to remain on the Mystic Valley Parkway to proceed onward to the project site. Consideration should be made for those who may travel west along Harvard Street to access Broadway southbound toward the Project Site. Likewise, concerns remain regarding the potential for cut-thru traffic utilizing Route 38 and Harvard Street to access I-93 to the north to avoid congestion on Alford Street (Route 99) and Sullivan Square.</p> <p>Response: The Proponent does not believe that Harvard Street to Broadway is a viable route to the Project Site, given the number of traffic signals along that route.</p>
GPI –3	<p>Comment: Wellington Circle is a location of longstanding regional congestion. While a notable amount of additional degradation to traffic operations is expected over the next 10 years regardless of the Wynn Everett project, the addition of Project generated traffic will have a significant compounding effect that needs to be mitigated prior to the opening of the Project. Medford continues to request consideration for a grade separated solution, which GPI considers appropriate given the magnitude of the needs at Wellington Circle.</p> <p>Response: As discussed in Section 2.2.6 of the SFEIR, the Proponent has committed to participate in the funding of a design study for Wellington Circle. In the meantime, the Proponent has proposed a mitigation plan that will improve conditions under the existing layout of the intersection.</p>
GPI –4	<p>Comment: In short the analysis presents an idealistic micro-scale analysis where a broader macro-scale solution is warranted of Wellington Circle. At a minimum GPI suggests that in addition to these improvements the Proponent fund a 25% level grade separated design for Wellington Circle to be utilized in the future should conditions warrant.</p> <p>Response: See Section 2.2.6 of the SFEIR.</p>
GPI –5	<p>Comment: It is unclear if the traffic impact analyses within the FEIR consider the employee travel patterns for those utilizing alternative</p>

Greenman – Pedersen, Inc.	
	<p>roadways to access the proposed off-site parking locations.</p> <p>Response: The analysis in the FEIR does include employee travel patterns to the off-site parking locations. It is noted that there will be no employee travel during the weekday p.m. peak period (4:30-6:00 p.m.) to reduce impacts during that period.</p>
GPI –6	<p>Comment: GPI would like to see further analyses of the merge sections at the intersection of Mystic Valley Parkway (Route 16) at Rivers Edge Drive in order to evaluate the impacts associated with employee shuttle routes and employees vehicles traveling from Malden and Station Landing.</p> <p>Response: The Woods Memorial Bridge reconstruction project will extend the merge and diverge lengths in both directions from the Rivers Edge Drive on- and off-ramps. This revised configuration will adequately serve traffic at this location, including the Project's additional employee and shuttle trips.</p>
GPI –7	<p>Comment: While 4:30 – 6:30 PM may be the critical evening peak period, Mystic Valley Parkway, Rivers Edge Drive experience noted congestion for a much broader period of time. Not understanding the impacts this additional employee traffic may impose on the local roadway network within the City of Medford during these periods potentially masks additional impacts. It is requested a more thorough analysis of this traffic analysis be presented even if it represents an off-peak condition (6:00 – 7:00 PM or 3:30 – 4:30 PM).</p> <p>Response: The Proponent is proposing to re-time the traffic signals at several locations in Medford. During the design of the signal timings, we will determine whether peak period timing plans need to be extended beyond the typical peak hours.</p>
GPI –8	<p>Comment: It is recommended that the scope of the monitoring be extended to include the following key locations and MBTA bus routes:</p> <p>Peak period manual turning movement, vehicle classification, and pedestrian/bicycle counts at the following intersections:</p> <ul style="list-style-type: none"> • Harvard Street at Mystic Valley Parkway (Route 16) and Mystic Avenue (Route 38) • Mystic Valley Parkway (Route 16) and Route 16 Southbound Connector • Harvard Street at Main Street <p>Annual public transportation counts for buses include the following MBTA</p>

Greenman – Pedersen, Inc.	
	<p>bus routes:</p> <ul style="list-style-type: none"> • Route 90 (Davis Square – Wellington Station) • Route 100 (Elm Street – Wellington Station) • Route 134 (North Woburn – Wellington Station) <p>Monitoring along the following corridors:</p> <ul style="list-style-type: none"> • Harvard Street • Mystic Avenue (Route 38) • Fellsway (Route 28) • Riverside Avenue • Rivers Edge Drive <p>Response: See Section 2.7 of the SFEIR for description of updated monitoring program which includes the requested roadway locations and MBTA bus routes.</p>
GPI –9	<p>Comment: It was noted that this traffic monitoring program would be conducted by the Proponent. GPI suggests that this role would be better suited for an independent 3rd party that would analyze traffic conditions and impartially determined the relative impact from the proposed Wynn casino.</p> <p>Response: As described in the Project’s updated transportation monitoring program provided in Section 2.7, the Proponent will implement annual monitoring and reporting consistent with applicable Gaming Commission license conditions, which call for funding of an independent monitoring organization.</p>
GPI –10	<p>Comment: The Proponent states that if the results of the traffic monitoring program indicated that if measured traffic volumes exceed 110% of projected values or project distribution varies by more than 10% of assumed values the proponent will undertake corrective measures. These measures include what GPI would consider “soft” corrective measures. Given the size and scale of the Project GPI recommends that more noted physical improvement measures should also be required if deemed appropriate.</p> <p>Response: The Project’s transportation monitoring program, in Section 2.7, provides for flexibility if additional traffic on alternative transportation measures are needed to address documented operational deficiencies if any. The examples of types of additional measures are not exclusive.</p>

Liz Levin & Company	
LLC – 1	<p>Comment: Fund the Sullivan Square Phase of the Redesign Plan.</p> <p>The FEIR shows the transportation impact of the Wynn Casino assuming that the Sullivan Square Rotary continues to be in place in 2023. The FEIR was silent on the impact of the Wynn Casino on the Redesign Plan except to say that the transportation mitigation improvements proposed by Wynn Casino would dovetail with the City's future roadway options for the area. We all know that today's Sullivan Square rotary no longer works.</p> <p>Response: The Proponent will continue to support the City of Boston in advancing a long-term vision for Sullivan Square and Rutherford Avenue that will improve safety and functionality pursuant to the terms of the Gaming License.</p>
LLC – 2	<p>Comment: Reduce the Parking Garage to 2900 parking spaces.</p> <p>The FEIR Wynn Casino program now includes a robust transportation demand management program. That program reduces trip generation, which is excellent. However, the FEIR Wynn Casino program now also includes far larger garage than previously (3,700 spaces versus 2,900 spaces). This sizeable increase is most likely not warranted. As Cambridge MA has shown, smaller garages are an integral element of transportation demand management programs. My suggestion is that MGC license condition include the original garage size of 2,900 and require that any subsequent increase in the size of the garage be done only after the project is operational and the traffic works well.</p> <p>Response: See Section 2.3 of the SFEIR for a reevaluation of parking demand including an explanation of why the suggested limitation of the number of parking spaces is inappropriate.</p>
LLC – 3	<p>Comment: Strengthen the Transportation Monitoring Program and Enforcement</p> <p>The FEIR transportation mitigation includes a transportation coordinator, the setting of annual transportation goals, an annual monitoring program and annual public report on the goals and the monitoring. The dollars devoted to this effort are \$30,000 annually. The program elements and costs should be strengthened. The labor and data collection elements of the program particularly should be strengthened to make sure that the transportation coordinator is a professional and that critical traffic, pedestrian and bicycle count information as well as mode share information are adequately captured and shared with the community. Funds should also be available for enforcement by the City and State. In addition, there should be an option to extend the monitoring program for an additional five years if the traffic goals aren't met and/or traffic</p>

Liz Levin & Company	
	<p>conditions are worse than predicted.</p> <p>Response: See Section 2.7 of the SFEIR describing updated transportation monitoring and annual reporting commitments.</p>
LLC – 4	<p>Comment: Fund a Transit Study of the Orange Line.</p> <p>The Orange Line is a workhorse of the MBTA system. The MBTA is buying new Orange Line Cars. With these new cars there is an opportunity to make power and track improvements that collectively would make the customer trips more comfortable and convenient all along the line. The study proposed here would contribute to moving forward important Orange Line improvements. It would help Wynn Casino’s employees and customers who may choose to ride the Orange Line as well as residents of Charlestown, Everett, Somerville, Malden and Medford.</p> <p>Response: Since filing the FEIR, the Proponent has consulted extensively with the MBTA regarding analysis of the Project’s impacts on the MBTA Orange Line. Using MBTA data, a comprehensive analysis was conducted and is included in Section 2.4.2.</p>
LLC – 5	<p>Comment: Fund a Visioning Program for Charlestown.</p> <p>Charlestown residents do not have an overall master plan for future development along the south side of Rutherford Ave., the entire Sullivan Square and Mystic waterfront area. Many of us have been requesting that the BRA undertake a community visioning effort for that purpose. It would be appropriate for Wynn Casino to fund that study since Wynn Casino will impact development potential in the area. The study will help community have a unified vision and provide the appropriate land use and zoning controls to attract development it wants and to discourage development it doesn’t want.</p> <p>Response: The conditions set forth in the Gaming License provide funding to the City of Boston that could be used to support the requested land use planning.</p>
LLC – 6	<p>Comment: Fund Public Engagement in the Construction & Remediation Management Program</p> <p>Remediation & Construction of the Wynn Casino will be a major effort. There should be a well thought out public engagement program. Of particular interest to Charlestown residents will be traffic and public safety associated with construction traffic, closure of streets and site remediation.</p> <p>Response: See responses to Boston ED-2 and CWC-2.</p>

John Vitagliano	
JV – 1	<p>Comment: A significant transit impediment to the Wynn-Everett water ridership projections is that of the bi-weekly closure of the section of the inner harbor by liquefied natural gas carrier (LNGC) vessels supplying the LNG storage facility at the Dstrigas facility in Everett located on the Mystic River approach to the Wynn-Everett casino site. This bi-weekly inner harbor LNG closure is mandated by US Coast Guard regulation, specifically Title 33 of the US code of Federal Regulations.</p> <p>Response: The Proponent is aware of the LNG ship movements and has consulted with the Everett Harbormaster's office, the Boston Harbormaster and the Boston Harbor pilots, all of whom are knowledgeable with respect to navigation and safety issues. Based on these consultations, the Proponent does not believe the occasional ship movements will be a significant impediment to water transportation services.</p>
JV – 2	<p>Comment: In addition to this regular harbor safety restrictions there are other maritime operational factors which I am thoroughly familiar with which are the basis of my estimate that the Wynn- Everett water ridership projections are inflated by 100%.</p> <p>Response: The FEIR outlined the methodology by which the water shuttle ridership was estimated. This methodology was accepted by MassDOT.</p>
JV – 3	<p>Comment: The Wynn-Everett DEIR is also deficient in its failure to acknowledge the serious safety and environmental consequences of the Wynn-Everett casino's close proximity to the massive Dstrigas liquefied natural gas facility in Everett whose inherent safety is questionable enough that one of former Boston Mayor Thomas Menino's top priorities was the closure of the facility. The Dstrigas facility is unique in terms of its proximity to a major urban area.</p> <p>Response: The Proponent does not agree that the proximity of the LNG storage facilities presents a serious safety risk to the facility.</p>
JV – 4	<p>Comment: Note in particular the Boston Globe graphic, based on Sandia Laboratories study, showing that the proposed Wynn-Everett casino site lies well within the predicted 4,200 ft. radius within which people would be severely injured from an LNG explosion.</p> <p>Response: The Proponent does not agree that the proximity of the LNG storage facilities presents a serious safety risk to the facility.</p>

Peter Giannikopoulos

PG – 1

Comment: In addition, Steve Wynn's traffic proposal will expedite existing traffic and impact future conditions by tenfold.

Response: Chapter 2 of the SFEIR presents a comprehensive transportation impact assessment including the identification of improvements that will effectively mitigate the Project's traffic.

Terry Baldwin-Williams

TBW – 1

Comment: Voices support for the proposed Wynn Mass LLC traffic mitigation plan.

Response: The support for the Proposed Project plans is appreciated.



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August 15, 2014

CERTIFICATE OF THE SECRETARY OF ENERGY AND ENVIRONMENTAL AFFAIRS
ON THE
FINAL ENVIRONMENTAL IMPACT REPORT

PROJECT NAME : Wynn Everett
PROJECT MUNICIPALITY : Everett
PROJECT WATERSHED : Boston Harbor
EEA NUMBER : 15060
PROJECT PROPONENT : Wynn MA, LLC
DATE NOTICED IN MONITOR : July 9, 2014

Pursuant to the Massachusetts Environmental Policy Act (G. L., c. 30, ss. 61-62I) and Section 11.10 of the MEPA regulations (301 CMR 11.00), I hereby determine that this project **does not adequately and properly comply** with MEPA and its implementing regulations. The Proponent is required to submit a Supplemental Final Environmental Impact Report (SFEIR) in accordance with the scope included in this Certificate. The scope of the SFEIR is limited to traffic and transportation issues and a Response to Comments.

Project Description

As described in the FEIR, the project consists of the redevelopment of a 33.9-acre site in Everett as a destination resort casino. The site is located on Horizon Way and Lower Broadway (Rt. 99) in Everett. The Proponent is seeking a Category 1 gaming license pursuant to Chapter 194 of the Acts of 2011: An Act Establishing Expanded Gaming in the Commonwealth and M.G.L. Chapter 23K, Section 19, as amended by Section 16 of the Expanded Gaming Act, which authorizes the Massachusetts Gaming Commission (MGC) to license three casinos. The Act identifies three regions of the state - Region A (Suffolk, Middlesex, Essex, Norfolk and Worcester counties), Region B (Hampshire, Hampden, Franklin and Berkshire counties) and Region C (Bristol, Plymouth, Nantucket, Dukes and Barnstable counties) – and authorizes MGC to permit one casino in each region. This project is located in Region A and is one of 2 proposed casinos.

The project will include a total of 3,038,695 square foot (sf), comprised of the following:

- A gaming facility with 3,200 slot machines and 160 gaming tables (4,160 total gaming positions)
- A hotel tower, 386-foot high, with 504-rooms (approximately 543,677 sf)
- Retail space (77,250 sf)
- Food and beverage space (64,593 sf)
- Lobbies, lounge, and an atrium garden (front-of-house) (75,473 sf)
- A spa, gym, and convention/meeting rooms (46,072 sf)

The Proponent proposes to construct a parking structure below the Casino Level (including under the retail portion of the Project), with three below-grade levels and one at-grade level to provide self-serve and valet parking spaces for patrons. Employee parking will be accommodated at off-site locations. The Proponent will provide shuttle service to and from the Project Site. In addition, there are 3,700 on-site parking space and 800 off-site parking spaces for employee parking. Employee parking will located at existing parking facilities or newly constructed lots.

The project includes remediation and restoration of the site. The proposed shoreline work includes the installation of a vertical steel pile bulkhead, the placement of stone revetments and the installation of pile-supported walkways, the removal of abandoned and deteriorated structures and remnants, salt marsh restoration and re-vegetation of the shoreline. The waterside work includes the dredging of approximately 12,700 cubic yards (cy) of sediment over approximately 41,080 sf to provide an adequate water depth of six feet below mean low water (MLW) to accommodate water transportation vessels. Coastal bank and salt marsh restoration is proposed within a 69,000 sf area landward of high tide at the southwestern edge of the site. Connections from the harborwalk on the Project Site via a new pedestrian and bicycle path under the MBTA right-of-way are proposed.

Access to the Project Site is proposed via a new boulevard-type driveway located approximately 150 feet north of Horizon Way. It will intersect the west side of Lower Broadway (Route 99) just north of Horizon Way opposite Mystic Street. This access requires acquisition of land (approximately 0.5 acres) from the Massachusetts Bay Transportation Authority (MBTA) and the removal and relocation of certain infrastructure elements associated with operation of the MBTA maintenance facility. The current unsignalized entrance driveway to the MBTA maintenance facility will be relocated to the north on Lower Broadway to the signalized intersection at Beacham Street.

A Host Community Agreement (HCA) was executed with the City of Everett on April 19, 2013. It was approved by the citizens of Everett pursuant to a referendum held on June 22, 2013, in accordance with the Gaming Act. It indicates that the Project will provide 4,000 construction jobs and 4,000 permanent jobs, improve and expand infrastructure, and support a myriad of community programs and services. The HCA identifies the following payments to the City of Everett: \$30 million for capital improvements; \$20 million annual PILOT payments; \$5 million annual community impact fee; and, \$250,000 annual contribution to the Everett Citizens Foundation. Pursuant to M.G.L Chapter 23K, a portion of the taxes on the Project's gaming revenue will be allocated to a community mitigation fund. The City of Boston requested that it be identified as a host community; however, the MGC determined that it did not meet the criteria for a host community.

The Proponent entered into Surrounding Community Agreements (SCA) with the City of Malden (November 12, 2013), the City of Medford (April 11, 2014), and the City of Cambridge (April 22, 2014). The Proponent entered into Neighboring Community Agreements with the City of Lynn and the City of Melrose on January 28, 2014. The Proponent entered into arbitration proceedings with the Cities of Chelsea and Somerville and arbitrators' awards were filed with the MGC on June 9, 2014. Wynn and the City of Somerville executed a SCA on June 12, 2014. A SCA has not been executed with the City of Boston.

The Expanded Gaming Act establishes a Community Mitigation Fund, which is administered by the MGC. Monies from the Community Mitigation Fund shall be used to:

...assist the host community and surrounding communities in offsetting costs related to the construction and operation of a gaming establishment including, but not limited to, communities and water and sewer districts in the vicinity of the gaming establishment, local and regional education, transportation, infrastructure, housing, environmental and public safety, including the office of the county district attorney, police, fire, and emergency services (M.G.L. Chapter 23K, Section 61(b)).

I note that the Expanded Gaming Act requires the establishment of a Subcommittee on Community Mitigation consisting of 12 members, including, but not limited to, representatives from each Region's Host Community, local chambers of commerce, the Department of Revenue's Division of Local Services, the MGC, the Massachusetts Municipal Association, and an appointee of the Governor. Among other responsibilities, this subcommittee will develop recommendations to be considered by the MGC regarding how funds may be expended from the Community Mitigation Fund (M.G.L. Chapter 23K, Section 68(b)). Furthermore, each Region may establish a local Community Mitigation Advisory Committee, which shall include no fewer than six members, to provide information and develop recommendations for the Subcommittee on Community Mitigation, including ways in which funds may be expended from the Community Mitigation Fund. This local committee will include members appointed by Host and Surrounding Communities, the regional planning agency, and the MGC to represent chambers of commerce, regional economic development, and human service providers. (M.G.L. Chapter 23K, Section 68(e)).

Project Site

The 33.9-acre site is located in Everett adjacent to the Mystic River. Approximately 25.6 acres are upland, surrounded by shoreline and the remnants of marine structures, and approximately 8.3 acres are located below mean high water (MHW) on the Mystic River. The site includes approximately 1,600 lf of shoreline along flowed tidelands. A small area of the site is used as a materials storage yard and includes a 5,200 sf construction trailer/office. Historic uses include the Monsanto chemical manufacturing facility. The site is classified as a disposal site subject to Massachusetts General Law Chapter 21E (MGL c.21E) and the Massachusetts Contingency Plan (MCP). It is contaminated and contains very high levels of arsenic and lead, both in soil and groundwater. Contaminated sediments have also been identified in the area of the site within the Mystic River.

The site is bordered to the west by the tracks of the MBTA Newburyport commuter rail line. The upland portions of the site are bounded by Horizon Way, Rt. 99, and commercial and institutional properties. Most of the soils on the site are disturbed and comprised of fill material. Along the shoreline

is a mix of deteriorated stone seawalls, loose gravel and boulders, and rotted timber piers and pilings. The shallower portions of the shoreline also contain debris and remnants of timber structures.

Access to the site is via Horizon Way which forms an unsignalized intersection with Broadway (Rt. 99) in Everett. The site is located in an urban, commercial/industrial area that suffered from economic disinvestment during the latter part of the twentieth century when manufacturing, import and fishery activities declined. Surrounding land uses are primarily commercial/retail, with local businesses (e.g. an auto dealership, chain restaurants, and an auto repair shop) and infill residential structures nearby. Proximate uses include Boston Water and Sewer Commission (BWSC) and Massachusetts Water Resources Authority (MWRA) properties, an MBTA service center to the north, and the Gateway Center and Gateway Park to the west. The Department of Conservation and Recreation (DCR) owns and operates parkways in the vicinity of the site, including Revere Beach Parkway, the Fellsway and Mystic Valley Parkway. In addition, DCR owns and operates the Mystic River Reservation and the Amelia Earhart dam, a flood control structure located on the Mystic River in the vicinity of the site.

The site is bordered by the Mystic River to the south and an embayment to the east. The embayment is approximately 350 to 500 feet wide from shoreline to shoreline (from the Project area to the upland east of the embayment containing the operations of the MWRA and BWSC). The embayment contains a former channel which was reportedly constructed in the mid-1800s. Records indicate the channel to be about 1,000 feet long with a width of 100 feet, and an original draft of 20 feet below MLW. The channel flares out at the northern end to about 250 feet wide. The channel has since shoaled, and the present depth does not exceed 13 feet below the MLW mark. Waters adjacent to the channel are shallower than the central portion of the channel. The eastern side of the embayment is a mud flat with surface grades from the MLW mark to about three feet above it. The mud flat contains a variety of debris, including several abandoned timber barges.

Permits and Jurisdiction

The project is subject to MEPA review and requires the preparation of a Mandatory EIR pursuant to 301 CMR 11.03(1)(a)(2), 11.03(3)(a)(5), 11.03(6)(a)(6) and 11.03(6)(a)(7) because it requires State Agency Actions and it will create 10 or more acres of impervious area, create a New non-water dependent use occupying one or more acres of waterways or tidelands, generate 3,000 or more New adt on roadways providing access to a single location, and provide 1,000 or more New parking spaces at a single location

The project requires a Category 1 Gaming License from the MGC, a Vehicular Access Permit from the Massachusetts Department of Transportation (MassDOT), a Construction and Access Permit from DCR, and Airspace Review by the Massachusetts Aeronautics Commission (MAC). It requires a Sewer Use Discharge Permit (or waiver) from the MWRA and may also require a 8(M) Permit from MWRA. It requires a Chapter 91 (c.91) License and a 401 Water Quality Certification (WQC) from the Massachusetts Department of Environmental Protection (MassDEP) and it may also require an Air Plan Approval from MassDEP. It may require Federal Consistency Review by Coastal Zone Management (CZM). The project is subject to the May 5, 2010 MEPA GHG Emission Policy and Protocol (GHG Policy). The project will also require a land transfer from the MBTA.

The project is not subject to the enhanced analysis provisions of the EEA Environmental Justice (EJ) Policy. The project is located in and adjacent to communities with designated EJ populations; however, the project does not exceed the MEPA thresholds for solid waste or air quality that trigger a requirement for enhanced analysis.

It will require multiple permits and approvals from the City of Everett, including an Order of Conditions from the Everett Conservation Commission (or a Superseding Order of Conditions (SOC) from MassDEP if the local Order is appealed). It will require approvals from the City of Boston Transportation Department and the Public Improvements Commission (PIC) for off-site roadway improvements.

The project requires a Section 404 Clean Water Act Permit and a Section 10 Permit from the United States Army Corps of Engineers (ACOE). In addition, the project may require approval from the Federal Highway Administration (FHWA) for modifications to the highway system (I-93) and/or for work on the National Highway System (NHS). As a result, the project may be subject to review pursuant to the National Environmental Policy Act (NEPA) and review pursuant to Section 106 of the National Historic Preservation Act (NHPA). The project also requires a Part 77 Airspace Review from the Federal Aviation Administration (FAA) and a National Pollutant Discharge Elimination System (NPDES) Construction General Permit (CGP) from the United States Environmental Protection Agency (EPA) for stormwater discharges from a construction site of over one acre.

MEPA jurisdiction is limited to the subject matter of required or potentially required permits; however, the subject matter of the Gaming License confers broad scope jurisdiction and extends to all aspects of the project that may cause Damage to the Environment, as defined by the MEPA regulations.

Project Changes Since the Filing of the Draft EIR

The FEIR identifies the same elements as the Draft EIR program, however, design advancements and coordination with State Agencies, the City of Everett and other parties has resulted in some project changes. Square footage associated with some project components has changed, the area of landscaped open space adjacent to the harborwalk has been increased in conjunction with a decrease in retail space, and additional areas for public use have been provided. Access to the site has been redesigned and consists of a boulevard-type driveway via Broadway just north of Horizon Way and a secondary access drive to the north.

Specifically the changes include:

- The gaming area has been increased from 167,880 sf to 192,543 sf, an increase of 24,663 sf, with ten additional tables and 188 additional total gaming positions.
- Retail uses are reduced from 89,140 sf to 77,250 sf, a decrease of 11,890 sf.
- The hotel tower has been reduced from 627,073 to 543,677 sf, by 83,396 sf, and rooms increased slightly from 500 to 504.
- Food and beverage areas have increased from 57,591 sf to 64,593 sf, an increase of 7,002 sf, consistent with the additional gaming positions
- Convention/meeting area has decreased from 34,998 sf to 32,942 sf, a decrease of 2,056 sf;

- The spa/gym space has increased from 13,110 sf to 13,130 sf, an increase of 20 sf.
- The entertainment/nightclub area has increased from 11,774 sf to 30,392 sf, an increase of 18,618 sf.
- The back-of-house support has increased from 310,248 sf to 383,725 sf, an increase of 73,477 sf.
- The front-of-house support has increased from 57,339 sf to 75,473 sf, an increase of 18,134 sf.
- Parking spaces have increased from 2,909 spaces to 3,700 spaces which is an additional 791 spaces.
- The size of the parking garage has increased from 1,250,000 sf to 1,624,970 sf, which is an increase in 374,970 sf.

Consistent with these changes, trip generation is projected to increase. The project will generate approximately 31,032 new (unadjusted) average daily weekday vehicle trips (adt), an increase of 9,480 adt from the 21,552 adt identified in the DEIR. It will generate 39,139 new (unadjusted) adt on a Saturday, an increase of 13,683 from the 25,456 adt identified in the DEIR.

The FEIR includes a revised and more detailed off-site transportation mitigation program, including changes to mitigation proposed for Santilli Circle. The proposed viaduct and single-point urban interchange (SPUI) design has been replaced with a flyover ramp from Route 16 Eastbound to the Route 99 Connector.

Since the Draft EIR Certificate, the Proponent has consulted with the US Army Corps of Engineers and the Federal Highway Administration (FHWA) regarding the requirements to address potential Project impacts under the National Environmental Policy Act. Route 16 and Route 99 are both National Highway System (NHS) roadways, which require that MassDOT evaluate, approve, and document any design exceptions. The proposed transportation improvements for these locations are not anticipated to require design exceptions, but if necessary, the Proponent will prepare a Categorical Exclusion (CE) checklist for each location. The Proponent has prepared a Project Framework Document (PFD) for review by MassDOT prior to submittal to FHWA.

The FEIR discusses a new shuttle bus system, a water taxi/shuttle dock that will be available as a new stop for water transportation routes, and a shared use path intended to provide continuous bicycle and pedestrian access and amenities along the waterfront. The FEIR has increased the estimated water transportation share for patrons from 3% in the Draft EIR to 6% in the FEIR. The Proponent has also committed to work with the MBTA to enhance the existing bus stops on Broadway (Route 99) near the primary site driveway, which serve three existing MBTA bus routes.

Environmental Impacts

Potential environmental impacts are associated with the creation of 19.42 acres of impervious surfaces, alteration of wetland resource areas, 266,554 gallons per day (gpd) of water use, generation of 242,322 gpd of wastewater, and dredging of 12,700 cy of sediments. The Project will generate approximately 31,032 new (unadjusted) adt and 39,139 new (unadjusted) adt on a Saturday. When adjusted for mode share, the project is estimated to generate approximately 19,594 adt on a weekday and 24,456 adt on a Saturday.

Measures to avoid, minimize and mitigate impacts include redevelopment and remediation of a brownfield site located in proximity to transit, provision of 7.42 acres of open space, access to and along the Mystic River including a connection to Gateway Park, salt marsh restoration and replication of shellfish beds, installation of a stormwater management system, roadway improvements, and improvements to transit, bike and pedestrian access. The building will be designed to be certifiable by the US Green Building Council's Leadership in Environmental and Energy Design (LEED) at the Gold level, or higher, the project incorporates measures to improve energy efficiency including use of a Combined Heat and Power (CHP) system and incorporation of renewable energy.

Review of the FEIR

Project Description and Permitting

The FEIR included a detailed description of the proposed project, potential impacts and measures to avoid, minimize and mitigate environmental impacts. The FEIR contained supporting graphics and updated site plans clearly identifying existing and proposed conditions. It identified federal, State, and local permits and approvals required for the project and discussed how the proposed project will be developed in a manner consistent with applicable regulatory standards and requirements. The FEIR contained a summary of the relevant sections of the Expanded Gaming Act, the MGC application process and provided an update on the status of its application.

The project will require Access Permits from MassDOT and from DCR, in addition to local approvals for proposed roadway improvements. Specifically, the project will require an Access Permit from MassDOT to implement improvements for modifications to the I-93 Northbound off-ramp at Exit 28. In addition, the Proponent must prepare a Project Framework Document (PDF) for the proposed ramp modifications. The PDF will be subject to review and approval by MassDOT and subsequent submittal to the Federal Highway Administration (FHWA). FHWA will review the PFD for conformance with the FHWA's Policy on Access to the Interstate System.

The proposed access drive will require the Proponent to acquire land from the MBTA to accommodate driveways in and out of the Project Site. MBTA infrastructure will be removed and relocated to support ongoing operation of the MBTA maintenance facility. In addition, the unsignalized entrance driveway to the maintenance facility would be relocated to the north at the signalized intersection at Beacham Street. MassDOT comments emphasize the importance of ensuring that these operations, which operate seven days a week and 24 hours a day, are not impacted by the project.

The proposed improvements along the Route 16 corridor at Wellington, Santilli, Sweetser, and Bell Circles are primarily under the jurisdiction of DCR. However, DCR and MassDOT are considering the potential transfer of the segment of Route 16 from I-93 to Bell Circle. DCR will be the permitting authority for the proposed improvements at these locations until a transfer is completed. In anticipation of its future responsibility for these facilities, however, MassDOT will coordinate the review and permitting of the improvements to ensure that they are consistent with MassDOT design standards.

Roadway improvements will also require approvals from municipalities including the City of Everett, the City of Revere, and the City of Boston.

Traffic and Transportation

The FEIR includes an updated transportation study prepared in conformance with the EEA/MassDOT Guidelines for Transportation Impact Assessments (TIA). The study includes an assessment of the transportation conditions in the project study area based on an analysis of existing and future conditions and identifies proposed mitigation. The TIA includes revised trip generation estimates along with future transportation demands due to projected regional traffic growth, independent of the proposed development.

Mitigation includes a multimodal approach consisting of highway, transit, bicycle, water transportation, and pedestrian improvements. Roadway improvements have been revised since the DEIR, including an alternative design for Santilli Circle. The FEIR included conceptual plans (at 200-scale and 80-scale) for proposed roadway improvements. The plans did not provide sufficient details to fully assess the feasibility of proposed improvements (jurisdiction, rights-of-way, land ownership, etc.). Potential environmental impacts associated with proposed roadway improvements (e.g. wetlands impacts, stormwater, etc) were identified in the narrative and/or on project plans and quantified. The FEIR describes the consistency of access drives and roadway improvements with a Complete Streets design approach that provides adequate and safe accommodation for all roadway users, including drivers, pedestrians, cyclists and transit riders. The FEIR included site circulation plans that identified how vehicular (including trucks, shuttle buses, tour buses), pedestrian and bicycle access will be provided throughout the site. In addition, a transportation demand management (TDM) program is proposed to reduce vehicle trips and further mitigate the impacts of the project.

The study area was developed based on the trip distribution pattern for the Project, a review of both the local and regional transportation system, and consultation with MassDOT, the MBTA, DCR, and the City of Everett. The numbering of the locations follows the same convention that was reviewed in the DEIR. Locations that were not impacted in the DEIR, were not reanalyzed. The FEIR study area consists of the following intersections and rotaries:

1. Horizon Way/Broadway (Route 99), Everett;
2. Mystic Street/Bow Street, Everett;
3. Lynde Street/Broadway (Route 99), Everett;
5. Thorndike Street/Broadway (Route 99), Everett;
7. Beacham Street/Broadway (Route 99), Everett;
8. Bowdoin Street/Broadway (Route 99), Everett;
10. Revere Beach Parkway (Route 16)/Santilli Highway/Mystic View Road/Route 99 Connector (Santilli Circle), Everett (DCR jurisdiction);
11. Revere Beach Parkway (Route 16)/Broadway (Route 99)/Main Street (Sweetser Circle), Everett (DCR jurisdiction);
28. Revere Beach Parkway (Route 16)/Union Street, Chelsea (DCR jurisdiction);
29. Revere Beach Parkway (Route 16)/Washington Avenue, Chelsea (DCR jurisdiction);
30. Revere Beach Parkway (Route 16)/Webster Avenue, Chelsea (DCR jurisdiction);
32. Beach Street/Everett Street/Route 1A/Route 16/Route 60 (Bell Circle), Revere;
38. Route 16/Route 38, Medford;

39. Mystic Valley Parkway/Route 16 SB Connector, Medford;
42. Mystic Valley/Revere Beach Parkway (Route 16)/Fellsway (Route 28)/Middlesex Avenue (Wellington Circle), Medford;
51. Dexter Street/Alford Street (Route 99), Boston;
52. Cambridge Street/I-93 Northbound Off-ramp, Boston (MassDOT);
53. Main Street/Maffa Way/Cambridge Street/Alford Street (Sullivan Square), Boston;
54. Austin Street/New Rutherford Avenue (Route 99), Boston;
55. New Rutherford Avenue (Route 99)/Route 1 Ramps, Boston; and
56. New Rutherford Avenue (Route 99)/Chelsea Street (City Square), Boston.

Existing Conditions

The FEIR described existing conditions within the study area including roadway geometrics, pedestrian and bicycle facilities, public transportation services, and operating characteristics as well as posted speed limits and land use information. It identifies the MBTA maintenance facility and associated service drives. Queue observations were completed at the major intersections and selected signalized intersections to calibrate traffic models.

The existing conditions analysis indicates that a number of intersections within the study area are operating at Level of Service (LOS) D and worse, with excessive delays and queuing. The FEIR identifies proposed improvements to address existing conditions already in the local and/or state planning and design process. Improvements have been designed for many locations (Rutherford Avenue corridor and Sullivan Square) while others are the focus of on-going or planned studies (Wellington Circle).

Traffic Growth and Trip Generation

General background traffic growth trends were developed using traffic-volume data compiled by MassDOT from permanent count stations and historic traffic counts in the area. The cities of Everett, Boston, Somerville, Revere, Chelsea, Medford, Malden, and Cambridge were contacted in order to obtain information on specific development projects by others that may add traffic to the study area in excess of the background traffic growth rate. To account for background traffic growth, a rate of 0.5% per year compounded annual was incorporated into the analysis.

The FEIR has updated the trip generation summary table to show all assumptions, land uses, and changes in the development program. Trip generation calculations are based on empirical data for casinos and trip generation rates from the Institute of Transportation Engineers (ITE) Trip Generation Manual associated with specific land use codes (LUC). These include hotel (LUC 310), retail uses (LUC 820 - Shopping Center) and entertainment (LUC 925 - Drinking Place). A correlation between the number of gaming positions and trip generation was developed based on the size, location, and traffic volumes of comparable casino sites (World Resort Casino at Aqueduct in New York, NY and the Casino de Montreal in Montreal, Quebec). The FEIR has established trip generation rates for vehicular traffic for the daily, Friday and Saturday peak hours. The rates have been adjusted based on projected mode share and credits for multi-purpose trips, transit trips, and hotel trips. Mode share was calculated separately for employees and patrons.

The FEIR trip generation calculations include a reduction in the percentage of patrons vehicle trips (from 69% to 63%), a reduction in employees parking off-site (44% to 41%) and corresponding increases in water transportation and shuttle mode shares. The water transportation share has increased from 3% to 6% in the FEIR. The Premium Park and Ride shuttle service, which was not identified in the DEIR, is projected to serve 3% of patrons and 3% of employees.

In its comments on the DEIR, MassDOT concurred with the methodology used to develop the project's trip generation rates. MassDOT comments on the FEIR reiterate that, given the urban context of the project, the commitment to a strong TDM program, and the ability to hold the Proponent accountable to site trip reduction strategies through monitoring and reporting, the project can assume a significant number of non-private vehicular trips. However, comments from MassDOT, MAPC and City of Boston identify questions regarding calculation of mode shares and a concern that some trips are double counted. As an example, patrons that access the site via the MBTA Orange Line and take the shuttle from the station to the site are counted as arriving both via shuttle service and public transit (the Orange Line). MassDOT discussed this issue with the Proponent and a revised methodology will be provided in the SFEIR.

Traffic Operations and Mitigation

The TIA identifies proposed roadway mitigation and provides analysis of Existing Conditions (2013), No Build Conditions (2023), Build Conditions (2023) and Build Conditions – Mitigated (2023). It identifies the LOS, Delay, Volume to Capacity (V/C) Ratios, and 50th and 90th Percentile Queue Length for each intersection in the study area. Several locations within the study area are expected to experience deteriorating conditions in the Future Build condition. MassDOT notes that the project would adversely impact key locations on the state highway system (as well as several locations under local jurisdiction), which are expected to provide regional access to the project site. These locations are generally operating at capacity during the peak hours with excessive queuing, and many have existing safety concerns. The SYNCHRO analysis results also indicate that, in most cases, queues at these intersections would extend beyond available queue storage space. These locations include:

- Route 99 corridor (between Sullivan Square and Sweetser Circle);
- Rutherford Avenue corridor (between Washington Street and Sullivan Square);
- Sullivan Square in Boston;
- I-93 northbound off-ramp/Cambridge Street intersection in Boston.
- Santilli Circle in Everett;
- Sweetser Circle in Everett;
- Wellington Circle in Somerville; and
- Bell Circle in Revere.

The Proponent had developed a VISSIM simulations model to verify mitigation plan performance measures and has shared this model and results with MassDOT; however, a discussion regarding the model and results was not included in the FEIR. Upon review of the SYNCHRO analysis and the VISSIM model, MassDOT noted some inconsistencies between signal locations and intersection approach geometry (e.g., number of lanes, lane width, lane usage, etc.) and inconsistencies in results (e.g. peak hour queues predicted by SYNCHRO are much longer in some locations than those

identified by the VISSIM model). The Proponent has consulted with MassDOT to address these inconsistencies and will provide additional information regarding the two models in the SDEIR. ²

The following provides a summary of proposed mitigation, impact on traffic operations and comments regarding proposed improvements.

Lower Broadway/Alford Street (Route 99): Lower Broadway (Route 99) will be reconstructed between Revere Beach Parkway (Route 16) and the primary access drive to provide a four-lane cross-section (two lanes each direction) with additional turning lanes provided at major intersections, and sidewalks on both sides. Two left turn lanes are proposed on Alford Street to access the site.

The analysis identifies improvements to operations between the Build and Build Conditions-Mitigated; however, comments identify concerns with queuing and adequate vehicle storage capacity as well as potential impacts to upstream intersections, in particular during the Friday PM peak period. In addition, as noted previously, these improvements will require land acquisitions from the MBTA and from property owners in Boston. Comments from the City of Boston express concern with the feasibility of the access improvements, including required land acquisitions, and whether adequate capacity can be provided to meet travel demands without degrading operations on Alford Street.

Sullivan Square/Rutherford Avenue/I-93 Northbound Off-Ramp: The Sullivan Square/Rutherford Avenue area will process project-related traffic from the south. Proposed improvements include upgrades to the traffic signal equipment at the intersections of I-93 Off-ramp (Ramp C-L) and Maffa Way; installation of new traffic signals at the intersection of Spice Street/MBTA Busway/Cambridge Street and Maffa Way/MBTA Busway; reconstruction of the busway between Cambridge Street and Maffa Way; widen the Main Street approach to the Cambridge Street/Maffa Way intersection to provide two approach lanes; reconstruction of the southbound approach of Alford Street at Cambridge Street; and interconnect and optimize traffic signal timing, phasing and coordination. In addition, it will include reconstruction of the sidewalks along the west side of Sullivan Square to improve the pedestrian connection between the MBTA station and Sullivan Square. The FEIR includes conceptual plans and capacity analysis for the proposed interim improvements and provides a summary of delay, v/c, and 50th and 95th percentile queues for all the intersections within and in the vicinity of the traffic circle.

MassDOT comments express concern with the I-93 northbound off-ramp and with consistency of proposed interim improvements in Sullivan Square with long-term improvements to Sullivan Square and Rutherford Avenue. MassDOT notes that a queue of 667 feet (27 vehicles) would occur on the Cambridge Street eastbound approach during the Friday PM peak under the Build-Mitigated scenario. Although this is an improvement compared to No Build conditions, this queue would still extend beyond the I-93 NB exit ramp and could result in lengthier queues on the ramp itself.

Comments regarding planning consistency are echoed by MAPC, the City of Boston, and residents of Charlestown. MassDOT comments indicate that it is overseeing the study and design of the project on behalf of FHWA and that the preferred alternative was selected to accommodate traffic growth and the improvements to land use. MassDOT comments indicate that subsequent discussions with the Proponent have provided constructive information regarding the consistency of proposed interim improvements with proposed plans.

Revere Beach Parkway (Route 16): Revere Beach Parkway (Route 16) will also convey patrons and employees to the Project Site from the north and east. Improvements include adjustment of phasing splits and upgrades to traffic equipment at the Washington Avenue intersection and Webster Avenue/Garfield Avenue intersection. Comments from DCR request clarification of proposed signal timing adjustments.

Santilli Circle: Modifications to this signalized rotary include construction of a bridge flyover to provide free-flow direct connection from Route 16 eastbound to Route 99 Frontage Road; realign right turn from Route 16 westbound to Frontage Road to allow for merger with flyover; modify the approach from Frontage Road into the rotary to allow for two formal lanes; widen circle at Santilli Highway approach to allow for a three lane cross section; provide improved pedestrian and bicycle connection from Frontage Road to Mystic View Road; modify approach on Route 16 eastbound to allow for the addition of the flyover connection; traffic signal improvements at the signalized locations around the traffic circle; and enhance landscaping within circle.

Comments from MassDOT note the merit of the flyover from a traffic operations standpoint and identify information required to determine the feasibility of its construction, including identification of consistency with design standards and additional widening. Comments from DCR express concern with potential for queuing in the eastbound direction extending from Sweetser Overpass through Santilli Circle towards Wellington Circle. DCR also requested clarification of the 50th and 95th percentile queue lengths associated with the flyover and proposed timing adjustments.

Sweetser Circle: This rotary will serve vehicles traveling to the site from the north and east. Improvements include: reconstruct circle and approaches to function as a two-lane modern roundabout to reduce merging and diverging conflicts; reconfigure the existing northbound approach to provide a three lane cross section, providing free flow access to Route 16 eastbound; install new signage and pavement markings consistent with a modern roundabout; provide landscaping and improvements on the north side of the circle; reconstruct Lower Broadway as a 4-lane boulevard with turn lanes at major intersections; upgrade/replace/install traffic control signals; reconstruct sidewalks and bicycle lanes where required; and install street trees and lighting.

Comments from MassDOT indicate that the reduction in the number of merge and diverge movements within the rotary will improve efficiency and safety. The capacity analysis indicates that the Build-Mitigated condition would improve LOS, delay, and queue lengths. The analysis was based on the SIDRA traffic software, which is an appropriate model for roundabouts and/or traffic circles. The comments indicate that the VISSIM analysis resulted in significantly different performance measures for the same location. DCR comments indicate that the signalized crossing at the top of the on-ramp from Sweetser Overpass to Route 16 eastbound is a school crossing and, therefore, particular attention should be paid to safety at this location.

Wellington Circle: The Proponent, MassDOT, City of Everett and City of Medford acknowledge the longstanding congestion associated with Wellington Circle and its complexity. Wellington Circle processes very high volumes of traffic along two major arterial corridors. Proposed improvements include: optimization of the traffic signal timing and phasing plan and geometric improvements within the available right-of way; an additional through lane on both Route 16 approaches and widening of the Route 28 northbound approach to provide an additional left-turn lane; signal timing and phasing will be

optimized at the intersections of Harvard Street/Mystic Valley Parkway (Route 16)/Mystic Avenue (Route 38) and Mystic Valley Parkway (Route 16)/Route 16 Connector; reconstruct non-compliant sidewalks and accessible ramps around the intersection to improve pedestrian access.

The capacity analysis indicates that these improvements would generally bring LOS and delay to pre-existing conditions, although queues on some approaches would increase. Comments from MassDOT indicate that it supports the implementation of proposed improvements as interim measures and notes that a study is being considered to analyze designs to address existing deficiencies. Comments from DCR note that the system appears to be at or near the limit of at-grade solutions and that proposed improvements appear to impact existing open space and would require tree removal. Comments from MAPC and the City of Medford emphasize the importance of ensuring mitigation is completed at this location prior to site occupancy. During the review period, the Proponent indicated to MassDOT that it would contribute to the study to identify a long-term solution for Wellington Circle.

Bell Circle: The FEIR indicates that the Project adds a very small number of trips at Bell Circle. To improve operating conditions, vehicle queuing, and safety, a traffic signal timing and phasing plan is proposed. In addition, signage and pavement markings will be reviewed, upgraded, and supplemented as necessary.

Public Transit

The Project Site is located in proximity to three MBTA Orange Line stations and several MBTA bus routes. Sullivan Station is located approximately .75 miles from the site. Wellington Station and Assembly Square Station are located approximately 1.5 miles from the site. Three bus routes (104, 105 and 109) provide service along Broadway to neighborhoods of Everett, Malden and Melrose. This proximity to transit provides an important opportunity to reduce vehicle trips and minimize traffic congestion and air quality impacts. Access between the stations and the site is circuitous and lacks pedestrian and bicycle accommodations to promote walking or cycling and ensure safety. The FEIR states that the Proponent will work with the MBTA to enhance the existing bus stops on Broadway (Route 99) near the primary site driveway, which serve three existing MBTA bus routes.

The DEIR included an Orange Line capacity analysis that identified potential mitigation to improve headways from 10 minutes to 8 minutes during the off-peak hours to keep average passenger loads within the crowding standard. The FEIR analysis indicates that there ample capacity without headway improvements. The Proponent has addressed this discrepancy with MassDOT and indicated that the change in results is associated with a difference in the peak load point assumed for the Orange Line, as well as differences in load standards for core stations and non-core stations. MassDOT has requested that the FEIR include a revised analysis of projected Orange Line peak loads for weekday and weekend service days between Wellington and Back Bay Stations. If projections indicate that loading standards are exceeded, the Proponent should consult with the MBTA and MassDOT regarding financial support for increased Orange Line service and address appropriate mitigation in the FEIR.

The Proponent will offer a shuttle service between Wellington Station and the site and Malden Station and the site. The FEIR did not identify how this service schedule would align with the Orange Line schedule, the capacity of the shuttle system to accommodate both patrons and employees, or the relationship between the frequency of service and viability of the service. Subsequent to the filing of the

FEIR, the Proponent provided a preliminary comparison of shuttle service arrivals and departures relative to Orange Line service. The Proponent should continue to coordinate with MassDOT and the MBTA in determining how this service would interact with existing MBTA bus routes that stop at Wellington Station and provide comparison of shuttle service arrivals and departures relative to Orange Line service in the FEIR.

Private Bus and Shuttle Service

The FEIR indicates that private tour buses and a private shuttle service will transport groups directly to the Project Site. The shuttle (Premium Park and Ride) will provide transportation between regional parking locations (Massport Logan Express parking lots located in Braintree, Framingham, and Woburn) and the site. It will be available to patrons and employees free of charge. As noted above, a shuttle busses will operate between the site and MBTA Orange Line stations. In addition, the Proponent will operate a neighborhood shuttle service for employees. The Premium Park and Ride and the Orange line shuttles for patrons will use the primary access drive and discharge passengers at the designated bus waiting area. A building entrance will be located near the bus waiting area, providing passengers with a short, direct walkway into the arrival lobby. Employee shuttles will use the service entrance and discharge passengers at the employee entrance.

