



MEMORANDUM

**FROM: MARC DRAISEN, EXECUTIVE DIRECTOR
METROPOLITAN AREA PLANNING COUNCIL**

TO: MASSACHUSETTS GAMING COMMISSION

**SUBJECT: COMMENTS ON PROPOSED BOSTON AREA (REGION A) CASINO LOCATIONS IN
EVERETT (WYNN) AND REVERE (MOHEGAN SUN)**

DATE: AUGUST 6, 2014

The Metropolitan Area Planning Council (MAPC) regularly reviews development proposals deemed to have regional impacts. The purpose of such reviews is to promote consistency of the proposed development with the goals of *MetroFuture*, the regional policy plan for the Boston metropolitan area, which was adopted in 2008; the Commonwealth's Sustainable Development Principles; the GreenDOT initiative; as well as decreasing adverse impacts on the local and regional environment.

In this memorandum, MAPC does not take a position on the merits of casino gambling. Nor do we suggest a preference for either of the two proposals, since the Massachusetts Gaming Commission (MGC) must make that choice based on a wide array of issues that extend far beyond the land use and transportation impacts assessed in this memorandum. In addition, MAPC recognizes that the citizens of Massachusetts will have the ultimate decision-making power when they vote in referendum this fall to determine if expanded gaming, including casinos, will be allowed in the state.

For full disclosure, I note that MAPC has performed casino-related work for the municipalities of Chelsea, Somerville, and Winthrop at their request, in order to assist them in the development of Surrounding Community Agreements (SCAs) with one or both of the applicants. (We were remunerated for the work in Somerville and Winthrop, but not in the case of our work in Chelsea.)

MAPC seeks to inform the MGC's overall decision-making process by providing information and analysis in three ways:

- 1) assessing land use and transportation impacts of the two proposed developments;
- 2) assessing whether the proposals and community agreements thus far achieved will adequately mitigate those impacts; and, finally,
- 3) indicating whether the projects will interfere with existing development or preservation plans already adopted by the Host or Surrounding Communities.

Wynn MA LLC (Wynn) is proposing the construction of a resort casino in Everett, which will comprise approximately 1.4 million square feet of gross floor area, excluding structured parking. The project includes a 504-room hotel and a gaming facility with 4,160 gaming positions. Other features include retail space, eight restaurants, a nightclub, convention and meeting space, a spa and gym, as well as an atrium garden. The project is located on approximately 33.9 acres on Horizon Way off Lower Broadway (Route 99) 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 Orange Line stations, Sullivan Square and Wellington, and a number of bus routes. The proposed Wynn site is currently a blighted and environmentally contaminated waterfront brownfield that has sat dormant for many years. The proponent will assume

responsibility for the brownfield cleanup, which will be completed before project occupancy and require remediation of contaminated soil.

Mohegan Sun MA LLC (Mohegan Sun) is proposing a resort casino that will include 5,000 gaming positions, 450-550 rooms in two hotels, meeting/entertainment space, restaurants, a spa, and retail on a 39.7 acre site. The project site is located off Route 1A and Winthrop Avenue in Revere, and is immediately adjacent to the MBTA's Blue Line Beachmont Station as well as the Suffolk Downs Racetrack. In total, the project will comprise approximately 965,000 square feet of gross floor area, excluding structured parking. Suffolk Downs Racetrack's horse stable barns currently occupy the majority of the land proposed for the Mohegan Sun development. These horse barns will be removed as part of site preparation. In a separate project, a new stabling area is proposed on the Boston portion of the Suffolk Downs property.

From a land use perspective, many aspects of the two proposals are comparable. The scale of the facilities, number of employees, gaming positions, hotel rooms, and parking spaces are within similar orders of magnitude. Both proponents are proposing to undertake significant on-site and off-site infrastructure and transportation improvements in order to mitigate the impacts of the proposed developments. While the two projects are sited within future storm surge zones, both address this issue by placing non-critical facilities on the lower levels of the development.

While there are many similarities between the two projects, there are some significant differences. This memorandum highlights the differences between these two proposals and encourages the MGC to consider seriously both land use and transportation impacts when determining which site (if either) will be granted the Category 1 Gaming License for Region A (Eastern Massachusetts).

MAPC includes in this analysis our opinion on whether the proponent will adequately mitigate the negative impacts of the development. It is one thing if a development generates negative impacts that largely will be mitigated by actions of the proponent; it is quite another if these negative impacts will not (or, in some cases, cannot) be mitigated. MAPC's purpose in laying out impacts that are mitigated insufficiently (or not mitigated at all) is two-fold:

- 1) to encourage the MGC to place conditions on the approval of the selected gaming facility requiring the proponent to improve or expand mitigation in specific and effective ways, and
- 2) to indicate issues that the MGC must be ready to address through the Community Mitigation Fund (CMF) once the selected casino opens.

We wish to emphasize that land use and transportation impacts are not minor and ancillary issues in approving a major development proposal; rather, they 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.

Furthermore, while it is common to suppose that mitigation can be left to the MEPA process, we emphasize that many categories of impact fall beyond the range of impacts covered under the MEPA statute (housing, public safety, and gambling addiction, to name only a few). Therefore, the responsibility for mitigation in regard to such impacts falls to the MGC.

