

MASSACHUSETTS GAMING COMMISSION SURROUNDING COMMUNITY PETITION ANALYSIS



COMMUNITY: City of Cambridge
APPLICANT: Wynn MA, LLC

March 20, 2014

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INTRODUCTION AND OVERVIEW

The Community has submitted to the Commission a petition to be designated as a surrounding community to the Applicant's proposed gaming establishment in accordance with G.L. c. 23K, §§ 4(33) and 17(a) and 205 CMR 125.01(1)(c). The Applicant has submitted a response to the petition.

In making its determination, the Commission must consider the factors in G.L. c. 23K, §§ 4(33) and 17(a) including population, infrastructure, distance from the gaming establishment and political boundaries.

The Commission must review, in accordance with G.L. c. 23K, §§ 4(33) and 17(a) and 205 CMR 125.01(2)(b), the Applicant's entire application; the Applicant's RFA-2 detailed plan of construction; any independent evaluations; any pertinent information received from the Community, the Applicant, the Applicant's host community, and the public; and any additional information that the Commission determined to be beneficial in making its determination.

The Commission's regulations lay out the six criteria that the Commission should consider in making its determination:

1. Proximity
2. Transportation Infrastructure
3. Development
4. Operation
5. Other
6. Positive Impacts

This document lays out the six criteria and provides the legal framework that the Commission must consider, an executive summary of the issues, the Community's petition, the Applicant's response, RPA analysis, ENF analysis, consultant analysis, relevant RFA-2 application question responses, and other relevant materials.

1. PROXIMITY

Legal Framework

Chapter 23K defined surrounding community as a “municipalities in proximity to a host community which the commission determines experience or are likely to experience impacts” In determining whether a community is a surrounding community, the commission . . . will evaluate whether: . . . The community is in proximity to the host community and the gaming establishment included in the RFA-2 Application, taking into account such factors as any shared border between the community and the host community; and the geographic and commuting distance between the community and the host community, between the community and the gaming establishment, and between residential areas in the community and the gaming establishment. 205 CMR 125.01(2)(b)(1)

During the Commission’s deliberation on surrounding communities policies, the Commission rejected establishing a mileage based threshold for determining which communities are surrounding communities. But noted that the legislature had offered amendments on such a mileage based standard (establishing a standard of 2 miles, 3 miles or 5 miles distance from a gaming facility as determination of surrounding community status or the need for a hearing.)¹

Executive Summary

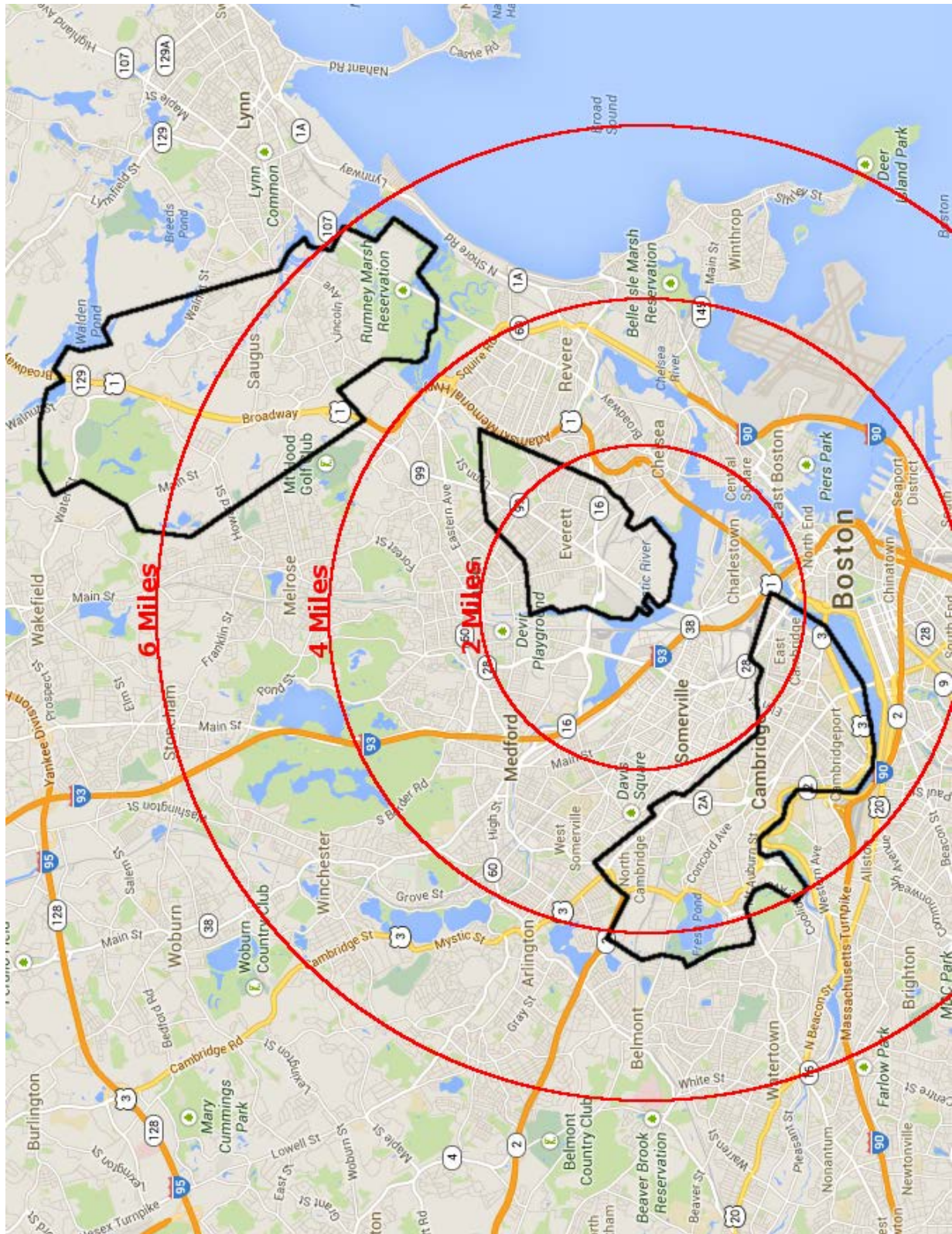
Community Petition

Cambridge is less than five miles away from Everett.

Applicant Response

Table indicates that the length of common border is zero miles, and it is 1.14 miles from the site to the border of Cambridge.

¹¹ See “Surrounding Communities Amendments” document included in December 12, 2012 Commission Meeting Packet.



A. COMMUNITY PETITION

Cambridge is less than five miles away from Everett.

B. APPLICANT RESPONSE

From Wynn’s 1/29/2014 Community Presentation:

Slide: “Overview of Impacts – Proximity Chart”

Table indicates that the length of common border is zero miles, and it is 1.14 miles from the site to the border of Cambridge.

p. 81 of transcript, Mr. Gordon
23 These are the ones that we haven't
24 recognized. And again, it's no disrespect to
p. 82, Mr. Gordon
1 these communities, but we found that in this
2 measure, most of them don't have a common
3 border or are quite a bit further away. And
4 you'll see later on traffic and other stuff
5 that we just didn't see the same level of

6 impact.
7 Another point we wanted to make,
8 this is our site, as you know, in Everett on
9 the river. It's almost completely surrounded
10 by Everett, with the exception of, as you know
11 and we've talked about it before, the finger of
12 Boston land that comes in here. And also,
13 almost everything around it is industrial
14 property.

C. RPA ANALYSIS

No relevant documents

D. DEIR ANALYSIS

No relevant documents

E. CONSULTANT ANALYSIS

Green Analysis

F. APPLICATION

No relevant documents

G. OTHER

No relevant documents

2. INFRASTRUCTURE

Legal Framework

In determining whether a community is a surrounding community, the commission . . . will evaluate whether: . . . The transportation infrastructure in the community will be significantly and adversely affected by the gaming establishment, taking into account such factors as ready access between the community and the gaming establishment; projected changes in level of service at identified intersections; increased volume of trips on local streets; anticipated degradation of infrastructure from additional trips to and from a gaming establishment; adverse impacts on transit ridership and station parking impacts; significant projected vehicle trip generation weekdays and weekends for a 24 hour period; and peak vehicle trips generated on state and federal roadways within the community. 205 CMR 125.01(2)(b)(2)

Executive Summary

Community Petition

[I]mportant transportation corridors for Cambridge, such as Route 16, Land Boulevard, Memorial Drive and the Massachusetts Turnpike will be negatively impacted by traffic to and from the casino.

Transcript

Pg. 64, Ms. Clippinger

10 We basically see that casino as
 11 creating regional traffic and transit
 12 challenges and that we feel they have to be
 13 addressed at a regional level. And that the
 14 impacted region of the surrounding
 communities
 15 should include the city of Cambridge.

16 We believe that the four percent of
 17 trips that were shown to cut through Cambridge
 18 along Washington Street is understated. And
 19 that if those trips end up on Prospect Street,
 20 for us that's a 20 percent increase in traffic.

21 We feel that the traffic congestion
 22 at the heavily congested intersections will
 23 serve to focus additional traffic onto
 24 Washington Street above what was in the study

p. 65, Ms. Clippinger

1 and those coming through Cambridge.

p. 65, Ms. Clippinger

1 ... We also do
 2 not believe that zero percent of trips are
 3 going to cut through Cambridge on the Gilmore
 4 Bridge. Rutherford Ave. congestion and
 5 congestion in the general area is likely to
 6 cause some people to use that route.
 7 And if only 10 percent of the trips
 8 were using the Gilmore, it's an additional 50
 9 or 60 trips into an intersection which is
 10 already heavily congested.

Pg. 65, Ms. Clippinger

11 We also don't believe that all 38
 12 percent of the trips that are expected to use
 13 I-93 coming up from the South will stay on I-
 14 93. We feel some of them are going to want to
 15 avoid the congested central artery in downtown
 16 Boston. And when they make that decision, one
 17 of the options they have is to get off of I-90
 18 or to come through Allston Brighton and cut
 19 through Cambridge, a direct route right up
 20 River, Western and Prospect Street to
 21 Washington Street.

Pg. 67, Ms. Clippinger

10 We see that the future growth of

11 Kendall Square and of the whole region is
 12 greatly enhanced if we can have a really strong
 13 and improved transit connection between
 14 Sullivan Square and Kendall Square through
 15 Lechmere.

Pg. 68, Ms. Clippinger

19 ... I think one of the
 20 ways -- One viable way of trying to improve the
 21 Sullivan to Kendall transit service
 22 availability, capacity is service reliability
 23 and looking at whether there are ways to have
 24 exclusive bus lanes or few jump for buses or

p. 69, Ms. Clippinger

1 lanes for buses. Anything we can do to give

2 them a reliable travel time savings.
 3 There's going to be a huge incentive

Pg. 96, Ms. Clippinger

4 And I have a little trouble figuring
 5 out how a four percent traffic volume from the
 6 site that ends a few blocks short of the
 7 Cambridge border will have zero trips in
 8 Cambridge.

Pg. 97, Ms. Clippinger

8 ... people who don't stay on Memorial
 9 Drive or don't stay on 93 who are cutting
 10 through either First Street or Land Boulevard...

Applicant Response

Wynn Everett Traffic Distribution table indicates zero direct and zero indirect trips in or out of Cambridge. In testimony, by Mr. Gordon, noted that Wynn's "traffic model shows literally no traffic going through Cambridge either to or from the casino. We have a lot of traffic elsewhere, which you saw on the earlier slides, but none of those arrows green, yellow with the numbers on them go through Cambridge. So, our model shows there isn't any impact on Cambridge traffic." In response to concerns regarding the use of Memorial Drive, Ms. Pyle, representing Wynn from Howard Steiner Hudson, stated that: "If a person 18 say were coming from Newton Center and using 19 the turnpike to then use I-93 getting off at 20 Sullivan Square to go the Wynn Everett site, that travel distance wise is actually a couple of miles longer than getting off here in Allston and using Memorial Drive over to Rutherford Avenue and up across the Alfred street Bridge. But time wise, it's actually a minute shorter primarily because of all of the signals that you have to go through on Memorial Drive. The speed is slower. It has 10-foot travel lanes, sometimes nine-foot travel lanes. So, you can't travel even though the speed limit on the turnpike is 45, you can't travel at 60 miles an hour. And then I did that at rush last night. So, even with rush-hour traffic, it was actually three minutes faster in rush- hour to say on the regional highways to get to our site if you're coming via the turnpike. So, we don't necessarily think that folks are going to be induced to go through Cambridge and sit at all of those red lights as they weave their way through Cambridge and/or Somerville.

Mr. Gordon noted: "As you remember from our filing, our peak is at 9:00 at night. So, we wouldn't envision impacting many commuters in the system wide because most of our peak is quite different from the commuting people.

RPA Analysis

[MAPC did not mention any Cambridge roadways in its analysis as part of its DEIR comments.]

DEIR Analysis

DEIR Certificate

The DEIR identified the project's impacts on traffic and identified measures to avoid, minimize and mitigate traffic impacts. Comments from MassDOT indicate that the traffic study generally conforms to the EEA/MassDOT Guidelines and indicates that the proposed mitigation and TDM commitments demonstrate a reasonable approach to addressing the project's impacts. The MassDOT letter identifies significant additional analysis and consultation that should be completed prior to the filing of the FEIR. Comments from DCR, MAPC, the City of Everett, adjacent municipalities and others identify significant issues associated with the development and analysis of traffic mitigation, mitigation of impacts to the MBTA facility and transit service.

...

Given the urban context of the project, a commitment to an effective TDM program, and the ability to hold the Proponent accountable for achieving trip reduction strategies through monitoring and reporting, MassDOT has determined that the trip generation calculations are reasonable.

Study Area

The study area was revised and expanded based on consultation with MassDOT, DCR and other commentors. It includes the following intersections:

57. Monsignor O'Brien Highway (Rt28)/Edwin H. Land Boulevard/Charlestown Avenue, Cambridge.

...

The existing conditions analysis indicates that a number of intersections within the study area are operating at Level of Service (LOS) D or worse, with excessive delay. The SYNCHRO analysis results also indicate that, in most cases, queues at these intersections would extend beyond available queue storage space. The Proponent must demonstrate in the FEIR that the proposed mitigation program will address safety issues, and at a minimum, not degrade existing operations. The FEIR should provide volume to capacity ratios and a summary table of the 50th and 95th percentile queues and graphics to allow comparison of projected queues relative to available queue storage space. Because several intersections are designated as crash clusters, MassDOT will require Road Safety Audits (RSA) to assess safety issues and develop mitigation measures for these locations.

MassDOT – DEIR Comment Letter

The existing conditions analysis indicates that a number of intersections, [including the intersection of Monsignor O’Brien Highway (Route 28) at the Edwin H. Land Boulevard in Cambridge], within the study area are operating at Level of Service (LOS) D or worse, with excessive delay.

While these congested conditions are not uncommon in an urban area, it is imperative for the proponent to ensure that the proposed mitigation program would address some of the safety conditions, and at a minimum not worsen existing operating deficiencies.

In addition, several of these intersections are experiencing crash rates above the Districts 4, 6, and state averages and are therefore designated as “crash clusters”.

The MassDOT comment letter also noted that:

The DEIR 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 consists of highway, transit, bicycle, water transportation, and pedestrian improvements.

The proponent’s mitigation and TDM commitments demonstrate a reasonable and serious approach to the project’s impacts; however, due to the unique nature and the scale of the project, MassDOT has the following issues and comments on the DEIR that should be addressed in the FEIR.

The proponent has collected data at these facilities to determine how patrons and employees are traveling to those sites. Based on this information, the DEIR has established trip generation rates for vehicular traffic for the daily, Friday and Saturday peak hours, as well as mode shares for transit riders, pedestrians, and bicyclists. MassDOT has reviewed the methodology used and found the rates within acceptable range for this type of facility.

MassDOT has determined that the trip generation calculations used to evaluate the project’s transportation impacts are reasonable.

...

Trip Distribution

The DEIR includes a temporal distribution of traffic over the course of a full week (24 hours per day) based on data collected at the comparables, which was used to determine the hourly distribution and peak hour of casino traffic. This information was used to determine the critical peak traffic analysis periods for the DEIR traffic operations analysis – that is, the periods with the highest no-build roadway volumes combined with the peak project site trips. This approach

is intended to provide a conservative estimate of traffic impacts and ensure that the mitigation program would be sufficient to address the worst case scenario.

Parking

According to the DEIR, the project will provide 2,909 parking spaces on site and 750 off-site parking spaces for employees. However, in the project description, the DEIR states that 800 off-site parking spaces will be provided for employees.

MassDOT is concerned that the lack of parking and the recirculation of valet trips could impact traffic operations along the Route 99 corridor.

The existing conditions analysis indicates that a number of intersections within the study area are operating at Level of Service (LOS) D or worse, with excessive delay. ... While these congested conditions are not uncommon in an urban area, it is imperative for the proponent to ensure that the proposed mitigation program would address some of the safety conditions, and at a minimum not worsen existing operating deficiencies.

In addition, several of these intersections are experiencing crash rates above the Districts 4, 6, and state averages and are therefore designated as "crash clusters".

As part of the project mitigation program, the project proponent has committed to implementing a transportation monitoring program that would be initiated upon occupancy of the project. The goals of the transportation monitoring program would 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. The project proponent should propose in the FEIR an appropriate timeframe for the monitoring program, or commit to initiating and performing the monitoring program upon a schedule set forth by MassDOT.

DCR DEIR comments

[DCR did not mention any Cambridge roadways in its analysis.]

DOT DEIR Comments

[DOT did not comment on Cambridge in its analysis.]

Consultant Analysis

GREEN

The City of Cambridge is petitioning based on the proximity to the proposed casino site and impacts to Cambridge roadways, especially Route 16, Memorial Drive, Land Blvd and Massachusetts Turnpike.

The traffic study included in the DEIR examined a fairly large study area in relation to the potential casino impact, and included 58 intersections across seven (7) different Towns and Cities. However, the study only included a single intersection in the City of Cambridge. The City's center is located approximately 5 miles from the proposed casino site. The studied location in the city of Cambridge is located at the intersection of Monsignor O'Brien Highway (Route 28) at the Edwin H Land Blvd which is located approximately 2 miles from the proposed casino site. The study shows no additional trips or impact to this intersection due to the proposed casino and resort. Based on the travel forecasts developed by the VAI/HSR, only a small portion of the casino related traffic is expected to originate from the City of Cambridge. The VAI/HSR trip distribution indicates 4% of the trips are originating and ending around Washington Avenue in Somerville. These 4% trips are expected to be dispersed in both Somerville and Cambridge. The study results did not indicate any major traffic related to the proposed casino traveling through the City of Cambridge.

Green estimates that about half of the estimated 37% traffic volume travelling to/from I-93 could be travelling from the Mass Pike.

Green estimates that approximately 8% to 10% of casino trips could be expected to use Memorial Drive, and travel through the studied intersection of Monsignor O'Brien Highway (Route 28) at the Edwin H Land Blvd. This would result in an additional 1,600 to 2,400 vehicles per day traveling through this intersection, with approximately 135 to 200 additional vehicle trips during to the peak hours. These additional vehicle trips could have a significant impact to this intersection, as well as to other intersections along Memorial Drive. This is in contrast to the applicant's DEIR, which assumes no additional casino-related traffic on Memorial Drive, or at the Edwin Land Blvd / Route 28 intersection. We disagree with the Applicant's assumption.

Based on our review, any safety issues at these locations are not expected to be significantly exacerbated as a result of the additional traffic from the proposed Wynn Everett casino. At each location, the additional traffic would likely result in less than one crash per year.

While Cambridge and its major roads/intersections, except Monsignor O'Brien Highway (Route 28) at the Edwin H Land Blvd intersection, were not included in the detailed traffic impact analysis, it was estimated by the Applicant that few site trips would originate or travel through the City of Cambridge. However, based on the above summary, Cambridge roadways and intersections could be expected to carry a significant amount of casino trips. It is reasonably expected that both Route 16 and Memorial Drive will carry 5% - 10% of all Wynn-Everett casino-related traffic.

...

Based on information developed from the applicant's traffic analysis, the intersection of Monsignor O'Brien Highway (Route 28) at the Edwin H Land Blvd operates at LOS F. Additional trips from the project through these location would results in significant delays. Based on our review, additional vehicle trips along

Memorial Drive and Route 16 within the City of Cambridge could be expected to result in noticeable impacts on traffic operations and level of services.

...

In addition to these volumes, additional trips are expected on Cambridge local streets with 4% of the traffic dispersing in Cambridge and Somerville from Washington Street. This will result in approximately a 5%-10% increase in peak hour traffic volumes on Route 16 and Memorial Drive as a result of additional casino trips.

Transportation Infrastructure – Minor degradation of infrastructure is anticipated due to the added trips onto Route 16 and Memorial Drive. Both Memorial Drive and Route 16 (between Mass Ave and Cambridge/Somerville city limits) have existing truck exclusions, and therefore heavy vehicles will be required to use other routes. Thus, impacts on the City of Cambridge’s infrastructure are expected to be minimal.

Peak vehicle Trips Generated on State and Federal Highways – Memorial Drive and Route 16 are maintained by the Department of Conservation and Recreation (DCR) and therefore are state roadways. As stated above, it is expected that there will be a measurable volume of additional vehicles trips on Memorial Drive during peak periods as a result of the Wynn Everett casino.

Adverse Impact on Transit Ridership and Station Parking – None of the transit stations at the City of Cambridge directly provides access to the proposed casino site. Therefore, impacts to transit or station parking as a result of the project are expected to be minimal at the City of Cambridge transit stations.

Based on the evidence summarized above, there is the potential for a measurable volume of Wynn Everett casino related traffic to travel to/from and through the City of Cambridge utilizing state highways and local roadways. It is likely that this additional traffic will result in a significant and adverse impact on traffic operations on these roadways. Therefore, **it is recommended that the City of Cambridge be designated as a surrounding community** based on impacts from traffic on its roadways, geographic proximity to the site and host community and due to operational concerns.

DEWBERRY ANALYSIS

At the request of City Point Partners, Dewberry Engineers Inc. (Dewberry) completed an evaluation of the Surrounding Community Traffic Evaluation - Cambridge memorandum that was prepared by Mr. William J. Sculley of Green International Affiliates, Inc. (Green) and is dated February 12, 2014.

Based on our assessment of the Green memorandum, which constitutes the remainder of this letter, we concur with Green’s conclusion that the traffic impacts by the Wynn Everett Casino and Resort (Project) on Route 16 and Memorial Drive

within Cambridge are sufficient basis to recommend designation of Cambridge as a Surrounding Community under Regulation 250 CMR 125.00.

References in the DEIR that relate to Cambridge include traffic studies and analyses that were conducted for the Monsignor O'Brien Highway (Route 28)/Edwin H. Land Boulevard intersection, located at the northeast corner of Cambridge, and trip distributions for Project-generated traffic that will travel to areas west, south and southwest of the Project site. Five percent of Project trips are projected to use Route 16. The south-oriented Project trips are split as follows--4% will draw from Cambridge-Somerville via Washington Street, 37% from areas south and west of Cambridge-Boston via Route 93 and 14% from Cambridge-Boston via Rutherford Avenue.

MassDOT's review of the ENF and DEIR documents mentions a general acceptance of the Applicant's transportation planning methodologies and assumptions used in preparing the assessment of its impacts on the study area roadway network and transit system. However they did not bring attention to any concern they may have, if any, regarding local roads within Cambridge. They did acknowledge that the Monsignor O'Brien Highway (Route 28)/Edwin H. Land Boulevard intersection is operating at poor levels of service during the peak periods of the day.

We agree with Green's overall approach to evaluating the transportation and traffic impact factors under Regulation 205 CMR 125.00 for purposes of the Surrounding Communities determination.

We have differences with the Green assessment however in the traffic volumes that were attributed to the Project. Where Green quoted the number of trips generated by the Project from Table 4-15 (daily volumes) and Table 4-17 (peak hour volumes) of the DEIR, we believe that Table 4-16 (daily volumes) and Table 4-18 (peak hour volumes) are the more appropriate references to use since they account for the actual vehicle trips generated by the Project.

In fact, we believe that these differences strengthen the conclusion to recommend designation of Cambridge as a Surrounding Community.

We concur with Green's assessment that the roads within Cambridge most likely to be used by Project-related trips are Route 16 and Memorial Drive. It is reasonable to assume that most of the 5% of Project trips on Route 16 will draw from westerly communities along the Route 2 corridor. These trips have to negotiate their way through the already congested junctions of Alewife Parkway/Route 2 and Alewife Parkway/Massachusetts Avenue in Cambridge. As Green mentions, further studies are necessary to better understand how the Project trips will affect the base conditions in this vicinity and to what extent.

We understand and support Green's contention that the distribution of Project trips to the south and southwest needed to have been more carefully investigated and

evaluated in the DEIR. The DEIR's distribution on the I-93 corridor (37%) and on the Rutherford Avenue corridor (14%) comprise over 50% of the total Project trips, but they are presented as lump quantities on a plan that barely shows the north section of Boston. The fact that both percentages were assigned to roads at the northeast corner of Cambridge supports the proposition--cited by Green--that a fair percentage of Project trips will use the Monsignor O'Brien Highway (Route 28)/Edwin H. Land Boulevard intersection.

Ideally the DEIR trip distribution map should have been expanded south of the Mass Pike (I-90) to illustrate where the 37% and 14% trips would have broken down into smaller percentages. Table 4-20 of the DEIR--i.e. Market Area Travel Time--indicates that 62% of all Project trips will be within a 30-minute travel window and almost 80% in a 1-hour travel time window. By considering these travel time windows with the combined 41% (14% plus 37%) trip distributions, it is reasonable to deduce that some 8-10% of Project trips would draw from communities to the west and southwest of Cambridge, such as Watertown and Waltham. These people would be expected to be familiar with local roads. They would also know that, if they intend to travel on I-93, they must use I-90, which is a tolled facility. With these considerations and the relative location/distance of these communities to the Project location, the reasonable route choice for them would be Memorial Drive over I-90/I-93. Therefore and using the lower estimate of 8%, Memorial Drive can be expected to attract approximately 137 of Project trips during the typical Friday peak hour.

Projected Changes in Level of Service (LOS)--We agree that the Applicant's DEIR did not account for traffic impacts by Project trips on any road or intersection within Cambridge. This omission is notable because the DEIR presented analyses of Existing and future No Build conditions at the Monsignor O'Brien Highway (Route 28)/Edwin H. Land Boulevard intersection. Had the Applicant traced the trip distributions further south and further west from where they noted their last distributions in the DEIR, they likely would have ended up with the same deductions that Green came to about impacts on roads and intersections within Cambridge along Route 16 and along Memorial Drive.

Increased Traffic Volumes on Local Streets--We agree that the 5% of trips on Route 16 would have a significant impact on the intersections along Alewife Parkway, which are located in Cambridge. We also agree that Memorial Drive can expect to serve 8%-10% of Project trips whose market areas include communities to the south and southwest of Cambridge.

Transportation Infrastructure--We agree that Cambridge streets will not offer a convenient route for heavy vehicles that are involved in the Project construction; hence the impact of construction vehicles on Cambridge streets would be minimal to none.

Peak Vehicle Trips Generated on State and Federal Highways-We agree that Memorial Drive and Route 16 as DCR and state facilities will serve a fair amount of Project trips. I-90 and I-93 will be used by at least a third of all Project trips.

Adverse Impact on Transit Ridership and Station Parking-We agree that Project impacts on transit ridership and station parking in Cambridge will be minimal, if any, since transit services in Cambridge have not direct connections with the Project site.

A. COMMUNITY PETITION

Transcript

p. 64, Ms. Clippinger

4 MS. CLIPPINGER: Good morning. I'm
5 Sue Clippinger. I'm the Director of the
6 Traffic, Parking and Transportation Department
7 in the city of Cambridge. And I just want to
8 talk a little bit about the transportation
9 issues that we are concerned about.

22 One of the things that we're
23 incredibly proud of is that we've been working
24 on development in Kendall Square. Hopefully,

p. 66, Ms. Clippinger

1 people realize that there's been a huge
2 improvement and new activity in Kendall Square.
3 Forty-five percent of the people who
4 commute to and from jobs in Kendall Square are
5 coming from the north and northwest areas that
6 are in the same direction that the casino is
7 from the city. So, we are concerned about the
8 big increase of traffic. And we obviously want
9 to continue to have Kendall Square as a vibrant
10 and growing area.
11 We've had four million square feet
12 of development that's been added in Kendall
13 Square. And the percentage of employees that
14 are driving to work at those establishments in
15 the last 10 years have dropped from 55 percent
16 of people driving to 43 percent of people
17 driving. And we are working incredibly hard.
18 We have innovative ordinances. We
19 are active in the permitting process for large
20 projects to encourage them to use transit, to

21 walk, to bike. And we're trying to make sure
22 that we are effectively using the scarce
23 resource of the roadway system that feeds this
24 area. We feel we've been incredibly

p. 67, Ms. Clippinger

1 successful.
2 The traffic counts that we are doing
3 is showing that traffic growth in Kendall
4 Square has been flat even while we've added
5 four million square feet of development.
6 The casino is assuming that 77
7 percent of their patrons are going to drive.
8 So, obviously this is of grave concern to us.
9 The other issue, key issue for us is
10 transit. And we want very much for that to
16 happen.
17 It's been identified by both the
18 MBTA's program and MPL long-range planning as
a
19 key transit need in the area. And we want to
20 make sure that that effort moves forward and
21 that we can be as a region as creative and
22 innovative as possible in making that transit
23 connection. That's a connection that is
24 affecting other surrounding communities and
p. 68, Ms. Clippinger
1 everybody needs to be at the table in making
2 that happen.
3 So, in summary I think what we are
4 saying is we feel that there are challenges
5 here obviously, in terms of traffic. There are
6 opportunities is in terms of transit
7 improvements and that the surrounding community
8 process is a way of trying to address these.

9 And that Cambridge should be a part of that
 10 effort to look for ways to make this a
 11 successful effort. Thank you.
 12 COMMISSIONER MCHUGH: I'm not sure I
 13 understood the last point. What impact on what
 14 we're talking about today does the desired
 15 transit connection between Kendall and Sullivan
 16 Square have? Sounds wonderful, but what impact
 17 in what we are trying to decide today does that
 18 have?
 or

4 with casino with the kinds of trips being
 5 generated for all available space to be used
 6 for moving automobiles. And what we're trying
 7 to do is make sure we have a balance between
 8 what the automobile needs are but also making
 9 sure that space is available to make these
 10 transit improvements and that we don't look
 11 back on the implementation of a casino and say
 12 well, we've lost all of this space that we
 13 would we need.

14 And if we can have strong transit, I
 15 think it makes a huge benefit to the whole
 16 region in terms of being able to keep the
 17 existing roadway capacity meeting the vehicle
 18 needs because we're able to provide transit for
 19 a large portion of people who would like that.

p. 95, Ms. Clippinger

13 MS. CLIPPINGER: I think I just want
 14 to reiterate two points to relate my comments
 15 to the slides that were just shown. We are as
 16 a community surrounded by surrounding
 17 communities. As part of the identification of
 18 the surrounding communities and feel that we
 19 share many of the challenges and impacts of
 20 those communities that have been identified.
 21 Secondly, the slide that was just
 22 shown that showed the roads in Cambridge that

23 would potentially have traffic on them from the
 24 casino all run east-west. And the comments I
p. 96, Ms. Clippinger

1 was making was traffic that we expect to see
 2 essentially running north-south or northeast-
 3 southwest through our community.

Thank you.

p. 97, Ms. Clippinger

3 MS. CLIPPINGER: Great. We are
 4 concerned about running this way. That people
 5 are going to shortcut through the city to get
 6 over here.

7 The other area that we are concerned
 8 about is

11 or even worse through the east Cambridge
 12 neighborhood who are trying to make this move
 13 across this way instead of going around.

14 Those are the two areas where we see
 15 traffic today, and where we would expect that
 16 the casino would add additional traffic. And
 17 those are the areas where we are concerned
 18 about.

p. 100, Ms. Clippinger

22 MS. CLIPPINGER: One of the other
 23 traffic concerns and thoughts we have is that
 24 the casino traffic, which is going to the

p. 101, Ms. Clippinger

1 casino may be taking space on roadways which
 2 are currently being used by other commuters who
 3 are coming to Kendall Square and other areas.
 4 So, that some of the impact isn't necessarily
 5 just people who going directly to the casino,
 6 but it's the casino's use of capacity within
 7 the system which may cause other commuters to
 8 seek alternate routes. Those also obviously
 9 are going to affect us and adversely in many
 10 cases stopping.

Cambridge Traffic



B. APPLICANT RESPONSE

Jacqui Krum/Wynn 1/23/2014 letter

As part of our application process, Wynn MA, LLC (“Wynn”) thoughtfully and deliberately reviewed the statutory definition of a “surrounding community” as set forth in 205 CMR 125.01. In particular, we considered the following factors: (1) proximity to host community and gaming establishment including location of residential communities; (2) “significant and adverse” transportation infrastructure impacts caused by the gaming establishment; (3) “significant and adverse” pre-opening impacts including noise and environmental impacts and increased construction vehicle trips; (4) “significant and adverse” post-opening impacts including public safety, utility demand, housing impact, impact on local retail, entertainment and service establishments, social service needs including, but not limited to, those related to problem gambling, and impact on public education in the community; and (5) any other “significant and adverse” impacts caused by the gaming establishment.

To facilitate our review of the foregoing, Wynn engaged outside experts to provide a thorough analysis of potential impacts. Attached please find a copy of the following studies: (i) RKG Associates Inc.’s “Impact of the Wynn Resort Casino on Neighboring Communities” dated August 29, 2013; (ii) TMG Consulting’s “Gaming Market Assessment” dated November 2013; and (iii) TMG Consulting’s “Projected Benefit for Regional Businesses.”

Wynn 1/29/2014 Community Presentation:

Slide: “Wynn Everett Traffic Distribution”

Table indicates zero direct and zero indirect trips in or out of Cambridge.

Slide “Traffic Mitigation” states, “No traffic mitigation required in any of petitioning communities.”

City	Direct in %	Direct Out %	Indirect In %	Indirect Out %
Malden	6	6	0	0
Medford	20	13	0	0
Boston	56	63	0	0
Chelsea	12	12	0	0
Somerville	0	0	25	16
Cambridge	0	0	0	0
Lynn	0	0	1	1
Melrose	0	0	3	3
Saugus	0	0	8	7

Hearing Transcript – 1-29-2014

p. 78-79 – Kim Sinatra, Wynn

10 have happened there. We continue, regardless
 11 of how it comes today, we intend to continue
 12 our conversations with Cambridge and all of the
 13 regional players, because we want to, if we're
 14 lucky enough to be able to come to the
 15 Commonwealth of Massachusetts,
 18 That doesn't mean you're a
 19 surrounding community, however, because a
 20 surrounding community is very specifically
 21 defined. And so while we'd like to get folks
 22 out their cars, we'd love to minimize crime and
 23 we'd like to be part of regional task force and
 24 all of those items that doesn't make a
 1 community necessarily a surrounding community
 2 under the regulation with the attendant
 3 required agreements.

p. 85, Mr. Gordon

2 The other is the numbers are very
 3 small. And we'll talk about those in
 4 particular when we get to each city but there's
 5 just not a lot of traffic in those cities. And
 6 as you look at our DEIR application, if you
 7 boil it all down, traffic really is our impact.
 8 Everything else turned out positive. The
 9 negative was traffic. So, we decided to focus
 10 on that.
 11 Again, we won't go through this in
 12 detail but the way the city and the state
 13 process works is first we identify our traffic.
 14 Then we identify what the problems it causes is
 15 and then we figure out how to mitigate it.
 16 So, through our environmental
 17 process, including all of the state agencies,
 18 we've identified about \$40 million of traffic
 19 mitigation that we're going to do and we think

20 we should. That we think mitigates any impact
21 we have.

22 So, this is separate from
23 surrounding communities, separate from any of
24 them. This is just funding that we're going to

pg. 86, Mr. Gordon

1 provide for some of the stuff you heard about
2 earlier today, rebuilding Santilli, Sweetser,
3 the issues in Wellington, issues in Sullivan
4 Square, issues on Broadway, Revere Beach
5 Parkway. All of that is part of our mitigation
6 package, which we are already committing to
7 through our environmental process.

p. 93, Mr. Gordon

8 This obviously shows where Cambridge
9 is compared to the site. We also look

p. 97, Ms. Pyke

20 MS. PYKE: Good morning Keri Pyke
21 from Howard Stein Hudson, traffic consultant

22 for the Wynn team. Certainly,
23 if that project were to go forward, that would
24 be one of the key pieces to think about.