Water Transportation

The project includes incorporation of a riverwalk and dock and will provide water transportation between the site and locations in Boston Harbor and will provide transient docking. This commitment provides an excellent opportunity to restore public access to the Mystic River, in an area where little access is currently provided, and support expansion of water transportation within Boston Harbor. Many commenters express excitement about the commitment to this service and the Proponent's aggressive mode share assigned to this service.

The water shuttle service will include stops in Downtown Boston (Long Wharf or Rowe's Wharf) and South Boston (World Trade Center), with potential for expansion to other Boston Inner Harbor locations. The FEIR indicates that custom boats will be built for the service to ensure that they can pass under the Alford Street Bridge without requiring it to open and to reduce emissions of air pollutants. A water taxi and shuttle dock is proposed to support this service. Design plans for the dock were included in the FEIR.

Pedestrian and Bicycle Access

The FEIR identified measures to improve pedestrian access and safety at a number of intersections and along roadways near the project area. The FEIR proposes improvements to the existing bicycle network within the vicinity of the project including enhancements to the Lower Broadway corridor, extension of the DCR Mystic River Parkway to and through the project site, bicycle pavement markings and signage along a number of identified bicycle corridors, bicycle racks, bicycles and related equipment for employees and residents, bicycle share programs, route maps and showers and lockers for employees to further encourage walking or bicycling to and from work.

The Harborwalk will provide continuous bicycle and pedestrian access and amenities from the site to DCR's Gateway Park, which is located on the west side of the commuter rail tracks. It will also provide connections to pedestrian and bicycle facilities along Broadway (Route 99). Many comment letters identify the importance of the Harborwalk and express appreciation that it will be extended to the north to provide regional connections.

Conceptual plans and narrative included in the FEIR focus primarily on access to the the Route 99 corridor and connections to the Everett/DCR Mystic River Parkway. MassDOT comments on the DEIR requested that the Proponent expand the scope of the pedestrian improvements to include additional intersections within walking distance of the project. In particular, improvements to access between the MBTA Sullivan Square Station and the site appear warranted based on the proximity to the station. The FEIR should address comments regarding the timing and feasibility of proposed improvements, including provision of bicycle access along Route 99 through and beyond Route 16.

Parking

According to the FEIR, the project will provide 3,700 parking spaces in a structured below-grade garage on-site and 800 off-site spaces for employees. The FEIR estimates that that 71% of patrons will drive to the site and 41% of employees will drive to off-site parking facilities. The scope for the FEIR encouraged the Proponent to right-size its parking and identify opportunities for decreasing parking; however, on-site parking has been increased by 791 spaces in conjunction with an increase in gaming positions. No employee parking will be provided on-site except for a limited number of spaces for executives and disabled employees. The FEIR identifies three proposed off-site parking facility locations within the City of Malden and the City of Medford (Station Landing at Wellington Station). The FEIR states the Proponent has confirmed with the operators that sufficient capacity is available. As noted previously, an employee shuttle will be provided from the lots.

The FEIR describes the shuttle bus system that will serve employees who arrive via the Orange Line at Wellington and Malden Center stations or parked in the designated off-site employee parking areas. As requested in the DEIR certificate the FEIR describes in detail the three off-site employee parking areas will be located close to the Project Site, including Station Landing in Medford (adjacent to Wellington Station), two downtown garages in Malden, and a third, yet-to-be determined site in Everett.

Transportation Demand Management

The FEIR included a TDM Program to reduce single occupancy vehicle (SOV) trips by employees and patrons. It indicates that the Proponent will work with individual tenants to ensure they implement similar TDM strategies for their employees. A designated Transportation Coordinator will provide technical assistance to develop and implement the TDM programs and assist tenants. The Program includes the following measures:

- Coordinate with MassRIDES and Encourage Employee Use of NuRIDES- a free rewards program for individuals who take greener trips -- walking, biking, carpooling, vanpooling, or public transportation.
- Designation of an on-site Transportation Coordinator, a deliveries/loading dock manager, and a parking manager;

- Transit pass programs;
- Designation of preferential parking for carpool/vanpools and fuel efficient/alternative fuel vehicles;
- Provision of electric car charging stations in parking areas;
- Facilitation of rideshare matching for employees through staff database/software;
- Provision of parking spaces for car-sharing (i.e., Zipcar);
- Guaranteed ride home program;
- Provision of a 24-hour shuttle service to employee remote parking sites;
- Provision of shuttle service to MBTA stations and visitor and tourist locations;
- Dissemination of information that promotes use of travel alternatives;
- Monitoring of employee parking;
- Subsidized MBTA Passes (one free month Charlie Card and a 30% subsidy of monthly passes) and purchase of passes with pre-tax dollars;
- On-site sale of transit passes;
- Neighborhood Shuttle;
- Guaranteed Ride Home;
- Bicycle Commuter Facilities;
- Bicycle Sharing Station –Hubway;
- Bicycle/Pedestrian Improvements;
- Parking Management at Off-site Employee Lots; and,
- Membership in a Transportation Management Association.

MassDOT comments indicate that MassDEP, City of Boston and MAPC suggested additional TDM measures that could be evaluated. The FEIR did not provide enough detail in order to demonstrate that the project can achieve mode shares assumed to reduce site generation.

Transportation Monitoring

The FEIR included a commitment to a comprehensive traffic monitoring program that would be initiated upon site occupancy and extend for five years after full occupancy. The program will monitor traffic generation and mode share to evaluate the effectiveness of roadway mitigation and the TDM Program. An annual report will be provided to MassDOT within three months after the completion of the data collection effort for the preceding study period. The report will be used to 1) evaluate the Project with respect to the projected and actual measured impact of the Project on the transportation infrastructure and 2) allow for informed decisions with respect to additional measures (if any) that may need to be undertaken.

Implementation of the TDM Program and monitoring of traffic generation and mode share are particularly important for this Project because trip generation rates and assessment of traffic impacts are based on relatively high mode shares because of its urban location and the Proponent's commitment to promote alternative transportation. The FEIR indicates that 71% of patrons will arrive by automobile or taxi and 29% will arrive by other modes. For employees, 41% are projected to arrive by automobile and the goal is for 59% to arrive via non-automobile modes and the remaining.

MassDOT comments indicate its comfort with identified mode share goals. Comments also indicate that if monitoring demonstrates that proposed mitigation is not effective in accommodating the

future traffic volumes at key area intersections impacting the state highway system, the Proponent will be responsible for identifying and implementing additional operational improvements at these constrained locations. The monitoring program will provide an opportunity for the Proponent and/or MassDOT to implement appropriate improvements or adjustments to traffic signal timing and phasing modifications, optimization of the coordinated/interconnected signal system, and/or further refinement of the TDM program to reduce site trip generation. Comments from the City of Medford identify several suggestions regarding locations for monitoring to enhance the effectiveness of the program.

Airspace/Aviation

The site is located within protected airport approach and/or transitional airspace areas as defined by state law (MGL, Chapter 90, Section 35B) and Federal regulations (Federal Aviation Regulation Part 77, Objects Affecting Navigable Airspace). State and federal notice is required for proposed buildings, parking lots/structures, lighting (within parking lot, street lights/traffic lights, temporary lighting during construction) and use of cranes.

Because the hotel building exceeds 200 feet in height above ground level, notice to the Federal Aviation Administration (FAA) and notice to the Massachusetts Aeronautics Division is required. The project will require a FAA Air Navigation permit for the casino building and construction cranes. The project also requires notice to the MassDOT's Aeronautics Division using MAC Form E-10, Aeronautics Commission Request for Airspace Review, pursuant to 780 CMR 111.7. The FEIR indicates that the Proponent will complete and submit this notification and will coordinate with the Aeronautics Division regarding further project planning.

The FEIR included a summary of an Aeronautical Impact Statement (AIS) which addresses operations at Logan Airport, including instrument and visual approach procedures, departure procedures, and potential for electromagnetic interference with air navigation facilities. Based on this report, the FEIR indicated that the Project is not expected to adversely impact any aviation interests or operations. Massport did not request additional information regarding aviation issues.

Greenhouse Gas Emissions

The FEIR identified the Proponent's commitment to sustainability and included four over-arching objectives:

- Design of a building that will be LEED certified, at a rating of Gold or higher.
- Reduction of GHG emissions through a targeted program.
- Reduction in water and electricity consumption below existing Code requirements.
- Plan for and identify potential effects of sea level rise.

The FEIR included a revised GHG analysis consistent with the MEPA GHG Policy. The Policy requires projects to quantify carbon dioxide (CO₂) emissions and identify measures to avoid, minimize or mitigate such emissions. The analysis quantifies the direct and indirect CO₂ emissions associated with the project's energy use (stationary sources) and transportation-related emissions (mobile sources). The GHG analysis evaluated CO₂ emissions for two alternatives as required by the Policy including: 1) the Base Case corresponding to the 8th Edition of the MA Building Code that includes the 2009

International Energy Conservation Code (IECC)¹ with MA amendments, and 2) the Mitigation Alternative, which includes all energy saving measures.

The City of Everett has adopted the Energy Stretch Code (Stretch Code) subsequent to its designation as a Green Community under the provisions of the *Green Communities Act of 2008*. Therefore, the project will be required to meet the applicable version of the Stretch Code in effect at the time of construction. The Stretch Code increases the energy efficiency code requirements for new construction (both residential and commercial) and for major residential renovations or additions in municipalities that adopt it. A revised Stretch Code is expected to require energy use in new large buildings to be 12 to 15 percent below the baseline of IECC 2012. While information provided in the FEIR is consistent with the GHG policy (i.e., using the Building Code in effect at the time of the ENF filing), I strongly encourage the Proponent to revise its model based on the 2010 ASHRAE 90.1 to demonstrate compliance with the current 2012 IECC Code and the potential revisions to the Stretch Code. Revising the analysis will provide a realistic assessment of potential GHG reductions in comparison to applicable Code requirements and assist in identifying practicable and meaningful mitigation measures to meet the Proponent's stated sustainability goals and objectives. The Proponent should review DOER and MassDEP comments for recommendations on how to further reduce energy demand and associated GHG emissions. 3

The revisions to the GHG analysis included in the FEIR since the DEIR include:

- The analysis of low-energy electronic gaming machines (EGMs) has been updated and a specific energy reduction goal set.
- The latest version of the eQUEST model (version 3.65) was used to update the energy use calculations, along with small revisions to the building program.
- Updated CO₂ emission factors for electricity and natural gas have been incorporated into the emission calculations.
- A solar glare analysis was added.
- Details on the calculations of energy use for parking garage ventilation, potable water and wastewater treatment, as requested by MassDEP, have been added to the report.

The FEIR included a summary of modeling inputs (e.g., R-values, U-values, efficiencies, lighting power density, etc.) for energy efficiency measures modeled such as equipment, walls, ceilings, windows, lighting, HVAC units, etc. for both the Baseline and Mitigation Alternative based upon the conceptual design for the casino facility (podium) and hotel tower. These two structures were modeled separately.

The Project will include the following measures to improve energy efficiency:

- Cool roofs (high albedo);
- Central chiller plant with better efficiency than Code;
- Demand Control Ventilation (DCV) for the casino, entertainment, and retail areas;
- Energy Recovery Ventilation (ERV) to reduce chiller energy use;
- Building envelopes with roof and window insulation better than Code (R24, U 0.45);

¹ At the time of the filing of this FEIR, the building code is the Massachusetts Building Code 8th edition, which incorporates the building energy provisions of the IECC 2009. However, the IECC 2012 became effective on July 1, 2014.

- Skylights over the entry atrium and along the retail promenade with daylighting controls;
- Lower light power density 20% better than Code;
- Low-energy Electronic Gaming Machines (EGMs) for at least 80% of the EGMs installed in the casino;
- High efficiency elevators with regenerative VVVF drives and LED lights;
- Demand Control Exhaust Ventilation (DCEV) with variable frequency drive (VFD) fans for enclosed parking structures and metal halide lighting for all parking structures;
- Kitchen and restaurant refrigeration design to reduce energy use;
- Energy STAR appliances;
- Enhanced building commissioning;
- Occupancy controls for non-occupied or infrequently occupied spaces;

A feasibility study for on-site anaerobic digestion (AD) was included in the FEIR. The project will generate approximately 5.4 tons of food waste per week, or approximately 0.8 tons per day. The Proponent has determined that an on-site AD plant is not feasible based on technical issues and cost. The Project will seek a long-term contract for off-site anaerobic digestion of food waste.

Efforts to incorporate renewable energy into the project include:

- Photovoltaic (PV) system on the podium building roof to provide approximately 3% of the Project's annual electrical consumption;
- Purchase of approximately 7% of the Project's annual electrical consumption from local service providers of Green Power; and
- Cogeneration plant (CHP) using a 1 megawatt (MW) micro-turbine, providing approximately 20% of the Project's annual electrical demand. The cogeneration plant is capable of providing 6,307 MWhr/year of on-site electrical generation, supporting 780 tons of absorption cooling, and providing up to 50 percent of the Project's annual heating and hot water needs.

Consistent with the Policy and subsequent to consultation with the Department of Energy Resources (DOER), the FEIR modeled potential stationary source GHG reductions for the Baseline and Mitigation Alternatives. To reflect the net benefit of the CHP system, the analysis included data for both a project with and without the proposed CHP system. Because the CHP system will generate electricity that would otherwise be generated off-site, the FEIR included site/source energy conversion factors to accurately assess estimated energy use and related CO₂ emissions. The Proponent has conducted this analysis and comments from DOER indicate that it accepts the method and the results.

The PV system and the 1 MW micro-turbine cogeneration plant together are estimated to reduce CO₂ emissions by 546 tons/year, an additional 3% reduction from Base Case CO₂ emissions. This will achieve a significant level of energy reduction while creating a very high degree of energy resiliency. Comments from MassDEP offer technical assistance regarding efficient sizing of the CHP.

The FEIR also examined the electrical load attributable to gaming machines, the potential GHG emission reductions achievable through the purchase of low-energy machines, and the Proponent's commitment to purchasing energy-efficient gaming machines. In response to Massport's concern's the FEIR also examined the solar glare analysis for operations at Logan international Airport.

The GHG analysis compared the Mitigation Alternative with annual CO₂ emissions for a baseline, defined by the 8th edition of the MA Building Code, (including the 2009 IECC with MA amendments). Supporting data and graphic simulation output reports were provided in Appendix F. The GHG evaluation concludes that with energy efficiency measures and transportation demand management techniques, the mitigation alternative would reduce CO₂ emissions from stationary sources by about 30.2 percent, (a reduction of 5,744.7 tpy), and mobile sources by about 13 percent (a reduction of 358.6 tpy) for an overall GHG emissions reduction of 28 percent (a reduction of 6,103.3 tpy).

In response to the MassDEP comments on the DEIR requesting consideration of off-site mitigation of GHG emissions, the FEIR reported that the Proponent's financial commitments to the host municipality could be used to support adoption of municipal energy efficiency measures, if the community chose to do so. As it is unclear how this would be accomplished, MassDEP asks for the Proponent to collaborate with the City of Everett and the Everett Citizens Foundation on this issue. I note that this may be an appropriate use of funds available through the Community Mitigation Fund.

The FEIR presents a more detailed and expanded network of employee and patron shuttles. It is unclear whether mobile source emissions included emissions associated with these sources. The FEIR 4 should clarify this issue and, if appropriate, include these sources in the mobile source analysis.

At the completion of construction, the Proponent has committed to provide a certification to the MEPA Office, signed by an appropriate professional (e.g., engineer, architect, transportation planner, general contractor) indicating that the all of the mitigation measures proposed in the Mitigation Alternative have been incorporated into the project. Alternatively, the Proponent may certify that equivalent emissions reduction measures that collectively are designed to reduce GHG emissions by the same percentage as the measures outlined in the Mitigation Alternative, based on the same modeling assumptions, have been adopted. This certification should be supported by plans that clearly illustrate where GHG mitigation measures have been incorporated. For those measures that are operational in nature (i.e. TDM) the Proponent should provide an updated plan identifying the measures, the schedule for implementation and how progress towards achieving the measures will be obtained.

Adaptation

The FEIR included an assessment of the reasonably foreseeable impacts of climate related sea level rise, increased frequency and intensity of precipitation events and extreme heat events on the project site. During the preparation of the FEIR, Draft Preliminary Flood Insurance Rate maps (FIRM) were released for the adjacent areas of Suffolk County. New maps have not been proposed for the Project Site. For the purposes of a conservative analysis, the FEIR used the draft FIRM for Suffolk County² and the highest scenario from the Boston Harbor Association (TBHA) *Preparing for the Rising Tide* report for an assessment of sea level rise impacts on the project site. These FIRMs propose an increase by one foot to elevation 10 feet (NAVD) during the 100-year storm event. The TBHA highest scenario projects sea level rise of 7.5 feet above current high water, which is elevation 12.35 (NAVD88).

² The draft FIRM for the applicable Middlesex County Panel has not been released prior to the FEIR. The Suffolk County Panel was used instead.

All habitable floors will be elevated to 7.5 feet above current high water elevation (elevation 12.35 NAVD88). The lowest floor and the retail wing on the peninsula will be elevated to 12.35 feet, or approximately two feet above the estimated 100-year flood elevation. The main building, including the hotel and gaming facilities will be elevated to 18.35 feet, approximately eight feet higher than the estimated 100-year flood elevation. Parking garage entrances and other openings into below grade spaces will be elevated above this level as well, or sufficiently flood proofed to avoid inundation from coastal storms.

The FEIR referenced the Boston Society of Architects (BSA) study on best practices for climate change adaptation and resilience; *Building Resilience in Boston* (July 2013). The Proponent intends to use the BSA study to guide design and operations. Adaptation and resiliency measures may include: rain gardens and swales; flood-proof construction; elevation of structures above design flood elevations; prevention of water infiltration; protection for service equipment (HVAC, electrical, fuel, water, sewage); installation of back-water flow valves and sump pumps; protection of entrances from snow and ice; enhanced building insulation; cool/green roofing; resilient back-up power and systems; backup power sources for elevators; insulation of refrigeration equipment; and, elevation of utility hook-ups, mechanical devices, electrical service panel, water heaters, and IT services above potential flood levels.

Air Quality

The FEIR included the results of a revised air quality analysis conducted to determine the impact of pollutant emissions from combustion and mobile source emissions generated by the Project. The DEIR included both a microscale analysis to evaluate the potential air quality impacts of carbon monoxide (CO) due to traffic flow in the project area and a mesoscale analysis to assess the net increase in ozone (O₃) precursor pollutant emissions as a result of increased traffic. The mesoscale analysis is required to ensure that the proposed project will not adversely impact the existing State Implementation Plan (SIP) to achieve and maintain compliance with the National Ambient Air Quality Standards (NAAQS). The DEIR included the results of an EPA-approved air dispersion model that estimated project-generated ambient concentrations for nitrogen oxides (NO_x), particulate matter (PM₁₀ and PM_{2.5}), and sulfur dioxide (SO₂), in addition to CO.

Since the DEIR, the mesoscale analysis was revised in two ways: (1) Vehicle idling emissions at key intersections are included in the emission totals and the benefits of roadway/traffic signal improvements described in the transportation mitigation plan are quantified; and (2) Revised traffic projections for the year 2023 were used in the analysis.

Mesoscale emissions of volatile organic compounds (VOC) and nitrogen oxides (NO_x) were calculated for four scenarios in the FEIR: 2013 Existing, 2023 No-Build, 2023 Build, and 2023 Build with Mitigation. This analysis uses the EPA MOBILE6.2 Mobile Source Emission Factor Model and follows a protocol that was approved by MassDEP.

The 2013 Existing VOC mesoscale emissions over the study area are 60.5 kg/day. The mesoscale emissions of VOC for the 2023 No-Build case are predicted to be 74.3 kg/day. This is a 22.9% increase from the existing mesoscale VOC emissions. The mesoscale emissions of VOC for the 2023 Build case are predicted to be 84.3 kg/day. The 2013 Existing NO_x mesoscale emissions over the study area are 68.1 kg/day. The mesoscale emissions of NO_x for the 2023 No-Build case are predicted to be 36.8

kg/day. This is a 46.1% decrease from the existing mesoscale NO_x emissions. The mesoscale emissions of NO_x for the 2023 Build case are predicted to be 40.6 kg/day.

While both VOC and NO_x emission rates decline from 2013 to 2023, the mesoscale analysis results listed above reveal that project area VOC emissions for the 2023 No-Build case will increase by 22.9% from 2013 Existing values, while project area NO_x emissions for the 2023 No-Build case will decrease by 46.1%. This is due to the interplay between two effects: (1) No-Build condition traffic volumes and idling times at intersections in the project area will increase in the ten years from 2013 to 2023; and (2) In this same ten year period, the NO_x emissions from a single vehicle will decline more than twice as much on a percentage basis as the VOC emissions. The decline in the NO_x emission rate is greater than the growth in traffic volumes/idling times and thus the mesoscale emissions for NO_x decrease from 2013 to 2023 for the No-Build case. The decline in the VOC emission rate, however, is less than the growth in traffic volumes/idling times and as a result the mesoscale emissions for VOC increase from 2013 to 2023.

The mesoscale analysis results show that the VOC emissions for the 2023 Build are predicted to be 84.3 kg/day, 13.5% higher than those for the 2023 No-Build case. The VOC emissions from Project-related trips are 10.0 kg/day. NO_x emissions for the 2023 Build case are predicted to be 40.6 kg/day, 10.3% higher than those for the 2023 No-Build case.

The FEIR states that the Project will mitigate potential air quality impacts by implementing roadway/traffic signal improvements at certain intersections, to reduce vehicle idling times and emissions, and by implementing a number of TDM strategies to reduce vehicle trips and emissions for the 2023 Build case. The VOC and NO_x emissions from project-related traffic for the 2023 Build with Mitigation case are 8.0 kg/day and 3.1 kg/day, respectively. The combined effect of reduced vehicle idling from intersection improvements and reduced trips from TDM measures will reduce project-related VOC and NO_x emissions in 2023 by 20.0% and 18.4%, respectively. TDM measures alone reduce emissions 2%.

Wetlands and Water Quality

Remediation and development of this site will include temporary and permanent impacts to wetland resource areas as well as restoration of degraded resource areas. The DEIR included a description of wetland resource areas and plans, as delineated and defined in accordance with the Massachusetts Wetlands Protection Act (WPA), Sections 401/404 of the U.S. Clean Water Act (CWA), and the local wetland ordinance in the City of Everett. The project will require an Order of Conditions from the Everett Conservation Commission, which will assess the project's consistency with the Wetlands Regulations (310 CMR 10.00) and associated performance standards, including stormwater management standards. In addition, the project will require a 401 WQC from MassDEP.

The site is located within and adjacent to the tidally-affected portions of the Mystic River below the Amelia Earhart Dam. Resource areas include Land Under the Ocean (LUO), Coastal Beach and Tidal Flats, Coastal Bank, Land Containing Shellfish, Salt Marsh, Riverfront Area (RA), and Land Subject to Coastal Storm Flowage (LSCSF). The buffer zone extends 100 feet inland from the Coastal Bank resource area. Wetland resource areas are also associated with the traffic improvements at Santilli Circle and the extension of the harborwalk to the north. Inland wetland resources in the area of the off-

site improvements, specifically in association with the traffic improvements at Santilli Circle; and the pedestrian connection to the DCR Gateway Park in the areas above the Amelia Earhart Dam. These areas extend upgradient of the Amelia Earhart Dam and include: Bordering Vegetated Wetland (BVW), Bank, Land Under Water and Riverfront Area.

Approximately half of the upland portion of the site was created through filling salt marsh and tidal creeks. Two small residual or redeveloping areas of salt marsh are located along the southern edge of the site. Coastal Beach extends along the entire length of water-facing slopes and structures near the water's edge, comprising approximately 1,600 linear feet (lf). The top of the Coastal Bank follows the top of the slope above the Coastal Beach and the existing seawall. The location of LSCSF was determined based on the FEMA FIRM which identifies the 100-year floodplain (Zone AE) as a base flood elevation of 9 feet. The RA parallels the mean annual high-water line along the tidal Mystic River.

The project includes salt marsh restoration consisting of removal of unsuitable soils, mixed invasive and early successional vegetation, and debris, clean fill and re-vegetation. A reinforced stone sill will be installed on the water side of the marsh to preserve and stabilize the area for planting and help prevent loss from future episodic storm flow events.

Wetlands impacts have changed since the review of the DEIR. The on-site impacts changes correspond to the removal and replacement of a deteriorated timber bulkhead and the addition of a pier and walkway that would alter coastal bank. Total impacts to wetland resource areas include: 41,080 sf LUO, 30,310 sf of coastal beach/tidal flat and land containing shellfish, 7,455 sf of Coastal Bank alteration, 18,010 sf of LSCSF, and 12,190 sf of RA.

Off-site alteration of wetland resource areas will result from implementing roadway mitigation measures for project-related traffic impacts. Traffic improvements at Santilli Circle are expected to impact about 5,000 sf of RA, and a proposed pedestrian connection to DCR Gateway Park would alter 17,050 sf of LSCSF, 10,550 sf of RA and 21,300 sf of buffer zone. A BVW replication area is proposed between the eastbound and westbound lanes near Santilli Circle.

Activities that will be considered in the 401 process will include dredging, placement of fill, bulkhead replacement/construction, pile installation for walkway and dock support and mitigation activities (i.e., salt marsh restoration, shellfish beds).

The proposed mitigation measures for these impacts to LUO, coastal beach/tidal flats, and land containing shellfish will include 15,000 sf of resource area to recreate oyster beds and the seeding of another 15,000 sf of resource area to restore soft-shell clam flats. In addition, the project proposes 10,900 sf of new salt marsh and 12,080 sf of restored/relocated Coastal Bank for a total of 22,980 sf. MassDEP's comments provide suggestions on how the substrate could be amended to support the salt marsh restoration. I encourage the Proponent to consult with MassDEP, DMF and the Massachusetts Oyster Project regarding subsequent design.

Dredging

Dredging is proposed to support a floating dock system that provides ample draft for water transportation and recreation vessels. The majority of the proposed dredge footprint lies within the historic channel alignment and its associated side slopes. Based on the size of the proposed floating dock system and the drafts of the anticipated transportation and recreational vessels that will be using the channel, it was concluded that a dredge depth of approximately six feet below MLW would be sufficient.

The FEIR indicated that dredging is proposed within an existing channel that was previously dredged to maintain depths and should be considered maintenance dredging pursuant to 310 CMR 10.24(7)(c)(2). In addition, it indicated that dredging could be managed in compliance with the limited project provision for remediation (310 CMR 10.24(7)(c)(6)). As designed, the project will impact 41,080 sf of LUW, 2,840 sf of Coastal Beach, and 2,310 sf of Coastal Bank. The project includes maintenance dredging of an existing channel of 12,700 cy (sub-tidal and intertidal) of material to -6ft MLW, (with a one foot over-dredge) within the embayment of the project site.

The FEIR described hydraulic and mechanical methods of dredging. It indicated that mechanical methods have been selected because they result in less turbidity and disturbance. The FEIR indicated that dredging will be scheduled consistent with Time of Year (TOY) restrictions to protect for diadromous fish species that utilize the Mystic River. Dredged material consists of silty material with little to fine sands. The FEIR reports that the sediment to be dredged are too contaminated to be reused at a landfill. Accordingly, the plan is to dredge the material mechanically for dewatering on a scow. From the scow, the material will be transported for dewatering off-site. Dredged material will be disposed at an authorized upland disposal site in accordance with 314 CMR 9.00. MassDEP states in its comments that the project complies with the standards for dredging and dredge material disposal pursuant to 310 CMR 9.40.

Waterways/Chapter 91

The site is comprised of flowed tidelands, filled (formerly flowed) tidelands, and non-jurisdictional upland within Everett. Of the approximately 33.9 acre site, approximately 8.3 acres are flowed tidelands (below MHW), 10.63 acres are filled tidelands, and 14.97 acres are non-jurisdictional upland. On July 29, 2013, MassDEP issued a determination concluding that approximately half of the upland areas of the site are private tidelands and half is non-jurisdictional uplands. A small portion of the south side of the site is located within flowed Commonwealth tidelands. However no work, fill, or structures are proposed in this area. The FEIR states that approximately 15,000 sf of the Commonwealth Tidelands area within the project site will be utilized for shellfish and oyster restoration. This activity is not subject to the provisions of 310 CMR 9.53 and will not require compensation for interference with Public Rights in Commonwealth Tidelands pursuant to 310 CMR 9.35(4).

Most of the retail and restaurant space, and approximately 1/3 of the hotel is within jurisdiction; the remaining portion of the hotel, gaming area, some entertainment space and the parking garage are not within jurisdiction. Approximately 6.26 acres of open space will be located within jurisdiction, including the waterfront promenade, a harborwalk, a gazebo and a large landscaped area at the southern end of the peninsula. The project is considered a nonwater-dependent use (310 CMR 9.12) because it includes nonwater-dependent uses (hotel, casino and mixed-use commercial development) and water-dependent uses (public waterfront open space and dock facilities).

The City of Everett's Central Waterfront Municipal Harbor Plan (MHP) was approved on February 10, 2014. The MHP establishes enhanced and/or alternative standards for waterfront development, access and amenities that are tailored to Everett's specific planning objectives for this area. The MHP includes substitutions for the water-dependent use zone (WDUZ), building height and lot coverage. It allows the reconfiguration of the WDUZ with no net loss of area. It decreased the maximum allowable heights to 55 feet in Zone A, the peninsula portion of the site, and increased the maximum allowable heights to 400 feet in Zone B. The height substitution includes an offset of one new/additional square foot of open space in the MHP area for every square foot of net new shadow. In addition, it allows lot coverage up to 60% with a priority offset of an open space connection between the development site and Gateway Park, and an alternative menu of offsets that include a kayak/canoe launch, fishing pier and walking/bicycle paths.

The FEIR described the public benefits and water-dependent uses that the project will provide including: high quality open space along the Mystic River including a continuous harborwalk along the waterfront; Facilities of Public Accommodation (FPA) on 100% of the ground floor; a water transportation dock; and, extension of the riverwalk from DCR Gateway Park. The extension of the existing waterfront trail and creation of pedestrian and bicycle connections between the site and Gateway Park will include the construction and maintenance of an open space connection under the MBTA tracks. This connection will restore public access to the site, expand public access along the Mystic River to the north, and will support pedestrian access from Wellington Station and pedestrian and bicycle access from other points north.

Comments on the FEIR acknowledge and emphasize the public benefits and public access that will be provided as part of this development. Comments also indicate that the proposed connections to adjacent properties will serve to open a truly significant urban waterfront walkway system in an area that has been historically cut off from the waterfront by industrial and infrastructure uses.

The FEIR included an updated shadow study. The Shadow Study compared the shadow impacts of the Project to a c.91 compliant project during three times (9 am, Noon, and 3 pm) on October 23 (a date where pedestrian traffic is still high). The study indicated that the hotel tower results in no net increase in shadow within c.91 jurisdiction either on or off the Project Site. The FEIR also included an updated wind study to include the current building footprint and heights and was conducted in the same manner using computational fluid dynamics (CFD) modeling techniques. The updated Pedestrian Wind Assessment found that, aerodynamically, the hotel shape and orientation works well to redirect a majority of the prevailing winter winds from the west-northwest and northwest along the casino roof, with some directed above and through the entry portico. Some accelerated wind activity was predicted at grade in a region south east of the hotel tower near a café. The CFD wind analysis indicated that the wind safety criterion was met around the Project site. The Everett MHP requires that if there are additional net new wind impacts adversely affecting the water-dependent and/or public benefit activity at ground level within jurisdiction as a result of increased building height, design modifications should be made to the buildings to mitigate impacts. Since there are no net new impacts, no mitigation will be required.

The FEIR indicates that the Project, as designed, will conform to the requirements of 310 CMR 9.00 as modified through the approved Everett MHP by providing;

- Approximately two acres more open space than required by c.91,
- High quality open space with the goal of enhancing public access, including outdoor gathering areas, gazebos, and landscaped areas,
- Over 190,000 square feet of FPAs to provide destinations and activation of the Project Site,
- Approximately twice the length of harborwalk required under the regulations by extending the harborwalk to the north,
- Restoration of shoreline vegetation, salt marsh, as well as soft shell clam and oyster bed restoration, and
- A public docking facility for passenger boarding and disembarking from water taxis and shuttles.

Stormwater

The FEIR described the proposed stormwater management system, provided supporting data, calculations and drainage plans to demonstrate consistency with the Stormwater Management Standards. The FEIR indicated that the proposed system will be designed to meet and exceed the stormwater management standards and the City of Everett's stormwater requirements.

The stormwater system design will capture and treat one inch of runoff. Pretreatment of the storm water runoff also has been designed to capture at least 44 percent of the total suspended solids (TSS) in advance of the bioretention basin, in the event that groundwater recharge is feasible. The Proponent is seeking a waiver from the Storm water Management Standard 2 requirement to provide control for the peak rate of runoff. The FEIR has provided additional information in support of that waiver request. It will include pavement sweeping, deep sump catch basins, and hydrodynamic stormwater and stormwater media filters for water quality.

Portions of the Project Site which currently drain into the MBTA 36-inch storm drain under existing conditions will be re-directed to the Project's stormwater management system. The MBTA storm drain will be relocated. Three outfalls will discharge to the Mystic River (two proposed and one existing). An existing outfall will be rebuilt and relocated slightly as part of the proposed reconstructed bulkhead. Each outfall will be fitted with tide gates and discharge through a riprap apron, stone revetment and/or other energy dissipation device to control velocities and deter erosion.

Stormwater runoff from the entry drive will be directed to tree box filters, which will be lined and equipped with subdrains to convey the treated stormwater from the majority of the entry drive to a bioretention area located between the entry drive and the Mystic River. The substantial majority of impervious area on the redeveloped Project Site will be rooftop area, which is expected to generate stormwater runoff with lower levels of TSS than would be generated by parking lots and driveways. Nevertheless, the proposed stormwater management system incorporates measures that will treat all rooftop runoff prior to its discharge to the proposed new outfalls.

The FEIR also describes the stormwater management system associated with off-site improvements. The FEIR indicates that these systems will be designed to comply with the requirements and guidelines of the MassDOT's Project Development and Design Guidebook (2006), and MassDOT's Stormwater Handbook for Highways and Bridges (2004).

Massachusetts Contingency Plan

The FEIR provided a description of the site, environmental assessments, identification of contaminants and the status of various response actions. It indicated that the contamination will be addressed, in compliance with all applicable laws and regulations, to ensure the property is safe for all proposed uses. The FEIR described how the Proponent will implement remediation of the existing environmental contamination in accordance with the Massachusetts Contingency Plan (MCP). The Project's cleanup activities will address historic releases of oil and hazardous materials in a manner that makes the Project Site safe and appropriate for all proposed hotel, casino, retail, and public waterfront recreational uses.

The approach outlined in the FEIR to address contamination within the proposed project area includes the excavation and off-site disposal of a large volume of soil, soil stabilization, the treatment of contaminated groundwater and subsequent discharge during construction-related dewatering activities, dredging of contaminated sediments, and the placement of clean soil over areas of contaminated soil. The proposed activities described in the FEIR will result in the removal of significant quantities of contaminants and substantially improve environmental conditions at the disposal site. MassDEP's comments state that the FEIR approach has adequately addressed the concerns raised by MassDEP identified in the review of the DEIR.

The FEIR describes the MCP and describes the procedures and requirements for addressing hazardous waste disposal sites. The MCP lays out a detailed process on when and how contaminated sites must be assessed and cleaned up, including provisions for notification, preliminary response and risk reduction measures, site classification, characterization and risk assessment, and closure.

A Notification of Delay was filed with MassDEP, requesting that the deadline for the Phase III – Remedial Action Plan (RAP) be extended from February 2013 to June 2013, and that the deadline for the Phase IV – Remedy Implementation Plan (RIP) be extended from February 2014 to June 2014. On June 6, 2014 the current owner entered into an Administrative Consent Order (ACO) with MassDEP to extend the MCP deadline further.

Investigations at the project site have identified contamination in soil, groundwater, and nearshore sediments, including metals, VOCs, volatile petroleum hydrocarbon (VPH) fractions and target analytes, semi-volatile organic compounds (SVOCs), extractable petroleum hydrocarbon (EPH) fractions and target analytes, and polychlorinated biphenyls (PCBs). The sources of contamination include past industrial operations, leakage from a former above-ground storage tank (AST), and the placement of contaminated fill. MCP Upper Concentration Limits (UCLs) for arsenic and lead were exceeded in several soil samples. UCLs for extractable petroleum hydrocarbons (EPH) were exceeded in samples from one boring (RIZ-4) in the central portion of the site. Visual and olfactory evidence of contamination in soil generally consisted of fill containing wood, brick, glass, ash, asphalt and solid tar-like material; strong odors (including petroleum-like, coal tar-like or creosote-like odors); and unnaturally colored soils (red, green, maroon, yellow or white). Red and green colors observed in the soil may be related to the prior storage of sulfur and production of sulfuric acid at the site. Dissolved metals contamination in shallow groundwater is also present across the site, with concentrations of dissolved arsenic and lead in groundwater exceeding the UCL in groundwater samples obtained from several wells. The highest concentrations of lead in groundwater were measured in monitoring wells located on the southwestern portion of the site, corresponding to areas with low groundwater pH. The

pH of groundwater in this area of the site has been measured to be as low as 1.86. This portion of the site is associated with the historical storage and processing of ferric sulfate and sulfuric acid. Petroleum-related contamination has been identified in the central portion of the site. Elevated PAHs in soil are likely attributable to ash and cinders within the fill at the site and/or residual contamination resulting from the former storage of crude oil.

The FEIR describes that during construction, the Proponent will continue to manage soil and groundwater contamination in accordance with the provisions of the MCP, as a Release Abatement Measure (RAM) Plan filed with MassDEP. The Proponent will file documents with MassDEP providing detailed information regarding the excavation, disturbance and handling of impacted environmental media; the transport and off-site disposal of impacted soil; and provisions to control exposures to site personnel and nearby receptors. All areas of the Project Site intended to be used as open space will be capped with three feet of clean soil, so there will be no restrictions on using these areas for passive recreation activities. The FEIR also describes how contaminated soils requiring off-site disposal will be characterized, handled and transported in accordance with the MCP and other applicable federal and state laws and regulations. Following redevelopment, institutional controls in the form of one or more Activity and Use Limitations (AULs) will be put in place to limit exposure to impacted soils remaining at the Project Site after redevelopment.

The parking garage will be waterproofed and designed to resist hydrostatic (water) uplift pressures so that permanent, long term dewatering is not required. Dewatering will be required during construction. Steel sheet piling is proposed for temporary excavation support to minimize groundwater flow into the excavation area from the upper, contaminated soil zone. A Remediation General Permit (RGP) for the discharge of water pumped from the excavation will be obtained under the NPDES program. The permit will outline applicable discharge standards and the discharge monitoring required. Water pumped from the excavations during construction will be treated as required to meet discharge standards prior to discharge to surface water.

Wastewater

The FEIR states that the Project will generate an estimated 242,322 gallons per day (gpd) of wastewater, based on the flow estimates included in 310 CMR 15.203. Because of changes to MassDEP regulations, the project may not require a Sewer Connection/Extension Permit or compliance certification; however, MassDEP does retain the authority (314 CMR 7.03(3)) to require a Sewer Connection Permit if a connection could potentially cause wastewater to bypass all or portions of the treatment works.

Project wastewater will be collected through the City of Everett municipal sewer system consisting of a municipal sewer (32" x 36") located in Broadway (Rt. 99) adjacent to the site. This sewer carries a significant portion of the sewage from residential areas of Everett north of Rt. 16. This sanitary sewer continues southeasterly in Mystic Street, southwesterly in Robin Street and northwesterly in Dexter Street until it ties into the Cambridge Branch of the MWRA's Metro Sewer just downstream of the MWRA DeLauri Pump Station. The Metro Sewer continues to Chelsea Creek Headworks and then to Deer Island for treatment and discharge. A 6-inch sanitary sewer is located in Horizon Way and ties into a 10-inch sanitary sewer in Broadway, which continues southwesterly in Broadway until connecting to the the Metro Sewer, Cambridge Branch. According to the DEIR, the existing system has a flow full

capacity of approximately 5.8 million gallons per day (MGD). The project average flows would consist of approximately 4% of the pipe capacity and peak flows. Peak flows are estimated at 460,000 GPD, approximately 8% of the pipe capacity.

The FEIR includes a commitment to offset new sewer flows with removal of extraneous clean water (infiltration/inflow (I/I)) on a 4:1 basis of 4 gallons removed for every gallon generated. Based on discussions with Everett and the MWRA, the FEIR presented two alternative mitigation plans. One alternative consists of developing a standard targeted program of I/I removal within the affected sewer system either through funding for projects or for studies to examine removal opportunities. The FEIR indicated that Everett maintains a list of sewer rehabilitation projects, including for portions of the sanitary sewer in various sections of the city. This alternative would offset flows to the Deer Island WWTP and comply with MassDEP policy.

Under the provisions of the new regulations at 314 CMR 12.04(2)(d), MassDEP requires sewer authorities with permitted combined sewer overflows, and systems tributary to combined sewer overflows, which includes the City of Everett, to require the removal of four gallons of I/I for each gallon of new wastewater flows generated for any new connection where greater than 15,000 gallons per day of new wastewater flows will be generated. Accordingly, the FEIR indicates a commitment to meet the four to one I/I removal requirement, though no specific I/I removal projects have been identified in the FEIR. Wynn Everett also has included a second, alternative approach to mitigate the impacts of the new wastewater flows.

The second alternative consists of a regional mitigation approach that would divert flows from the project and flows from the City of Everett to the MWRA's North Metro Relief Sewer which has less sanitary sewer overflow (SSO) risks than the MWRA Cambridge Branch. This alternative could reduce sewer overflows into the Mystic River from the Cambridge Branch Sewer tributary area and improve water quality. Comments from MassDEP and MWRA are supportive of this alternative approach. However, MassDEP notes that this approach will not by itself serve to fully meet the requirements of the regulations I/I and that mitigation will be a necessary component to meet the regulatory requirements of 314 CMR 12.00. The Proponent should consult with the City of Everett, the MWRA, and MassDEP on this issue.

Water Supply

The maximum daily water demand for the Project is estimated to be 266,554 gpd (184 gpm). Water will be supplied by the City of Everett. Service connections in Horizon Way (6-inch, 8-inch, and 14-inch lines) connect to an existing 24-inch public water main owned in Broadway. In addition, a private 16-inch water main is located in Horizon Way to service Gateway Center. The project will include re-locating the 16-inch water line under the project buildings. The City of Everett has confirmed that adequate capacity is available to meet the project's water demand. The FEIR identified water conservation measures including low-flow fixtures.

Historic Resources

A section of Revere Beach Parkway (Rt. 16) in the project area (including the segment affected by the proposed reconstruction of Santilli Circle) and Sweetser Circle are listed in the State Register of Historic Places. According to the FEIR, the Woods Memorial Bridge, the Krystal K. Poirier Memorial

Roadway including the westbound bridge that runs over the MBTA tracks, and Sweetser Circle and its overpasses are all identified as contributing features. According to the FEIR, Santilli Circle, its East Access Ramp and the eastbound bridge over the MBTA tracks are not considered to be contributing features due to a loss of integrity following alterations.

The FEIR indicated that the project will not have any significant impact on historic resources. The FEIR indicated the project will not create new shadow that would affect historic resources listed in the Commonwealth's Inventory of Historic and Archaeological Assets. Also, it indicates that the project will not affect major sightlines to historic resources.

Construction

The FEIR describes the Project construction is expected to be completed in approximately 30 months. The entire Project is proposed to be constructed in one continuous phase to avoid the delays, costs, and environmental impacts of multiple mobilizations and demobilizations. Construction of the Project would begin late in 2014 and be completed in 2017. The FEIR states that a Construction Manager for the Project will provide a detailed Construction Management Plan prior to commencing construction on the site. The FEIR included measures that are typically employed to address construction impacts. Comments note that additional information regarding timing of proposed roadway improvements and potential conflicts between other planned projects should be identified in the FEIR.

Mitigation

The FEIR included a separate chapter summarizing proposed mitigation measures and included draft Section 61 Findings for each State Agency that will issue permits for the project. The following identifies proposed mitigation measures. It does not include a summary of transportation related mitigation; these will be identified in the Certificate on the SFEIR.

Wastewater

- Sewer improvements that remove Infiltration and Inflow (I/I) equivalent to 4 gallons removed for every gallon of new wastewater generated; or alternatively assist in modifications to regional wastewater infrastructure modifications that will reduce the incidence of CSOs into the Mystic River associated with the Cambridge Sewer Branch; and
- Grease traps and gas/oil separators will be installed.

Water Use

- Incorporates water conservation measures consistent with LEED requirements, including efficient plumbing fixtures, low-flow lavatory faucets and showerheads.
- Rainwater harvesting, grey water reuse and landscaping alternatives;
- Use timers, soil moisture indicators and rainfall sensors to reduce potable water use on landscaping;

Wetlands, Waterways and Water Quality Certificate

- Create public access and amenities to currently and historically inaccessible areas of the waterfront, including a water transportation dock and continuous harborwalk;

- Remediation, revegetation and enhancement of 550 linear feet of existing shoreline with enhanced living shoreline;
- Removal of invasive vegetation and planting of native herbaceous and shrub vegetation along part of existing Coastal Bank and Riverfront Area;
- Transformation of 10,900 +/- SF of disturbed Coastal Beach/Tidal Flats, Coastal Bank, and Riverfront Area to Salt Marsh;
- Reestablishment and restoration of soft shell clam *and* oyster beds within 30,000 +/- square feet of LUO, Coastal Beach and Tidal Flats;
- Dredging to remove contaminated sediments from the harbor bottom and to provide ample draft for water transportation, recreational vessels and a proposed floating dock;
- Debris clean up within the LUOcean, Coastal Beach and Coastal Bank resource areas;
- Replacement of existing bulkhead and construction of new bulkheads within areas of existing degraded Coastal Beach and Coastal Bank areas; and
- 100% of the ground floor will be FPAs; and
- Extension of the harborwalk off-site to the DCR Gateway Park and to Broadway including construction of a multi-use path, benches, signage, bicycle racks, plantings and lighting.

Air Quality

- Scheduling employee shifts outside of peak traffic periods;
- Carpool/vanpool matching programs;
- Dissemination of promotional materials, including newsletters about the program, available in print at the Project's on-site Transportation Resource Center, and online;
- A designated Transportation Coordinator for the Project to coordinate efforts, monitor success rates, and manage strategic implementation of traffic reduction programs;
- Access to MBTA bus stops at the primary driveway along Lower Broadway;
- Fixed-route shuttle bus service to and from the Project Site and the MBTA Orange Line stations;
- Neighborhood shuttles to connect employees to remote parking locations;
- Water shuttle service to the Project Site, including associated docks and facilities;
- A touch and go dock for transient boat access to the Project Site;
- On-site sale of Charlie Cards for employees and for guests of the resort;
- Participation in the MBTA Corporate Pass Program to the extent practical and as allowable pursuant to commercial tenant lease requirements;
- Electric vehicle charging stations within the proposed parking garage;
- Coordination with Zipcar to provide car sharing services at the Project Site;
- Preferential parking for car/vanpools and alternatively fueled vehicles; and
- Offering a "Guaranteed-Ride-Home" in case of emergency to employees that commute to the Project by means other than private automobile

Stormwater

- Green Roof
- Best Management Practices (BMPs) such as pavement sweeping, deep sump catch basins, tree box filters, filtering bioretention areas, four (4) proprietary stormwater separators, and stormwater media filters will be constructed. These BMPs will be designed to remove at least 80 percent of the average annual load of Total Suspended Solids (TSS)
- Catch basins, silt fences, hay bales and crushed stone will be used during construction to prevent sediment removal from entering runoff
- Offsite mitigation measures associated with transportation improvements may include bioretention or subsurface infiltration chambers, deep sump catch basins or proprietary stormwater separators.