We respectfully suggest that these impacts – especially negative impacts which might be insufficiently mitigated – should play a critical role in your deliberations.

What are the major transportation and land use impacts of the casino proposals?

Impact #1: Traffic congestion. Advantage: Mohegan Sun

The transportation network will shoulder the greatest impact of the proposed casinos. Acknowledging that the casino developments will increase roadway congestion, both projects have outlined steps to improve the roadway network, to reduce the number of single-occupant vehicles (SOV), to establish better transit connections, to provide private shuttle buses for patrons and employees, and to enhance water, bicycle, and pedestrian access to the sites.

The proposed casinos are at different stages in the MEPA process. However, in both cases the Secretary of Energy and Environmental Affairs has issued Certificates that contain detailed reviews and scopes outlining specific roadway improvements that must be designed and constructed by the proponents, as well as specific roadway projects to which the proponents must contribute design funds. Since the Wynn proposal is more advanced in the MEPA process, specific improvements and design-fund obligations are proposed in the recently-issued Final Environmental Impact Report (FEIR). While the improvements related to the Mohegan Sun proposal have yet to be finalized, additional details are presented in the recently-released Supplemental Draft Environmental Impact Report (SDEIR); in particular, the proponent is working closely with the Massachusetts Department of Transportation (MassDOT) on a design for improving the Route 1A and Boardman Street intersection.

From MAPC's perspective, congestion at the Exit 28 ramp on I-93 and congestion through Sullivan Square are the biggest concerns in terms of traffic impacts for the Wynn site. I-93, a major interstate highway, serves as the main access point in and out of Boston from the north, and also serves the Sullivan Square area, and major economic development sites in Somerville (Inner Belt and Assembly Square). Sixty-three percent of all automotive trips by patrons are projected to access the site via Sullivan Square. Much of the proponent's proposed traffic mitigation focuses on Route 16 (Santilli Circle, Wellington Circle, and Sweetser Circle), a critical corridor that provides regional and local connections. The proponent also proposes to make changes to Route 99. While the proponent does propose to reconstruct Cambridge Street between its intersection with Ramp C-L and its intersection with Sullivan Square/Maffa Way, we have serious concerns regarding the overall mitigation program for Sullivan Square and Rutherford Avenue.

Boston has developed a long-term vision for Sullivan Square in which both residential and commercial density will be increased, the Square will become more friendly to bicyclists and pedestrians, the area will be more walkable, and the intensity of connections with the Sullivan Square MBTA station will be increased and improved. This vision assumes a reduction in auto capacity on Rutherford Avenue, freeing up land for bike paths and green space. This urban land use vision was developed over several years through a comprehensive community-based planning process, in part funded by MAPC through the Sustainable Communities Regional Planning Grant awarded by the US Department of Housing and Urban Development.

Boston's vision for Sullivan Square – which is highly consistent with the regional plan, *MetroFuture*, and which will generate numerous benefits for Boston, Everett, and Somerville, will likely be compromised by the increase in vehicular traffic associated with the Wynn casino. The plans presented to date do not adequately mitigate these negative impacts, and MAPC considers it unlikely that any reasonable mitigation package could provide an adequate solution to this problem. We urge the MGC to consider the impacts on Sullivan Square very seriously in deliberating on the Wynn casino location.

To a lesser degree, similar impacts will affect the Assembly Row and Inner Belt development sites in Somerville. The Assembly Row development is well underway and the Inner Belt development is in the planning stages. Significant federal and state investments have already been made to support and enable these developments to come to fruition. These new investments include a new Orange Line station and the planned extension of the Green Line to Route 16.

For the Mohegan Sun site, a serious concern is whether congestion could back up into the Ted Williams Tunnel. If this occurs, there would be significant delays to access Logan Airport and for regional vehicular movements headed north of Boston. The SDEIR recognizes that the Tunnel currently experiences congestion during the PM peak period. At MassDOT's request, the proponent has proposed suggestions to improve tunnel performance. One proposal is to change the pavement marking plan within the section outside of the Tunnel (the Connector "Boat Section"), effectively extending the South Boston on-ramp lane. It is important that the proponent continue to work with MassDOT and the City of Boston to implement a mitigation program that will alleviate traffic entering the Ted Williams Tunnel. MAPC is concerned that the developer's SCA with the City of Boston does not outline any funded mitigation commitments related to traffic and delays at the Ted Williams Tunnel. Mohegan Sun's SDEIR also does not outline funding mitigation commitments to manage traffic at this location.

With almost 70 percent of vehicle trips projected to approach Mohegan Sun through the already congested and inefficient Boardman Street intersection, it is critical that roadway improvements be made to this section of Route 1A. This has been a focal point of the proponent, who has made commitments to improve Route 1A in their Host Community Agreement (HCA) with the City of Revere and in certain SCAs. Ongoing discussions with MassDOT are taking place to select one of two roadway improvement options – a flyover solution (Option 8N) or an at-grade solution (Option 11).

Impact #2: Public transportation. Advantage: Mohegan Sun

While both projects outline extensive public transportation programs as a means to lower SOV travel to the proposed development locations and intend to provide shuttle access to the MBTA for both employees and patrons, public transit access to the site is more advantageous for the proposed Mohegan Sun location.