25 We want the transit pieces to work
26 too because we are presuming that our employees
27 particularly will be able -- we want them to be
28 able to use transit and then connect to
29 shuttles that go directly to the Wynn and to be
30 able to do that efficiently.

31 So,

p. 101, Mr. Gordon

32 MR. GORDON: Just one minor point
33 there. As you remember from our filing, our
34 peak is at 9:00 at night. So, we wouldn't
35 envision impacting many commuters in the
36 system

37 wide because most of our peak is quite
38 different from the computing people.

C. RPA ANALYSIS

]

MAPC – DEIR Comment Letter, 2/11/2014

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 2.6 million square foot resort and casino that will contain a 500 room luxury 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 (Route 99) in Everett. The project 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. The busiest times will be Friday and Saturday when the number of daily vehicle trips the project is forecast to generate will be 21,552 and 25,456 respectively. Of these daily vehicle trips, 1,743 will be generated during the Friday afternoon peak hour (4:30-5:30 PM) and will increase to 2,122 during the Saturday afternoon peak hour (2:45-3:45 PM). A total of 2,909 garage parking spaces are proposed for the project.

The Proponent plans to file an application with the Massachusetts Gaming Commission seeking a license to operate a Category 1 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 Draft Environmental Impact Report (DEIR) and has concerns that focus primarily on regional traffic impacts; the negative impact that traffic might have on nearby development opportunities; the need for additional mitigation, especially to encourage transit use; the lack of detailed information regarding regional shuttles and charter buses; and the need for a specific mode shift goal, along with a robust monitoring program. These issues, proposed recommendations, and additional questions are detailed as an attachment to this letter.

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 1 gaming establishment, is likely to make all these goals more challenging to achieve. Therefore, MAPC believes that you face 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. We respectfully request that you incorporate our recommendations and questions into the scope for the Final Environmental Impact Report (FEIR).

Metropolitan Area Planning Council (MAPC) Comments on Wynn Everett DEIR - MEPA #15060

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Casinos 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 will be Friday and Saturday when the number of daily vehicle trips the project is forecast to generate will be 21,552 and 25,456 respectively. Of these daily vehicle trips, almost 1,743 will be generated during the Friday afternoon peak hour (4:30-5:30 PM) and will increase to over 2,122 during the Saturday afternoon peak hour (2:45-3:45 PM). A total of 2,909 garage parking spaces are proposed for the project.

MAPC's biggest concern is that traffic congestion caused by the project will hamper long planned development that is occurring or planned in close proximity to the Everett, Charlestown, Somerville, and Medford municipal borders. While the trip generation analysis attempts to quantify future traffic conditions, MAPC is concerned that the forecasted increase in auto trips from the proposed casino and all of the combined area developments will create severe impacts on this region. Notwithstanding additional roadway improvements, it is essential that the proponent make a concerted effort on three fronts: 1) additional public transit related mitigation to convert more trips from auto to transit, 2) a comprehensive shuttle program for patrons and employees that includes comprehensive satellite parking locations, particularly for patrons coming from the south, and 3) a well-designed program for charter bus service.

If the Proponent focuses solely on traditional roadway improvements, as currently proposed, this could result in negative impacts on bicycle and pedestrian connectivity, noise, and air quality. Therefore, the Proponent needs to take specific actions that would maximize the proportion of non-auto trips to the site by patrons and employees. Toward that end, MAPC respectfully requests that the Secretary require that the Proponent include a monitoring program designed to ensure specifically defined mode share goals and adhere to a mitigation timeline. The following are specific components MAPC would like to have the Proponent address as part of the Final Environmental Impact Report (FEIR).

Roadway Impacts

The Proponent has committed to assisting with local roadway and safety improvements and has already proposed a roadway mitigation program that totals \$30.6 million. However, there are specific areas where the mitigation program can be strengthened. In order to deal with issues of accessibility, congestion, air quality, and safety, the Proponent must not only take steps to improve traffic flow, but must also take equally aggressive steps to strengthen public transit and encourage the conversion of trips from automobile to transit and other alternative modes. Specific locations are as follows:

Roadway Changes to Improve Bus Service along Route 99

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 the Route 99 corridor, 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, 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.

Sullivan Square, Rutherford Avenue, and Assembly Row

The City of Boston and MassDOT (Project #606226) have undertaken an extensive study of alternatives to improve traffic operations and safety at Sullivan Square, reconnect this Charlestown neighborhood to the waterfront, improve pedestrian and bicycle access, and open up undeveloped parcels to create a new mixed-use neighborhood around the Sullivan Square Orange Line Station. A preferred alternative was recently selected by the City of Boston after extensive public outreach and comment. This alternative will entail the removal of the current Rutherford Avenue underpass and Sullivan Square rotary, and replace these facilities with a landscaped surface street grid controlled by a coordinated traffic signal system. Additionally, the Boston Redevelopment Authority (BRA) and MAPC recently completed a land use study for the Sullivan Square area ([Sullivan Square Disposition Study](#)). This study lays the

foundation to create a mixed-use, walkable neighborhood with new housing and business opportunities in close proximity to the Orange Line.

One of MAPC's biggest concerns is the level of traffic impacts on Sullivan Square and Rutherford Avenue generated by the casino project, along with impacts from other anticipated development. For example, 15% of patron trips and 9% of employee trips to the casino are forecast to utilize Rutherford Avenue to access the project site, and 63% of patron trips will access the site via Sullivan Square. The City of Boston's redesign of Rutherford Avenue decreases current capacity in order to enable improved pedestrian and bike access, provides additional open space, and creates a much more livable street than the current Rutherford Avenue, which acts as a highway isolating the Sullivan Square area from the rest of Charlestown. Similarly, the new gridded street network planned for Sullivan Square will enable new transit-oriented development (TOD), generating both jobs and homes and creating a more vibrant neighborhood.

The Somerville side of Sullivan Square will act as one of the main access points to the new Assembly Row development, which will become one of the state's largest mixed-use developments clustered around a new Orange Line Station. Further to the west of Sullivan Square is the Inner Belt area of Somerville, which is another site slated for mixed-use TOD, made possible by the extension of the Green Line from Lechmere into Somerville.

Wellington Circle

The other area of major 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 provide additional mitigation beyond what is currently proposed for this area. The Proponent should work with MassDOT, DCR, Medford, and MAPC to determine the additional components that they will be responsible for mitigating.

Taken together, a tremendous amount of public and private funding is supporting the infrastructure at these sites. No single project should be allowed to endanger the viability of these long-term plans for neighborhood improvement, expanded housing, and economic development. Therefore, the Proponent should be responsible for additional mitigation that will specifically convert more auto trips to shuttles, public transit (subway and bus), and other modes, thereby reducing the negative traffic impacts on rezoning, development, and infrastructure plans already underway in Boston, Somerville, and Medford. Furthermore, we believe the Proponent should contribute to the redesign efforts at Rutherford Avenue and Sullivan Square by paying for a portion of the design, engineering, and development costs, in light of the increased traffic impacts that the casino will generate in these areas. The Secretary should require the Proponent to work with MassDOT, the surrounding cities, and MAPC on both short-term and long-term solutions to these difficulties in such a way as will advance the municipal redevelopment visions, roadway design plans, and improved regional connections.

Traffic Analysis

Patron Mode Share

The DEIR assumes that 69% of patrons will drive to the site, 10% will take the Orange Line, 10% will arrive by tour bus, 8% will arrive by taxi, and 3% will use water transportation. The traffic analysis does not assume a mode share for patron access to the site by either MBTA bus or on foot. MAPC disagrees with this assumption and requests that the traffic analysis be revised to include these two modes. Accordingly, the revised traffic analysis needs to be included in the FEIR.

It is important to note that the empirical data from comparable gaming facilities used to develop patron trip rates allocated mode shares for both pedestrian and bus access. Specifically, 5% of trips were assumed to be by public transit or pedestrian mode for Sugar House Casino in Philadelphia, Pennsylvania.¹ The mode share for the Resort World Casino at Aqueduct in Queens, New York assumes that 1% of patrons will arrive to the site by taxi, 11% by local bus, and 2% by walking or bicycling.²

1 Updated Traffic Impact Analysis – SugarHouse, Gannett Fleming, October 13, 2006.

2 Development and Operation of a Video Lottery Facility at Aqueduct Racetrack, Jamaica (Borough of Queens), SEQRA, Environmental Assessment Form, New York State Division of the Lottery, October 2010.

Route 99 (Broadway) Peak Hour Analysis

The Proponent conducted two types of peak hour analysis for the Friday p.m. peak hour and the Saturday afternoon peak hour for Route 99 (Broadway). One analysis combined existing peak hour with the peak hour trips generated by the project (peak + peak). The second, and less conservative analysis, combined peak hour traffic of the roadway with the actual amount of traffic that would be generated by the project during that hour – referred to by the Proponent as the “real” traffic analysis. The FEIR needs to succinctly summarize and clearly describe and compare the differences between the peak + peak and so-called “real” traffic analysis.

Mitigation for Public Transportation

It is important to note that *Hub and Spoke*³, a report recently completed by Northeastern University, has determined that the Orange Line already has congestion and capacity issues. Specifically, the Orange Line from North Station to Downtown Crossing is highly congested. *Hub and Spoke* raises serious concerns about congestion and potential capacity on this segment of the Orange Line.

³ *Hub and Spoke*, Core Transit Congestion and the Future of Transit and Development in Greater Boston, Northeastern University, June 2012.

⁴ Capacity is defined as 100% of seats.

⁵ *Wynn Everett, Draft Environmental Impact Report*, Volume II, December 16, 2013, pages AI-7, AI-12, AI-18, AI-19, AI-41, AI-60, AI-83, AI-99, and AI-105.

The Proponent assumes that 80% of all Orange Line riders destined to the project site will originate from south of Sullivan Square. As acknowledged by the Proponent, these riders will prefer to exit at Sullivan Square station rather than travelling further north to Wellington or Malden Center Stations. Based on their own analysis, the Proponent has identified that the weekday passenger load currently exceeds capacity (107%) in the northbound direction between North Station and Community College Station. However, when project trips are added, the load increases to 117%.⁴

While the Proponent has committed to an extensive mitigation program for roadway improvements, mitigation for public transportation is minimally addressed. The Proponent needs to outline how they will coordinate with the MBTA, specifically identifying how connections to and from the project site can be enhanced for patron bus use, and how increased patron use will impact MBTA bus capacity. The Proponent should partner with the MBTA by contributing to the operating costs of area bus lines and the Orange Line in an amount that is reasonably related to the project’s additional demand. Opportunities for improving Orange Line service include assisting with decreasing headways in order to alleviate overall capacity issues.

A valid Transportation Demand Management (TDM) program, which would be tailored to include mode share goals for all types of public transit, including bus service for patrons and a decreased reliance on taxis, should incorporate this partnership with the MBTA. As mentioned by the Proponent throughout the DEIR, “An important facet of the transportation improvement program is incentivizing both employees and patrons to use alternative modes of transportation to access the Project in order to reduce both traffic and parking demands associated with the Project.”⁵

Yet, MAPC concludes from a review of the details provided in the DEIR, that the Proponent does not provide adequate mitigation to make such a “transportation improvement program” a reality. The overall shift of vehicle trips to alternative modes of transportation is insufficient, and the Proponent should be required to take additional steps (as outlined in this letter) to achieve more significant goals.

Mitigation Timeline

The scope and schedule of proposed mitigation need to be clearly outlined as part of the MEPA process. All mitigation commitments should ultimately be included in the Section 61 findings as a basis for subsequent permitting as well as in the relevant Host Community and Surrounding Community Agreements.

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. Ideally, this will include the additional mitigation that MAPC is calling for in this letter, specifically in regard to improved transit service, conversion of automobile trips to alternate modes, and preserving the integrity of development plans and neighborhood redesign in Boston, Somerville, and Medford.

Plans for the long range maintenance and upkeep of infrastructure improvements (e.g., new and existing roadways, transit improvements, and bicycle/pedestrian infrastructure) should also be included. It is recommended that

transportation infrastructure improvements take place as early as possible so these improvements will both benefit the metropolitan area and improve traffic flow during construction.

Mode Shift and Monitoring Program

A monitoring program must be designed to ensure specifically defined mode share goals (vehicular, subway, bus – including charter, shuttle, and public), bicycle, pedestrian, and water transit for both patrons and employees are accomplished. An estimate of likely mode share is not a goal – a real goal includes a target for shifting car trips to other modes, along with specific steps to achieve that goal. For example, as we have said earlier, the Proponent estimates that 69% of patrons will drive to the site; the Proponent also predicts that 20% of employees and 10% of patrons will use the Orange Line. These are just predictions; they are not goals for improved performance.

Mode share goals should be consistent with the Commonwealth’s mode shift goal of tripling the share of travel in Massachusetts by bicycling, transit and walking. Along with specific steps to achieve these goals, the Proponent should provide annual updates, publicly sharing the results. Mode share goals should result in an increase of public transportation, shuttles, charter buses, walking, and bicycling, and a decrease in single-occupancy vehicle (SOV) use.

The Secretary should require that the Proponent establish a goal consistent with these principles, along with a monitoring program to ensure compliance. While MAPC is pleased the Proponent has committed to a monitoring program for a period of five years, specific locations for monitoring must be identified in the FEIR.

The monitoring program should have measurable milestones and serve as a benchmark for progress in meeting the mode share goals and other transportation objectives, including changes in parking, local and regional traffic, and public transportation. It should outline contingency measures that will be undertaken if these benchmarks are not met. The intent of the transportation monitoring program is to confirm that actual changes are consistent with forecasted changes. With a monitoring program, the actual impacts of a project can be determined and additional mitigation measures identified. Shortfalls in meeting mode share or other targets can be identified and remedied. The need and schedule for the implementation of additional mitigation measures will depend on the results of the transportation monitoring program. We ask the Secretary to require that the Proponent respond to this request by preparing a transportation monitoring program which addresses the details of how the mode share goals will be attained, including steps that will be taken if goals are not met. Ongoing consultation with MassDOT, the impacted municipalities, and MAPC should be an essential part of the TDM plan.

Shuttle Service

MAPC is pleased that the Proponent has proposed a shuttle program which will operate between off-site parking facilities and the project, with local neighborhood stops along the route, and with headways ranging between 10-15 minutes. The DEIR assumes 44% of employees will park remotely and ride the shuttle and 20% of employees are expected to board/alight at neighborhood stops. MAPC looks forward to reviewing a more detailed response to the following questions and comments:

The Proponent plans to lease approximately 750 spaces in three offsite parking facilities in Everett, Medford and Malden. Where are the exact locations, anticipated ridership, and number of parking spaces at each of the three proposed satellite parking locations, and where are the neighborhood stops?

While the DEIR mentions a shuttle program for employees, explanation about how patrons will use the shuttle buses needs to be addressed in the FEIR. As noted in the DEIR, the majority of patron trips the project is forecast to generate will be entering and exiting from the south, 38% from I-93 and 15% from Rutherford Avenue. Satellite parking locations serving this significant segment of patron trips need to be designated.

The Proponent should consider coordinating their shuttle services with Massport’s Logan Express bus service. Logan Express has full-service bus terminals and secure parking in Braintree, Framingham, Woburn, and Peabody.

There needs to be a strong incentive program that encourages both patrons and employees to use the shuttle service.

The Proponent should consider providing MBTA passes to employees (Monthly Link Pass) as an incentive to use public transportation.

- In addition to coordinating shuttle service schedules with existing MBTA bus route schedules, it is important to ensure that the travel times and headways along the shuttle routes offer frequent service on a continuous basis.
- MAPC strongly encourages the Proponent to use a fleet of electric, CNG, LNG, or other alternative fuel vehicles for the shuttle service.
- Shuttle bus service for patrons should operate according to specific schedules and at designated locations for the sole purpose of providing transportation to individuals who have already decided to visit the casino. They should not operate in a “demand push” format, which can encourage addictive behavior and negatively impact lower-income communities and seniors. No inducements should be offered as part of the shuttle service.

Charter Buses

The Proponent’s proposal for casino access for charter buses is alarmingly incomplete. While the DEIR does mention that bus parking will be located off-site within a few miles of the project, there is no mention of where this parking location would be or how many spaces are proposed to be allocated. The Proponent’s proposal for casino access by charter bus is not addressed. For example, will 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? Remote parking with shuttle access may be the preferred alternative since pick-up and drop-off at the main entrance may result in delay and queuing.

Water Transportation

MAPC appreciates the Proponent committing to provide water shuttle services for both patrons and employees. MAPC looks forward to reviewing a more detailed response to the following questions and comments:

- The DEIR states that the water shuttle service will initially provide service with stops in Downtown (Long Wharf or Rowe’s Wharf) and South Boston (World Trade Center), with potential for expansion to other Boston Inner Harbor locations if demand increases. However, how will this water shuttle service connect with the Inner Harbor ferry terminal locations and existing water taxi services?
- Providing water transportation to and from Draw 7 Park in Somerville to promote access to Assembly Square in Somerville should be seriously considered.
- Will there be a fee for patron use of this service? A cost structure should be developed that would make water transportation a service competitive enough to attract a substantial number of riders.
- What is the anticipated timeframe that water transportation will be available considering there will be dredging and the boats will need to be custom designed due to height restrictions?

Impacts to the MBTA Maintenance Facility

The Proponent is seeking to build the entrance to the proposed casino from Broadway across the southeast corner of the site. This access road would overlap with the main secure entrance to the MBTA Maintenance Facility, requiring that the entrance be relocated. This relocation would change the orientation and the use of the site because all employee and truck deliveries are made through an existing gated entrance. It is important to note that the Beacham Street/Broadway (Route 99) intersection is forecast to operate at LOS F for Friday and Saturday peak periods. The Maintenance Facility is an essential backshop to MBTA services and operations and it is imperative that this facility remain accessible and available at all times for MBTA use. The Proponent proposes a new access road to service both the MBTA facility and to provide a Service Road into the Proponent’s site.

- How will this new entranceway function? It is critical that the Proponent ensures that delivery vehicles and employees can safely enter and exit the site and not interfere with existing MBTA operations.
- Can the entrance roadway be made wide enough so that access to the MBTA facility is segregated from vehicles headed to the project’s access roadway? MBTA-related traffic must be fully segregated from all other traffic for operations, safety, and security reasons.

Truck Traffic

MAPC acknowledges the Proponent proposes to reduce truck traffic along the segment of Lower Broadway (Route 99) between Beacham Street and the Boston City Line by making improvements to Robin Street and Dexter Street. In order to provide improved and safe access to the industrial and port area east of Lower Broadway, several questions remain regarding truck access and management:

- What are the estimated number, size, and frequency of trucks accessing the project site as well as other truck activity taking place nearby in the Lower Broadway industrial and commercial area?
- What percentage of truck trips are anticipated to access the project north of the project site and south of the project site?
- Although the DEIR contains a plan showing back of house access and egress, the FEIR should provide a plan depicting truck access and egress on a scale depicting the City of Everett and its surrounding communities.

It is important to note that while land uses are predominantly industrial and commercial in the Lower Broadway area, there is a residential population, many of whom are minority and/or low-income⁶. It is critical that access and routing for trucks be designed with pedestrian safety in mind.

⁶*Malden River Area Opportunities Plan*, Parsons Brinckerhoff, August 2012.

Parking Fees

The Proponent should propose parking policies and management strategies such as fees for parking and parking cash-out policies for employees that are designed to reduce parking demand and automobile use.

The FEIR should explain whether there will be a fee for patrons and employees to park. MAPC strongly encourages the Proponent to consider incorporating a fee which will fund the TDM program and/or mitigation for environmental impacts. As has been acknowledged in the DEIR, the Proponent needs to provide disincentives for commuters to view the project parking garage as a commuter location.

Pedestrian and Bicycle Access

MAPC is pleased the Proponent has committed to strengthening pedestrian and bicycle connections to the site, specifically including an extension of the harborwalk along the Mystic River that will allow pedestrian and bicycle connections between Lower Broadway, Gateway Park, the Mystic River Reservation, and Wellington Station on the MBTA Orange Line subway system.

It is important that a connection is also provided to the Northern Strand Community Trail to the north. A designated part of the East Coast Greenway, a continuous planned trail along the east coast connection from Maine to Florida, the Northern Strand Community Trail involves developing a multi-use trail system that will ultimately link Everett, Malden, Revere, Saugus and the Lynn seashore with a ten-mile-long bicycle and pedestrian trail system.

Assembly Square

Assembly Square is the site of an ongoing mixed-use, smart growth development project along the Mystic River in Somerville. A new MBTA Orange Line station at Assembly Square is planned to serve this new development. Sited between Sullivan Square and Wellington Stations, New Assembly Square Station is currently under construction and is expected to be completed this year. As there is no direct roadway connection from Everett to New Assembly Square Station, the Proponent needs to recommend and implement an option for bicyclists and pedestrians to connect between the station and casino. Options including a new pedestrian/bicycle bridge and adding on to the commuter rail bridge should be examined.

Gateway Connector Path

The Proponent should ensure that the Gateway Connector Path and proposed underpass improvements are implemented with full 24/7 public access. As mentioned in the *Everett Central Waterfront Municipal Harbor Plan (October 2013)*, this location has the potential to provide a strong connection to the site for pedestrians and bicyclists. In addition to providing access to the project site, this connection will promote the project's waterfront for public access and use. An additional connection for pedestrian and bicycle access should also be considered at

Horizon Way connecting Gateway Center and the project site. There is also the consideration that Horizon Way access could provide additional emergency access for fire vehicles.

Bicycle Parking

While the Proponent has indicated it will provide long term bicycle parking in the garage and short term parking throughout the site, the locations and amount of spaces have not been specified. In addition, on-site showers, lockers, and changing facilities, as well as financial incentives to encourage patrons and employees to bicycle to the site should also be included as part of the project.

Commuter Rail Access

The Proponent plans to continue to explore with the City of Everett and the MBTA provision of a flag-stop on the Newbury/Rockport Line to serve both Everett and the project. Further study is needed to determine the location, accessibility and feasibility of this commuter rail stop. The study should address the impacts on the entire Newburyport/Rockport line, the effect on area MBTA bus routes, and estimated potential ridership. It is MAPC's position that a flag-stop on the Newburyport/Rockport line should be viewed as secondary to other area transportation options such as utilizing the MBTA Orange Line, MBTA bus routes, shuttle buses, and water transportation.

Casino-Related Vehicular Accidents and DUI

Studies have shown that casino traffic is more prone to accidents, such as drunk-driving incidents, than regular traffic. The Secretary should require the Proponent to address the likelihood of an increase in accidents in the FEIR. The Proponent should take into account accidents involving patrons travelling to and from the project by vehicle, bicycle and foot, even when those accidents occur relatively far from the site itself. The Proponent should analyze the likelihood of whether the number of DUI-related accidents will increase and include a clear explanation of what steps will be taken to proactively minimize drunk driving and the accidents that may occur as a result (e.g., education programs, serving of alcohol, mitigation to Police, Fire and Emergency-management departments). MAPC has located several resources that address the likelihood that casino traffic is more prone to accidents. The resources and their key findings are summarized below. The Secretary should require the Proponent to review and respond to this information.

Chad D. Cotti and Douglas M. Walker, "The impact of casinos on fatal alcohol-related traffic accidents in the United States," *Journal of Health Economics*, 2010, pp. 788-796.

This study explored whether there is a link between casino expansion and alcohol-related fatal traffic accidents by looking at the timing and locations of casino openings over a 10-year period and isolating the impact of casino introduction on alcohol-related fatal accidents. Results indicate that there is a strong link between the presence of a casino in a county and the number of alcohol related fatal traffic accidents. Specifically, the study found that alcohol-related fatal accidents increased by 9.2 percent in counties with casinos.

Spectrum Gaming Group, *Gambling in Connecticut: Analyzing the Economic and Social Impacts*, June 22, 2009.

In 2009, Norwich, CT, located near Mohegan Sun and Foxwoods, reported that DUI arrests have more than doubled since 1992. The nearby towns of Montville and Ledyard also experienced significant increases. Roughly 20 percent of the motorists in Montville, Ledyard and North Stonington arrested for DUI acknowledged to police that their last drink was at a casino (page 13).

The report contains information from local police departments, the State Police, and the Department of Transportation that compares some of the towns close to the casinos with those of similar population that are much further away from the casinos. The comparison concluded that Norwich registered significantly more arrests.

Zach Lindsey, "Sands Casino linked to increase in DUIs by Northampton County report,"

The Express-Times, July 22, 2012.

Drunken driving arrests were reported to have nearly doubled in Bethlehem, PA, after the Sands Casino Resort opened in 2009 while they have remained consistent in a nearby non-casino county, Northampton County.

Chapter 91 and Municipal Harbor Plan (MHP)

The DEIR acknowledges that the proposed building height, setback, lot coverage, and water dependent use zone do not conform to standard Chapter 91 criteria, but explains that substitutions and offsets for these have been proposed in the Everett’s Municipal Harbor Plan (MHP). The MHP was submitted to EOEEA in October 2013 and is still under agency review. A concern from a MEPA perspective is the timing of the MHP final approval with respect to the MEPA review process. Since the MHP was not yet approved by the time this DEIR was filed, it will be important to ensure that the MHP process is concluded by the time the FEIR is filed.

Stormwater

While MAPC typically advocates for the maximum feasible use of Low Impact Development techniques to manage stormwater, the DEIR demonstrates that there is limited opportunity on this site primarily due to extensive subsurface contamination. Limited use of tree box filters and bioretention swales are proposed on portions of the site with appropriate soil conditions. Green roofs are also proposed, however in only very small sections of the project’s roofs. The DEIR acknowledged that “the building’s roofs generate the vast majority of stormwater runoff...A portion of the building will be provided with rooftop planting or ‘green roof’ located on the northwest edge of the back of house service area.” While the text does not describe the size of the green roof area, Figure 2-8 shows two very small areas designated as green roofs:

Proposed Green Roof Areas

MAPC recommends that the proponent expand the green roof areas to a more significant portion of the adjacent lower roof area to maximize the stormwater benefits. Given the lack of opportunity for other LID measures on the site and the predominance of roof areas as the source of runoff, green roofs should be a more significant part of the design. This relatively modest step would also give both the City of Everett and the Proponent a significant opportunity to demonstrate attention to environmental issues.

The stormwater section describes the components of the system qualitatively, but does not provide quantitative data on stormwater flows for storms of various magnitudes (design storms). These data have been developed, as evidenced by detailed printouts of HydroCAD calculations included in the appendix. This “raw” data output should be presented in summary form in the FEIR to characterize the components of the stormwater management system for each design storm. In order to address potential climate change impacts of more intense rainfall, the stormwater analysis should also include a scenario based on the rainfall estimates of the Northeast Regional Climate Center (NRCC), as an alternative to the standard Natural Resources Conservation Service estimates.

Hazardous Waste and Massachusetts Contingency Plan Compliance

Considering that site contamination is one of the most significant challenges facing the proposed project, the DEIR provides scant information on this critical topic. The six-page chapter on Solid and Hazardous Waste provides a very general description of previous site investigations and the contamination found on the site, and concludes with a brief discussion of MCP compliance. The FEIR should provide significantly greater detail about the location and extent of various contaminants, including summary tables, site plans and graphics to provide much greater specificity. Likewise, the proposed strategy and plans for site remediation, including cost estimates as required by the MEPA Certificate on the ENF, should be provided in the FEIR. Finally, the timing of MCP compliance activities with respect to the MEPA review process raises concerns. Site remediation plans should be finalized before the Final EIR is filed. It should not be left as an outstanding unresolved issue when the Secretary issues the Certificate on the FEIR.

D. DEIR ANALYSIS

DEIR Certificate

February 21,2014

CERTIFICATE OF THE SECRETARY OF ENERGY AND ENVIRONMENTAL AFFAIRS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT

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I encourage the Proponent to review the comments received and work in partnership with the City of Everett and other communities to assess and prioritize potential projects at the local level through the Community Mitigation Fund. 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)).

....

The FEIR should include a revised and updated Transportation Study prepared in conformance with the *EEA/MassDOT Guidelines for EIS/IEIR Traffic Impact Assessment*. The project requires extensive modifications to the regional and local roadway network. While the DEIR included a comprehensive Transportation Study, additional data gathering, analysis, and assessment of alternatives and mitigation measures is necessary in the FEIR. The Proponent should meet with MassDOT, Massport, BTD, DCR, the City of Everett and other municipalities prior to completing the revised transportation study.

I hereby incorporate by reference the MassDOT comment letter, dated February 11,2014, into the Scope for the FEIR. This letter, as well as comments from the City of Boston, DCR, MAPC and surrounding municipalities, identifies a number of additional areas requiring further analysis or clarification, including additional capacity analysis, additional mitigation, establishment of mode

share goals, enhancement of the TDM program to meet goals, and the establishment of a transportation monitoring program.

...

MassDOT – DEIR Comment Letter

The Office of Transportation Planning has reviewed the Draft Environmental Impact Report (DEIR) for the Wynn Everett project in Everett. The proposed project entails the development of a 2,619,234 square foot (sf) resort casino to be located on the west side of Route 99 (Broadway), opposite Mystic Street. The proposed development program has been reduced in size since submission of the Environmental Notification Form, and the revised program would include:

- A 500 room (627,073 sf) luxury hotel tower;
- 167,880 sf of gaming space, to include 3,072 slot machines and 150 gaming tables (3,972 total gaming positions);
- 89,140 sf of retail space;
- 57,591 sf of entertainment space, including six restaurants and a nightclub;
- 34,998 sf of meeting facilities for business customers and large groups;
- A 13,110 sf spa and gym;
- A 5,322 sf, four-season winter garden;
- An estimated 310,248 sf of "back-of-house" support space;
- An estimated 57,339 sf of "front-of-house support space," including restroom space and lobby lounge;
- Waterfront features, a harbor walk, and water transportation docking facilities;
- An approximately 2,909-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 railroad tracks owned by the Massachusetts Bay Transportation Authority (MBTA); to the north by the MBTA's Everett Facility; to the east by Route 99, an existing carwash, and the Massachusetts Water Resource Authority (MWRA)/Boston Water & Sewer Commission (BWSC) Treatment Plant; and to the south by the Mystic River. Access to the site would be provided via Horizon Way (now known as Chemical Lane), which currently forms an unsignalized intersection with Route 99. A secondary access for service delivery and employees is provided via a service road that would circulate around the MBTA Everett Shops property and connect with Route 99 across from Beacham Street.

Based on information included in the DEIR, the project at full build is expected to generate approximately 21,552 new vehicle trips on an average weekday and 25,456 new vehicle trips on an average Saturday. The trip generation includes trips associated with employee off-site parking within the study area. The project is categorically included for the preparation of an Environmental Impact Report (EIR).

Project Permitting

The DEIR indicates that the proposed project would require the following MassDOT approvals/permits:

- MBTA Property Agreement;
- MBTA Land Disposition and Easement Agreements;
- Vehicular Access Permit for Off-Site roadway improvements; and
- Airspace Review from the Aeronautics Division.

The section of the Revere Beach Parkway (Route 16) in the project study area (including the segment affected by the proposed reconstruction of Santilli Circle, discussed below) is officially listed in the National Register of Historic Places as one of the nation's historic places worthy of preservation (per the National Historic Preservation Act of 1966). Proposed design changes to Revere Beach Parkway/Santilli Circle would require Federal consultation with the Massachusetts State Historic Preservation Officer (SHPO), pursuant to 36 CFR Part 800, regulations implementing Section 106 of the National Historic Preservation Act of 1966, as amended [16 U.S.C. Part 470(f)], to determine if the proposed design changes would have an adverse effect on that National Register-listed parkway. In addition, the proposed reconstruction of Santilli Circle must be compatible with the MassDOT Woods Memorial Bridge Replacement project, which is located immediately west of Santilli Circle.

The project would require Federal Aviation Administration (FAA) Air Navigation permitting for the casino building/hotel tower and construction cranes. In addition, the project's need for US Army Corps of Engineers (USACE) Sections 404 and 10 Permits will require the proponent to evaluate the project under the National Environmental Policy Act (NEPA). The NEPA process is not mentioned in the DEIR.

For the project's proposed ramp modifications at the intersection of the I-93 Northbound Off-Ramp at Cambridge Street, the project proponent will need to prepare a Project Framework Document (PFD) for review and approval by MassDOT prior to submittal to the Federal Highway Administration (FHWA). The FHWA's Policy on Access to the Interstate System provides the requirements for the justification and documentation necessary to substantiate any proposed changes in access to the Interstate System. Based on the PFD, FHWA would determine whether an Interchange Modification Report (IMR) and/or any subsequent federal actions, including NEPA review, are required.

As project development proceeds, the proponent needs to coordinate with MassDOT, USACE, and FHWA to determine whether FHWA or USACE would be the lead federal agency under NEPA.

In addition, Routes 16 and 99 are roadways included in the National Highway System (NHS); therefore, MassDOT must evaluate, approve, and document any design exceptions. Approving any design exception is a federal action requiring NEPA compliance.

In summary, the following project-related Federal actions would require NEPA compliance:

- USACE Sections 404 and 10 permits;
- FHWA's Policy on Access to the Interstate System; and
- Design Exceptions on an NHS roadway

The lead federal agency for the NEPA process will need to be determined through coordination with the USACE and FHWA by the project proponent with MassDOT participation. If the USACE declares jurisdiction on the project, they would be the lead federal agency. If FHWA declares jurisdiction on the project, they would be the lead federal agency, and the NEPA regulations at 23CFR771 apply. Other regulations that could also apply include the noise regulations, if applicable, (23CFR772) and Section 4(f) (23CFR774). The Section 106 process would be overseen by the lead agency, who would also determine the NEPA Class of Action (Categorical Exclusion, Environmental Assessment, or Environmental Impact Statement).

It should also be noted that the proposed project would result in substantial disturbance to land that was previously part of the Monsanto chemical manufacturing facility. Therefore, soil and groundwater generated during construction would need to be managed in a manner that prevents ecological or human health exposures.

Transportation Impact Assessment (TIA)

The DEIR includes a transportation study prepared in conformance with EOEEA/MassDOT Guidelines for Transportation Impact Assessments. The study includes a comprehensive assessment of the transportation impacts of the project based on a thorough analysis of existing and future conditions. The analysis includes an inventory of existing roadway geometry, daily and peak period traffic counts, crash history, bus transit capacity, and capacity analysis for all intersections in the study area. The TIA also evaluates the transportation impacts of the proposed project based on the trip generation estimates along with future transportation demands due to projected regional traffic growth, independent of the proposed development.

Trip Generation

The overall trip generation calculations for the project are based on the trips that would be generated by each use separately, and then a share-trip credit is assumed among some of the uses. The calculations are based on empirical data for casino, along with calculations based on the Institute of Transportation Engineers (ITE) *Trip Generation Manual* for ITE Land Use Code (LUC) 310 (Hotel) for the hotel, ITE LUC 820 (Shopping Center) for the retail component of the project, and ITE LUC 925 (Drinking Place) for the entertainment component. According to the DEIR Trip Generation Summary table, the project is expected to generate 21,552 net vehicle trips on an average Friday, including 1,743 vehicle trips during the Friday site peak hour, and 25,456 net vehicle trips on an average Saturday, including 2,041 vehicle trips during the Saturday site peak hour. Excluding the employee trips associated with the off-site parking

facilities, the DEIR asserts that the project site is expected to generate 1,484 net primary trips during the Friday site peak hour and 1,750 net vehicle trips during the Saturday site peak hour.

As requested by the MassDOT comment letter on the project's ENF, the DEIR has updated the trip generation summary to show all assumptions. The DEIR also provides information on the size, location, and traffic volumes of the comparable casino sites that were counted to establish a correlation between the number of gaming positions and trip generation. The trip generation was also revised to account for mode share and credits for multi-purpose trips, transit trips, and hotel trips.

The DEIR includes a comprehensive list of comparables that were used to derive trip generation rates for the project. These comparables were selected based on a review of existing casino facilities in North America, including Canada. Based on a more detailed review of similarities with the proposed Wynn Everett casino, the comparables were narrowed down to two: the World Resort Casino at Aqueduct in New York, NY and the Casino de Montreal in Montreal, Quebec. Both sites contain a similar number of gaming positions within acceptable range; they are located in an urban metropolitan area; and they have reasonably good access to the public transit system.