GHG Emissions

- Buildings designed to be LEED-certifiable at the Gold level or higher;
- Energy efficiency measures include:
 - Cool roofs;
 - Central chiller plant with better efficiency than Code;
 - Demand Control Ventilation (DCV) for the casino, public entertainment, and retail areas;
 - Energy Recovery Ventilation (ERV) to reduce chiller energy use;
 - Building envelopes with roof and window insulation better than Code;
 - Skylights over the entry atrium and along the retail promenade (daylighting controls will be tied to this extensive system of skylights);
 - Lower light power density 20% better than Code;
 - Low-energy Electronic Gaming Machines (EGMs);
 - Metal halide lighting for all parking structures;
 - High efficiency elevators with regenerative VVVF drives and LED lights;
 - Demand Control Exhaust Ventilation (DCEV) with variable frequency drive (VFD) fans for enclosed parking structures and metal halide lighting for all parking structures;
 - Kitchen and restaurant refrigeration energy efficiency design to reduce energy use;
 - Energy-STAR appliances;
 - Enhanced building commissioning; and
 - Occupancy controls for non-occupied or infrequently occupied spaces.
- PV system on the podium building roof or other locations, and/or purchase from local service providers of Green Power of annual electric consumption equaling 10% of the Project's annual electrical consumption;
- Cogeneration plant using a nominal 1- MW microturbine, providing approximately 20% of the Project's annual electrical consumption (the cogeneration plant is capable of providing 6,307 MWhr/year of on-site electrical generation, supporting 780 tons of absorption cooling, and providing up to 50 percent of the Project's annual heating and hot water needs); and,
- Intersection improvements to reduce vehicle idling and TDM measures to reduce trips will reduce Project-related motor vehicle CO2 emissions by 13.0%.

Climate Change Adaptation and Resiliency

- Elevate proposed structures to a minimum of 3.35 feet above the 100-year flood level.
- Parking garages entrances and other openings into below grade spaces will be elevated, as noted above, or incorporate sufficient flood-proofing to avoid damage from coastal storms; and

Stormwater

- Green Roof
- Best Management Practices (BMPs) such as pavement sweeping, deep sump catch basins, tree box filters, filtering bioretention areas, four (4) proprietary stormwater separators, and stormwater media filters will be constructed. These BMPs will be designed to remove at least 80 percent of the average annual load of Total Suspended Solids (TSS)
- Catch basins, silt fences, hay bales and crushed stone will be used during construction to prevent sediment removal from entering runoff
- Offsite mitigation measures associated with transportation improvements may include bioretention or subsurface infiltration chambers, deep sump catch basins or proprietary stormwater separators.

GHG Emissions

- Buildings designed to be LEED-certifiable at the Gold level or higher;
- Energy efficiency measures include:
 - Cool roofs;
 - Central chiller plant with better efficiency than Code;
 - Demand Control Ventilation (DCV) for the casino, public entertainment, and retail areas;
 - Energy Recovery Ventilation (ERV) to reduce chiller energy use;
 - Building envelopes with roof and window insulation better than Code;
 - Skylights over the entry atrium and along the retail promenade (daylighting controls will be tied to this extensive system of skylights);
 - Lower light power density 20% better than Code;
 - Low-energy Electronic Gaming Machines (EGMs);
 - Metal halide lighting for all parking structures;
 - High efficiency elevators with regenerative VVVF drives and LED lights;
 - Demand Control Exhaust Ventilation (DCEV) with variable frequency drive (VFD) fans for enclosed parking structures and metal halide lighting for all parking structures;
 - Kitchen and restaurant refrigeration energy efficiency design to reduce energy use;
 - Energy-STAR appliances;
 - Enhanced building commissioning; and
 - Occupancy controls for non-occupied or infrequently occupied spaces.
- PV system on the podium building roof or other locations, and/or purchase from local service providers of Green Power of annual electric consumption equaling 10% of the Project's annual electrical consumption;
- Cogeneration plant using a nominal 1- MW microturbine, providing approximately 20% of the Project's annual electrical consumption (the cogeneration plant is capable of providing 6,307 MWhr/year of on-site electrical generation, supporting 780 tons of absorption cooling, and providing up to 50 percent of the Project's annual heating and hot water needs); and,
- Intersection improvements to reduce vehicle idling and TDM measures to reduce trips will reduce Project-related motor vehicle CO2 emissions by 13.0%.

Climate Change Adaptation and Resiliency

- Elevate proposed structures to a minimum of 3.35 feet above the 100-year flood level.
- Parking garages entrances and other openings into below grade spaces will be elevated, as noted above, or incorporate sufficient flood-proofing to avoid damage from coastal storms; and

- Critical infrastructure and HVAC equipment will be elevated above projected flood levels.

Conclusion

The FEIR included a detailed project description, revised site plans, identified changes to the project, summarized potential environmental impacts. It included detailed information on impacts and proposed mitigation. It included a revised traffic study, revised mitigation based on comments and the results of analysis and provided conceptual plans for proposed improvements.

I have received numerous comment letters from municipal officials, State and regional agencies, from environmental advocacy groups, from businesses, and from residents. Many comments are very supportive of the proposed project and opportunities for improving environmental site conditions. Other comments identify significant concerns with environmental and traffic impacts. The majority of comments, whether supportive of the proposed use or not, reiterate the challenge posed by existing congestion of the local and regional roadway system and the additional traffic expected to be generated by the project. Specifically, MassDOT, DCR and the City of Boston have requested a SFEIR to provide additional analysis and information to address traffic and transportation issues. The Proponent met with MassDOT and DCR to provide additional information during review of the FEIR to address identified concerns and provide clarification of certain issues. MassDOT's comment letter identifies the Proponent's efforts to address questions and concerns during the comment period and the letter identified supplemental analysis and information that was provided.

Based on review of the FEIR, consultation with State Agencies, and review of public comments, I have require the Proponent to submit a SFEIR. The Scope for the SFEIR is limited to traffic and transportation issues and a Response to Comments. The SFEIR will provide an opportunity to incorporate additional analysis and clarifications into the TIA and provide another opportunity for State Agencies, municipal officials and the public to review the information. In the event the project receives a license from MGC, the publication and review of the FEIR and associated analysis will facilitate State permitting.

SCOPE for the SFEIR

The FEIR should follow Section 11.07 of the MEPA regulations for outline and content, as modified by this scope.

Traffic and Transportation

The FEIR should include a revised and updated TIA that includes additional data, analysis, and assessment of alternatives and mitigation measures. The SFEIR should clearly identify proposed roadway improvements, supported by conceptual plans that support analysis of the feasibility of constructing or implementing proposed improvements. It should clearly demonstrate the benefits and, where appropriate, impacts to traffic operations, congestion, and safety. The SFEIR should identify a schedule for implementation, its relationship to project site occupancy, and relationship to roadway improvements planned by others. 6

I hereby incorporate by reference the MassDOT comment letter, dated August 14, 2014, and the DCR comment letter, dated August 8, 2014, into the Scope for the FEIR. Comments from MAPC, City of Everett, City of Boston, City of Medford and City of Somerville identify a number of additional areas requiring further analysis or clarification, including capacity analysis, establishment of mode share goals, enhancement of the TDM program to meet goals, additional mitigation and the establishment of a transportation monitoring program.

The Proponent should consult with MassDOT, Massport, DCR, the City of Everett and other municipalities to discuss methodology and results of the revised analysis prior to filing the SFEIR. I strongly encourage the Proponent to consult jointly with MassDOT and the City of Boston regarding the treatment of Rutherford Avenue and Sullivan Square in the SFEIR. The Proponent has proposed interim improvements in Sullivan Square which will review and approval from the City of Boston. The City has expressed serious concerns regarding the project's impact on traffic in Sullivan Square and along the Rutherford Avenue Corridor. The SFEIR should document the relationship between the project's proposed mitigation and the plans for Rutherford Avenue. It should also identify whether interim improvements in Sullivan Square would impact the feasibility or cost of proposed design of Sullivan Square. I expect the Proponent will continue to work with MassDOT, the surrounding cities, and MAPC on both short-term and long-term solutions to address the project's impacts while supporting municipal redevelopment visions, roadway design plans, and improved regional connections.

Roadway Improvements

The SFEIR should include a revised mitigation program to provide a clearer understanding of the proposed mitigation commitments, the resulting benefits to traffic operations and congestion, the timing of their implementation, and how it relates to the project site occupancy. The Proponent should also seek consensus with MassDOT, DCR, and municipalities regarding the feasibility of proposed improvements. The Proponent should meet with MassDOT and DCR prior to submission of the FEIR. Because of overlapping jurisdiction and interest in ensuring that transportation impacts are avoided and mitigated to the extent possible, I strongly encourage the Proponent, MassDOT and DCR to participate in joint meetings to address issues in a coordinated manner and seek consensus on necessary mitigation. As appropriate, joint meetings should include municipalities.

The SFEIR should clearly identify whether improvements are considered interim or long-term, identify associated timeframes, and expand the Build with Mitigation analysis. The SFEIR should include sufficiently detailed conceptual plans (preferably 80-scale) for all newly proposed roadway improvements to verify the feasibility of constructing such improvements. The conceptual plans should clearly show proposed lane widths and offsets, layout lines, road jurisdictions, and the land uses (including access drives) adjacent to areas where improvements are proposed so that the feasibility of constructing the proposed improvements can be addressed.

The SFEIR should describe methodologies for SYNCHRO, VISSIM and SIDRA modeling and include results of each. It should ensure consistency of inputs and identify and analyze any anomalies. Signal locations and intersection approach geometry (e.g., number of lanes, lane width, lane usage, etc.) should be consistent.

Transit

The SFEIR should provide detailed and direct responses to comments provided by MassDOT. 15
The Proponent should consult with MassDOT and the MBTA prior to and during the preparation of the SFEIR to ensure transit operations and capacity issues are adequately addressed.

The Proponent should consult with the MBTA regarding shuttle service, integration of bus service into the project site and opportunities for improving bus service along Route 99 in the project vicinity. It should address how proposed improvements incorporate bus service and identify the path of travel from bus stops to the site. It should present plans to demonstrate that safe and accessible pedestrian crossings and bus stops have been integrated into the design. It should provide a summary (in a tabular format) of intersections used by MBTA buses and identify where timing or turning movements could impact this service. 16 17

The SFEIR should include an assessment of how shuttle service would interact with existing MBTA bus routes in terms of berthing space and potential duplication of services. The SFEIR should provide a comparison of shuttle service arrivals and departures relative to Orange Line service and more detailed shuttle berthing plans to support a feasibility assessment and ensure conflicts with existing services are not created. The plans should address consistency with codes and standards related to the Americans with Disabilities Act (ADA), and the Massachusetts Architectural Access Board (MAAB), and the Federal Transit Administration (FTA) regulations and guidance. 18

The Proponent should provide a revised analysis of projected Orange Line peak loads for weekday and weekend service days between Wellington and Back Bay Stations. Should the projections show loading standards to be violated, the Proponent should discuss with the MBTA and MassDOT providing financial support for increased Orange Line service. 19 20

The SFEIR should provide an update on consultation with the MBTA regarding the proposed land acquisition. It should identify any changes to proposed access or circulation and identify how the MBTA operations at this facility will be supported during construction and upon occupancy of the site. 21

Parking

The Proponent should reevaluate parking demand and clarify assumptions used to determine the overall on-site parking supply, particularly in light of the increase in proposed parking. The SFEIR should reevaluate parking demand and clarify assumptions used to determine the overall on-site parking supply, particularly the source of operation capacity percentages, assumptions about patron length of stay and arrival patterns, and the requirement to achieve a desired LOS for patrons using the parking garage and surface lots. The SFEIR should address whether parking could be banked until warranted by demand. 22

Pedestrian and Bicycle Access

The conceptual plans and the discussions included in the FEIR are focused on the site, the Route 99 corridor and connections to the Everett/DCR Mystic River Parkway. Due to the proximity of the MBTA's Sullivan Square Station to the project, additional pedestrian trips between Sullivan Square and

the site are likely to increase. The SFEIR should present alternatives for pedestrian access from the site to Sullivan Square Station. I also note that the Proponent has expressed a willingness to support pedestrian access from Assembly Square and the Assembly Square Station across the Mystic River. The SFEIR should provide an update on any consultation with DCR, City of Everett and City of Somerville regarding this potential connection.

The Proponent has identified a comprehensive program for improving bicycle access to the site. Improvements to access along Route 99 and along the waterfront have been highlighted and comments are very supportive of these improvements. Comments on the FEIR state concerns about the feasibility and timing of some improvements. MassDOT comments note that proposed bike lanes along the Route 99 corridor are discontinued at Sweetser Circle. The Proponent has indicated in discussions that they would work with the City of Everett to seek an alternative connection north of Route 16. Bicycle access should be clearly described in the SFEIR and supported by plans that facilitate assessment of the feasibility of implementation.

Traffic Monitoring

The FEIR should consider comments provided on the Transportation Monitoring Program, including addition of locations and MBTA bus routes, and identify any revisions in the SFEIR. In addition, I encourage the Proponent to evaluate additional TDM measures suggested by MAPC and MassDEP. I also note MassDOT's comment indicating that, based on the size of the project, MassDOT anticipates the need to monitor and update the TDM program prior to full occupancy of the site.

Mitigation and Section 61 Findings

The SFEIR should contain revised and updated mitigation commitments. It should identify clear commitments to implement mitigation measures, estimate the individual costs of each proposed measure, identify the parties responsible for implementation, and contain a schedule for implementation, updating these elements as necessary from those presented in the FEIR. Draft Section 61 Findings for each State Agency that will issue permits for the project should be included. They should be revised to incorporate detailed commitments.

Responses to Comments

The SFEIR should contain a copy of this Certificate and a copy of each comment letter received. In order to ensure that the issues raised by commenters are addressed, the SFEIR should include direct responses to comments to the extent that they are within MEPA jurisdiction. This directive is not intended to, and shall not be construed to, enlarge the scope of the SFEIR beyond what has been expressly identified in this certificate.

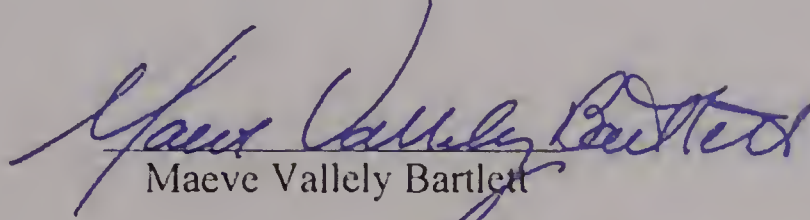
Circulation

The Proponent should circulate the SFEIR to those parties who commented on the EENF, and/or the DEIR, and/or the FEIR, to any State Agencies from which the Proponent will seek permits or approvals, and to any parties specified in section 11.16 of the MEPA regulations. To save paper and other resources, the Proponent may circulate copies of the SFEIR to commenters other than State

Agencies in CD-ROM format or post to an online website, although the Proponent should make available a reasonable number of hard copies, to accommodate those without convenient access to a computer to be distributed upon request on a first come, first served basis. The Proponent should send a letter accompanying the CD-ROM or identifying the web address of the online version of the SFEIR indicating that hard copies are available upon request, noting relevant comment deadlines, and appropriate addresses for submission of comments.

August 15, 2014

Date


Maeve Vallely Bartlett

Comments received:

08/15/2014	Massachusetts Department of Transportation
08/11/2014	The Office of Salvatore LaMattina
08/11/2014	Department of Energy Resources
08/08/2014	MassAudubon
08/08/2014	Division of Marine Fisheries
08/08/2014	DDRC Gateway LLC
08/08/2014	Office of Coastal Zone Management
08/08/2014	Metropolitan Area Planning Council
08/08/2014	The Boston Harbor Association
08/08/2014	City of Somerville Massachusetts
08/08/2014	Massachusetts Port Authority
08/08/2014	Federal Realty Investment Trust
08/08/2014	Fort Hill
08/08/2014	The Boston Harbor Association
08/08/2014	Department of Environmental Protection
08/08/2014	City of Boston Massachusetts Office of Gaming Accountability
08/08/2014	Boston Harbor Island Alliance
08/07/2014	Mystic River Watershed Association
08/07/2014	John Vitagliano
08/07/2014	Greenman- Pedersen, Inc
08/07/2014	City of Medford Office of the Mayor
08/07/2014	Massachusetts Water Resources Authority
08/07/2014	City of Everett Office of the Mayor
08/06/2014	City of Medford Office of Community Development
08/05/2014	City of Boston Massachusetts Law Department
08/05/2014	Terry Baldwin- Williams
08/05/2014	Charlestown Waterfront Coalition
08/05/2014	Charlestown Waterfront Coalition
08/04/2014	Charlestown Preservation Society Design Review Committee
08/04/2014	Liz Levin & Company Management Consulting

08/03/2014 Liz Levin & Company Management Consulting
07/31/2014 Peter Giannikopoulos

MVB/ACC/acc

August 8, 2014

Maeve Valley Bartlett, 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

Dear Secretary Valley Bartlett:

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 504 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 Draft Environmental Impact Report (DEIR), the building program has increased by approximately 419,542 square feet to a grand total of 3 million square feet. The Proponent has expanded the gaming area, which is now 192,543 square feet and is expected to include 3,200 slot machines and 160 gaming tables. The amount of on-site parking has increased by 791 spaces. Of the 4,500 spaces now in the parking program, 3,700 are on-site and 800 are off-site. The project is forecast to generate 1,385 daily vehicle trips during the Friday afternoon peak hour (4:30-5:30 PM) and daily vehicle trips will increase to 1,691 during the Saturday afternoon peak hour (2:45-3:45 PM).

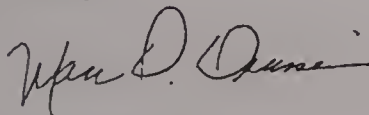
The Proponent has filed an application with the Massachusetts Gaming Commission seeking a license to operate a Category One gaming establishment at the project site. In addition, the project will require a Vehicular Access Permit from MassDOT and a Construction and Access Permit from the Department of Conservation and Recreation (DCR).

MAPC has reviewed the Final Environmental Impact Report (FEIR) and has concerns that primarily address regional traffic impacts and the need to include additional mitigation. 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 Certificate and require the Proponent to address our concerns.

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 One gaming establishment, 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 such projects and keep the Commonwealth on track in meeting its regulatory and statutory goals.

Thank you for the opportunity to comment on this project.

Sincerely,



Marc D. Draisen
Executive Director

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

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

Gaming establishments 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 for vehicular trips will be on Friday and Saturday. Of these daily vehicle trips, almost 1,385 will be generated during the Friday afternoon peak hour (4:30-5:30 PM) and will increase to over 1,691 during the Saturday afternoon peak hour (2:45-3:45 PM).

The project site is situated within an urban network of highways, major streets, and public transportation hubs. Regional vehicular access to the project site will be via Route 16, Route 99, and a network of local roadways. Public transportation is provided by the MBTA with bus, train, and commuter rail service in close proximity. The MBTA services the Route 99 corridor via bus routes and also provides transit service via the Orange Line at the nearby Wellington, Malden, and Sullivan Square stations as well as the future Assembly Station.

MAPC is pleased the Proponent has proposed an extensive shuttle bus system, water transportation, bicycle and pedestrian improvements, a robust transportation demand management (TDM) program, as well as significant roadway mitigation at many of the busiest intersections leading to the site. MAPC remains concerned that traffic congestion caused by the project will hamper long planned development in close proximity to the Everett, Charlestown, Somerville, and Medford municipal borders. While the Proponent's trip generation analysis attempts to quantify future traffic conditions, MAPC believes that the forecasted increase in vehicle trips from the proposed project and all of the combined area developments will create impacts on this region.

This concern is also reflected in the Secretary of Energy and Environmental Affairs' statement in the Certificate issued for the project's Draft Environmental Impact Report (DEIR):

I note the many comments from municipalities expressing concern with the project's traffic impacts on development and infrastructure plans underway in Boston, Somerville, and Medford. These concerns are shared by MassDOT and MAPC and I expect the Proponent will work with MassDOT, the surrounding cities, and MAPC on both short-term and long-term solutions to address the project's impacts while supporting municipal redevelopment visions, roadway design plans, and improved regional connections. (DEIR Certificate, February 21, 2014, page 28)

To date, MAPC has not been contacted by the Proponent as requested by the Secretary to discuss short – and long-term solutions addressing the project's impacts. The following are specific issues which MAPC respectfully requests 1
be incorporated as part of the issuance of the MEPA Certificate for the Final Environmental Impact Report (FEIR):

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 users of the facility, 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, reduce the number of single-occupancy vehicles (SOVs), establish better transit connections, provide private shuttle buses for patrons and employees, as well as enhance water, bicycle, and pedestrian access to the site.

The Proponent has committed to assisting with local roadway and safety improvements and has proposed a roadway mitigation program totaling \$61.6 million. These funds will contribute to the study, design, and construction of the I-93 Exit 28 off-ramp/Cambridge Street Intersection, Sullivan Square design, Route 99, Bell Circle, Santilli Circle, Sweetser Circle, and Wellington Circle.

Rutherford Avenue and Sullivan Square

Congestion at the Exit 28 ramp on I-93 and congestion through Sullivan Square are MAPC's biggest concerns in terms of traffic impacts related to I-93, a major interstate highway which serves as the main access point in and out of Boston from the north. This highway also provides access to the Sullivan Square area, and proximate major economic development sites in Somerville – Assembly Square and Inner Belt. Assembly Square is slated to become one of the state's largest mixed-use developments, centered on a new Orange Line Station, Assembly Station.

After a multi-year planning process with significant public input, the City of Boston has established a transportation and redevelopment vision for the Sullivan Square/Rutherford Avenue part of Charlestown. The vision involves scaling down traffic along Rutherford Avenue so that it becomes less of a highway and more of an urban boulevard, with dedicated bicycle and pedestrian paths adjacent to the roadway. Additionally, Sullivan Square itself will be redesigned as a gridded street network facilitating new development oriented to the Sullivan Square MBTA station. Similar to Rutherford Avenue, the goal for Sullivan Square is to create an area with less auto traffic and more walking, biking, and transit use. The plans for Sullivan Square call for new residential and commercial development that will provide much needed housing, add jobs to bolster the economy, and take advantage of the proximity of the MBTA station to encourage residents and workers to use transit rather than drive to all of their destinations.

This effort to create a "new neighborhood" in the City of Boston is highly consistent with the Commonwealth's Sustainable Development Principles, the regional plan *MetroFuture*, as well as MassDOT mode-shift goals and Green DOT programs¹. Boston's vision for Sullivan Square, which is also expected to generate numerous benefits for surrounding communities, will likely be compromised by the proposed project's increase in vehicular traffic. Specifically, 63% of all patron trips will access the site via Sullivan Square.

Due to project-generated traffic forecast to utilize this corridor, the project's traffic impacts and the vision for Rutherford Avenue and Sullivan Square contradict each other. MAPC does acknowledge that Wynn's Best and Final Offer (BAFO) to Boston includes a \$15 million contribution to implement transportation infrastructure improvements for Sullivan Square (\$1 million per year over 15 years). This contribution is in addition to the \$4.6 million in improvements it will make per MEPA requirements. However, as of this writing, an agreement has not been formalized between Wynn and the City of Boston.

While MAPC does not foresee a reasonable mitigation program that could resolve this problem adequately, there are some additional measures the Proponent could implement which may lessen the impacts. The below comments address additional bus improvements to Route 99, a strong monitoring program to ensure predicted mode share goals, and capacity improvements to the Orange Line, can help to further reduce auto trips. 2

Roadway Changes to Improve Bus Service along Route 99

The Proponent should include additional improvements to facilitate bus service as part of their existing commitments to the Route 99 corridor. Route 99 provides access to the project site, downtown Boston, and the interstate highway system.

In addition to serving as a primary access route to/from Boston, Everett, Malden, Medford, and Somerville, three MBTA lines (104, 105, and 109) traverse the Route 99 corridor in the vicinity of the proposed project site. On an average weekday, over 2,900 passengers board MBTA buses at stops along Route 99, 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 and plans to work with the MBTA to enhance the existing bus stops, additional modifications 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. Enhancing the Route 99 corridor for bus service will encourage patrons and employees accessing the project site to use this mode of transportation. 3

¹ 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.



MASSACHUSETTS WATER RESOURCES AUTHORITY

Charlestown Navy Yard
100 First Avenue, Building 39
Boston, MA 02129

Frederick A. Laskey
Executive Director

Telephone: (617) 242-6000
Fax: (617) 788-4899
TTY: (617) 788-4971

August 7, 2014

Maeve Valley Bartlett, Secretary
Executive Office of Energy and Environmental Affairs
100 Cambridge St, Suite 900
Attn: MEPA Office, Anne Canaday
Boston, MA 02114

Subject: Final Environmental Impact Report - EOEEA #15060
Wynn Everett, Everett, MA

Dear Secretary Valley Bartlett:

The Massachusetts Water Resources Authority (MWRA) is pleased to submit the following comments in response to the Final Supplemental Environmental Impact Report (FEIR) submitted by Wynn MA, LLC ("the Proponent") for Wynn Everett (the "Project"). If successful in procuring a gaming license under provisions of M.G.L Chapter 23K, the Proponent proposes to redevelop, construct and operate a Category 1 gaming establishment on the site.

As described in the FEIR, the Project calls for the creation of a casino development on an approximate 33.9 acre site located at a Mystic River waterfront site off Horizon Way and Lower Broadway (Route 99) in Everett. The proposed resort casino will include a luxury hotel, a gaming facility, retail space, six restaurants, a night club, convention and meeting space, a gym, and a four-season atrium garden. Other elements of the project include service space, a 1.25 million sq ft. parking structure, site remediation and removal of contaminated soils and clean-up and restoration, and significant transportation improvements. These transportation improvements include major off-site roadway and intersection improvements on State DOT and DCR roadways – along Route 16, including at Wellington Circle, Santilli Circle and Sweetser Circle, and along Route 99 at Sullivan Square. Improvements are also proposed in the cities of Boston and Medford to address long-standing regional traffic issues.

MWRA comments continue to focus on issues related to wastewater flows, permitting from the Toxic Reduction and Control (TRAC) Department, the need for an 8 (M) Permit/s from the Water and Wastewater Permitting Field Operations Group, and public access opportunities adjacent to the project site.

Wastewater Flows

The FEIR (Chapter 9), like the Draft Environmental Impact Report, describes two basic alternatives to mitigate the impacts of the Project's estimated wastewater flows on MWRA's sewer system and related wet weather performance conditions, including combined sewer overflow (CSO) discharges to the Mystic River. One alternative involves the removal of extraneous flow - infiltration and inflow ("I/I") - from the City of Everett's sewer system to offset the Project's flows. The other alternative involves redirecting certain City of Everett flows away from the MWRA sewer that the Proponent proposes will accept the Project's flows (MWRA "Section 24") to a larger MWRA sewer interceptor (MWRA "Section 016/017" or MWRA "Section 193"). The FEIR correctly points out that such redirection away from Section 24 can provide a level of hydraulic benefit in Section 24 and help lower surcharging of this section and upstream overflows to the Mystic River in large storms without compromising the hydraulic performance of the other MWRA sewers.

Based upon the available alternatives described in Chapter 9, MWRA is confident that, working with the Proponent and the City of Everett, additional wastewater flows generated by the project will be adequately mitigated. MWRA welcomes coordination with the Proponent in its further development of mitigation measures as well as its eventual submission of permit applications for work within MWRA easements and/or new direct connections to the MWRA system.

TRAC Discharge Permitting

As stated in earlier comments on the DEIR, MWRA prohibits the discharge of groundwater to the sanitary sewer system, pursuant to 360 C.M.R. 10.023(1) except in a combined sewer area when permitted by the Authority and the municipality. In response to this earlier comment, the Proponent responded in the Supplement DEIR that no groundwater or stormwater will be discharged to the sanitary sewer system during or after construction, and have acknowledged that they will secure a USEPA-NPDES General Permit for Storm Water Discharges from Construction Activities prior to beginning earth disturbance on the site.

Once the hotel is completed, and if the Proponent intends to operate a laundry facility on the premises, an MWRA Sewer Use Discharge Permit will be required for the discharge of laundry effluent into the sanitary sewer system. For assistance in obtaining this permit, the hotel operator should contact Keary Simmerman, Industrial Coordinator in the TRAC Department at (617) 305-5638. This permit must be issued prior to discharging laundry wastewater into the MWRA sanitary sewer system.

The Proponent must also comply with 360 C.M.R. 10.016, if gas/oil separator(s) will be installed in the parking garages. In addition to complying with 360 C.M.R. 10.000, the Proponent will need to conform to the regulations of the Board of State Examiners of Plumbers and Gas Fitters, 248 C.M.R. 2.00 (State Plumbing Code), and all other applicable laws. The installation of the proposed gas/oil separator(s) will require MWRA approval and may not be back filled until inspected and approved by the MWRA and the Local Plumbing Inspector. For

assistance in obtaining this approval, please contact Peter J. Yarossi, Regional Manager in the TRAC Department at (617) 305-5671.

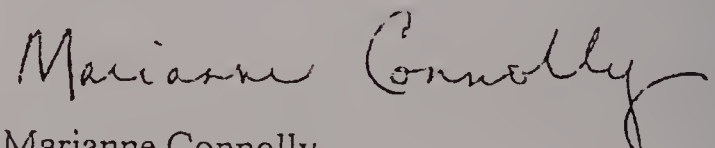
Section 8 (m) Permitting

Section 8 (m) of Chapter 372 of the Acts of 1984, MWRA's Enabling Legislation, enables the MWRA to issue permits to build, construct, excavate, or cross within or near an easement or other property interest held by the MWRA, with the goal of protecting Authority-owned infrastructure. It is likely that the Proponent will need an MWRA 8(m) permit/s for future utility, potential new connections to the MWRA sewer system, or roadway improvement work. When the proposed transportation improvements are in the design phase, we encourage the Project Proponent and/or their consultants to contact Mr. Kevin McKenna within MWRA's Wastewater Permitting Group at (617) 350-5956 and Mr. Ralph Francesconi in the Water Permitting Group at (617) 350-5827 for permitting assistance early in the process. 2

Public Access Opportunities

MWRA supports the public access plans that call for significant shoreline improvements for pedestrians at the Project site. If the Proponent's public access plan expands to include neighboring properties such as MWRA's DeLauri Pump Station located nearby in Boston adjacent to the Boston/Everett City line, MWRA would support having the Proponent provide a link along the water's edge to connect to Route 99 and eventually further south to Sullivan Square in Charlestown. Construction and maintenance of any public access walkway at the DeLauri site would be the Proponent's responsibility and will also require an 8 (m) permit. 3

Sincerely,



Marianne Connolly
Senior Program Manager,
Environmental Review and Compliance

cc: David Kubiak, MWRA Engineering and Construction
Kattia Thomas, MWRA TRAC
Kevin McKenna, MWRA Permitting, Wastewater Operations
Ralph Francesconi, MWRA Permitting, Water Operations
Kevin Brander, DEP



THE COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENERGY AND ENVIRONMENTAL AFFAIRS
OFFICE OF COASTAL ZONE MANAGEMENT
251 Causeway Street, Suite 800, Boston, MA 02114-2136
(617) 626-1200 FAX: (617) 626-1240

MEMORANDUM

TO: Maeve Valley Bartlett, Secretary, EEA
ATTN: Anne Canaday, MEPA Unit
FROM: Bruce Carlisle, Director, CZM
DATE: August 8, 2014
RE: EEA 15060– Wynn Everett

The Massachusetts Office of Coastal Zone Management (CZM) has completed its review of the above-referenced Final Environmental Impact Report (FEIR), noticed in the *Environmental Monitor* dated July 9, 2014 and recommends that the following comments be addressed through permitting.

Project Description

The project includes the construction of a resort casino on the 32 acre former Monsanto Chemical site along the Mystic River in the City of Everett. The project includes a luxury hotel, gaming areas, retail and dining, health club and spa, and conference/entertainment space. The project will also include landscaped open space, harborwalk, outdoor gathering areas, water transportation facilities, off-site transportation improvements, and open space with a harborwalk connecting the site, under the MBTA rail tracks to existing open space at Gateway Park. The proposed project includes shoreline stabilization in the form of the replacement of existing and construction of new vertical steel pile bulkhead and the placement of a new stone revetment. The project also includes dredging to accommodate vessels and the construction of a dock system for water transportation.

The Draft Environmental Impact Report (DEIR) filed in December 2013 outlined changes to the project after the Expanded Environmental Notification Form was filed. These changes included a higher hotel tower at 386 feet, a decrease in the number of hotel rooms from 551 to 500, a decrease in retail space, an increase in open space, less on-site parking, and the construction of a living shoreline of salt marsh and bank restoration along the Mystic River.

The FEIR outlines changes to the project since the DEIR, including adjustments to interior programming, the addition of a secondary access point to the site from Lower Broadway, and a reduction of parking. The FEIR states that the proposed exterior features such as open space, landscaping, Harborwalk, water transportation facility, and shoreline treatment remain the same as described in the DEIR. The FEIR includes additional details regarding the proposed water transportation facility and service from the site to Downtown Boston.

The project site consists of flowed and filled tidelands within Chapter 91 jurisdiction and is subject to the Secretary's Decision on the City of Everett's Central Waterfront Municipal Harbor Plan that was issued on February 10, 2013.



Project Comments

City of Everett Central Waterfront Municipal Harbor Plan

The Municipal Harbor Plan (MHP) Regulations (301 CMR 23.00) establish a voluntary procedure by which municipalities may obtain approval of MHPs from the Secretary, promoting long-term, comprehensive, municipally-based planning of harbors and other waterways that fully incorporate state policies governing stewardship of tidelands. Additionally, approved plans guide and assist MassDEP in making regulatory decisions, pursuant to MGL Chapter 91 and the Waterways Regulations (310 CMR 9.00), that are responsive to harbor specific conditions and other local and regional circumstances. As promulgated, the Waterways Regulations provide a uniform statewide framework for regulating tidelands projects and developments. Municipal Harbor Plans present communities with an opportunity to adopt a vision that modifies these uniform standards through the amplification of the discretionary requirements of the Waterways Regulations or through the adoption of provisions, which if approved, are intended to substitute for the minimum use limitations or numerical standards of 310 CMR 9.00.

The City of Everett submitted an MHP for their Central Waterfront for review and approval according to 301 CMR 23.00 in October 2013. As noted in the FEIR, the Secretary issued a Decision on the City of Everett Central Waterfront MHP ("Decision") on February 10, 2014 approving the proposed substitutions for the Wynn Everett project with corresponding offsets as detailed in the Decision and summarized below:

- Water-dependent Use Zone (WDUZ) substitution: Allows the reconfiguration of the WDUZ with no net loss of area.
- Height substitution: Allows up to 55 feet in Zone A and up to 400 feet in Zone B. Offsetting measure is one new square foot of open space for every one square foot of net new shadow.

As anticipated in the MHP and described in the FEIR, the Wynn Everett project, at a height of 386 feet, does not result in any net new shadow. This should be confirmed at the time of Chapter 91 licensing with both graphics and calculations. The FEIR provides an updated wind study assessing the pedestrian level wind conditions associated with the proposed project. At a location near the proposed outdoor amphitheater, it was recommended that wind conditions be softened with landscaping or screening. The proposed project should include a final landscaping plan that includes landscaping and design elements to soften wind effects in this location so as to be conducive to summer outdoor activities that would be associated with the amphitheater and the surrounding open space.

- Lot coverage substitution: Allows lot coverage up to 60% with a priority offset of an open space connection between the development site and Gateway Park, and an alternative menu of offsets that include a kayak/canoe launch, fishing pier, and walking/bicycle paths.

As currently proposed, the project provides more than the required 50% open space on site within Chapter 91 jurisdiction and will not require a lot coverage substitution. The Wynn Everett project has committed to providing the priority offset, an open space/harborwalk connection between the project site and the existing open space to the north as a component of the project regardless of whether or not a lot coverage substitution is necessary. Should the project change and require the lot coverage substitution, the Decision provides a menu of offsets that are outlined in the MHP including a kayak/canoe launch, fishing pier, and new walking paths which should be employed.

The proposed Wynn Everett project is subject to the approvals and conditions contained in the Decision, which will guide and assist MassDEP in making regulatory decisions, pursuant to MGL Chapter 91 and the Waterways Regulations.

Consistency with CZM Program Policies

Ports and Harbors

CZM commends the proponent for including water transportation service as a component of the project, providing an alternative means of transit that activates both the watershed of the site and larger Boston Harbor, leveraging the proximity of the site to Downtown Boston in a way that does not disrupt vehicular traffic across the Alford Street Bridge. The project involves dredging to remove contaminated sediments and provide adequate water depths for vessels and a docking facility in the water embayment east of the site. CZM is supportive of remediating and restoring habitat, and activating the site with water transportation and recreational boating facilities, and recommends that during the permitting process, the proponent include all necessary documentation to verify that the proposed dredging is maintenance dredging.

Habitat

CZM commends the proponent for exploring ways of creating softer edges along the project site along the Mystic River. The FEIR provides information regarding the establishment of a “living shoreline” along the riverside edge of the development site, restoring the bank with salt marsh and other vegetation and re-establishing a shellfish bed. CZM recommends continued close coordination with CZM and the Division of Marine Fisheries regarding the proposed shellfish bed so that an appropriate type of shellfish or alternative living shoreline element is selected for the site. 1

Water Quality

CZM understands that due to the treatment of contamination on the site, there is limited ability for stormwater recharge. The FEIR provides general information about the two new proposed outfalls that would discharge into the embayment. CZM recommends that during the permitting process, the proponent provide additional detail regarding the design of the proposed outfalls and how runoff from the proposed new outfalls would not negatively impact water quality in the Mystic River. 2

In 2008, the Commonwealth designated Boston Harbor, including the Mystic River, as a vessel sewage No Discharge Area. Because the Wynn Everett casino project includes a water transportation facility and water transportation service with proposed ferry vessels as well as dockage for recreational users and water taxis, CZM recommends that the new facility include a boat sewage pump out to provide sanitary service to the vessels that will be using the new facility. 3

Federal Consistency Review

The proposed project is subject to CZM federal consistency review, and therefore must be found to be consistent with CZM's enforceable program policies. For further information on this process, please contact Robert Boeri, Project Review Coordinator, at (617) 626-1050, or visit the CZM web site at www.mass.gov/czm.

cc: Valerie Gingrich, CZM
Ben Lynch, DEP Waterways
Frank Taormina, DEP Waterways
Nancy Baker, MassDEP
Tay Evans, DMF
Jamie Errickson, City of Everett
Jamie Fay, Fort Point Associates



THE COMMONWEALTH OF MASSACHUSETTS
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MEMORANDUM

TO: Maeve Valley Bartlett, Secretary, EEA
ATTN: Anne Canaday, MEPA Unit
FROM: Bruce Carlisle, Director, CZM
DATE: August 8, 2014
RE: EEA 15060– Wynn Everett

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The proposed Wynn Everett project is subject to the approvals and conditions contained in the Decision, which will guide and assist MassDEP in making regulatory decisions, pursuant to MGL Chapter 91 and the Waterways Regulations.

Consistency with CZM Program Policies

Ports and Harbors

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In 2008, the Commonwealth designated Boston Harbor, including the Mystic River, as a vessel sewage No Discharge Area. Because the Wynn Everett casino project includes a water transportation facility and water transportation service with proposed ferry vessels as well as dockage for recreational users and water taxis, CZM recommends that the new facility include a boat sewage pump out to provide sanitary service to the vessels that will be using the new facility. 3

Federal Consistency Review

The proposed project is subject to CZM federal consistency review, and therefore must be found to be consistent with CZM's enforceable program policies. For further information on this process, please contact Robert Boeri, Project Review Coordinator, at (617) 626-1050, or visit the CZM web site at www.mass.gov/czm.

cc: Valerie Gingrich, CZM
Ben Lynch, DEP Waterways
Frank Taormina, DEP Waterways
Nancy Baker, MassDEP
Tay Evans, DMF
Jamie Errickson, City of Everett
Jamie Fay, Fort Point Associates



August 8, 2014

Secretary Maeve Vallely Bartlett
Executive Office of Energy and Environmental Affairs
Attn: Anne Canaday, MEPA Office
100 Cambridge Street, Suite 900
Boston, Massachusetts 02114

Re: EOEEA #15060 Wynn Everett FEIR

Dear Secretary Bartlett:

The Department of Conservation and Recreation (“DCR” or “Department”) is pleased to submit the following comments in response to the Final Environmental Impact Report (“FEIR”) submitted by Wynn MA LLC (the “Proponent”) for the Wynn Everett project (the “Project”).

As described in the FEIR, the Project proposes construction and operation of a Category 1 gaming establishment, contingent upon receiving a gaming license from the Commonwealth of Massachusetts. The proposal includes hotel, gaming, retail, restaurant, spa/gym, convention/meeting space, and entertainment /nightclub space. The Proponent submitted a Draft Environmental Impact Report (“DEIR”) in December 2013. In total, the Proponent has added 419,542 square feet of building space to its FEIR proposal compared with the DEIR, along with an additional 791 additional parking spaces (4,500 parking spaces in total). The Project is proposed on a 32.4-acre site (the “Site”) that fronts the Mystic River and is adjacent to an MBTA commuter rail line and the Mystic River Reservation. During peak periods, the Project is expected to generate approximately 35,000 vehicle trips per day (“vtd”).

DCR owns and operates transportation infrastructure in the vicinity of the Project Site, including Mystic Valley Parkway (which includes Wellington Circle), Revere Beach Parkway (which includes Santilli Circle), the Fellsway, and Mystic Valley Parkway. As presented in the Final EIR, a Construction and Access Permit will be required from DCR for proposed alterations to DCR roadways. The FEIR presents alternatives for improvements to DCR intersections and roadways including Wellington Circle, Santilli Circle, sections of Revere Beach Parkway in the City of Chelsea, and Sweetser Circle. In addition, DCR owns and operates the Mystic River Reservation, a 400- acre recreation facility in the municipalities of Arlington, Somerville, Medford and Everett. DCR also operates the Ameila Earhart dam, a flood control structure located on the Mystic River in the vicinity of the Site.

DCR submits the following comments relative to the proposed alterations to DCR transportation infrastructure to support the Project, and requests additional information in a Supplemental Final Environmental Impact Report.

COMMONWEALTH OF MASSACHUSETTS · EXECUTIVE OFFICE OF ENERGY & ENVIRONMENTAL AFFAIRS

Department of Conservation and Recreation
251 Causeway Street, Suite 600
Boston MA 02114-2119
617-626-1250 617-626-1351 Fax
www.mass.gov/dcr



Deval L. Patrick
Governor

Maeve Vallely Bartlett, Secretary
Executive Office of Environmental Affairs
John P. Murray, Commissioner
Department of Conservation & Recreation

Wellington Circle, Medford

The proposed mitigation at Wellington Circle in Medford includes the following: roadway widening at three locations to add travel lanes; replacement of traffic signal control equipment; reconstructed sidewalks; new ADA/AAB compliant handicapped ramps; and new pedestrian signal indications and revised traffic signal timing.

DCR notes that the roadway widening to accommodate additional lanes at Wellington Circle will come at the expense of existing green space, including a number of trees. DCR requests details on how the Proponent plans to mitigate these losses. 1

DCR notes it has recently installed Uninterruptable Power Supply (“UPS”) systems for the three traffic signal control cabinets at Wellington Circle. New UPS systems should be part of the proposed traffic signal equipment and should be designed for the increased electrical load of proposed additional pedestrian signals. Furthermore, the three existing traffic signal control cabinets at Wellington Circle are hardwire interconnected to coordinate traffic movements through Wellington Circle. A fourth intersection is also interconnected to the Wellington Circle system (Fellsway at President’s Landing, Medford). Accordingly, DCR notes that the traffic signal control equipment at Fellsway / President’s Landing should also be replaced in order to maintain compatibility with the overall Fellsway system. 2

DCR notes that Wellington Circle processes very high volumes of traffic along two major arterial corridors. DCR believes this system is at or near the practical limit of at-grade solutions. It is unclear what timing adjustments are being proposed by the Proponent at this time. DCR requests specific details on these adjustments.

DCR notes that alterations to the Wellington Circle area must be coordinated with the Massachusetts State Police (“MSP”), as the MSP operates its Medford barracks in the area. Unhindered access by the State Police to the Medford Memorial Veterans Parkway (Route 16) and the Fellsway (Route 28) must be properly maintained to respond to emergencies. DCR defers to the MSP on this issue.

Santilli Circle, Everett

DCR notes that proposed mitigation at Santilli Circle in Everett has changed substantially since the DEIR submission. A flyover is now proposed instead of a single point urban interchange. The Proponent feels that this will provide better traffic operations and improved aesthetics. MassDOT Traffic Operations personnel have been in contact with DCR regarding this proposed design change, indicating that a traffic model shows queues in the eastbound direction extending from Sweetser Overpass through Santilli Circle for an unknown distance in the direction of Wellington Circle. DCR requests that the Proponent provide the resulting 50% and 95% queue lengths from the proposed alterations. In addition, it is unclear what timing adjustments are being proposed at Santilli Circle by the Proponent at this time. DCR requests that additional information be provided by the Proponent on this issue in the SFEIR. 4

Sweetser Overpass, Everett

Proposed mitigation consists primarily of pavement marking changes to make this traffic circle operate as a modern roundabout. Proposed pavement markings and signage will create two dedicated right turning lanes on two approaches to the Sweetser Overpass. DCR notes that the signalized crossing at the top of the on-ramp from Sweetser Overpass to Revere Beach Parkway (Rte. 16) eastbound is a school crossing, and due consideration should be given toward ensuring the safety of this location. 5

Revere Beach Parkway and Washington Avenue, Chelsea

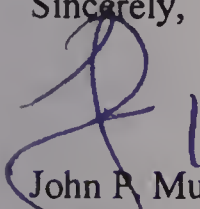
Based on the information in the FEIR, DCR notes it is unclear what timing adjustments are being proposed in this area by the Proponent. DCR will review and comment on proposed timing adjustments when they are developed. In addition, clarification of 50% and 95% queue lengths should be provided, similar to our comments relative to the Santilli Circle improvements above. 6

Revere Beach Parkway at Garfield Avenue and Webster Avenue, Chelsea

Based on the information in the FEIR, it is unclear what timing adjustments are being proposed in this area by the Proponent. DCR will review and comment on proposed timing adjustments when they are developed. DCR notes that consideration should be given to split phasing to eliminate interlocking left turns from Garfield and Webster Avenue. 7

Thank you for this opportunity to comment. If you need further information on transportation impacts, please direct inquiries to Ken Kirwin at 617-626-1498 or ken.kirwin@state.ma.us.

Sincerely,



John P. Murray
Commissioner

cc: Laura Dietz, Ken Kirwin, Mike Misslin, Joe Orfant, Nathaniel Tipton (DCR)
Jamie Fay, Fort Point Associates



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Northeast Regional Office • 205B Lowell Street, Wilmington MA 01887 • 978-694-3200

DEVAL L. PATRICK
Governor

MAEVE VALLELY BARTLETT
Secretary

DAVID W. CASH
Commissioner

August 8, 2014

Maeve Vallely Bartlett, Secretary
Executive Office of
Energy & Environmental Affairs
100 Cambridge Street
Boston MA, 02114

RE: Everett
Wynn Everett
1 Horizon Way
EEA #15060

Attn: MEPA Unit

Dear Secretary Bartlett:

The Department of Environmental Protection (MassDEP) has reviewed the Final Environmental Impact Report (FEIR) submitted by Wynn MA LLC to construct a 3,038,695 square foot (sf) resort casino on 25.6 acres of a brownfield site and 8.3 acres of the Mystic River in Everett (EEA #15060). The project will be comprised of a 386-foot high building with 627,073 sf of space for 504 hotel rooms, 77,250 sf for retail stores, 64,593 sf for restaurants, 192,543 sf of gaming space (3,200 slot machines and 160 gaming tables), and 46,072 sf of space for a spa/gym and convention/meeting facilities. Parking for 3,700 vehicles is planned in a four-level, 1,250,000 sf garage below the casino building. An additional 800 parking spaces are proposed offsite at an unspecified location. Most of the resort casino is located on filled tidelands.

The project also includes 69,000 sf of open space including a harbor walk and boating dock facilities for water transportation. Various on-site and off-site public amenities and waterside improvements are proposed such as landscaping, outdoor seating, salt marsh construction, shoreline stabilization, removal of deteriorated timber and steel piles moorings, shellfish bed restoration-related activities, and off-site harborwalk connections to area parks and an existing bike path/harborwalk. Maintenance dredging of 12,700 cy of flowed tidelands is proposed to accommodate the floating dock system for recreational vessels and water transportation services. MassDEP provides the following comments.