Both projects outline extensive public transportation programs, forecast similar mode shares for public transit (bus and subway) access (an estimated 10% for patrons and 30% for employees), and have MBTA bus stops nearby. The Mohegan Sun proposal has the advantage of direct proximity to the Blue Line's Beachmont Station, which is immediately adjacent to the site. By contrast, users of the Orange Line will need to transfer to shuttles provided by the proponent at Wellington and Malden Stations in order to reach the site itself, most likely increasing travel times, and making the projected mode shares more difficult to attain.

Impact #3: Proponent Funded Private Shuttles. Advantage: Wynn

Both projects will dedicate most on-site parking to patrons, requiring most employees to access the casino sites by public transportation or shuttle services provided by the proponent. While both casino developments have presented shuttle programs for employees and patrons, the Wynn proposal is significantly more advanced.

Wynn's shuttle program proposes a comprehensive network of shuttle routes to serve patrons and employees while discouraging automobile use. Specifically, Wynn outlines four different types of shuttle services that will all run for extended periods of time and have frequent headways. The four

shuttle services are: Patron Orange Line Shuttle Service, Employee Shuttle Buses, Premium Park & Ride, and a Neighborhood Shuttle. As mentioned in the FEIR, the proponent commits to allocate over \$7 million annually to operate the four shuttles. Moreover, Wynn plans to designate spaces for employee parking at existing parking facilities in Medford and Malden, which is outlined in the SCAs. Wynn has also indicated that developing lease agreements for both locations is well underway. Designating off-site employee parking is also planned in Everett but details still need to be finalized.

To minimize automobile trips to the Mohegan Sun site, the proponent discusses a High Occupancy Vehicle (HOV) Shuttle Plan which will intercept employees commuting to the casino at key regional locations and transit hubs, such as commuter rail stations or park-and-ride locations, and at other yet-to-be-identified geographically dispersed satellite locations. Mohegan Sun acknowledges in their SDEIR that the HOV Shuttle Plan is still being developed.

In addition to and separate from the HOV Shuttle Plan, Mohegan Sun proposes a flexible shuttle system. Three separate routes have been preliminarily selected to comprise the flexible shuttle system: Maverick Square, Back Bay, and the Seaport/Theater Districts. Both the HOV Shuttle Plan and the flexible shuttle system will be implemented and operated by a third-party contractor. To ensure that the contractors select “interceptor” locations and schedule line runs effectively and seamlessly, the contracts will be performance-based.

Mohegan Sun’s SDEIR also briefly mentions plans for a ground shuttle to and from Logan Airport. It is important to note that the SDEIR does not specify monetary commitments for any of these shuttle services in the SDEIR’s Proposed Section 61 Findings and Mitigation Section.

Wynn proposes a robust water shuttle service. Specifically, the proponent plans to design and construct a water taxi/shuttle dock that will be available as a new stop for water transportation routes and will be located at the project site. The proponent proposes a water shuttle service with 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. Custom boats will be built by the proponent to ensure that they can pass under the Alford Street Bridge without requiring it to open. The Wynn FEIR forecasts that 6% of patrons and 3% of employees will initially use water transportation services to access the site. Even though there is no water transportation dock (existing or feasible) in proximity of the Mohegan Sun site, the proponent does outline some commitments to advance water transportation as an alternative mode.

Mohegan Sun supports the City of Boston’s vision to enhance water transportation options to East Boston by instituting regular water shuttle service between the South Boston and East Boston (at Maverick Square) waterfronts. Mohegan Sun also plans to run a patron HOV shuttle between Maverick Square and the project site. The proponent will also support the Town of Winthrop’s water shuttle transportation program and indicates that they will work with DCR to improve linkages between the Revere Beach Reservation and the Boston Harbor Islands.

Impact #4: Transportation Monitoring and Reporting. Advantage: Wynn

The Wynn FEIR outlines an extensive and thorough post-development transportation monitoring and reporting program. The proponent has committed to conducting regular monitoring and reporting of transportation mode shares and adjusting the project’s alternative transportation services and transportation demand management (TDM) programs as necessary. Completed at the proponent’s expense for a period of five years after full occupancy, the monitoring and reporting program will include annual data collection of traffic counts, parking, public transportation, and travel modes. The proponent indicates that the reporting structure will assist in measuring achievement of the project’s

mode share goals, which are that no more than 71% of patrons and 41% of employees arrive by automobile. The proponent also proposes that corrective measures will be undertaken by the proponent if the monitoring indicates there are operational deficiencies and if either of the following conditions apply: 1) traffic volumes for the project exceed 110% of the projected values or 2) the distribution of project-related traffic from the project site entrance to the roadway network varies by more than 10% of the trip assignment assumed for the project.

On the other hand, Mohegan Sun's monitoring and reporting program is less advanced. While the SDEIR mentions conducting transportation monitoring and issuing an annual report, no details are provided. The SDEIR does state that TDM commitments, including specific elements of a traffic and transportation monitoring program, will be developed in collaboration with MassDOT and committed to in the Section 61 findings. The proponent also acknowledges that employee and patron mode share will be evaluated and monitoring of assumptions and effectiveness of TDM strategies will be discussed with MassDOT.