It should be noted that during the overall review process to permit casino resorts, the different applicants for gaming licenses have submitted to MassDOT data collected throughout the country for review and approval of their trip generation rates. Our experiences have revealed that finding an existing casino resort with a combination of similar development program, location, and access to the public transportation system has been challenging. Given the urban context of the project, the commitment to a TDM program, and the ability to uphold the proponent to site trip reduction strategies through monitoring and reporting,

The proponent has also taken credits for internal capture and pass-by trips for the non-gaming component of the project. These credits are significantly below recommended rates in the ITE Trip Generation Handbook. They are also below the 25 percent credit generally accepted as state standard to provide a conservative estimate of the trip generation.

In addition, the project is located within close proximity to the MBTA bus transit system and within reasonable distance of the MBTA Orange Line subway system. The proponent has committed to provide shuttle services that will connect the site with the three nearby MBTA stations to accommodate patrons and employees using the subway system. The proponent has also committed to provide passenger water transport service between the site and key Boston Harbor landing sites. The proponent has also committed to providing pedestrian and bicycle accommodations to connect with existing facilities to ensure multi-modal site access. Based on the availability of the different travel modes, the DEIR has estimated mode share credit for employees and patrons separately. Upon applying all of these assumptions to the trip generation, the project is expected to generate 8,548 person trips on an average Friday and 10,016 person trips on an average Saturday. MassDOT concurs with the methodology used and the projections for travel by the different modes.

MassDOT is generally satisfied with the level of information provided on how the overall trip generation was derived for the project as a whole. However, the FEIR should include more detailed information on the employee demand distribution based on the nature of work shifts. The proponent should evaluate the impacts of instituting different shift schedules around the availability of transit services in order to maximize transit usage by employees.

Trip Distribution

The TIA includes capacity analysis for most of the study area locations based on the critical peak hours. However, the proponent has expressed concerns that this approach may be too conservative and result in over-building the mitigation along Route 99, where the configuration of the roadway network and the location of the project would concentrate most of the traffic. Based on the proponent's analysis, the use of a "critical peak" that adds the project peak hour traffic to the no-build peak hour traffic results in traffic volumes that are approximately 500 vehicle trips higher than the "real" peak hour traffic volumes (i.e. proponent term for the no-build peak hour traffic volumes added to the project-generated traffic from the corresponding hour, rather than from the project's peak generation).

To illustrate this concern, the DEIR includes a comparison of the critical peak hour volumes versus the "real" peak hour volumes for the intersections along the Route 99 corridor. MassDOT generally agrees that the critical peak hour as calculated may overestimate the traffic volumes along Route 99 and result in overbuilding the mitigation program. However, the temporal analysis of casino traffic demand is based on only two comparable sites, which may differ from the ultimate temporal pattern in the project study area. Nevertheless, the analysis based on the "real" peak hour volumes indicates reduced delay and improved overall LOS along the Route 99 corridor, but the proponent suggests no changes to the mitigation program along Route 99.

In addition, it is not clear from the DEIR how many parking spaces would be provided for the additional uses on site. The FEIR should clarify the exact number of parking spaces for employees and explain how the parking demand for the other uses on the site was calculated.

The DEIR indicates that the parking demand would exceed the supply on-site during several peak-demand times. During these periods, the project would employ a valet service to park vehicles at an off-site parking location. The valet service could impede site circulation, create additional site trips not accounted for in the trip generation, and induce alternative parking options for patrons in the vicinity of the site, such as parking on neighborhood streets.

The proponent should further evaluate the proposed parking policies in order to minimize parking demand and automobile use. The FEIR should provide more detailed information on the valet service and how the limitation of parking spaces may impact traffic operations along the corridor. The proponent should implement strong incentives to travel by modes other than automobile (as described below in the section on transportation demand

management). These measures would assist in further site trip reduction in and around the project site.

The parking system should also minimize traffic and environmental impacts through such measures as a limited overall parking supply, preferential parking for carpools and vanpools, electric vehicle charging stations, reserved spaces for car-sharing services, and secure interior bicycle parking.

Traffic Operations

The DEIR presents a comprehensive evaluation of traffic operations that includes a substantial number of intersections within the study area. This includes intersections that had been identified in the ENF, as well as additional intersections and roadway segments that were recommended for inclusion in MassDOT's ENF comment letter. The TIA includes capacity analyses and a summary of 50th and 95th percentile vehicle queues for these intersections. MassDOT has reviewed the traffic impacts of the project on traffic operations in the vicinity of the project, and the proposed mitigation measures to address these potential impacts on state highway locations. Based on the DEIR review, the following concerns should be addressed in the FEIR.

The SYNCHRO analysis results also indicate that, in most cases, queues at these intersections would extend beyond available queue storage space. The FEIR should provide a summary table of the 50th and 95th percentile queues and graphics to allow comparison of projected queues relative to available queue storage space.

. The proponent should be aware that a Road Safety Audit (RSA) will be required in order to assess safety issues and develop mitigation measures for these locations.

With the addition of the site trip generation, several intersections within the study area are expected to experience deteriorating conditions in the Future Build conditions. In addition to several local intersections, the following state highway locations will be adversely impacted as a direct result of the project.

- Sullivan Square (Cambridge Street at its intersections with Maffa Way, Rutherford Avenue and Main Street area) 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;
- The 1-93 Northbound Off-Ramp/Cambridge Street intersection in Boston.

The proponent has identified a mitigation program to address these impacts. Some of the proposed improvements have already been vetted in the local and/or state public process and are currently under planning and design; however, the timing of their implementation is

uncertain. Other improvements will be implemented or funded directly by the proponent. Some of these improvements are further described below.

On- and Off-Site Improvements

The proposed improvements are generally consistent with MassDOT standards, provide for multimodal travel in the study area, and are proposed at key intersections and along critical corridors that provide access to the site. For the most part, the proposed mitigation measures would improve LOS, enhance safety, reduce delay, and improve pedestrian and bicycle circulation. Nevertheless, some intersections and corridors are expected to continue to experience congested conditions, and the proposed improvements will need further refinements. MassDOT has reviewed these improvements and has the following comments that should be addressed in the FEIR.

Sullivan Square

The City of Boston is currently planning an improvement project to address longstanding safety and traffic operational issues in the Sullivan Square area. These improvements would include removing the Route 99 underpass and reconstructing the rotary into a system of at-grade intersections in order to create a more urban, pedestrian-oriented area that would connect the residential neighborhood with the MBTA 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. According to the DEIR, this project is expected to be implemented within the horizon year of the project; therefore, these plans were analyzed as part of the future-build conditions.

As mitigation, the proponent has proposed to provide funding for planning and conceptual design of the City of Boston's preferred alternative design for Sullivan Square and Rutherford Avenue. In addition, 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; interconnection and coordination of this traffic signal with the adjacent traffic signals; installation of 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 widening the Main Street approach to the intersection to provide two approach lanes.

The TIA does not provide any capacity analysis for the proposed interim mitigation plan, so MassDOT could not evaluate how well these changes would temporarily mitigate the project's traffic impacts. The FEIR should include capacity analysis for the interim improvements and provide a summary of delay, volume-to-capacity ratio, and 50th and 95 percentile queues for all the intersections within the traffic circle. The TIA should demonstrate that the queues could be accommodated within available storage, or else these queues could block upstream intersections and potentially impact overall system operations of the network. The FEIR should include a comparison of all queues with the available queue storage distances in order to determine where they may have a critical impact on overall traffic operations. While some of these conditions already exist and the feasibility of providing geometric improvements may be

limited due to right-of-way constraints, MassDOT is concerned about the potential of the traffic circle deficiencies impacting operations at the Cambridge Street northbound approach, which could in turn impact operations of the I-93 northbound off-ramp.

The proponent should also conduct a simulation of traffic operations along the Route 99 corridor as well as some key intersections to support the results of the capacity analysis. The proponent should work with MassDOT on the development and calibration of the simulation model, and get MassDOT's approval prior to generating final results for the FEIR.

Santilli Circle

Santilli Circle is part of Revere Beach Parkway (Route 16) and is under the jurisdiction of the Department of Conservation and Recreation (DCR). To address the poor operations at this location, the proponent has identified conceptual improvements to address both current and projected future operational deficiencies. These improvements would entail the construction of a grade-separated, single-point, urban interchange (SPUI) to replace the existing signalized rotary. The proponent has committed to implement or fund the construction of these improvements.

The DEIR did not address the timing for implementation of these improvements and seems to assume that they will not be in place prior to site occupancy. Consequently, the proponent has committed to interim improvements consisting of signal timing and phasing modifications to the existing traffic signal coordination system and sign and pavement marking upgrades to improve safety and meet current design standards. As with the Sullivan Square interim improvements, the DEIR did not include relevant performance measures to evaluate the conditions at Santilli Circle prior to site occupancy.

It should be noted that the proposed SPUI has not been fully vetted by DCR and MassDOT, and it should not be the only option considered at this location. The FEIR should include a more comprehensive evaluation of alternatives, and the proponent should continue consultation with MassDOT and DCR to address the proposed improvements proposed at this location. The FEIR should include sufficiently detailed conceptual plans (preferably 80-scale) for any proposed roadway improvements in order 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.

Sweetser Circle

The proponent has committed to provide geometric improvements, as well as sign and pavement marking upgrades to address safety and to meet current design standards. In addition, the DEIR assumes that the planned long-term improvements at Santilli Circle would result in a direct improvement to traffic operations within Sweetser Circle. It is not clear from the information provided how this conclusion was derived. The FEIR should provide the appropriate performance measures to demonstrate how Sweetser Circle would benefit from the improvements at Santilli Circle. A simulation of the corridor

based on a software package that is pre-approved by MassDOT would provide a better picture of how the corridor could be improved with all the planned projects.

Wellington Circle

The proponent has committed to fund the study and conceptual design of improvements at this intersection. The project is expected to worsen conditions, and appropriate mitigation should be identified for implementation prior to site occupancy. The FEIR should include a comprehensive traffic operations analysis and an analysis of potential improvement alternatives.

Bell Circle

The proponent has committed to traffic signal equipment, signs and pavement marking upgrades to improve safety and meet current design standards. Again, the DEIR did not include associated performance measures to evaluate these conditions prior to site occupancy. The FEIR should include a comprehensive traffic operations analysis and an analysis of potential improvement alternatives.

I-93 Northbound Off-Ramp/Cambridge Street Intersection

The DEIR Future-Build conditions for the Cambridge Street/Maffa Way intersection indicate that the Cambridge Street northbound through movement would operate at LOSE with queues extending beyond its intersection with the I-93 northbound off-ramp. The recurring queue at this approach could impact ramp operations by creating excessive queuing and delay on the ramp. The draft Section 61 Finding included in the DEIR has proposed mitigation measures to address these conditions. These measures consist of widening the off-ramp approach, upgrading/replacing traffic signal equipment/signs/pavement markings, and optimizing the traffic signal timing, phasing, and coordination. The DEIR did not include any capacity analysis or any conceptual plans to demonstrate the feasibility of these improvements or how they would improve traffic operating conditions at this location. They should be provided in the FEIR and, if approved and deemed feasible by MassDOT, the proponent would be responsible for preparing a Project Framework Document (PFD) for submission to FHWA for the determination of the type of federal actions that would be required to implement these improvements.

In summary, the FEIR should revisit the highway improvements mitigation program to provide a clearer understanding of their 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 or the appropriate jurisdiction as to the feasibility of the proposed improvements prior to committing to their implementation. The FEIR should clearly indicate whether design waivers are required for the proposed improvements, how they would impact the permitting of the projects, and address overall permitting strategies for the project.

Any proposed mitigation within the state highway layout must be consistent with a Complete Streets design approach that provides adequate and safe accommodation for all

roadway users, including pedestrians, bicyclists, and public transit riders. Guidance on Complete Streets design guidelines is included in the MassDOT *Project Development and Design Guide*. Where these criteria cannot be met, the proponent should provide the justification as to the reason why, and should work with the MassDOT Highway Division to obtain a design waiver.

Public Transportation (MBTA)

The MBTA, through MassDOT, provided extensive comments on the ENF for the Wynn Everett project. The DEIR for the project acknowledges those comments, but in many cases the DEIR provides no specific responses to the comments or else provides very limited responses that do not fully address the MBTA's questions.

The DEIR does address, to varying degrees, the MBTA's questions regarding the impact to the Orange Line that may result from the project. However, the DEIR presents very limited information on impacts from the use of shuttle buses on the MBTA stations, and very little information on what type of improvements could be made to the existing bus network to facilitate greater usage of transit to access the project. Most troubling, the DEIR does not address any of the MBTA's questions and requests for information on potential impacts to the critical MBTA facility located directly adjacent to the proposed casino.

Transit Demand and Impacts to the Transit Network

Impacts to Existing Transit Service: The MBTA currently operates extensive rapid transit near the site and bus service directly to the site. The DEIR indicates that it anticipates that 10 percent of all employee trips and 0 percent of customer trips will arrive via the MBTA network. It is important to note that the proponent has identified other services, such as shuttles and water taxi services that will serve both customers and employees. These services are not owned or operated by the MBTA. Given the location of the facility and its relationship to the MBTA network, this assumption appears fairly reasonable. MassDOT believes however, that additional attention paid to a robust TDM program and better coordination with the MBTA could lead to a higher mode split (see comments below on TDM).

The proponent indicates that it is committed to providing a shuttle between the project site and the nearest MBTA station. The project is proximally served by three Orange Line Stations: Wellington Station, Assembly Station¹ and Sullivan Square Station. In its comments on the ENF, MassDOT requested that the DEIR provide information as to how employees and patrons who choose to use the Orange Line will get from the site to the rapid transit station. The proponent has indicated that it will provide a shuttle service from the facility to the Orange Line. While the DEIR does state that Malden Center Station and Wellington Station are possible locations for shuttle pick-up and drop-off, the DEIR presents only the most cursory information as to where that shuttle will operate, using a large scale aerial photograph to identify a very broad location where a shuttle may operate could be located.

The FEIR must 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, the FEIR must include shuttle berthing plans showing how these private shuttles will access the stations. The proponent must take steps to ensure that the berthing areas and shuttle routes at the stations do not interfere with existing MBTA bus routes. The proponent should provide graphics, at an appropriate scale so as to show details, how customers will board these shuttles and how these routes may interfere with MBTA routes. In addition, the proponent should demonstrate, preferably with graphics, what the accessible path of travel will 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), the Massachusetts Architectural Access Board (MAAB) along with the Federal Transit Administration (FTA) regulations and guidance. The proponent should present in the FEIR what the existing conditions are and how those conditions should be upgraded/improved so as to ensure a fully accessible path of travel for all of the customers. These comments were specifically raised in the MassDOT comment letter on the ENF, yet none of this information was provided in the DEIR.

The MBTA is interested in working with the proponent to develop transportation plans that would allow for the project to take advantage of its close proximity to an extensive transit network while at the same time recognizing the inherent limitations of the transit system and the MBTA's capacity constraints.

Assembly Station is currently in construction and is anticipated to be open for passenger service in the spring of 2014, well before the proposed opening of the Wynn Everett facility.

Impacts to MBTA Bus Service: In its comment letter on the ENF, MassDOT asked to see a detailed presentation of the impact to the MBTA bus network; specifically, the MBTA asked that the DEIR present the future Build condition demand for the #104, #105 and #109 buses and how it compares to the Future No Build condition demand for local bus services. The DEIR appears to adequately assess these impacts.

In its comment letter on the ENF, MassDOT asked that the DEIR present, preferably in graphic format, what the path of travel is from the existing MBTA bus stops along Broadway to the facility. To determine how this facility can be served by the bus network, it is critical that the MBTA understand how customers or employees using the bus network will get from the stop to the complex, with an emphasis on how pedestrians will cross Broadway to access bus stops. MassDOT requested that the DEIR show how pedestrian crossings and bus stops can be coordinated to ensure safe, accessible travel for bus customers. The DEIR indicates that it is interested in working with the MBTA to enhance the bus stops on Broadway, but provides no specific plans or proposals. The proponent needs to present bus enhancement proposals in the FEIR so that the MBTA can assess whether these plans will address the transit, safety and accessibility needs of our customers. The proponent expresses a willingness to discuss these issues with the MBTA to establish an appropriate bus connection. The proponent should initiate these conversations with the MBTA immediately so that a specific proposal can be shown in the FEIR.

In addition, the FEIR should specifically address what the impacts to MBTA bus service would be due to traffic generated by the project. The FEIR should provide a Turning Movement analysis and a LOS analysis for all affected intersections. The FEIR should also

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.

Employee Related Transportation Demand Programs CTDM): The DEIR identifies the types of TDM programs that will be implemented. While these measures will serve to encourage guests and employees to use transit to the greatest degree possible, the proponent should develop a more robust TOM program, particularly for employees, since it is employees who will primarily use transit to access the facility. In its comment letter on the ENF, MassDOT requested that the DEIR identify how shifts will be scheduled so that all three shifts can utilize transit. Employees who work a second or third shift can generally rely on the transit service if the second or third shifts begin/end between 6 AM- midnight (except Sundays 7 AM-midnight). This would allow employees coming off of a second shift or doing an overnight shift to use transit, even though transit ceases to operate overnight. The FEIR should describe how shifts will be laid out, and how tenants and vendors at the facility will be encouraged to schedule shifts as well so as to promote transit usage as much as possible, while also being mindful to avoid scheduling shifts so that they add to the weekday rush hour conditions noted above.

The DEIR indicates that employee shuttles from remote locations will be used to allow employees to park and take shuttle buses to the facility. The proponent should work with the MBTA on the potential for joint usage of MBTA parking facilities such as the Lynn parking garage, Wellington Station, Anderson Intermodal Facility in Woburn or other remote locations. The proponent should work with the MBTA Parking Department to identify appropriate remote locations where a shared usage agreement could be arranged.

Facility Impacts with the MBTA Everett Facilities

MassDOT is concerned that the DEIR does not address the project's potential impacts to the MBTA's Everett Facility, which is directly adjacent to the proposed casino and resort facility. The facility (frequently referred to as the Everett Shops), is an approximately twenty-five (25) acre site that houses the MBTA's Bus Repair Facility and the Subway Main Repair, which serves all of the subway operations. Also included in this campus is the MBTA Central Stores Building, which is the MBTA's materials control center that houses all materials used by the MBTA to operate and maintain trains. The Everett Central Stores accepts deliveries of all materials used throughout the bus and subway system. Its activities are a key component supporting MBTA services.

As currently envisioned, the project would require acquisition of permanent property rights from the MBTA. The proponent is seeking to build the main casino entrance from Broadway across the southeast corner of the site. This access road would overlap with the existing main secure entrance to the MBTA campus, thus requiring that the MBTA facility entrance be relocated. This relocation would change the orientation and the usage of the site since all employee and truck deliveries are made through this gated entrance. In its comments on the ENF, MassDOT raised a series of specific comments seeking information about how this reorientation would affect the operations of the facility, but the DEIR provides no discussion at all about these impacts. MassDOT feels it is critical that this information be laid out explicitly and with sufficient detail in the FEIR so that the MBTA can assess whether or

not this proposal will adversely affect critical transit operations, and how these impacts could be mitigated.

Additionally, the proponent is interested in acquiring several acres of property from the MBTA that is currently used as a bus storage area (for buses that will be fixed or repaired in the bus maintenance building). From the graphics provided in the DEIR, it is difficult to determine exactly how much land is needed by the proponent. The FEIR should clearly articulate all interests in real estate, including size and location, that the proponent will need from the MBTA.

In its ENF comment letter, MassDOT requested that the DEIR portray how vehicles, particularly delivery trucks as well as MBTA buses, will access the site and the building, including necessary information on turning radii of the types of vehicles that the MBTA expects to service at the site. Since this information was not presented in the DEIR, it is critical that it be presented in the FEIR.

Access to and Across the Everett Facility: As noted above, in addition to the potential impacts to the MBTA transit network, the proposed project would be located directly adjacent to a major MBTA complex that is an industrial activity site operating 18 hours per day, five days a week, and intermittently on the weekends. This facility provides activities that are critical to the support of MBTA operations: Transit activity in the region cannot exist without the activities that take place at the Everett site. Currently, approximately 300 MBTA employees work at the Everett Facilities. In its comments on the ENF, the MBTA raised a series of comments regarding what the potential impacts to this facility would be and how the project would be designed to avoid, minimize or mitigate potential impacts to this critical transit function. While the Response to Comments indicates that this issue is addressed in Chapter 4 (Transportation), the DEIR makes no reference to this issue at all.

The DEIR shows a new access roadway that will service both the MBTA as well as acting as the Service Road into the proponent's site. In its ENF comment letter, MassDOT asked that the EIR identify in graphic format how this new entrance way would function, with a particular emphasis on ensuring that delivery vehicles as well as employees can safely enter and exit the site. Information was also requested about how employees will safely move across the site from the new Central Stores Facility. While the DEIR provides information on the traffic counts and signal queues anticipated at the intersection of this new roadway and Broadway, the DEIR does not provide information on how the roadway would function and how it would be designed to accommodate the specific needs of the MBTA. In fact, the only information presented showed very rudimentary arrows showing where MBTA vehicles would enter and exit, but no specific design information.

MassDOT asked that the DEIR examine whether the entrance roadway can be made wide enough so that the access to the MBTA facility is segregated from vehicles headed to the Wynn Everett Service Road. The MBTA feels that for operations, safety and security reasons, the roadway would work best if it was fully segregated from all other traffic. There appears to be sufficient land available for a wide roadway. MassDOT continues to feel that the FEIR should present alternatives to see if a dual/segregated roadway can be accommodated.

In addition, the creation of the new Service Road that utilizes MBTA property and wraps around the back of the Everett Facility (between the Everett Facility and the existing commuter rail right of way) drastically alters the functionality and usage of the site for the MBTA. Currently, MBTA buses and trucks delivering goods and equipment enter the site through the existing entrance off of Broadway at the southern end of the site. The project proposal would convert this location to the main access point for the casino complex, and would relocate access for the MBTA Everett Facility and casino service to the northern end of the site.

This change would dramatically alter the dynamics and the functionality of the Everett Facilities. All trucks and buses would have to enter at the northern end of the site. The facility is currently laid out so that the loading docks, which are on the western and southern edges of the building, are accessed from the south. The proponent must analyze how these trucks and buses would access the loading docks, and if any alternations would need to be made to the site. This challenge is exacerbated by the addition of the Service Road, which creates a significant pinch point in the northwest corner of the building and reduces the amount of space leading directly into the western loading docks.

At the time of the ENF, the proponent was considering building a new facility for the MBTA slightly north of its current location. The problems resulting from the changes in the entrances could have been resolved by designing a new building that works on the new parcel. Since that time, however, the proponent has determined that a new MBTA facility is either not feasible or not warranted.

The DEIR includes no assessment or discussion of how the MBTA facility would function under these new constraints. Therefore, the FEIR must address the following issues:

- How would MBTA buses as well as delivery trucks access the site from the new entrance and with the new Service Road in place? An analysis should be provided 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.
- The MBTA also has access to the site through the "backdoor" - a small roadway entrance to the northern end of the site. While this is primarily used by some employees and small vehicles, it serves the critical purpose of being a secondary means of egress from the site in the event of an emergency. This entrance is now located directly adjacent to the proposed new roadway. The MBTA is concerned that this new configuration would result in an unsafe condition since both egress points will essentially be adjacent to each other and as such, there will be no remote secondary means of access.

The FEIR needs to present how this facility would function, including turning movements, vehicle access and safety considerations, if the proponent were to make the type of changes to the property as presented in the DEIR. The proponent should work with MBTA Operations as soon as possible so as to provide enough time to present this information in the FEIR. The proponent must clearly demonstrate the feasibility and benefit of the project and site

reconfiguration to the MBTA. If there is any doubt as to the MBTA's ability to service and maintain its system with no temporary or permanent diminishment of effectiveness, a property transfer to the proponent would not be executed and the access scheme proposed in the DEIR would need to be totally revamped.

Pedestrian Access

The DEIR indicates that the project would provide pedestrian improvements to increase pedestrian safety and accessibility at a number of intersections and along roadways near the project area. These improvements would generally include pedestrian signal equipment, ADA compliant accessible ramps, sidewalk construction, and other pedestrian amenities. These improvements are generally centered along the Route 99 corridor. Given the multimodal nature of the project and the urban context of its location, MassDOT believes that the scope of the pedestrian improvements should be expanded to include additional intersections within walking distance of the project, especially those providing connections to nearby Orange Line Stations.

In the ENF comment letter, MassDOT requested that the DEIR provide a thorough inventory of all existing, planned, and proposed services, facilities, and routes for accessing the site. The FEIR should provide a more detailed pedestrian plan that identifies the existing pedestrian infrastructure and highlights the proposed improvements. The conceptual plans should preferably be 80-scale in order to verify the feasibility of constructing such improvements. The conceptual plans should clearly show proposed lane widths and offsets, layout lines and jurisdictions, and the land uses (including access drives) adjacent to areas where improvements are proposed. Bicycle Access.

The DEIR proposes improvements to the existing bicycle network within the vicinity of the project. The DEIR did not include the level of detailed information and analysis on bicycle facilities and access that was requested; however, the proponent has proposed a comprehensive program for improving bicycle access to the site. These accommodations would entail enhancements to the Lower Broadway corridor, extension of the DCR Mystic River Parkway to 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, bicycle and pedestrian route maps, and showers and lockers for employees to further encourage walking or bicycling to and from work. Some of these accommodations need to be further described, and more details provided as to the feasibility of their implementation and the proponent's commitment to ensure the sustainability of these measures.

As with the proposed pedestrian improvements, the FEIR should provide conceptual plans (preferably 80-scale) for any proposed improvements to bicycle facilities in order to verify the feasibility of constructing such improvements. The conceptual plans should clearly show proposed lane widths and offsets, layout lines and jurisdictions, locations of bicycle racks, and the land uses (including access drives) adjacent to areas where improvements are proposed. For example, the bicycle plan provided did not include sufficient details to ascertain whether they meet the design standards described in our comment letter and required by MassDOT's design guidelines. Transportation Demand Management (TDM)

The DEIR includes a revised Transportation Demand Management (TDM) program that is generally responsive to MassDOT's comments on the ENF. The TDM plan includes commitments to a wide range of measures aimed at reducing trip generation 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 should address in greater detail the specifics of some of the TDM measures to be implemented, especially those designed to ensure that patrons and employees use transit to the greatest degree possible. Specifically, the FEIR should describe how shifts will be scheduled so that as many employees as possible can utilize transit. The FEIR should provide more detail in order to demonstrate how the project would reach the non-single occupant vehicle usage projections expected to reduce site generation. The proponent is reminded that MassDOT concurrence with the trip generation rate for the project was partially based on the opportunity for multimodal transportation afforded to the site due to its urban location. Therefore, the proponent should be very specific on the incentive programs that would attract both casino patrons and employees to use other modes. The FEIR should clearly report on their plan to provide transit incentives for employees to use the MBTA system.

The proponent has committed to hiring a full-time, dedicated Transportation Coordinator who will oversee, promote, and implement the full TDM program. MassDOT recommends that the proponent develop a strong incentive program that would encourage both casino patrons and employees to take advantage of the various automobile travel reduction initiatives. This should include financial incentives to encourage employees or customers to walk, bicycle, use water transportation or ride public transit to/from the site.

The Transportation Coordinator should work closely with MassDOT and MassRIDES, the Commonwealth's travel options service, in order to develop the details of the TOM program and its implementation. The proponent has committed to encourage ridesharing through the promotion of NuRide, the Commonwealth's web-based trip planning and ridematching service that enables participants to earn rewards for taking "green" trips. The proponent should continue its active coordination with MassRIDES, which is expected to play a key role on behalf of MassDOT in advising and monitoring the full range of TDM proposals to be implemented by the proponent, and how the TDM program will be incorporated into the operations of the facility. The FEIR should propose a template for cataloguing, tracking, and evaluating the effectiveness of the various TDM measures during facility operations so that they can be regularly reviewed and updated as appropriate.

Aviation (Aeronautics)

The project 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.

Transportation Monitoring 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 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.

The proponent should continue consultation with appropriate MassDOT Divisions, including the Office of Transportation Planning, the Highway Division, DCR, Aeronautics, and the MBTA during the preparation of the FEIR for the project. If you have any questions regarding these comments, please contact me at (857) 368-8862.

DCR – DEIR COMMENT LETTER

The Department of Conservation and Recreation ("DCR" or "Department") is pleased to submit the following comments in response to the Draft Environmental Impact Report ("DEIR") submitted by Wynn MA LLC (the "Proponent") for the Wynn Everett project (the "Project").

As described in the DEIR, the Project proposes construction and operation of a Category 1 gaming establishment, contingent upon receiving a gaming license from the Commonwealth of Massachusetts. The Proponent submitted an Expanded Environmental Notification Form ("EENF") in July 2013. The DEIR states that minor modifications were made to the building program, compared to that presented in the EENF, although the total height of the main hotel tower is proposed to increase from 300 to 386 feet. The Project is proposed on a 32.4-acre site (the "Site") that fronts the Mystic River and is adjacent to a 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). A Construction and Access Permit will be required from DCR for proposed alterations to DCR roadways.

DCR owns and operates transportation infrastructure (parkways, traffic circles) in the vicinity of the Project Site, including Mystic Valley Parkway (including Wellington Circle), Revere Beach Parkway (including Santilli Circle), the Fellsway and Mystic Valley Parkway. 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 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 transportation impacts of the proposed Project.

As stated in the DEIR, the Proponent proposes to build a grade-separated interchange to replace Santilli Circle. To date, DCR has not been contacted by the Proponent regarding conceptual development or design of this grade-separated interchange. The Department further notes that the interchange's conceptual design as presented in the DEIR assumes implementation of MassDOT's proposed plan for reconstruction of the Woods Memorial Bridge (MEPA #15001). From the Department's perspective, outstanding issues remain regarding the Woods Memorial Bridge project, as the resulting design of the affected portion of Revere Beach Parkway is not compatible with DCR Parkway standards. Furthermore, ultimate jurisdiction of the parkway and its bridges needs to be clarified before meaningful review and comment can be made on these proposed improvements. DCR further notes that these jurisdictional issues were raised in the Department's comments on the EENF. During the MEPA process, DCR requests that the Proponent clearly articulate whether MassDOT or DCR standards were used in developing proposed modifications to DCR roadways.

In the DEIR, the Proponent commits to funding a study and conceptual design of improvements to address operational deficiencies at Wellington Circle. DCR notes that study and conceptual design alternatives must be coordinated with DCR. During the MEPA process, DCR requests that the Proponent conduct a study and develop conceptual design alternatives that can be reviewed in coordination with the Department.

E. CONSULTANT ANALYSIS

GREEN ANALYSIS

In response to the Massachusetts Gaming Commission’s (MGC) request, Green International Affiliates, Inc. (Green) has undertaken an evaluation of petitions by communities requesting to be designated as a *Surrounding Community* with respect to the casino proposals. As part of the development of casinos in Massachusetts, a community may be designated as a *Surrounding Community* in accordance with 250 CMR 125.00. The regulation specifies a number of considerations or factors to guide the determination of the designation and one of them includes various traffic related impact factors. A number of communities have petitioned the MGC requesting *Surrounding Community* designation. The petitions that were received in relation to the proposed Wynn Everett Casino and Resort (Wynn Everett) in Everett and remain in the review process include the following communities: Saugus and Cambridge. This memorandum summarizes the Green’s review of traffic related factors to Cambridge.

General Evaluation Process

Regulation 250 CMR 125.00 identifies various impact factors related to transportation and traffic that need to be considered in an evaluation. These impact factors include:

- Ready Access – This impact factor looks at the physical link between the site and the community, as well as the approximate distance from the site to the center of the community.

- Projected Changes in Level of Service (LOS) – This impact factor defines the operating condition of a roadway or intersection from a traffic perspective. The levels range from LOS ‘A’ to LOS ‘F’ with the highest level (LOS ‘A’) indicating minimal or short motorist delays to the lower levels (LOS ‘E’ and LOS ‘F’) indicating very long motorist delays & potential capacity constraints. A change from one LOS to another does not necessarily signify a traffic related problem, but roadways and intersections with a LOS ‘E’ or LOS ‘F’ are considered problematic and require further investigation. Most review agencies require that Private Developers try to mitigate their project impacts as seen by drops in LOS, particularly when reaching the lower levels of service and exhibiting congested conditions.

- Increased Traffic Volumes on Local Streets – This impact factor examines the level of traffic volume increases that are estimated to occur on local streets due to the project. For this factor, “local streets would consider both non-interstate and interstate highways, state highways, and major collector roads that pass through the community.

- Transportation Infrastructure – This impact factor considers degradation of infrastructure, in particular the condition of roadway pavement, as a result of the project from an increased number of vehicles and/or the increased weight of vehicles (i.e. truck traffic during construction and from deliveries after construction).

Peak Vehicle Trips Generated on State and Federal Highways – This impact factor will identify the estimated casino related traffic that is expected to be added onto State and Federal highways that would also be located in the potentially affected community.

Impacts on Transit Ridership and Station Parking – This factor considers the increased transit use as a result of the project and its impacts on the current service in the community.

In relation to the anticipated degradation of infrastructure, the potential likelihood of construction related traffic using the roadway system located in the community petitioning for designation was ascertained as it is the heavier construction type vehicles that could affect the condition of road infrastructure.

In reviewing the factors described above relative to a proposed casino and its potential impacts to a subject community, information provided by the Applicant is initially reviewed. It should be noted that the Applicant’s initial traffic study may not extend into adjacent communities that are seeking Surrounding Community status. In those situations, we completed additional research relative to traffic levels, relative safety conditions, connectivity, and potential level of impact in the subject community. If available, written reviews completed by regional planning agencies (RPAs) and MassDOT (through the MEPA process) as they relate to the subject community were also taken into account.

While the above impact factors do not specifically cite safety, the issue of additional emergency response that may be required from a potential increase in vehicle crashes attributable to increased casino traffic has been raised in several petitions. Traffic studies typically predict changes in LOS and recommend safety improvements to reduce the chance of future accidents, but it is difficult at best crash occurrences. However, a review of historical crash information either through the RPA, MassDOT records or other sources can be completed for the potential route(s) located in a particular community. Travel routes or locations that have been identified as a safety concern by the petitioning community have been considered in this review.

Petitioning Community: Cambridge

The City of Cambridge has submitted a petition to be designated as a “Surrounding Community” with respect to the proposed Wynn Casino located in Everett. The following summarizes our review with respect to the above factors.

Applicant Traffic Study

The Applicant (Wynn) has submitted a traffic study by their consultants, RD Vanasse & Associates Inc. (VAI) and Howard/Stein-Hudson Associates, Inc. (HSH) that provided their assessment of traffic conditions resulting from the proposed casino. The study was included as Chapter 4 of the applicants Draft Environmental Impact Report (DEIR) to MEPA that is part of the State’s environmental study process.

MassDOT Comments

Comment letters and memoranda prepared by MassDOT were reviewed to obtain any further insights or concerns related to the proposed casino and the impact on Cambridge.

MassDOT comments to date have been in relation to the ENF filed by the Applicant. At this point, MassDOT comments are generally addressed in the Draft EIR. There are some concerns relative to traffic operations and particular impacts; however, none of these comments are related to the City of Cambridge. In its comment letter, MassDOT focused on Routes 16, 99, 28, 38 and I-93 as well as the Applicant's forecasting methods. MassDOT did not mention any potential concern relative to Memorial Drive, I-90 and Route 16 in the City of Cambridge nor did they requested Applicant to include these roadways in any subsequent studies. Memorial Drive and Route 16 are state roadways owned and controlled by the Department of Conservation and Recreation (DCR).

GREEN Analysis

As part of the Green analysis, information contained in the DEIR as well as information available through MassDOT were used to analyze the data in relation to the above mentioned General Evaluation Process factors, as required by the Regulations (205 CMR 125.00).

The proposed casino in Everett is to be located on Horizon Way off Broadway (Route 99) in Everett, proximate to I-93 and Route 16. The proposed casino access and egress is generally convenient to the entrance/exits to/from I-93 and Route 16. The proposed casino and resort project, in total, is estimated to generate between 20,200 and 24,100 net vehicle trips onto the roadway system over the course of a day on Friday and Saturday respectively. The respective peak hour estimates are between 1,680 and 1,980 vehicle trips. A large proportion of the estimated project traffic is expected to use the major highways in the region (I-93, MA-16). As part of the forecasts, it is estimated that approximately 51% of the project traffic will be travelling to/from the south direction. Of this 51%, 37% are expected to use I -93 and 14% are expected to use North Washington Street to and from downtown Boston (and Logan Airport). The DEIR uses a market study (conducted by TMG consulting) for all six New England states, New York, New Jersey and Pennsylvania for trip distribution. The market study uses the patron market information based on 1) the regional and local roadway system serving the project site, 2) existing traffic patterns and 3) the most direct travel routes to the project from major transportation terminals.