Wastewater

The FEIR indicates that the project will generate an estimated 228,428 gallons per day of new wastewater flows, based on the flow estimates included in 310 CMR 15.203. As of April 25, 2014, the MassDEP sewer permit regulations changed, and there no longer is a requirement for a MassDEP sewer connection/extension permit or compliance certification for this project. Under the provisions of the new regulations at 314 CMR 12.04(2)(d), MassDEP requires sewer authorities with permitted combined sewer overflows, and systems tributary to combined sewer overflows, which includes the City of Everett, to require the removal of four gallons of infiltration and inflow (I/I) for each gallon of new wastewater flows generated for any new connection where greater than 15,000 gallons per day of new wastewater flows will be generated. Accordingly, the FEIR indicates Wynn Everett's commitment to meet the four to one I/I removal requirement, though no specific I/I removal projects have been identified in the FEIR. Wynn Everett also has included a second, alternative approach to mitigate the impacts of the new wastewater flows. The second approach involves diverting flows from the project, and additional flows from the City of Everett to MWRA's North Metro Relief Sewer, because this sewer has more capacity and fewer sanitary sewer overflow (SSO) risks than the MWRA Cambridge Branch Sewer, which currently receives wastewater flow from the project area. The FEIR indicates that this second approach may be environmentally preferable, as it will help address sanitary sewer overflows in the Cambridge Branch Sewer tributary area, which can affect the Charles and Mystic Rivers.

MassDEP notes that while diverting flows from the project to a different portion of the MWRA system may be an environmentally beneficial project to pursue to reduce impacts from the project and potentially alleviate SSOs, it will not by itself serve to fully meet the requirements of the regulations – I/I mitigation will be a necessary component to meet the regulatory requirements of 314 CMR 12.00. These alternatives must be fully evaluated prior to any local sewer connection permit for the project. In this regard, the proponent should meet with the City, MWRA, and MassDEP to present more detailed information, and to seek agency input. The final mitigation measures must be conditions of any sewer connection permit. MassDEP will be reviewing the City's actions on this matter, as 314 CMR 7.03(3) authorizes MassDEP to require a MassDEP Sewer Connection Permit if such connection could potentially cause wastewater to bypass all or portions of the treatment works.

Wetlands

The FEIR has expanded on the wetlands information presented in the DEIR and includes both on-site and the off-site wetlands impacts for review. Wetlands impacts have increased since the DEIR review. The on-site impacts correspond to the removal and replacement of a deteriorated timber bulkhead, and the addition of a pier and walkway that would eliminate and impact coastal beach/tidal flats and alter coastal bank. The project also includes a dock and gangway system and dredging impacts to land under the ocean (LUO) and land containing shellfish. The impacts to coastal wetlands resource areas include: 41,080 square feet of land under the ocean, (9,230 square feet of permanent impacts and 31,850 square feet of temporary impacts), 30,310 square feet of coastal beach/tidal flat and land containing shellfish (13,310 square feet of permanent impacts, 17,000 square feet of temporary impacts), 7,455 square feet of coastal bank alteration (5,390 linear feet (lf) of permanent impacts and 2,065 lf of temporary

impacts), 18,010 square feet of land subject to coastal storm flowage (LSCSF), and 12,190 square feet of Riverfront Area.

The proposed mitigation measures for these impacts to LUO, coastal beach/tidal flats, and land containing shellfish will include 15,000 square feet of resource area to recreate oyster beds and the seeding of another 15,000 square feet of resource area to restore soft-shell clam flats. Oyster bed establishment will involve placement of cleaned oyster and/or sea clams as 2 bedding for spat attachment sites in sub-tidal areas. Recycled shells from local sources should be used for bed establishment.

In addition, the project proposes 10,900 square feet of new salt marsh and 12,080 square feet of restored/relocated Coastal Bank for a total of 22,980 square feet of "Living Shoreline." The salt marsh restoration will incorporate the two existing small salt marsh patches. A temporary stabilization edge will be provided to protect the restored salt marsh during the first few growing seasons as the marsh is established; the method of stabilization will be determined during the permitting process. The FEIR does not indicate whether the existing substrate will be amended to support the salt marsh restoration. As the existing sediments may not be sufficient to support restoration, consideration should be given to amendment with sand. Sand is not as mobile as organic materials and will provide a stable base for development of peat. Sand will not hold a slope so if a slope is proposed, there will need to be terracing. Filamentous algae may 3 inhibit growth of salt marsh vegetation. The restored salt marsh should be monitored for algae growth and algae should be raked out as necessary.

Off-site alteration of wetland resource areas will result from implementing roadway mitigation measures for project-related traffic impacts. Traffic improvements at Santilli Circle are expected to impact about 5,000 sf of Riverfront Area, and a proposed pedestrian connection to the Department of Conservation and Recreation (DCR) Gateway Park would alter 17,050 sf of LSCSF, 10,550 sf of Riverfront area and 21,300 sf of buffer zone. A bordering vegetated wetland replication area is proposed between the eastbound and westbound lanes near Santilli Circle.

Sea Level Rise

In response to climate change and anticipated increase in frequency of extreme storm events, as well as sea level rise, the proposed buildings will be elevated higher than the existing and preliminary FEMA 100-year flood elevations¹, which are elevation 9 and 10, respectively. The lowest first floor elevation of the facilities would be 2.35 feet above elevation 10, the preliminary FEMA 100-year flood elevation. All habitable floor space will be at least 7.5 feet higher, according to the DEIR. The main building with the hotel and gaming facilities will be elevated to 18.35 feet. The FEIR also indicates that the proposed design also includes elevating and flood-proofing parking garage entrances and other below grade spaces.

The vulnerability of the wetland resources to flooding impacts associated with the project should be taken into consideration, including an assessment of the pathways for accidental releases of chemicals during flooding events and commitments to adaptive mitigation measures to avoid and minimize the potential for environmental damage. The proponent also should be

¹ The preliminary flood elevations identified in the FEIR are for Suffolk County, which is adjacent to the site.

responsive in the future should additional adaptive measures be needed, as climate impacts and public understanding of vulnerabilities are better understood. 4

The sea level rise information is not specific about other measures that will be considered in designing the project, such as whether the outdoor and in-water facilities will be designed and anchored to withstand more frequent, intensive storms. The use of pervious pavements and weather-resistant materials on the harbor walkway and outdoor amenities also are measures that may prove to be sustainable over time. Inspection, maintenance, and restoration of these outdoor facilities prior to and after storm events should be a priority.

Stormwater

The FEIR indicates that the stormwater management system will be designed to comply with the Stormwater Management Standards, rather than the redevelopment standards as initially proposed. The stormwater system design will capture and treat one inch of runoff multiplied by the impervious area to protect the shellfish growing areas, as required for Critical Area Standard 6. Pretreatment of the stormwater runoff also has been designed to capture at least 44 percent of the total suspended solids (TSS) in advance of the bioretention basin, in the event that groundwater recharge is feasible. The proponent is seeking a waiver from the Stormwater Management Standard 2 requirement to provide control for the peak rate of runoff for runoff (Design Point 1), and the FEIR has provided additional information in support of that waiver request, which should be considered by the conservation commission to help determine whether control of the peak rate of runoff control is unnecessary, consistent with the *Stormwater Management Handbook*, Volume 1, Chapter 1, page 5. The FEIR has confirmed that the post-development peak rates of runoff for the 2, 10, 25, and 100-year storm events would increase to the Mystic River through the two proposed outfalls, but peak rates north off-site toward the railroad tracks (Design Point 2) decrease. In addition, the FEIR indicates that the stormwater management system currently is not being designed to provide groundwater recharge, because of historic contamination, and the anticipated need for an Activity and Use limitation on site.

Although the sizes of the proprietary separators and stormwater media filters do not appear to be identified in the *Stormwater Report* (Appendix H), there is sufficient information to assist the conservation commission in understanding the requirements for best management practice (BMP) sizing. Peak flow rate calculations, based on the wetlands program standardized method for sizing proprietary stormwater treatment devices, and third-party performance verification for a continuous deflection separator (CDS) and a Jelly Fish filter are provided. This additional information will guide the selection of appropriately sized BMPs and provide support for the total suspended solids (TSS) removal credit used in the TSS removal calculations, consistent with the *Stormwater Management Handbooks*, Volume 2, Chapter 4. In addition, it would be helpful to cross-reference the subcatchments in the water quality calculations and the TSS calculations to better understand the drainage system. Additional information should be provided, as needed, to the conservation commission with the Notice of Intent submittal to show that the BMPs in each subcatchment area are sized adequately to capture the peak flow rate computed.

Stormwater from the project site will discharge to the Mystic River through two new outfalls. The existing 36-inch outfall will be relocated; this outfall also discharges runoff from

the MBTA property. The proponent should be aware that the outfall design and materials need to resist erosion from the maximum stormwater discharge velocity, in accordance with the *Stormwater Management Handbooks*, Volume 3, Chapter 1, page 2. The plans of the riprap energy dissipation and tidegate designs (Figure 7-3B) do not show the wetland resources that would be impacted. However, MassDEP advises that the rip-rap splash pads at outfalls may not be sited within coastal wetland resources at the site, except land subject to coastal storm flowage or riverfront area, pursuant to the wetland regulations, 310 CMR 10.05(6)(k). In addition, the Stormwater Management Standard 1 specifies that new stormwater outfalls may not cause erosion of wetlands or waters of the Commonwealth.

It also is recommended that the proponent submit documentation to the conservation commission to support the use of ten percent TSS removal credit for street sweeping, in accordance with Table SS1 in the *Stormwater Management Handbook*, Volume 2, Chapter 1, page 9.

Waterways Program

The Waterways Regulation Program (WRP) has reviewed the above referenced ENF (EEA #15060), submitted by Wynn MA, LLC for the proposed Wynn Everett Casino and Resort Project located on a 33.9 acres of land (approximately 8.3 acres consist of flowed tidelands of the Mystic River, 10.63 acres of filled tidelands, and 14.97 acres of non-jurisdictional upland).

Chapter 91 Jurisdiction

The project will require a c.91 license as it involves the construction and maintenance of a non-water dependent structure on filled tidelands and various water-dependent landside and waterside work in flowed tidelands of the Mystic River. The WRP acknowledges that the project must conform to various performance and substantive standards of 310 CMR 9.00.

Water Dependency

Pursuant to 310 CMR 9.12, this is a nonwater dependent use project but it complies with the nonwater-dependent use standards pursuant to 310 CMR 9.51-9.53 and shall be consistent with CZM policies as stated in 310 CMR 9.54 and pursuant to 301 CMR 20.05(3).

Municipal Harbor Plan (MHP)

The proposed project is located within the Development Site Sub-Area identified in the Everett Central Waterfront Municipal Harbor Plan (MHP) approved by the Secretary of EEA on February 10, 2014 and is subject to the goals, recommendations, and policy guidance set forth in the Everett MHP pursuant to 301 CMR 23.

Prior to the FEIR, the Everett MHP was substantially completed but had not yet been approved by the Secretary. Now that the Everett MHP is in effect, there are various substitutions and policy guidance that are applicable to this proposed project. The FEIR describes the requirements for substitutions and offsets from three provisions of c.91 regulations as authorized in the state approved Everett MHP, as detailed below:

- 1) 310 CMR 9.51(3)(b) prohibits the ground-level use of structures on filled tidelands within 100 feet of a project shoreline to be Facilities of Private Tenancy (FPT). The Everett MHP

provides a substitution that FPT may be allowed within 100 feet of the project shoreline provided that an equivalent Facility of Public Accommodation (FPA) is provided adjacent to another FPA on site in an appropriate location to effectively promote public use and enjoyment of the project site beyond 100 feet from the shoreline. In the 2,583 sf of ground-level building footprint is located within 100 feet of the project shoreline there will be a Facility of Public Accommodation, as defined in 301 CMR 9.02, to satisfy the substitution and offset provision, although there will be not be any Facilities of Private Tenancy.

- 2) 310 CMR 9.51(3)(c) prohibits buildings for nonwater-dependent uses and surface or elevated parking facilities on filled tidelands within the Water-Dependent Use Zone (WDUZ). The WDUZ extends 100 feet or 25 percent of the weighted-average distance from the present high-water mark to the landward lot line of the property, whichever is less-but not less than 25 feet. The Everett MHP allows the required WDUZ to be modified as long as 1) a minimum width of 25 feet is maintained along the project shoreline, 2) any portion of a building within 50 feet of the shoreline contains a FPA, and 3) the modification results in no net loss of WDUZ area. The proposed project includes approximately 2,583 sf of FPA of a ground-level building footprint within the WDUZ; however, it is more than 50 feet away from the project shoreline. The project satisfies the requirements of the Everett MHP because 1) the WDUZ will be a minimum of 25 feet in width, 2) no buildings are located within 50 feet of the project shoreline, and 3) the reconfigured WDUZ does not result in a net loss of area. Furthermore, the project proposal includes a large open space at the southern end of the retail wing of the resort casino which expands the WDUZ beyond 100 feet in width from the shoreline, offering even more opportunities for the public to engage in water-dependent activities.
- 3) 310 CMR 9.51(3)(e) limits the height of buildings for nonwater dependent use on filled tidelands to 55 ft within 100 feet of the present high-water mark, which may be increased by one foot in height for every additional two feet of separation from the present high-water mark. The Everett MHP limits height to up to 55 feet in Area A and up to 400 feet in Area B, as shown in Figure 6-10 in the Everett MHP and Figure 3-17 of the FEIR. No offset is required if there are no new net shadow impacts on jurisdictional areas at the ground-level. Where a net new shadow adversely affects jurisdictional areas, one square foot of additional open space in or adjacent to the jurisdictional area within the MHP is required for every one square foot of net area of impact on water-dependent and/or public activity at the ground-level. The project includes a 386 foot hotel tower, one third of which is located in filled tidelands, which exceeds the baseline c.91 regulations. Under the allowable MHP substitution, the 386 foot tower is located within Area B, where building heights of up to 400 feet are permitted. The two-story low rise building is located in Area A, which also is significantly lower than the allowable 55 foot height limit. An updated shadow study and wind study were provided in the FEIR, which demonstrates to the Department's satisfaction that no new net shadow will be cast on ground-level jurisdictional areas, and no new net wind impacts will result from the increased height of the hotel tower in Area B. Accordingly, the proponent is not required to provide offsets for the additional height due to shadow or wind impacts.

In addition to compliance with the baseline c.91 lot coverage standard, pursuant to 310 CMR 9.51(3)(d), the proponent and the City have committed to providing an open space connection from the development site to DCR parkland to the north of the site via a connection beneath the existing MBTA railroad bridge. The Secretary's Certificate on the DEIR indicates that this open space connection should be reflected in all subsequent state permitting, irrespective of the need for a lot coverage substitution. Figures 2-25 and 3-13 in the FEIR show the proposed connection as required by the Secretary, but notes on page 4-2 of the FEIR indicate that the connection is subject to approval from the DCR, the MBTA, and an agreement with the Gateway Center Owner. The Department is pleased that the proponent acknowledges that the project site is a key parcel in the formation of a continuous waterfront access route along the Mystic River and has included some additional offsite improvements on the DCR parkland that were not required.

The Everett MHP also includes requirements for development within the MHP area beyond the referenced substitutions and offsets. The proposed project has addressed these requirements and is in conformance with the Everett MHP, pursuant to 310 CMR 9.34(2).

Commonwealth Tidelands

The project site includes a small amount of Commonwealth Tidelands, which are located within flowed tidelands on the south side of the project site. However no work, fill, or structures are proposed in this area. The FEIR states that approximately 15,000 sq ft of the Commonwealth Tidelands area within the project site will be utilized for shellfish and oyster restoration, which is not subject to the provisions of 310 CMR 9.53 and will not require compensation for interference with Public Rights in Commonwealth Tidelands pursuant to 310 CMR 9.35(4).

Chapter 91 Waterways License Application

The Department awaits the filing of a Chapter 91 Waterways License Application which meets the minimum filing standards outlined in 310 CMR 9.11(3).

Dredging and Dredge Material Disposal

The dredging will alter 41,080 sf of land under water, 2,840 sf of coastal beach, and 2,310 sf of coastal bank. This project includes maintenance dredging of an existing channel of 12,700 cy (sub-tidal and intertidal) of material to -6ft MLW, (with a one foot over-dredge) within the embayment of the project site. The FEIR reports that the sediment to be dredged are too contaminated (As, TPH, and PCBs) to be reused at a landfill. Accordingly, the plan is to dredge the material mechanically for dewatering on a scow. From the scow, the material will be transported for dewatering off-site, and disposal is proposed at an, unspecified, approved out-of-state facility. Dredged material will be disposed at an authorized upland disposal site in accordance with 314 CMR 9.00. After review of the FEIR, the proposed project complies with the standards for dredging and dredge material disposal pursuant to 310 CMR 9.40. References to licenses for former dredging projects are provided (page 3-25). Time of year restrictions will limit the dredging and in-water work from February 15th and September 30th.

401 Water Quality Certification

The proposed dredging work and other waterside improvements trigger a 401 Water Quality Certification, pursuant to 314 CMR 9.00, and accordingly the proponent must file an application with the Department for a 401 Water Quality Certification Permit.

Greenhouse Gas

The proponent is recognized for the commitment to designing an energy efficient and sustainable project, including a commitment to at least LEED Gold and potentially LEED Platinum for the project. Most notable is the commitment to incorporate sufficient renewable energy to provide about 30 percent of the project's electricity demand, including 20 percent from a cogeneration plant, three percent from rooftop solar, and seven percent from a Green Power purchase. The renewable energy components of the project have been estimated to reduce CO₂ emissions by about 546 tons/year (tpy), which reduces the emissions from the project by an additional three percent.

The FEIR has updated the evaluation of GHG emissions using a revised eQUEST model, version 3.65, to predict the emissions generated by the Mitigation Alternative. Other changes include an updated analysis of low-energy gaming machines with a commitment for a minimum of 80 percent low-energy machines, a revision of the CO₂ emission factors, a solar glare analysis, and additional information on the energy use for parking garage ventilation, in response to MassDEP's comment regarding the high level of efficiency that was reported in the DEIR.

The GHG analysis compared the Mitigation Alternative with annual CO₂ emissions for a baseline, defined by the 8th edition of the MA Building Code, (including the 2009 IECC with MA amendments). Supporting data and graphic simulation output reports were provided in Appendix F. The GHG evaluation concludes that with energy efficiency measures and transportation demand management techniques, the mitigation alternative would reduce CO₂ emissions from stationary sources by about 30.2 percent, (a reduction of 5,744.7 tpy), and mobile sources by about 13 percent (a reduction of 358.6 tpy) for an overall GHG emissions reduction of 28 percent (a reduction of 6,103.3 tpy).

The stationary source GHG emissions reductions are attributable to a cool roof, a high efficiency chiller plant, demand control ventilation and demand control exhaust ventilation for parking structures, energy recovery ventilation, a high performance building envelop, skylights with daylighting controls, lower light power density (interior lighting at 20 percent below Code), low-energy gaming machines, high efficiency elevators, an energy efficient design for kitchen and restaurant refrigeration, EnergyStar appliances, enhanced building commissioning, and occupancy controls.

In response to the MassDEP request for consideration of off-site mitigation of GHG emissions, the FEIR reported that the proponent's financial commitments to the host municipality could be used to support adoption of municipal energy efficiency measures, if the community chose to do so (page 15-34). As it is unclear how this would be accomplished, MassDEP asks for the proponent to collaborate with the City of Everett and the Everett Citizens Foundation, to accomplish the following, where feasible.

- Establish a municipal/school revolving fund for energy efficiency projects in the City of Everett and becoming a Green Community to reduce energy use consistent with state greenhouse gas reduction goals with the support of the Department of Energy Resources.
- Establishing a residential revolving fund for efficiency/weatherization projects to reinforce and enhance energy incentives offered by MassSave.

- Provide community education on clean energy, such as the “See the Light” program in public buildings. Additional information on Kilojolts’ See the Light Energy Toolkit Series on reducing energy consumption is available at the following website: <http://www.energytoolkits.com/>.

Air Quality- Mobile Sources

These comments pertain to the proposed project’s mobile source air quality impacts. The FEIR contained the required mesoscale analysis and reflected the additional trips that are predicted to be generated due to an increase in parking spaces for patrons at the site. VOC emissions for the 2023 Build Condition are predicted to be 84.3 kg/day or 13.5 percent higher than those for the 2023 No-Build Condition. NOx emissions for the 2023 Build Condition are predicted to be 40.6 kg/day or 10.3 percent higher than those for the 2023 No-Build Condition. Predictably, the Build Condition estimates higher VOC and NOx emissions than the No Build Condition. The 2023 Build with Mitigation Condition show reductions of VOC and NOx by 20 percent and 18.4 percent, respectively. The mesoscale analysis also demonstrates the benefits of mitigation in terms of CO₂ reduction. As shown in the FEIR, CO₂ emissions under the 2023 Build with Mitigation Condition (2,339.3 tons/year) will be 13 percent less than those for the 2023 Build Condition (2,757.9 tons/year).

Transportation Demand Management (TDM) Measures

MassDEP supports the proponent’s additional commitments to mitigation beyond those cited in the DEIR. The new or strengthened commitments cited in the FEIR include a shuttle bus system to connect the MBTA Orange Line stations at Malden Center and Wellington to the site; a proposed “Premium Park and Ride” shuttle service from the Massport Logan Express parking lots located in Braintree, Framingham, and Woburn to the project site; the employment of a full-time transportation coordinator; on-site availability of subsidized Massachusetts Bay Transportation Authority (MBTA) transit passes; access to on-site car-sharing services; a commitment to build a water taxi/shuttle docks for water transportation to the site as well as the construction of custom boats with clean emission jet drives for service to the site; and the establishment of a neighborhood shuttle for employees.

MassDEP also supports the proponent’s commitment to mitigate the impact of the project-related traffic by improving several local and regional roadways using Massachusetts Department of Transportation “Complete Streets” design, including bike and pedestrian improvements.

MassDEP is encouraged that the proponent will adopt pricing strategies to control parking in the underground garage for patrons although the specifics of the strategies are still outstanding; however, the FEIR is silent on pricing strategies for off-site employee parking. MassDEP recommends that the proponent consider charging a parking fee for spaces used by single occupancy vehicle (SOV) drivers to encourage employees to walk, bicycle, carpool, or take public transit to the site. Parking fees should be waived if employees carpool or vanpool to the satellite parking facilities. Conversely, if parking is free, the proponent can provide parking cash-out incentives to employees who would otherwise park at proposed remote locations thus encouraging employees to seek alternative modes of transportation.

While MassDEP acknowledges the proponent's effort to mitigate employee trips to the site by contracting with a third-party shuttle to transport employees to work, ultimately these employees are still driving part of the way to work when there is a wide array of transit options available. MassDEP requests that the proponent institute more robust parking pricing measures to encourage employees to seek alternative modes of transportation.

In addition to the generous number of measures the proponent has committed to implement to reduce vehicle trips to the site in the FEIR, MassDEP requests that the proponent consider the following recommendations:

- Although the FEIR specifies that 172 parking spaces will be allocated to alternative fuel vehicles, the proponent does not specify the number of electric vehicle charging stations to be allocated to those parking spaces. In view of the expected growth in the use of electric vehicles across the state in the coming years, MassDEP requests that the proponent plan to equip a minimum of one percent of the 3,700 available parking spaces with electric vehicle supply equipment (Level 1 or 2 dual-head charging stations) and make ready additional wiring infrastructure for future deployment of additional charging stations.
- In Section 12.2.4, *[Construction] Air Quality*, the proponent states that construction vehicles/equipment will include the use of ultra low sulfur diesel fuel (ULSD) and retrofitted equipment as needed. In addition to the use of ULSD and retrofit equipment, MassDEP requests that the proponent preferentially use construction equipment manufactured to Tier 4 emission standards and if a piece of equipment is not available in the Tier 4 configuration, then the proponent can use construction equipment manufactured to Tier 3 emissions standards that has been retrofitted with the best available control technology.
- The proponent did not indicate whether the proponent will participate in the EPA SmartWay Transport Partnership, a voluntary program that is designed to increase energy efficiency and reduce greenhouse gas emissions. MassDEP requests that the proponent participate in the SmartWay program. 7
- MassDEP is encouraged by the proponent's plan to use shuttle buses to bring employees and patrons to the site. To further the beneficial use of shuttle buses, MassDEP strongly encourages the proponent to consider the use of alternatively fueled vehicles or electric vehicles for all proposed shuttles.
- Because of the significant vehicle trips that the project will generate when fully operational, the proponent should install signage regarding idling in prominent locations in the parking garage, taxi stands, charter bus parking, and delivery areas. 8
- As recommended by MassDEP on the DEIR, the proponent is encouraged to provide direct deposit for all employees. 9
- The proponent should evaluate the feasibility of providing electric vehicle charging stations at the leased offsite employee parking locations.

Air Quality – Stationery Sources

The FEIR mentions the proponent's plan for a 1-megawatt (MW) micro-turbine cogeneration plant. The project proponent should ensure that the unit complies with 310 CMR 7.26(43).

Since the FEIR is silent with respect to any boiler units, MassDEP reminds the proponent that if there are plans to install any boiler units in the size range of 10-40 MMBtu/hr heat input, the project proponent should ensure that the boiler(s) comply with 301 CMR 7.26(30-37).

The FEIR is also silent on the number, size and location of any emergency generators. Any emergency engine generators 37 kilowatts (kw) or greater shall comply with 301 CMR 7.26(42).

MassDEP recommends that the project proponent meet with MassDEP to discuss plans regarding the 1-megawatt (MW) micro-turbine cogeneration plant, any boiler units in the size range of 10-40 MMBtu/hr heat input, and any emergency engine generators 37 kilowatts (kw) or greater, as soon as more detailed designs are available. 11

Massachusetts Contingency Plan/M.G.L. c.21E

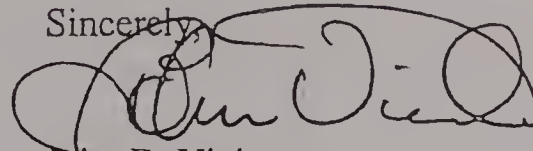
The proposed project consists of the redevelopment of a 33.9-acre site on the Mystic River between Alford Street/Broadway and a Massachusetts Bay Transportation Authority (MBTA) commuter railroad track, which includes approximately 25.6 acres of upland and 8.3 acres below mean high water. The proposed project area includes a disposal site, as defined in the Massachusetts Contingency Plan (MCP), 310 CMR 40.0000, which has been assigned Release Tracking Number 3-0013341. Contamination from former uses has been identified in soil, groundwater, and nearshore sediments in an adjacent cove and the Mystic River. The proposed project would consist of the construction of a multi-use complex, which would include a luxury hotel, a gaming area, shopping mall, dining establishments, parking garage, waterfront park and dock facilities.

The MassDEP Bureau of Waste Site Cleanup (BWSC) has completed a review of the sections of the FEIR that discuss contamination within the proposed project area, as well as the project proponent's responses to MassDEP/BWSC's comments on the DEIR. The approach outlined in the FEIR to address contamination within the proposed project area includes the excavation and off-site disposal of a large volume of soil, soil stabilization, the treatment of contaminated groundwater and subsequent discharge during construction-related dewatering activities, dredging of contaminated sediments, and the placement of clean soil over areas of contaminated soil. The proposed activities described in the FEIR will result in the removal of significant quantities of contaminants and substantially improve environmental conditions at the disposal site. In addition, the project proponent's responses to comments have adequately addressed the concerns MassDEP/BWSC identified in the review of the DEIR. MassDEP/BWSC has no further comments at this time.

The MassDEP appreciates the opportunity to comment on this proposed project. Please contact Richard.Blanchett@state.ma.us at (617) 654-6585 for mobile source air quality impacts, Heidi.Davis@state.ma.us at (978) 694-3255 for additional wetlands information, Kevin.Brandner@state.ma.us at (978) 694-3236 for further information on the wastewater issues, Ben.Lynch@state.ma.us at (617) 292-5615 or Frank.Taormina@state.ma.us, at (617) 292-5551 or for information on Chapter 91 waterways licensing, Andrew.Clark@state.ma.us at (978) 694-3213 for information on brownfields, Marc.Altobelli@state.ma.us, at (978) 694-3284 for issues relating to stationary source air quality issues, and John.Carrigan@state.ma.us at 978-694-3299

on solid waste disposal issues. If you have any general questions regarding these comments, please contact Nancy.Baker@state.ma.us, MEPA Review Coordinator at (978) 694-3338.

Sincerely,



John D. Viola

Deputy Regional Director

cc: Brona Simon, Massachusetts Historical Commission
Ben Lynch, Richard Blanchet, Frank Taormina, MassDEP-Boston
Eric Worrall, Susan Ruch, Steve Johnson, Rachel Freed, Kevin Brander, Heidi Davis,
Joanne Fagan, John Carrigan, Marc Altobelli, Andrew Clark, MassDEP-NERO
City of Everett, Conservation Commission
Marianne Connolly, MWRA
EkOngKar Singh Khalsa, Exec. Dir., Mystic River Watershed Association



Paul J. Diodati
Director

Commonwealth of Massachusetts

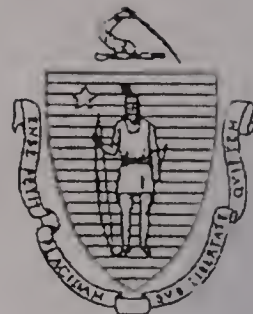
Division of Marine Fisheries

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Deval Patrick
Governor

Maeve Vallely Bartlett
Secretary

Mary B. Griffin
Commissioner

August 8, 2014

Maeve Vallely Bartlett, Secretary
Executive Office of Energy and Environmental Affairs
Attn: MEPA Office
Anne Canaday, EEA No. 15060
100 Cambridge Street, Suite 900
Boston, MA 02114

Dear Secretary Bartlett:

The Division of Marine Fisheries (*Marine Fisheries*) has reviewed the Final Environmental Impact Report (FEIR) submitted by Wynn Everett to develop the former Monsanto Chemical Plant property on the Mystic River in Everett. In addition to extensive upland development, the shoreline will also be altered and in some areas restored with salt marsh and riparian plantings. The proposal includes a 1,230-ft long steel sheet pile bulkhead, stone revetments and construction of pile supported walkways and floats for docking transient vessels. The former channel will be dredged to a depth of 6 feet below MLW over an area of 45,800 sf, including 7,720 sf of intertidal dredging.

Changes since the Draft Environmental Impact Report

Changes relevant to fisheries include an increased buffer between the harborwalk and the high tide line which will allow for additional area for riparian plantings and salt marsh restoration. Further work has also been done to develop the soft shell clam and oyster restoration proposal, although this was not done in consultation with *Marine Fisheries*.

Marine fisheries resources at the project site

The proposed project would result in alteration of Coastal Bank, Coastal Beach, Land Containing Shellfish, Saltmarsh and Land Under the Ocean. The Coastal Bank is characterized by degraded wharf structures and fill and is lacking a native riparian community. The Coastal Beach currently supports pocket salt marsh (*Spartina alterniflora*) persisting despite years of site degradation. Salt marsh provides a variety of ecosystem services, including habitat and energy sources for many fish and invertebrate species [1,2,3]. The coastal beach also supports a functioning intertidal mudflat with soft shell clams (*Mya arenaria*), which were surveyed on the site by *Marine Fisheries* biologists in June 2013. Land containing shellfish is deemed significant to the interest of the Wetlands Protection Act (310 CMR 10.34) and the protection of marine fisheries. Several diadromous fish species utilize the Mystic River, including alewife (*Alosa pseudoharengus*), blueback herring (*Alosa aestivalis*), white perch (*Morone americana*), American eel (*Anguilla rostrata*), and American shad (*Alosa sapidissima*) [4]. Winter Flounder (*Pseudopleuronectes americanus*) may be found in subtidal portions of the site.

Impacts and proposed restoration and mitigation

Mechanical dredging will be done using a closed environmental bucket to minimize sedimentation. The proposal states that all dredging will avoid the fisheries time of year restriction from **February 15 to September 30** of any year for the protection of diadromous fish, winter flounder, and shellfish critical life stages. The proposed 7,720 sf of intertidal dredging will result in loss of habitat that may require mitigation

through DEP and the Army Corps of Engineers. Construction of the bulkhead and walkway will result in 10,470 sf of impact to coastal beach and tidal flat that may also necessitate mitigation.

Marine Fisheries is pleased that Wynn has demonstrated a desire to pro-actively improve water quality and habitat on the project site. Salt marsh plantings along the coastal beach may enhance fisheries habitat and improve shoreline stabilization. We recommend the use of Coir rolls rather than a riprap sill seaward of the marsh plantings where possible to minimize erosion. The applicant has also proposed construction of an oyster reef and soft-shell clam re-seeding area as pro-active enhancement. Unfortunately, the project site is within GBH4.0, a prohibited area. We cannot approve shellfish enhancement in this area because the water quality is poor and is contaminated with unsafe bacterial levels posing a significant risk to public health [5]. Before shellfish enhancement can occur in the Mystic River, water quality improvements need to be addressed. To that end, there are several opportunities for habitat enhancement and water quality improvements in the Mystic River Watershed. There are also other areas in Boston Harbor, including nearby conditionally restricted areas, where shellfish enhancement could potentially be located. *Marine Fisheries* would be happy to continue to work with Wynn to identify a pro-active restoration project that would offer a beneficial contribution to the Mystic River watershed and Boston Harbor. 1

Questions regarding this review may be directed to Tay Evans in our Gloucester office at (617) 727-3336 ext. 168.

Sincerely,



Paul J. Diodati
Director

cc: Everett Conservation Commission
Fort Point Associates
Lou Chiarella, NMFS
Robert Boeri, CZM
Ed Reiner, EPA
Ken Chin, DEP
Mary Griffin, Richard Lehan, DFG
Tay Evans, Kathryn Ford, Jeff Kennedy, Glenn Casey, DMF

References

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2. Deegan LA, Garritt RH (1997) Evidence for spatial variability in estuarine food webs. Marine Ecology Progress Series 147: 31-47.
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5. Hickey JM, Shields T, Kennedy J, Ford K (2011) Shellfish planting guidelines. Massachusetts Division of Marine Fisheries. December 2011. <http://www.mass.gov/eea/agencies/dfg/dmf/programs-and-projects/shellfish-planting-guidelines.html>



Deval L. Patrick, Governor
Richard A. Davey, Secretary & CEO

massDOT
Massachusetts Department of Transportation

August 15, 2014

Maeve Vallely-Bartlett, Secretary
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114-2150

RE: Everett – Wynn Everett Resort Casino – FEIR
(EEA #15060)

ATTN: MEPA Unit
Anne Canaday

Dear Secretary Bartlett:

On behalf of the Massachusetts Department of Transportation, I am submitting comments regarding the Wynn Everett Resort Casino project, as prepared by the Office of Transportation Planning. If you have any questions regarding these comments, please call J. Lionel Lucien, P.E., Manager of the Public/Private Development Unit at (857) 368-8862.

Sincerely,

Clinton Bench
Deputy Executive Director
Office of Transportation Planning

CB/jll

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Planning Department, City of Everett
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PPDU Files
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MEMORANDUM

TO: Clinton Bench, Deputy Executive Director

FROM: J. Lionel Lucien, P.E, Manager, Public/Private Development Unit
Office of Transportation Planning

DATE: August 15, 2014

RE: Everett – Wynn– FEIR (EEA#15060)

A. Project Description

The Public/Private Development Unit has reviewed the Final Environmental Impact Report (FEIR) for the Wynn Everett project. The proposed project entails the development of a 2.6 million square-foot (sf) resort casino to be located on the west side of Route 99 (Broadway) in the City of Everett, opposite Mystic Street. The proposed development program has been modified since submission of the Draft Environmental Impact Report (DEIR), and would include:

- 192,543 sf of gaming space, including 3,200 slot machines and 160 gaming tables (4,160 total gaming positions);
- A 504 room (543,677 sf) luxury hotel tower;
- 77,250 sf of retail space;
- 64,593 sf of food/beverage space;
- 30,392 sf of entertainment space, including a nightclub;
- 32,942 sf of meeting facilities for business customers and large groups;
- A 13,130 sf spa and gym;
- A 5,322 sf, four-season winter garden;
- Approximately 383,725 sf of back-of-house and 75,473 sf of front-of-house support, restroom space and lobby lounge;
- Waterfront features, harbor walk, and water transportation docking facilities.
- An approximately 3,700 space parking garage (with five floors below-grade and six floors above-grade) and 800 off-site parking spaces with shuttle service for employees.

The project site comprises approximately 33.9 acres of land in the City of Everett, adjacent to the Mystic River. The project is bounded to the west by MBTA Commuter Rail tracks; to the north by the MBTA's Everett Shops; to the east by Route 99, an existing carwash, and the Massachusetts Water Resources Authority (MWRA) and the Boston Water & Sewer Commission Treatment Plant facility; and to the south by the Mystic River.

Based on information included in the FEIR, the project at full build is expected to generate approximately 19,594 net vehicle trips on an average Friday and 24,456 net vehicle trips on an average Saturday. The trip generation includes trips associated with employee off-site parking within the study area.

During the review of the FEIR, MassDOT identified some issues of concern as further detailed below. Subsequent to the filing of the FEIR, many of these issues have been addressed by the Proponent as part of our ongoing collaborative process. However, mindful of MEPA's public review process and in recognition of some issues that still need further refinement, MassDOT believes that the project merits the filing of a Supplemental Final Environmental Impact Report (SFEIR).

B. Project Permitting

The FEIR indicates that the proposed project would require the following approvals/permits:

1. MBTA Land Disposition/Easement Agreements/Approval

The proponent is seeking permanent property rights from the MBTA for the project. Firstly, the proponent is seeking to build the entrance to the casino from Broadway across the southeast corner of the Everett Shops, necessitating that the current entrance to the Shops be relocated. Secondly, the Proponent is seeking to acquire approximately 1.4 acres of land on the periphery of the Everett Shops to accommodate access driveways to the service areas on the project site. The Proponent has had preliminary discussions with MassDOT and the MBTA on the various agreements needed to acquire and/or obtain the necessary rights. While no agreement on these parcels has been finalized, should the Proponent ultimately receive a casino license from the Massachusetts Gaming Commission, the MBTA will negotiate the possible sale of this property consistent with all relevant requirements related to the disposition of public property.

2. MassDOT Vehicular Access Permit

The project will require a Vehicular Access Permit from MassDOT to implement improvements for modifications to the Interstate-93 Northbound off-ramp at Exit 28. The modifications would likely consist of traffic signal infrastructure (e.g. signal and queue detection), pavement markings, post-mounted signage, and overhead signage. In addition, the Proponent may be required to implement geometric improvements to supplement the proposed traffic signal improvements at Bell Circle.

For the proposed I-93 ramp modifications, the Proponent will need to prepare a Project Framework Document for review and approval by MassDOT and subsequent submittal to the Federal Highway Administration (FHWA). Upon completion of the environmental process, MassDOT will submit the PFD to FHWA for their subsequent review and approval. The PFD will be reviewed for conformance with the FHWA's Policy on Access to the Interstate System, which outlines the requirements for the justification and documentation necessary to substantiate any proposed changes in access to the Interstate System.

3. Airspace Review from the Aeronautics Division

The project will require a Federal Aviation Administration (FAA) Air Navigation permit for the casino building and construction cranes. The project also requires notice to the MassDOT Aeronautics Division using MAC Form E-10, Aeronautics Commission Request for Airspace Review, pursuant to 780 CMR 111.7. The project Proponent has indicated that they will

complete and submit this notification and will coordinate with the Aeronautics Division regarding further project planning.

4. Department of Conservation and Recreation Access Permit

The Proponent has proposed improvements along the Route 16 corridor at Wellington, Santilli, Sweetser, and Bell Circles. These locations are primarily under the jurisdiction of DCR. However, MassDOT has been in discussions for a potential transfer of the segment of Route 16 from I-93 to approximately Bell Circle. DCR is expected to remain the permitting authority for the proposed mitigation improvements at these locations until such time as that transfer is complete. In anticipation of its future responsibility for these facilities, however, MassDOT will coordinate the review and permitting of the improvements to ensure that they are consistent with MassDOT design standards.

C. Transportation Impact Assessment (TIA)

The FEIR includes an updated transportation study prepared in conformance with EOEEA/MassDOT Guidelines for Transportation Impact Assessments. The study includes a comprehensive assessment of the transportation conditions in the project study area based on a thorough analysis of existing and future conditions. The FEIR study has reevaluated the transportation impacts of the proposed project based on revised trip generation estimates along with future transportation demands due to projected regional traffic growth, independent of the proposed development. As in the DEIR, the FEIR includes a mitigation program that is intended to offset most of the adverse impacts of the project in the Future Build conditions. The mitigation program is a multimodal approach consisting of highway, transit, bicycle, water transportation, and pedestrian improvements. The Proponent has also committed to a transportation demand management (TDM) program to reduce automobile trip demand and further mitigate the impacts of the project.

MassDOT raised a number of issues on the DEIR, commented extensively on these issues, and requested that they be addressed in greater detail with supporting technical documentation in the FEIR. As described in more detail below, the FEIR as submitted does not fully address the issues raised in our review of the DEIR.

1. Trip Generation

The trip generation calculations for the project have been revised to reflect the new development program. The calculations are based on the trips that would be generated by each use separately, and then a share-trip credit is assumed between some of the uses. According to the FEIR Trip Generation Summary table, the project is now expected to generate 19,594 net vehicle trips, 24,104 person trips via public and private mass transportation modes, and 202 person trips via walking and/or bicycling on an average Friday, including 1,409 vehicle trips and 1,336 person trips via public and private mass transportation during the Friday site peak hour. The project is also expected to generate 24,456 net vehicle trips and 30,018 person trips via public and private mass transportation on an average Saturday, including 2,041 vehicle trips during the Saturday site peak hour.

The FEIR has updated the trip generation summary table to show all assumptions, land uses, and changes in the development program. The FEIR continues to base the trip generation on the size, location, and traffic volumes of comparable casino sites to establish a correlation between the number of gaming positions and trip generation in the DEIR. The trip generation has

also been revised to account for mode share and credits for multi-purpose trips, transit trips, and hotel trips.

Given the urban context of the project, the commitment to a strong TDM program, and our ability to hold the Proponent accountable to site trip reduction strategies through monitoring and reporting, MassDOT agrees that the project would result in a significant number of non-private vehicular trips. However, in the FEIR as filed, the calculation methods used to estimate the patron and employee trips by mode share are confusing and may, in effect, be “double counting” trips that are multi-modal. As an example, the analysis estimates that 2,811 patrons¹ will access the site on a typical Saturday via the MBTA Orange Line and estimates that all of them will take the patron Orange Line shuttle from the station to the site. As a result, these patrons have been counted as arriving both via private mass transportation (on the shuttle) and via public transit (the Orange Line). We discussed this issue with the Proponent subsequent to the filing of the FEIR and they have adjusted their methodology to correct this issue, and we remain comfortable that the project would result in a significant mode split for non single-occupant vehicles.

2. Traffic Operations

The FEIR presents an evaluation of traffic operations conducted for a number of intersections and roadway segments within the study area. The TIA includes updated capacity analyses and a summary of 50th and 95th percentile vehicle queues for these intersections. MassDOT has reviewed the impact of the project on traffic operations, including proposed mitigation measures intended to address these potential impacts on state highway locations.

With the addition of the site trip generation, several locations within the study area are expected to experience deteriorating conditions in the Future Build condition. In addition to several local intersections, we note that the project would adversely impact key locations on the state highway system, which are expected to provide regional access to the project site. These locations are generally operating at capacity during the AM and PM peak hours with excessive queuing, and many have existing safety concerns. These locations are as follows:

- The Route 99 corridor (between Sullivan Square and Sweetser Circle);
- The Rutherford Avenue corridor (between Washington Street and Sullivan Square);
- Sullivan Square (Cambridge Street at its intersections with Maffa Way, Rutherford Avenue and Main Street area) in Boston;
- The I-93 northbound off-ramp/Cambridge Street intersection in Boston.
- Santilli Circle (Route 16 at its intersections with Santilli Highway and Mystic View Road) in Everett;
- Sweetser Circle (Route 16 at its intersections with Route 99 and Main Street) in Everett;
- Wellington Circle (Route 16 at its intersections with Route 28 and Middlesex Avenue) in Somerville;
- Bell Circle (Route 1A at its intersections with Routes 16 and 60) in Revere; and

The Proponent has identified a mitigation program to address these impacts. Some of the proposed improvements are already in the local and/or state public process and are currently under planning and design. Other improvements will be implemented or funded directly by the Proponent. MassDOT has reviewed the proposed mitigation program and has the following comments for each of the locations identified above, which should be addressed in the SFEIR.

a. Route 99 Corridor

As currently defined in the FEIR, traffic mitigation along the Route 99 corridor (Broadway and Alford Street) would continue to produce unacceptable service levels, congestion, delays, and queues that have the potential of negatively impacting upstream intersections. This situation would be particularly evident during the Friday PM peak hour.

Specifically, those locations most affected would include:

- Site Driveway/Mystic Street/Broadway (Route 99); 2
- Beacham Street/Broadway;
- Bowdoin Street/Broadway; and
- Dexter Street/Alford Street (Route 99).

Subsequent to filing the FEIR, the Proponent has determined that the intersection analysis tools used in the FEIR may have exaggerated projected queues, incorrectly suggesting that upstream or downstream intersections may be blocked. The SFEIR should, therefore, include a revised analysis with a summary table that shows 50th and 95th percentile queue lengths along with available queue storages.

In addition to these defined problems with queues, the FEIR intersection operations calculations identify several lane groups/turning movements within the Route 99 corridor that, with mitigation in place, would continue to operate at service levels that are lower than acceptable. It should be noted that corresponding overall intersection operations are within acceptable standards, but there should be a balance provided whereby all lane groups/approaches are afforded an opportunity to accommodate their specific demand. The SFEIR should investigate additional mitigation measures such as new lane configurations, such as phasing modifications, optimization of signal timing and improvements to signal system coordination to achieve better operating conditions. 3

b. Rutherford Avenue Corridor

The City of Boston is currently proposing to reconstruct the Rutherford Avenue corridor with more consideration given to a “Complete Streets” design approach from the North Washington Street Bridge to Sullivan Square. The project specifically involves reducing the roadway from three lanes to two lanes in each direction, eliminating six bridges to create at-grade intersections, and providing adequate pedestrian, bicycle, and public transit accommodations. The design is currently funded with the use of federal funds secured with an earmark; therefore, the MassDOT Highway Division is overseeing the study and design of the project on behalf of FHWA. The project has already advanced to the design stage after a comprehensive public participation process, and the current design was selected as the preferred alternative to accommodate future traffic and the vision for the surrounding land use. The FEIR does not adequately document what impacts, if any, the project would have on the future design of the corridor. Subsequent to the filing of the FEIR, MassDOT met with the Proponent to discuss this concern in more detail and has achieved a greater level of comfort on the issue. In drafting the SFEIR, the Proponent should better document the relationship between the project’s proposed mitigation and the planned future condition of Rutherford Avenue. 4

c. Sullivan Square and I-93 Northbound Off-Ramp/Cambridge Street Intersection

The City of Boston is currently planning an improvement project to address long-standing safety and operational issues in the Sullivan Square area. These improvements would include removing the Rutherford Avenue underpass and reconstructing the rotary to support a more pedestrian-friendly area that would connect with the MBTA's Sullivan Square Station. As a result of the planning process, this redevelopment project has advanced to the level of conceptual plans identifying a number of connecting street blocks with multimodal accommodations. The Proponent has committed to interim improvements that would consist of the following: develop an optimal signal timing plan for the signalized Maffa Way/Cambridge Street intersection; interconnect and coordinate this traffic signal with the adjacent traffic signals; install a traffic control signal at the intersection of Rutherford Avenue with the traffic circle, which will be interconnected and coordinated with the Maffa Way/Cambridge Street traffic signal; and widen the Main Street approach to the intersection to provide two approach lanes.

The FEIR includes conceptual plans and capacity analysis for the proposed interim improvements as requested in the DEIR comment letter. However, these plans do not include sufficient information to review proposed intersection geometries in the vicinity of Sullivan Square with respect to traffic safety. Of particular concern are the intersections of Cambridge Street/Spice Street and Cambridge Street/Maffa Way/Sullivan Square Rotary. 5

Summary of delay, volume-to-capacity ratio, and 50th and 95th percentile queues are provided for all the intersections within and in the vicinity of the traffic circle. The FEIR analysis continues to demonstrate that even with proposed mitigation, the queues could not be accommodated within available storage, thus negatively impacting upstream intersections and potentially impacting overall system operations of the network.