Impact #5: Economic and Community Benefits. Advantage: Mohegan Sun

Both casino proponents outline a series of measures that are meant to mitigate potential negative economic impacts caused by the gaming facilities, and to provide an array of community benefits. Such commitments can be important in a number of ways, but especially to off-set some of the potential adverse impacts of the gaming facilities on the economy of Host and Surrounding Communities.

Local Business Expenditures

Each proponent has pledged to purchase goods and services from local businesses. However, these commitments are somewhat vague for a variety of reasons. First of all, in regard to Mohegan Sun, it is not possible, with certainty, to sum the amounts pledged, because we do not know if local commitments are *part of or in addition to* regional commitments. Wynn has also included \$15 million in local business expenditures as part of its Best and Final Offer (BAFO) to Boston, but this Offer awaits action by the MGC to establish the terms of an agreement between Wynn and Boston. Finally, all of the commitments (for both proposals) pledge to use best efforts to expend funds within these communities; they are not formal firm commitments.

Nevertheless, if one sums the local (not regional) expenditures committed to each community in the HCAs and SCAs, along with Wynn's separate written commitment to purchase \$10 million from vendors located in Everett, and Wynn's BAFO commitment to Boston, then the totals appear to be on the same order of magnitude, at \$62.5 million for Mohegan Sun and \$57.5 million for Wynn.

MAPC therefore suggests that, first of all, the MGC should ascertain the exact amount of the commitments by resolving the issues described above. Secondly, in its approval of the gaming license, the MGC should add conditions that would require the tracking and reporting of these expenditure commitments, and a means for the MGC to take action if the goals are not being met. Finally, MAPC also suggests that the MGC may wish to consider whether the gaming license approval should include any language to ensure that these pledges for local purchasing would include not only the proponent, but also any partners or subsidiaries that might be involved in meeting these commitments.

Local and Minority Hiring

Of the two proponents, Mohegan Sun is more specific on local hiring preference as well as its commitment to market to and hire minority, women-owned and veteran-owned businesses, stating percentages for hiring from Revere and Chelsea for construction jobs as well as ensuring that 25% of

the construction jobs will go to minorities and 10% will go to women. Mohegan Sun also ensures that specific percentages of permanent jobs will be filled by residents of Revere, Chelsea, and the 15-mile region around Revere City Hall. Wynn provides a hierarchy of preference for hiring local workers and states it will use union labor for construction and will make an effort to utilize Minority Business Enterprises and Women Business Enterprises. MAPC is aware that a draft diversity plan has recently been developed by Wynn and we hope that it is finalized soon.

Workforce Development

Both proponents make various references to job training and local economic development. Wynn's agreements reference coordination with local Chambers of Commerce to help get the word out about job and vendor fairs. In its agreement with Cambridge, Wynn included a commitment to coordinate with the Cambridge Office of Tourism and Cambridge Local First. It also included a commitment to work with Cambridge Rindge and Latin School's culinary program. Wynn's commitments under the SCAs also included allocations for business development programs.

Mohegan Sun's agreements indicate a commitment to workforce development by referencing job readiness programs in Chelsea and Somerville. They also commit to supporting economic development by contributing to Winthrop's Business Improvement District. Most significantly, Boston's SCA with Mohegan Sun indicates that the Community Impact Fees can be spent on such issues as education partnerships with local community colleges, hospitality and other job training, projects of the Mayor's Office of Art and Tourism (especially for programs in East Boston), and other small and local business assistance. This SCA also designates funds from the up-front \$30 million Community Capital Projects Fee to be used to support local businesses through the East Boston Neighborhood Business Association.

Ancillary Development

A key question in analyzing the economic benefits of a development is the ancillary development it might help to spur, and the jobs and tax revenue that might be generated by that ancillary growth. As identified in a review of literature, ancillary commercial development around resort casinos is typically limited due to the business model/design of these developments, which typically provide a complete consumer experience with gaming, shopping, dining and lodging all incorporated within an enclosed space. However, according to the literature, some communities did experience ancillary hotel and convenience retail development, mostly along access routes to the facilities. Although both the Wynn and Mohegan Sun proposals offer some opportunities for ancillary redevelopment adjacent to the facilities, the Mohegan Sun proposal appears to have an advantage given its immediate access to public transit.

Should ancillary development occur in the vicinity of the Mohegan Sun proposal, customers could avoid potential roadway congestion via direct transit service to and from the casino facility, Logan Airport, the City of Boston, and Revere Beach. Additionally, while land directly adjacent to the Mohegan Sun project, both in Revere and Boston, presents an opportunity for ancillary development, additional opportunities are also found along nearby Revere Beach. As highlighted earlier, ongoing planning by the City of Revere has identified numerous sites for potential development, including retail and hotel development less than one mile (and one or two Blue Line stops away) from the proposed casino, including at Southern Revere Beach and the former Wonderland Race Track. The Mohegan Sun development could serve as a catalyst for redevelopment of these areas.

For the Wynn development, although access concerns including congestion and lack of direct public transit would not preclude additional development adjacent or proximate to the Wynn site, it could alter the type of opportunities in Everett, and potentially limit opportunities in neighboring Boston. While the Wynn project is generally consistent with the City of Everett's vision for a mixed-use Lower

Broadway Corridor, it would likely change the opportunities in areas directly adjacent to the site (e.g., more hotels, less neighborhood-serving retail or employment). However, as highlighted earlier in this memorandum, Boston's vision for nearby Sullivan Square as a more walkable, bicycle-friendly, better connected area with increased residential and commercial densities would likely be compromised due to increased traffic and congestion, thus diminishing the economic potential of the area.