The major roadways serving the proposed casino sites through the City of Cambridge are Route 16 and Memorial Drive. The Applicant's traffic study indicated that 5% of the total trips start and end at Route 16 in Medford. However, it is expected that this traffic is travelling from MA Route 2, which connects to Route 16 at Alewife in the City of Cambridge. The Alewife intersection in Cambridge is a major intersection from which the intersecting roadways connect to various communities around the Boston area. This intersection experiences substantially long backups during peak hours and also experiences some backups during off-peak hours. Assuming that all of the trips on Route 16 in Medford originate from Route 2 (and travel through the

Alewife intersection), this will likely add between 1000 to 1200 casino related vehicle trips per day, resulting in an additional 85 to 100 casino related vehicle trips during peak hours. It is expected that this level of additional traffic would negatively impact the traffic operations of the Alewife intersection. Similarly, the estimated 5 % traffic on Route 16 will travel through the intersection of Alewife Brook Parkway and Massachusetts Avenue. This intersection ranks number 110 in the 2011 Top Crash Locations Report (published by MassDOT in September 2013). Similar to the Alewife intersection, the Alewife Brook Parkway and Massachusetts Avenue intersection also experiences substantial backups on all its approaches during peak periods. These intersections require further analysis to determine the actual additional impacts due to proposed additional casino trips.

The Applicant's traffic study indicates that about 37% of casino trips will travel from I-93 in the southerly direction. However, it is expected that a large volume of this traffic will be travelling from I-90 Massachusetts Turnpike (Mass Pike). The Mass Pike is a toll roadway that connects Boston with communities to the west. Based on the existing traffic patterns in this area, a significant number of vehicles exit the Mass Pike at the Allston/Brighton/Cambridge exit to access destinations in the greater Boston area. Similarly, the Applicant's traffic study shows that more than 80% of casino patrons are expected to travel less than 1 hour. Furthermore, 69% of the total patrons are expected to travel less than 30 minutes. This indicates that a large number of patrons will be travelling from the local area and are expected to be familiar with the local roadway network. For these reasons, it can be reasonably expected that Wynn Everett casino patrons who access the casino site from the Mass Pike, would likely exit at the Allston/Brighton/Cambridge, and would likely use Memorial Drive. In addition, local communities like Watertown and Waltham are likely to use Memorial Drive in the City of Cambridge to avoid tolls on the Mass Pike.

Green also reviewed the MassDOT crash data and historical traffic volume data at four intersections:

- Route 2 / Alewife Brook Parkway
- Massachusetts Avenue / Alewife Brook Parkway
- Memorial Drive /River Street
- Edwin H Land Boulevard / Monsignor O'Brien Highway (Route 28)

The following summarizes our analysis relating to the factors within 250 CMR 125.00 which are considered to determine Surrounding Community Designation:

- Ready Access – The proposed casino site is situated approximately 5 miles from the center of Cambridge. Route 16 and Memorial Drive will provide major routes through Cambridge to access the proposed Wynn-Everett casino. Neither Route 16 nor Memorial Drive provides a direct connection to the casino site.

Projected Changes in Level of Service (LOS) – There was no analysis done or required as part of the Applicant traffic studies for the Cambridge roadways/intersections except the intersection Monsignor O’Brien Highway (Route 28) at the Edwin H Land Blvd.

Increased Traffic Volumes on Local Streets – As noted above, the casino related traffic in Cambridge is at most 200 vehicle trips during the peak hours on Memorial Drive and 100 vehicle trips on Route 16 through Cambridge

DEWBERRY ENGINEERS INC. ANALYSIS

We also acknowledge receiving several documents related to this assessment after Green’s memo was prepared on February 12th. These documents are listed below:

- February 11, 2014 letter from Mr. John P. Murray, Commissioner of the MA Department of Conservation and Recreation (DCR) to Secretary Richard K. Sullivan, Executive Office of MA Energy and Environmental Affairs
- February 11, 2014 letter from Mr. Clinton Bench, Deputy Executive Director of the Office of Transportation Planning, MassDOT to Secretary Richard K. Sullivan, Executive Office of MA Energy and Environmental Affairs
- February 21, 2014 Certificate of the Secretary of Energy and Environmental Affairs on the Draft Environmental Impact Report, which was signed by Secretary Richard K. Sullivan, Jr.
- March 14, 2014 Surrounding Community Petition Analysis for the City of Cambridge (Draft), which was prepared by the MA Gaming Commission.

Dewberry reviewed the contents of the above documents and determined that they do not affect our evaluation of the work completed by Green or their conclusions relating to recommendations for Cambridge’s petition for Surrounding Community status.

The following notes present our assessment of the work completed by Green.

General Evaluation Process

The impact factors specified in Regulation 250 CMR 125.00 relating to transportation and traffic impacts by the Project were properly cited, along with the manner by which each factor is to be evaluated. The specific impact factors include-

- Ready Access
- Projected Changes in Level of Service (LOS)
- Increased Traffic Volumes on Local Streets
- Transportation Infrastructure; Significant Peak Vehicle Trips Generated on State and Federal Highway
- Adverse Impacts on Transit Ridership and Station Parking.
-

Applicant (Wynn) Traffic Study

Reference is made to Chapter 4 “Transportation” of the Draft Environmental Impact Report (DEIR) dated 12/16/2013. This chapter was prepared by RD Vanasse & Associates Inc. and Howard/Stein-Hudson Associates, Inc. and presents the traffic impacts on the study area road network by trips generated by the Wynn Everett Casino.

MassDOT Comments

Green Analysis

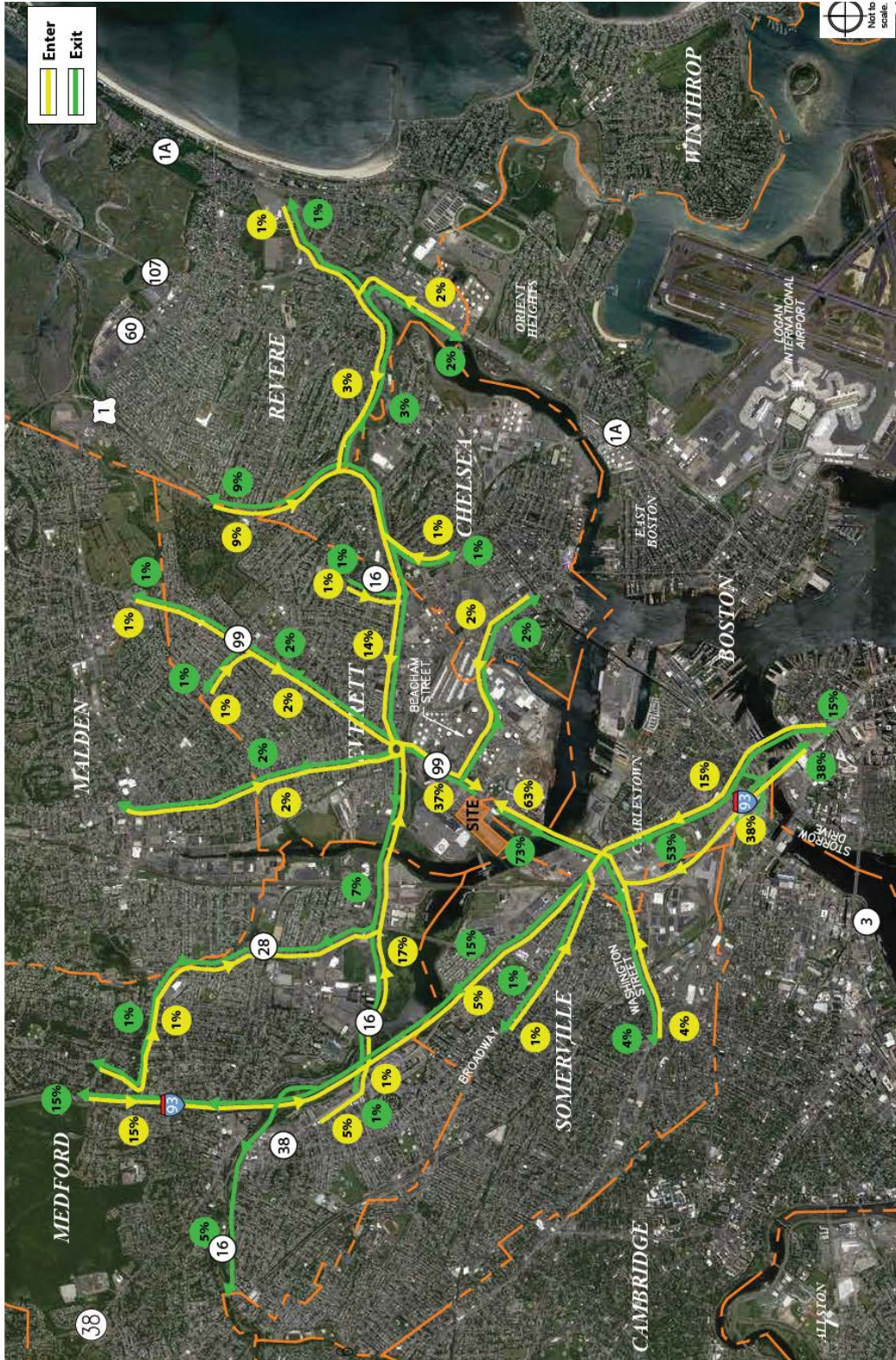
Tables 4-15 and 4-17 that Green used provide the breakdown of trips by travel mode, which yields a lower set of traffic volumes by comparison. A summary of the volume differences are presented in the following table.

Trips Generated by Wynn Everett		Green	Dewberry
Friday	Daily Volumes	20,200 VPD	22,128 VPD
	Peak Hour Volumes	1,680 VPH	1,708 VPH
Saturday	Daily Volumes	24,100 VPH	26,032 VPD
	Peak Hour Volumes	1,980 VPH	2,063 VPH

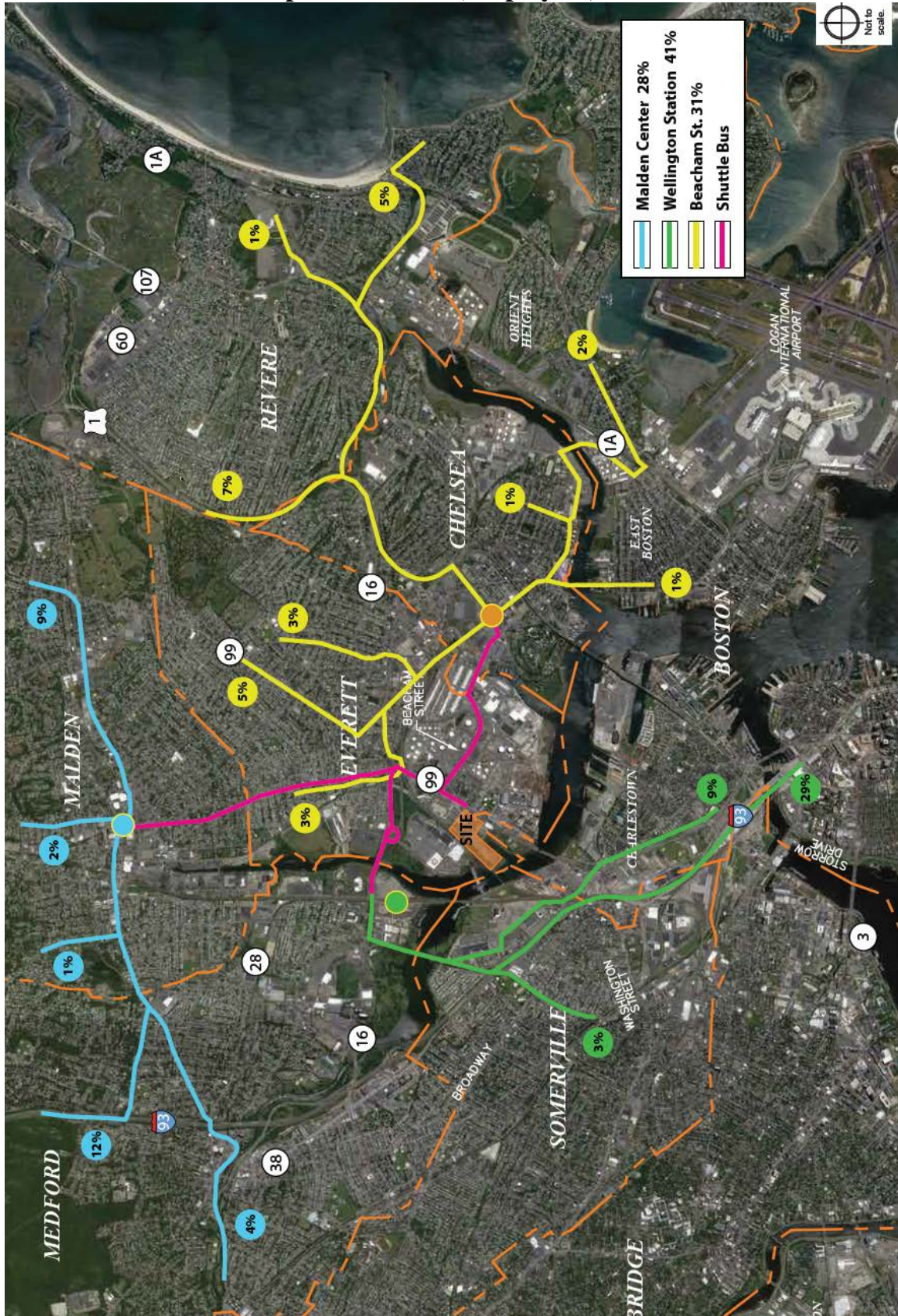
Dewberry Review of Green’s Assessment of Impact Factors

F. APPLICATION

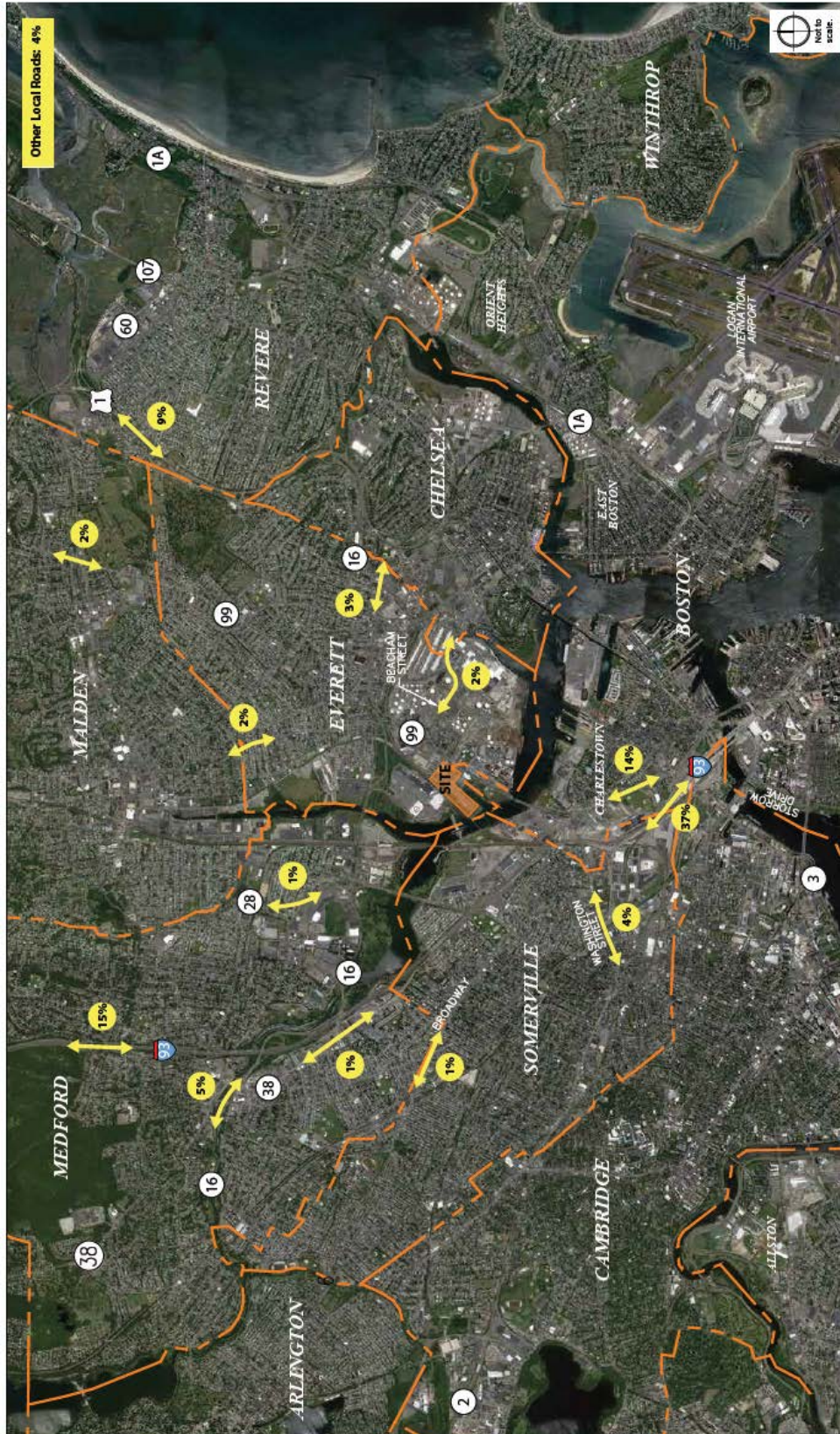
Trip Distribution (Patrons) 4-23



Trip Distribution (Employees) 4-23



Composite Trip Distribution (4-23)



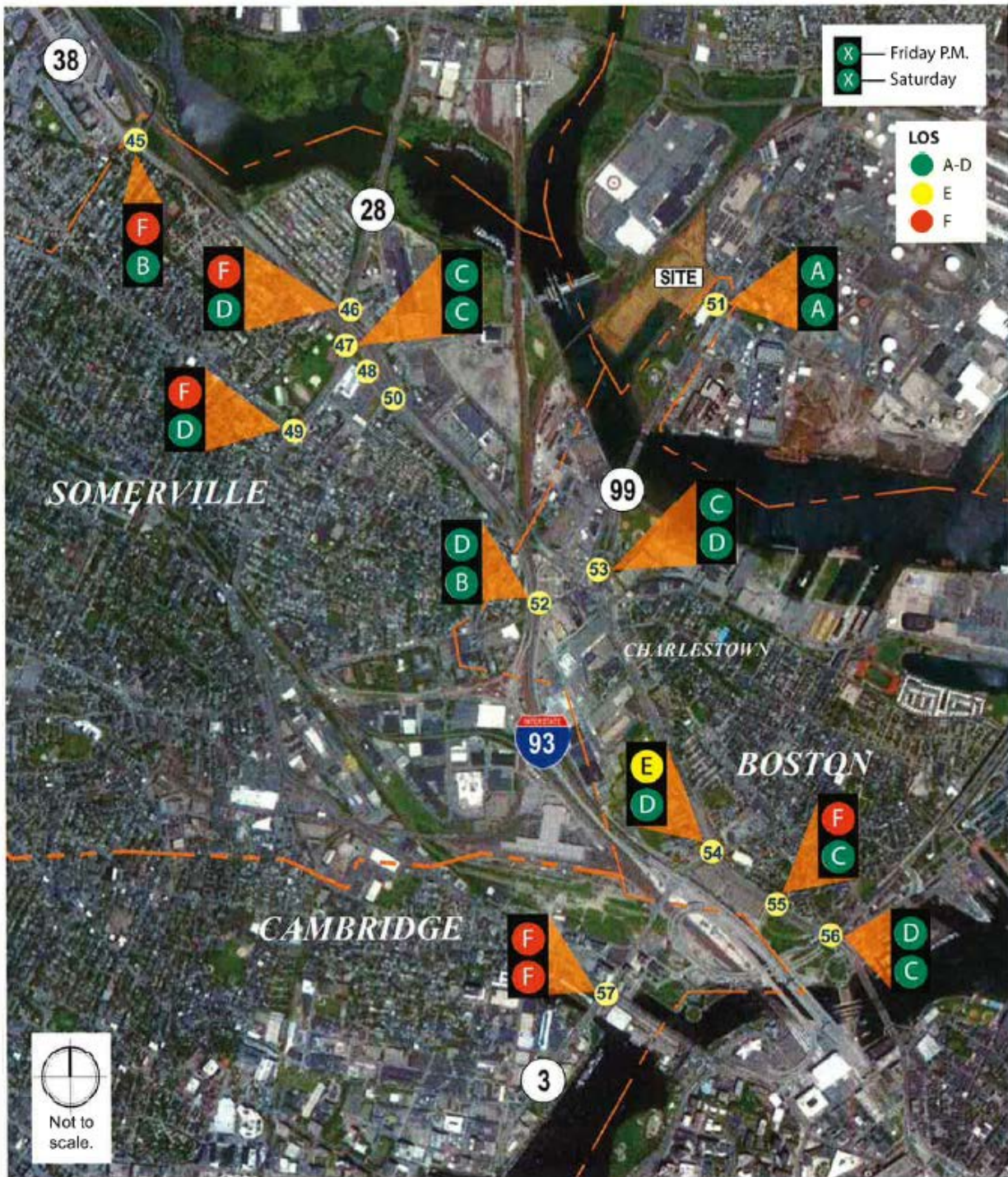


Figure 4-14, Existing (2013) Peak Hour Capacity Analysis Summary, Somerville, Boston, and Cambridge. Source: Howard/Stein-Hudson Associates, Inc.

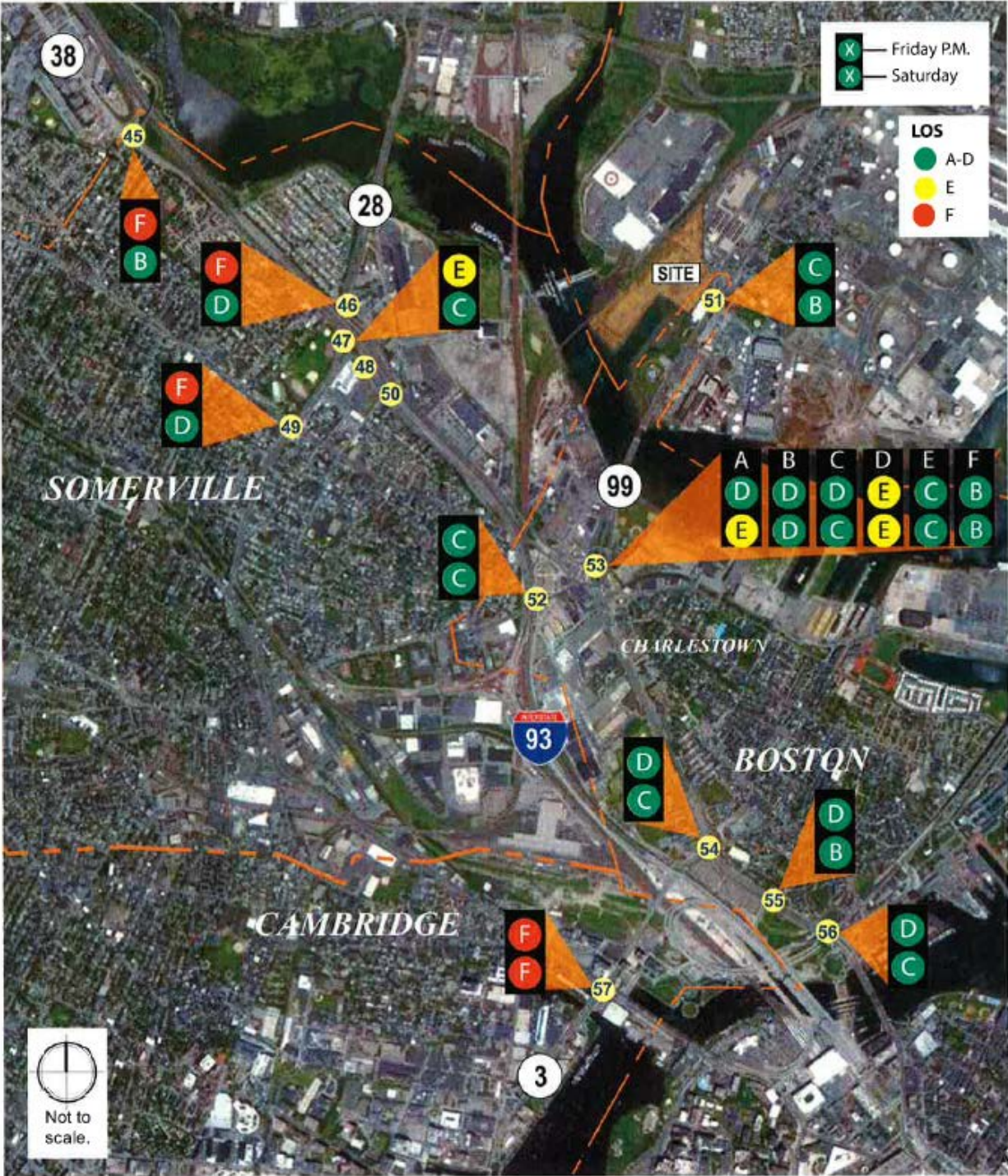


Figure 4-17, Build (2023) Peak Hour Capacity Analysis Summary, Somerville, Boston and Cambridge. Source: Howard/Stein-Hudson Associates, Inc.

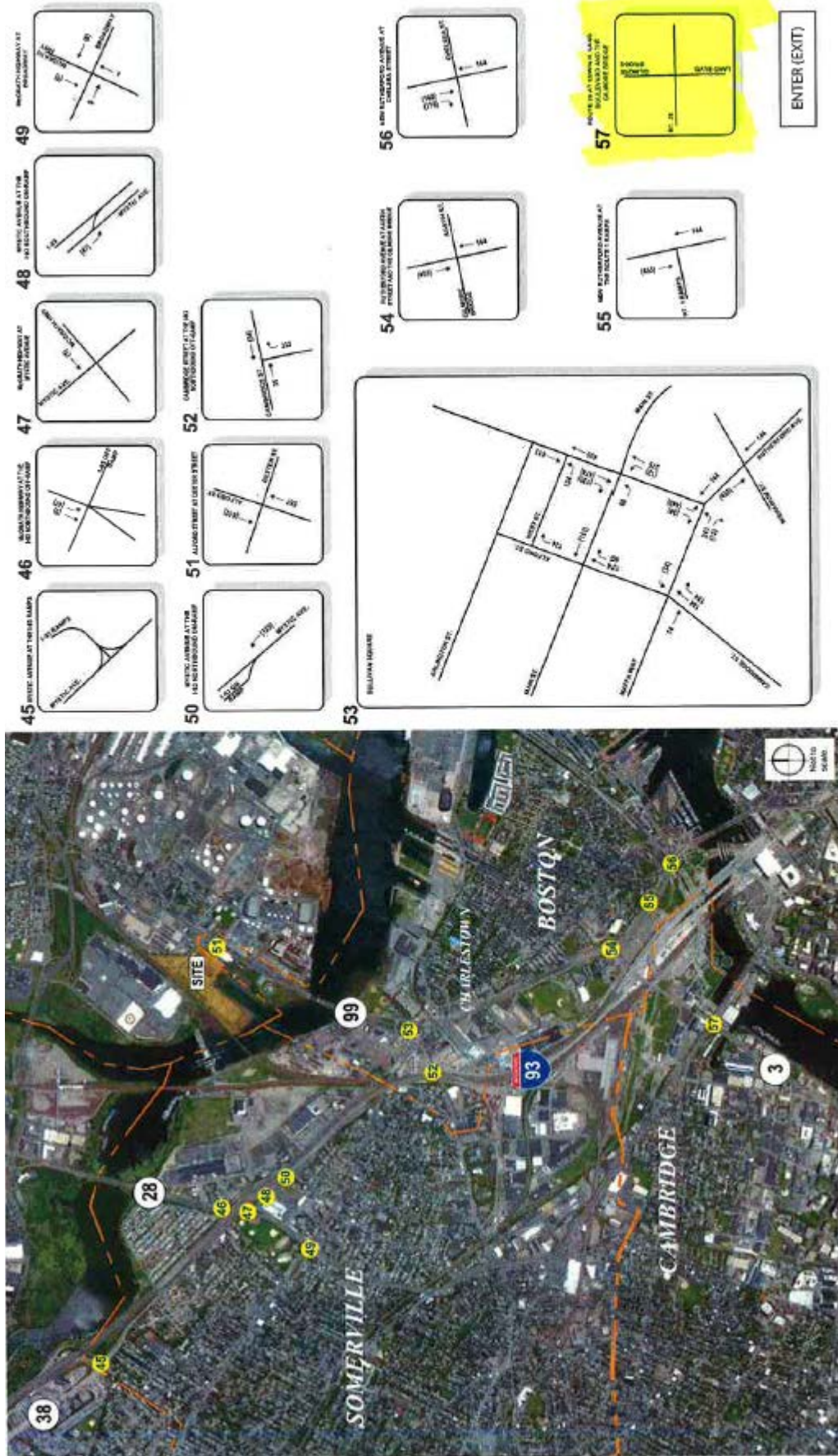


Figure 4-59 Saturday Afternoon Peak Hour Project-generated Trips, Somerville, Boston, and Cambridge Source: Howard/Stein-Hudson Associates, Inc., 2013

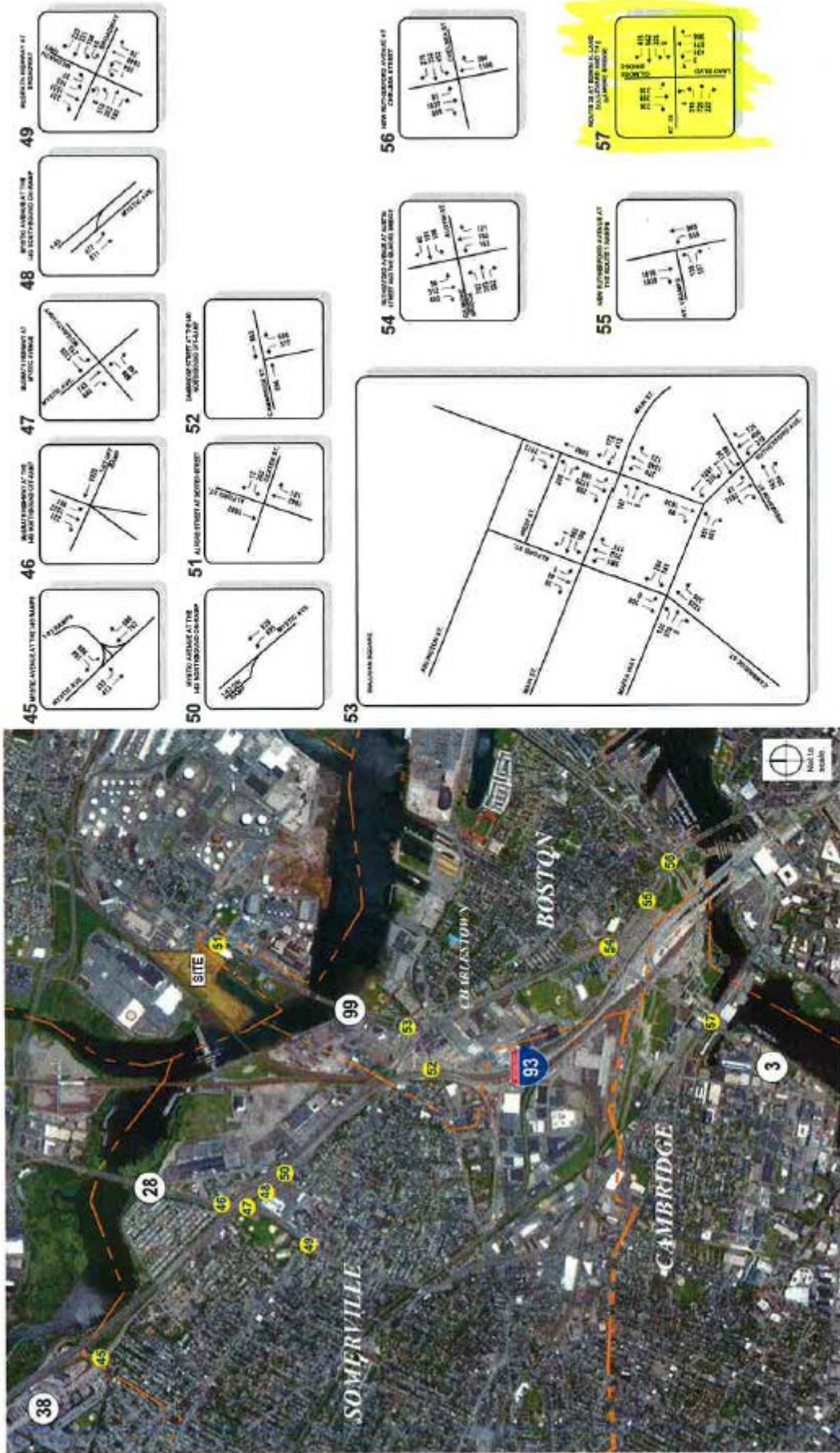


Figure 4-63
Build (2023) Friday p.m. Peak Hour Traffic Volumes, Somerville, Boston, and Cambridge
Source: Howard/Stein-Hudson Associates, Inc., 2013

2-28 Total Investment Outside the Property

The Wynn Resort in Everett will be a transformative catalyst for the City of Everett and the Commonwealth of Massachusetts. This one project will substantially transform the Lower Broadway section of Everett from a vacant, contaminated industrial site to a new, vibrant, and economically viable and publicly accessible waterfront development. The project will create thousands of jobs, stimulate billions of dollars in trade, and transform abandoned and contaminated land into an environmentally and economically sustainable operation that likely will stimulate incremental investment into the area.

The initial plan is to provide service with stops in Downtown and South Boston, with expansion as demand increases. Additionally, the project will incorporate new outdoor amenities including an extension of the Mystic River Walk and parklands, and pedestrian and bicycle connections between the Department of Conservation and Recreation (DCR) Mystic River Reservation and Lower Broadway.

Appropriate and adequate utilities are available for the Wynn Resort in Everett in the immediate area, all with connections in the Broadway corridor. Wynn Resorts will work to connect to, and in some cases upgrade, these utilities. Key components of the utility program include the following:

- Proposed Sanitary Sewer System Connection. In compliance with DEP Sewer Policy BRP 09-01, the Wynn Resort in Everett will provide mitigation to offset new sewer flows. Based on discussions with Everett and the MWRA, the company has identified two alternative mitigation plans. Wynn Resorts plans to continue to explore these mitigation approaches with Everett, the MWRA and DEP to determine the feasibility and efficacy of each alternative approach.
- Proposed Stormwater Improvements for Off-Site Roadway Work. It is anticipated that the storm drainage system in Route 99 will be upgraded with green infrastructure elements if opportunities are available to incorporate them. Green infrastructure uses vegetation and soils to manage stormwater runoff. Infiltration trenches, tree box filters and porous pavements are some of the green infrastructure that can be incorporated in the urban environment. At Santilli Circle, the stormwater improvements are expected to include deep sump catch basins, stormwater separators and bioretention areas.
- Proposed Water Supply Connection. The City of Everett will provide potable water to the Project. Everett's Engineering Division reviews and approves all plans to construct, extend or connect to the municipal water system. Water service can be provided from the existing 24-inch water main in Route 99, which should have adequate capacity to support the project. A new water service connection to the existing 24-inch water main will be required for the Wynn Resort in Everett's domestic and fire protection services.
- Proposed Electrical Connection. There is adequate electrical supply in the surrounding area of the project to supply the site. Connection to the grid will be on Broadway. The company is currently performing an analysis to determine any upgrades necessary in nearby substations and the transmission system.

4-8 Parking

4-9 Transportation Infrastructure

The Wynn Resort in Everett will provide convenient drop-off locations and services to all vehicular traffic. Key features of the on-property parking drop-off plans include:

- Guest, valet, taxi and bus drop-off will occur in the main Porte Cochere where all patrons/guests will enjoy the views of the river as well as the Winter Garden Lobby arrival experience.
- Self-parking and valet parking will occur on premise with tunnel access from the Porte Cochere to the underground valet parking.
- Employee drop-off for both cars and shuttles will occur at the back of the building adjacent to the employee entrance.
- Bus parking and employee parking will be off-site within a few miles of the premise. The bus drivers' lounge will include vending machines and restrooms.
- Refueling will be available from commercial gas stations around the area (there are 5 gas stations within a one-mile radius).
- Disabled-vehicle assistance will also be available commercially.