A triple right-turn lane configuration is proposed in the FEIR as mitigation along the Cambridge Street eastbound approach to Maffa Way. MassDOT would not typically support any design having more than a dual turn lane. The prevailing opinion has been that, given a triple lane design, one of the three lanes would be vastly underutilized (independent of actual demand) 6 and that lack of adequate receiving area width and length could create an unsafe condition. Driver unfamiliarity with such a design could also be both a safety and operational issue. Subsequent to the filing of the FEIR, MassDOT and the Proponent discussed some possible tweaks to this design, which should be more fully addressed in the SFEIR.

In addition, MassDOT notes some discrepancies between the SYNCHRO traffic software and the VISSIM simulation model used to verify the mitigation plan performance measures. The VISSIM model included a traffic control signal at the Cambridge Street/Spice Street intersection. The SYNCHRO intersection analysis did not. It is critical that the signal locations and intersection approach geometry (e.g., number of lanes, lane width, lane usage, etc.) be the same 7 for each analysis method. Peak hour queues predicted by SYNCHRO are much longer along Cambridge Street eastbound than those indicated by the VISSIM model. During our review of the FEIR, MassDOT contacted the proponent to discuss these anomalies and subsequently received a corrected VISSIM model.

While for the most part the congestion in the Sullivan Square area is related to existing conditions, and the feasibility of providing geometric improvements may be limited at some of these locations due to right-of-way constraints, MassDOT is particularly concerned about operations of the I-93 northbound off-ramp. Friday PM peak hour Mitigated Build analysis indicates that a queue of 667 feet (27 vehicles) would occur on the Cambridge Street eastbound

approach. While decreased from No-Build conditions, this queue would still extend beyond the I-93 NB exit ramp, thus potentially resulting in lengthier queues on the ramp, itself.

As part of the SFEIR, the Proponent should describe further revisions to intersection analyses and projections of queue lengths that have been submitted to MassDOT subsequent to the filing of the FEIR. Additional revisions to the proposed Main Street/Maffa Way/Cambridge Street/Alford Street intersection geometry should also be described, consistent with ongoing 8 discussions with MassDOT. It should be noted, however, that the City of Boston would ultimately be responsible for reviewing, approving, and the permitting such improvements.

The SFEIR should also include an evaluation of whether two-way access is, or can be, provided between the Sullivan MBTA Busway and the Charlestown Bus Garage, using Beacham Street and signalized intersections with Main Street and Maffa Way. This would significantly 9 reduce the number of MBTA buses accessing the MBTA garage in the traffic circle, thereby improving traffic operations.

d. Santilli Circle

Santilli Circle is part of Revere Beach Parkway (Route 16) and is under DCR jurisdiction. To address the poor operations at this location, the Proponent has identified conceptual improvements to address both current and projected future operational deficiencies. In the DEIR, these improvements entailed the construction of a grade-separated, single-point urban interchange (SPUI) to replace the existing signalized rotary. MassDOT requested that a comprehensive alternative analysis be provided to justify the selection of the SPUI as the preferred alternative. Since then, the Proponent, with input from MassDOT, conducted that analysis and identified a new preferred alternative to address both existing and Future Build conditions at Santilli Circle. The Proponent now proposes to modify the signalized rotary by constructing a flyover ramp from Route 16 eastbound to the Route 99 Connector Road. The improvements would also include an enhanced, accessible pedestrian path along the western and northern sides of the rotary and across Mystic View Road and Santilli Highway. While the concept has merit from a traffic operations standpoint, MassDOT requires additional information to confirm the engineering feasibility of its implementation. As proposed in the FEIR, the alignment and profile of the flyover may not meet design standards, and additional widening may be required to accommodate the beginning of the flyover between the exit area at Route 16 eastbound and its proposed terminus near the bus stop and the intersection of Kevin Street with the Route 16 Connector.

As a result of continuing discussions between MassDOT and the Proponent, conceptual plans (alignment and profile) of the preferred alternative have been revised at an appropriate scale 10 and level of detail. While MassDOT believes the alternative has merit, final conceptual plans should be provided in the SFEIR to allow for a full public review of the alternative.

e. Sweetser Circle

The capacity analysis provided for Sweetser Circle indicates that the additional traffic associated with the project would exacerbate existing constrained operations at this location. Queue lengths for the Future Build conditions are very long on both the Route 99 northbound and southbound approaches. The Proponent has committed to provide improvements to the circle in the form of new signage and pavement markings to improve lane utilization and guide motorists through the rotary more efficiently. This would reduce the number of merge and diverge movements within the rotary, thereby improving efficiency as well as providing a substantial

safety improvement. The FEIR includes a capacity analysis with these improvements in place that indicates that LOS, delay, and queue lengths would significantly improve as a result of these improvements. The analysis was based on the SIDRA traffic software, which is generally the standard to conduct traffic analysis for roundabouts and/or traffic circles. On the other hand, the VISSIM analysis indicates significantly different performance measures for the same location. 11 For example, 95th percentile queue lengths on the Route 16 westbound off-ramp to Sweetser Circle extend back to the Route 16 mainline and could create both safety and operational issues. The SFEIR should correct this discrepancy.

In addition to these improvements, the proponent has assumed in the DEIR that the planned long-term improvements at Santilli Circle would result in a direct improvement to traffic operations within Sweetser Circle. The proposed improvements at Santilli Circle have since 12 changed as described in the FEIR. The SFEIR should clarify whether this original assumption is still valid with the modified improvement plan proposed for Santilli Circle. In addition, the performance measures used to demonstrate how Sweetser Circle would benefit from the improvements at Santilli Circle should be provided in the SFEIR.

f. Wellington Circle

The FEIR includes performance measures for the Future Build and Future Build Conditions with Mitigation for Wellington Circle. This is a very complex location, which functions as a network of closely spaced signalized and coordinated intersections. As mitigation, the proponent has committed to implement a combination of traffic signal timing and phasing upgrades and geometric improvements to address the project's traffic impacts. Specific geometric improvements would include the widening of the Route 16 approaches and an additional left-turn lane on the Route 28 northbound approach. The capacity analysis indicates that these improvements would generally bring LOS and delay to pre-existing conditions, while queues on some approaches would significantly worsen. MassDOT supports the implementation of these improvements as interim measures, but this location has been under consideration for 13 study of a complete redesign to address existing deficiencies and the impacts of a number of recently proposed private development projects. The Proponent has committed to contribute to the study and implementation of a long-term solution for this location, and the SFEIR should reflect this commitment.

g. Bell Circle

The Proponent has committed to traffic signal equipment, signs, and pavement marking upgrades to improve safety and meet current design standards. The FEIR included an acceptable evaluation of associated performance measures to gauge the effects of these improvements.

3. Public Transportation (MBTA)

The MBTA, through MassDOT, provided extensive comments on the DEIR for the Wynn Everett project. The FEIR for the project acknowledges those comments, but in many cases does not fully address the MBTA's questions.

a. Shuttle Bus Service

The FEIR presents additional information on impacts relating to the use of shuttle buses to the MBTA stations, but remains vague regarding what type of improvements could be made to the existing station and bus network to facilitate greater usage of transit to access the project.

The Proponent would be offering a shuttle service between Wellington Station and the site. The FEIR does not provide information on how its service schedule would align with the Orange Line schedule, the capacity of the shuttle system to accommodate both patrons and employees, and whether the frequency of service would make it a viable alternative for employees and patrons who could travel via Wellington Station. Subsequent to the filing of the FEIR, the Proponent provided a preliminary comparison of shuttle service arrivals and departures relative to Orange Line service. This analysis should be further refined and documented in the SFEIR. The Proponent should continue to coordinate with MassDOT and the MBTA in determining how this service would interact with existing MBTA bus routes that stop at Wellington Station, both in competing for berthing space and in potentially duplicating service that already exists. 14

Through discussions between the Proponent and the MBTA, it was determined that no private shuttle buses will be provided between the Sullivan Square MBTA station and the site. This is due to the limitation of the station to accommodate additional vehicles at this already congested facility. In addition, there are three existing bus routes that travel along Route 99 between the station and the project site, with stops very close to the site. Bus Routes 104, 105, and 110 operate near the site, with headways varying widely from 15 minutes to 70 minutes. Service during late nights and weekends is also limited. In the SFEIR, the proponent should provide analysis based on their employees expected journeys to work to determine if this existing MBTA service will be sufficient to handle the demand connecting service to Sullivan Station. Since a parallel shuttle service is not feasible, the proponent should work with the MBTA to determine how existing service may be enhanced to improve the user experience. Alternatively, they must show that their shuttle service from Wellington Station will be a more attractive option to both employees and patrons with the understanding that most travelers arriving from the City of Boston and points south will find Sullivan Square to be a more attractive connecting point. 15 16

b. Transit Demand and Impacts to the Transit Network

The DEIR included an Orange Line capacity analysis that identified potential mitigation to improve headways from 10 minutes to 8 minutes during the off-peak hours to keep average passenger loads within the crowding standard. However, the FEIR now shows that there is ample remaining capacity even without headway improvements. As a result of ongoing discussions with the Proponent, it appears that this discrepancy is due to a difference in the peak load point assumed for the Orange Line, as well as differences in the load standard for core stations and non-core stations (as defined in the MBTA's Service Delivery Policy). These issues should be addressed more fully in the SFEIR, and the Proponent should provide a revised analysis of projected Orange Line peak loads for weekday and weekend service days between Wellington and Back Bay Stations. Should the projections show loading standards to be violated, the Proponent should discuss with the MBTA and MassDOT providing financial support for increased Orange Line service. 17

The FEIR continues to indicate that Malden Center Station and Wellington Station would be the possible locations for shuttle pick-up and drop-off. The MBTA specifically requested that the FEIR identify, for each of the possible stations it will serve by shuttle, where passengers will board and alight those shuttles. For the MBTA to determine if these shuttle drop-off and pick-up locations are feasible, more detailed shuttle-berthing plans showing how these private shuttles will access the stations are required in the SFEIR to ensure that the berthing areas and shuttle routes at the stations do not interfere with existing MBTA bus routes. In addition, the Proponent should demonstrate in the SFEIR, preferably with graphics, what the accessible path of travel

would be for customers transferring between these shuttles and the MBTA services. Of particular importance to the MBTA are all codes and standards related to the Americans with Disabilities Act (ADA), and the Massachusetts Architectural Access Board (MAAB), and the Federal Transit Administration (FTA) regulations and guidance. 18

In the DEIR comment letter, MassDOT reiterated the need to present, preferably in graphical format, what the path of travel is from the existing MBTA bus stops along Broadway to the facility. This would help determine how pedestrian crossings and bus stops could be coordinated to ensure safe and accessible travel for bus customers. This information is not presented in the FEIR. In a recent meeting, the Proponent has indicated that this would be determined as the project evolves to the design level; however, MassDOT feels that sufficient information should be provided to ascertain that the MBTA service would be attractive to customers. The locations of the bus and the pedestrian crossing movements could further worsen the operations of traffic signals in the corridor, which are already operating at an unacceptable 19 LOS. The MBTA continues to be available to engage in these conversations so that a specific proposal can be shown in the SFEIR.

In addition, the SFEIR should specifically address what the impacts to MBTA bus service would be due to traffic generated by the project. The MBTA assumes that the SFEIR will provide a turning movement analysis and an LOS analysis for all affected intersections. The MBTA requested that the FEIR present, in a tabular format, an assessment of which of these intersections are utilized by MBTA buses and how their timing or turning movements may be 20 affected by the increased traffic and/or proposed roadway changes generated by the project. This particular concern was not specifically addressed in the FEIR, but subsequent to its filing, a summary table of intersection delays and projected bus travel times was completed. This additional information suggests that there are no cumulative travel time increases on MBTA bus routes along Route 99, but a full refined analysis of all impacted bus routes should be presented in the SFEIR.

c. Facility Impacts to the MBTA Everett Shops

The Proponent's plans include an access alternative that would necessitate the acquisition of a small parcel of land from the MBTA Everett Shops. While no agreement on this issue has been finalized, should the Proponent ultimately receive a casino license from the Massachusetts Gaming Commission, the MBTA will negotiate the possible sale of this property consistent with all relevant requirements related to the disposition of public property. Nonetheless, the MBTA wishes to express clearly that the overall role of this facility is critical to the MBTA's bus and subway operations and the MBTA has no plans for alternative sites to perform these repair and maintenance functions. The MBTA, if the project moves forward, will continue to occupy the Everett Shops and will continue to operate the facility seven days per week/24-hours per day. The Proponent should have no expectation of diminished functions and activities at the neighboring MBTA facility.

As currently envisioned, the Proponent seeks permanent property rights from the MBTA for the project. The Proponent is seeking to build the entrance to its facility from Broadway across the southeast corner of the MBTA site. This access road will overlap with the MBTA's main secure (i.e., gated) entrance to the site, thus requiring that the entrance be relocated. This 21 relocation changes the orientation and usage of the site, since all employee and truck deliveries are made through this gated entrance. MassDOT feels it is critical that this information be laid out explicitly and with sufficient detail in the SFEIR so that the MBTA can determine whether or not this proposal would adversely affect critical transit operations.

In particular, the SFEIR should describe how MBTA buses, as well as delivery trucks, will access the site from the new entrance and with the new service road in place. Further analysis is needed showing whether all trucks and buses expected to use the site will continue to be able to access the loading docks and entrances to the building. Turning movements for all potential vehicles must be examined to see if there is any loss of functionality resulting from the new entranceway as well as the new service roadway. 22

In advance of filing the FEIR, the Proponent met on site on numerous occasions with MassDOT and the MBTA to discuss the site access plan, site operations, and employee access to the facility. More specifically, the Everett Shops employees responsible for daily operations of the site took part of in these discussions. Driving demonstrations were conducted on-site to determine the feasibility of the modifications of site circulation and identify any potential loss of functionality or shortcomings of the access plan. Analyses conducted subsequent to the filing of the FEIR suggest that the Proponent is prepared to adequately address the above questions in the SFEIR.

4. Pedestrian Access

MassDOT requested in the DEIR comment letter that the Proponent expand the scope of the pedestrian improvements to include additional intersections within walking distance of the project. This particular comment is not specifically addressed in the FEIR. The conceptual plans and the discussions included in the FEIR limit the evaluation of pedestrian facilities to the Route 99 corridor and connections to the Everett/DCR Mystic River Parkway. Due to the proximity of the MBTA's Sullivan Square Station to the project, the roadway segment between the two sites is expected to experience some level of pedestrian activity. Even with the provision of public transportation from the station to the site, casino patrons and employees may elect to walk between Sullivan Square Station and the project site in certain instances – especially if they have just missed their buses upon arriving at Sullivan Square Station or departing the site. 23

Subsequent to the filing of the FEIR, the Proponent presented several alternatives for pedestrian access from the site to key destinations within walking distance – including MBTA Orange Line stations. These include the use of existing pedestrian infrastructure, enhanced infrastructure, and new facilities. For example, the Proponent discussed a potential connection from the new MBTA Assembly Station across the Mystic River to the project site. This alternative would significantly shorten the walking distance from the Orange Line and would be an attractive option to walk to the site. However, this option would require extensive permitting and collaboration from several entities for its implementation. The Proponent has indicated a willingness to contribute to its implementation should the construction of this option become feasible. A full and detailed description of potential pedestrian improvements should be included in the SFEIR. 24

5. Bicycle Access

While the Proponent has identified a comprehensive program for improving bicycle access to the site, MassDOT continues to have concerns about whether some elements of the program could be implemented prior to site occupancy or in some instances, whether they can be implemented at all. Bicycles lanes are proposed along the Route 99 corridor; however, they are discontinued at Sweetser Circle. The Proponent has indicated in discussions that they would work with the City of Everett to seek an alternative to connect the bicycle lanes to Route 99, north of Route 16. Further, the Proponent has noted that based on the latest discussions with the

City of Everett, the Rail Trail project which would improve bicycle connections along Route 99, is expected to be constructed in the near future. In light of the credits for bicycle trips and the commitment to hire locally, adequate bicycle facilities should be provided to increase use and/or justify the credit. These accommodations should be clearly described in the SFEIR, and more details provided as to the feasibility of their implementation and the Proponent's commitment to ensure the sustainability of these measures. 22

6. Parking

According to the FEIR, the project will provide 3,700 parking spaces on-site to accommodate hotel guests, casino patrons, and visitors to the retail shops, restaurants, and nightclubs. The project would also provide 800 off-site parking spaces for employees.

The Proponent has indicated that a revenue control system will be installed in the underground parking garage and pricing strategies would be implemented to manage parking. This would help reduce single-occupancy vehicle trips and encourage the use of alternative transportation modes. The Proponent should commit to monitor the effectiveness of the pricing strategies and adjust prices as needed to meet the goals of site trip reduction and efficient site access and circulation. 23

7. Transportation Demand Management (TDM)

The FEIR includes a revised TDM program that is generally responsive to MassDOT's comments on the DEIR. The TDM plan has committed to a wide range of multimodal measures aimed at reducing trip generation and promoting the use of existing and new pedestrian, bicycle, and transit facilities. These measures are generally classified as follows: transit measures, pedestrian improvements, water transportation, bicycle improvements, parking measures, and other measures. Some of the details of the TDM proposal related to pedestrian, bicycle, transit, and parking were discussed above.

The FEIR presents a more robust TDM plan that would be more effective in the following ways:

- Facilitate better coordination with the MBTA to implement the TDM plan with maximum success possible;
- Provide a more employee-centric TDM plan because employees will be the primary users of the transit access to the site;
- Explain how shifts will be arranged to promote the most usage of transit by employees;
- Provide specific details on incentives that would be offered to employees and casino patrons who use non single-occupant vehicle modes to access the site;
- Commit to work closely with MassRIDES in implementing the TDM program; and
- Propose a template to track the effectiveness of the TDM program, including an appropriate plan and timeframe for traffic monitoring.
- The proponent has responded to these concerns in their expanded FEIR TDM plan. They are proposing a series of strategies and incentives that are more sites specific and employee-centric than the more generic commitments offered in the ENF. In addition to employee's incentives, the proponent has committed to a strategic marketing program to inform employees and patrons of the varied mode options available when accessing the site. In addition, they will conduct regular reporting and evaluation of TDM measures

after implementation to ensure their success and will commit to making adjustments as necessary to elements of the plan that are not effective.

- The proponent will hire a transportation coordinator to oversee the TDM implementation and to reinforce the proponent's commitment to meeting and exceeding the non single-occupant automobile mode share projected. This person will primarily be responsible for providing information and targeted marketing to encourage alternative modes use by both employees and patrons. The coordinator will be tasked with regular monitoring and reporting of the TDM effectiveness. Reporting will occur at least one time per year in concert with the traffic monitoring that will also be conducted. Central to the effectiveness of the coordinator is the realization that these methods may need to be changed, adjusted, and expanded over time if they are not meeting goals. Per our recommendations, the coordinator will work with MassRIDES to encourage the employee use of Nuride and to aid in the implementation of the program.

Because the largest impact can be made by influencing the traveling habits of employees, the following are specific measures from within the FEIR expanded TDM plan that are intended to discourage automobile travel to the site by employees:

- Dissemination of information on transportation routes in back of the house areas of the casino and on the employee internet site and employee portal;
- Creation of an internal incentive and rewards program to encourage walking, bicycling, and transit use. Prizes might include gift cards to area businesses and additional paid time off;
- Encourage employees to participate in the Nuride incentive program that rewards employees for taking greener trips;
- Management of parking at off-site employee parking lots to avoid employees parking in the local neighborhood;
- On-site Charlie Card sales;
- Providing one free month Charlie Card pass and a 30% subsidy of subsequent monthly passes for those using transit; the balance of which can be paid in pre-tax dollars;
- Provision of bicycle commuter facilities such as secure bicycle parking and showers/changing facilities;
- Membership in a transportation management association to expand transportation options for employees;
- Providing a neighborhood shuttle for individuals who live in neighborhoods with high concentrations of employees; and
- Providing a guaranteed ride home program.

Given the vast differences in the commuting patterns of employees and patrons, the Proponent has, at MassDOT's request, developed TDM programs specific to each group. The following measures would be implemented to support the patron mode shares that are being projected:

- Installation of a Hubway bicycle sharing station;
- Patron mailings and local advertising would include information on reaching the site via transit;
- Providing proper employee training so that they can properly assist patrons in accessing the site and other area attractions via transit, walking, and bicycling;
- Incentives to customers who use the MBTA or water taxi service to reach the site;
- Resort website information prominently featuring information on accessing the site; and

- Water taxi and Charlie Card sales on site.

The revised TDM plan is generally acceptable to MassDOT and responds appropriately to specific comments made in our prior comment letters. The Proponent should continue to work with MassDOT and the parties identified to further refine the plan, as well as to monitor the program after implementation and to make changes as necessary. 24

8. Transportation Monitoring Program

The Proponent has set a goal of 29% of patrons to arrive to the site via non-automobile modes and 71% arriving via automobile and taxi. For employees, the goal is for 59% to arrive via non-automobile modes and the remaining 41% arriving via automobile. This is a reasonable goal the Proponent and MassDOT expect can be met and even exceeded; however, the TDM plan would need to be strictly monitored to reinforce employee and patron behaviors and minimize the amount of single-occupant vehicle travel to the site.

As part of the project mitigation program, the Proponent has committed to implementing a transportation monitoring program to be initiated upon occupancy of the project. The goals of the transportation monitoring program will be to evaluate the assumptions made in the EIRs and the adequacy of the transportation mitigation measures, and to determine the effectiveness of the TDM program.

Due to the size of the project, MassDOT anticipates the need to monitor and update the TDM program as necessary before the project reaches full occupancy. If the traffic monitoring program indicates that the proposed mitigation is not effective in accommodating the future traffic volumes at key area intersections impacting the state highway system, the project proponent will be responsible for identifying and implementing additional operational improvements at these constrained locations. The monitoring program would provide the opportunity for the Proponent and/or MassDOT to implement appropriate improvements or adjustments that could entail traffic signal timing and phasing modifications, optimization of the coordinated/interconnected signal system, and/or further refinement of the TDM program to reduce site trip generation.

In summary, ongoing discussions with the Proponent have addressed a number of issues with the mitigation program for the project, and MassDOT appreciates the collaborative approach the Proponent has taken. We look forward to continuing to work with the Proponent to address remaining issues in advance of the filing of the SFEIR. Coordination with the MassDOT Highway, Rail & Transit, and Aeronautics Divisions should continue, as should coordination with the Office of Transportation Planning. If you have any questions regarding these comments, please contact me at (857) 368-8862. 25



Massachusetts Port Authority
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August 8th, 2014

Secretary Maeve Vallely Bartlett
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Anne Canaday, EEA No. 15060
100 Cambridge Street, Suite 900
Boston, MA 02114

Re: Wynn MA LLC – Proposed Everett Casino

Dear Secretary Bartlett and Director Buckley:

On behalf of the Massachusetts Port Authority (Massport), we thank you for the opportunity to submit comments on the FEIR submitted by Wynn MA, LLC for the proposed Wynn Everett casino and resort project on approximately 24 acres of a 33.9-acre site on Horizon Way off Lower Broadway (Route 99) in Everett, MA. The project site is currently undeveloped but formerly was the site of a Monsanto chemical manufacturing facility. As owners and operators of Boston Logan International Airport, Massport is interested in the project and its transportation elements, facility design and operational features.

We are pleased that the Wynn Everett team has reached out to Massport as its project planning has evolved; we also note that we have also coordinated our comments directly with MassDOT through their Highway and Aeronautics divisions. That coordination has provided us with an excellent project understanding. Based on those meetings and our review of the FEIR, we understand that the integrated resort and casino has the following major elements:

- 4,160 gaming positions and associated entertainment and meeting facilities
- A hotel of a height of 386 feet, totaling approximately 500 rooms
- 121,513 square feet of retail, dining and nightclub space
- A total of 3,700 on-site parking spaces
- Significant open space and activation of the waterfront
- Remediation of a brownfield site
- An estimated 4,000 permanent jobs and approximately 4,000 temporary construction jobs

We note that several of the program elements have changed since the DEIR; in particular, the proposed number of parking spaces (for patrons) has increased from 2,909 to 3,700, an increase of approximately 27%. Employees will still be required to park off-site.

Massport's principal interests focus on the continued safe and efficient operation of Logan International Airport with a high level of customer service. In particular, we look to see that the FEIR carefully focuses on local and regional traffic and transportation, building heights as they relate to Logan Airport arrival and departure patterns, and lighting and potential solar glare that could be associated with building exteriors or solar panel arrays and energy utilization.

We further note that a successful casino resort will add significant new jobs to the regional economy; to the extent those service jobs overlap with airport jobs, it will be critical for Massport and the Wynn Everett project team to closely coordinate.

Massport submitted detailed comments on the DEIR to MEPA on February 14th, 2014. Attached to this letter is a summary of our previous comment, the proponent's response to our comment, and our rejoinder.

Traffic and Taxi Demand

Please note comments 8 and 10 on the attachment which concern the project's potential impact on taxi demand and traffic operations at Logan; we believe additional consideration of this matter by the Wynn team will be important. We also ask that the project team continue to work with Massport as their transportation planning evolves.

We offer comments on two additional topics below.

Building Heights, Solar Technologies and Glare

We have reconfirmed that the current building height as proposed is consistent with Massport's Boston Logan Airport Composite Map of Critical Airspace Surfaces. The Proponent will need to file a 7460 with the Federal Aviation Administration (FAA) for both the building(s) and temporary construction crane(s). Massport will continue to be engaged in the technical review of this project through the FAA 7460 process. We also encourage the project team to review FAA's Technical Guidance for Evaluating Selected Solar Technologies on Airports (Nov. 2010) as they move to finalize building design. 1

Labor Market/Jobs Creation

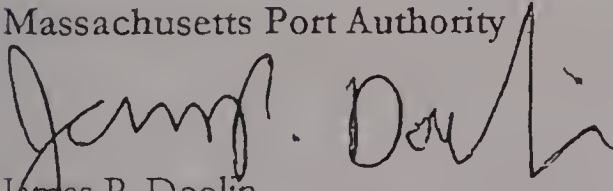
The FEIR still lacks a detailed analysis that shows the markets from which anticipated employees will be drawn, wage rates, job titles, and effects on neighboring communities and major employers including Logan Airport. It would have been useful if the proponent, as we requested, had analyzed the current and projected supply and demand for labor in the communities surrounding the proposed development. 2

Consequently, we reiterate our suggestion that well in advance of opening the proponent undertake a comprehensive analysis of the impacts associated with the creation of the estimated 4,000 permanent new jobs and 4,000 construction jobs; this level of employment has the potential to affect the labor pool for Logan Airport. This could include a comprehensive analysis of jobs created, type of jobs, wages and skills in the context of overall jobs created as well as the impact on the Logan Airport labor pool. This can be accomplished through the development of a workforce supply and demand model that estimates the workforce needs, skills required, wages and capture basin for the casino workforce when fully developed. This will allow for an analysis of the workforce catchment area and the likelihood of attracting and finding an adequate pool within the targeted capture geography. Existing and estimated future unemployment rates should be analyzed to determine if there is an adequate and available labor pool. We recommend a job training program that addresses any issues identified in the analysis. 3

Thank you again for the opportunity to provide comments and input to the FEIR review process. We look forward to continued coordination with the proponent.

Sincerely,

Massachusetts Port Authority


James P. Doolin
Chief Development Officer

Massachusetts Port Authority	
<p>Massport – 1</p>	<p>DEIR Comment: Since funding for the construction of these projects has not been programmed at the regional or municipal levels, the No Build and Build conditions could be analyzed both with and without these improvements in place in order to estimate the impact of the project that will exist in the event the reconstructions do not occur.</p> <p><i>Proponent’s Response:</i> The analyses presented in Chapter 4.0 includes conditions that reflect committed transportation improvements that are expected to be implemented by others within the analysis horizon year or that will be advanced as a part of or in conjunction with funding that will be available as a result of the project</p> <p>Massport (MPA) FEIR Rejoinder: The design horizon is noted in the DEIR and FEIR to be 2023. It was projected that the casino is expected to open approximately 3 years (36 months) after the casino license is awarded. Should the casino license be awarded in 2014, it follows that the casino may open in late 2017 (approximately 6 years prior to the design horizon). Thus, it is expected that the casino would be operating prior to and during construction of the roadway improvement projects. Ideally, the No Build and Build conditions would have been analyzed without these improvements in place to accurately assess the impacts from the casino that may exist until the completion of the roadway improvement projects.</p>
<p>Massport – 2</p>	<p>DEIR Comment: The only intersection between Route 99 and Logan Airport that was analyzed was the intersection of Chestnut Street at Williams Street. A more appropriate intersection to study in Chelsea would have been Williams Street at Spruce Street.</p> <p><i>Proponent’s Response:</i> The study area that was assessed in the DEIR and in Chapter 4.0 is consistent with the scope approved for the transportation analysis for the project and includes intersections and roadways that are expected to be materially impacted by the project. It is acknowledged that project-related traffic will traverse additional intersections beyond those assessed in Chapter 4.0, however, the resulting impacts are expected to be within the range of normal traffic volume fluctuations on a daily and seasonal basis.</p> <p>MPA FEIR Rejoinder: Even though the intersections proposed are located in direct routes to Logan Airport, the proponent notes that the study area has already been approved by MEPA and that they aren’t required to analyze other intersections. While MEPA had not included the intersection of William Streets at Spruce Street as part of the analysis, this intersection will be impacted by the project and it also serves as the east/west connector to Chelsea and Route 1A.</p>

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<p>Massport – 3</p>	<p>DEIR Comment: The daily traffic volumes presented in Table 4-2 were estimated based on applying a 'k factor' to the peak hour volumes of 6%. The typical 'k factor' to determine daily volumes based on peak hour volumes is between 8% and 10%. There is no discussion regarding the use of the atypical 'k factor'.</p> <p><i>Proponent's Response: The k-factor used to project daily traffic volumes from the peak-hour traffic counts is reflective of the traffic characteristics of roadways within the study area. Speed data was determined in relation to posted speed limits given the nature of the urban street network and the saturated traffic volume conditions.</i></p> <p>MPA FEIR Rejoinder: According to FHWA guidance, k-factors can be estimated using the values from nearby roadways with similar characteristics. The proponent could have listed the roadways used as reference to back up their estimation. Specifically, k-factors are determined by using an ATR unit to measure the volumes for every hour of every day for one year. The k-factor is the 30th highest hourly volume in the year divided by the Annual Average Daily Traffic (AADT). Typically this can be estimated by completing an ATR count for 48 hours, and dividing the peak hour by the average ADT between the two days. Speeds are typically determined by using an ATR unit during the same period the ADT volumes are being collected.</p>	<p>6</p>
<p>Massport – 4</p>	<p>DEIR Comment: MassDOT, as part of the MEPA review process for other casino DEIRs, has typically required casino submissions to include peak hour traffic volumes from typical weekdays (Tuesday, Wednesday, or Thursday). The peak hour traffic volumes contained in the DEIR were only collected on Fridays and Saturdays.</p> <p><i>Proponent's Response: The data collection protocol and time periods were developed in consultation with and approved by MassDOT to reflect peak design conditions for the project.</i></p> <p>MPA FEIR Rejoinder: While the data collection process was approved by MassDOT/MEPA, the typical weekday data could be used to validate the Friday and Saturday data used for the analysis.</p>	<p>7</p>
<p>Massport – 5</p>	<p>DEIR Comment: To determine the non-gaming related trip generation, three ITE Trip Generation LUCs were used; LUC 310 (Hotel), LUC 925 (Drinking Place), and LUC 820 (Shopping Center). The analyzed LUCs are appropriate, however determination of the square footages used to estimate trip generation was not discussed in this section.</p> <p><i>Proponent's Response: Chapter 4.0 includes additional information and analyses with respect to the trip-generation calculations for the project, including land uses, size and travel mode.</i></p> <p>MPA FEIR Rejoinder: The proponent has now included trip generation data sheets in the Appendix for Chapter 4.0.</p>	

<p>Massport – 6</p>	<p>DEIR Comment: Due to the offsite employee parking, the DEIR assumed that 0% of the employee trips will be in private vehicles. However, this is not practical as some employee parking will exist on site. Employees could also be dropped off at work via private vehicle (Kiss and Ride) which will generate drop-off/pick-up trips. The traffic volumes should assume a percentage of employee trips will be via private vehicles.</p> <p><i>Proponent's Response: Employee shifts will be scheduled such that shift changes do not coincide with the peak hour of roadway traffic. Employees will be prohibited from being picked up or dropped off at or near the Project site.</i></p> <p>MPA FEIR Rejoinder: Information on how the proponent plans to prohibit Kiss and Ride activity should be shared.</p>	<p>8</p>
<p>Massport – 7</p>	<p>DEIR Comment: The proposed site is located much closer to downtown Boston (approximately 3 miles) than the Aqueduct Casino is to Manhattan (approximately 12 miles). Therefore it is likely that a higher percentage of the auto trips will be via taxis due to the lower taxi fares, which may have potential impact to the Logan Airport taxi supply.</p> <p><i>Proponent's Response: Chapter 4.0 includes a revised and expanded assessment of taxi trips associated with the project.</i></p> <p>MPA FEIR Rejoinder: The study indicates that 8% of trips will arrive/depart via taxi. The proponent estimates that peak demand for casino taxis will be Saturday; the lowest demand for taxis at Logan is Saturday. Consequently, impact on Logan taxi operations is expected to be modest. The proponent plans to enter an agreement with the City of Everett that will allow taxis arriving from surrounding communities to pick up patrons at the casino. This is expected to reduce or eliminate deadheading. (Taxi operations are also addressed in Comment 10.)</p>	
<p>Massport – 8</p>	<p>DEIR Comment: In addition to the shuttle service, it should be expected that there will be taxi trips and rental car trips to and from the airport.</p> <p><i>Proponent's Response: Chapter 4.0 includes an assessment of projected-related trips that are expected to be oriented to/from Logan Airport, including taxi, shuttle and rental car trips.</i></p> <p>MPA FEIR Rejoinder: The proponent addressed taxi trips, water shuttle trips, and premium park and ride trips associated with Logan Airport activities. However, rental car trips were not explicitly addressed and may have been included in another category. Please clarify.</p>	<p>9</p>

<p>Massport – 9</p>	<p>DEIR Comment: Although the DEIR does not state so in writing, the proposed plan appears to have employees parking at existing MBTA stations. The employee trip distribution figure (Figure 4-50) shows shuttle service directly between the site and Wellington Station, Malden Center, and Beacham Street. It is unclear if the proponent had any discussion or coordination with the MBTA regarding these parking conditions. In addition, a parking study has not been conducted at these stations to determine the parking supply and whether the additional demand can be accommodated.</p> <p><i>Proponent's Response:</i> Chapter 4.0 includes a detailed discussion concerning employee parking at or proximate to MBTA facilities, including parking supply and availability as these conditions relate to projected demands. This evaluation was conducted in consultation with the MBTA and area parking operators.</p> <p>MPA FEIR Rejoinder: The FEIR indicates off-site employee parking at three locations: Station Landing in Medford (next to Wellington Station), two garages in downtown Malden, and one location in Everett (undetermined). The FEIR notes the proponent has agreements with managers of garages in Malden and Medford to lease these spaces, as well with as the individual communities with regards to Surrounding Community Agreements. The proponent is still in talks with property owners in Everett regarding a potential employee parking location. The Malden locations will provide 1,000 spaces and the Medford location with 800 spaces. The shuttles would run from each location and would allow employees in nearby neighborhoods to board en route to the casino. No additional shuttle services from Sullivan Square will be provided as the MBTA currently runs buses from this location.</p>
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<p>Massport – 10</p>	<p>DEIR Comment: Based on the Logan Airport Taxi Pool data, Logan experiences a shortage of taxis during the evening hours due to the heavy airline schedule for arriving flights. This coincides with the expected peak period for the casino. We can infer that additional demand of taxis due to the Wynn Everett Casino will have an impact to the taxi supply at the airport.</p> <p><i>Proponent's Response:</i> Chapter 4.0 includes a revised and expanded assessment of taxi trips associated with the project.</p> <p>MPA FEIR Rejoinder: The FEIR discusses the impacts to City of Boston taxis on a typical Saturday, and it did not discuss impacts to area taxis on Friday evenings when taxi demand is similar to Saturday. The proponent could perform additional demand analysis related to the proposed project's impact on taxi availability and operations at Logan Airport, and to identify mitigation, as appropriate. Massport requests additional discussion on this topic.</p>
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<p>Massport – 11</p>	<p>DEIR Comment: The project should consider Complete Street Design Criteria for the Rte. 99 (Broadway Street) improvements. The boulevard entrance plan may create conflict and safety issues with bicycle lanes due to the proposed free right hand turns that are proposed.</p> <p><i>Proponent's Response:</i> The planned roadway, intersection and traffic control improvements have been designed consistent with a Complete Streets design approach that provides adequate and safe accommodations for all roadway users, including pedestrians, bicyclists and transit riders.</p> <p>MPA FEIR Rejoinder: The proposed site plan follows a Complete Streets design approach, however the site plan (Figure 4-9 of the FEIR) requires bicycles to utilize existing crosswalks and sidewalks to access the site. The figure also shows that bicyclists attempting to enter/exit the site must cross three to four travel lanes to make a left turn. The use of a bike box at this intersection could be explored to assist bicyclists in making these maneuvers.</p>
<p>Massport – 12</p>	<p>DEIR Comment: The improvements should consider the addition of cycle tracks or protected bike lanes on Route 99 (Lower Broadway).</p> <p><i>Proponent's Response:</i> Cycle tracks and protected bicycle lanes will be reviewed for implementation along Route 99. Connections to the new Harborwalk from Route 99 will be designed to afford a minimum width of 10-feet and an ideal width of 12-feet where space permits to accommodate shared use of the walk by pedestrians and bicyclists.</p> <p>MPA FEIR Rejoinder: No further comment.</p>
<p>Massport – 13</p>	<p>DEIR Comment: The proponents could also consider establishing a Hubway Station on the site for use by employees and hotel guests.</p> <p><i>Proponent's Response:</i> The project proponent will coordinate with Hubway to locate a bicycle sharing station(s) at the project site.</p> <p>MPA FEIR Rejoinder: No further comment.</p>
<p>Massport – 14</p>	<p>DEIR Comment: Typical industry standards call for the completion of any traffic related improvements that are necessary to offset the traffic impacts of a development project prior to the project opening for operation. This could impact the trip assignments causing more traffic in the vicinity of Logan Airport.</p> <p><i>Proponent's Response:</i> The project proponent has committed to the completion of specific improvements to Santilli Circle as defined in Chapter 4.0 and reflected in the accompanying traffic analyses, including the reconstruction of the intersection as a grade separated interchange.</p> <p>MPA FEIR Rejoinder: The proponent has committed to constructing some of the proposed mitigation in the FEIR, but not all, prior to the proposed opening of the casino. Traffic impact in the vicinity of Logan Airport could be a concern if the improvements are not completed prior to the project opening.</p>

Massport – 15	<p>DEIR Comment: Since funding for the construction of off-site improvement projects has not been programmed at the regional or municipal levels, the No Build and Build conditions could be analyzed both with and without these improvements in place in order to estimate the impact of the project that will exist in the event the reconstructions do not occur.</p> <p><i>Proponent's Response: The analyses presented in Chapter 4.0 includes conditions that reflect committed transportation improvements that are expected to be implemented by others within the analysis horizon year or that will be advanced as a part of or in conjunction with funding that will be available as a result of the project</i></p> <p>MPA FEIR Rejoinder: No further comment.</p>
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August 11, 2014
Wynn Everett Casino
FEIR - Stationary GHG Sources
DOER Comments
JJ Ballam

The DOER recognizes the project for the scope, data and narrative as submitted regarding the quantification of the both the energy usage and the related GHG emission for both base and as-proposed design cases for the proposed buildings.

The DOER agrees that this project as an important opportunity to benefit the community of Everett though the establishment of buildings and grounds that are both functional and aesthetically pleasing. In addition, the DOER commends the project on both the number and degree of mitigations included in the as-proposed design and as listed in the Section 61 portion, which resulted in a significant reduction in the projected energy consumption and GHG emissions of the as-proposed building.

In particular, the DOER would like to acknowledge the commitment to include a 1 MW CHP system which is projected to achieve a very significant net source energy and GHG reduction for the project as a whole, and to provide an opportunity to include a very high degree of energy resiliency.

It is the intent of these comments to identify any issues that affect the accuracy or completeness of the methods as well as to point out areas and aspects of the design and proposed mitigation as described in the GHG section and as indicated by the modeling results that may present opportunities for further reductions in both energy usage and GHG emissions. Where these opportunities appear to exist, these comments also suggest measures and/or approaches that the DOER hopes will be considered for adoption in achieving further reductions in both energy and source GHG emissions.

Project Building Data:

The area functionalities and square footage are based on the information in the Table 1-1, page I-5 of the DEIR.

The EUI for the gaming areas were increased from CBECS 2003 averages for an assembly function in climate zone 2 to account for the projected 3241 MWH/yr base case plug load due to the gaming machines, as provided by Tech. Environmental in the EENF filing,

Model Block	Functional Area			Benchmark EUI 2003 CBECS ³	
	Usage (CBECS Usage)	SF	% Total	per Area	Area Weighted
PODIUM	Gaming (Assembly + machine loads)	167,880	22.6%	309	70.0
	Back of House (Conditioned Storage)	310,248	41.8%	76	31.8
	Retail (Retail)	89,140	12.0%	74	8.9
	Food/Beverage (Food Service)	57,591	7.8%	239	18.5
	Convention (assembly)	34,998	4.7%	91	4.3
	Gym (Office)	13,110	1.8%	115	2.0
	Front of House (Office)	57,339	7.7%	115	8.9
	Entertainment (Assembly)	11,774	1.6%	91	1.4
	Total Condition SF	742,080 ¹			145.8
HOTEL	Hotel Total	627,073 ²		100 ⁴	100.0
PROJECT	Total Condition SF	1,369,153			

Notes: .

- 1) The value for lodging located in US Climate Zone 2, which includes Everett, is 132.1. This value is reduced to 100 on the assumption that some functional areas (e.g. food service and public assembly) that would normally be included in a stand-alone hotel have been transferred to the project main building.

DOER's Use of the Energy Use Index (EUI)

The Energy Use Intensity (EUI) of a building represents the average annual total energy required by a building (in kBTU) on a per square foot per year basis, and is widely accepted as a standard by which a building's overall energy efficiency performance is be measured when normalized for climate and occupancy. The EUI and associated GHG emissions of energy code compliant building of equal area and occupancy type can vary widely due to differences in factors such as % glazing, ventilation loads, HVAC configuration, building envelope type, operating schedule, etc.

Given this fact, the DOER uses the results of the DOE's 2003 Commercial Building Energy Survey (CBECS) as a benchmark for comparison, in order to compare the projected performance of the performance of the proposed project buildings with the average performance of a population of existing similar buildings located in the same climate zone.

The US DOE maintains the CBECS which includes a data base of EUIs for a statistically significant population of commercial buildings, and publishes results of this survey sorted by occupancy for each of the US climate zones. All of Massachusetts is located in US climate zone 2. The most recent CBECS is the 2003 edition.

Projected Fuel Consumption (Energy) and GHG Emissions:

In order to better evaluate the performance of the as-proposed building's permanent assets, e.g. the envelope, lighting, air conditioning and heating distribution systems, the baseline and as-proposed cases for site energy consumption without CHP were considered separately from the baseline and the as-proposed cases with CHP included as a mitigation measure in the as-proposed case. Consistent with MEPA's practice, the results of the modeling with and without CHP were evaluated using the consumption of source (as opposed to site), energy using site to source fuel conversion factors provided by MEPA for this purpose.

Note: Per the rules of the 2010 ASHRAE 90.1 Appendix G (Performance) standard Table G3.1.1B requires that the baseline heating source be a hot water fossil fueled boiler, therefore CHP cannot be included in the baseline model.

Site Energy (Without CHP)

Podium Block:

The results of the building energy simulation modeling as shown in Table-4A are:-

Energy	Electric		Gas	Combined	EUI	Area Weighted Benchmark EUI	Δ% Model .vs. CBECS
	MWh	kBTU	kBTU	kBTU			
Baseline	16840	57458080	32240000	89698080	118	147	-20%
Proposed	13000	44356000	24760000	69116000	91		-38%
%Δ (proposed .vs .base)	-23%		-23%	-23%	-23%	-23%	
GHG Emissions TPY CO2	Indirect (Electric)	Direct (Gas)	Combined	Overall			
Baseline	6054	1886.04	7940	7940.020			
Proposed	4674	1448.46	6122	6121.960			
%Δ (proposed .vs .base)	-23%	-23%	-23%	-23%			

Hotel:

The results of the building energy simulation modeling as shown in Table 4B are:

Energy	Electric		Gas	Combined	EUI	Area Weighted Benchmark EUI	Δ% Model .vs. CBECS
	MWh	kBTU	kBTU	kBTU			
Baseline	15740	53704880	8967000	62671880	82	100	-18%
Proposed	12616	43045792	9170000	52215792	68	100	-32%
%Δ (proposed .vs .base)	-20%		2%	-17%	-17%		
GHG Emissions TPY CO2	Indirect (Electric)	Direct (Gas)	Combined				
Baseline	6139	524.57	6663				
Proposed	4920	536.45	5457				
%Δ (proposed .vs .base)	-20%	2%	-18%				

Whole Project

	Proposed			Base		Project
	Area	EUI	Project	EUI	Project	EUI Reduction (%)
Main	762,771	91	80	118	101	-26%
Hotel	641,273	68		82		
Combined	1404044.067					

Discussion:

Podium:

The DOER commends the project on achieving reductions in energy consumption for the as-proposed building when compared with the code compliant base case assembled in accordance with the ASHRAE 2007 Appendix G. However, it is possible that when an application for a building permit is submitted, the revised stretch code which will be based on 2010 ASHRAE 90.1 Appendix G will be in effect. Due to the increased performance requirements of this code, it is likely that the base case EUI will be lower, thus reducing the percentage reductions achieved by

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the current as-proposed design. Due to this, the DOER encourages the project to revise the model based on the the 2010 90.1 App G and to check whether the % EUI reduction is at least 15%.

Hotel:

Although the projected reduction in electrical consumption is very good, the DOER notes that the Hotel block is projected to use more gas than the baseline case. Although this may be in part due to the effect of analyzing a portion of what will be in reality a contiguous building, the DOER urges the proponent to look into this issue further and to evaluate which of the suggested possible measures listed below for attaining a incremental gain in in efficiency could be applied to reduce the Hotel gas consumption.

Combined Project:

The area-weighted reduction in the combined project's site EUI of 26% exceeds the minimum reduction to comply with SC and is a good result. The comments made above regarding the potential impact from the progression of the Mass. building energy codes apply to this section as well.

In addition to the many significant measures discussed in the submittal, the DOER offers The following suggestions based on the prescriptive and other as-proposed mitigations (refer to the Mitigation section below)

Increase the R-Value of the roof to R-30

Oversize the Cooling Tower: Increase heat transfer capacity to supply 75F condenser water during peak cooling intervals.

Select Condensing Hot Water Boilers with an AFUE of at least 87%

Use Variable Speed Drives for all major circulating pumps and fans (including the cooling tower fans)

Reduce Project Average LPD:

It is stated in chapter 6 that the project intends to achieve an overall reduction in LPD of 20%. The overall reduction as shown in the table of modeling input values is 15%. The DOER encourages the proponent to attain at least a 20% reduction in the final design.

Reduce Pressure Drops in the Water and Air Distribution Systems.

Once the site electrical load has been minimized, the DOER suggests the following measures to reduce that fraction of grid supplied electricity:

Increase the Size of the Solar PV system by mounting panels on canopies covering the open parking areas:

Install sufficient energy sub-metering such that building operations can be tailored to actual usage patterns to provide the maximum efficiency.