Community Benefits

Mohegan Sun has negotiated roughly twice as many agreements as Wynn, and the total amount of annual payments to the communities under these agreements is significantly higher for Mohegan Sun (approximately \$50 million) versus Wynn (approximately \$31 million), even including Wynn's BAFO to Boston. On the other hand, while all of the HCAs and SCAs tend to assign money to broad categories of activities, Wynn's agreements tend to have more specificity than those of Mohegan Sun. Generally speaking, MAPC believes that many of the payments in these agreements – whether they are made to the municipalities or other entities – will have a positive economic benefit, either direct or indirect, on the Host and Surrounding Communities.

Impact #6: Environmental impacts. Advantage: Wynn

From an environmental perspective, Wynn's proposed design scenario would have significant environmental benefits. The first is the redevelopment of a brownfield site, which in its current state, is an impediment to any redevelopment and negatively impacts the Mystic River's water quality due to environmental toxins and pollutants. The regional importance of eliminating this major brownfield site should not be underestimated, especially because it has remained undeveloped for so many years. Any future developer would need to devote major resources to the clean-up, or to depend at least in part upon government subsidy.

Redevelopment of the Wynn site also has the beneficial result of constructing required public access on the Chapter 91 tidelands: a trail will connect with other existing and proposed trail segments to produce a continuous network along the lower Mystic, bringing a significant resource (the river) to an urban population that has a lack of existing parks and open space and access to natural resources. The proposed establishment of an oyster reef in the Mystic River as part of the Wynn proposal would, if successfully established, also benefit water quality. Proposing to establish private dockage and providing a direct water shuttle service to the casino will further activate both the waterfront and river and help to improve the image of the Mystic River as more of a community asset.

While the Wynn project is located outside the 100-year floodplain, Mohegan Sun proposes to construct its facility within the 100 year flood plain and proximate to Sales Creek and Rumney Marsh, areas which include a portion of the Rumney Marshes Area of Critical Environmental Concern (ACEC). The Mohegan Sun project plans to provide compensatory flood storage in accordance with the Wetlands Protection Act regulations to offset and mitigate work in the 100-year floodplain. Furthermore, the Mohegan Sun project fully complies with the applicable Wetlands Protection Act performance standards relative to construction work in an ACEC.

Impact #7: Bicycle and pedestrian infrastructure. Advantage: Both proposals equally advantageous

MAPC is a consistent promoter of alternative modes of transportation, including bicycle and pedestrian facilities, as a means of lessening dependence upon SOV. MAPC is pleased that both proposals incorporate significant, and comparable, improvements to bicycle and pedestrian facilities in and around their proposed gaming facilities. The roadway improvements proposed by both proponents include changes that will accommodate pedestrians and bicyclists. In general these

changes include improvements to crosswalks, signal timings, bicycle lanes, and the installation of medians along key roadways and at critical intersections and rotaries.

Mohegan Sun plans to provide on-street bicycle accommodations to connect Constitution Beach, Belle Isle Marsh, and Revere Beach along the Bennington Street corridor. Wynn plans to provide a bicycle and pedestrian path along the waterfront, connecting the project site to existing trails in DCR's Gateway Park, which is located on the west side of the commuter rail tracks. The Wynn project's harborwalk will also connect to the proponent's planned pedestrian and bicycle facilities along Broadway (Route 99). If determined to be feasible, MAPC is pleased that Wynn intends to provide one Hubway bicycle sharing station on-site and Mohegan Sun has committed to provide accommodations for two.

Impact #8: MBTA Maintenance Facility. (This is a concern regarding the Wynn proposal, and not a comparable matter.)

The MBTA's Bus Maintenance Facility adjacent to the Wynn site is an essential back shop for MBTA services and operations. The MEPA Certificate points out the importance of the Maintenance Facility, which is also acknowledged in the proponent's FEIR. The FEIR outlines two proposed vehicular access plans – a Primary Site Access Plan and an Alternate Site Access Plan. The Primary Site Access Plan will necessitate vehicular access changes, land acquisition, and other infrastructure improvements at the Maintenance Facility that will need to be coordinated with the MBTA. The Alternate Site Access Plan would locate the project's driveway along the existing Horizon Way and would require minor modifications to the MBTA Maintenance Facility's access. The FEIR has indicated that discussions among the proponent, the MBTA, MassDOT, and the City of Everett regarding the design of a final Site Access Plan are ongoing. Regardless of which Site Access Plan is selected, it is imperative that the MBTA Maintenance Facility remain accessible and available at all times for MBTA use and that truck and shuttle bus connections to the project site be mitigated and not hinder area MBTA bus service and vehicular access.

What impacts are left unmitigated or inadequately mitigated, and might therefore cause a future request to the Community Mitigation Fund?