In addition, pursuant to the terms of its Surrounding Community Agreement with the City of Malden, Malden has agreed to be a “transportation hub” for the Wynn Resort in Everett. More specifically, Wynn proposes to offer shuttle service from key public transportation facilities to the Wynn Resort in Everett.

4-23 Egress from Gaming Establishment Site

Wynn will work as a partner with the City of Everett; the neighboring cities of Boston, Somerville, Medford, Malden, Revere and Chelsea; the Massachusetts Department of Transportation; the Department of Conservation and Recreation; and most importantly – with local residents to develop and deliver comprehensive transportation solutions for the areas surrounding the Wynn Resort in Everett. Wynn is prepared to manage and fund the design and construction of a multi-modal regional Transportation Improvements Program – private money solving longstanding public challenges to maximize access to the property and minimize potential traffic congestion.

All modes of transportation - vehicles, rail, buses, pedestrian, and cycling - as well as new water shuttle system will be used to access the site. Proposed ridership and configurations are described in extensive detail in the Draft Environmental Impact Report.

4-24 Adequacy of Existing Transportation Infrastructure

The condition, capacity, proposed utilization, and proposed improvements of the existing transportation infrastructure network are described in extensive detail in Chapter 4 of the Draft Environmental Impact Report. Wynn has engaged traffic consultants and is working as a partner with the City of Everett; the neighboring cities of Boston, Somerville, Medford, Malden, Revere and Chelsea; the Massachusetts Department of Transportation; the Department of Conservation and Recreation; and most importantly – with local residents to develop and deliver comprehensive transportation solutions for the areas surrounding the Wynn Resort in Everett. Wynn is prepared to manage and fund the design and construction of a multi-modal regional Transportation Improvements Program – private money solving longstanding public challenges to maximize access to the property and minimize potential traffic congestion. Overall, the Wynn Resort in Everett’s impact on the transportation infrastructure is expected to be adequately mitigated through the planned transportation infrastructure improvements.

Market Area Travel Time	Percent
Within 30 minutes (includes visitors arriving via Logan Airport)	62%
30 minutes – 1 hour	17%
1 – 1.5 hours	13%
1.5 – 2 hours	3%
2 – 3 hours	3%
3 - 4 hours	1%
>200 miles	1%
Total	100%

Travel Corridor	Patron Percent	Employee Percent	Composite Percent
I-93 North	15%	12%	15%
Route 16 West	5%	3%	5%
Route 38 West	1%	1%	1%
Broadway West	1%	1%	1%
Washington Street West	4%	3%	4%
I-93 South	38%	29%	37%
Rutherford Avenue	15%	9%	14%
Beacham Street East	2%	4%	2%
Route 16 East	3%	6%	3%
Route 1 North	9%	7%	9%
Route 99 North	2%	5%	2%
Main St (Everett Malden)	2%	3%	2%
Route 28 North	1%	1%	1%
Other Local	2%	16%	4%
Total	100%	100%	100%

4-25 Traffic Mitigation

Overall, the Wynn Resort in Everett’s impact on the transportation infrastructure is expected to be adequately mitigated through the planned transportation infrastructure improvements that will be completed in conjunction with the Wynn Resort in Everett. On December 16, 2013, Wynn submitted a Draft Environmental Impact Report ("DEIR") in accordance with the MEPA process. Chapter 4 of the DEIR provides detailed information regarding the planned transportation improvements that Wynn will undertake in connection with the Wynn Resort in Everett

The Wynn Resort in Everett will implement these measures in coordination with MassRIDES, which provides administrative and organizational assistance Regarding employee commuting services and informational packets of commuting alternatives to be made available to employees and resort guests. The Wynn Resort in Everett will encourage employees to participate in MassRIDES’ NuRide program, which rewards employees that choose to walk, bicycle, carpool, vanpool, or use public transportation.

- A Transportation Coordinator will be assigned for the Wynn Resort in Everett.

- MBTA bus stops will be provided along Lower Broadway at the primary driveway.
- Fixed-route shuttle bus service will be provided to and from the site and the MBTA Orange Line stations at Wellington Station and at Sullivan Square. This service may be expanded to include service to Logan International Airport, North Station, South Station and other major transportation hubs, and will be coordinated with Everett and the MBTA.
- Water shuttle service to the site would be provided through a private service. A dock to accommodate water transportation facilities will be provided as a part of the Wynn Resort in Everett.
- A touch-and-go dock will be provided as a part of the Wynn Resort in Everett for transient boat access to the site.
- Provide on-site sale of Charlie Cards for employees and for guests of the resort.
- Make available to employees and resort guests information regarding public transportation services, maps, schedules and fare information.
- Promote the use of public transportation to resort guests in website based materials including links to the appropriate homepages of the MBTA, MassRIDES, and Massport.
- Participate in the MBTA Corporate Pass Program to the extent practical and as allowable pursuant to commercial tenant lease requirements.
- Provide electric vehicle charging stations within the proposed parking garage.
- Coordinate with Zipcar to provide car sharing services at the site.
- Provide preferential parking for car/vanpools and alternatively fueled vehicles.
- Offer a “Guaranteed-Ride-Home” in case of emergency to employees that commute to the Wynn Resort in Everett by means other than private automobile; and
- Provide a periodic newsletter or bulletin concerning commuting options.

5-1 Infrastructure Costs

The Wynn Resort in Everett will be a transformative catalyst for Massachusetts, the City of Everett and its surrounding communities. The project will substantially transform the Lower Broadway section of Everett from a vacant, contaminated industrial site to a new, vibrant, publicly accessible waterfront development. The project will create thousands of jobs, stimulate billions of dollars in trade, and transform neglected land into an environmentally and economically sustainable operation that will stimulate additional investment into the Greater Boston area.

5-33 Traffic Control Measures

All modes of transportation - vehicles, rail, buses, pedestrian, and cycling - as well as new water shuttle system will be used to access the site. Proposed ridership and configurations are described in extensive detail in the Draft Environmental Impact Report.

Exhibit 5 – Travel Mode Shares

<u>Travel Mode</u>	<u>Patrons</u>	<u>Employees</u>
Automobiles		
Park on site	69%	0%
Taxi	8%	0%
Park remotely (connect to employee shuttle)	0%	44% ¹⁾
Total	77%	44%
Public transportation		
Orange line (connect to transit shuttle)	10%	20%
Local bus	0%	10%
Water transportation	3%	3%
Total	13%	33%
Employee Shuttle Bus ¹⁾	0%	20% ¹⁾
Tour Bus	10%	0%
Walk/Bicycle	0%	3%
Total	100%	100%

Exhibit 12 – Vehicle Trip Distribution by Travel Corridor

Travel Corridor	Patron Percent	Employee Percent	Composite Percent
I-93 North	15%	12%	15%
Route 16 West	5%	3%	5%
Route 38 West	1%	1%	1%
Broadway West	1%	1%	1%
Washington Street West	4%	3%	4%
I-93 South	38%	29%	37%
Rutherford Avenue	15%	9%	14%
Beacham Street East	2%	4%	2%
Route 16 East	3%	6%	3%
Route 1 North	9%	7%	9%
Route 99 North	2%	5%	2%
Main St (Everett Malden)	2%	3%	2%
Route 28 North	1%	1%	1%
Other Local	2%	16%	4%
Total	100%	100%	100%

5-34 Traffic for Special Events

The traffic infrastructure design and mitigation plans, as well as the demand management approaches, are designed to handle the maximum traffic expected at the Wynn Resort in Everett, including special events.

In the event of an unforeseen spike in traffic and/or parking demand for the Wynn Resort in Everett caused by a special event, the two potential areas of overflow would be vehicle drop-offs (taxis, limos, buses, etc.), and parking demand beyond capacity. The entrance and driveway configuration and Lower Broadway reconstruction will be robust enough to handle significant additional drop-off traffic. Any resulting unusual delay in wait times at the entrance could be managed by police traffic details. As discussed in other sections, any parking overflow would be handled by valet parking of overflow cars to nearby valet parking lots.

G. OTHER

No relevant documents

3. DEVELOPMENT

Legal Framework

In determining whether a community is a surrounding community, the commission . . . will evaluate whether: . . . The community will be significantly and adversely affected by the development of the gaming establishment prior to its opening taking into account such factors as noise and environmental impacts generated during its construction; increased construction vehicle trips on roadways within the community and intersecting the community; and projected increased traffic during the period of construction. 205 CMR 125.01(2)(b)(3)

Executive Summary

Community Petition

Cambridge does not argue that there will be an impact during the development of Wynn's proposed facility.

Applicant Response

Wynn also finds that there will be no noise, dust, erosion, vibration, or traffic impacts during the development on Cambridge.

DEIR Comment Letter

More detailed information regarding construction period impacts, in particular traffic impacts, will be required in the FEIR. . . . The FEIR should specifically address how construction would impact ongoing traffic operations during the construction period.

Consultant Analysis – Green

Transportation Infrastructure– Minor degradation of infrastructure is anticipated due to the added trips onto Route 16 and Memorial Drive. Both Memorial Drive and Route 16 (between Mass Ave and Cambridge/Somerville city limits) have existing truck exclusions, and therefore heavy vehicles will be required to use other routes. Thus, impacts on the City of Cambridge's infrastructure are expected to be minimal.

Consultant Analysis - Dewberry

Transportation Infrastructure-We agree that Cambridge streets will not offer a convenient route for heavy vehicles that are involved in the Project construction; hence the impact of construction vehicles on Cambridge streets would be minimal to none.

A. COMMUNITY PETITION

No relevant documents

B. APPLICANT RESPONSE

From 1/29/2014 Community Presentation:

Sound Map for Wynn Everett Construction

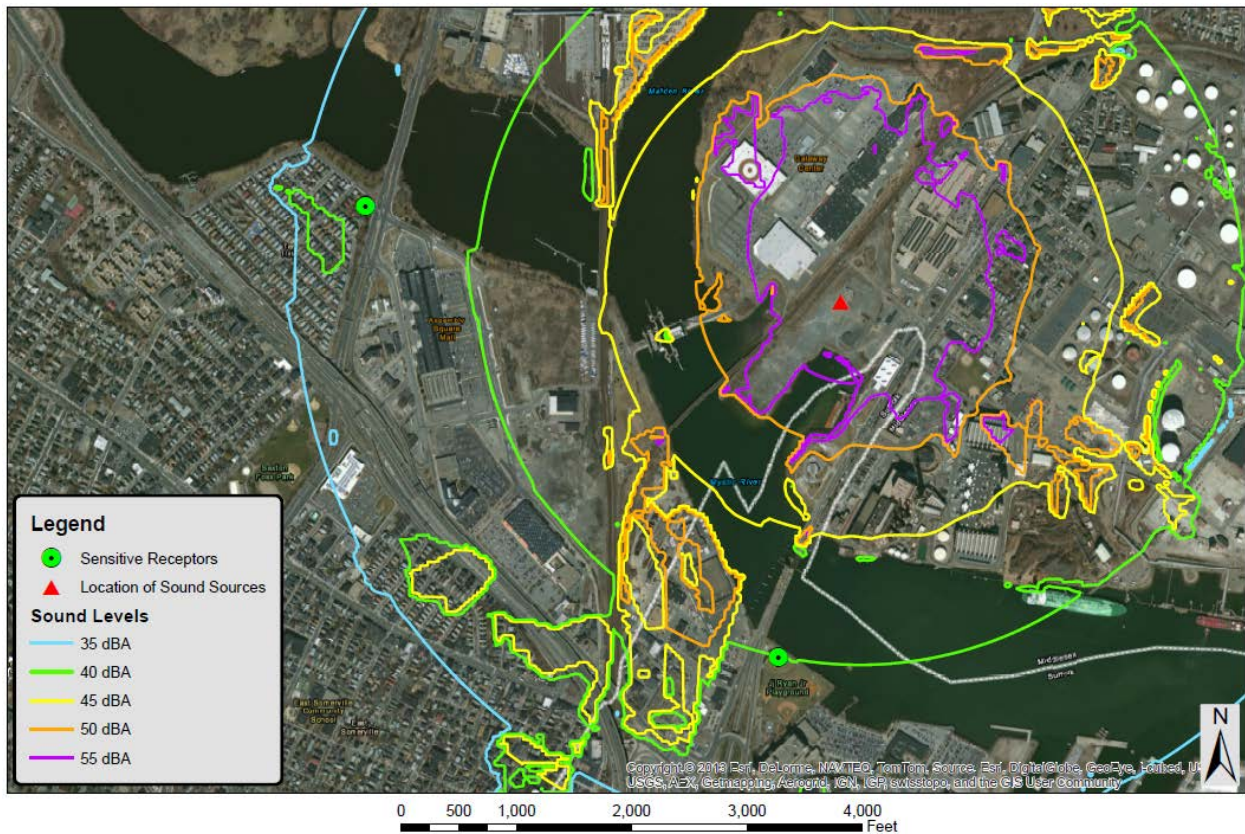


Figure 1
Maximum Sound Levels (Leq, dBA) from
Wynn Everett Construction

1/29/2014 Transcript

Pg. 82 of transcript, Mr. Gordon

20 So, when we think about construction
21 impacts that's one of the things we like
about

22 this site is we can -- you don't have the same
23 thing as close in residential neighbors as you
24 might have on some sites. So, we spent a lot
p. 83, Chris Gordon

1 of time thinking about that. And that's one of
2 the great features we think of this site both
3 for operations and for construction.

Page 87 of Transcript

Mr. Gordon:

5 You can't quite read these decibels
6 on the slide, I apologize. But by the time you
7 get across the river and you're out into
8 Somerville, you get down into areas as the
9 traffic folks labeled it, this is national
10 numbers, this isn't our language. Quiet,
11 suburban residential areas at night. That's
12 about as quiet as you can get.

p. 86, Mr. Gordon

8 Construction, everybody has their
9 own sort of folklore about construction. But
10 we want it to be much more quantitative. So,
11 we looked at five standard metrics that are
12 used around the world of whether or not we
13 would impact. They're construction noise,
14 dust, erosion, vibration and traffic. Those
are

15 tangible impacts that we can measure.

16 And we're going to be very hard on
17 our construction folks to make sure we don't
18 have these impacts. When we get to each
city,

19 we want to talk to you about what we think
you

20 might see in those areas.

21 This is an example. This a noise

22 contour map that we had developed. This is
our

23 site. We asked them to take the middle of
the

24 site and to take the worst construction noise
p. 87, Mr. Gordon

1 we would develop, which is primarily putting
in

2 the sheathing and the piles at the beginning of
3 the project. And then measure the decibel
4 levels to all of the areas around us.

5 You can't quite read these decibels

6 on the slide, I apologize. But by the time you
7 get across the river and you're out into

8 Somerville, you get down into areas as the
9 traffic folks labeled it, this is national

10 numbers, this isn't our language. Quiet,
11 suburban residential areas at night. That's

12 about as quiet as you can get.

13 So, that means you really will not

14 be able to hear much of anything when you
get

15 over towards Somerville and certainly not
16 beyond that. So, we think the numbers are

17 quite low on construction noise. I'm going to
18 turn it over to Suzanne who's going to talk

19 about we talked about economic impacts.

p. 93, Mr. Gordon

23 closely at the construction impacts. And

24 again, we don't mean to be wise with this

p. 94, Mr. Gordon

1 slide, but we didn't find any. It's too far

2 away for the things you measure for

3 construction. You saw the noise contour map,

4 noise, dust, erosion, vibration, all that. We

5 just don't see any of it for our construction

6 operation at all.

C. RPA ANALYSIS

No relevant documents

D. DEIR ANALYSIS

DEIR CERTIFICATE

The construction period is identified as 36 months. It will 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 DEIR states that a Construction Manager for the Project will provide a detailed Construction Management Plan prior to commencing construction on the site. The DEIR included measures that are typically employed to address construction impacts.

...

The FEIR should discuss why signal warrant analyses conducted in accordance with the Manual of Uniform Traffic Control Devices (MUTCD) were not included in the DEIR. While many intersections clearly meet the warrant analysis based upon projected traffic volumes, it is unclear if other currently unsignalized intersections in the Study Area will require signalization subsequent to project completion. The FEIR should either include signal warrant analyses for these intersections, or identify those intersections that appear likely to require the preparation of a signal warrant analysis and include a commitment by the Proponent to perform the analyses and a timeline for completion. Signal warrant analyses for intersections under state jurisdiction will assist in the preparation of draft Section 61 Findings and future permit applications.

E. CONSULTANT ANALYSIS

GREEN ANALYSIS

DEWBERRY ANALYSIS

F. APPLICATION

2-8 Budget

. This amount, which includes all hard construction, land and infrastructure, FF&E (furniture, fixtures, and equipment), pre-opening, license, initial host-community, financing, and working-capital costs, equates to an all-in project cost of approximately \$600 per developable square foot.

2-10 Timeline for Construction

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.

Wynn estimates that the pre-construction phase (including regulatory, design, trade long lead material procurement and permits) will be completed by June 2015. The interior fitout will be completed in the second quarter of 2017 and the opening to the public will occur soon thereafter.

In addition to the on-site construction, Wynn will be responsible, whether in full or in-part, for off-site mitigation work, including utility work and transportation improvements. Many of the off-site transportation improvements will require coordination with local, state and federal agencies.

2-11 Pro-Forma Cash Flow

Wynn Resorts plans to fund the construction of the Wynn Resort in Everett with a combination of cash equity contributions from Wynn Resorts and debt project financing. The initial cash equity contributions from Wynn Resorts will ensure that construction activities commence soon after the award of a gaming license and provide a significant funding cushion during the initial phases of construction should there be any disruption in the capital markets. It is important to note that with \$2.7 billion of cash and investments on its balance sheet as of September 30, 2013, including \$1.0 billion of cash at the Wynn Resorts parent-company level, and an estimated \$1.4 billion of annual discretionary free cash flow generation (after the payment of interest and maintenance capital expenditures), Wynn Resorts has the financial capacity to fund the entire Wynn Resort in Everett project with a combination of existing cash on its balance sheet today and annual operating free cash flow exclusive of any debt financing.

2-28 Total Investment Outside the Property

The Wynn Resort in Everett will be a transformative catalyst for the City of Everett and the Commonwealth of Massachusetts. This one project will substantially transform the Lower Broadway section of Everett from a vacant, contaminated industrial site to a new, vibrant, and economically viable and publicly accessible waterfront development. The project will create thousands of jobs, stimulate billions of dollars in trade, and transform abandoned and contaminated land into an environmentally and economically sustainable operation that likely will stimulate incremental investment into the area.

In order to mitigate any potential traffic issues, facilitate visitation to the site, redevelop the project's Mystic-River waterfront, and maximize the revenue opportunity for the company and the Commonwealth, Wynn Resorts plans to invest up to approximately \$50 million in infrastructure outside the property boundaries. These amounts include \$30-40 million in traffic infrastructure costs (highway, road, and traffic-circle improvements) and \$10-15 million in intermodal transportation and utility services and improvements. In addition, the Wynn Resort in Everett will also redevelop and provide open access to the Everett waterfront on the Mystic

River.

2-30 Construction Plan

Wynn estimates that the pre-construction phase (including regulatory, design, trade long lead material procurement and permits) will be completed by June 2015. Site remediation would begin upon receipt of a gaming license and is estimated to be complete by the end of the first quarter of 2015. The interior fitout will be completed in the second quarter of 2017 and the opening to the public will occur soon thereafter. In addition to the on-site construction, Wynn will be responsible, whether in full or in-part, for off-site mitigation work, including utility work and transportation improvements. Many of the off-site transportation improvements will require coordination with local, state and federal agencies. Wynn will begin this process upon receipt of the license and complete off-site infrastructure by end of the first quarter of 2017 prior to the opening to the public.

4-54 Sustainable Building Construction

The Wynn Resort in Everett will incorporate numerous sustainable building construction measures. Use of recycled, sustainable and locally sourced materials will be encouraged and rewarded during the contracting and bidding processes. Construction waste material from demolition and new construction will be recycled when possible, with contractors required to reuse or recycle 75% of the construction waste stream. The disposal contracts will include specific requirements that will ensure that construction procedures allow for the sufficient space for the necessary segregation, reprocessing, reuse and recycling of materials.

G. OTHER

No relevant documents

4. OPERATION

Legal Framework

In determining whether a community is a surrounding community, the commission . . . will evaluate whether: . . . The community will be significantly and adversely affected by the operation of the gaming establishment after its opening taking into account such factors as potential public safety impacts on the community; increased demand on community and regional water and sewer systems; impacts on the community from storm water run-off, associated pollutants, and changes in drainage patterns; stresses on the community's housing stock including any projected negative impacts on the appraised value of housing stock due to a gaming establishment; any negative impact on local, retail, entertainment, and service establishments in the community; increased social service needs including, but not limited to, those related to problem gambling; and demonstrated impact on public education in the community. 205 CMR 125.01(2)(b)(4)

Executive Summary

Community Petition

Cambridge is concerned that, because of Cambridge's proximity to Everett, additional impacts on social services and public safety in the community are expected. Cambridge is also concerned about the impact on Cambridge's smaller and mid-sized entertainment venues by the additional competition from subsidized casino entertainment.

Applicant Response

Wynn projects an increase of 0.9 billion to 1+ billion of revenue for regional businesses each year due to the proximity of the Wynn establishment. Of the \$804 million in gaming revenues forecast, Wynn projects that approximately 66% of the revenue is expected from in-state players, with nearly 34% comes from out-of-state residents.

“Summary: Wynn Everett is expected to benefit regional businesses in the tri-county area consisting of Middlesex, Suffolk, and Norfolk Counties. Wynn’s expenditures in the local economy are expected to spur further expenditures, and, ultimately, receipt of additional gross revenues at regional businesses. In Year 1 of the Base Case Scenario, Wynn Everett and the regional businesses are expected to generate \$938.48 million in additional gross revenues due to Wynn Everett’s effect on the local economy.

From Wynn's 1/29/2014 Community Presentation
Slide: "Cambridge Community Impacts"

Estimated Impacts from Wynn Everett on Cambridge

Earnings impact: \$11,676,870 (Population and distance estimate)

Source: U.S. Census, U.S. Department of Commerce; TMG Consulting analysis

Transcript

Page 88 – Suzanne Leckert - TMG

21 In our study, which you should have
22 all received a copy of some time ago, we
23 projected 5144 new jobs or rather FTEs
24 throughout the state, 3287 direct 1858
indirect

Page 89

1 and induced FTEs throughout the
Commonwealth.

2 In addition, \$270 million in new
3 earnings. \$136 million are attributed to
4 direct onsite earnings at the Wynn Everett
5 facility, and another \$134 million indirect and

6 induced earnings throughout the
Commonwealth.

15 ...So, what we did was following
16 the commitments made by Wynn Resorts, we
17 assumed that 75 percent of all of the induced
18 and indirect impacts would be felt within
about

19 a 30-minute drive of the Wynn Everett
facility.

20 That's about 1400 of the indirect and induced
21 jobs. And a little bit over \$203 million of
22 the earnings being shared by those living
23 within a 30-minute drive of the Wynn Everett
24 facility.

DEIR Comment Letter

The DEIR includes a commitment to offset new sewer flows with removal of extraneous clean water (infiltration/inflow (Ill)) on a 4: 1 basis of 4 gallons removed for every gallon generated. Based on discussions with Everett and the MWRA, the DEIR presented two alternative mitigation plans. One alternative consists of developing a standard targeted program of Ill removal within the affected sewer system either through funding for projects or for studies to examine removal opportunities. The DEIR 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.

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. The FEIR should include a more detailed comparison of the two alternatives to support the analysis of the benefits of each.

...

The City of Everett has confirmed that adequate capacity is available to meet the project's water demand.

Consultant Analysis

HLT ADVISORY

With respect to potential negative impacts from the Casino on local retail, entertainment and service establishments in the community, the Cambridge Petition asserts there will be negative “impacts on Cambridge's smaller and mid-sized entertainment venues by the additional competition from subsidized casino entertainment.” The Cambridge Petition neither identifies specific venues nor quantifies the extent of the negative impacts expected.

Cambridge’s concerns that a Casino in Everett could cannibalize revenues at smaller and mid-sized entertainment venues appear based on several factors. Each of these is addressed below:

Failure to recognize existing spending by Massachusetts residents at out- of-state casinos—The Center for Policy Analysis Report estimated that Massachusetts residents spend \$710 million annually at six casinos located in Connecticut (i.e., Foxwoods and Mohegan Sun), Rhode Island (i.e., Twin River, Newport Grand) and Maine (i.e., Hollywood Bangor, Oxford Casino). The TMG Consulting report prepared for Wynn estimates that more than \$500 million of the \$804 million projected gaming revenue at the Wynn Casino is already being spent by Massachusetts residents at out of state casinos as well as the entertainment offerings at these casinos.

Current levels of spending at Cambridge entertainment venues (and other local retail, entertainment and service establishments) occur despite the historical outflow of gaming spending. Repatriation of this spending to an Everett casino (together with the associated spending on travel to out-of-state destinations) should be seen as beneficial to Cambridge and other regional hospitality and entertainment providers.

No empirical evidence supports a 100% trade-off between dollars spent at a casino and dollars spent on retail, entertainment and services.

In fact, while some market overlap undoubtedly exists, for the most part it would be reasonable to assume that the Casino market and Cambridge’s traditional customer base are largely dissimilar.

Failure to consider potential positive impacts—The Cambridge petition makes no reference to the potential positive impacts from a casino located in Everett. Positive impacts to the region arising from Wynn’s casino development and operations are likely and would include:

- Direct employment
- New visitors to the area
- Purchases of goods and services

Conclusion: The Petition submitted by Cambridge with respect to negative impacts on “smaller and mid-sized entertainment venues” in the City provides no detail or substantiation of how such negative impacts would be generated. Based on our review of the Cambridge Petition, Wynn’s application, and the absence of any ILEV petitions from Cambridge venues, we do not believe any meaningful negative impacts from operation of the proposed Wynn Casino are likely.

CITY POINT PARTNERS

“[N]either the Wynn Casino nor the Mohegan Sun Casino will impact the water and sewer services in proximate communities including (for Wynn Casino) ... Cambridge.”

LDS

Based on these materials and our independent evaluation, we find that the communities surrounding Everett will not be significantly and adversely affected by the operation of a Category 1 gaming establishment after its opening due to housing or school impacts resulting from the facility. Furthermore, given the high unemployment and housing vacancy rates in the area, it is more likely than not that the Category 1 casino will be beneficial to the housing markets in these communities and therefore add to the real estate tax base as well as increase overall consumer spending in the area.

Unemployment

The application states that there will be 3,287 jobs created by the new Category 1 Casino with an average salary of \$41,500 and \$51,750 including benefits. In addition, they have estimated that 20% of the positions will be supervisory or above. They have made arrangements with the Town of Malden to be their “transportation HUB” therefore shuttle services will be provided to public transportation at the orange line. Please see Exhibit 1 which is a portion of the MBTA Rapid Transit Route Map. The route map shows connections from the Orange line to other service north, south and west. They have also estimated that 95% of jobs will be filled by local workers. Please see Exhibit 2, a map outlining a fifteen mile radius around Everett City Hall. Exhibit 3 shows the communities of Boston, Chelsea, Everett, Malden, Medford, Revere, and Somerville which are physically adjacent to Everett (the “Communities”) which we used for purposes of examining certain demographics.

Table 1 shows that as of December 2013 the communities have a total of 27,967 unemployed persons or job seekers. In addition, Table 2 includes the petitioners Cambridge and Saugus that have a total of 3,399 unemployed or job seekers as of December 2013.

Therefore, as of December 2013, there are more than ten times as many job seekers in Cambridge, Saugus and the adjacent communities as there are positions estimated to be created by the Everett casino. We further note that these communities represent only a portion of the communities in a 15 mile radius and are accessible by public transportation.

Based on these communities, there are 30,205 vacant housing units in these communities that could be absorbed in the event workers do move to the area to work at the Subject Property.

Furthermore, if you examine the housing vacancy in Cambridge and Saugus, there are an additional 3,681 vacant units as shown on the table below:

Therefore, as of the 2008-2012 ACS, there are ten times as many vacant housing units in the communities we examined as there are new job positions estimated to be created by the Everett casino

Table 5 below shows that the number of school age or potential school age children, decreased significantly in the two petition communities from 2000 to 2010 in Cambridge and Saugus.

Therefore, based on contracting school age populations in the petition communities, it is reasonable to conclude that the Category 1 casino in Everett will not adversely impact schools in the petition communities.

Mark Vander Linden Analysis

Excerpts from analysis by Mark Vander Linden, MGC Director of Research and Problem Gambling, 3/14/14

In the petition, Cambridge generally claims “additional impacts on social service and public safety” could accompany a casino in close proximity to their residents.

To facilitate an evaluation of the general issues cited by surrounding communities, Wynn MA, LLC employed the services of RKG Associates, Inc. In relation to Cambridge’s concerns, RKG Associates, Inc. states; “The resort casino will utilize its state of the art construction, in house security systems along with a large security team to offset some portion of the additional municipal services. The ability for the City of Everett to fund the costs with guaranteed payments from the Developer is rare and a significant benefit to this project and the neighboring communities”.

Wynn MA’s RFA-2 application mentions numerous measures intended to mitigate problem gambling and related social problems but doesn’t state specifically how this may reduce problems in surrounding communities.

It seems logical to conclude that the increase in persons with gambling disorders would create a burden on the nearby social service agencies. However, as pointed out by Dr. Williams, co-principal investigator on MGC’s SEIGMA project, the bulk of the impacts tend to be social/nonmonetary in nature because only the minority of problem gamblers seek or receive treatment, and only a minority typically have police/child welfare/employment involvement. That being said, it is difficult to accurately predict the actual impact as ultimately it will vary between jurisdictions depending on the type of gambling introduced and the magnitude of the change.

There does appear to be a positive correlation between casino proximity and increase in drunk driving incidents.

Many studies have found a relationship between proximity to gambling venues and the prevalence of problem gambling.

Dr. Robert Williams conducted an exhaustive review of studies in the US and international jurisdictions regarding the relationship between casinos and increase in crime. He found the evidence is somewhat mixed concerning the impact that legal gambling introduction has on crime rates. The most common finding is that crime rates do indeed increase with increased gambling availability. The main caveat to studies with this finding is that some of them are not referring to aggregate crime rates. Rather, some are focusing on the impacts for specific types of crime, such as increased fatal alcohol-related traffic accidents following the introduction of casinos.

Only a couple of studies reported a general increase in all categories of crime.

Several studies failed to find increased crime rates, or only found increases in some communities but not others. Dr. Williams concluded that although there are good theoretical reasons to expect a positive relationship between gambling introduction and crime, it may not always manifest itself. ...Because the magnitude of the increase in crime is not large in most studies, the presence of any of these other moderating factors has potential to negate the increased crime effect.

Social and Economic Impact of Gaming in Massachusetts

The question, to what extent will the introduction of a gaming facility create negative impacts on any specific community is complex and difficult to answer. However, the Commission is currently working closely with SEIGMA/UMASS Amherst to conduct a controlled before-after comparison of changes in rates of problem gambling and numerous social and economic indices coincident with the introduction of a gaming facility. The ongoing findings of this study will provide the most accurate determination of what the true social and economic impact is on host and surrounding communities. A more precise understanding of the impacts will inform the best use of the Public Health Trust Fund which was created to assist social service and public health programs to mitigate the potential addictive nature of gambling and the Community Mitigation Fund which was created to assist the host and surrounding communities in offsetting costs related to the construction and operation of a gaming establishment.

A. COMMUNITY PETITION

p. 69

22 MR. HAAS: Good morning. My name is
23 Robert Hass. I am the Police Commissioner for
24 the city of Cambridge. And I'm really going to
p. 70

1 talk about a really narrow portion of our
2 concerns with respect to crime and crime
3 impact.
4 We know that crime is a regional
5 problem. And what's particularly interesting
6 about Everett, Cambridge and Somerville is that
7 we've seen a great deal of interplay between
8 the three jurisdictions. And I'm going to talk
9 about three examples of where we've seen this
10 play out.

11 We've seen it in our drug markets
12 between the three cities in terms of the
13 interplay between those three cities and how
14 it's exchanged between them.
15 We also see it with our gang
16 activity in terms of Metro gang task force.
17 For many years, Cambridge, Everett and
18 Somerville have all been partners in that Metro
19 gang force. And we're seeing those players
20 cross over constantly between our
21 jurisdictions.

22 Lastly and most importantly I think
23 the initiative we've had underway now for the
24 last two years. We've actually partnered with
p. 71

1 Everett and Somerville in looking at high-risk
2 impact players. We are seeing correlation and
3 transfer of those people between our three
4 jurisdiction over and over again. I think it's
5 short-sighted we believe that they're going to
6 be reallocated or staying in one area. But I
7 think the evidence we have in the past in terms
8 of interplay and how a crossover of
9 jurisdictional lines is just going to be
10 symptomatic of what we're going to see in the
11 future if there is in fact an influx of crime.
12 I will tell you in the last two
13 years, we've now seen a 23 percent decrease in
14 our violent crime. It's a dramatic decrease.
15 And I really attribute it to the partnership

16 that we've had with Somerville and Everett.
17 And both of those jurisdictions have seen equal
18 reductions in their crime.

19 Prior to that we were seeing maybe
20 two, three percent reductions. And this a
21 dramatic increase. And I think it's because of
22 the collaboration we've had between our
23 jurisdictions that we're actually seeing that
24 downfall. And I think if we don't maintain
p. 72

1 that kind of partnership, relationship, we're
2 going to be back in a reactionary posture,
3 waiting for crime to happen and trying to deal
4 with it.

5 I think the partnerships we've
6 established now have worked really well for us.
7 And I think it will continue to work very well
8 for us in terms of going forward. And I think
9 that's why anything that happens in Everett,
10 we're going to feel it in Cambridge and vice
11 versa.

12 We are getting away from this whole
13 displacement notion where we're just pushing
14 crime from one place to another. And we've
15 really been communicating in terms of being
16 able to identify patterns and trends very
17 early, reacting to them stopping them. So, I
18 think the collaboration and partnerships are
19 extremely important. I think it needs to be
20 maintained if in fact Everett is going to be
21 successful in its venture.

22 COMMISSIONER MCHUGH: And how,
23 Chief, does that impact on the mitigation that
24 you thing would be appropriate?

p. 73

1 MR. HAAS: So, I think what we're
2 concerned about as I think Lee indicated in his
3 testimony is not so much about the monies, but
4 the opportunities that every surrounding
5 community will have access to in terms of being
6 able to maintain and enhance that partnership
7 and collaboration with Everett.

8 CHAIRMAN CROSBY: Is there anything
9 that gets in the way of maintaining this
10 working relationship if you're not a designated

11 a surrounding community?
 12 MR. HAAS: No. I just think it
 13 enhances our position.
 ...
 p. 75
 4 MR. HAAS: I was Morristown. So,
 5 I've seen some of that. And again, I'm not
 6 saying it's going to be a direct correlation
 7 between the activity and the casino itself.

8 But what are the collateral effects that are
 9 taking place?
 10 One of the big concerns we're seeing
 11 now in our region is human trafficking. We're
 12 starting to see a lot more that taking place.
 13 I suspect you may see some more of that taking
 14 place as a result just the nature of the
 15 activities that will take place as a result of
 16 the casino itself.

B. APPLICANT RESPONSE

From the TMG Consulting Report, “Regional Business Benefits”

We include Wynn Everett’s direct expenditures in total output because Wynn Everett will be a regional business. The table below details TMG’s projections for increases in gross revenues at regional businesses by operating scenario.