Quantification Using the Source Energy Path Option

As was discussed in the DOER’s comments to the DEIR, the current Mass. Stretch Building Energy Code (the Stretch Code) is base on site energy consumption. Due to this the electricity generated by a CHP system is not separated from the electricity consumption that is supplied by the grid. However, as the fuel gas for the CHP system is consumed on site, it is counted against the overall site’s energy consumption. This protocol does not allow for the quantification of the either the CHP system’s source and site energy savings produced by the transfer of useful heat which is a by-product of the generation of the electricity, nor does it allow for the quantification of the reduction in net source GHG emissions due to combustion of clean fuel and the overall greater system efficiency. In recognition of this issue, MEPA has adopted an optional path and protocol for the quantification of both energy consumption and GHG emissions for stationary sources that uses a source energy and GHG path. In response DOER-11 in the FEIR, the proponent has described the application of this option and protocol to this project. In main, with slight differences, the DOER is in agreement with both the method and the results. For purposes of clarity, the DOER has recapitulated the narrative of the response DOER-11 in a tabular form:

Model Projected Site Energy Consumption Converted to the Source Energy with the 1 MW CHP System Included in the As-proposed Case.

Source Energy	Electricity				
	Site Total	CHP MWH Output	Site Grid	Source Grid	
	MWH	MWH	MWH	MWH	kBTU
Baseline	32580	0	32580	98066	334600510
Proposed	25616	9081	16535	49770	169816434
%Δ (proposed .vs .base)	-21%				-49%

Source Energy	Gas					EUI
	Boiler No CHP	CHP Heat Output	Boiler with CHP	CHP gas	Source Total	
	kBTU	kBtu	kBtu	kBtu	kBTU	
Baseline	41207000	0	41207000	0	44915630	498
Proposed	33930000	35632000	0	89247000	97279230	350
%Δ (proposed .vs .base)	-18%				117%	-30%

Source Path GHG Emissions TPY CO2	Indirect (Electric)		Direct (Gas)	Combined
	Site Grid	Source		
Baseline	14661	35300	2627.56	52589
Proposed	7441	17916	5690.83	31047
%Δ (proposed .vs. base)	-49%	-49%	117%	-41%

Note: Based on the revised, and lower, heating demand and gas consumption resulting from the current modeling, heat generated by the CHP system will more than full satisfy the overall annual heating load of the building. Based on this, in these calculations the excess heat was transferred to the absorption chiller with an assumed COP of 0.70. The cooling energy produced displaced 321 MWH of electric chiller electric consumption and this 321 MWH was added to the overall displaced grid electricity.

Mitigation:

Based on the information included in Table 10 of the GHG analysis, the prescriptive and other mitigation measures applicable to the as-proposed building assets are:

Measure/Area	207 90.1 Prescriptive or App.G, or Other	Proposed	% Improvement
Roof R-value	20	24	20%
Area Window/Area Wall			
Tower	0.4	0.6	-50%
Podium	0.4	0.35	13%
Window U-value	0.55	0.45	18%
Walls R-value	20	20	0%
Chiller kW/Ton	0.576	0.518	10%
ERV Effectiveness			
Podium	none	0.75	+
Tower	none	none	
DCV			

Measure/Area	207 90.1 Prescriptive or App.G, or Other	Proposed	% Improvement
Podium (Gaming, Entertainment, Retail)	none	Yes	+
Tower	none	none	
Boiler	0.8	not shown	
LPD - By Space			
Gaming	not shown	not shown	
Restaurant	0.65	0.55	15%
Offices	0.95	0.7	26%
Retail	1.68	1.43	15%
Hotel	1.11	1	10%
Warehouse	1.11	1	10%
		Avg. LPD Improvement	15%
Efficient Refrigeration		yes	15%

Additional Mitigation:

On-Site Clean Generation which Displaces Grid Electricity

- 1) A 1 MW system with a 750 T absorption chiller
- 2) An 800-850 kW PV Solar Energy System

These two measures combine to provide an on-site clean power peaking capacity of 1.8 MW.

Procurement of Low Energy Gaming Machines

Energy Resiliency:

One of the most important potential attributes of a CHP system is the potential to provide energy resiliency during an unplanned grid outage. In order for the system to be able to realize this potential, the CHP system and the interconnection with the utility electrical grid must be designed to be able to start and to operate generating electricity, heating and cooling, during periods when the power grid is de-energized. This requires that the CHP be able to black start (i.e. start without a live connection to the grid) and be able to operate safely in an islanding mode (i.e. deliver energy to the facility while electrically isolated from the grid). The DOER urges the proponent to include in the FEIR a commitment to a CHP system that it will be designed to be able to both black start and operate in an island mode.

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In addition, in order for the CHP system to deliver resiliency, the central plant and critical electrical & mechanical equipment, as well as gas control valves must be located such that they will remain dry and operable in the event of storm caused flooding.

City of Everett

Office of the Mayor



Carlo DeMaria, Jr.
MAYOR

Everett City Hall
484 Broadway
Everett, MA 02149-3694
Phone: (617) 394-2270
Fax: (617) 381-1150

August 7, 2014

Secretary Richard K. Sullivan Jr.
Executive Office of Energy and Environmental Affairs (EOEEA)
Attn. MEPA Office
100 Cambridge Street, Suite 900 (9th floor)
Boston, MA 02114
EOEEA# 15060

Dear Secretary Sullivan:

I am excited to provide this comment letter and my strong support for the proposed Wynn Everett project (EOEEA# 15060) as presented by Wynn MA, LLC, outlined in the Final Environmental Impact Report (FEIR) dated June 30, 2014. This project represents possibly the largest, most comprehensive and transformative project in Everett and the region's history. The \$1.6 billion investment located off of Horizon Way, includes the single phase construction of a Category 1 State licensed gaming facility, with over 3 million square feet of new development on a 33.9 acre, former Monsanto Chemical Company, harbor-front property. The ability to redevelop this highly contaminated site is a great step forward for the City of Everett, highlighting our priority need of creating a high quality waterfront environment for the region that is accessible to all residents of this proud community.

As noted in the City's DEIR comment letter, in November 2013, the Wynn MA, LLC development team approached the City of Everett inquiring about the potential redevelopment of the former Monsanto Chemical Company site. Upon learning about Wynn and the proposed project, I whole-heartedly supported this project, a sentiment shared by my fellow Everett residents, who in June 2013 voted nearly 87 percent in support of the Wynn MA, LLC development. Throughout the past nearly 2 years, I have been consistently impressed with Wynn's willingness to work with my administration to address many of the City's concerns through the project review process. Wynn has consistently proven to be progressive open, cooperative, and balanced in their approach to this unique public/private partnership.

Since the beginning of the City's partnership with Wynn, many potential benefits and impacts from the proposed project have been at the forefront of our review. While traffic and transportation are naturally the most critical components of the project to review, many other aspects must also be considered with

this project. Many of these were discussed in the City's DEIR comment letter, and are reiterated here, since they are clearly of utmost importance to the City. These include:

- **Economic Benefits:** Not only will the Wynn MA, LLC project inject well over \$1 billion in private investment into the region, but the project will create an estimated 4000 construction jobs and 4000 permanent direct jobs, many of which are well-suited to the region's skilled and hard working population. To capitalize on this investment, the City has also negotiated local preference hiring standards, minimum requirements for local vendor use, and has re-written the local zoning for the Lower Broadway neighborhood (approved in November 2013) surrounding the property to capitalize on urban-scale, high quality spin-off development.
- **Local Planning and Land Use:** The Wynn MA, LLC project fully embraces the City's Lower Broadway District Master Plan, completed in 2012. This plan highlights many of the needed transportation improvements, land-use controls (zoning, Municipal Harbor Plan), and long-range vision for the Lower Broadway neighborhood. In particular, the acknowledgement of a large-scale mixed-use redevelopment at the former Monsanto Chemical Company site is at the heart of the neighborhood's desired future vision. The partnership with Wynn MA, LLC has and will continue to progress many of the short and long-term initiatives of this plan.
- **Public Amenities & Open Space:** From the earliest discussions with Wynn MA, LLC, the City insisted that the site's redevelopment include clear and unimpeded access to an active waterfront open space. This is outlined in both the City's Host Community Agreement (HCA) with Wynn, and is required in the Everett Central Waterfront Municipal Harbor Plan (MHP). As such, the City is confident that the Wynn MA, LLC development as outlined in the FEIR will provide the desired public amenities and active open space experience available to all Everett residents that will be connected with existing open space amenities within the community.
- **Multi-Modal Access and Accommodations:** Providing diverse transportation access to the site is a priority for Everett. The Wynn MA, LLC proposal embraces this priority, accommodating cyclists and pedestrians with a new harbor walk connected to existing public parks, roadway networks, and other regional infrastructure (such as the Bike to the Sea path). Public transportation access to the waterfront is also provided, and highlighted with a proposed ferry service system. Finally, the City and Wynn are continuing to study the potential for either a commuter rail flag-stop to the existing Newburyport/Beverly line that abuts the property, and/or a continuation of the Silver Line BRT currently proposed to extend into Chelsea within a few miles of the Lower Broadway neighborhood.
- **Environmental:** The project as proposed will remediate and actively re-use a former Monsanto Chemical Company site – a site that is highly contaminated and has been an eyesore on the region's waterfront for generations. Given the contamination issues with the site, the City is fortunate to have a comprehensive redevelopment project that will re-activate this vacant brownfield at virtually no cost to the City or the State. Further, the project will incorporate creative measures at promoting a cleaner future for the site and surrounding water ecosystem, including cleaning the site's waterfront areas from contaminated debris, and incorporating a living shoreline into the project.
- **Green/Sustainability:** As required by the State gaming legislation, the proposed Wynn MA, LLC project will be constructed as one of (if not the) most sustainable gaming establishments in the country, striving for LEED Gold Certification or higher. The City applauds this requirement, and is working with Wynn to ensure the project meets and exceeds these requirements. Further the project seeks to complete many sustainable initiatives, including constructing a photo-voltaic system and

incorporating many “green” components into the construction of the project to curb energy and water dependence.

As noted above and in the City’s DEIR comment letter, traffic and transportation are the most critical aspects of the Wynn MA, LLC project. From the beginning of this project, the City and Wynn have met regularly to review nearly every aspect of the traffic and transportation program. Throughout this process, the City continues to become confident that the mitigation program for this project as outlined in the FEIR will improve conditions within the City and the larger region, fixing many of the chronic issues crippling the surrounding roadway network. The City is continuing its review of the proposed mitigation plan, and offers the following comments regarding the Wynn MA, LLC FEIR.

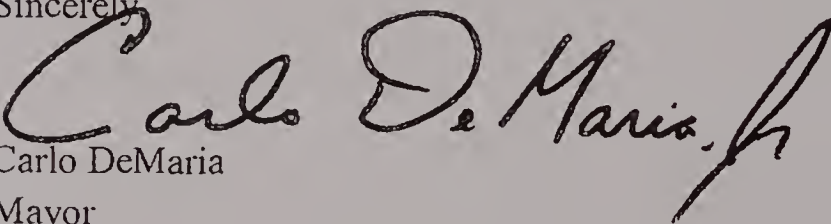
1. The traffic analysis presented in the FEIR omits detailed discussion of Main Street and upper Broadway in the City of Everett. As the City has indicated to the Wynn team throughout the project development process, mitigation for the project should include improvement of the traffic signal system along Main Street to provide coordinated traffic control, allowing for safe and efficient movement of vehicular and pedestrian traffic along this corridor. In addition to upgrading existing signalized intersections, the installation of a new signal at the currently un-signalized intersection of Main Street with Linden Street should be considered to mitigate increases in delay at that location reported in the DEIR. 1
2. As part of its mitigation program along Revere Beach Parkway, Wynn should provide upgrades to crosswalks and sidewalks to bring signalized intersections into compliance with ADA and AAB guidelines, including investigation of improved traffic signal phasing for pedestrians and shortening of crossing distances. 2
3. The post-development transportation monitoring program within the City of Everett listed in Section 4.17 of the FEIR is limited to lower Broadway, Sweetser Circle, and Santilli Circle. The geographic extent of the monitoring program must be expanded to measure impacts along the Main Street and upper Broadway corridors, as well as along Revere Beach Parkway between Sweetser Circle and the Chelsea city line. At a minimum, the monitoring program should be expanded to include Broadway at Ferry Street, Broadway at Chelsea Street/Norwood Street, Main Street at Tileston Street/Oakes Street, and Revere Beach Parkway at Second Street. Additional locations may be required once satellite parking locations are finalized. 3
4. Nearly one third of all project-generated trips will pass through Sweetser Circle. As part of the reconfiguration of Sweetser Circle, railings, curbs, sidewalks, lighting, pedestrian signals, and landscaping should be upgraded to provide a comprehensive rehabilitation of this critical location. Additionally, the existing pavement surface on the Broadway bridges over MBTA is in poor condition and should be rehabilitated as part of the Sweetser Circle improvement. 4
5. To improve non-motorized access between the site and points north, Wynn should, pending agreements with MBTA, extend the Bike-to-the-Sea trail along the MBTA right-of-way beneath Revere Beach Parkway to the Wynn site as part of the Santilli Circle improvements. Please note that this ROW is owned by the MBTA, and therefore close coordination and cooperation with MBTA is needed. 5
6. Shuttle routes and the location of satellite parking lots within the City of Everett have not yet been identified as of the submission of the FEIR. Wynn must continue to work closely with the City in the establishment of these routes and ensure that any potential increases in traffic along these routes or in

the vicinity of proposed satellite parking is adequately accommodated. This includes safe and efficient access and egress as well as circulation and a sufficient parking supply. All on-street shuttle stops and primary pedestrian routes to shuttle stops must be fully compliant with ADA and AAB guidelines. 6

7. All proposed transportation infrastructure improvements in the City of Everett shall be subject to review and approval by the City prior to construction. Further, Wynn has indicated their commitment to ensuring the final design of proposed mitigation measures be reviewed at a series of public workshops where stakeholders will be able to provide input on the final proposed designs. 7

Thank you for the opportunity to comment on and provide strong support for the Wynn MA, LLC project as outlined in the FEIR. This is an historic opportunity for the City of Everett to reconnect with its waterfront, improve its aging transportation network, provide jobs and economic opportunity to its working population, and advance a transformative economic development project for not only the City but for the region as a whole. Please do not hesitate to contact me if you have any questions regarding the comments noted above.

Sincerely,

A handwritten signature in black ink that reads "Carlo De Maria" with a stylized flourish at the end.

Carlo DeMaria

Mayor



City of Medford

OFFICE OF THE MAYOR

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MICHAEL J. MCGLYNN
MAYOR

August 7, 2014

Secretary Maeve Vallely Bartlett
Executive Office of Energy and Environmental Affairs
Attn: MEPA Office/MEPA Reviewer
100 Cambridge Street, Suite 900
Boston, MA 02114

RECEIVED

AUG 08 2014

RE: Final Environmental Impact Report, Wynn Everett

Dear Secretary Bartlett:

Please accept these comments on behalf of the City of Medford regarding the Final Environmental Impact Report (FEIR) submitted for the proposed Wynn Everett casino project. I appreciate the opportunity to share with you the critical mitigation needs that must be addressed by Wynn MA ("the Proponent") so Medford residents can enjoy their vibrant community for years to come.

As a surrounding community for the Wynn Everett project, the City of Medford is looking to make the project work as the Proponent promises, "...a vital public gathering space and economic engine for the region."¹ To do so, my office has analyzed the FEIR from a "Medford-first" perspective. I have found that more serious mitigation commitments must be made by Wynn MA to ensure that mobility and economic growth in the city are not hampered by the casino project. This conclusion is bolstered by findings in the letter written by the City's traffic consultant, Greenman-Pedersen, Inc., which is attached to remarks by the City's Office of Community Development. In their opinion and mine, the most pragmatic mitigation strategy begins with a grade-separated solution to the roadway at Wellington Circle.

GPI reports numerous traffic issues to be further addressed by the Proponent in coordination with local and state agencies, but I wish here to address three of my primary concerns:

1. *Inadequate mitigation at I-93 SB Exit 31 Off-Ramp to Mystic Valley Parkway*

¹ Wynn Everett Final Environmental Impact Report. Page I-2

2. *Unclear Impact of Off-Site Employee parking at Station Landing Garage*
3. *Inadequate mitigation commitment at Wellington Circle*

These items are further discussed below. Please refer to the letter submitted by GPI engineering team for technical details and all other concerns raised by traffic engineers. 3

1. *Mitigation at I-93 SB Exit 31 Off-Ramp*— Project-related traffic will exacerbate congestion for drivers in Medford as well as the tens of thousands of I-93 drivers whose morning commutes are already encumbered by the overflowing queues at Exit 31 every day, especially at the vital left-turn towards Wellington Circle and ultimately the Project Site. Regional mobility and growth, therefore, relies on the Proponent's willingness to deliberately address what has been identified as a major problem in the FEIR but disappointingly has been left without a viable solution under the currently proposed mitigation plan. Even with proposed signal optimization, the intersection is projected to provide an inadequate service level. The City requests a more robust physical mitigation strategy at this intersection. 4
2. *Traffic Impact of Employee Off-Site Parking at Station Landing Garage*—The FEIR does not adequately estimate the traffic impact entailed in Medford's service as a transportation hub—the FEIR projects the use of up to 800 parking spots at the Station Landing Garage, in the heart of Wellington Circle. However, the FEIR seemingly does not account for traffic impacts of those additional vehicle trips as well as the shuttle bus trips. While Medford understands the goals of Wynn's Transportation Demand Management program, any additional vehicle trips at Wellington Circle must be met with additional mitigation commitments. Unaccounted-for employee vehicle trips would cause unbearable stress on Wellington Circle's already fragile, and under a Build scenario, quickly degrading, transportation capacity. The City requests the Proponent clarifies, revises, and further analyses their traffic estimations to better reflect reality. 5
3. *Inadequate Mitigation Commitments at Wellington Circle*—Even under the revised mitigation strategy involving lane additions and signal optimization at Wellington Circle, numerous intersections are projected to operate worse under Mitigated Build conditions than under No-Build conditions, and many more worse than current. Furthermore, as GPI notes, the projected capacity benefits of proposed lane additions "...may be overstated as reported in the FEIR. These additional lanes will be added to an exceptionally wide roadway cross-section."² Even under the Proponent's optimistic projections, the proposed mitigation strategy at

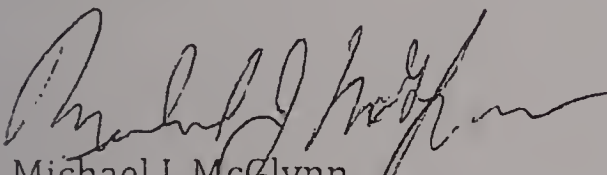
² GPI Letter to Mayor Michael J. McGlynn, August 6, 2014. Page 4.

Wellington Circle is inadequate. The City requests further commitment to a grade-separated roadway solution. 6

Wellington Circle and nearby roads also represent a primary concern to citizens in surrounding communities. A Wellington Circle that operates over capacity with failing service levels, long queue lengths and delay times is a threat to local and regional development that cities, towns, and the state have worked hard to promote. Therefore, I recommend you urge the Proponent to strengthen their commitments beyond current proposals. Furthermore, the Proponent should be compelled to further action on all concerns and recommendations contained in the GPI letter.

Thank you again for the opportunity to comment on this important matter. Should you have any questions or require further information, please do not hesitate to contact my office at (781) 393-2408.

Sincerely,



Michael J. McGlynn
Mayor



LAUREN DiLORENZO
Director

City of Medford

OFFICE OF COMMUNITY DEVELOPMENT

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August 6, 2014

Secretary Maeve Valley Bartlett
Executive Office of Energy and Environmental Affairs
Attn: MEPA Office/MEPA Reviewer
100 Cambridge Street, Suite 900
Boston, MA 02114

RECEIVED

AUG 08 2014

MEPA

RE: FEIR Wynn Everett

Dear Secretary Bartlett:

Please consider these comments submitted on behalf of the City of Medford as you review the FEIR for the proposed Wynn Everett project. The FEIR continues to raise impacts that require mitigation to ensure the quality of life for our residents is not adversely effected, economic development is not restricted and travel remains safe.

The FEIR has adjusted for the earlier failure to properly account for traffic during the build condition at the intersection of Route 93 and Mystic Valley Parkway. Current and Build scenario impacts are proposed to be mitigated by signal timing changes. The proposed timing changes will favor exiting Route 93 traffic but will still cause significant delays and likely backup to Route 93. The signal time will further exacerbate anticipated problems from Harvard Street to Mystic Valley Parkway. The Proponent fails to acknowledge the deleterious effects on the South Medford neighborhood and Mystic Avenue business area. These issues must be addressed prior to occupancy. 1

Of continued concern is the exacerbation of traffic and safety issues at Wellington Circle. Proposed Mitigation includes geometric improvements and signal timing improvements. The creation of additional lanes at Wellington Circle is ill conceived. This area is already extremely difficult to navigate and unsafe. The plan also continues to neglect pedestrian safety in this area. The below grade separated roadway must be advanced prior to occupancy of this project. 2

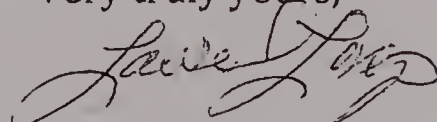
The proposal by the Proponent to utilize up to 1,000 off-site parking spaces for employees was first raised in the DEIR. The FEIR does not adequately address the traffic impacts to the Wellington Circle Area. The FEIR also does not assure that existing MBTA Park and Ride Spaces will not be replaced with employee parking.

This is of particular concern due to the delayed extension of the Green Line to Medford and the proposal of the MBTA to offset impacts by the creation of Park and Ride spaces in Beverly and Salem. Air Quality in Medford should not deteriorate due 3 to the delay in the implementation of necessary transportation improvements or the addition of unnecessary vehicles for employees who have traveled to the area by vehicle.

The City requests that the Proponent be responsible for additional mitigation at the noted intersections, provide long term monitoring of intersections within the City 4 by an independent party, and fund the construction of any improvements necessary to offset any unforeseen impacts.

Attached to this letter is a copy of the peer review conducted by the City's consultant, Greenman - Pedersen, Inc. Their comments and recommendations are incorporated as part of this letter. Thank you for your consideration of these comments.

Very truly yours,



Lauren DiLorenzo, Director

Attachment

Cc: Michael J. McGlynn, Mayor
Marc Draisen, Executive Director
Metropolitan Area Planning Council



REF.: MAX-2013011.04

August 7, 2014

Mayor Michael J. McGlynn
City of Medford
85 George P. Hassett Drive, Room 202
Medford, Massachusetts 02155

ATTENTION: Ms. Lauren DiLorenzo

SUBJECT: City of Medford
Wynn Everett FEIR
Transportation Peer Review

Dear Mayor McGlynn:

As requested, *Greenman-Pedersen, Inc. (GPI)* has conducted a transportation peer review of the Wynn Everett Casino (Project) Final Environmental Impact Report (FEIR) prepared by Fort Point Associates, Inc. The focus of this review is Chapter 4 – Transportation - of the FEIR prepared by Vanasse & Associates and Howard/Stein-Hudson Associates, Inc. (VAI/HSB). GPI has reviewed the projected traffic impacts within the City of Medford and the adequacy of the proposed mitigation to address these impacts. Additionally GPI has evaluated the responses to the comments raised by GPI in our previously submitted peer review of the Draft Environmental Impact Report (DEIR) submission dated January 8, 2014.

Pertaining specifically to the City of Medford, GPI continues to find notable unaddressed mitigation needs related to Wellington Circle (Intersection #42) and the Harvard Street/Mystic Valley Parkway (Route 16)/Mystic Avenue (Route 38)/I-93 Exit 31 Southbound Off-Ramp cluster of intersections (Intersection #'s 37, 38 & 39). In addition, GPI has identified concerns regarding the Transportation Monitoring and Reporting Program and the trip distribution methodology which may be under-representing the impacts to roadways within the City of Medford.

As discussed in further detail below, GPI recommends the implementation of physical mitigation measures to address Project impacts at the locations identified above prior to the opening of the Wynn Everett Casino, as well as ensuring the viability of the proposed traffic monitoring program. The intent of the traffic monitoring program would be to identify any unanticipated traffic impacts post Casino opening which would then be the responsibility of the Casino Proponent to mitigate.

Mayor McGlynn
August 7, 2014
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PROJECTED TRAFFIC IMPACTS

The utilization of roadways within the City of Medford to access/egress the Project site will cause measurable impacts at key locations, specifically during the critical evening and Saturday peak hours. As discussed in detail below, these unaddressed impacts raise concern regarding the impact to local and regional mobility and the potential for vehicles to seek alternate “cut-through” routes through the City of Medford to access/egress the Project site.

Intersections 37 & 39 - Mystic Valley Parkway (Route 16)/I-93 Southbound Exit 31 Off-Ramp

Within the previously submitted traffic peer review on the DEIR, GPI noted a significant oversight within the transportation impact analyses related to the projected Build impacts on operations at the intersection of Mystic Valley Parkway (Route 16)/I-93 Southbound Exit 31 Off-Ramp (FEIR Intersection 39). This oversight involved the exclusion of the predicted project-trips utilizing the southbound left-turn at the intersection in order to access the Project under future Build conditions. This oversight translated to negligible project-related traffic impacts being reported at this critical intersection; however these analyses did not represent actual impacts as it did not align traffic volume projections stated within the DEIR.

In the FEIR this comment has been addressed to provide actual project-related impacts at this key intersection. Proposed mitigation at this location involves signal timing/phasing adjustments, while proposing no physical geometric changes to this intersection. The FEIR projects an increase in 109 and 132 vehicle trips on this critical left-turn movement during the Friday evening and Saturday afternoon peak hours, respectively. This represents an overall increase in traffic volumes of 8% and 12% during the peak hours, when comparing to the future No-Build at this location.

The Proponent has proposed to optimize signal timing and phasing at the intersection in order to improve traffic operations for the 2023 Build Mitigated Condition. Though the proposed mitigations do improve overall capacity at the intersection during the Saturday afternoon to a LOS C, the intersection will continue to operate at an undesirable LOS E during the Friday evening peak period.

Further evaluation reveals that the Route 16 Southbound Connector approach is currently operating at a LOS F and LOS E during the respective Friday evening and Saturday afternoon peak periods, and will continue to do so under the 2023 No-Build Condition. Under Existing Friday evening conditions the Mystic Valley Parkway Southbound Connector left-turn operates over capacity ($v/c = 1.08$) at LOS F with 91.4 seconds of delay. Average queues extend back 525 feet with 95th percentile queues extending to 657 feet and have the ability to extend onto the adjacent I-93 Exit 31 off-ramp. Under future Build conditions this movement operates at ($v/c = 1.17$) at LOS F with 120.9 seconds of delay. Average queues are reported to now extend back to 657 feet with 95th percentile queues reported at 793 feet, nearly back to the I-93 mainline. The

Mayor McGlynn
August 7, 2014
Page 3 of 7

queues however are caveated with the acknowledgment that as the volume on this approach exceeds capacity the actual queues may be longer than reported. Regardless it is clear that there will be a significant compounding effect when any additional traffic is added to an already failing movement. Given the close proximity of the I-93 SB mainline this is a significant concern to not only the City of Medford but also MassDOT as it may impact regional mobility. MassDOT should explicitly weigh in on this concern as this is new information not available at the DEIR.

The build conditions reported above are also representative of signal timing optimization of this coordinated signal cluster. These improvements are essentially intended to shift capacity from the east/west movements along Mystic Valley Parkway and Harvard Street to accommodate the increase in demand from traffic exiting I-93 onto the Route 16 Southbound connector. While we have noted the limitation of these improvements above as they pertain to I-93 and the Route 16 Southbound Connector, these modifications will also significantly deteriorate operations along Mystic Valley Parkway westbound and Harvard Street. Mystic Valley westbound left-turns at Route 38 would degrade from LOS D to E. Mystic Valley westbound through movements would degrade from LOS E to F with an increase of 20 seconds of delay and result in the demand exceeding capacity along this approach. Most notably Harvard Street, a roadway of particular concern to the City of Medford, would degrade from LOS D to F with an increase of nearly a minute of delay, a volume to capacity ratio that increases from 0.75 to 1.07 and an increase of over 100 feet of 95th percentile queue length.

Given the critical nature of this location to both regional and local mobility it is apparent that more significant, physical improvements are warranted. These should both ensure to MassDOT's satisfaction that I-93 SB operations would not be impacted by vehicle queues from this location and that City of Medford and Department of Conservation and Recreation (DCR) infrastructure is not unduly degraded. GPI recommends that the proponent commit to working with all stakeholders, MassDOT, the City of Medford and DCR, to develop and implement a mitigation plan that appropriately balances regional and local mobility needs. 1

Finally, upon exiting I-93 SB the FEIR projects 100% of this project traffic will turn left to remain on the Mystic Valley Parkway to proceed onward to the project site. Consideration should be made for those who may travel west along Harvard Street to access Broadway southbound toward the Project Site. Likewise, concerns remain regarding the potential for cut-thru traffic utilizing Route 38 and Harvard Street to access I-93 to the north to avoid congestion on Alford Street (Route 99) and Sullivan Square. 2

Intersection 42 - Wellington Circle

Within the previously submitted traffic peer review on the DEIR, GPI noted insufficient mitigations within the transportation impact analyses related to the projected Build impacts on operations at the Wellington Circle. In the FEIR this comment has been addressed, however the

Mayor McGlynn
August 7, 2014
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Proponent continues to propose minimal at-grade geometric improvements to the intersection. The Proponent proposes to provide an additional through travel lane on both Route 16 approaches, an additional left-turn lane on the Route 28 northbound approach, and traffic signal timing and phasing optimization.

Wellington Circle is a location of longstanding regional congestion. While a notable amount of additional degradation to traffic operations is expected over the next 10 years regardless of the Wynn Everett project, the addition of Project generated traffic will have a significant compounding effect that needs to be mitigated prior to the opening of the Project. Medford continues to request consideration for a grade-separated solution, which GPI considers appropriate given the magnitude of the needs at Wellington Circle. 3

Wellington Circle is projected to experience an increase of 179 and 259 vehicle trips during the Friday evening and Saturday afternoon peak periods, respectively as a result of the Project. It is clear given the constraints to mobility this location currently represents that the projected operations will have significant adverse impacts to regional mobility and congestion. In recognition of this the Proponent has now committed to implementing geometric improvements at this location in addition to optimizing signal timings and phasing. These improvements consist of providing an additional through travel lane on both Route 16 eastbound and westbound approaches and an additional left-turn lane on the Route 28 northbound approach. These improvements would have noted beneficial impacts by reducing vehicle delays and queues along various approaches. It is the opinion of GPI however that the benefits of this additional capacity may be overstated as reported in the FEIR. These additional lanes will be added to an already exceptionally wide roadway cross-section. The utilization and effectiveness of these lanes will be limited by the overall congestion of Wellington Circle and upstream and downstream constraints. In short the analysis presents an idealistic micro-scale analysis where a broader macro-scale solution is warranted. At a minimum GPI suggests that in addition to these improvements the Proponent fund a 25% level grade separated design for Wellington Circle to be utilized in the future should conditions warrant. 4

OFF-SITE PARKING

The FEIR states that an on-site underground parking garage will provide 3,700 parking spaces for patrons and executives and the Proponent will lease additional spaces at three off-site parking facilities to accommodate employees. Of the three proposed parking facility locations, up to 1,000 spaces are proposed within the City of Malden with up to 800 additional spaces within the City of Medford at Station Landing (Wellington Station). The FEIR states the Proponent has confirmed with the operators that sufficient capacity is available at the potential lease locations, though no documentation has been provided regarding the parking at Station Landing.

Mayor McGlynn
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Employee shuttle busses are proposed to provide a connection for employees from these locations to the Project. Proposed shuttle bus routes are provided within the FEIR and demonstrate the use of Commercial Street in Malden, which transitions to Rivers Edge Drive in Medford to access the Project from the Malden parking locations. Similarly, proposed shuttle routes to access parking at Station Landing demonstrate the use of both Rivers Edge Drive and Wellington Circle. In addition it is unclear if the traffic impact analyses within the FEIR consider the employee travel patterns for those utilizing alternative roadways to access the proposed off-site parking locations. 5

GPI would like to see further analyses of the merge sections at the intersection of Mystic Valley Parkway (Route 16) at Rivers Edge Drive in order to evaluate the impacts associated with employee shuttle routes and employees vehicles traveling from Malden and Station Landing. The Proponent has committed to schedule employee shifts at the Project to ensure that no employees need to travel to and from the off-site employee parking locations during the weekday evening peak hours of 4:30 PM - 6:00 PM. This is a new commitment not previously considered in the DEIR. Therefore any vehicular traffic impacts associated with the employee off-site parking locations were not analyzed for the FEIR. While 4:30 - 6:00 PM may be the critical evening peak period, these roadways experience noted congestion for a much broader period of time. Not understanding the impacts this additional employee traffic may impose on the local roadway network within the City of Medford during these periods potentially masks additional impacts. It is requested a more thorough analysis of this traffic analysis be presented even if it represents an off-peak condition (6:00 – 7:00 PM or 3:30 - 4:30 PM). 6 7

TRAFFIC MONITERING

Within the previously submitted traffic peer review on the DEIR, GPI commented on the need for a Transportation Monitoring and Reporting program. In the FEIR this comment has been addressed to provide a post-development transportation monitoring and survey program of employees and patrons. The program is proposed to commence upon initial occupancy of the Project and would continue for a five year period after full occupancy. Though the monitoring and survey program does fulfill the request of GPI, it is recommended that the scope of the monitoring be extended to include the following key locations and MBTA bus routes: 8

- Peak period manual turning movement, vehicle classification, and pedestrian/bicycle counts at the following intersections:
 - Harvard Street at Mystic Valley Parkway (Route 16) and Mystic Avenue (Route 38)
 - Mystic Valley Parkway (Route 16) and Route 16 Southbound Connector
 - Harvard Street at Main Street

- Annual public transportation counts for buses include the following MBTA bus routes:
 - Route 90 (Davis Square – Wellington Station)
 - Route 100 (Elm Street – Wellington Station) 8 (cont)
 - Route 134 (North Woburn – Wellington Station)
- Monitoring along the following corridors:
 - Harvard Street
 - Mystic Avenue (Route 38)
 - Fellsway (Route 28)
 - Riverside Avenue
 - Rivers Edge Drive

Due to the significant number of trips from the Mystic Valley Parkway Connector and the close proximity to I-93, the intersection of Route 16 at Route 38 should be monitored in order to confirm proper traffic operations and avoid queues that may back onto I-93. The intersection of Route 16 at Route 38 is coordinated with the intersection of Mystic Valley Parkway at Mystic Avenue and Harvard Street; therefore also requiring monitoring.

Within the previously submitted traffic peer review on the DEIR, GPI commented on the anticipated route choices for traffic destined for I-93 North upon exiting the Project site. GPI also provided travel time projections for peak periods as reported by Google maps. Updates to the trip distribution were not included within the FEIR. Given the congestion experienced along I-93 North during the evening commuting period it is reasonable to speculate that vehicles may seek alternate routes to avoid this congestion upon exiting the Project site. As the most likely routes to be utilized to by-pass the congestion surrounding I-93 North include the Fellsway (Route 28), Riverside Avenue and Rivers Edge Drive in Medford, these corridors warrant further consideration. All three of these routes currently serve as by-pass routes to I-93, which avoid a significant portion of the congestion experienced on the “elevated deck” portions of I-93 during peak periods. In addition, concerns remain regarding the potential for cut-thru traffic utilizing Harvard Street and Mystic Avenue (Route 38) to access 93 to the north to avoid congestion on Alford Street (Route 99) and Sullivan Square. Monitoring should be conducted at these locations. Along Harvard Street, the City of Medford would like the intersection at Main Street to be included in the monitoring program in order to validate traffic that may use Harvard Street as a cut-thru.

It was noted that this traffic monitoring program would be conducted by the Proponent. GPI suggests that this role would be better suited for an independent 3rd party that could analyze traffic conditions and impartially determine the relative impact from the proposed Wynn casino. 9

Finally the Proponent states that if the results of the traffic monitoring program indicated that if measured traffic volumes exceed 110% of projected values or project distribution varies by more 10

Mayor McGlynn
August 7, 2014
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than 10% of assumed values the proponent will undertake corrective measures. These measures include what GPI would consider “soft” corrective measures. Given the size and scale of the Project GPI recommends that more noted physical improvement measures should also be required if deemed appropriate. 10 (cont)

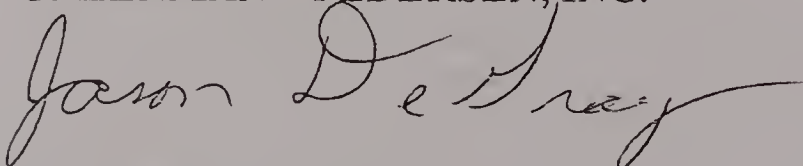
CONCLUSION

While the FEIR provides some additional information and detail addressing concerns raised by GPI in our review of the DEIR, noted concerns still remain. These are most prevalent at the Harvard Street/Mystic Valley Parkway (Route 16)/Mystic Avenue (Route 38)/I-93 Exit 31 Southbound Off-Ramp cluster of intersections where project impacts could have a significant impact on both local and regional mobility. A more robust mitigation plan is warranted. GPI also feels that a long term improvement plan for Wellington Circle has yet to be devised. Given the magnitude of this Project GPI strongly recommends that at a minimum a larger scale, grade-separated improvement plan be developed now so that it may be implemented in a more timely manner should the situation become untenable in the future. Finally the Proponent’s traffic monitoring commitment should also not preclude additional physical geometric corrective measures in the future should they be warranted.

Should you have any questions, or require additional information, please contact me directly at (978) 570-2981.

Sincerely,

GREENMAN – PEDERSEN, INC.



Jason DeGray, P.E., PTOE
Project Manager

enclosure(s).



The Office of
SALVATORE LaMATTINA
Boston City Councilor - District One

RECEIVED

AUG 13 2014

MEPA

AC

Maeve Valley Bartlett, Secretary, EOEAA
Attn: MEPA Office
100 Cambridge St
Boston, MA 02114

James McHugh, Commissioner
Gayle Cameron, Commissioner
Bruce Stebbins, Commissioner
Enrique Zuniga, Commissioner

Massachusetts Gaming Commission
84 State St, 10th Floor
Boston, MA 02109

Re: Wynn Everett FEIR

August 11, 2014

Dear Secretary and Commissioners,

It is my understanding that the design plans and traffic analysis for the Sullivan Square portion of the Wynn Everett 2014 FEIR (Final Environmental Impact Report) have been removed. If so, this is completely unacceptable on many levels. First of all, the DEIR (Draft Environmental Impact Report) included plans to mitigate this traffic circle and now all of a sudden they've been dropped. What's the rationale here? Wynn has stated that the current study being conducted by the City to alleviate the existing traffic problems would be more than sufficient and would resolve the current issues. Except the current study being done by the City isn't taking into account thousands of extra cars that will be traveling through this area on the way to a casino. Secondly, I've attended numerous meetings in Charlestown, which is a neighborhood that I represent as District 1 City Councilor, but I can particularly remember one meeting where Wynn representatives showed up with virtually no plan at all. So they didn't have a plan, then they had a plan, then they removed that plan? Are we supposed to have faith that they will keep their word?

What we have is a traffic nightmare that will be guaranteed to only get worse and we have a company that has not been very forthcoming with us from the beginning of this process. Wynn expects the City to cover the full expense of a project that has many difficult challenges ahead in its existing form, never mind in years to come. They have not provided us with a capacity analysis or any documentation that would account for signal times and safe street crossings for pedestrians, bicyclists or the handicapped. For all its flaws, at least the DEIR had something.

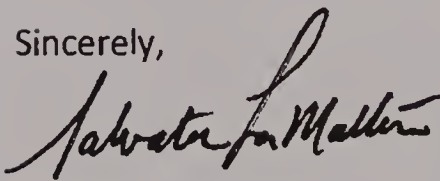
We also need to take into account traffic that will be coming in from Main Street and Rutherford Ave as well as traffic leaving the casino. Can't the argument be made that there is a huge risk being taken by allowing this project to go through with its current traffic proposal because no attention has been paid to the traffic that will be leaving the casino at the same time? When confronted with that question, the Wynn representatives' token answer was always "Well we believe that the commuters will

1

take another route home." Except we all know that once these "alternative routes" have been discovered they will become a bottleneck as well.

I respectfully ask that you take these concerns into consideration, for they should not be weighed lightly. It's no secret that the City has been unsuccessful negotiating any aspect of this proposal with Wynn, not that we haven't given our best effort. The same cannot be said for Wynn, so why should we bear the burden of making up for what they'll obviously be lacking? The previous plans were too insufficient and the fact that they've been completely removed is ludicrous. I hope that the EOEEA and the Gaming Commission agree on the FEIR's inadequacy.

Sincerely,

A handwritten signature in black ink that reads "Salvatore LaMattina". The signature is written in a cursive style with a large, looping initial 'S'.

Salvatore LaMattina

Boston City Councilor, District 1



CITY OF SOMERVILLE, MASSACHUSETTS
JOSEPH A. CURTATONE
MAYOR

August 8, 2014

VIA E-MAIL (anne.canaday@state.ma.us) &
HAND DELIVERY

Secretary Maeve Vallety Bartlett
Executive Office of Energy and Environmental Affairs
Attn: MEPA Office
Analyst Anne Canaday, EEA No. 15060
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: Final Environmental Impact Report for Wynn Everett: EEA# 15060

Dear Secretary Bartlett:

The City of Somerville (City) has reviewed the Final Environmental Impact Report (FEIR) submitted by Wynn MA, LLC for the proposed Wynn Everett casino and resort project and provides the following comments.

Transportation Network

There have been several changes made to the project since the submittal of the DEIR which are of concern to the City of Somerville. Below are the issues of most concern to the City and additional comments on the City's position on the inadequacy of the DEIR and the resulting FEIR.

The FEIR changes the mode assignments made in the DEIR. Most notably, the FEIR assumes that 63% of patrons will park on site, down from 69%. The decrease in onsite parking assumes that 6% of patrons will arrive by water transportation (up from 3%) and that 3% of patrons will arrive by "premium shuttle" a mode not referenced in the DEIR. See FEIR, Chapter 4. The FEIR includes a project change which contains additional onsite parking, increasing the number of onsite parking spaces to 3700.



To build a larger parking facility, while assuming fewer patrons will choose to drive to the facility, raises concerns about the project's impact on the regional transportation network. Parking availability is a driver for mode choice. If it can be reasonably expected that parking will always be available, as it would be when approximately 3,000 parking spaces is cited as the normal operating capacity for parking and 3,700 parking spaces are being built (almost 25% more capacity than needed), than a patron can assume that parking will always be available. Therefore, there is no incentive not to drive to the facility, let alone change FEIR input assumptions to reflect that 6% less patrons will now arrive by car. 1

The FEIR assumptions for patron mode assignment have been contradicted by Mr. Wynn himself. According to an article on wbur.com, Wynn told reporters: "I don't think that our people really travel on the commuter, they come by car."¹

The FEIR references placing one Hubway station on site. Hubway is a transportation system whose operations are administered via individual contracts with an operations vendor and member municipalities. Membership in the system stands at Boston, Cambridge, Somerville and Brookline. As the Memorandum of Agreement (MOA) is written, a non-government agency cannot join the system. Wynn Everett cannot simply purchase a Hubway station for the casino. Instead, the City of Everett would have to petition the other member cities and the Metropolitan Area Planning Council to amend the existing MOA to become a member. Then, Wynn Everett can "sponsor" a station. However, as part of the contract with the operating vendor, stations are ideally 0.25 miles apart and no more than 0.33 miles apart. The closest existing Hubway station to the site is at the corner of Main Street and Austin Avenue in Charlestown; 1.9 miles away. There would be a need for at least seven or eight, stations to adequately serve the area in the vicinity of the proposed gaming establishment.

Continued questions as to how the proponent will ultimately mitigate, and fund, improvements to intersections, such as the Sullivan Square area, which will bear substantial impact on Somerville neighborhoods including East Somerville and Assembly Square remains unsettled despite the filing of the FEIR.

Environmental Remediation

Chapter 10 outlines a proposed plan for remediating the site in accordance with the Massachusetts Contingency Plan (MCP). Somerville supports cleanup of the site, but continues to believe that the proponent fails to fully address the constraints that remediation may place on the objectives of the development plan.

¹ Fred Thys, "Rival Casino Developers Make Their Pitches", Online at: <http://www.wbur.org/2014/01/23/boston-casinos>. WBUR, January 23, 2013.



The FEIR indicates that, while the site will require Activity and Use Limitations on portions of the land, there will be no change in the program or impact on the public. The proponent states:

Following redevelopment, institutional controls in the form of one or more Activity and Use Limitations (AULs) will be put in place to limit exposure to impacted soils remaining at the Project Site after redevelopment; such controls will not, however, restrict use of or planned activities at any of the Project buildings or open space facilities by patrons or members of the public.

We continue to believe that the proponent has not sufficiently considered the effect of AULs on certain activities including passive and active recreation. Somerville continues to believe that changes to the development plan imposed by remediation would reduce the proposed public benefits, which, as currently planned, are far from adequate to offset the major exemptions that the proponent seeks from normal waterfront development requirements. 2

The FEIR indicates that in-situ Stabilization/Solidification (ISS) will be used to treat one of the portions of the property that abuts a portion of the river. While ISS is an accepted method for treating certain hazardous wastes, there have been concerns raised about the method as it relates to corrosion of the treated material and erosion related to water infiltration. In our comment letter on the DEIR, we asked you to require the proponent to fully examine the long-term issues related to ISS and to consider alternatives to ISS for this site. While the FEIR provides some detail on the use of ISS in the southern portion of the site, we feel that it does not adequately consider alternative remediation methods nor sufficiently outline criteria for its expectation to “expand on the extent of soil stabilization/removal areas.” The proponent has not provided sufficiently detailed information relative to hazardous waste to demonstrate that any removal or remediation can be done in a manner that will not harm the waterway or surrounding communities over the long term. 3

The proponent has indicated that they believe the site can achieve a long term permanent solution. We believe that the FEIR has not provided sufficient information to demonstrate the feasibility that this can be done in a safe and environmentally responsible manner that maintains public benefits. 4

The City is also concerned with the recent report that the “Phase IV” report, which would contain a full cleanup plan in detail, will not be made available until next year as this would provide additional information about how the cleanup would proceed. The existing phase reports have not been prepared by the consultants for the project proponent, and future plans in the event of a gaming license issued to Wynn Everett would be submitted, and may be modified, by the proponent. In a MEPA process meant to provide for the disclosure of information to the public about a project of regional significance, we remain concerned that this type of information may not be made available for some time to come. 5



Conclusion

While we are aware that the applicant has provided comments in response to our DEIR submittal and while the FEIR proposes some changes to the project and provides further clarity on certain topics, we believe that the proponent again fails to adequately address many of the issues that were raised by the comments, including traffic, waterfront development, hazardous waste remediation, air quality and the visual impact of the development. None of the proposed changes, mitigation and detail provided by the applicant sufficiently addresses the significant negative impacts on Somerville and other surrounding communities including but not limited to traffic, air quality, economic impacts, construction impacts and visual blight.

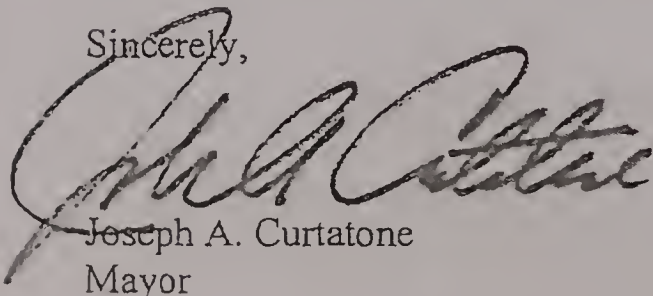
Finally, we reiterate that the shortcomings in the Final EIR are of particular concern because of the central role that the MEPA process will play in the Massachusetts Gaming Commission's decision whether to issue a license for the Wynn Everett casino. The Gaming Commission's own statute makes it clear that a thorough understanding and evaluation of potential environmental impacts of the project must be a part of the decision whether to grant a license to the project, *see* M.G.L. Chapter 23K, Section 18(2), (8) and (9), or indeed to any casino in the region, *see* Chapter 23K, Section 19(a). And that is the case under MEPA as well.

Environmental review for this project is not, as is "ordinarily" the case, "limited to the subject matter of required or potentially required permits;" rather, "the subject matter of the Gaming License confers broad scope jurisdiction and extends to all aspects of the project that may cause Damage to the Environment."

For these reasons, shortcomings in the project's environmental analysis not only compromise the informing-the-public aspect of the process – itself one of MEPA's central functions; they also undermine the validity of the licensing decision itself, which by statute must take into account the environmental benefits and detriments of the project.