Both proponents, of course, have reached HCAs with their Host Communities. Mohegan Sun has reached accord on 12 SCAs, all of which were achieved voluntarily between the municipalities and the proponent. Wynn has executed 5 SCAs, two of which required arbitration. Collectively, these agreements reflect the proponents' efforts to address impacts of their facilities on nearby communities. (At this time, Wynn has put forward a BAFO for an SCA with Boston, but Boston is opting to allow the MGC to determine a community impact arrangement outside of the formal arbitration process.)

While we are pleased that so many communities have entered into HCAs and SCAs, the reality is that the agreements themselves frequently lack specificity in regard to mitigating individual impacts. Most of the agreements focus on payments to municipalities or third parties, without clearly explaining how and when these funds will be used, and whether they are even tied to the mitigation of negative impacts. This lack of specificity is especially problematic in regard to impacts that may occur over a long period of time and are not amenable to a "one shot" solution at the point of development, and in regard to unidentified impacts, which may crop up during development or further down the road.

This section of MAPC's memorandum provides information on areas where the HCAs and SCAs are lacking in providing for appropriate mitigation. We encourage the MGC to examine the agreements and to add more specific conditions to the Category 1 Gaming License, to ensure that the best provisions are implemented for all communities, and/or to otherwise be ready to utilize the Community Mitigation Fund (CMF) to address non-mitigated impacts. Since Mohegan Sun has reached agreements with more communities, more communities will be at the table when and if disbursements from the CMF are discussed for impacts that were either unanticipated or inadequately mitigated.

Public Safety and Gambling

A few of the agreements address public safety (police, fire, EMS) issues specifically (e.g., Revere HCA, Winthrop SCA). The Boston SCA with Mohegan Sun also specifies that the one of the potential uses for the \$18 million annual Community Impact Fee is public safety, including a long list of potential uses for the Police Department, Fire Department and Emergency Medical Services. Most agreements, however, do not address public safety in any significant way.

Similarly, although there is a separate fund to address problem gambling established by statute, most of the agreements did not provide significant specificity on this issue. One exception was Chelsea's agreement with Mohegan Sun, which included reference to services that would be tailored to the cultural and geographic needs of the city, including the provision of services in Spanish.

Another exception was the Boston SCA with Mohegan Sun, which included construction of a new Addiction Resource Center in East Boston, as well as funding to supplement existing anti-addiction programs, as potential uses for the \$18 million annual Community Impact Fee. Boston's SCA also includes a series of actions that the proponent will undertake to address the issue of problem gambling. Wynn's SCA with Cambridge also references access to responsible gambling resources for Cambridge residents. Mohegan Sun's SCA with Somerville addresses Somerville's casino development concerns by agreeing that no shuttle stops and mass mailings from the casino would occur in Somerville. However, as with public safety, most of the remaining agreements do not address compulsive gambling in any significant way.

The MGC should not allow these significant gaps to stand. Either through conditions placed on the approval of the License, or through the CMF (or through both mechanisms), the MGC should require the successful proponent to address public safety and gambling addiction concerns through specific mitigation measures, backed up by actual monetary commitments, in both Host and Surrounding Communities.

Housing

MAPC notes that only two of the SCAs address in any significant manner the issue of impacts to the availability of housing, including housing affordable to casino employees. The development of major facilities such as casinos, along with ancillary development that the casinos are likely to spur, will have an overall inflationary impact on the rents and sales prices in the Host and Surrounding Communities.

We recognize that in many parts of the country, increased sales prices and rents are seen as a positive, especially in depressed markets where many casinos are located. However, in Eastern Massachusetts, housing prices are already inflated, and major developments almost always contribute to further price escalation, which causes low and moderate income renters to lose their

apartments, and makes it virtually impossible for low and moderate income homebuyers to purchase a home in these communities.

It is essential that the successful casino licensee contribute a reasonable amount of funds to help preserve existing affordable housing and/or spur the development of additional deed-restricted affordable housing in the Host and Surrounding Communities.

Without such efforts at preservation and increased production, housing costs will continue to rise and displacement of working families will accelerate. This is an economic and social impact factor as great as any other being addressed by the MGC. The casino proponents have made only very limited commitments to assist in the preservation or creation of affordable housing for existing or future residents of the communities, or even for casino employees. One example is the commitment in the Winthrop SCA for Mohegan Sun to provide \$100,000 annually to Community Action Programs Inner City (CAPIC) for social services programs. Although CAPIC is primarily a housing support organization, job readiness programs are specifically cited in the commitment, so it is unclear whether any of these funds will assist in the housing arena. In any event, the amount committed is very small.

The other effort to address affordable housing is found in the Boston SCA with Mohegan Sun, which sets aside \$500,000 annually for a Housing Fund to provide \$10,000 grants (repayable upon future sale of the house) to East Boston residents for purchase of their first home in East Boston.

There are numerous other ways in which the successful casino licensee could help to assist in the preservation or creation of affordable housing. MAPC would be glad to discuss these mechanisms with the MGC, and we hope the Commission will stand ready to ensure that this critical issue is addressed.

Public Transportation

MAPC believes strongly that transportation impact mitigation should not be limited solely to roadways. Each casino proposal has a public transportation component as part of their site design, which will result in increased demand on MBTA service. While the proponents have conducted analyses that indicate MBTA service will not significantly exceed capacity, that is hardly an assurance of optimal performance. MAPC believes these services will be strained by the substantial addition of new passengers, especially at peak times. To off-set this impact, each 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.