Projected Gross Revenue Increases at Regional Businesses by Scenario, Five Year Projection

Scenario	Year 1	Year 2	Year 3	Year 4	Year 5
Base	\$938.48 M	\$960.06 M	\$982.14 M	\$1,004.73 M	\$1,027.84 M
Best	\$1,086.60 M	\$1,111.59 M	\$1,137.16 M	\$1,163.31 M	\$1,190.07 M
Worst	\$755.30 M	\$772.68 M	\$790.45 M	\$808.63 M	\$827.23 M

pg. 88 of Transcript
 Suzanne Leckert
 21 In our study, which you should have
 22 all received a copy of some time ago, we
 23 projected 5144 new jobs or rather FTEs
 24 throughout the state, 3287 direct 1858
 indirect
 p. 89, Ms. Leckert
 1 and induced FTEs throughout the
 Commonwealth.
 2 In addition, \$270 million in new
 3 earnings. \$136 million are attributed to
 4 direct onsite earnings at the Wynn Everett
 5 facility, and another \$134 million indirect and
 6 induced earnings throughout the
 Commonwealth.
 p. 89, Ms. Leckert

15 Commonwealth. So, what we did was
 following
 16 the commitments made by Wynn Resorts,
 we
 17 assumed that 75 percent of all of the induced
 18 and indirect impacts would be felt within
 about
 19 a 30-minute drive of the Wynn Everett
 facility.
 20 That's about 1400 of the indirect and
 induced
 21 jobs. And a little bit over \$203 million of
 22 the earnings being shared by those living
 23 within a 30-minute drive of the Wynn
 Everett
 24 facility.
 p. 94, Mr. Gordon

7 This is an economic impact as
8 Suzanne talked about earlier. This shows
9 about
10 \$11 million positive economic impact. So,
11 instead of it being a negative impact, we
12 view
13 as quite a positive, which of course wouldn't
14 be mitigated.

13 So, finally, our conclusion on
14 Cambridge with all due respect is that it
15 wouldn't be designated as a surrounding
16 community because we couldn't identify any
17 impact and certainly not anything significant
18 and adverse as the legislation requires.

C. RPA ANALYSIS

No relevant documents

D. DEIR ANALYSIS

DEIR COMMENT LETTER

The Project will generate approximately 228,428 GPD of wastewater and requires a Sewer Connection Permit. 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.

...

E. CONSULTANT ANALYSIS

HLT ADVISORY

As requested, we are submitting this letter report with respect to a request by the City of Cambridge (the “City” or “Cambridge”) to be declared a “Surrounding Community” as set out in MGL c. 23K 17(a) and 205 CMR 125.01(2). The Surrounding Community request is being made in response to an Application by Wynn MA, LLC (“Wynn”) for a casino (the “Casino”) in Everett, Massachusetts. This report outlines the steps we took to conduct the analysis together with our conclusions.

1. BACKGROUND

In accordance with MGL c. 23K 17(a) and 205 CMR 125.01(2), any Massachusetts community has the right to petition the Commission for declaration as a Surrounding Community if the community can: 1) demonstrate negative impacts from a gaming development and 2) has requested and been denied Surrounding Community status by an Applicant. In consideration of a community petition, the Commission must consider various factors and evaluate:

- The community’s proximity to the host community and the gaming establishment.
- The impact on transportation infrastructure in the community by the gaming establishment.
- The noise, traffic and environmental impacts on the community during construction of the gaming establishment.
- The negative impact the gaming establishment could have on local retail, entertainment and service establishments in the community.
- Any other relevant potential impacts to the community.

The City of Cambridge requested that Wynn declare the City a Surrounding Community with respect to the Category 1 Application proposed for Everett. The basis for the City’s request is that:

- Cambridge is located within five miles of the proposed Wynn Casino;
- patrons of the Wynn Casino will cause traffic and transportation issues;
- operations of the Wynn Casino will cause public safety and social services impacts;
and
- Cambridge’s smaller and mid-sized entertainment venues will be negatively impacted by additional competition from subsidized casino entertainment.

Wynn rejected the City’s request. As a result, the City petitioned the Commission to adjudicate its request for Surrounding Community status in an undated letter from City Manager, Richard Rossi (the “Cambridge Petition”). Wynn subsequently responded to the City’s petition in a letter dated January 23, 2014.

2. OBJECTIVE AND SCOPE

The Commission engaged HLT¹ to comment on the potential impacts that a Category 1 Casino, located in Everett, might have on the local retail, entertainment and service establishments in Cambridge.

To complete this assessment we:

- Reviewed the Petition and related correspondence between the City, Wynn and/or the Commission.
- Reviewed applicable sections of Wynn’s Category 1 Application including the appended reports:
 - Wynn Everett Gaming Market Assessment, November 2013 prepared by TMG Consulting
 - Impact of the Wynn Resort Casino on Neighboring Communities, August 29, 2013 prepared by RKG Associates Inc.
- Reviewed the following background documents:
 - Comprehensive Analysis: Projecting and Preparing for Potential Impact of Expanded Gaming on Commonwealth of Massachusetts, August 2008 (together with March 2010 update), by Spectrum Gaming Group, prepared for the Commonwealth of Massachusetts (the “Spectrum Report”).
 - Massachusetts Statewide Gaming Report, June 2010, prepared by the Innovation Group for the Massachusetts Senate, Commonwealth of Massachusetts.
 - New England Casino Gaming Update, 2013 prepared by the Center for Policy Analysis, University of Massachusetts Dartmouth (the “Center for Policy Analysis Report”).
- Accessed other information and benchmarks in our files relevant to this situation.

Upon completion of these steps we completed the following letter report.

¹ HLT Advisory is a Toronto-based consultancy focused on the gaming, tourism, accommodation and leisure industries. HLT has a significant public- and private-sector client base within these industries and has completed a broad range of market assessment, bid process, economic impact and strategic planning engagements across North America as well as in Asia, Europe and the Caribbean.

3. BASIS FOR THE CAMBRIDGE PETITION

4. THE WYNN PROPOSAL

Wynn is proposing a \$1.59 billion destination casino incorporating a 500-room hotel, eight restaurants with more than 1,000 seats, a 7,000 sq. ft. sports bar, nightclub, 1,000 seat multi-use space and a 500-seat outdoor amphitheatre. Wynn’s Application identifies several relevant characteristics with respect to entertainment and related non-gaming amenities, including:

- Integrating the Casino into its host environment (what Wynn refers to as “Urban Wynn”) by entering into marketing and usage alliances with existing entertainment venues (e.g., TD Garden) and product (e.g., Boston Pops).
- Using Wynn’s proprietary database to bring new visitors to the Boston area.
- Smoothing out Boston’s seasonal visitor industry by promoting entertainment in traditionally slow periods (e.g., Lunar New Year celebrations in January/February).
- A commitment not to incorporate territorial exclusivity clauses in any agreement with entertainers engaged to perform at the Casino.

It should also be noted that no Impacted Live Entertainment Venue (“ILEV”) petitions were submitted from the City.

Wynn engaged TMG Consulting to prepare a market study and revenue projections for the project. TMG projected that:

- 7.425 million visits to the Casino would generate \$804 million of gaming revenue in 2017.
- 66% of the \$804 million will be generated by Massachusetts residents, a majority of which is already being spent by Massachusetts residents on out-of-state casinos (most of which already offer an array of entertainment).
- Of the 7.425 million visits, some 54% will be generated from “locals” living within a 60-minute drive of the Casino. The remaining visits will be generated from those living within a 200-mile radius but more than 60 minutes away, tourists to Boston, guests at the Wynn Casino hotel as well as vehicles passing through on adjacent highways that elect to visit the Casino.

Finally, Wynn engaged RKG Associates to assess the impact of the Wynn Casino on neighboring communities. RKG focused on employment (and subsequent spending of employment earnings) and direct purchases by the Casino. RKG concluded that off-site purchases by Casino patrons are likely to “be captured by the numerous restaurants,

stores and entertainment venues in downtown Boston, Everett, and neighboring communities.”

5. ISSUES AND CONSIDERATIONS

A belief in demand substitution—this reflects the perception that any dollar spent at a casino (on gaming or non-gaming activities) comes at the expense of existing spending on restaurant, retail, entertainment and service establishments within the same market area.

The Spectrum Report, prepared for the Commonwealth of Massachusetts, found that “there has been very little empirical evidence presented on the issue – either for or against casinos...little general empirical evidence exists on the relationships between casinos and non-gambling industries.”

- o —Wynn proposes to hire 3,123 full-time staff—at an average salary of \$41,500—to support operations. These staff will presumably live in communities throughout the region including Cambridge.

Cambridge businesses (retail, entertainment, cultural etc.) could experience the benefits of an employee’s increased payroll and spending potential generated through casino operations.

- o —TMG Consulting projects more than 3.4 million visits to the Casino from outside a 60-minute drive of the Casino. These new visitors represent a market opportunity for the Cambridge retail, entertainment and cultural establishments.
- o – Wynn is expected to purchase the majority of casino operating supplies and services from regional vendors.

These issues are relevant in assessing the potential negative impacts on businesses in Cambridge.

6. CONCLUSION

CITY POINT PARTNERS LLC

Surrounding Community Impacts – Water and Sewer

Wynn/Everett

City Point Partners LLC

2/13/2014 (Revised 3/14/2014)

including (for Wynn Casino) Saugus and Cambridge, and (for Mohegan Sun Casino) Everett and Somerville.

The MWRA provides the City of Everett with water and wastewater services. The MWRA has ample capacity to meet the additional flow demands resulting from the Wynn Casino as demonstrated by the following table.

	WATER, MGD			WASTEWATER, MGD		
MWRA System	2010	2011	2012	2010	2011	2012
Average Day	204.3	196.6	194.7	357.8	378.8	291.7
Max Day	310.5	307.4	290.1	1261.6	832.7	834.7
Capacity, Avg.			312.0			436.0
Capacity, Peak Day						1,270.0
City of Everett						
Average Day		3.92	3.91		5.22	5.10
Max Day		5.34	5.33		6.24	7.28
Casino (projected)						
Max Day			0.25			0.23
% of MWRA Avg. Capacity			0.08%			0.05%

Generally, any casino impact will be local and will be mitigated by the applicant to assure adequate supply of water and drainage of wastewater via the Everett water distribution and sewage collection systems.

Water: The Wynn Casino will tie into an existing 24-inch City of Everett water main on Broadway. As part of the project, Wynn will relocate an existing 16-inch water line on Chemical Way (Horizon Way) that runs through the site and serves the Gateway Center north of the MBTA tracks. Cambridge has its own water supply and Saugus is supplied separately by the MWRA. There will be no impact to these communities or other nearby or MWRA-served communities.

Wastewater: The impacts of the wastewater contribution from Wynn are slight and will be mitigated. Everett has a separate wastewater and stormwater system. The prime alternative is for Wynn to discharge to the 32 X 36-in sanitary sewer adjacent to the site. This in turn flows to the MWRA DeLauri Pump Station in Everett just south of the Casino entrance on Broadway, which in turn discharges into the MWRA Cambridge Branch Sewer. Under this approach, Wynn is committed to remove 4 gallons of extraneous flow (Infiltration/Inflow) for every gallon of its projected flow contribution. It will achieve this by funding the repairs of leaky sewers elsewhere in Everett. This is a local mitigation which applies to Everett.

A second and alternative would result in a more widespread benefit and contribute to a reduction in combined sewer overflows in the Mystic River. The Cities of Cambridge, Charlestown and Somerville contribute flows to the DeLauri Pump Station. This includes combined flows from these cities (sanitary and storm flows). Under certain rainfall events the DeLauri Pump Station cannot keep up with the flows resulting in the discharge of combined sewage into the Mystic River. In this alternative, Wynn is exploring modifications to the Everett sewer system that would direct the majority of the City’s sewage (including the Wynn contribution) to the much larger capacity MWRA North Metro Relief Sewer. Removing this portion of the City’s flow from the DeLauri Pump Station would reduce overflows from the Cambridge Branch Sewer into the Mystic River and improve water quality. Comment letters responding to the DEIR from MasDEP and MWRA are supportive of this alternative approach. The Secretary’s Certificate requests the FEIR include a more detailed comparison of the two alternatives to support the analysis of the benefits of each.

In conclusion, all of the abutting municipalities are served by the MWRA for wastewater transmission, treatment and disposal. There will be no negative impacts to Cambridge, Saugus, or other communities served by the MWRA from the construction and operation of the Wynn Casino. And further, under the second alternative currently being discussed with Everett and the MWRA, the mitigation performed by Wynn will result in the ability for the DeLauri Pump Station to carry more sewage flows from Cambridge and a reduction of combined sewage discharged into the Mystic River.

Documentation

In addition to the Exhibits attached to the Mohegan Sun RFA-2 Application, the following documents were reviewed:

Wynn

1. Cambridge Notice of Petition for designation as a Surrounding Community (undated)
2. Saugus Petition for designation as a Surrounding Community, January 9, 2014
3. MEPA Secretary's Certificate—DEIR, February 21, 2014
4. Comment letters regarding the MEPA Certificate from the following:
 - a. Somerville, February 11, 2014
 - b. Everett, February 11, 2014
 - c. Boston Office of Gaming Accountability, February 11, 2014

LDS CONSULTING GROUP, LLC

As requested, we are submitting this letter report with respect to the City of Cambridge and Town of Saugus in connection with their petitions to be designated as a “Surrounding Community” with regard to the proposed Category 1 gaming facility by Wynn MA LLC (“Wynn”) in Everett, MA (the “Subject Property”). This letter outlines the steps we took to conduct our analysis as well as our conclusions. The Subject Property will include:

- 500 room luxury hotel
- 167,880 square foot gaming facility (3,072 slot machines and 150 gaming tables)
- 8,150 square feet of retail space
- 57,591 square feet of food and beverage space including six restaurants and a night club
- 34,998 square feet of convention and meeting space
- 13,110 square foot spa and gym
- 5,322 square foot four-season atrium garden
- 310,248 back of house space
- 57,339 square feet front-of-house service space
- 1.25 –million-square-foot parking structure with 2,909 self-serve and valet parking spaces.
- Provision for 800 off-site employee parking spaces accessed via shuttle.

Background

In accordance with the Massachusetts General Laws, c. 23K 17(a) and 205 CMR 125.01(2), any Massachusetts community has the right to petition the Massachusetts Gaming Commission (the “Commission”) for declaration as a Surrounding Community if the community can: 1) Demonstrate negative impact from a gaming development and 2) has requested and been denied Surrounding Community Status by an Applicant. In consideration of a community petition, the Commission must consider various factors and evaluate:

1. The community’s proximity to the host community and the gaming establishment.
2. The impact on transportation infrastructure in the community by the gaming establishment.
3. The noise, traffic and environmental impacts on the community during construction of the gaming establishment.
4. The negative impact the gaming establishment could have on local, retail, entertainment and service establishments in the community.
5. Any other relevant potential impacts to the community.

LDS has been asked to examine potential impacts to housing and schools in each community. Neither petition specifically mentioned these issues as a concern.

Methodology

We have reviewed all or some of the following documents on this matter:

1. Wynn Application

2. RKG Associates report dated August 29, 2013
3. Host Community Agreement
4. Cambridge Petition
5. Saugus Petition
6. Portion of the gaming legislation related to Surrounding Communities
7. Census ACS reports and Esri reports prepared by our office.

Conclusion

Research

Unemployment

We looked at current information available from the Massachusetts Department of Workforce and Labor Development for the communities and Cambridge and Saugus below.

Table 1

Year	Boston	Chelsea	Everett	Malden	Medford	Revere	Total
2013	19,909	1,268	1,404	1,773	1,780	1,833	27,967
2012	20,626	1,262	1,475	1,985	1,738	1,884	28,970
2011	22,101	1,367	1,651	2,245	1,858	2,035	31,257
2010	25,106	1,536	1,756	2,592	2,259	2,286	35,535
2009	24,660	1,473	1,639	2,494	2,287	2,222	34,775
2008	16,609	978	1,102	1,668	1,464	1,499	23,320
2007	13,853	859	940	1,348	1,220	1,238	19,458
2006	15,135	890	1,000	1,435	1,317	1,348	21,125
2005	14,951	927	1,006	1,471	1,291	1,324	20,970
2004	16,410	1,024	1,079	1,621	1,452	1,418	23,004
2003	19,058	1,207	1,361	1,940	1,676	1,703	26,945

Table 2

# of Unemployed Persons -Past 10 Years			
Year	Cambridge	Saugus	Total
2013	2,425	974	3,399
2012	2,540	928	3,468
2011	2,778	1,024	3,802
2010	3,199	1,205	4,404
2009	3,293	1,259	4,552
2008	2,168	788	2,956
2007	1,803	676	2,479
2006	1,925	735	2,660

2005	1,954	736	2,690
2004	2,107	830	2,937
2003	2,484	881	3,365

Housing Vacancy Rates

Table 3 compares housing vacancy rates for the communities from the 2008-2012 ACS.

Table 3 Housing Occupancy and Vacancy

Housing Occupancy & Vacancy				
		Total Housing Units	Occupied Housing Units	Vacant Units
Boston	Number	272,587	248,704	23,883
	Percent		91%	9%
Chelsea	Number	12,549	11,586	963
	Percent		92%	8%
Everett	Number	16,558	15,285	1,273
	Percent		92%	8%
Lynn	Number	36,231	33,655	2,576
	Percent		93%	7%
Malden	Number	24,293	22,836	1,457
	Percent		94%	6%
Medford	Number	23,944	22,751	1,193
	Percent		95%	5%
Revere	Number	20,958	19,522	1,436
	Percent		93%	7%
Total		370,889	340,684	30,205
Avg. Percent			92%	8%

Table 4 Housing Occupancy and Vacancy

Housing Occupancy & Vacancy				
		Total Housing Units	Occupied Housing Units	Vacant Units
Cambridge	Number	48,278	45,087	3,191
	Percent		93%	7%
Saugus	Number	10,583	10,093	490
	Percent		95%	5%
Total		58,861	55,180	3,681

Avg. Percent	94%	6%
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Furthermore, while we have not checked with each individual community on production of new housing units which could add additional product to the market, LDS does keep an informal data base of developments in the pipeline. We have compiled a list of planned, under construction or completed housing developments for the communities of Boston, Cambridge, Chelsea, Malden, Revere, Somerville and Winthrop which shows 30,000 housing units that could be on the market, a summary of which is provided in Table 5 below.

Table 5

Housing Pipeline Tally				
Community	Permit	Planned	Construction	Completed
Boston	3,086	7,945	2,390	1,447
Cambridge	2,954	250	3,206	16
Chelsea			5,596	1,463
Malden		86	371	
Revere		194		
Somerville		14	482	184
Winthrop	27			
Total	6,067	8,489	12,045	3,110

School Age Children/Household Size

We also examined the change in population by age from 2000 to 2010 for ages 0-14 for the two petitioner communities and the host community Everett. We looked at this as an indicator of how many children may be entering the school system in the future.

Table 6

Change in Population 2000-2010			
Ages 0-14	2000	2010	Change
Cambridge	11,391	10,324	-1,067
Everett	6,919	7,843	924
Saugus	4,404	4,088	-316

In January 2014 the Massachusetts Gaming Commission (MGC) received a petition from the City of Cambridge to be designated as a surrounding community by Wynn MA, LLC.

A review of evidence on select social and resource impacts associated with the expansion of gambling

Burden on social services: . For example, a new casino in a small community with limited prior exposure to gambling has a much larger impact than if the casino was introduced in a large city that already had easy access to gambling options to a range of gambling options.

Traffic and intoxicated driving incidents: . Below are three studies that support this:

- Cotti, C. and D.M.Walker. (2010). The Impact of Casinos on Fatal Alcohol-Related Traffic Accidents in the United States, found a strong link between the presence of a casino in a county and the number of alcohol-related fatal traffic accidents. However, the relationship is negatively related to the local-area (county) population.
- Spectrum Gaming Group (2009). Gambling in Connecticut: Analyzing the economic and social impacts. Found a positive correlation between driving-while-intoxicated arrests and legal gambling in Connecticut.
- A study done by Dr. Richard McGowan (2013)^[1] found a positive correlation between drunk driving arrests for a county and the presence of a casino within that same county. Specifically the study concluded that casino gambling can have serious social costs on a community. In a review done by Williams he found two studies that supported a positive correlation between driving while intoxicated and the presence of a casino.

Problem and disordered gambling: One of the main negative impacts of gambling is problem or disordered gambling. There are a host of issues associated with problem gambling. Social impacts include things such as mental health problems, suicide, family/relationship problems and divorce.²

- In 1998, analysis of the U.S. Gambling Impact and Behavior Study data found that location of a casino within 50 miles was associated with approximately double the rate of pathological gambling (Gerstein et al., 1999).
- In a separate U.S. national-level study, Welte et al. (2004) determined that the location of a casino within 10 miles of an individual's home is independently associated with a 90% increase in the odds of being a problem or pathological gambler.
- Shaffer, LaBrie and LaPlante (2004) examined county-level prevalence estimates from the 2000/2001 survey in Nevada in relation to casino availability and found that the four counties with the greatest access to casinos had the highest problem gambling rates, and the four with the least availability had the lowest rates.

Crime: Other studies are simply documenting that increased gambling at an individual level is associated with increased *likelihood* of committing gambling-related crime.

^[1] McGowan, R. (2013). *Casino Gambling and Drunk Driving: How are Communities Impacted?* Gaming Law Review and Economics. November 10, 2013.

² Williams, R.J., Volberg, R.A. & Stevens, R.M.G. (2012). *The Population Prevalence of Problem Gambling: Methodological Influences, Standardized Rates, Jurisdictional Differences, and Worldwide Trends*. Report prepared for the Ontario Problem Gambling Research Centre and the Ontario Ministry of Health and Long Term Care. May 8, 2012. <http://hdl.handle.net/10133/3068>

. Consistent with the notion that increases in crime are partly attributable to increased numbers of problem gamblers, most studies have found increases primarily in property offenses, particularly fraud, embezzlement, theft, and larceny (although two studies actually found reductions in these categories).

. There are many factors other than gambling that can potentially mediate this relationship, such as extensive prior exposure to gambling, a relatively small increase in the availability of gambling relative to population size, a temporal lag whereby crime increases take several years to occur, or the existence of jurisdictional policies that protect against the negative impacts of gambling (e.g., effective programs to prevent problem gambling, limits on the provision of readily available cheap alcohol in venues, enhanced security/policing in casinos, etc.).

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F. APPLICATION

TOURISM DRAW

1-2 Destination Resort

Wynn Resorts, Limited (“Wynn”) is named for its founder and Chairman, Stephen A. Wynn. Mr. Wynn has been widely recognized for his visionary design and style that has come to define the concept of “destination resort.” Mr. Wynn is credited with pioneering the “destination resort” concept, transforming Las Vegas into a world-renowned resort and convention destination. Once again, Mr. Wynn is pioneering a new concept for the industry, which he calls “Urban Wynn.” In assessing the United States regional market, Mr. Wynn envisioned a unique opportunity to change the prevailing model in the regional casino market by adapting the concept of a “destination resort” to recognize and complement the unique aspects of its proposed urban environments. The result, an “Urban Wynn,” attracts both domestic and international visitors to the region by enhancing the unique offerings that the area provides.

The Wynn Resort in Everett embodies the concepts of a “destination resort” and “Urban Wynn” as follows:

- Hotel – A boutique luxury hotel that will target leisure guests, minimizing the impact on Boston’s existing hotels, which tend to be business-centric.
- Casino – A unique amenity in the Greater Boston area designed to attract a broad base of customers, including premium international customers and Everett Massachusetts residents who visit out-of-state casino and entertainment facilities.

- Outdoor public facilities – A redevelopment of Everett’s waterfront, contaminated land that has been inaccessible to the public for many years, that will include a harborwalk, boat landings, and bicycle paths.
- Nightclub – A club modeled after Wynn’s market-leading clubs in Las Vegas, designed to attract locals and national and international visitors.
- Partnerships – Strategic partnerships with existing entertainment facilities, such as TD Garden and the Boston Pops, in an effort to integrate with and promote the cultural offerings of the region.

1-4 Competitive Environments

Wynn’s premium-focused integrated-casino-resort business model, supported by five-star customer service, is a unique competitive advantage that differentiates the company’s properties and drives their consistent and continuing market leadership. Wynn’s existing properties in Las Vegas and Macau, with their iconic designs and paradigm-shifting blend of amenities, generate significant increases in market-wide visitation and revenues while simultaneously minimizing cannibalization of existing businesses. Even as a wave of new competition has opened in Las Vegas and Macau, Wynn’s properties have maintained their market-leading results. Wynn will extend its proven, differentiated operating strategy into the Commonwealth of Massachusetts with the Wynn Resort in Everett, a true destination resort that will establish a sustainable competitive advantage relative to existing and future competition in the Northeastern gaming market.

. Just as it is in Las Vegas and Macau, the Wynn Resort in Everett's integrated product offerings will drive a sustainable competitive advantage relative to smaller pure-gaming facilities that tend to rely on locational convenience for customers, a temporary advantage that fades as new competition opens.

1-6 Collaborative Marketing

Wynn will participate in existing marketing programs driven by the Massachusetts Office of Travel and Tourism, MassPort and the Boston Convention and Tourism Bureau. Specific Wynn marketing programs will also be created with these groups to engage and draw out-of-state tourists, business/group travelers and international visitors.

1-8 Broadening the Region’s Tourism Appeal

The average visitor to a Wynn resort is different than any other in the gaming/leisure industry. Wynn’s reputation for consistently delivering a top-quality experience acquires a broad mix of domestic and international visitors who tend to want more than a standard “gaming experience” at a casino. The average Wynn customer tends to earn more and spend more than standard casino visitors. Wynn’s core customers travel to the company’s properties expecting unique experiences that are memorable, rewarding, and diverse. They want to experience all that a true Wynn-

branded integrated resort has to offer. I The Wynn Resort in Everett’s proximity to and brand alignment with the Commonwealth’s many institutions is, in fact, a market advantage. The successful marketing of Wynn will be the successful marketing of Massachusetts. Both the region and Wynn will benefit from this approach. The demonstrated Wynn model will deliver a higher quality of guest with the highest spending rate per visit—in the Wynn Resort in Everett and throughout the region.

2-24 Customer Cross-Marketing

Wynn plans to cross-market its properties, primarily Wynn Las Vegas, with the Wynn Resort in Everett. Cross-marketing efforts at the Wynn Resort in Everett and Wynn Las Vegas will focus primarily on premium domestic and international customers. Wynn will leverage its industry-leading international marketing organization, which employs 275 people across branch offices located in seven countries, and will market the Wynn Resort in Everett as part of a “US leisure trip” to its international customers, especially its Asian customers. Wynn’s internationally recognized brand name, especially in Asia, will enhance Boston and Massachusetts’ appeal to the premium international leisure consumer and drive incremental visitation from this segment, which tends to have longer lengths of stay and higher per-capita spending. In addition, the Wynn Resort in Everett plans to partner with local businesses in the Everett and Boston areas to create Boston and Massachusetts itineraries for these customers.

2-35 New Revenue

TMG has prepared detailed reports concluding that the Wynn Resort in Everett will have a significant positive economic impact on the Commonwealth of Massachusetts and businesses in the region. Of the Commonwealth of Massachusetts’ approximately \$16.9 billion in annual visitor expenditures, approximately 6% comes from entertainment and recreation. This percentage contribution from the entertainment sector is substantially below other populous states with major metropolitan areas. While this lower relative percentage contribution certainly reflects Massachusetts’, especially Boston’s, position as a strong business and education center, it also highlights the potential for a major entertainment-related venue to enter the market and be complementary to existing businesses. The Wynn Resort in Everett with its unique leisure- and entertainment-driven business model, supported by a combination of unique integrated-casino-resort amenities, five-star customer service, and partnerships with local businesses, largely will be complementary to existing businesses.

2-36 Marketing to Out of State Visitors and use of Junkets

The Wynn Resort in Everett, a true destination resort, will differentiate itself from the increasingly crowded Northeast gaming landscape with five-star customer service and a full complement of luxury gaming and non-gaming amenities. Extending its proven integrated-resort operating strategy in both Las Vegas and Macau, where Wynn earns significant operating premiums relative to its competition, the Wynn Resort in Everett will target and service all customer segments with a particular focus on the high-end leisure customer segment in order to

generate significant premiums in gaming and non-gaming metrics relative to its regional competitors. T

3-27 International Marketing Efforts

With international customers occupying more than 800 rooms per night at Wynn Las Vegas - 20% of its hotel mix - Wynn is the top international gaming destination in the United States (attracting near a million visits from guests outside the United States). More out-of-country visitors recognize and are loyal to the premium Wynn brand than any other gaming resort.

A powerful differentiator in attracting international visitors and revenue to the region is Wynn's industry leading marketing network and global outreach. Wynn has unmatched success in attracting high-net-worth international and domestic visitors through its eight international marketing offices, 32 international affiliated offices and more than 275 marketing personnel and an envied data base of thousands of premier international guests.

In addition, Wynn will seek to form collaborative marketing partnerships with the Massachusetts Office of Travel and Tourism, MassPort and other international tourism groups to support its goal of elevating international tourism in the Commonwealth to record heights.

4-22 Diversified Regional Tourism

The Wynn Resort in Everett will be a signature attraction in Greater Boston and Eastern Massachusetts, centrally located and easily accessible from all major highways that connect the Commonwealth and all of New England. As a new and important part of the Greater Boston and Massachusetts tourism fabric, the company fully embraces the potential opportunities to cross-market with local and regional attractions to increase appreciation for the region. Wynn Resorts will continue to pursue marketing collaborations consistent with the "Wynn" brand that highlight the diverse cultural, historical, and other attractions Massachusetts has to offer. To-date, more than three years before a potential opening, Wynn Resorts has signed or initiated key partnerships and programs including a proprietary "Concierge Program" described in Section 4-21.

MARKET CAPTURE

2-26 Market Analysis

Wynn Resorts believes that its location in Everett in the greater Boston market, combined with its unique, premium-focused destination resort business model, will be significant competitive advantages in making the Wynn Resort in Everett the most-visited and highest-grossing casino (non-Native American) in the United States outside of Las Vegas. The Wynn Resort in Everett will differentiate itself from the increasingly crowded Northeast gaming landscape with five-star customer service and a full complement of integrated luxury gaming and non-gaming amenities.

2-31 Business Plan

The attached Business Plan summarizes Wynn Resorts’ operating strategies for the Wynn Resort in Everett. Wynn Resorts will leverage the company’s extensive development expertise, premium-focused operating strategy, and internationally recognized luxury brand to design, construct, and operate the Wynn Resort in Everett to be the most successful and most visited integrated destination casino resort in the Northeast and United States regional gaming markets. The Wynn Resort in Everett will differentiate itself from the increasingly crowded Northeast gaming landscape with five-star customer service and a full complement of luxury gaming and non-gaming amenities. The Wynn Resort in Everett will target and service all customer segments with a particular focus on the high-end leisure customer segment in order to generate significant premiums in gaming and non-gaming metrics relative to its regional competitors.

2-34 Marketing Plan

The Wynn Resort in Everett will be a destination casino resort—the only one in the Northeast—that will differentiate itself from the increasingly crowded regional gaming landscape with Five Star customer service and a full offering of luxury gaming and non-gaming amenities. Wynn Resorts has created a marketing plan that will communicate the Wynn Resort in Everett’s unique destination resort offerings and wonderful experiences in the most meaningful and tasteful ways. The positioning of the Wynn Resort in Everett as a destination that will deliver a true integrated resort experience is a brand differentiator that will be reflected in all marketing and communication efforts. The marketing plan will target a broad group of customers, with particular focus on the high-end leisure segment that (1) is currently underserved in the Northeast and (2) can be cross-marketed from Wynn Resorts’ existing industry-leading database of domestic and international premium customers.

2-37 Marketing to In-State Visitors

While Wynn sets the standard for drawing guests nationally and internationally, attracting residents who live within the Commonwealth of Massachusetts will be essential to the project’s success. A thorough marketing plan that specifically targets the company’s segmented guest profiles within the Commonwealth will be implemented. Specific tactics within the plan include advertising, direct response, on-line and social marketing, public relations, local sponsorships, event marketing, cross-promotional outreach and more. Wynn does not anticipate incorporating junkets as part of its in-state marketing plan.

To differentiate the Wynn Resort in Everett from other Northeast gaming properties and help maximize the recapture rate of gaming revenue lost from Massachusetts residents to out-of-state gaming establishments, Wynn will highlight the company’s renowned five-star service, full

complement of integrated luxury gaming and non-gaming amenities, and unique location in a major metropolitan market. The Wynn Resort in Everett will be the only five-star integrated destination gaming resort in the Northeast. In addition to gaming, the Wynn Resort in Everett will be a destination where residents can shop, dine and celebrate life milestones in diverse, unique settings in and outside the property. Individuals can partake in unsurpassed spa offerings; families can listen to a free waterfront concert and picnic; and business people can meet and deal. The Wynn Resort in Everett will be a destination location that all will want to experience, and Wynn will promote it to all within the Commonwealth.

3-29 Unique Business and Marketing Strategies

Wynn’s premium-focused strategy, both in gaming and resort amenities, is exclusive in the industry. It arises from a unique ability to create extraordinary service experiences, both on the casino floor and in the hotel, and then market that differentiation with precision to the best customer. In Las Vegas, Wynn generates more gaming revenue than other operator, setting records year-after-year. Yet, the resort also commands the highest hotel ADRs, and nearly 60% of the Las Vegas resort’s overall revenues come from non-gaming sources. No other casino resort operator is able to market to both the luxury resort customer and the premium gaming player with such success and so seamlessly. It is truly a unique business capability of Wynn. Wynn’s Red Card loyalty program and distribution of international marketing offices for gaming, and its Private Access program -- a one-of-a-kind in the industry -- are all critical tools in achieving these results.

4-14 Serving the Surrounding Community

The Wynn Resort in Everett plans on entering into partnerships with local businesses and destinations, including a potential “Best of Boston” restaurant concept, in order to attract visitors who plan on making the Wynn Resort in Everett only part of their stay. In addition, Wynn is actively seeking local and regional partnerships in Everett, its neighboring communities and the region to create an Everett version of its “WE Save” program, a program designed to offer Wynn employees discounts on a wide variety of products and services and stimulate employee spend in the local community. For example, pursuant to its Host Community Agreement with the City of Everett and its Surrounding Community Agreement with the City of Malden, Wynn has agreed to purchase gift vouchers from local businesses within such communities. Wynn intends to use a portion of these vouchers to drive employee spending in such communities

“The proposed Wynn Resort Casino will add a major destination component to the mix of current tourists and visitor venues in the greater Boston metropolitan area, including Everett and neighboring communities, such as Somerville. As a result, the overall customer appeal, or “gravity” of the market is increased and complimented by all, which should stimulate incremental visitation and tourism spend in the area.”

“Based upon the proposed building program and the operations of Wynn Resorts properties, the Wynn Resort in Everett is expected to be unlike any existing casino in the Northeast region or any of the competing applicants for Massachusetts’ Region A casino license in terms of the quality of the integrated casino resort, the diversity of the amenities, and the expected five-star levels of customer service... Extending Wynn Resorts’ operating experience into the Boston area market, the Wynn Resort in Everett will include a hotel and additional amenities that resonate with luxury. Wynn’s differentiated integrated-resort concept and luxury experience will be the key drivers in attracting incremental customers to the area market...”

Similar to Wynn Las Vegas and Macau, the Wynn Resort in Everett will integrate sophisticated architecture, luxurious interior design, and superior entertainment amenities, including a boutique luxury hotel, fine-dining restaurants, premium retail offerings, and convenient meeting facilities, into a cohesive product that will create unique guest experiences that existing (and future) regional gaming competitors cannot match. The full complement of non-gaming amenities will drive the Wynn Resort in Everett’s competitive edge in attracting premium domestic and international gaming customers. The Wynn Resort in Everett will not employ the standard operating strategy used currently by regional casino operators, which is reliant on the targeting of local gaming customers within a 90-minute drive radius through heavy promotional spend.

The Wynn Resort in Everett plans on marketing itself, especially to its international customers who tend to have longer lengths of stay, as a unique destination complementary to the many leisure, cultural, and historical alternatives currently available in a dynamic, culturally rich area. Wynn intends to focus its marketing efforts on (1) the premium gaming market in the Northeast, which Wynn believes is currently underserved by existing facilities in the region, and (2) crossmarketing the property to Wynn Resort’s industry-leading database of international customers.

Leveraging Wynn Resorts’ industry-leading international marketing organization, which employs 275 people across branch offices located in seven countries, Wynn will market the property as part of a “US leisure trip” to its international customers, especially its Asian customers, who tend to make Las Vegas only a small part of their United States itineraries. Mainland China is the fastest growing source of outbound tourism globally, and the Wynn brand is uniquely positioned to capitalize on this trend. With a globally competitive integrated casino resort product with an internationally recognized brand name, especially in Asia, the Wynn Resort in Everett will help enhance Boston and Massachusetts’ already strong appeal to the international consumer. Most of Wynn’s Asian gaming customers travel to the United States with their extended families so positioning the Wynn Resort in Everett as a gaming destination in the diverse, culturally rich Boston and Massachusetts markets (historical sites, museums, fine dining, outdoors activities) will be a key strategy. According to the Greater Boston Convention & Visitors Bureau, current top activities for Chinese visitors include shopping, visiting cultural

attractions, and visiting historical attractions. The Wynn Resort in Everett will position itself as complementary to these activities.