Thank you for the opportunity to provide comment on this proposed project. Please contact my office with any questions.

Sincerely,



Joseph A. Curtatone
Mayor

cc: Michael Glavin, Director, OSPCD
City of Somerville Board of Aldermen





CITY OF BOSTON • MASSACHUSETTS

Office of Gaming Accountability
City Hall, Room 620 Boston, MA 02201

August 8, 2014

Via U.S. Mail & Electronic Delivery

Secretary Maeve Valley Bartlett
Executive Office of Energy and Environmental Affairs
Attn: MEPA Office
100 Cambridge St., Suite 900
Boston MA, 02114

RE: *EOEEA # 15060 – Wynn MA, LLC*

Dear Secretary Bartlett:

The City of Boston is pleased to have the opportunity to comment on the Final Environmental Impact Report (FEIR) for Wynn MA, LLC regarding the above referenced project. The City of Boston is committed to enhancing and protecting the quality of life of all Boston residents, workers, businesses, visitors and tourists, and with respect to the impacts of this project, the City of Boston is particularly concerned for those who live and work in Charlestown.

Attached please find the City of Boston's Comment Letters to the FEIR.

- Attachment A: Boston Transportation Department Comment Letter, including a technical memorandum by our engineers and consultants
- Attachment B: City of Boston Environment, Energy & Open Space Comment Letter
- Attachment C: Boston Parks and Recreation Commission

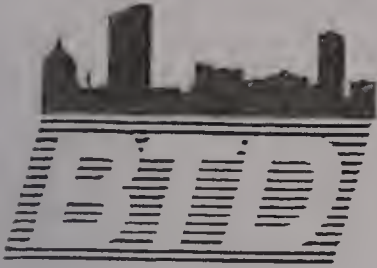
Thank you for your consideration of the City of Boston's comments. Please do not hesitate to contact me with any questions you may have.

Sincerely,

Anthony J. Gallagher
Office of Gaming Accountability

ATTACHMENT

A



BOSTON
TRANSPORTATION
DEPARTMENT

August 8, 2014

ONE CITY HALL SQUARE • ROOM 721
BOSTON, MASSACHUSETTS 02201
617-635-4680 • FAX 617-635-4295

Via U.S. and Electronic Mail

Secretary Maeve Vallely Bartlett
Executive Office of Energy and Environmental Affairs
Attn: MEPA Office
100 Cambridge Street, Suite 900
Boston, MA 02214

Reference: EOEEA# 15060
Wynn Everett Resort Transportation

Dear Secretary Bartlett:

The City of Boston Transportation Department (BTD) is pleased to have the opportunity to comment on the Final Environmental Impact Report (FEIR) submitted by Wynn, MA, LLC ("Wynn") for the above referenced project. The City of Boston is committed to enhancing and protecting the quality of life of all Boston residents and, with respect to the impacts of this project, is particularly concerned for those who live and work in Charlestown. The project will have significant impacts on roadways as well as pedestrian, transit and bicycle facilities located in Boston as described in the FEIR.

Unfortunately we find that the FEIR does little to address the concerns we raised in comments on the Draft Environmental Impact Report (DEIR) filed for this project. Accordingly, we respectfully ask that the filing of a Supplemental FEIR for this project be required. Our concerns relate primarily to the incompatibility of the proposed resort development with the City's plans for Sullivan Square and Rutherford Avenue and the FEIR's failure to address this issue. The City of Boston has just completed a three-year long planning process defining improvements for Sullivan Square and Rutherford Avenue that are intended to enhance the urban environment with greater pedestrian connectivity and new land development opportunities. The anticipated \$100 million roadway improvement project will remove existing roadway grade separations that form a barrier for pedestrian and bicycle travel east-west across Sullivan Square and Rutherford Avenue. The applicant's proposal to draw another 12,000 vehicles per day through Sullivan Square is in direct conflict with the City's plan to deemphasize vehicular travel and promote alternative travel modes in this area. The applicant has failed to put forward any plan indicating how this conflict will be resolved. In fact, the FEIR fails to even analyze the projected future roadway conditions proposed by the City. Whereas the DEIR demonstrated that the added resort traffic would cause significant peak

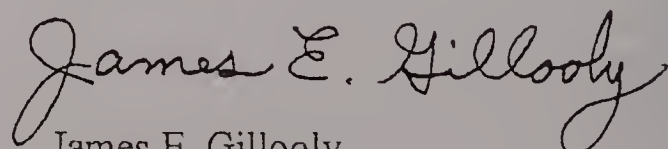
hour congestion in Sullivan Square and along Rutherford Avenue under proposed roadway conditions the FEIR only offers mitigation for the existing roadway system.

With regard to traffic mitigation "plans" that have been submitted for the existing roadway system we find these to be inadequate. In our comments on the DEIR we asked that plans be developed and submitted at a scale that would allow evaluation of the feasibility of the proposed improvements. The mitigation plans provided for Cambridge Street entering Sullivan Square were drawn on an aerial photograph with no information provided regarding proposed street dimensions and the availability of right-of-way to accommodate proposed roadway widenings. The operational analysis provided for the mitigation plan is limited to the Cambridge Street/Maffa Way intersection with no analysis provided for the equally challenging Rutherford Avenue/Alford Street intersection. Also disturbing is the fact that the mitigation plans for Boston streets were developed without consulting the BTB. The BTB's first exposure to these plans occurred when the FEIR was filed.

Also, the City remains very concerned that the proposed roadway improvements at the main site driveway cannot be built as proposed and that even if they can be built that they will not provide adequate capacity to serve project related travel demands with causing significant peak hour traffic congestion on Alford Street in the City of Boston. The access plan proposes the addition of two left-turn lanes on Alford Street in Boston requiring land takings from at least two parcels located within the City of Boston. The applicant's own analysis shows that adequate vehicle storage capacity is not available on the Alford Street intersection approach to allow the two turn lanes to operate efficiently. Final design of these improvements are likely to show that required land takings in the City of Boston are more extensive than those shown on the applicant's plan. Not only must these takings be approved by the City of Boston but the takings may include land that is currently owned by the City.

The issues raised above are discussed in greater detail in the attached technical memorandum prepared by our technical staff and consultant team. Additional issues are also raised in the memorandum. Once again we thank you for providing us with the opportunity to comment on the Wynn Everett FEIR. We look forward to reviewing a Supplemental FEIR that will hopefully begin to address our concerns regarding this project.

Regards,



James E. Gillooly,
Interim Commissioner
Boston Transportation Department



Stantec Consulting Services Inc.
55 Green Mountain Drive
South Burlington VT 05403
Tel: (802) 864-0223
Fax: (802) 864-0165

August 8, 2014
File: 195310830

Attention: Mr. James Gillooly
Boston Transportation Department
City of Boston
City Hall, Room 721
Boston, MA 02201

Dear Interim Commissioner Gillooly,

Reference: EOEEA# 15060
Wynn Everett Resort FEIR
Transportation

Per your request we have reviewed the transportation element of the Final Environmental Impact Report (FEIR) for the proposed Wynn Everett resort dated June 30, 2014. Our detailed comments are provided below referencing specific sections in the FEIR.

Section 4.1-This section describes the overall traffic mitigation plan. The improvement plan identifies significant improvements along roadways north of the project site with relatively nominal improvements proposed in Sullivan Square to the south. However, the FEIR predicts that 68 percent of the resort patron traffic will be destined to the south. In general it would appear that the mitigation plan should commit greater resources to addressing traffic impacts to the south of the site.

Section 4.1.1-This section mentions two shuttle routes proposed between the site and Orange Line stations north of the site at Wellington Circle and Malden Center. Given that resort patrons using transit riders will generally originate on the transit system south of the site it would make more sense to offer shuttle services at Sullivan Square Station. If this is not feasible the reasons why should be explained. 1

Service vehicle access for the resort is proposed by way of a new service road to be constructed connecting the project site to Broadway in Everett at Beacham Street. However, the applicant does not control the property that the road would be built on. Drawings provided elsewhere in the document suggest that the road would be constructed through an existing McDonald's restaurant. The project should only be evaluated only based what can be built on land that the applicant controls. Consequently, a proper traffic analysis would assign all service vehicles to the proposed main site driveway and not 2



Reference: Wynn Everett FEIR

assume completion of the service road. Likewise, the main site driveway should be assumed to be located at Horizon Way as the applicant does not control land that it proposes to purchase from the MBTA that would allow construction of the main driveway at the preferred location. The FEIR provides no analysis of the “alternative” main site driveway intersection with Broadway and Alford Street in Boston.

2 (cont)

Section 4.1.2-The section mentions that new goals have been established for the project’s Travel Demand Management (TDM) program. While it is appropriate for the project to set lofty goals for the use of alternative modes, the TDM program described later in the report does not include any consequences for the applicant associated with not meeting these goals. Clearly, if the goals are not met other area roadway users and Boston residents will experience greater traffic congestion and longer traffic delays than described in the FEIR. Penalties should be in place to incentivize the applicant to meet the goals and/or to fund efforts by others to address the shortfalls of the applicant’s plan. Given the uniqueness of this use, the level of uncertainty regarding the traffic forecasts, and the level of existing traffic congestion in the site vicinity, a penalty component should be a part of the TDM plan.

3

The FEIR increases the estimated resort travel share by way of the proposed water shuttle to six percent relative to the proposed three percent offered in the DEIR. The BTDC expressed concern that there was no evidence to support the assumed three percent share and no empirical data is provided in the FEIR. Clearly, the change in assumptions to six percent is a step in the wrong direction in terms of providing a conservative analysis condition. The BTDC supports efforts to provide water transportation as an alternative travel mode in the City and encourages the applicant to move forward with this element of the program however, in order to provide a realistic vehicular traffic analysis the change to six percent mode share is inappropriate. It is quite possible that proposed water shuttle service may be viewed as a novelty that would increase total visitation to the resort relative to the applicant’s forecasts in the FEIR rather than cause a shift in travel modes away from automobiles. Likewise, it may simply “steal” share from the ten percent transit mode assumed by the applicant which if this is the case would have not beneficial impact on vehicular travel demand.

4

The ten percent mode share for transit use was also questioned at the DEIR stage. Independent of the applicant’s repeated statements in the FEIR that the site is ideally situated from a transit perspective, the reality is that it is not within a comfortable walking distance of a fixed rail transit line. The other casino resort proposal that is under review in the Boston market is located at Suffolk Downs immediately adjacent to an MBTA Blue Line station. For this project a ten percent transit mode share is assumed. It is

5



Reference: Wynn Everett FEIR

unlikely that the Everett site would be able to attract the same level of transit ridership given the need to transfer to/from shuttle buses connecting to the Orange Line. In the case of the Sugarhouse casino in Philadelphia, a comparable resort in many respects, light rail transit service is offered to the front door of the casino. In spite of this, the transit share for patron access at this resort is less than ten percent. 5 (cont)

Section 4.1.3-The FEIR notes that Level of Service E and F operating conditions along Lower Broadway in Everett forecasted in the DEIR are no longer anticipated. No explanation is given as to how this alternative conclusion was reached. If additional mitigation was offered then an explanation should be provided as to how the mitigation improved traffic flow. If the change is the result of new assumptions regarding resort travel mode choice this should be explained as well. As noted above, assumptions made regarding the use of alternative travel modes have not been adequately documented. All estimates provided are speculative and not based on measured experience at comparable facilities. 6

Section 4.1.9-New mitigation is proposed for Sullivan Square. The proposed measures are limited to west side of the square and are proposed relative to existing conditions. The improvements have not been reviewed with the BTD and the graphics provided do not include sufficient information to determine if the proposed improvements can be constructed within the existing right-of-way. Regardless, these improvements, if feasible, should be considered interim improvements as the City has a plan to upgrade Sullivan Square which the applicant has not adequately addressed in the FEIR. The applicant has yet to show how the proposed development project is compatible with the transportation system changes proposed by the City in Sullivan Square. 7

The applicant indicates that no mitigation is required at along Rutherford Avenue yet the existing conditions analysis shows certain movements at intersections along Rutherford Avenue operating at LOS E or F and it is assumed that 15 percent of the project traffic will use this corridor. Again, the applicant does not propose mitigation relative to the City plan for Rutherford Avenue. The DEIR analysis indicated that the anticipated traffic increases on Rutherford Avenue associated with the proposed development project are not compatible with the City's plan for the corridor. 8

Section 4.2.1-This section lists changes in the project since preparation of the DEIR. Earlier sections noted how the proposed number of gaming positions at the resort has increased which would indicate an increase in site traffic generation as gaming positions was the independent variable used to estimate site traffic volumes. The City commented on the DERI indicating that the applicant's vehicle trip estimates could be low and asked 9



Reference: Wynn Everett FEIR

for a more conservative analysis approach. The response from the applicant has been a 9 (cont)
reduction in the vehicle trip estimate in spite of an increase in the number of gaming
positions and number of parking spaces on the site. The applicant is taking credit for an
expanded travel demand management (TDM) program and increased confidence in the
effectiveness of the program.

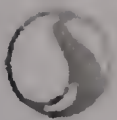
A new element of the TDM program is a premium shuttle bus service from Logan Express 10
lots in the region. The applicant assumes that the service will attract nearly the same
mode share to the casino that Logan Express attracts to the airport. However, the travel
behaviors of the two user groups compared are dissimilar as such the mode share
assumption for casino patrons seems optimistic. Logan Express travelers are not only
avoiding congestion on the roadway but they are also avoiding very high parking fees at
the airport for a trip that may last several days. Casino resort patrons on the other hand
may only be parking at the resort for a few hours where parking fees may be non-existent
or nominal. Consequently, the financial incentives are much different due to the different
trip durations.

Independent of the effectiveness of the premium park and ride service the City questions 11
whether or not this is an appropriate use of Logan Express parking spaces. To the extent
that there are existing unused spaces available at these lots to serve casino resort patrons
then leasing these spaces to a private entity to raise Massport revenues makes sense.
However, the leases should be short-term in order to be able to effectively accommodate
airport patron demand should that demand increase.

Section 4.3.2.2-The applicant indicates that the proposed Malden Park was considered as 12
one of the background development projects from a traffic perspective. However, it
appears that the project was ignored from a parking perspective as Malden Park proposes
to use the same two garages in Malden Center for patron parking on summer evenings
that the Wynn project intends to allocate to employees. These garages already experience
significant daytime use serving local businesses and commuters into Boston. The viability
of the Wynn employee parking plan is questionable if the Malden Park project moves
forward.

Section 4.4.1.1-The applicant continues to propose site access by way of the "preferred"
that moves the existing site driveway north from Horizon Way on the Everett/Boston
boundary to a new location on MBTA owned land. There is no explanation as to why this
plan is preferred. Presumably it offers significant benefits or else the applicant would not
choose to incur the expense of acquiring the land necessary to move the driveway from
the MBTA.

No Response Needed



Reference: Wynn Everett FEIR

The driveway shown on the preferred plan is intersected by various service drives for the proposed resort. There have been no analyses provided to show how traffic using these drives interacts with through traffic on the main drive and how these interactions may affect operations of the Proposed Main Site Driveway/Route 99 intersection. 13

One of these service drives is described in Figure 4-9 as accommodating access to secured bicycle parking. The figure shows cyclists leaving the garage having to cross the four-lane, median-divided main access drive to return to Route 99. Cyclists heading west must mix with vehicular traffic, no bike lanes are shown on the drawing, cross an active tour bus drop-off/pick-up zone, and then apparently dismount to cross the driveway at the busy porte-cochere area. A more thoughtful, safer accommodation of cyclists seems appropriate. 14

The proposed service drive in this section is described as accommodating service vehicles, shuttle buses and taxi cabs. This further emphasizes the project's dependence on a roadway to be built on land that the applicant does not control. 15

The preferred access plan continues to show an abrupt change in roadway alignment southbound on Alford Street at Dexter Street. This abrupt shift constitutes a safety hazard. The applicant has not explained how this can be mitigated. Acquisition of land from the Boston Water and Sewer Commission (BWSC) on the west side of Alford Street may be a solution but the BTDC is unaware of any discussion between the applicant and the BWSC in this regard. 16

Section 4.4.3-This section describes the proposed water shuttle plan which the BTDC supports. However, the BTDC is concerned that private vessels may seek to access the site from Boston Harbor. These boat movements may require opening and closing of the Alford Street drawbridge over the Mystic River impeding vehicular traffic on Alford Street. No analysis of these potential impacts has been provided and the applicant's policy with regard to private vessel access needs to be explained. 17

Section 4.4.4.1-Pedestrian access to the project site should be encouraged and the applicant has proposed plans to do so. Implied by the intersection capacity analysis results for the Site Driveway/Route 99 intersection, these plans include the provision of an exclusive pedestrian signal phase at this intersection. However, the analysis results do not reflect any actuation of this phase. As such, the capacity of the site driveway intersection is significantly overstated. As such, the level of service, volume-to-capacity ratio and vehicle queue length findings are all invalid. Given the implication that the 18



Reference: Wynn Everett FEIR

results have for traffic flow on Route 99 in Broadway and Everett proposed capacity analysis results should be provided.

Section 4.4.5-The applicant is proposing a fee collection system to help manage the parking demand at the site. This strategy will need to be monitored closely as it could drive parking demand off-site into residential parking areas or the lots of area businesses. However, at this point in the process details of the fee collection system should be described and analyzed to ensure that vehicle queues forming at the garage entrance do not spill back to impede traffic flow on the site driveway and Route 99. 19

Section 4.5.1.4-Shuttle bus services to two Orange Line stations are proposed. Plans and analyses should be provided to demonstrate that there is adequate space at the two Orange Line stations to accommodate the buses. 20

Section 4.5.1.8-An estimated 40 to 50 tour buses per day will visit the project site. Plans and analyses should be provided to demonstrate that there is adequate space at the proposed tour bus drop-off/pick-up area to serve this demand without causing congestion on the main site driveway. 21

Section 4.7.4-This section begins presenting intersection operations results for existing and future conditions. The BTDC commented on the DEIR noting that the applicant failed to present overall intersection volume-to-capacity ratios in the tables provided in the main report. (This information could only be found by looking at worksheets in the report appendix.) Volume-to-capacity ratios provide a very valuable measure of intersection performance. This information is again missing from the main FEIR report. 22

As noted above, it does not appear that the "all walk" pedestrian signal phase was not considered in the level of service analysis for the site driveway intersection with Route 99. This leads to an overly optimistic forecast of future intersection operations. However, even with this optimistic assumption, certain movements at the intersection will operate with vehicle queues that significantly exceed the available storage capacity as noted in Table 4-10 under Friday, Build with Mitigation conditions. These concerns were raised during the DEIR review and have still not been addressed. Similarly, the Beacham Street/Route 99 intersection is predicted to operate at an overall Level of Service D for the same conditions. This result is misleading as the westbound approach to this intersection is shown to be operating at 132 percent of capacity. Vehicle queues on this approach will be unmanageable. 23 24

ATTACHMENT

B



CITY OF BOSTON • MASSACHUSETTS

LAW DEPARTMENT

City Hall, Room 615 Boston, MA 02201

Via U.S. and Electronic Mail

August 5th, 2014

Secretary Richard K. Sullivan

Executive Office of Energy and Environmental Affairs

Attn: Anne Canaday, MEPA Office

100 Cambridge Street, Suite 900

Boston, MA 02214

Reference: EOEEA# 15060

Wynn Everett Final Environmental Impact Report Extension Request

Dear Secretary Sullivan:

The City of Boston is requesting an extension of the comment period for the Final Environmental Impact Report (FEIR) submitted by Wynn MA, LLC for the above-referenced project. A thirty (30) day extension would allow the City to fully evaluate the thousands of pages of new material and submit comprehensive comments.

This component of the MEPA process may provide the last opportunity for the City of Boston and the public to react not only to new material in the FEIR but to Wynn MA LLC's response to comments offered on the Draft Environmental Impact Report (DEIR).

The City understands that comparable filings for casino applicants in Eastern Massachusetts have had an extended comment period of sixty (60) days. We believe that an extension would cause no harm to the Applicant while offering members of a surrounding community a full chance to consider the sizeable volume of information about a project that would create myriad environmental impacts

Regional Impacts

EEOS – 1

A transportation analysis does not address the full effects of induced growth on the region, including adverse regional impacts. The response does not address the comment completely.

EEOS – 2

That Wynn expects the project to generate net new income for the region; it does not address the question. Will this Project force out other jobs and businesses in the region?

Air Quality and Construction

EEOS – 3

The FEIR does not include a construction management plan (CMP) that would help to address the issues raised in our DEIR comments. Given the very extensive site contamination and the plan to engage in concurrent remediation and construction, it is essential that details be provided about the ways in which adverse impacts in Boston will be avoided. The response is not satisfactory.

EEOS – 4

See comment on response to EEOS – 3.

EEOS – 5

See comment on response to EEOS – 3.

EEOS – 6, EEOS – 7, EEOS – 73, EEOS - 74, EEOS – 75, EEOS - 76

The information in Chapter 12 is not detailed and does not address our comment, which requested commitments to important and necessary measures. Surrounding communities should have the opportunity to evaluate and comment on mitigation measures proposed for remediation and construction including, but not limited to, phasing, overlapping activities, durations, vibration, noise and air quality.

EEOS - 8

Chapter 12 is not responsive to the comment.

EEOS - 9

The issue of General Conformity has apparently not been raised with the U.S. Army Corps of Engineers (ACOE). Surrounding communities should have been informed in the FEIR regarding discussions with the ACOE.

EEOS - 11

We continue to believe that a microscale analysis is in the best interest of residents in the project area.

EEOS - 12

See comment on response to EEOS – 11.

EEOS – 16

The response does not address the specifics of the comment.

Greenhouse Gas Emissions and Energy

EEOS - 17

The Proponent had committed to an analysis to identify the avoided greenhouse gas (GHG) emissions associated with the proposed water shuttle. The analysis remains important despite the small expected increase in the water shuttle mode.

EEOS - 18

IECC 2012 is now in effect and while not required due to timing, it provides for a higher level of energy efficiency and safety.

EEOS - 19

A GHG analysis for construction equipment would provide valuable information about how to minimize the impact of construction on air quality.

Climate Preparedness and Sea Level Rise

EEOS – 20

While there is a rationale expressed for seeking an exemption from 310 CMR 9.32(a)(a), there is no indication that a regulatory determination has been made. This information should have been provided in the FEIR.

EEOS – 23 through EEOS 26

Section 6.2.1 and 3.1.4 do not fully respond to our comments

EEOS – 27

While the rate of sea level rise over time is subject to some debate, local and regional projections are considered reliable and should not be dismissed.

Contaminated Materials and Hazardous Waste Remediation

EEOS – 32

A summary of findings in plain language should have been included in the FEIR as the referenced document is technical and, therefore, not user-friendly for all readers.

Transportation Demand Management

EEOS – 52

We believe that ongoing, permanent TDM monitoring is the only way to ensure that a TDM program is capturing the maximum number of users.

Shellfish Bed Restoration

EEOS – 55

The Proponent has not provided verification from MassDEP that a 91-year lapse between dredging activities allows for the activity to be identified as “maintenance” dredging.

EEOS – 63

The monitoring period and monitoring protocols should have been provided in the FEIR, providing agencies and individuals the ability to evaluate and comment.

EEOS – 64

It is made clear that establishing shellfish beds is voluntary, not required mitigation. That said, planning corrective action, i.e. an adaptive management plan, is good practice in any case.

ATTACHMENT

C

BOSTON

August 8, 2014
Martin J. Walsh, Mayor

Secretary Maeve Vallely Bartlett
Executive Office of Energy and Environmental Affairs
100 Cambridge St., Suite 900
Boston MA, 02114

RE: EOEEA #15060, FEIR for Wynn MA, LLC; Horizon Way and Lower Broadway, Everett, MA

Dear Ms. Bartlett;

This letter is in response to the request for comments on the FEIR for the development proposed by Wynn MA, LLC in Everett. The City of Boston Parks and Recreation Department is interested in the potential impacts of the project on Ryan Playground, as well as on the parks that will be provided through the Sullivan Square realignment and redevelopment project in Charlestown.

Summary of Issues

The following issues were presented in the comment letter on the DEIR from this Department dated February 11, 2014. While brief responses were provided in the FEIR, it is the opinion of this Department that the resolution of these matters requires further analysis and mitigation.

- Inclusion of the build out of the Article 80 parcels freed by the realignment of Sullivan Square;
- Congestion in the vicinity of the parks, and a "hotspot" analysis of compromised intersections;
- Increased vehicular, MBTA and tour bus traffic volume on pedestrian access to the parks;
- Increased vehicular, MBTA and tour bus traffic on the air quality around the parks.
- Connection to current planning processes underway for Ryan Playground and Sullivan Square;
- In addition to the issues above, this Department recommends that any open space provided on the Wynn site should be permanently protected in perpetuity through the Chapter 91 License.

Inclusion of the Build out of Sullivan Square

This Department remains concerned that the Wynn proposal has not adequately considered the proposed build out of the significant development parcels to be freed by the realignment of Sullivan Square in Charlestown, with particular regard to traffic congestion, increased traffic volume, and decreased accessibility around Ryan Playground and the parks to be developed at Sullivan Square.

The DEIR indicated that most of the intersections around Sullivan Square had a decreased level of service (LOS) with the Wynn development. However, the DEIR included the proposed roadway improvements at Sullivan Square to the benefit of its analysis, but omitted the proposed build out of the parcels that will be freed for Article 80 redevelopment by the realignment of Sullivan Square.

The seven parcels that will be freed for redevelopment by the realignment of Sullivan Square were conceptualized through a recent BRA planning effort. The proposed building footprints, number of floors and uses were vetted through a public process to create estimates that are included in the *Sullivan Square Disposition Study (12/2013)*. This buildout should be considered as part of the Wynn analysis.



Boston Parks and Recreation Department

1010 Massachusetts Ave., Boston, MA 02118 / Tel.: 617-635-4505 / Fax: 617-635-3173

Coordination with Planning and Improvements in Boston

This Department recommends that the proposed Wynn development should integrate Ryan Playground into its planning and development processes. Ryan Playground is an active recreation area and efforts should be made to ensure that the Wynn development does not detract, and rather enhances the pedestrian, bicycle and vehicular access to that park. Also, there should be no negative impacts to the parking available at Ryan Playground.

Ryan Playground is an active recreational area that generates a vehicular, bicycle and pedestrian traffic. The vehicular traffic generated by Ryan Playground should be included in the Wynn analysis, and the impacts of the Wynn development on the congestion and access to the park should be mitigated.

Further, the proposed Wynn development should be assessed for potential connections to the pedestrian environment, parks and greenway that will be developed in the vicinity of Sullivan Square through the disposition of land from the traffic realignment. These parks and pedestrian ways will be developed by the Article 80 process, as part of the BRA's redevelopment of the intersections around Sullivan Square.

Congestion, Air Quality and Other Impacts on Boston Parks

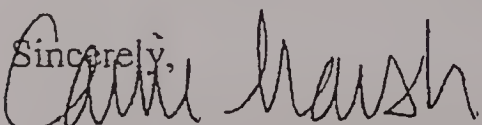
With regard to the air quality around the parks, this Department is concerned about the air quality issues that may be generated by increased traffic congestion around the parks, and also the potential air quality impacts generated by the remediation of the toxic site.

Permanent Protection of On-site Open Space

In addition, this department is concerned about the permanent protection of open space proposed in the FEIR, and requests that the Chapter 91 license process ensure that all open space that is provided within the tidelands be permanently protected in perpetuity through language in the Chapter 91 License Master Deed, conservation restrictions, conveyance to a non-profit or government entity, or other mechanisms.

Community Benefits

This Department would like to recommend that any community benefits that are negotiated for the development should consider the mitigation of impacts to Ryan Playground, and the proposed improvements to Sullivan Square as appropriate.

Sincerely,


Carrie Marsh, Executive Secretary
Boston Parks and Recreation Commission

- cc: Brian Swett, Chief, Environment, Energy and Open Space, City of Boston,
Christopher Cook, Interim Commissioner, Boston Parks and Recreation Department
Liza Meyer, Chief Landscape Architect, Boston Parks and Recreation Department
Anthony Gallagher, Associate, Office of Gaming Accountability, City of Boston



CITY OF BOSTON • MASSACHUSETTS

LAW DEPARTMENT

City Hall, Room 615 Boston, MA 02201

Via U.S. and Electronic Mail

August 5th, 2014

Secretary Richard K. Sullivan

Executive Office of Energy and Environmental Affairs

Attn: Anne Canaday, MEPA Office

100 Cambridge Street, Suite 900

Boston, MA 02214

Reference: EOEEA# 15060

Wynn Everett Final Environmental Impact Report Extension Request

Dear Secretary Sullivan:

The City of Boston is requesting an extension of the comment period for the Final Environmental Impact Report (FEIR) submitted by Wynn MA, LLC for the above-referenced project. A thirty (30) day extension would allow the City to fully evaluate the thousands of pages of new material and submit comprehensive comments.

This component of the MEPA process may provide the last opportunity for the City of Boston and the public to react not only to new material in the FEIR but to Wynn MA LLC's response to comments offered on the Draft Environmental Impact Report (DEIR).

The City understands that comparable filings for casino applicants in Eastern Massachusetts have had an extended comment period of sixty (60) days. We believe that an extension would cause no harm to the Applicant while offering members of a surrounding community a full chance to consider the sizeable volume of information about a project that would create myriad environmental impacts



CITY OF BOSTON • MASSACHUSETTS

LAW DEPARTMENT

City Hall, Room 615 Boston, MA 02201

Thank you for your consideration. Please do not hesitate to contact me with any questions you may have.

Very truly yours,

A handwritten signature in cursive script, reading "Eugene L. O'Flaherty".

Eugene L. O'Flaherty

Corporation Counsel

City of Boston



City of Medford

OFFICE OF THE MAYOR

City Hall - Rooms 202 - 204
Medford, Massachusetts 02155
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AL

FAX: (781) 393-2514
TDD: (781) 393-2516

MICHAEL J. MCGLYNN
MAYOR

August 7, 2014

Secretary Maeve Valley Bartlett
Executive Office of Energy and Environmental Affairs
Attn: MEPA Office/MEPA Reviewer
100 Cambridge Street, Suite 900
Boston, MA 02114

RECEIVED

AUG 08 2014

RE: Final Environmental Impact Report, Wynn Everett

Dear Secretary Bartlett:

Please accept these comments on behalf of the City of Medford regarding the Final Environmental Impact Report (FEIR) submitted for the proposed Wynn Everett casino project. I appreciate the opportunity to share with you the critical mitigation needs that must be addressed by Wynn MA ("the Proponent") so Medford residents can enjoy their vibrant community for years to come.

As a surrounding community for the Wynn Everett project, the City of Medford is looking to make the project work as the Proponent promises, "...a vital public gathering space and economic engine for the region."¹ To do so, my office has analyzed the FEIR from a "Medford-first" perspective. I have found that more serious mitigation commitments must be made by Wynn MA to ensure that mobility and economic growth in the city are not hampered by the casino project. This conclusion is bolstered by findings in the letter written by the City's traffic consultant, Greenman-Pedersen, Inc., which is attached to remarks by the City's Office of Community Development. In their opinion and mine, the most pragmatic mitigation strategy begins with a grade-separated solution to the roadway at Wellington Circle.

GPI reports numerous traffic issues to be further addressed by the Proponent in coordination with local and state agencies, but I wish here to address three of my primary concerns:

1. *Inadequate mitigation at I-93 SB Exit 31 Off-Ramp to Mystic Valley Parkway* 2

¹ Wynn Everett Final Environmental Impact Report. Page 1-2

2. *Unclear Impact of Off-Site Employee parking at Station Landing Garage*
3. *Inadequate mitigation commitment at Wellington Circle*

These items are further discussed below. Please refer to the letter submitted by GPI engineering team for technical details and all other concerns raised by traffic engineers. 3

1. *Mitigation at I-93 SB Exit 31 Off-Ramp*— Project-related traffic will exacerbate congestion for drivers in Medford as well as the tens of thousands of I-93 drivers whose morning commutes are already encumbered by the overflowing queues at Exit 31 every day, especially at the vital left-turn towards Wellington Circle and ultimately the Project Site. Regional mobility and growth, therefore, relies on the Proponent's willingness to deliberately address what has been identified as a major problem in the FEIR but disappointingly has been left without a viable solution under the currently proposed mitigation plan. Even with proposed signal optimization, the intersection is projected to provide an inadequate service level. The City requests a more robust physical mitigation strategy at this intersection. 4

2. *Traffic Impact of Employee Off-Site Parking at Station Landing Garage*—The FEIR does not adequately estimate the traffic impact entailed in Medford's service as a transportation hub—the FEIR projects the use of up to 800 parking spots at the Station Landing Garage, in the heart of Wellington Circle. However, the FEIR seemingly does not account for traffic impacts of those additional vehicle trips as well as the shuttle bus trips. While Medford understands the goals of Wynn's Transportation Demand Management program, any additional vehicle trips at Wellington Circle must be met with additional mitigation commitments. 5
Unaccounted-for employee vehicle trips would cause unbearable stress on Wellington Circle's already fragile, and under a Build scenario, quickly degrading, transportation capacity. The City requests the Proponent clarifies, revises, and further analyses their traffic estimations to better reflect reality.

3. *Inadequate Mitigation Commitments at Wellington Circle*—Even under the revised mitigation strategy involving lane additions and signal optimization at Wellington Circle, numerous intersections are projected to operate worse under Mitigated Build conditions than under No-Build conditions, and many more worse than current. Furthermore, as GPI notes, the projected capacity benefits of proposed lane additions "...may be overstated as reported in the FEIR. These additional lanes will be added to an exceptionally wide roadway cross-section."² Even under the Proponent's optimistic projections, the proposed mitigation strategy at

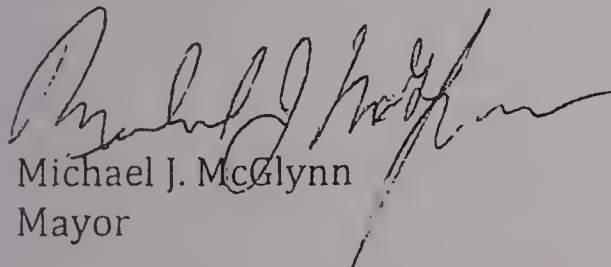
² GPI Letter to Mayor Michael J. McGlynn, August 6, 2014. Page 4.

Wellington Circle is inadequate. The City requests further commitment to a grade-separated roadway solution. 6

Wellington Circle and nearby roads also represent a primary concern to citizens in surrounding communities. A Wellington Circle that operates over capacity with failing service levels, long queue lengths and delay times is a threat to local and regional development that cities, towns, and the state have worked hard to promote. Therefore, I recommend you urge the Proponent to strengthen their commitments beyond current proposals. Furthermore, the Proponent should be compelled to further action on all concerns and recommendations contained in the GPI letter.

Thank you again for the opportunity to comment on this important matter. Should you have any questions or require further information, please do not hesitate to contact my office at (781) 393-2408.

Sincerely,



Michael J. McGlynn
Mayor



LAUREN DiLORENZO
Director

City of Medford

OFFICE OF COMMUNITY DEVELOPMENT

City Hall - Room 308
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August 6, 2014

Secretary Maeve Valley Bartlett
Executive Office of Energy and Environmental Affairs
Attn: MEPA Office/MEPA Reviewer
100 Cambridge Street, Suite 900
Boston, MA 02114

RECEIVED

AUG 08 2014

MEPA

RE: FEIR Wynn Everett

Dear Secretary Bartlett:

Please consider these comments submitted on behalf of the City of Medford as you review the FEIR for the proposed Wynn Everett project. The FEIR continues to raise impacts that require mitigation to ensure the quality of life for our residents is not adversely effected, economic development is not restricted and travel remains safe.

The FEIR has adjusted for the earlier failure to properly account for traffic during the build condition at the intersection of Route 93 and Mystic Valley Parkway. Current and Build scenario impacts are proposed to be mitigated by signal timing changes. The proposed timing changes will favor exiting Route 93 traffic but will still cause significant delays and likely backup to Route 93. The signal time will further exacerbate anticipated problems from Harvard Street to Mystic Valley Parkway. The Proponent fails to acknowledge the deleterious effects on the South Medford neighborhood and Mystic Avenue business area. These issues must be addressed prior to occupancy.

1

Of continued concern is the exacerbation of traffic and safety issues at Wellington Circle. Proposed Mitigation includes geometric improvements and signal timing improvements. The creation of additional lanes at Wellington Circle is ill conceived. This area is already extremely difficult to navigate and unsafe. The plan also continues to neglect pedestrian safety in this area. The below grade separated roadway must be advanced prior to occupancy of this project.

2

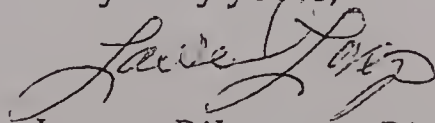
The proposal by the Proponent to utilize up to 1,000 off-site parking spaces for employees was first raised in the DEIR. The FEIR does not adequately address the traffic impacts to the Wellington Circle Area. The FEIR also does not assure that existing MBTA Park and Ride Spaces will not be replaced with employee parking.

This is of particular concern due to the delayed extension of the Green Line to Medford and the proposal of the MBTA to offset impacts by the creation of Park and Ride spaces in Beverly and Salem. Air Quality in Medford should not deteriorate due 3 to the delay in the implementation of necessary transportation improvements or the addition of unnecessary vehicles for employees who have traveled to the area by vehicle.

The City requests that the Proponent be responsible for additional mitigation at the noted intersections, provide long term monitoring of intersections within the City 4 by an independent party, and fund the construction of any improvements necessary to offset any unforeseen impacts.

Attached to this letter is a copy of the peer review conducted by the City's consultant, Greenman - Pedersen, Inc. Their comments and recommendations are incorporated as part of this letter. Thank you for your consideration of these comments.

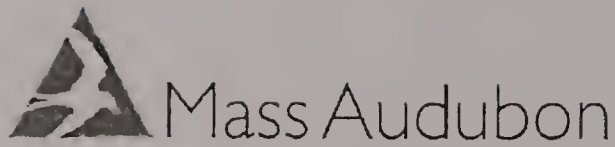
Very truly yours,



Lauren DiLorenzo, Director

Attachment

Cc: Michael J. McGlynn, Mayor
Marc Draisen, Executive Director
Metropolitan Area Planning Council



Mass Audubon

Advocacy Department

Six Beacon Street, Suite 1025 • Boston, Massachusetts 02108
tel 617.962.5187 • fax 617.523.4183 • email jclarke@massaudubon.org

August 8, 2014

Secretary Maeve Vallely Bartlett
The Commonwealth of Massachusetts
Executive Office of Energy and Environmental Affairs
Attn: MEPA Office
Anne Canaday, EEA #15060
100 Cambridge Street, Suite 900
Boston, MA 02114

Via Email: anne.canaday@state.ma.us

Re: EOEEA #15060, Wynn Everett Casino Resort Project, Everett, MA

Dear Secretary Bartlett:

On behalf of Mass Audubon, I submit the following comments on the Final Environmental Impact Report (FEIR) for the proposed Wynn Everett casino resort project at the former Monsanto Chemical site in Everett. The site encompasses 33.9 acres, of which 8.3 acres are below mean high water on the Mystic River. The project involves 3 million square feet of development including a 504-room hotel, casino, retail and restaurant space, parking, and associated support facilities and amenities. The FEIR is extensive and addresses changes to the plans since the Draft EIR, consistency with local plans, air quality, energy use and Greenhouse Gas (GHG) emissions, transportation, wetlands, water supply, wastewater, stormwater, waste management, open space including public access under Chapter 91, hazardous waste, and mitigation.

Mass Audubon does not have a position on gambling, gaming, or casinos in general. We do, however, seek to ensure that development of large scale destination-type resort casino complexes avoids, minimizes, and/or mitigates environmental impacts as much as possible. The law that established gaming in Massachusetts (*Chapt. 194 of the Acts of 2011*) set mandatory and optional qualifying criteria for the Gaming Commission to consider when reviewing and deciding on gaming applications. Mass Audubon believes that, to the fullest extent possible, the highest standards of green development and sustainability should be required in all state and local licensing and permitting of gaming facilities. Equitable distribution of mitigation funds to Everett and other appropriate surrounding communities is also important to offsetting costs related to casino construction and operation.

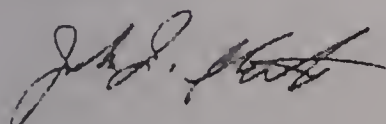
The project and site present several challenges and opportunities. Although detailed plans for cleanup of contamination of this former industrial site have not yet been prepared, the project design includes several improvements above and beyond basic cleanup for reuse. This includes a living shoreline with restored coastal bank, wetlands, and shellfish beds as well as public open space, along with plantings and stormwater management improvements. The location of this living shoreline and wetlands

restoration work in a high visitation urban park setting offers great opportunity to educate the public about the benefits of such projects and the possibilities for application of these techniques at other sites. The design takes sea level rise into account with all structures at least 7.5 feet above the existing 100 year flood elevation. The project also includes water access and potential for future expansion of a publicly accessible harborwalk onto adjoining properties, taking the overall setting and community connections into account. The project will meet LEED design rating of Gold or higher, with the possibility of achieving Platinum rating if on-site cogeneration and PV are selected in the final design. The project has also incorporated energy and water efficiency in numerous ways. Traffic congestion in the project vicinity is a significant challenge. The FEIR includes proposed transportation demand plans, alternative modes of access, and infrastructure improvements.

Mass Audubon requested in comments on the ENF and Draft EIR that the project be designed to meet the new LEED Pilot Credit for Bird Collision Deterrence (PC55). Although the FEIR did not respond in detail to this request, it did indicate a willingness to consider bird-friendly building and landscape design if the project receives a license and moves forward to final design. Bird collisions with buildings are a significant factor in bird mortality. Design features such as alternatives to large expanses of reflective glass on facades and the placement of landscape materials in relation to buildings can greatly influence the degree to which a facility is or is not a hazard to birds. We continue to urge that the project be designed in a manner that will maximize the site's habitat value while minimizing bird collision hazards.

Thank you for considering these comments.

Sincerely,



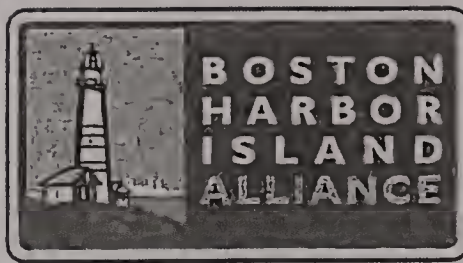
John J. Clarke
Director of Public Policy and Government Relations

cc: Judith Kohn, Fort Point Associates
Massachusetts Gaming Commission
Mayor of Everett
Everett Planning Board
Everett Conservation Commission
Mystic River Watershed Association

Mass Audubon works to protect the nature of Massachusetts for people and wildlife. Together with more than 100,000 members, we care for 35,000 acres of conservation land, provide school, camp, and other educational programs for 225,000 children and adults annually, and advocate for sound environmental policies at local, state, and federal levels. Founded in 1896 by two inspirational women who were committed to the protection of birds, Mass Audubon is now one of the largest and most prominent conservation organizations in New England. Today we are respected for our sound science, successful advocacy, and innovative approaches to connecting people and nature. Each year, our statewide network of wildlife sanctuaries welcomes nearly half a million visitors of all ages, abilities, and backgrounds and serves as the base for our work. To support these important efforts, call 800-AUDUBON (800-283-8266) or visit www.massaudubon.org.

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August 8, 2014

Secretary Maeve Valley Bartlett
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114
ATT: MEPA Office

RE: EOEA No. 15060- Final Environmental Impact Report
Wynn Everett, Everett

Dear Secretary Bartlett:

The Boston Harbor Island Alliance (BHIA) is a nonprofit organization whose sole purpose is to promote the public use and awareness of the Boston Harbor Islands national park area (the Park). The Park is one of only 400 national parks in the country, and one of the few in an urban area. The Park is not only a tremendous natural resource, but it is truly a regional treasure and a cornerstone of the local tourism experience, and it is within sight and a short boat ride from the project location.

This project, if approved, will be a significant addition to the waterfront recreational destinations in and around Boston Harbor. The applicant has put forward a proposal that incorporates a number of important environmental benefits, including the accelerated cleanup of a significantly damaged ecosystem and restoration of natural habitat and water quality conditions. The project also promises extensive improvements to support a robust water transportation network linking the project to sites in the Boston Inner Harbor, benefitting employees and commuters and reducing regional traffic impacts. We are also pleased with the effort the Proponents have put into public outreach and their willingness to engage with all parties to consider the project in its broadest harbor-wide context, including sponsoring a water transportation study by the Boston Harbor Association on which BHIA is collaborating.

Mitigation for the development impacts of this project presents an excellent opportunity to increase access to natural resources and recreational opportunities throughout Boston Harbor. We believe that expanding the proponents laudable commitments to water transportation to support a robust water transportation system harbor wide, including providing mitigation funding for water transportation to the Boston Harbor Islands national park area, is appropriate. Park managers and the BHIA would like to see the number of visitors to the Islands doubled in the next five years, and to do that and also maintain affordability will require broader subsidization of the water transportation system. BHIA has been the recipient of past mitigation and successfully implemented park enhancement amenities, in partnership with our local, state and federal partners.

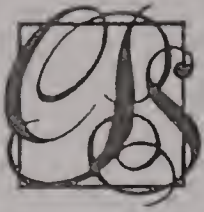
We applaud the project proponents for the environmental restoration benefits of their proposal and their commitment to expanding water transportation. Linking the development of the proposed project with support for water transportation is a unique opportunity to establish affordable access to the Boston Harbor Islands national park area.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Philip Griffiths". The signature is fluid and cursive, with a large initial "P" and a stylized "G".

Philip Griffiths
President



Design Review

A.C.

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John Benson
Peggy Bradley
Jack Glassman
Dan Kovacevic
Nick Kraman
Bill Lamb
Mark Spaulding
Annette Tecce

Charlestown Preservation Society Design Review Committee
P. O. Box 290201
Charlestown, MA 02129

Maeve Vallely Bartlett, Secretary, EOEEA
Attn: MEPA Office
100 Cambridge Street, Suite 900
Boston, MA 02114

James McHugh, Commissioner
Gayle Cameron, Commissioner
Bruce Stebbins, Commissioner
Enrique Zuniga, Commissioner
Rick Day, Executive Director

Massachusetts Gaming Commission
84 State Street, 10th Floor
Boston MA 02109

Re: EOEEA # 15060 - Wynn Everett FEIR

4 August 2014

COMMENTS ON THE WYNN EVERETT, JUNE 30, 2014 FEIR

Dear Secretary and Commissioners:

The Charlestown Preservation Society Design Review Committee (CPSDRC) appreciates this opportunity to comment on the Wynn Everett, June 30 2014 FEIR.

We believe that the traffic plans presented in the FEIR for the mitigated I-93N off-ramp and Cambridge Street/Maffa Way intersections leading into the existing badly functioning Sullivan Square traffic rotary present an inadequate traffic solution for Rutherford Avenue/Sullivan Square for the following reasons:

- The 2014 FEIR assumes that the long planned roadway reconfiguration designed to serve the development of a new pedestrian friendly smart growth community in Sullivan Square will not be implemented by the time the Wynn casino is opened. In accordance with an EOEEA request, we have been told, the drawings and analysis in the earlier DEIR that included the Sullivan Square redesign were dropped from the FEIR. The FEIR now retains the existing traffic rotary in all its traffic projections, a completely unsatisfactory solution to Charlestown's traffic problems.