Since such a partnership is not apparent in existing commitments, the MGC should use its influence to assure such a commitment on the part of the successful licensee.

Roadway Improvements

In the case of roadway improvements, Wynn intends to contribute some funds for study, design and construction of Wellington Circle, Santilli Circle, Sweetser Circle, Bell Circle, I-93 Exit 28 off-ramp, and to contribute to the study of the Sullivan Square design. However, additional funds are needed for final design and construction at each of these locations. Although the need for these improvements is not entirely related to the casino development, the need is increased due to the casino, and some additional portion of the cost should be borne by the proponent.

In the case of the roadway improvements associated with the Mohegan Sun proposal, the specifics are less defined at this time as the proponent is still working with MassDOT to refine the preferred

alternative for the Route 1A improvements. Therefore, we do not yet know the degree to which the proponent will contribute to design or build the improvements. Mohegan Sun traffic will also impact Route 16 and Route 60, and therefore the proponent has committed to making improvements intended both to off-set project-generated impacts and to address longstanding regional traffic problems at locations which include, but are not limited to the Route 1/Route 16 interchange, Revere Beach Parkway (Route 16/Route 145), Donnelly Square, Bell Circle, and Copeland Circle. Mohegan Sun will not fund the construction of all these intersections, so as with Wynn, the need for additional public funds to address these concerns will be increased due to the casino development.

While Mohegan Sun proposes to mitigate increased traffic on Bell (Mahoney) Circle by improving traffic flow, this goal and the current configuration do not address the need for pedestrian and bicycle improvements. Residents are able to use buses to reach Broadway and nearby destinations, and the MBTA Blue Line provides service to the larger metro area. For closer destinations, however, many take perilous shortcuts across Bell Circle, including middle and high school students on a daily basis. In the long term, the redesign of Bell Circle should balance pedestrian, transit, bicycle, and automobile improvements, along the lines of a “Complete Streets” approach, where all users have equal access and status within an intersection or along a corridor.

Since the Wynn site has less advantageous direct transit access, Wynn should also include improvements to facilities for 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. The Route 99 corridor also provides a significant amount of bus service. 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 Wynn does propose to widen the roadway to add more auto capacity and enhance bus stops near the project site, additional roadway design changes 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.

What might happen to the each of the sites if the site is not selected for a casino development?

The Wynn site is zoned for future mixed-use development, but the high cost of remediation to the brownfield site would mean one of three things would likely occur: the site would either remain vacant for a significant length of time due to remediation costs, or significant public investment could be made to clean up the site so that it could be brought back into productive use (and thereby generate more local tax revenues), or the site would need to be very densely developed in order to yield enough return to pay for the private investment in the cleanup of the site. In the first case, none of the environmental benefits of the redevelopment of the site (e.g., publicly accessible space along the river’s edge, re-activation of the water surface for recreational and transportation uses) would occur; in the latter two cases some of the items are required (public access along the filled tidelands) but others currently proposed (dockage, water shuttle, and oyster reef establishment) would not necessarily be incorporated into future designs for the site.

The Mohegan Sun site, as well as the remainder of Suffolk Downs (which may not stay in operation if the casino is not located there), is a very large site with significant redevelopment potential. Even though portions of the site are within flood and storm surge zones and other portions of the site are wetlands and buffers, the majority of the site is already impervious and available for potential redevelopment. The location immediately adjacent to two Blue Line stations makes this site a potential suitable location for future commercial or mixed-use development.

In both cases, the impacts of the future alternative development would be mitigated through the MEPA process, but additional benefits to the Host and Surrounding Communities as required under the Expanded Gaming Act might not be provided. The Host Community is more likely to seek more robust mitigation and benefits through a community benefits agreement with the proponent, but the Surrounding Communities are unlikely to receive many benefits.

What are the likely impacts on other plans that have been adopted by the Host or Surrounding Communities?

Wynn

After a four-year planning process with significant public input, the City of Boston has adopted a transportation and redevelopment vision for the Sullivan Square/Rutherford Avenue part of Charlestown which 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 is for an area with less auto traffic and more walking, biking, and transit use. These plans 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*, and MassDOT’s mode-shift goals and GreenDOT programs.

Unfortunately, the traffic impacts projected for the Wynn site would seriously damage this vision for Sullivan Square and Rutherford Avenue, because the vast majority of traffic to and from the site will utilize this corridor. To date, a comprehensive mitigation program has not been determined, and it is not clear that such mitigation is even practical. MAPC does acknowledge that Wynn’s 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 \$5 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.

Typically, traffic mitigation takes the form of creating more capacity by widening intersections, roadways, or improving signal timing. But the City of Boston’s plan for the Sullivan Square area is to *decrease* auto capacity in order to facilitate mixed-use development around an existing transit station. Signal timing alone will not address the congestion. The additional traffic generated by the Wynn site and the vision for Sullivan Square are at odds with each other, a contradiction that no reasonable traffic mitigation package can resolve. Therefore, it is highly likely that development of the casino at the Wynn site will preclude the redevelopment plans for Sullivan Square, as well as the quality of life improvements (safer walking and biking along a landscaped greenway) that would come from the redesigned Rutherford Avenue.