According to the Greater Boston Convention & Visitors Bureau, Boston and Cambridge hosted approximately 1.25 million international visitors in 2012, including 147,000 Chinese visitors. Based on the Wynn Resort in Everett’s target of attracting approximately 10-15% hotel occupancy from international customers, a discount to Wynn Las Vegas’s current 20% international mix, the Wynn Resort in Everett has the potential to attract 20,000 overnight international visitors, including approximately 10,000 overnight Chinese visitors. These targets would represent 1.5% and 7.0% incremental growth in annual international and Chinese visitation, respectively, to Boston and Cambridge. It is important to note that these targeted hotel visitors represent only a portion of expected stimulated international visitation from the Wynn Resort in Everett, as not all international visitors will choose to stay at the Wynn Resort in Everett.

The Wynn Resort in Everett plans on entering into partnerships with local businesses and destinations, including a potential “Best of Boston” restaurant concept, in order to attract visitors who plan on making the Wynn Resort in Everett only part of their stay. In addition, Wynn is actively seeking local and regional partnerships in Everett, its neighboring communities and the region to create an Everett version of its “WE Save” program, a program designed to offer Wynn employees discounts on a wide variety of products and services and stimulate employee spend in the local community. Please see Attachment 4-14-04 WE Save for more information regarding this program. For example, pursuant to its Host Community Agreement with the City of Everett and its Surrounding Community Agreement with the City of Malden, Wynn has agreed to purchase gift vouchers from local businesses within such communities. Wynn intends to use a portion of these vouchers to drive employee spending in such communities.

In addition, the Wynn Resort in Everett will restore the Mystic-River waterfront and “give it back” to the people of Everett and the surrounding communities. The harborwalk will stimulate local visitation for dining, shopping, and general congregation and recreation at the revitalized waterfront. The redevelopment will include an amphitheater and the first public boat landing in Everett, which will provide opportunities for boaters, along with the planned water-taxi service, to access the project from floating docks along the shoreline. The Wynn Resort in Everett has the potential to act as a catalyst in transforming underutilized and contaminated land into an area of environmental and economic revitalization.

WORKING WITH LOCAL BUSINESSES

1-5 Meeting Unmet Needs

The greater Boston area is one of the world’s premier international business hubs. The growth of the convention business has continued to add pressure to a limited supply of hotel rooms in the

greater Boston area, particularly at the upper end of the market. Wynn has more Forbes five-star awards than any other independent hotel operator worldwide and sees this as a wonderful opportunity to build the area's finest hotel and help satisfy the unmet demand in the region while supporting the area's expansion of convention business. In order to achieve the five-star level of service our customers expect, Wynn invests heavily in its employees and their training. Wynn is also one of the largest supporters of education in every location in which it operates. Wynn has partnered with many of Boston's finest attractions, such as the Boston Symphony Orchestra and TD Garden, to collaboratively market new and unique experiences to its customers. Physical connection will be aided by running regular water shuttles connecting the Wynn Resort in Everett to major tourist centers of Boston, specifically the convention center, Faneuil Hall, the Aquarium and North End

3-15 Local Suppliers

. The foregoing is reflected in Wynn's commitments set forth in its host and surrounding community agreements. Prior to the filing of this RFA- 2 application, Wynn has demonstrated a commitment to Commonwealth-based consultants. Upon receipt of a gaming license, Wynn will accomplish this commitment through the use of vendor fairs, active outreach to local Chambers of Commerce and pre-screening of potential vendors.

3-16 Local Business Owners

Wynn Resorts is committed to supporting the local business community through a robust local procurement program for the Wynn Resort in Everett, including training initiatives to enable local businesses to grow and compete for these opportunities. If the desired item is not available locally, Wynn will work with local distributors to bring the item to the market. All procurement contracts are competitively bid. Although the region is well equipped to capture this business, following the award of a gaming license, Wynn will partner with local Chambers of Commerce and other interested organizations to support the growth and expansion of local businesses in its host and surrounding communities.

3-17 Assisting Businesses

During the development phase of the Wynn Resort in Everett, Wynn Resorts will develop a detailed vendor procurement program that specifies goods and services that the Wynn Resort in Everett will require. Following the development of this procurement program, Wynn will host vendor fairs specifically targeted to business owners in its host and surrounding communities for the purpose of informing such business owners of its needs and the details of its procurement process. To the extent that a particular item is not available in the region, Wynn will facilitate introductions between local distributors and the manufacturer of such item. In the case of services that are not available within the region, Wynn will work with current operating businesses in developing their expertise to provide the required services.

3-18 Promoting Regional Businesses

The Wynn Resort in Everett will be complementary to existing business and will utilize the following means to promote regional businesses:

(1) Wynn Supplier Program.

(2) Cross-Marketing. Through co-promotional relationships with the myriad of regional attractions available in the Commonwealth, Wynn will stimulate incremental visitation to the greater Boston area and help drive tourism to other regions of the Commonwealth. Wynn has developed a proprietary “Concierge Program” specifically for the Wynn Resort in Everett.

(3) Regional Development. Wynn will support regional initiatives such as Boston’s bid to host the 2024 Summer Olympic bid.

(4) Indirect Business Promotion. Built in a single phase instead of spread out over a decade or more, the \$1.59 billion the Wynn Resort in Everett will be among the largest private developments ever built in the Commonwealth, providing the most jobs and generating the most economic stimulus in the shortest amount of time relative to potential competitors.

3-19 Vendor Supplied Goods

Pursuant to the terms of its Host Community Agreement and Surrounding Community Agreement (with the City of Malden), Wynn has committed to utilize qualified local vendors.

3-20 Minority, Women, and Veteran Businesses

A key component of Wynn Resorts’ five-star service levels is the company’s ability to establish and maintain strong relationships with its vendor partners. Wynn Resorts believes in partnerships based foremost upon the abilities of vendors to meet the company’s high standards of service.

Wynn Resorts’ Supplier Diversity objectives are to: (i) actively and routinely seek out qualified minority-owned and women-owned business enterprises that can provide competitive and high quality commodities and services in a competitive market; (ii) encourage participation and support of supplier diversity by major suppliers to Wynn Resorts who are not minority-owned or women-owned businesses; and (iii) seek out opportunities to assist in the development and competitiveness of MWBEs through instruction, mentoring, and other outreach activities.

Wynn Resorts’ strategy is not goal-specific; instead, the overall strategy is to create fair opportunities for MWBE, Veteran and LBE firms. The company’s approach for design and construction suppliers is to identify opportunities that create direct subcontracting relationships with MWBE firms with the general contractor. Such opportunities are created by structuring bid packages that allow for first-tier/direct subcontracting by MWBE firms. Wynn intends to engage MWBE firms from the communities surrounding the Wynn Resort in Everett and to institute a “buy local” program for all general conditions purchasing for the Wynn Resort in Everett.

3-21 Projected Benefit for Regional Businesses

3-24 Local Agreements

In addition to Wynn’s existing database of domestic and international customers, Wynn Resorts plans to enter into a comprehensive series of local agreements to maximize cross visitation to the properties. Several local agreements and programs that are already in place - and others that can only be pursued after Wynn is awarded a gaming license—will firmly connect Wynn with the many cultural, dining, historic, entertainment and natural attractions of the Commonwealth and increase overall tourism traffic to the Commonwealth. These agreements and programs will make regional venues and attractions easily accessible to Wynn guests and will link them to the company’s database of high-end travelers.

Existing agreements include (i) a cross-promotional and community outreach agreement with TD Garden, (ii) a cross-promotion and sponsorship agreement with the Boston Symphony Orchestra, and (iii) an agreement to sponsor a water transportation study to be conducted by The Boston Harbor Association and the Boston Harbor Island Alliance (in collaboration with other interested public stakeholders).

3-25 Cross Marketing

Wynn will also dedicate resources for overall marketing expenditures to cross-market and support programs driven by the Massachusetts Office of Travel and Tourism, MassPort and the Greater Boston Convention and Visitors Bureau. Specific Wynn marketing programs will also be created with these groups to engage and draw Massachusetts guests, regional tourists, business/group travelers and nationwide travelers. Collaboration will include utilizing Wynn’s eight international marketing offices to promote Massachusetts tourism and host outreach events.

3-26 Collaboration with Tourism and Other Industries

With nearly a half a million luxury-focused, high-worth out-of-state guests annually, Wynn Las Vegas is the top luxury destination gaming resort in the United States. Wynn guests travel further and more often to visit Wynn resorts, have a higher net worth and want to experience all that the destination has to offer. Wynn’s distinct business advantage is to collaborate with organizations that strengthen regional tourism and define the Massachusetts brand.

Upon receipt of a gaming license, Wynn will seek to partner with major local and regional tourism groups - including the Massachusetts Office of Travel and Tourism, Greater Boston Visitors and Convention Bureau and MassPort - to support Wynn’s goal of elevating domestic and international tourism to record heights. Agreements have already been reached with TD Garden, the Boston Symphony Orchestra and the Boston Harbor Association. Wynn is seeking agreements with others to increase cross visits and spending at regional attractions. Partnerships

will be sought with MassChallenge, the Mystic River Association, and MassDevelopment to help support overall economic and educational development in the Commonwealth.

4-21 Tourism Diversity

The Wynn Resort in Everett will be the only true five-star integrated destination casino resort in the Northeast and will draw the highest amount of premium high-net-worth travelers nationally and internationally. Much thought has been given to satisfying the varied and eclectic tastes of the guests and linking them to the many dining, shopping, historic, cultural, sports and other attractions the region and state has to offer.

Agreements have already been reached with TD Garden and the Boston Symphony Orchestra for cross-promotional activities. Others will be sought to increase cross-visitation and spending at regional attractions. Through its “Concierge Program,” the Wynn Resort in Everett will partner with regional restaurants, retailers, entertainment venues, cultural attractions and more to offer its guests the best access to these diversified regional offerings. Pursuant to its Host Community Agreement and its Surrounding Community Agreement with the City of Malden, Wynn has agreed to a \$50,000 and \$25,000 annual purchase, respectively, of gift vouchers from local businesses within such communities. Wynn intends to use a portion of these vouchers to drive employee spending in such communities.

Wynn anticipates being able to generate visitation through its product and service experiences, and hopes to minimize any reliance on bus programs, if any are employed at all.

HIRING

1-7 Diverse Workforce and Supplier Base

At Wynn, the diversity of our employees, their different life experiences and their individual perspectives all contribute to the exceptional level of guest service for which Wynn is uniquely known. Wynn is committed to the continuing development of a workforce made up of men and women from different cultures, ethnic groups and generations. This commitment serves the needs of our community and enables us to build an inclusive culture strengthened by a team with a variety of skills, abilities and talents. Wynn is incredibly excited about the opportunity to engage people of all cultures and backgrounds – as employees, vendors and partners – to produce a destination resort and gaming establishment of which the Commonwealth of Massachusetts will be proud. Wynn’s track record of success, ability to recruit the most talented people in the industry and its diverse and talented leadership make Wynn the ideal partner to help build a new economic sector for the Commonwealth.

3-2 Employees

Job opportunities at the Wynn Resort in Everett will be varied across a vast array of professions and industry sectors and will require all ranges of skill and experience levels. Including a 25%

factor for taxes and benefit, total “all-in” payroll-and-benefit compensation equals \$170.2 million, or approximately \$51,750 per employee.

Wynn recognizes that its employees are the single-most important factor in enabling Wynn to distinguish itself from its competitors. As a result, unlike other employers in the gaming industry, Wynn did not and will not resort to layoffs and restructurings during economic downturns. Instead, Wynn invest in its employees through a combination of competitive compensation packages, benefits and extensive training.

3-4 Job Opportunities and Training for Unemployed or Underemployed

Wynn commissioned RKG Associates (“RKG”) to prepare a report on the impact of the Wynn Resort in Everett on the City of Everett and its surrounding communities.

Wynn is committed to hiring residents from its host and surrounding communities and providing necessary training prior to and following the opening of the Wynn Resort in Everett. Through the development of thousands of new jobs, training and recruiting, Wynn is confident that it will have a significant positive impact on high unemployment and underemployment in the region.

3-5 Experience with Hiring Unemployed and Underemployed

Wynn Resorts has always strived to create a diverse workforce and hire from areas characterized by high unemployment or underemployment. At its properties in Las Vegas, Wynn Resorts has utilized recruitment and training efforts to ensure that it provides job opportunities and extensive career training and development to those who are unemployed or underemployed. These efforts include (i) the utilization of recruitment partners who specialize in diversity, (ii) specific recruitment outreach programs to reach unemployed or underemployed groups, (iii) leadership and skills training, (iv) tuition reimbursement and seminar assistance, (v) internal career counseling, (vi) citizenship classes, and (vii) ESL classes.

3-6 Plan for Workforce Development

Wynn Resorts’ commitment to workforce development is supported by the terms of the Host Community Agreement with the City of Everett. In the Host Community Agreement, the company has committed to provide a hiring preference to properly qualified residents of the City of Everett and to afford such residents the opportunity to be trained for such trade/craft position through all training opportunities offered by Wynn Resorts or its affiliates.

In addition, Wynn has entered into a Surrounding Community Agreement with the City of Malden pursuant to which Wynn has agreed to give preferential treatment (secondary to residents of Everett) to qualified Malden residents seeking employment at the Wynn Resort in Everett. Wynn is prepared to extend this secondary preferential treatment to other surrounding communities that voluntarily enter into a surrounding community agreement with Wynn. Unlike other operators, Wynn Resorts does not have another operating property in a nearby state. Therefore, the company recognizes the need to develop a robust training program both internally,

and in collaboration with other available local resources, to develop a workforce pool that will enable the company to fulfill its obligations under the Host Community Agreement.

ECONOMIC IMPACT

RKG Neighboring Community Report

Municipal Services

- City Municipal Services: The Developer has agreed to fund \$5 million per year as an impact fee to the City of Everett. In RKG's opinion, the actual additional costs that the City will incur as a result of providing municipal services to the resort casino, will be approximately \$2.5 - \$3.5 million annually.

TMG Report

Based upon the proposed building program and the operations of Wynn Resorts properties, Wynn Everett is expected to be unlike any existing casino in the Northeast region or any of the competing applicants for Massachusetts' Region A casino license in terms of the quality of the integrated casino resort, the diversity of the amenities, and the expected five-star levels of customer service.

The Wynn facility, while still capturing a large share of gaming visits and revenues from the region, will not be a standard locals-driven casino for a casual crowd as typically found in most US regional gaming markets. Extending Wynn Resorts' operating experience into the Boston area market, Wynn Everett will include a hotel and additional amenities that resonate with luxury. Wynn's differentiated integrated resort concept and luxury experience will be the key drivers in attracting incremental customers to the area market and in Wynn Everett's doors.

REVENUES

HOTEL

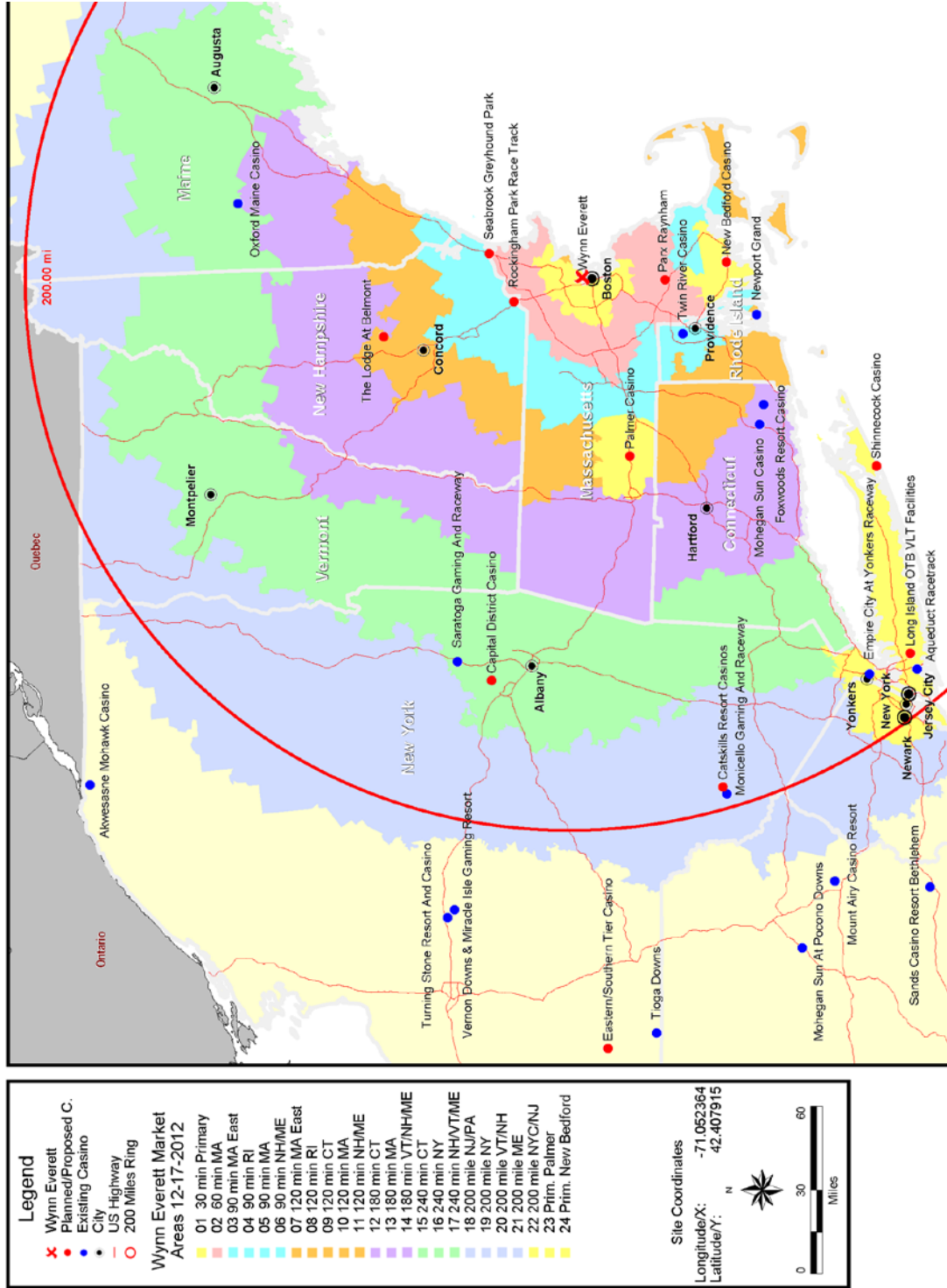
Wynn Everett will operate as a casino hotel, but will benefit somewhat from the significant tourist visitation to the area. The hotel is expected to be a boutique luxury property, targeting primarily high yield gamers, both domestic and international. Wynn Everett hotel is not expected to be directly competitive with existing luxury hotel properties except for those in the leisure market segment.

JOBS

TAXES

Additionally, the City of Everett could expect to receive approximately \$30.9 million in one-time tax and fee revenues from developmental expenditures and negotiated fees, and the Commonwealth could expect to receive approximately \$152.5 million in one-time tax and fee revenues.

Wynn Everett, Massachusetts



Data Source: Pitney Bowes Business Insight

Prepared by TMG Consulting, October 2013

TMG Consulting’s gravity model forecast for Wynn Resorts’ capture of gaming revenues from the local area market is over \$639 million. The following table details the projections of visitation and revenue generation by submarket.

Wynn Everett Gravity Model Visitation and Revenue Projections: 2017

Submarket	Visitation	Revenue
1 30 Min Primary	3,056,080	\$355,435,001
2 60 min MA	974,990	\$118,523,618
3 90 min MA East	37,931	\$3,851,945
4 90 min RI	312,798	\$27,890,031
5 90 min MA	136,051	\$13,150,926
6 90 min NH/ME	210,042	\$24,726,793
7 120 min MA East	30,332	\$3,271,558
8 120 min RI	57,962	\$6,841,120
9 120 min CT	40,764	\$4,049,321
10 120 min MA	10,257	\$846,281
11 120 min NH/ME	88,801	\$8,232,988
12 180 min CT	139,007	\$14,424,189
13 180 min MA	23,720	\$2,039,840
14 180 min VT/NH/ME	49,570	\$4,373,799
15 240 min CT	22,016	\$3,469,522
16 240 min NY	26,440	\$2,976,597
17 240 min NH/VT/ME	42,787	\$3,242,757
18 200 mile NJ/PA	17,878	\$2,582,388
19 200 mile NY	44,593	\$4,358,976
20 200 mile VT/NH	5,766	\$507,840
21 200 mile ME	14,590	\$1,116,763
22 200 mile NYC/NJ	240,172	\$26,570,851
23 Prim Palmer	31,485	\$2,361,121
24 Prim New Bedford	57,125	\$4,420,843
Total	5,671,157	\$639,265,071

Source: TMG Consulting

The table below shows the combined win from domestic overnight visitors and international visitors to Boston/Cambridge that are forecast to visit the Wynn Everett facility. The projected win of these visitors is expected to be \$59 million annually. However, over \$11 million of these revenues are accounted for in the forecast for hotel-related gaming revenues.

**Wynn Everett:
Area Tourist Capture and Revenue Forecast**

2011 Visitors to Boston/Cambridge	21,200,000
Capture Rate	6.2%
Gaming Visits	1,314,400
Win/Visit	\$45
Win	\$59,568,901
(Less Local Hotel Market Capture)	-\$11,649,298
Tourist Gaming Revenues	\$47,919,603

Source: Greater Boston Convention and Visitors Bureau; TMG Consulting

. This assumption is based on operating data from Wynn Las Vegas, and the casino’s demonstrated ability to draw significant revenues from select high-end casino gamers worldwide. These revenues are in addition to those forecast by TMG Consulting, and reflect an assumption contingent upon Wynn Resorts’ ability to successfully capture prolific gamers from across the world at the new facility.

**Wynn Everett:
High Yield International
Gaming Visits and Revenue**

Visits	1,427
Win	\$71,755,170

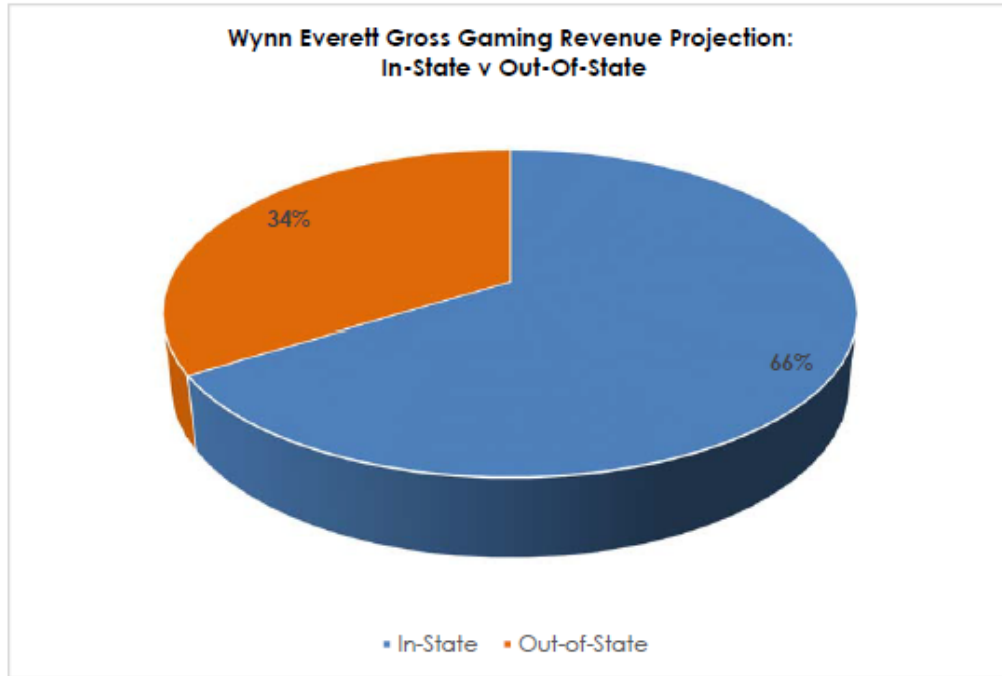
Source: Wynn Resorts; TMG Consulting
Analysis

Considering the potential gaming revenues from the local market, coupled with those from the on-site hotel, Boston’s tourist population, drive-by traffic, and induced international high-yield gamers, the Wynn Resorts facility could potentially generate over \$804 million in gaming revenues in its first full year of stabilized operations.

**Wynn Everett:
Total Gaming Revenue Projection**

	Visits	Gaming Revenues
Local Market	5,671,157	\$639,265,071
Overnight Guests	402,467	\$113,354,339
Tourism	1,273,131	\$47,919,603
Traffic Intercept	78,130	\$3,515,840
TOTAL	7,424,884	\$804,054,853
Win/Visit	\$108	
Positions	3,900	
Win/Position	\$565	

Source: TMG Consulting



Source: TMG Consulting

Wynn Everett Gross Gaming Revenue Projections by Segment and Origin

	In-State	Out-of-State	Total
Gravity Model Local Market	\$503,901,135	\$135,363,936	\$639,265,071
Overnight Guests	\$11,700,838	\$101,653,500	\$113,354,339
Tourism	\$15,621,791	\$32,297,812	\$47,919,603
Traffic Intercept	\$1,146,164	\$2,369,676	\$3,515,840
TOTAL	\$532,369,927	\$271,684,925	\$804,054,853

Source: TMG Consulting

The City of Everett can expect to receive approximately \$28.6 million in tax and fee revenues annually per its negotiated Host Community Agreement with Wynn and from recurring impacts attributable to the Wynn facility. The Commonwealth could expect to receive approximately \$238.0 million annually in tax and fee revenues.

**Wynn Everett: New Recurring
Tax and Fee Revenue Impacts, 2017 (in millions)**

Category	Local Tax Impact	State Tax Impact
From Wynn Everett Operations		
Gaming Tax & Fees	-	\$204.5 M
Sales & Use (includes F&B)	\$0.4 M	\$10.2 M
Hotel	\$2.6 M	\$2.5 M
Business	-	\$6.9 M
Payments in Lieu of Taxes to City of Everett	\$25.3 M	-
Indirect Tax Revenue Impacts	\$0.3 M	\$13.8 M
From Incremental Tourism		
Sales & Use (includes F&B)	\$0.004 M	\$0.1 M
Indirect Tax Revenue Impacts	\$0.002 M	\$0.1 M
Total Annual Tax Impact	\$28.6 M	\$238.0 M

Source: Operating assumptions provided by Wynn Resorts; Massachusetts Department of Revenue; Bureau of Economic Analysis; TMG Consulting Analysis

2-35 New Revenue

TMG has prepared detailed reports concluding that the Wynn Resort in Everett will have a significant positive economic impact on the Commonwealth of Massachusetts and businesses in the region. As a destination resort not only unique to Massachusetts but also superior to and more conveniently located than existing casinos in the region, the Wynn Resort in Everett will (1) stimulate incremental visitation to the area, (2) recapture gaming and entertainment-related revenues currently being spent in neighboring states, and (3) create significant increases in household earnings and consumer-discretionary spending, all of which will combine to drive positive increases in visitation and revenues for Massachusetts businesses as a whole. Of the Commonwealth of Massachusetts' approximately \$16.9 billion in annual visitor expenditures, approximately 6% comes from entertainment and recreation. This percentage contribution from the entertainment sector is substantially below other populous states with major metropolitan areas. While this lower relative percentage contribution certainly reflects Massachusetts', especially Boston's, position as a strong business and education center, it also highlights the potential for a major entertainment-related venue to enter the market and be complementary to existing businesses. The Wynn Resort in Everett with its unique leisure- and entertainment-driven business model, supported by a combination of unique integrated-casino-resort amenities, five-star customer service, and partnerships with local businesses, largely will be complementary to existing businesses.

2-18 Revenue Generation

Wynn Resorts engaged TMG Consulting ("TMG") to complete the market and socioeconomic impact assessments for the Wynn Resort in Everett. According to TMG's report: "A new casino development of the proposed scale in Everett will have an enormous impact on tax revenue for the Commonwealth of Massachusetts and for the City of Everett. New tax and fee revenues will be generated from on-site activities including gaming, retail, food and beverage sales, hotel rentals, gross revenues generated, and from taxable purchases made by operations. Additionally, the increase in earnings attributable to the facility is expected to result in increased collections of state and local taxes and fees."

Based on TMG's analysis, the Wynn Resort in Everett will generate \$28.6 million in tax and fee revenues for the City of Everett and \$238.0 million in tax and fee revenues for the Commonwealth of Massachusetts in its first full year of stabilized operations. On a one-time basis (prior to the opening of the Wynn Resort in Everett), TMG projects that the City of Everett will receive \$30.9 million in one-time tax and fee revenues from the Wynn Resort in Everett and the Commonwealth of Massachusetts will receive \$152.5 million in one-time tax and fee revenues, including the upfront gaming-license fee.

2-19 Projected Gaming Revenue

TMG, based on its analysis of the regional gaming markets and Wynn Resorts’ historical operating performance, has projected the Wynn Resort in Everett’s gross gaming revenues (“GGR”). These GGR projections imply that the Wynn Resort in Everett would be the highest grossing casino (non-Native American) in the United States (outside of Las Vegas), generating significant revenue premiums to casinos in Pennsylvania, New Jersey, New York, and Maryland. Based on TMG’s projections, “nearly two-thirds” of these revenues are expected to be re-captured revenues that are currently accruing to out-of-state casinos. The Wynn Resort in Everett facility should be capable of generating a significant premium to the average win per position in the region, with the unique advantage of attracting “high-yield” gamers to the facility.

TMG estimates that Wynn’s gross gaming revenue in years 1-5 in the Average (Base) case will total approximately \$4.0 billion.

2-20 Projected Non-Gaming Revenue

Wynn Resorts believe its industry-leading commitment to driving non-gaming revenues helps differentiate the company’s properties, establishes lasting competitive advantages, insulates the company from economic downturns relative to its more gaming-focused competitors. The Wynn Resort in Everett will not employ the standard operating strategy used currently by regional casino operators, which is reliant on the targeting of local gaming customers within a 90-minute drive radius through heavy non-gaming/non-cash promotional spend. Wynn Resorts believes that its industry-leading percentage of non-gaming revenues in Las Vegas not only reflects its commitment to the integrated-resort operating philosophy but also has driven its financial out-performance relative to its Las Vegas peers since the trough of the economic downturn in 2009.

2-21 Projected Tax Revenue to the Commonwealth

TMG projects that the Wynn Resort in Everett will generate tax revenue to the Commonwealth (gaming, sales, etc.) for the first five years of operations on a best, average and worst case basis as follows:

Average (Base) Case: \$1.25 billion over 5 years

Best Case: \$1.46 billion over 5 years

Worst Case: \$825 million over 5 years

2-27 Capital Investment

In accordance with 205 CMR 122.00, the total capital investment in the Wynn Resort in Everett is projected to be \$1.225 billion. This amount exceeds the “minimum capital threshold” of \$500 million by \$725 million, or 145%, reflecting Wynn Resorts’ premium destination resort development strategy. The property will open in a single phase, ensuring that amounts currently budgeted for construction are spent in full in advance of/during the opening. Wynn believes that its premium development strategy, which can cost more to develop and execute, enables the company to offer a differentiated, premium-focused product that drives superior revenue performance. In Las Vegas and Macau, Wynn properties earn 185% and 145% fair-share

premiums, meaning its properties earn 85% and 45% more in revenue than its share of gaming units in each market.

2-32 Maximum Facility Use

Gaming and entertainment activity and hotel occupancy in the Northeast and regional markets is characterized by seasonality with weak “shoulder” periods in the winter months. As in Las Vegas, Wynn Resorts will design a globally-sourced entertainment schedule, host a range of international celebrations, including Chinese New Year’s and Brazilian Independence Day events, and corporate group meetings, among other initiatives, to help mitigate potential seasonal impacts at the Wynn Resort in Everett. The wide array and premium nature of Wynn Resorts’ events will help differentiate its special-event offerings relative to its out-of-state competitors, stimulating incremental visitation. The property will host other seasonal-themed events during the winter and spring months (traditionally slower periods for regional tourism and hotel occupancy) to drive visitation and revenue throughout the year.

3-1 Studies and Reports

TMG Consulting and RKG Associates have each prepared detailed reports concluding that the Wynn Resort in Everett will have a significant positive economic impact on the Commonwealth of Massachusetts and businesses in the region. As a destination casino resort not only unique to Massachusetts but also superior to and more conveniently located than existing casinos in the region, the Wynn Resort in Everett will (1) stimulate incremental visitation to the area, (2) recapture gaming and entertainment related revenues currently being spent in neighboring states, and (3) create significant increases in household earnings and consumer discretionary spending, all of which will combine to drive positive increases in visitation and revenues for Massachusetts businesses as a whole.

3-28 Other Amenities

The Wynn Resort in Everett sits upon a waterfront site that has remained dormant and surrounded by locked barbed wire fences for more than 100 years. The project will serve as the catalyst to remediate the site and open up the waterfront. The harbor, which was once covered with two feet of grey foam, will be dredged and purified using the most effective, state of the art procedures and managed by international leaders in this highly specialized field.

As custodians of this waterfront gem, Wynn is firmly committed to promoting the use and enjoyment of this newfound seashore by all. Only an integrated urban resort of Wynn’s scope provides the economic means to fund such a massive transformation. In addition to the hotel, gaming, restaurants and in-house entertainment, other attractions and amenities include (i) a harborwalk providing public access to the waterfront; (ii) water transportation; (iii) pedestrian access; (iv) a winter garden; and (v) a collection of fine art.

3-33 Entertainment and Athletic Events

Steve Wynn is internationally renowned for his use of entertainment as a resort draw. It was Mr. Wynn who first introduced Cirque du Soleil to Las Vegas audiences and created the iconic Bellagio Dancing Water Show, Treasure Island Pirate Show, Wynn Lake of Dreams and more. More than 18,000 people visit Wynn Las Vegas each day just to see the free attractions and entertainment in the resort.

The Wynn Resort in Everett will feature a spectacular waterfront esplanade and shoreline amphitheater to hold intimate concerts and host events. However, Wynn's strategy is not to compete with existing sports and entertainment venues in the region. The goal is to feed into them. That is why Wynn has partnered with TD Garden, the Boston Symphony Orchestra and other iconic locations to serve as its de facto sporting and entertainment locations.

4-11 Non-Gaming Amenities

Stephen A. Wynn, Chairman and Chief Executive Officer of Wynn Resorts, pioneered the integrated destination casino resort business model, and the Wynn Resort in Everett will represent the next phase in the evolution of this model. Similar to Wynn Las Vegas and Macau, the Wynn Resort in Everett will integrate sophisticated architecture, luxurious interior design, and superior entertainment amenities, including a boutique luxury hotel, fine dining restaurants, premium retail offerings, and convenient meeting facilities, into a cohesive product that will create unique guest experiences that existing (and future) regional competitors cannot match. The full complement of non-gaming amenities will drive the Wynn Resort in Everett's competitive edge in attracting premium domestic and international gaming customers.

4-15 Entertainment Venues

The Wynn Resort in Everett was intentionally designed to not include any competitive entertainment facilities. Rather, Wynn has entered into strategic partnerships with existing entertainment facilities such as TD Garden and the Boston Pops in an effort to integrate with the cultural offerings of the region.

4-19 Quality of Amenities

According to TMG's market analysis for the Wynn Resort in Everett, "Based upon the proposed building program and the operations of Wynn Resorts properties, the Wynn Resort in Everett is expected to be unlike any existing casino in the Northeast region or any of the competing

applicants for Massachusetts’ Region A casino license in terms of the quality of the integrated casino resort, the diversity of the amenities, and the expected five-star levels of customer service... Extending Wynn Resorts’ operating experience into the Boston area market, the Wynn Resort in Everett will include a hotel and additional amenities that resonate with luxury...”