CPSDRC comments on EOEEA #15060

- The FEIR does not show a capacity analysis including a Level of Service rating for the Rutherford Avenue and Main Street intersections at the rotary, though these, we have been told by the proponent's traffic consultant, would operate at level of service "F". 2 This means that they will cause significant delays, congestion, and environmental degradation on Rutherford Avenue and Main Street leading into the traffic rotary.
- The FEIR does not propose any solution to these traffic problems. But the DEIR did by designing a grid of streets to disperse traffic. We believe that the problems can be 3 resolved by integrating the proposed Cambridge Street/Maffa Way mitigation with the construction of the City's Sullivan Square area redesign plans as shown. In the DEIR (Fig. 4-81) these intersections (53c & 53d) in the 2023 Build Peak Hour capacity analysis were rated C and E respectively for Friday P.M. Therefore they are rated acceptable in the redesign plan.
- The FEIR does not include any documentation that we can find that accounts for signal times for safe street crossings for pedestrians, physically handicapped individuals, and bicycle traffic. Therefore, it is unclear to us whether pedestrian crossing movements 4 through Sullivan Square are accounted for and, if they are not, what their inclusion in a pedestrian friendly environment would mean to the intersection capacity ratings presented.
- The "Traffic Volumes" diagrams (figures 4-120 through 4-142) do not properly show traffic in the current underpasses under the traffic rotary. Howard Stein Hudson released a new Volume Comparison diagram with the underpass information today, 5 August 4. These changed numbers appear to be reduced as well as reassigned in the new diagram. This diagram requires further explanation and analysis.
- We note that retaining the traffic rotary and the underpasses is inconsistent with the City of Boston's Rutherford Avenue/Sullivan Square plans. This will significantly and 6 adversely affect the City of Boston.
- We believe that the proposed traffic mitigation is insufficient because the Main Street and Rutherford Avenue traffic approaching the rotary from the south will not work. Personal experience tells us that merging traffic from each of these two streets has to wait for a break in the traffic released at the Maffa Way and Cambridge Street traffic 7 signals. Therefore, at peak traffic times, Rutherford Avenue and Main Street vehicles will be held up trying to merge into the rotary. Note: you can see the Rutherford Avenue backup in the second (mitigated) video simulation in the MGC 20 June 2014 meeting included in the MGC "You Tube" archive.

CPSDRC comments on EOEEA #15060

- In response to a comment by the Charlestown Neighborhood Council, the FEIR (page 15-139) says that “The proponent is committed to working with the neighborhood and the City of Boston to mitigate potential traffic impacts and will participate in the development of plans to improve Sullivan Square”. If the proponent is truly committed to this, why has he altered the DEIR so that the FEIR makes no recognition of the plans for the Sullivan Square area redesign which have been honed by the City and the neighborhood in a multi-year process? On the contrary, this change indicates that this statement by the proponent is not in good faith and that its expressed commitment cannot be expected to be sincere or effective. 8

We ask that the EOEEA decide that this Final Environmental Impact Report is inadequate for the licensing of the Wynn Everett Casino.

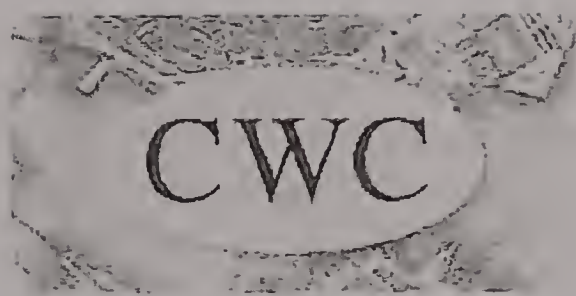
Sincerely,

William P. Lee

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AUG 06 2014

MEPA



A.C.

*Charlestown Waterfront Coalition
P.O. Box 290533
Charlestown, Massachusetts 02129*

Maeve Valleley Bartlett
Secretary, EOEEA
100 Cambridge Street
Boston, MA 02108

Attention: Ann Canaday ✓

EEA# 15060

August 5th, 2014

Dear Madam Secretary:

The Charlestown Waterfront Coalition is a community based advocacy organization whose mission is to protect and enhance the Charlestown waterfront including the Mystic and Charles Rivers and the Harbor shore. As such, we have been an important voice in many shoreline development projects. Over the years, as development opportunities in the Navy Yard were fulfilled and the build out completed, we turned our attention to the two rivers. CWC has participated for years in the Charles River Basin Advisory Committee meetings and is a charter member of EPA's Mystic River Watershed Steering Committee.

CWC has serious concerns about the Wynn Massachusetts FEIR, particularly in three areas: the absence of detailed plans for site remediation and construction management, and in regard to insufficient traffic analysis. Remediation and build activities will seriously impact Charlestown and air quality, noise and traffic flows, as excavation materials must go out of state, and supplies and materials must come in from disparate sources, many presumably on Rt. 93.

Furthermore, these activities will affect both the air and water quality on and in the Mystic River, a river long neglected by state and local environmental activism.

Wynn forecasts dredging 12,700 CY for the proposed marina, 1300 CY for the proposed living shoreline, and 2300 CY of clean fill coming in for the area below the MHW line. That work will all be done within 2/15 and 9/30 so as not to interfere with spawning fish. 1

Wynn's FEIR also anticipates digging to 35 to 40 feet for garage construction which has been expanded under the restaurant and retail section, requiring 765,000 CY to be removed for the entire construction. The FEIR indicates remediation will take 6 months, with additional contamination to be removed during construction of site roadways, landscape improvements and during the installation of new utilities. Clean up will cost between 14 and 20 million dollars, and will include a Licensed Site Professional.

Construction is to begin in late 2014, and be completed in 2017, predicted to be a 30-month duration. The waterfront work has no timeline, while the casino and resort are anticipated to take 16 to 24 months, with the possibility of on site material crushing. The Wynn team will notify local authorities and DEP if this crushing is required.

The FEIR states "Information regarding construction conditions and impact mitigation will be distributed to project site abutters," but not to Charlestown. In addition, there will be no public participation process under Chapter 21 E, unlike Charlestown's experience with Harborview Apartments' clean up of Parcel 4, and Spaulding Rehabilitation Hospital's clean up of Parcel 6, both in the Charlestown Navy Yard. Spaulding's clean up also took 6 months, requiring constant truck traffic on Chelsea Street. CWC believes the absence of a public process is a major shortcoming in the FEIR and illustrates graphically Wynn's failure to recognize his responsibility to this surrounding community. 2

Curiously, the FEIR recognizes that increased noise of approximately 35 decibels during construction will impact Charlestown, but the FEIR has no acknowledgement that the prevailing wind in the area is out of the northwest, and that particulates will be air born over the Mystic River and into Charlestown, affecting air and water quality. In addition, there is no discussion on trucking or Mystic River based barge routes to be taken to transport soil from the site to accredited disposal sites. 3

The FEIR storm water quality analysis states only "storm water runoff will be carefully managed during construction in accordance with state and federal regulations." There is no discussion of how the dredging for the marina or the remediation removal will impact Mystic River water quality. 4

And finally, the air quality analysis comes up equally short. The FEIR states, "the air quality impacts from the operation of the project subsequent to completion of construction will be limited to operational emissions" for generating heat and hot water. It states further that "increased vehicular traffic volume will slightly increase regional emissions of motor pollutants" due to project mitigation of impacts with improved signalization and an aggressive TDM program. Any analysis of remediation and construction impact on air quality is missing.

CWC considers the absence of air and water quality analysis on remediation strategies and construction management to be a critical shortcoming. Charlestown

and the river are south east of the Monsanto site and with the prevailing wind coming out of the northwest, will be the recipient of air born releases. CWC ⁶ requests that the Secretary withhold the award of a certificate, and require Wynn to submit a supplemental EIR with a detailed analysis of air and water quality during marina & shore restoration activities, and remediation and construction.

In summary, we urge the Secretary to require a Supplemental EIR to address the shortcomings outlined above. The current submission's inadequacy is substantial, and an affront to our common sense.

Sincerely,

Pamela Daly

Maureen Donovan

Guy Maccarone

Ivey St John

Bruce Swanton

Paul Sullivan

Jean Tochterman

Jean Wilson

CWC Steering Committee

CC

John Ziemba, Massachusetts Gaming Commission

Canaday, Anne (EEA)

From: Grafmeyer, James [JGrafmeyer@ddr.com]
Sent: Friday, August 08, 2014 10:36 AM
To: Canaday, Anne (EEA)
Cc: Erb, Chris; Farrell, James; Owendoff, Michael
Subject: Wynn Everett FEIR --Everett, MA --EEA No. 15060

Importance: High

Dear Ms. Canaday, I am responding to you on behalf of DDRC Gateway LLC, who is the owner of Gateway Center, a 640,000 square foot shopping center off of Mystic View Road. I communicated with you earlier when we also conveyed comments to the Wynn DEIR. As you are surely aware, we are NW and immediately adjacent to the proposed Wynn casino project and we are very concerned over their traffic generation and the negative impacts it could have on the operation of our shopping center. With this said, the following summarizes our concerns and comments related to the Wynn Everett Final Environmental Impact Report (FEIR).

Even though the Wynn Everett project has grown in size by 420,000 sf (2.6M sf to 3.0M sf), we acknowledge the fact that by introducing additional strategies (e.g. bus shuttles, employee incentives to use public transportation), it has reduced slightly the peak hour trips previously reported in the DEIR. However, their analysis is incomplete and was done in a vacuum by only looking at the two (2) signalized intersections at Santilli Circle without taking into account the unsignalized intersections with the circle. Please note the following:

- Overall comment – the traffic analysis only reports anticipated operations at the two (2) signalized intersections located along the circle. These signalized intersections are projected to operate at a Level of Service B with the implementation of the eastbound flyover. However, there was no supplemental analysis of all the unsignalized 1 approaches to the circle (Mystic View Road, Frontage Road and Santilli Highway) and by not doing so, it does NOT reflect reality whereby the effects of operations for the entire circle is still unknown.
- Mystic View Road – when looking at the east signal at the circle, it is projected that northbound queues on the circle will be approximately 200 feet (Friday and Sat. peak hours) and it will back up to the merge area with Mystic View Road. Since this was not evaluated, this condition is a great concern to us where it could create 2 unacceptable delays and severely impact the maneuverability of vehicles. In addition, the effect of our main Gateway Center access drive with Mystic View Road also needs to be studied due to this snowball effect along the circle where backups will be commonplace.
- Frontage Road – even though the approach of Frontage Road to the circle will be widened to two lanes, no evaluation was done to see if this really will work efficiently without a traffic signal, especially due to the close 3 proximity of Santilli Highway.
- Santilli Highway – at the west signal along the circle, queues will routinely block Santilli Highway and will extend back to the Frontage Road intersection. Again, no analysis was done with respect to this condition and the subsequent impact it will have on the overall operation of the circle. There are very high traffic volumes on the traffic circle and coming from Santilli Highway, and there is no evidence presented that these volumes can be 4 accommodated in the very short merge area between Santilli Highway and Mystic Valley Parkway (westbound). Due to the 1,400 vehicles projected to enter Mystic Valley Parkway westbound at this location, it puts into serious question the capacity of the on-ramp to handle this significant volume of traffic.

The reason we commented on the various circle intersections above is to clearly show you that the operation of the overall circle will in all likelihood negatively impact our shopping center operation. There are eight (8) ramps accessing and egressing the circle that were completely ignored and not evaluated. Based on this, there is no way to determine whether the proposed roadway improvements by Wynn will truly mitigate their project impacts and in fact, they may

make matters worse. We feel without a detailed traffic analysis that studies all points of access along the circle, not just signalized intersections, one cannot assume that the proposed improvements are sufficient and appropriate. Since our shopping center is accessed from Mystic View Road, you should now understand our serious concern, especially if our customers cannot reasonably reach our center to shop. Not only will our operational profit suffer, but it could result in a significant decrease in value of the property.

I trust you will give serious consideration to our comments above. If you have any questions, please feel free to call me at 216-755-5880. Also, if you could email me back to acknowledge that you received this email, I would appreciate it.

Thanks.

Jim Grafmeyer
Vice President of Development

DDR Corp.
3300 Enterprise Parkway
Beachwood, Ohio 44122
P: 216.755.5880 // F: 216.755.1880 // M: 216.577.3320
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Mystic River Watershed Association
your community • your watershed

August 7, 2014

Secretary Maeve Vallely Bartlett
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office, Anne Canaday, EEA No. 15060
100 Cambridge Street, Suite 900
Boston MA 02114

Re: EEA 15060, Wynn Everett FEIR

Dear Secretary Bartlett:

The Mystic River Watershed Association (MyRWA) appreciates this opportunity to comment on the Final Environmental Impact Report (FEIR) filed for the proposed Wynn Everett Casino.

The Mystic River Watershed Association is a 501(c)(3) nonprofit organization founded in 1972 by a group of concerned citizens. MyRWA's mission is to protect and restore clean water and the natural environment to a healthy state in the basin's 22 communities and to promote responsible stewardship of our natural resources through educational initiatives. A small organization, MyRWA accomplishes its mission by forging links with citizens' groups, universities, businesses and government agencies. These alliances permit MyRWA to work throughout the watershed, documenting current conditions and advocating for resource management and protection.

This collaborative approach has created a strong watershed voice and is helping to attract much-needed public and private resources to the Mystic. As an environmental organization, MyRWA is particularly attuned to how proposed projects will improve existing conditions within highly urbanized areas of the Mystic River Watershed.

MyRWA acknowledges and appreciates that the proposed project will accelerate the cleanup of a significantly damaged ecosystem including restoration of a heavily contaminated site with significant waterfront on the main stem of the Mystic River. Such restoration of a keystone parcel in the Mystic River watershed has the potential to make a significant difference to water quality and natural life in the watershed and in the life of watershed communities.

From its very first comments on the project, the Mystic River Watershed Association encouraged that, given the scale and scope of the proposed Resort Casino and its location on the banks of the Mystic River, Wynn Resorts has an opportunity to make an extraordinary contribution to the revitalization of the Mystic River waterfront and to restoration of natural habitat and water quality conditions in the river.

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Our Association's position has been consistent. In comments I sent to the Massachusetts Gaming Commission in September, as Chair of the Mystic River Steering Committee, I joined our partners in calling for the Gaming Commission to "give strong consideration in its decision making to initiatives that provide for protection and restoration of the local environment." We hope that the Commission will embrace this recommendation and we appreciate the Secretary's efforts to make clear the details of this proposal.

At the Wynn project site, MyRWA has consistently urged the developer to substantially engage restoration of the water's edge and the coastal resource areas and undertake substantial ecological restoration along the Mystic River as part of the project program. MyRWA pointed out that the emergence of new salt marsh adjacent to the project site provides substantial evidence that restoration and protection of river bank and river habitat is feasible and that a more naturalist approach to site development and to the water's edge was appropriate, particularly because the subject site is located upstream from the more industrialized areas of riverfront in the Designated Port Area (DPA).

As we have previously stated we are pleased to see that the Wynn Resort development team has embraced these comments and substantially modified the approach in the ENF. The Living Shoreline approach represents for us an important component of the public open space proposed on the banks of the Mystic River and will serve as an important model for future development and other salt marsh and habitat restoration along the Mystic River waterfront. Plans presented with the FEIR indicate that elements of the Living Shoreline have been enhanced and that restoration in the tidal areas has been expanded in size. These changes represent continued improvement of the original concept and we applaud this effort to expand and enhance public open space and nearby tidal and wetland areas.

In addition MyRWA offers the following specific comments and suggestions in specific areas of the proposal that have direct impact upon concerns of the Mystic River Watershed Association.

Coastal Resource Areas (Wetland Protection Act)

- The project proposes significant work within protected Resource Areas, and the proponent has done a thorough job addressing these issues in Chapter 3 of the FEIR. In this Chapter, issues associated with Wetland Protection Resource Areas, Coastal Wetland Resource Areas, Chapter 91 Tidelands and Coastal Zone Management Consistency Review are addressed and the proponent outlines how the project proposes to comply with these various requirements. All Resources Areas have now been substantially addressed and the proponents have provided a clear overlay of proposed conditions and impacts in relation to the existing conditions (Resource Areas) plan so that an adequate review of impacts and mitigation can be made. A comprehensive plan showing impacts as well as mitigation areas is available.
- In its EENF comments dated July 12, 2013, MyRWA expressed concerns that the EENF Chapter 7 (Mitigation) did not discuss Resource Area mitigation in any serious way. This concern was successfully addressed in Chapter 8 of the DEIR and has been reiterated and expanded upon in Chapter 3 of the FEIR.

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Public Access to the Waterfront (MGL Chapter 91)

- According to the DEP website “Through Chapter 91, the Commonwealth seeks to preserve and protect the rights of the public, and to guarantee that private uses of tidelands and waterways serve a proper public purpose” and “Preserves pedestrian access along the water's edge for fishing, fowling and navigation and, in return for permission to develop non-water dependent projects on Commonwealth tidelands, provides facilities to enhance public use and enjoyment of the water.” MyRWA is happy to see that the proponent has proposed significant public outdoor open space to be constructed on the waterfront and enhanced connectivity to adjacent bicycle paths and pedestrian walkways.
- As previously stated MyRWA also applauds efforts to take a more naturalist approach to the waterfront and in the areas of public walkways and open space that are proposed to be developed on site.
- In addition MyRWA acknowledges and appreciates that the proponent has maintained a reduction of building footprint in order to create more outdoor open space with access to the riverfront. Providing engaging access to the waterfront fulfills a significant need.

Until now, residents of the City of Everett and indeed surrounding communities have had limited access to the river. As a result of unwelcoming conditions and numerous hazardous waste sites along the waterfront, Mystic River residents have been largely cut off from the recreational opportunities this natural resource represents.

Public space amenities to be created on site and connection to regional bicycle and pedestrian pathways will help remedy this condition and help fulfill the intent of Chapter 91. Proposed construction of a New England salt marsh and other improvements along the pathways and in the open space at the southwestern end of the parcel will connect visitors the local natural environment and the Mystic River and allow local residents to engage and celebrate these improvements to local natural habitat and river ecology.

- While we celebrate the innovative changes described above, MyRWA reiterates its recommendation the developer support a canoe/kayak rental program at this location providing direct access for the general public to the boat basin that is being created. Such a facility would provide rare access to the water sheet to residents who may have no other way to actively engage the river for recreation. This low cost concept has the potential to benefit many residents in the area.
- MyRWA recommends that the location, dimensions and intended uses for outdoor space continue to be closely examined as further permits are issued for the facility to ensure that the project proposal is fully compliant with Chapter 91.

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Sustainable Design and Sea Level Rise Considerations

- The project has a stated goal of “Designing the building to be certifiable under the Green Building Council Leadership in Energy and Environmental Design (LEED) rating of Gold or higher.” MyRWA applauds this goal and appreciates that the proponents have embraced its suggestion that consideration be given to green roof technology.

Green roofs have proven efficacy in reducing urban heat pollution, in improving stormwater runoff quality, and possibly providing additional detention capacity to the site. MyRWA is very pleased to see this addressed in Chapter 13 Mitigation Measures of the FEIR.

By adding green roof and other LID/LEED components to the project, proponents have substantially advanced their efforts to become a more sustainable project. In addition through rainwater harvesting, grey water proponents will help further reduce project water demand and use. The Mystic River Watershed Association applauds these efforts to engage these and other sustainable design principles at the site.

- Provision of an expansive salt marsh along the waterfront as illustrated in Figure 3-7 and elsewhere in the FEIR is consistent with recent documents MyRWA has reviewed regarding Climate Change Adaptation. The inclusion of a soft waterfront and salt marsh provides a capacity for storm surges to be more naturally attenuated. The Boston Harbor Association publication “Preparing for the Rising Tide” (February 2013) points out the advantages of “living shorelines and wetlands” in helping to absorb the impacts of floods. MyRWA applauds the proponent’s efforts to include this feature in its plans.

Stormwater Quality

- MyRWA is pleased to see substantial improvement and expansion of efforts on site to address stormwater quality. Details provided in FEIR address requirements of the Stormwater Standards and Wetland Protection Act and bring the project ever closer to the promise made in the EENF to “... incorporate advanced stormwater design to achieve quantity and quality goals”. The addition of green roof technology also enhances efforts to address stormwater quality.
- As outlined originally in the DEIR and as further narrated in the FEIR, substantial expansion and enhancement of stormwater systems on site will help support the statement made in the EENF that “The Project will not impair the water quality of nearby water bodies.”

In addition, as was recommended by MyRWA in its comments on the EENF, the robust improvements to stormwater management plans presented in the FEIR will help ensure that stormwater discharge from the project will not impair water quality in the receiving waters.

The Mystic River Watershed Association acknowledges the many changes made to the proposed project plans since the filing of the EENF. In the DEIR, and FEIR project proponents have addressed many of the issues raised by MyRWA in its previous comments.

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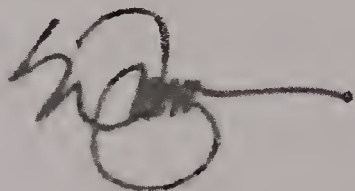
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We are pleased to see that the Wynn Resort development team embraced MyRWA comments and those of other environmental advocates and has purposely modified its approach and site plan for the project during the MEPA process. The Living Shoreline will serve as a model for future development along the Mystic River waterfront and inclusion of a soft waterfront and salt marsh will provide greater capacity for storm surges to be more naturally attenuated. Connection and improvements along area bicycle and pedestrian pathways will help connect visitors to the local natural environment and the Mystic River and help support advocacy for local natural habitat and river ecology. The Association also appreciates that in response to our expressed concerns the building footprint and size was modified in order to create more public outdoor open space with access to the riverfront. Providing engaging access to the waterfront fills an essential need. It is important also to underline that the Wynn Everett project proposed to undertake remediation of a significant hazardous waste site that has until now remained a blighted parcel on the Mystic River waterfront. Restoration of this brownfield to productive use will provide substantial benefit to Mystic River communities and to the river itself.

The Mystic River Watershed Association plans to continue to monitor the proposed project as it moves forward and will remain in contact with the proponent and relevant authorities during the preparation and review of other Federal, State and local permit applications. We are encouraged by the approach and improvements to site planning and proposed mitigation made to date and by the stated commitment of the Wynn Everett development team to set high standards of excellence with regard to site design and environmental protection.

Thank you again for this opportunity to comment on this significant project proposal. If you have any questions or require additional information please contact me at (781) 316-3438 or at EK@mysticriver.org

Sincerely,



EkOngKar Singh Khalsa, Executive Director
Mystic River Watershed Association

cc: Jamie Fay, Fort Point Associates
Massachusetts Gaming Commission
Mayor Carlo DeMaria, Jr.
Everett Planning Board
Everett Conservation Commission
Mass Audubon
Saugus River Watershed Council

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8 August 2014

Secretary Maeve Valley Bartlett
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114
ATT: MEPA Office

RE: EOE No. 15060- Final Environmental Impact Report
Wynn Everett, Everett

Dear Secretary Bartlett:

The Boston Harbor Association, a non-profit, public interest organization founded in 1973 by the League of Women Voters and the Boston Shipping Association to promote a clean, alive, and accessible Boston Harbor, is in receipt of the Final Environmental Impact Report for the Wynn Everett project. Wynn MA, LLC, the project proponent, is proposing a 3.03 million square foot hotel/resort and gaming facility in Everett along the Mystic River.

The Boston Harbor Association (TBHA) has commented extensively on the proposed project, as well as on the Everett Central Waterfront Municipal Harbor Plan. The project has increased by 419,542 sq. ft. since the Draft Environmental Impact Report filing, with some increases in the gaming floor, entertainment/nightclub, and food/beverage spaces. By far the most significant increase is in the parking garage, with an additional 374,970 sq. ft. to accommodate 791 more parking spaces. Conversely, the hotel tower has been reduced by 83,396 sq. ft. and retail and convention/meeting spaces have been reduced by 13,946 sq. ft.

The Final Environmental Impact Report includes more specific funding for water transportation, as well as a more generous HarborWalk segment at the perimeter of the Project Site peninsula, both of which we strongly support and commend.

Our comments follow:

Change in proportion of uses: Similar to our comments on the Draft Environmental Impact Report, we note a continuing shift in the proportion of uses outlined in the FEIR, specifically a further 14.7% increase in the gaming area (also a justification for more parking), a 12% increase in food/beverage space, a further 13.3% reduction in retail spaces, and a 5% reduction in convention/meeting spaces. It is not clear whether the change in uses will affect the modal split of users, i.e., individuals who come to the gaming area may/may not travel to the site by transit versus private automobile in the same ratio as families and others who may primarily be going to the project's restaurants and cafes. We ask that the proponent look at this further.

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Proposed reliance on automobiles: As noted in both the Draft and Final EIRs, there are extensive challenges for the regional road system in and around the site as a result of the project. Additional vehicles from the proposed project will further exacerbate the situation. The Secretary's 21 February 2014 Certificate on the Draft Environmental Impact Report was specific about avoiding, minimizing, and mitigating vehicle emissions "to the maximum extent feasible through establishment of aggressive mode share goals supported by investments in transit infrastructure and strong user incentives..." (page 28 of Certificate), implementing Transportation Demand Management measures "designed to ensure patrons and employees use transit to the greatest degree possible" (page 31), and encouraging the proponent "to reduce the amount of proposed parking to further reduce impervious surfaces and support aggressive mode share goals" (page 32 of Certificate).

2

Given the consistent language within the Secretary's Certificate, we were very surprised at the addition 791 parking spaces proposed in the Final Environmental Impact Report. According to the FEIR, "While employees will still be required to park off-site, since filing the DEIR, the Proponent has identified a need to provide additional on-site parking spaces to better accommodate patrons and support additional gaming positions" (page 1-4 of FEIR). The addition of nearly 800 parking spaces to the project is counter to the Secretary's Certificate and the Scope of the FEIR. Consistent with its scope, we ask that the Secretary's Certificate for the FEIR require the proponent to reduce the number of parking spaces to less than the 2,909 parking spaces noted in the Draft EIR.

3

Support for water transportation: We highly commend the project proponent for their significant contribution to the development of a robust water transportation system. Last year, Wynn Resorts contributed \$50,000 to The Boston Harbor Association and the Boston Harbor Island Alliance to support an analysis and recommendations for an enhanced water transportation system in Boston Harbor. Findings from the analysis will be released in early September.

As part of mitigation measures outlined in the Final EIR, the proponent is proposing to institute frequent passenger water transportation service between the project site and key Boston Harbor landings. Stops will primarily be in Downtown and South Station, with expansion as need increases. The proponent plans to provide \$8.6 million in capital funds for water transportation, which they have indicated to us that \$7.2 million will be used towards the purchase of four special purpose vessels and \$1.4 million will be for docks. Boat operators in the region whom we contacted thought that this is an appropriate amount for the purchase of four vessels.

An additional mitigation measure offered by the proponent is an annual operating subsidy of \$3,303,000 for the water shuttle service (page 13-27 of FEIR). This is an annual operating subsidy for the life of the Wynn project. Boat operators whom we contacted thought that this is a realistic amount for annual operation costs for vessels with two crew members operating 18 hours a day. Obviously, the annual operating cost will vary, depending on the aggressiveness of schedules, the associated fuel usage, and the age of

the vessel (as the fleet ages, maintenance costs will increase), but \$3,303,000 is a good annual start for the annual operating subsidy.

Accordingly, we ask that the Secretary's Certificate for the FEIR require a minimum capital expenditure of \$8.6 million for four special purpose vessels and related docks which must be fully ADA accessible, and a minimum of \$3,303,000 in annual operating subsidy for the water transportation service each year for the life of the project. We further request that the Secretary's Certificate require that any fares for water transportation service be consistent with the MBTA fare structure for Boston Inner Harbor water shuttle service.

The FEIR notes that the service will operate between the project site, Downtown Boston (Long or Rowes Wharf), and South Boston (World Trade Center). We ask that the Secretary's Certificate require a minimum of at least four geographic areas to be served, and that the Chapter 91 License application process be used to finalize the actual locations. During the Chapter 91 License application process, it may become apparent, for example, that ridership would improve with stops at the Fan Pier (rather than the World Trade Center) and at the Charlestown Navy Yard. 4

We further ask that, as part of the transportation mitigation, the Secretary's Certificate should require the proponent to actively market water transportation to employees, patrons, and vendors. The FEIR projects only about 6% water transportation usage by visitors. We believe that the new fleet being designed for this project will make water transportation an extremely attractive option for visitors, thereby also helping to reduce automobile usage. We ask that the Secretary's Certificate require active marketing of water transportation service, with a minimum goal of 12-15% of patrons coming by water transportation.

Finally, we again reiterate our support for conversion of the atrium winter garden (FEIR Figure 2-19) into the waiting area for water transportation. Use of the atrium space would provide a grand entrance for arriving guests, as well as a beautiful departure point for water transportation users.

Support for public realm: The HarborWalk will be at least 10-14 feet wide, and will now be widened to 20 feet in certain areas, which we strongly support and commend the proponent for making this change. This will help create a larger area for local families to enjoy and utilize by the water's edge.

It is still not clear how the connection from the HarborWalk to the front of the building and to the public rest rooms can safely be accessed by the general public. It appears that the public may have to cross four lanes of roadway. While those who drive to the site can enter the building from elevators from the underground parking, it is not clear how those who are walking along the HarborWalk and/or enjoying the public open spaces or coming from the boat dock can safely cross to the entrance of the building. 5

The proposed Gateway Park bicycle and pedestrian connection will be an excellent connection to other parts of the existing Dept. of Conservation and Recreation's Gateway Park. Assuming that permission can be gotten from the MBTA, DDRC Gateway, and DCR, this addition by the proponent will also include benches, lighting, bike parking, interpretive signage, overlook areas, and landscaped areas.

Environmental enhancements: As we stated previously, we are very supportive of the "Living Shoreline" to be created with the removal of contaminated soils and invasive vegetation. A 40-50 feet wide vegetated margin will be created with a band of coastal bank vegetation and salt marsh, as well as native herbaceous and shrub vegetation along 550 linear feet of the Mystic River. Approximately 10,260 sq. ft. of disturbed Coastal Beach/Tidal Flats will be transformed to salt marsh. Above the elevation of the new salt marsh, 10,730 sq. ft. of Coastal Bank and Riverfront Area will be vegetated with native coastal plantings.

This, together with the proposed reseeding of soft shell clam beds to create about 15,000 sq. ft. of oyster reef in Land Under Ocean, will further help to improve what has been a contaminated, underutilized site. The Boston Harbor Association strongly supports these significant, creative environmental restoration efforts. We ask that the Secretary's Certificate require the completion of these efforts by the issuance of the first certificate of occupancy.

6

Climate change adaptation: Like the Draft Environmental Impact Report, the Final EIR has general, preliminary language on measures that will be incorporated into the building design to ensure a resilient project. The proponent has committed the elevation of the lowest floor, the retail wing, to 12.35 feet, and the main building 18.35 feet, well above current estimated climate change scenarios, which are good starts.

The Secretary's Certificate states, "The FEIR should include additional information regarding measures that were identified in the FEIR and indicate whether they will be incorporated into the design or operation of the project or will remain under consideration" (page 33 of Secretary's Certificate) and encouraged the proponent to consider scenarios for sea level rise identified by CZM and EOEEA. This information is missing from the FEIR, and we ask the Secretary to require the completion of this vulnerability analysis to ensure a resilient project.

Thank you for your consideration of our comments.

Sincerely,



Vivien Li
President

The Boston Harbor Association

A.C.
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5 Middlesex Avenue, Suite 401
Somerville, MA 02145
PH 617.684.1500
FX 617.623.3601

Maeve Valley Bartlett
Executive Office of Energy and Environmental Affairs
100 Cambridge St., Suite 900
Boston, MA 02114

Attention: Ann Canaday, MEPA Office

Re: EEA# 15060

Dear Secretary Bartlett,

Federal Realty Investment Trust, the Commonwealth and the City of Somerville have partnered to successfully implement a game-changing economic development project at Assembly Row, a project that has fueled economic revitalization throughout Somerville and the surrounding region. With significant investment remaining to be made in future phases of Assembly Row, including the potential for more than two million square feet of office and laboratory space, we are concerned about the impacts of the proposed Wynn Everett Casino, directly across the Mystic River.

In particular, our concerns that are most germane to MEPA revolve around:

- Clean up of the contaminated sediments. What is the plan to prevent 1
contaminants from impacting DCR's Draw7 Park and Baxter State Park?
- Traffic in Sullivan Square. What is the plan for improving Sullivan Square, which
has a LOS of F and no mitigation despite the high volume of casino traffic that 2
will be added to failing intersection?

Contaminated soils and sediments

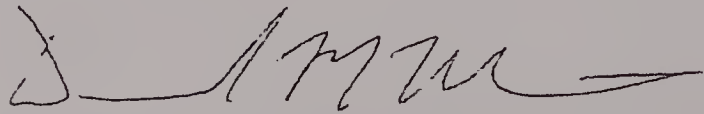
Wynn forecasts dredging 12,700 CY of sediment for the proposed marina and 1,300 CY of materials for the proposed living shoreline. To date, there has been no detailed explanation from the casino proponents regarding management of contaminated sediments and soils. A supplemental filing should be required providing a thorough plan for cleanup of both upland areas and sediments, including the means and methods that 3
will be used during construction and remediation to ensure public safety and public health.

Sullivan Square Traffic

The Wynn Everett Casino FEIR does not include analysis of traffic impacts on the Rutherford Avenue/Sullivan Square redesign and fails to recognize that casino traffic will seek out alternative routes on Main, Bunker Hill, Medford and Chelsea streets. Without a comprehensive traffic study and a viable mitigation plan, casino-related traffic will overwhelm Sullivan Square, creating congestion and gridlock with severe consequences for the regional economy, quality of life and the health of local residents. 4

We appreciate the opportunity to comment on the FEIR and we respectfully ask that you consider the serious impacts and omissions in this document and require a supplemental filing that addresses these issues.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Webster', with a long horizontal flourish extending to the right.

David Webster

Director of Development



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August 8, 2014

Mr. Richard K. Sullivan, Jr., Secretary
Commonwealth of Massachusetts
Executive Office of Energy and Environmental Affairs (EOEEA)
100 Cambridge Street, Suite 900
Boston, Massachusetts 02114

Attention: Anne Canaday, MEPA Office

RE: Proposed Wynn Casino Development in Everett, Massachusetts
Project Number EOEEA# 15060

Dear Secretary Sullivan:

We have been retained by The Batch Yard, a residential development located at the intersection of Route 16 and Route 99 in Everett. The owners of The Batch Yard have questions regarding the various impacts the Wynn Everett Casino Project will have on the Broadway corridor. On their behalf, we offer the following specific technical comments regarding the Transportation chapter of the Final Environmental Impact Report (FEIR), dated June 30, 2014, submitted in support of this Project.

Public Transportation

The proponent has estimated that 13% of patrons, and 33% of employees will use public transportation as a means of getting to and from the Project. It was also projected that 20% of employees would use the employee shuttle bus. It is unclear whether these estimates are realistic based on the type of trip and the capacities of the various public transportation modes. The Metropolitan Area Planning Commission indicates that only 7.3% of all person trips in the Boston area are made via public transportation. The proponent justifies the increase in public transportation trips by highlighting the proximity of the site to existing MBTA facilities and a shuttle bus which will run to the project site. The existing orange line stations are over a mile away from the site, although a shuttle bus to the site will be provided by the proponent. Studies such as MIT's "Transfers and path choice in urban public transport systems" suggest that increasing the number of transfers required on public transportation decreases the likelihood of someone choosing to take public transport.

The water transportation mode split has increased from 3% in the DEIR to 6% in the FEIR for patrons. The mode split for employees has remained at 3%. There is no data provided to justify the increase in ferry trips. The only validation given for the mode split is that 17% of patrons will be originating from the waterfront area and will lack access to personal vehicles. The conclusion is that they must all take public transportation in the form of taxis, mbta, or ferry service, with a 1/3 split going to ferry service.

STRATEGIC CONSULTING GROUP

There was no consideration for rental cars, or any study indicating that 33% of people in this area utilize water transportation when convenient. 1

Offsite Improvements

There was no longer any mention of interim improvements, however, it was not clarified when the proposed mitigation would be completed, and whether they would be completed prior to opening. In Chapter 15 of the FEIR it states "The Proponent understands the importance of the mitigation projects and will continue to work with MassDOT and surrounding cities to expedite design and construction. The timing of the mitigation commitments is further detailed in Chapter 16 of the FEIR." There was no chapter 16 included in the FEIR submission. The proponent should be required to implement all mitigation prior to opening, otherwise, impacts unfairly burdens all of the adjacent land owners with excessive delays. It is no secret that excessive delays have a very significant travel time cost which results in a drain on the local economy. More attention to traffic delays is important for a project of this scope and magnitude. 2

The Santilli Circle mitigation has changed significantly but still appears to address the safety and traffic related concerns at the intersection. In addition, the city of Boston has now reached a consensus on an alternative for Sullivan Square. The proponent is still suggesting the implementation of minor mitigation prior to the city's plan being implemented. However, the traffic impacts from the project related trips appear to have been accommodated within the scope of the proponent's mitigation suggestion. 3

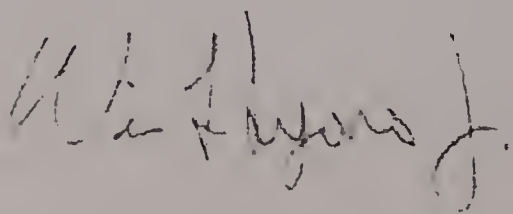
Many of the proposed improvements involve changes to signal phasing and timing. For a significant number of intersections, this appears to mean increasing time given to the main road such as Broadway and Route 16, and decreasing the time allotted for the side streets entering the roadways. 4 This results in lower overall LOS and delay for the intersection, but often means significant increases in delay and worse LOS for the side streets. This will make it more difficult for traffic to exit the neighboring properties. Access to and from adjacent property should be maintained.

Conclusions

The analysis contained in this FEIR demonstrates that the impacts of the Project on the roadway network can not completely be mitigated without adverse impacts to neighboring properties. In summary, we believe that the proponent has an obligation to fully mitigate its impacts.

We appreciate the opportunity to offer our comments on this Project. Should you have any questions regarding this letter, please do not hesitate to contact me directly at (877) 305-4163.

Sincerely,
FORT HILL INFRASTRUCTURE SERVICES, LLC



William F. Lyons Jr., P.E., Esq.
President

LIZ LEVIN
& COMPANY MANAGEMENT CONSULTING

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August 3, 2014

Gayle Cameron, Commissioner
James McHugh, Commissioner
Bruce Stebbins, Commissioner
Enrique Zuniga, Commissioner
Rick Day, Executive Director

Massachusetts Gaming Commission
84 State Street, 10th Floor
Boston MA 02109

Re: Wynn Casino

Dear Gaming Commission Members,

I am a Charlestown Resident who lives on Bunker Hill St. near Sullivan Square. My Charlestown neighbors and I have devoted countless volunteer hours to help the City of Boston develop the Rutherford Ave./Sullivan Square Redesign Plan (Redesign Plan). The Redesign Plan improves traffic flow and makes our community more transit, pedestrian and bicycle friendly. When the Redesign Plan is built, my neighbors and I will finally be able to walk safely to the Orange Line and to drive safely through Sullivan Square without fear of an accident.

I appreciate that the Wynn proposal will create jobs, generate tax revenues, remediate a badly contaminated site and activate the Mystic River waterfront with water and open spaces uses. I also appreciate the work that the Wynn Casino has done in developing a more Sustainable Transportation Plan, particularly the Premium Park and Ride Service and the Ferry system. There are still, however, unanswered questions about the transportation impact of the casino on our Charlestown neighborhood and more mitigation is required. Here is what I see as the "common sense" mitigation that should be a condition of any Casino License issued to Wynn Casino

Specifically it is common sense that Wynn Casino:

1) Fund the Sullivan Square Phase of the Redesign Plan.

The FEIR shows the transportation impact of the Wynn Casino assuming that the Sullivan Square Rotary continues to be in place in 2023. The FEIR was silent on the impact of the Wynn Casino on the Redesign Plan except to say that the transportation mitigation improvements proposed by Wynn Casino would dovetail¹ with the City's future roadway options for the area. We all know that today's Sullivan Square rotary no longer works. It doesn't work for the traffic; it doesn't

work for safe access to the MBTA and it doesn't work for encouraging new development at Sullivan Square. Therefore, mitigating an antiquated traffic system that doesn't work makes no sense!! The DEIR wisely assumed that in the "No Build Condition" that the approved Redesign Plan would be in place. This assumption should have been carried forward in the FEIR, but wasn't. Wynn Casino should now be asked to prepare and submit to MEPA and GMC the detailed traffic analyses for the project assuming the Redesign Plan is in place. If selected for a Casino license, the Wynn Casino license conditions should require that Wynn Casino fund the Sullivan Square Phase of the Redesign Design improvements including changes to the plan as result of the Casino. It should also require that the Sullivan Square street network should be built as soon as possible. The Rutherford Ave. phase of the Redesign Plan could follow subsequently and be more traditionally funded and/or funded by capture of some of the increased tax revenues at Sullivan Square made possible by the new street network.

It should be noted that the analyses of the Redesign Plan to be submitted to MEPA and MGC should cover not only the intersections in the FEIR but those on the south side of Sullivan Square that were modeled in the DEIR. The intersection with Main Street has been particularly troublesome for the community.

2) **Reduce the Parking Garage to 2900 parking spaces.**

The FEIR Wynn Casino program now includes a robust transportation demand management program. That program reduces trip generation, which is excellent. However, the FEIR Wynn Casino program now also includes a far larger garage than previously (3,700 spaces versus 2,900 spaces). This sizeable increase is most likely not warranted. As Cambridge MA has shown, smaller garages are an integral element of transportation demand management programs. My suggestion is that GMC license conditions include the original garage size of 2,900 and require that any subsequent increase in the size of the garage be done only after the project is operational and the traffic works well. 2

3) **Strengthen the Transportation Monitoring Program and Enforcement**

The FEIR transportation mitigation includes a transportation coordinator, the setting of annual transportation goals, an annual monitoring program and annual public report on the goals and the monitoring. The dollars devoted to this effort are \$30,000 annually. The program elements and costs should be strengthened. The labor and data collection elements of the program particularly should be strengthened to make sure that the transportation coordinator is a professional and that critical traffic, pedestrian and bicycle count information as well as mode share information are adequately captured and shared with the community. Funds should also be available for enforcement by the City and State. In addition, there should be an option to extend the monitoring program for an additional five years if the traffic goals aren't met and/or traffic conditions are worse than predicted. 3

4) **Fund a Transit Study of the Orange Line.**

The Orange Line is a workhorse of the MBTA system. The MBTA is buying new Orange Line cars. With these new cars there is an opportunity to make power and track improvements that collectively would make the customer trips more comfortable and convenient all along the line. The study proposed here would contribute to moving forward important Orange Line improvements. It would help Wynn Casino's employees and customers who may choose to ride the Orange Line as well as residents of Charlestown, Everett, Somerville, Malden and Medford. 4

5) **Fund a Visioning Program for Charlestown.**

Charlestown residents do not have an overall master plan for future development along the south side of Rutherford Ave., the entire Sullivan Square and Mystic waterfront area. Many of us have been requesting that the BRA undertake a community visioning effort for that purpose. It would be appropriate for Wynn Casino to fund that study since Wynn Casino will impact development potential in the area. The study will help the community have a unified vision and provide the appropriate land use and zoning controls to attract development it wants and to discourage development it doesn't want. 5

6) **Fund Public Engagement in the Construction & Remediation Management Program**
Remediation & Construction of the Wynn Casino will be a major effort. There should be a well thought out public engagement program. Of particular interest to Charlestown residents will be traffic and public safety issues associated with construction traffic, closure of streets and site remediation. 6

We all have an interest in making Sullivan Square work.

- The City of Boston owns valuable property in the area that could be developed.
- The MBTA has an Intermodal Orange Line Station and Bus Station as well as the Charlestown Maintenance/Repair Facility as well as other property.
- Route 99 is a State Road.
- The residents and workers of Charlestown and Everett drive regularly through Sullivan Square and are often riders of the Orange Line and buses at that location.
- Wynn Casino needs good access through Sullivan Square for customers and employees.

We have watched this area languish for many years. It is our collective responsibility to fix it. The license conditions suggested here will assure that if the Wynn Casino is built we aren't just putting "lipstick on the pig of Sullivan Square" but are establishing a street network and neighborhood for the future.

Thank you for your leadership.

Sincerely,

Elizabeth K. Levin
Elizabeth Levin

Cc:

Mayor Marty Walsh, City of Boston
State Representative Dan Ryan
City Councilor Ayanna Pressley
City Councilor Sal LaMattina
Richard Davey, Secretary of Transportation
Beverly Scott, CEO/General Manager MBTA
John Ziemba, Gambling Commission
Mauve Valley Bartlett, MEPA
Marc Draisen, MAPC
Anthony Gallagher, City of Boston
Vineet Gupta, City of Boston
Allison Felix, MAPC
Keri Pyke, HSH
Chris Gordon, Dirigo Group
Jamie Fay, Fort Point Associates

John Vitagliano
19 Seymour Street
Winthrop, MA 02162
617-846-1105

August 7, 2014

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Analyst: Anne Canaday, EEA No. 15060
100 Cambridge Street, Suite 900
Boston, MA 02114

Subject: Wynn-Everett FEIR/ EEA No. 15060

Dear Ms. Canaday:

I respectfully submit these comments regarding the Wynn-Everett FEIR, EEA No. 15060, in particular the sections in Chapter 4 concerning the sponsor's claim that 6% of the project's patrons and 3% of its employees will access their site by water transportation, a projection that I strongly dispute. Based on my experience in Boston inner harbor improvement programs as a former Massport board member and most recently as a consultant on the new Chelsea Creek vertical lift bridge, involving working closely with the key Boston Harbor regulatory agencies such as the US Coast Guard, US Army Corps of Engineers, the Massachusetts Port Authority, MassDOT and others, I estimate that the Wynn-Everett water transportation passenger ridership projections of 6% and 3% are inflated by at least 100% in both patron and employee categories, even assuming optimum year round maritime operating conditions such as weather which rarely occur.

A significant harbor transit impediment to the Wynn-Everett water ridership projections is that of the bi-weekly closure of the section of the inner harbor by liquefied natural gas carrier (LNGC) vessels supplying the LNG storage facility at the Dstrigas facility in Everett located on the Mystic River approach to the Wynn-Everett casino site. This bi-weekly inner harbor LNG closure is mandated by US Coast Guard regulation, specifically Title 33 of the US Code of Federal Regulations as follows:

1. No vessel is allowed within two miles ahead and one mile astern of a LNGC vessel underway, nor within 500 yards on either side of such vessel. This essentially closes the segment of the inner harbor route from the World Trade Center and Long Wharf to the Tobin Bridge that Wynn-Everett requires in their FEIR.
2. No vessel is allowed within 400 yards of an LNGC vessel moored at the Dstrigas facility in Everett. This essentially closes the segment of the Mystic River required in the Wynn-Everett EIR for ferries to access their site. This condition typically lasts for 24 hours while the LNGC vessel unloads its cargo.

This regular bi-weekly LNGC inner-harbor closure alone represents approximately a 13% reduction of harbor availability for the Wynn-Everett water transportation ridership, which need to be adjusted downward accordingly. In addition to the LNGC harbor restrictions the US Coast Guard also restricts vessel traffic under the auspices of Title 33:CFR for non-LNGC reasons as required for various reasons. Overall these total harbor closures alone would reduce the availability of the inner harbor, including the Mystic River, for the Wynn-Everett FEIR water ferry route by at least 20% from the unrestricted conditions assumption on which the FEIR ridership projections are based, which need to be adjusted downward accordingly.

The complete Title 33 of the CFR is attached.

In addition to these regular harbor safety restrictions there are other maritime operational factors which I am thoroughly familiar with which are the basis of my estimate that the Wynn-Everett water ridership projections are inflated by 100%. 2

The Wynn-Everett DEIR is also deficient in its failure to acknowledge the serious safety and environmental consequences of the Wynn-Everett casino's close proximity to the massive Distrigas liquefied natural gas facility in Everett whose inherent safety is questionable enough that one of former Boston Mayor Thomas Menino's top priorities was the closure of the facility. 3
The Distrigas facility is unique in terms of its proximity to a major urban area.

Many detailed and credible studies have been completed by highly reputable sources demonstrating the enormous potential destruction associated with an LNG vapor cloud explosion from a breached LNGC vessel, stemming from either accidental or deliberate means. One scenario shows major damage over a mile from the source. The Wynn-Everett casino would be located 4,000 ft. from an LNCC vessel moored at the Distrigas docks, and closer to the main LNG storage tanks. Please see attached aerial entitled: Wynn-LNG Distance.

Note in particular the Boston Globe graphic, based on a Sandia Laboratories study, showing that the proposed Wynn-Everett casino site lies well within the predicted 4,200 ft. radius within which people would be severely injured from an LNG explosion. 4

I've also attached a copy of a Boston Fire Department study that shows the limitations of the department in coping with an LNG event.

Also attached are various media accounts from Boston Magazine, NBC News, etc.

I've also attached a copy of the Sandia Laboratories study at the end.

Thank you,

John Vitagliano



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