One interesting question is whether these problems could be solved by rebuilding the Rutherford Avenue underpass instead of creating a 4-lane surface street. Our assessment is that they could not. First of all, a new underpass would have to be built from scratch; rebuilding the existing underpass is not a viable option. So the expense would be formidable. Secondly, although the

underpass might handle somewhat more traffic than the surface option, the difference would not be significant, and it would certainly not be sufficient to make a meaningful difference in the capacity of the area to handle casino-related traffic.

Furthermore, the underpass would reduce “public realm” improvements in significant ways. The presence of access and egress ramps would reduce available space for the proposed greenway, as well as bicycle and pedestrian infrastructure, harming the objective of encouraging more people to walk and bike in the area. In addition, it would use up some of the land available for residential and commercial development, and several parcels bordering the ramps would become less valuable and more difficult to market.

Beyond the Sullivan Square/Rutherford Avenue area in Boston, the City of Somerville is undergoing significant development in close proximity to the proposed Wynn site. The Somerville side of Sullivan Square will serve as one of the main access points to the new Assembly Square development, which will become one of the state’s largest mixed-use developments, centered on a new Orange Line Station, Assembly Station. Further west of Sullivan Square is Somerville’s Inner Belt, another site for mixed-use Transit Oriented Development (TOD). The congestion generated by the Wynn proposal at the Exit 28 I-93 off-ramp would hinder planned redevelopment of Somerville’s Inner Belt area. Left hand turns off of the I-93 ramps at Exit 28 will be the main auto access to the Inner Belt area. Inner Belt has long been planned by Somerville as a mixed-use site, made possible by the extension of the Green Line. It is important to note that both the new Assembly Station and the Green Line extension represent considerable public investments following extensive planning and review processes, in part to generate mixed-use development that includes homes, jobs, and tax revenue. It would be highly inappropriate for one private development, i.e., the Wynn Casino, to preclude or damage these plans and objectives.

The Commission should give very serious consideration to these largely unmitigated negative impacts on economic development sites that have undergone years of planning and commitment of federal, state, and municipal funds.

Less dramatic impacts on nearby development plans also deserve mention. The use of the perceived “excess parking” at Malden Center and in Medford near Wellington Station as locations for Wynn satellite parking may preclude the future use of those parking resources to support additional future development for housing or mixed-use at these transit-oriented locations.

On the other hand, the Wynn development could have salutary impacts on the Commercial Triangle in Everett (between Route 16 and the Commuter Rail to the east of Santilli Circle), which has been identified as a regionally-significant Priority Development Area in the ongoing MetroNorth Priority Mapping project, which is a joint project of MAPC, the Executive Office of Housing and Economic Development, and the urbanized municipalities north of Boston. Development of this area, which is proposed to include housing near the existing neighborhoods and a mix of office and retail, may benefit from the remediation of the Monsanto/Wynn site and the associated improvements to Broadway and Santilli Circle that are proposed as part of the Wynn casino development. MAPC also recognizes that the Wynn project is consistent with both Everett’s Lower Broadway Master Plan and the recently approved Everett Municipal Harbor Plan.

Mohegan Sun

The Mohegan Sun proposal will have a number of impacts on recent and ongoing planning efforts. The ongoing redevelopment of the Revere Beach area, in particular the Southern Revere Beach district identified as regionally-significant Priority Development Area during the MetroNorth project

(mentioned above), is proposed to include significant retail and hotel space related to, and benefited by, the casino development. Other community-level priorities, such as the Wonderland Station area of Revere, may also benefit from the casino development.

However, a number of real estate projects that are adjacent to Revere Beach are also adjacent to the lowest-income neighborhood in Revere, Shirley Avenue, which has also been the site of recent community planning activity. These projects, coupled with the potential casino, will have impacts on the limited supply of market-rate affordable housing in the neighborhood. Priority issues for the Shirley Avenue neighborhood in relation to the potential casino include: advocating for the redesign of Bell Circle to serve multi-modal transit in a better way, pedestrian and bicyclist needs, as well as cultivating funding for a business support organization for Shirley Avenue that builds local business skills, provides resources, and offers engagement and promotional activities. There is also, as noted elsewhere in this memorandum, the need to preserve and build additional, permanently deed-restricted/subsidized affordable housing in this area to prevent displacement of current residents.

The MGC should make efforts to ensure appropriate support and assistance for these critical efforts in the Shirley Avenue neighborhood, either through conditions on any license to Mohegan Sun and/or through assignment of resources from the CMF.

Conclusion

MAPC encourages the MGC to take into account the transportation, land use, economic, social and other impacts of the proposed casinos, including but not limited to those listed in this memorandum, when making a decision regarding which proposal, if any, will receive the Category 1 Gaming License for Region A. We hope that you will concur that some of these impacts are large enough that their mitigation, beyond what is found in the Host and Surrounding Community Agreements, should be a condition of approval of this Gaming License. We also encourage the MGC to be ready to address the broader range of transportation, land use, housing, economic development and social impacts through disbursements from the CMF.

Thank you for providing the opportunity to share our perspective on one of the most important land-use decisions in Metro Boston in recent years. Should you have any questions or would like additional information, please do not hesitate to contact myself (mdraisen@mapc.org; 617-451-2770) or Mark Racicot, Director of Land Use Planning (mracicot@mapc.org; 617-933-0752).