The hotel at the Wynn Resort in Everett will offer a boutique luxury experience with rooms that average 800 square feet, which are significantly larger than existing Boston luxury hotel rooms. The hotel will compete with local Boston-area hotels in the luxury segment; however, unlike most luxury existing Boston-area hotels, the hotel at the Wynn Resort in Everett will focus on the leisure segment (as opposed to the business/group segment) and will stimulate and create a significant portion of its own demand through its international and domestic casino marketing offices. For example, TMG estimates that the average Boston luxury hotel generates only 25% of its room demand from the leisure segment. The hotel at the Wynn Resort in Everett is projected to generate 80% of its demand from the complementary leisure segment.

4-33 Stimulating Retail Activity

As a unique integrated destination casino resort in the greater Boston area, the Wynn Resort in Everett will attract incremental visitation and discretionary spending to the Boston area.

5-2 Impacts and Costs

Wynn Resorts has commissioned studies from TMG Consulting and RKG Associates to calculate (1) the potential costs to the local and surrounding communities and (2) the local and regional social, environmental, traffic, and infrastructure impacts. As evidenced by its signed agreements with and contracted “Community Impact” payments to the host and local communities, Wynn Resorts is committed to the mitigation of any potential social, environmental, traffic, and environmental impacts on the local and regional communities from the construction and operation of the Wynn Resort in Everett.

In addition to these studies, Wynn prepared a Draft Environmental Impact Report (“DEIR”) which was filed with the Massachusetts Office of Energy and Environmental affairs on December 13, 2013. The DEIR highlights the project’s potential traffic and environmental traffic impacts, mitigation strategies, and consistency with local and regional planning and development initiatives.

The below excerpts summarize the results of these studies:

. See Attachments 5-02-02 RKG Neighboring Comm Report and 5-02-03 RKG Everett Report. Key conclusions from the RKG report:

- Employment and Wages. “The proposed resort casino will create significant positive impacts on employment and wages in the City of Everett and the neighboring

communities of Malden, Medford, Somerville, Chelsea, Revere and Boston... Based on RKG’s analysis of commuting patterns, the City of Everett and neighboring community residents will likely make up the majority of the employment... This analysis assumes that most groceries and other food is purchased locally, as are many other retail goods such as drug store purchases, some hardware, gasoline and so on.”

- Direct Local Spending. “... While the Developer’s purchasing initiatives are not known in full detail at this time, the vast majority likely will be sourced from local providers including businesses located in Everett, Malden, Medford, Somerville, Chelsea, Revere and Boston. This local spending will support additional jobs and result in additional local taxes.”
- Off-Site Consumer Spending. "The proposed Wynn Resort Casino will add a major destination component to the mix of current tourist and visitor venues in the greater Boston metropolitan area, including Everett and neighboring communities, such as Somerville. As a result, the overall customer appeal, or "gravity" of the market is increased and complimented by all, which should stimulate incremental visitation and tourism spend in the area."
-
- City-Municipal Services. "The Developer [Wynn Resorts] has agreed to fund \$5 million per year as an impact fee to the City of Everett to mitigate any additional municipal services costs associated with the new resort casino. It should be noted that large scale projects largely impact the host city for municipal services. In RKG's opinion, the actual additional costs that the City will incur will be closer to \$2.5 - \$3.5 million. The resort casino will utilize its state of the art construction, in house security systems along with a large security team to offset some portion of the additional municipal services. The ability for the City of Everett to fund the costs with guaranteed payments from the Developer is rare and a significant benefit to this project and the neighboring communities."

(2) TMG Consulting Inc. (“TMG”). . See Attachments 5-02-04 TMG Regional Business Benefits, 5-02-05 TMG Report and 5-02-06 TMG Executive Summary.

(3) Draft Environmental Impact Report. Wynn Resorts submitted a Draft Environmental Impact Report (“DEIR”) to the Massachusetts Office of Energy and Environmental affairs on December 13, 2013. The DEIR highlights the project’s potential traffic and environmental traffic impacts, mitigation strategies, and consistency with local and regional planning and development initiatives. Vanasse & Associates, Inc. and Howard/Stein-Hudson Associates, Inc. prepared the traffic analyses. .

MITIGATION

3-14 Local Business Promotion

Wynn Resorts' development philosophy is to build integrated resorts that help transform and elevate the markets in which the resorts are located, becoming an integral part of their communities. In Massachusetts, the Wynn Resort in Everett will be a positive transformative catalyst to the economic health of Everett and the surrounding cities. Key to this transformation will be the integrated promotion of local businesses of all types, sizes and ownerships to stimulate cross-visitation and economic activity. The Wynn business model fully aligns with the goals of the Commonwealth and the communities that the Wynn Resort in Everett will be a part of. Wynn is fully committed to supporting local businesses by not only stimulating activity in the area but also sourcing goods and services directly from the local communities. The foregoing is reflected in Wynn's host and surrounding community agreements pursuant to which Wynn has committed to purchase \$75,000 of vouchers from local businesses each year and to provide local vendors with a preference. Wynn has also entered into cross-promotion agreements in furtherance of its commitment to support local businesses.

3-30 Regional Economic Plan Coordination

The Wynn Resort in Everett, as a transformative environmental and economic catalyst for the Mystic-River waterfront redevelopment in Everett, will be designed and constructed in harmony with local and regional long-range planning efforts that have focused on the neglected portion of the Mystic River waterfront that contains the project site. Wynn has reviewed a number of planning studies and initiatives that include the proposed Wynn Resort in Everett site including (i) the Everett Waterfront Assessment, (ii) the Mystic River Master Plan, (iii) the Lower Broadway District Master Plan, (iv) the Boston Metropolitan Planning Organization's Long-Range Transportation Plan, Paths to a Sustainable Region, (v) the MAPC Planning Studies, and (vi) the Everett Central Waterfront Municipal Harbor Plan, (vii) .

Wynn Resorts is working closely with the City of Everett, surrounding cities, state agencies, and local and regional planning organizations to ensure coordinated, comprehensive planning related to the site and the studies listed above. While differing in their geographical scope and authorship, these plans have consistently identified the project site as a location with tremendous potential for transformation. The project is strongly aligned with the extensive planning work that has been accomplished over many years and will continue to take guidance from those plans as it moves through the design, construction, and operation phases.

5-6 Mitigation

Pursuant to the terms of the Host Community Agreement between Wynn MA and the City of Everett (please see Attachment 5-04-01 Everett HCA), Wynn has committed to mitigate known impacts from the development and operation of the proposed Wynn Resort in Everett. Mitigation will take the form of financial commitments, workforce development opportunities, promotion of

local businesses, city services, local cultural involvement, transportation improvements, and community involvement.

A. Financial Commitments

- (1) City of Everett Costs: The City of Everett's reasonable and direct costs of (i) determining the impacts of the proposed Wynn Resort in Everett, (ii) negotiating the Host Community Agreement and related agreements, (iii) holding a ballot election, (iv) communicating with/ appearing before the Commission, (iv) preparing and presenting amendments to the City's ordinances and other necessary legislative enactments, and (v) participating in other permitting activities and proceedings relative to the proposed Wynn Resort in Everett.
- (2) Community Enhancement Fee: \$30 million during the construction phase of the proposed Wynn Resort in Everett for capital improvement projects to be identified by the City of Everett.
- (3) Annual Community Impact Fee: \$5 million per year (increased by 2.5% per annum) for a community impact.
- (4) PILOT Payment (in lieu of real and personal property taxes): During the operation of the Project, an annual community payment of \$20 million (increased by 2.5% per annum).
- (5) Meals and Hotel Tax Revenues: Estimated proposed rates of .75% for local meals and 6% for hotel/room occupancy.
- (6) Motor Vehicle Excise Tax: Excise tax on all vehicles owned by it and used in connection with the proposed Wynn Resort in Everett.
- (7) Permit Fees: The City of Everett's actual, reasonable costs incurred in connection with the review and inspection of permit and license applications, construction and utility plans. In addition, following the opening of the proposed Wynn Resort in Everett, Wynn will pay all permitting, inspection and other municipal fees in connection with the maintenance, repair, expansion and operation of the proposed Wynn Resort in Everett.

B. Workforce Development

- (1) Construction Jobs: Preferential hiring treatment for qualified Everett residents for contracting, subcontracting and servicing opportunities.
- (2) Permanent Jobs: Preferential hiring treatment for qualified Everett residents for permanent jobs. Everett residents will have the opportunity to participate in training opportunities for trade and craft positions provided by Wynn MA.
- (3) Local Vendors: Good faith effort to utilize local contractors and suppliers for the construction and future operations of the proposed Wynn Resort in Everett.

C. Promotion of Local Businesses

- (1) Purchase of Vouchers and Gift Certificates: Wynn MA is committed to purchasing and issuing at least \$50,000 in vouchers and gift certificates from Everett businesses.

D. City Services

- (1) Electricity: Wynn MA is required to pay for electric power supply and the actual cost to upgrade existing electric facilities to provide electric power service to the proposed Wynn Resort in Everett.
- (2) Natural Gas: Wynn MA is required to pay the actual costs to upgrade existing gas transmission facilities to provide service to the proposed Wynn Resort in Everett.
- (3) Water and Sewer: Wynn MA is required to pay all water and sewer connection fees and monthly service charges and assume all costs to the City of Everett to construct water

infrastructure improvements required to expand the water system to provide water service to the proposed Wynn Resort in Everett.

E. Environmental Remediation

- (1) Remediation of Site: Wynn MA is required to diligently pursue the remediation of the proposed Wynn Resort in Everett project site.
- (2) Public Access: Wynn MA will create public access to waterfront as part of its development consistent with the City of Everett’s Lower Broadway Master Plan and the City of Everett’s vision for the waterfront.

F. Local Cultural Involvement

- (1) Art/Local Artists: Wynn MA is committed to working with the City of Everett to include features or programs in the proposed Wynn Resort in Everett for the benefit of the arts and local artists.

G. Transportation

- (1) Infrastructure Impacts: Wynn MA has committed to study the impacts that will be caused by the construction and operation of the proposed Wynn Resort in Everett, with a particular emphasis on potential effects on traffic patterns.
- (2) Specific Transportation Improvements: Wynn MA has committed to certain transportation- related improvements for the following locations: (i) project access, (ii) Broadway between Route 16 and the primary Project driveway, (iii) Route 16 at Santilli Highway and Mystic View Road (a.k.a. Santilli Circle), (iv) Route 16 at Broadway and Main Street, and (v) Lower Broadway Truck Route.
- (3) Public Transportation Access: Wynn MA has committed to provide certain public transportation enhancements involving shuttle bus service, MBTA bus stops, water shuttle service, a “touch-and-go” dock, pedestrian and bicycle access, and potentially the provision of a stop on the MBTA Commuter Rail system.

H. Community Involvement

- (1) Everett Citizens Foundation: Wynn MA has agreed to make an annual payment of \$250,000 to support an Everett Citizens Foundation that will be in charge of supporting and promoting local groups, associations and programs with important City initiatives.
- (2) Responsible Gaming: Wynn will implement its responsible gaming plan at the proposed Wynn Resort in Everett to enable those people who cannot game responsibly the assistance they need.

5-17 Mitigation

Pursuant to the terms of the Surrounding Community Agreement between Wynn MA and the City of Malden (please see Attachment 5-14-01 Malden SCA), Wynn has committed to mitigate any adverse impacts from the development and operation of the proposed Wynn Resort in Everett. As a result, Wynn MA has agreed to mitigation in the form of financial commitments, workforce development opportunities, promotion of local businesses, city services, local cultural involvement, transportation improvements, and community involvement, as described in more detail below.

A. Financial Commitments

(1) Transportation Hub Infrastructure Costs: Upon the award of a gaming license, a onetime payment of \$500,000. Following the opening of the proposed Wynn Resort in Everett, an annual payment of \$325,000.00 (with an increase of 2.5% per annum), with an additional adjustment on the 5th annual payment. In addition, Wynn MA has agreed to make an annual payment of 100,000 (with an increase of 2.5% per annum), to enable Malden to assist businesses in effectuating aesthetic upgrades and enable them to participate in the opportunities that will be available as a result of the use of Malden as a “transportation hub.”

(2) Transitional Roads Payment: Upon the award of a gaming license, a one-time payment of \$300,000.00 for roadway improvements on all transitional roads in preparation for the proposed Wynn Resort in Everett, which shall include aesthetic, quality, signage and safety improvement. In addition, Wynn MA has agreed to make an annual payment of \$225,000.00 (with an increase of 2.5% per annum), to enable Malden to make certain roadway improvements, as needed, to address aesthetic, quality, signage and safety needs.

(3) Public Safety Payment: Upon the award of a gaming license, a one-time payment of \$200,000 for increased police, fire, traffic and public works personnel to maintain roadway safety due to increased use as a result of the City of Malden acting as a “transportation hub” for the proposed Wynn Resort in Everett. In addition, Wynn MA has agreed to make an annual payment of \$250,000.00 (with an increase of 2.5% per annum) to enable Malden to fund staffing and other public safety initiatives related to increased pedestrian and vehicular traffic in the City of Malden.

(4) Community Fund Payment: An annual payment of \$100,000.00 to provide ongoing support to the many important non-profit organizations throughout the City of Malden.

B. Workforce Development

(1) Construction Jobs: Subject to Wynn MA’s obligations to the City of Everett, preferential treatment to qualified Malden residents for contracting, subcontracting and servicing opportunities in the development and construction of the Project.

(2) Permanent Jobs: Subject to Wynn MA’s obligations to the City of Everett, preferential hiring treatment for qualified Malden residents for permanent jobs.

C. Promotion of Local Businesses

(1) Vendor Development: Wynn MA has committed to use good faith efforts to purchase at least \$10,000,000 of goods and services from vendors with a principal place of business in Malden.

(2) Purchase of Vouchers and Gift Certificates: Wynn MA has committed purchase and issue at least \$25,000 in vouchers and gift certificates annually from local businesses for use in its customer loyalty programs.

D. Transportation

(1) Specific Transportation Improvements: Wynn MA has committed to working with the City of Malden and other interested neighboring communities to commission a permanent improvements study of the Wellington Circle, and will fund such study and up to 25% of the concept design (up to \$1,000,000 for the agreed upon approach). Following the completion of the study and design, Wynn MA will cooperate with efforts by the City of Malden and other interested neighboring communities to seek funding from the Transportation Infrastructure and Development Fund (estimated to be capable of yielding in excess of \$200 million) for a permanent solution for Wellington Circle. Pending completion of the study and design, Wynn MA will fund and undertake interim improvements to Wellington Circle, as more particularly set forth in its proposed traffic plan.

OTHER

2-28 Total Investment Outside the Property

The Wynn Resort in Everett will be a transformative catalyst for the City of Everett and the Commonwealth of Massachusetts. This one project will substantially transform the Lower Broadway section of Everett from a vacant, contaminated industrial site to a new, vibrant, and economically viable and publicly accessible waterfront development. The project will create thousands of jobs, stimulate billions of dollars in trade, and transform abandoned and contaminated land into an environmentally and economically sustainable operation that likely will stimulate incremental investment into the area.

Appropriate and adequate utilities are available for the Wynn Resort in Everett in the immediate area, all with connections in the Broadway corridor. Wynn Resorts will work to connect to, and in some cases upgrade, these utilities. Key components of the utility program include the following:

4-30 Minimizing Noise and Lighting

4-35 Regional Water Facilities

4-36 Sewage Facilities

The City of Everett has separate systems for the sanitary sewers and storm drains. Sewer service and treatment for the City of Everett are provided by the Massachusetts Water Resources Authority (MWRA) with treatment at the Deer Island Treatment Plant. Please see Attachment 4-36-02 Existing Sewer System plans from the City of Everett’s Engineering Division and the MWRA indicate an existing city-owned 32”x36” sanitary sewer in Route 99 adjacent to the Project Site. The sanitary sewer lateral from the Wynn Resort in Everett is expected to connect to the existing 32”x36” sanitary sewer in Route 99. This sanitary sewer has a flow full capacity of approximately 5.8 million gallons per day (MGD) based on a slope of 0.00025 foot/foot. Wastewater flows were calculated for the proposed Wynn Resort in Everett using the preliminary facility program and unit wastewater flows in gallons per day per unit are assigned based on 314 CMR 7.00, 310 CMR 15.00, and comparisons to similar facilities. The estimated maximum daily wastewater flow from the Wynn Resort in Everett is expected to be 228,428 gallons per day (gpd) of wastewater. The project will generate a maximum daily flow of 0.23 MGD (4% of the pipe capacity) with an expected peak hour flow of 0.46 MGD (8% of the pipe capacity).

Most sanitary flows generated in Everett are carried by one of three pipes over Section 193 (a 126” diameter pipe) of MWRA’s North Metro Relief Sewer near Sweetser Circle. These flows tie into the City of Everett’s 32”x36” sanitary sewer in Broadway. This pipe continues in a southwesterly direction and ultimately ties into the Cambridge Branch of the MWRA’s Metro Sewer (an 80”x72” culvert) just downstream of the DeLauri Pump Station and about 450 feet southwesterly of the Project Site. This sewer routing has a couple of apparent drawbacks. A majority of the City of Everett’s sanitary sewer flows tie into the Cambridge Branch Sewer, which has less capacity than the North Metro Relief Sewer, and the flows join the MWRA’s system just downstream of the DeLauri Pump Station possibly impeding the pump station’s flows.

Wynn is working with the MWRA and the City of Everett to determine if modifications to the sanitary sewer system can be made that would direct a majority of the City’s sanitary sewer flows into Section 193 of the North Metro Relief Sewer. These modifications will not only reduce flows to the Cambridge Branch Sewer but also preliminary modeling suggests that this improvement will lower the hydraulic grade line in the Cambridge Branch Sewer while having a minimal effect on the North Metro Relief Sewer.

4-66 Security of Premises

The Wynn Security Department prides itself on its extensive reach and capabilities of its physical security. Wynn intends to implement a substantially similar security program as it currently utilizes at its properties in Las Vegas. Wynn’s proactive approach to minimizing unlawful behavior has resulted in the creation of several teams within the department many of which are industry leading. As a department, the teams that Wynn employs greatly deter and reduce unlawful activity. The security department also follows industry best practices in regards to use of force.

Wynn fully cooperates with law enforcement’s and other agencies’ lawful request for information. Lastly, Wynn takes great care when dealing with lost or abandoned minors. Depending on the situation and the minor’s age, they are taken to the security manager’s office where attempts are made to contact the minor’s parents or guardians. If no contact can be made with parents or guardians, local law enforcement and child protective services are contacted.

4-67 History of Security

Wynn has established extensive policies and procedures with respect to its security. It has also invested heavily in the training of its security personnel. Wynn is the industry leader in terms of security policies and procedures and, as a result, has an excellent record of preventing unlawful activities at its properties.

As Wynn does in Las Vegas, the security protocols implemented at the Wynn Resort in Everett will be reviewed on a regular basis to ensure that they protect the safety and security of employees, guests and the surrounding community.

5-31 Treatment and Prevention

5-36 Housing

In addition, according to a report from RKG Associates, attached as Exhibit 5-33-06:

“Because it is believed that most of the employees at the Wynn Resort in Everett will be drawn from Everett, the neighboring communities and the greater Boston metro area, there will be little measurable impact on housing markets. However, the increase in direct and indirect incomes and expenditures will contribute positively to the overall economy of the Commonwealth and the housing sector in general.”

5-37 School Population

Notwithstanding, Wynn has met with, and will continue its discussions with, Superintendent Frederick Foresteire of the Everett Public Schools to monitor any impact on the school system.

In addition, Wynn is also one of the largest supporters of education in every location in which it operates. Wynn will fulfill its commitment to education in the City of Everett and its neighboring communities.

5-38 Emergency Services Available

. Discussions have been held with the Police Chief and Fire Chief regarding public safety issues related to the Wynn Resort in Everett. While both departments are comprehensive, sophisticated organizations, additional training and equipment will be necessary to ensure they are prepared for emergency and routine events at the Wynn Resort in Everett. In addition to these services, the gaming legislation requires the establishment of a new Gaming Enforcement Unit within the State Police with exclusive policing jurisdiction over the casino. It is envisioned that the State Police unit will closely coordinate with the Everett police and Wynn on-site staff. The presumption is that Wynn's security staff, working with State and Everett police, will handle the bulk of the daily on-site security and/or emergency needs of the property.

As the project evolves through the design and construction process, significant coordination will continue with the police, fire, and EMS services to ensure a fabric of prevention and response is in place on opening day. The size, nature, and complexity of the proposed facility will be different than what the Everett and Commonwealth personnel are familiar with. For example, the high-rise hotel and underground parking garage present evacuation and firefighting challenges that the existing staff and equipment are not yet fully prepared for. Planning and practice drills will be conducted initially and continuously to ensure proper public safety.

.

G. OTHER

5. OTHER

Legal Framework

In determining whether a community is a surrounding community, the commission . . . will evaluate whether: . . . The community will be significantly and adversely affected by any other relevant potential impacts that the commission considers appropriate for evaluation based on its review of the entire application for the gaming establishment. 205 CMR 125.01(2)(b)(5)

Executive Summary

N/A

A. COMMUNITY PETITION

No relevant documents

B. APPLICANT RESPONSE

No relevant documents

C. RPA ANALYSIS

No relevant documents

D. DEIR ANALYSIS

No relevant documents

E. CONSULTANT ANALYSIS

No relevant documents

F. APPLICATION

No relevant documents

G. OTHER

6. POSITIVE IMPACTS

Legal Framework

In determining whether a community is a surrounding community the commission may consider any positive impacts on a community that may result from the development and operation of a gaming establishment. 205 CMR 125.01(2)(c)

Executive Summary

Community Petition

No relevant documents

Applicant Response

From Wynn Everett Surrounding Community Analysis, Jan. 29, 2014

“Saugus Community Impacts”

Estimated Impacts from Wynn Everett on Saugus

Earnings Impact/ Population and Distance Estimate: \$2,865,290

Source: U.S. Census; U.S. Department of Commerce; TMB Consulting analysis

Transcript

Pg. 94, Mr. Gordon

7 This is an economic impact as
8 Suzanne talked about earlier. This shows about
9 \$11 million positive economic impact. So,
10 instead of it being a negative impact, we view
11 as quite a positive, which of course wouldn't
12 be mitigated.

A. COMMUNITY PETITION

No relevant documents

B. APPLICANT RESPONSE

RKG Neighboring Community Report

Economic Planning and Real Estate Consultants

IMPACT OF THE WYNN RESORT CASINO ON NEIGHBORING COMMUNITIES

AUGUST 29, 2013

Prepared for: Wynn MA, LLC , 3131 Las Vegas Boulevard South , Las Vegas, Nevada 89109

Prepared by: RKG Associates, Inc.

Economic, Planning and Real Estate Consultants , 634 Central Avenue , Dover, New Hampshire 03820

Wynn Casino Resort - Everett, MA

Impact on Neighboring Communities

This report presents RKG's fiscal and economic analysis of the potential impacts of the proposed Wynn Resort Casino on the communities adjacent to the City of Everett. There will be significant, positive indirect economic impacts on the neighboring communities from the one-time and ongoing employment and potential incremental local spending generated by the project.

The Massachusetts Environmental and Policy Act (MEPA) set forth a very specific and defined process for addressing all environmental impacts including traffic and transportation. Wynn MA LLC has retained a number of consultants to adhere with this process and address these impacts, including Fort Point Associates the lead environmental consultant and Vanasse & Associates to address traffic impacts. Wynn MA LLC has already provided an extensive preliminary study to MassDOT and its neighboring communities. After receiving additional comments and information, the Developer intends to file a more comprehensive analysis this fall and a final proposal in the Spring of 2014. This is consistent with the MEPA process.

Based on its fiscal and economic analysis, RKG highlights the following key benefits:

Municipal Services

- **City Municipal Services:** The Developer has agreed to fund \$5 million per year as an impact fee to the City of Everett. In RKG's opinion, the actual additional costs that the City will incur as a result of providing municipal services to the resort casino, will be approximately \$2.5 - \$3.5 million annually.

1. Employment & Wages

The proposed resort casino will create significant positive impacts on employment and wages in the City of Everett and the neighboring communities of Malden, Medford, Somerville, Chelsea, Revere and Boston

The proposed resort casino is estimated to create approximately 3,200 - 4,000 jobs. For this analysis we have assumed 3,627 full-time equivalent employees when fully operational, along with 5,155 employees during the 2-3 year construction process. This level of employment and spending will indirectly support an incremental 6,658 new jobs within the state and regional economy (4,867 during construction and 1,791 long-term). The salaries and wages paid to these employees (direct and indirect) are estimated to total over \$718 million during the construction

phase and over \$304 million annually once the project is operational. It is important to note that the majority of these wages will go to residents of the six adjacent cities and that a significant percentage of these wages will be spent in the community, creating an economic “multiplier” impact throughout the local economies.

In order to estimate employment and wage impacts, RKG collected and analyzed baseline statistics on employment conditions in the City of Everett and three comparative areas including:

- The neighboring cities of Malden, Medford, Somerville, Chelsea and Revere,
- the City of Boston, and
- the Boston Metro Region, which for this analysis includes Essex, Middlesex, Norfolk and Suffolk counties, combined.

RKG then utilized American Community Survey (2007-2011) data from the U.S. Census Bureau to quantify the size of the local labor force and the composition of that labor force. Key data used by RKG included: the number of employed persons in each city, the work locations of local workers, the home locations of those workers holding jobs in the local communities, and the variations in these statistics by major industry sector.

The following findings were identified from a review of the data, as described in more detail in the tables below and those that follow in the Appendix:

- Over 100,000 unemployed persons resided in the rest of the Boston Metro Region
- Everett and the neighboring cities (excluding Boston) were exporters of labor, namely more persons lived in these cities than the number of local jobs at businesses located there. In comparison, Boston was the reverse, as more persons had jobs at local businesses than the workforce that resided in Boston.
- Combined, Everett and the adjacent cities (excluding Boston) exported over 11,300 resident workers in the arts, entertainment, recreation and accommodations and food service industry, while Boston imported over 12,000 workers in this sector.

The analysis then estimates the ongoing employment at the resort casino, by place of residence of the workers. RKG assumed that 95% of the ongoing employment will be filled with local workers (5% filled from outside the local area), resulting in an estimated 3,463 workers to be hired locally, as indicated in Table 1 below.

Applying the average annual wage for these workers by sector / occupation, results in a total of nearly \$154 million in annual wages, which would generate annual state income tax receipts of slightly more than \$6 million, as indicated in Table 1 below.

Table 1 – Estimated NET New Local and Ongoing Employment

Sector or Use	Total Direct Employment	Out-of-Region Employment	Net Local Direct Employment	Avg. Annual Wage	Total Wages (\$ mil.)	Estimated Tax Receipts (\$ mil.)
Operating	3,287	(164)	3,123	\$41,459	\$129.46	\$4.99
Construction	340	0	340	72,072	24.50	1.05
Total	3,627	(164)	3,463	\$44,464	\$153.97	\$6.03

Sources: TMG Consulting, Wynn Resorts, and RKG associates, Inc.

(1) Assumes that 5% of Total Direct Employment will be out of region.

TMG Consulting, Wynn Resorts, and RKG associates, Inc.(1) Assumes that 5% of Total Direct Employment will be out of region.

Many of the estimated 3,463 net new local jobs likely will be allocated to Everett residents (due to the hiring preference indicated by Wynn MA LLC) as well as the neighboring communities. Based on RKG's analysis of commuting patterns, the City of Everett and neighboring community residents will likely make up the majority of the employment.

The analysis also estimated the wages associated with the net new employment, by location, as well as estimating local spending impacts and indirect statewide wages.

Based on numerous studies of consumer spending patterns, RKG estimates that between 10% and 15% of income is spent on food and other retail goods and services. This analysis assumes that most groceries and other food is purchased locally, as are many other retail goods such as drug store purchases, some hardware, gasoline and so on. Also, personal services such as barbers, nail salons and dry cleaning are purchased locally. RKG estimated that between \$15 and \$23 million in local wages likely will be spent in the local communities.

It is important to note that the \$15-\$23 million does not include the impact on local spending during the construction phase of the project. Many of the construction workers employed at the site will live in Everett and the six neighboring cities, and a portion of the wages paid to them, which in turn support additional job and wages in the economy, will be spent at the local level. During construction, local spending in Everett and the abutting communities will be significant. For example, if each of the estimated 5,155 construction workers spent an average of \$5 per day on lunch, gas and other convenience-style items, total local spending would be on the order of more than \$6 million over the 2-3 year construction period. This will directly benefit many retail and service businesses in the adjacent cities.

Since construction workers tend to be somewhat more mobile than full-time workers, these impacts may be spread out over a larger geography than estimated for the operational employment above.

2. Direct Local Spending

In addition to the local spending resulting from the direct employment, the proposed resort casino will purchase tens of millions of dollars of goods and services each year from a variety of sources – many of which will include local businesses – to support its non-gaming operations. The project, once fully operational, is anticipated to generate annual non-gaming revenues of \$150 million. Purchases of goods to support these operations likely will be in the \$40-50 million range annually. While the Developer's purchasing initiatives are not known in full detail at this time, the vast majority likely will be sourced from local providers including businesses located in Everett, Malden, Medford, Somerville, Chelsea, Revere and Boston. This local spending will support additional jobs and result in additional local taxes.

3. Potential Off-Site Consumer Spending

The proposed Wynn Resort Casino will add a major destination component to the mix of current tourist and visitor venues in the greater Boston metropolitan area, including Everett and neighboring communities, such as Somerville. As a result, the overall customer appeal, or “gravity” of the market is increased and complimented by all, which should stimulate incremental visitation and tourism spend in the area.

To what extent the economic activity and consumer spending at the resort casino will stimulate spend in the neighboring communities is difficult to estimate, as a review of the literature uncovers state-level research that is generally inconclusive. However, it is generally conceded that the typical tourist/visitor to a resort casino “spends” across several sectors not just the gaming sector.

The following table presents information on the typical distribution of tourist/visitor spending, averaged among resort casino patrons in Las Vegas and the Mississippi Gulf Coast. Approximately 70% of the average visitor’s budget to these two destinations is spent on non-gaming amenities.

Table 2 – Typical Spending Distribution among Resort Casino Tourists/Visitors

Average Daily Tourist / Visitor	Average of Las Vegas, NV and Gulf Coast, MS	
	\$	% of total
Gaming / gambling	\$123	30%
Lodging	98	24%
Shopping	46	11%
Food and drink	68	17%
Transportation	41	10%
Entertainment	28	7%
Total	\$403	100%

From the information in the preceding Table 2, the typical resort/casino patron spent slightly under \$125/day on gaming and gambling, representing 30% of their daily expenditures. Another \$45/day was spent on shopping and nearly \$70/day on food and drink, with \$30/day on other entertainment. Some of this non-gaming/gambling spending will likely occur on-site at the resort casino; however, some likely will be captured by the numerous restaurants, stores, and entertainment venues in downtown Boston, Everett, and the neighboring communities.

The distribution of the non-gaming/gambling spending, by community, would be speculative at best, and more so for a specific destination. However, using Assembly Row/Square as an indicative example, given its proximity to the proposed resort casino, it is reasonable to assume that some spill over will occur at local retail establishments. The RKG analysis conservatively estimates that approximately 1.0%-3.0% could occur at Assembly Row/Square, indicating incremental sales potential of \$3.0+ million annually at this specific location from resort casino tourists/visitors.

4. Impact on Housing

Because it is believed that most of the employees at the Wynn Resort Casino will be drawn from Everett, the neighboring communities and the greater Boston metro area, there will be little measurable impact on housing markets. However, the increase in direct and indirect incomes and expenditures will contribute positively to the overall economy of the Commonwealth and the housing sector in general.

5. City-Municipal Services

The Developer has agreed to fund \$5 million per year as an impact fee to the City of Everett to mitigate any additional municipal services costs associated with the new resort casino. It should be noted that large scale projects largely impact the host city for municipal services. In RKG's opinion, the actual additional costs that the City will incur will be closer to \$2.5 - \$3.5 million. The resort casino will utilize its state of the art construction, in house security systems along with a large security team to offset some portion of the additional municipal services. The ability for the City of Everett to fund the costs with guaranteed payments from the Developer is rare and a significant benefit to this project and the neighboring communities.

Appendix:

Everett, Adjacent Community, and Boston Labor Demographics

Table 3 – Everett & Comparative Areas: Labor Force

Statistics (2010)

	Everett	Surrounding Cities [1]	Boston	Metro Area [2]
Population 16 years and over	33,087	232,141	518,562	2,934,154
Civilian labor force	23,747	164,523	355,317	2,021,514
Employed	21,289	150,435	319,146	1,868,765
Unemployed	2,458	14,088	36,171	152,749
% Unemployed	10.4%	8.6%	10.2%	7.6%
Not in labor force	9,326	67,413	162,835	909,853
% not in labor force	28.2%	29.0%	31.4%	31.0%
Armed Forces	14	205	410	2,787
[1] Includes Malden; Medford; Somerville; Chelsea & Revere				
[2] Essex; Middlesex; Norfolk & Suffolk Counties				
Source: American Community Survey (2007-2011) & RKG Associates, Inc.				

Table 4 – Everett: Worker in Residence and Places of Work (2010)

WORKERS IN RESIDENCES & GEO OF WHERE WORKS				JOBS IN PLACE & GEO FROM WHERE WORKERS RESIDES			
Workers in Residence #	Workplace of Everett Workers in Residence #		% of Residence	Local Jobs in #	Jobs in Everett Held by Workers from #		% of Jobs
Everett 21,195	Everett	3,090	14.6%	Everett 13,230	Everett	3,090	23.4%

	Boston	5,849	27.6%		Boston	1,308	9.9%
	Chelsea	611	2.9%		Chelsea	539	4.1%
	Revere	434	2.0%		Revere	818	6.2%
	Malden	1,442	6.8%		Malden	946	7.2%
	Medford	896	4.2%		Medford	513	3.9%
	Somerville	702	3.3%		Somerville	521	3.9%
	Everett Surr. Cities	9,934	46.9%		Everett Surr. Cities	4,645	35.1%
	Essex County	1,216	5.7%		Essex County	1,934	14.6%
	Rest of Middlesex Co.	5,406	25.5%		Rest of Middlesex Co.	2,182	16.5%
	Norfolk County	739	3.5%		Norfolk County	407	3.1%
	Rest of Suffolk Co.	323	1.5%		Rest of Suffolk Co.	125	0.9%
	Rest of Boston Metro	7,684	36.3%		Rest of Boston Metro	4,648	35.1%
	Total	20,708	97.7%		Total	12,383	93.6%
Source: ACS (2006-2010) & RKG Associates, Inc.							

WORKERS IN RESIDENCES & GEO OF WHERE WORKS JOBS IN PLACE & GEO FROM WHERE WORKERS RESIDES

Table 5 – Everett & Comparative Geographies: Comparison of Workers in Residence & Jobs in Place Employment by Industry

Industry Sector	Everett			Surrounding Cities [1]			City of Boston		
	Workers in Residence	Jobs in Place	Diff-erence	Workers in Residence	Jobs in Place	Diff-erence	Workers in Residence	Jobs in Place	Diff-erence
Construction	1,821	1,048	(773)	8,373	5,293	(3,080)	10,240	24,668	14,428
Manufacturing	1,859	734	(1,125)	10,406	5,749	(4,657)	14,432	17,480	3,048
Wholesale trade	438	1,197	759	3,920	3,368	(552)	5,103	7,436	2,333
Retail trade	1,836	1,943	107	14,719	9,174	(5,545)	27,170	32,057	4,887
Transportation and warehousing, and utilities	1,206	756	(450)	5,637	5,164	(473)	9,983	23,036	13,053
Information	220	24	(196)	3,776	2,021	(1,755)	8,902	15,912	7,010
Finance and insurance, and real estate and rental and leasing	1,606	1,868	262	10,570	5,162	(5,408)	31,035	79,907	48,872
Professional, scientific, and management, and administrative and waste management services	2,634	727	(1,907)	23,493	7,707	(15,786)	48,334	88,602	40,268
Educational services, and health care and social assistance	4,174	2,554	(1,620)	38,853	26,033	(12,820)	98,317	161,811	63,494
Arts, entertainment, and recreation, and accommodation and food services	2,678	1,279	(1,399)	15,701	5,861	(9,840)	35,845	47,884	12,039
Other services, except public administration	1,927	959	(968)	8,835	5,868	(2,967)	14,871	21,311	6,440
Public administration	881	313	(568)	5,761	5,109	(652)	14,484	33,758	19,274
Total	21,280	13,402	(7,878)	150,044	86,509	(63,535)	318,716	553,862	235,146
[1] Includes Malden; Medford; Somerville; Chelsea & Revere									
Source: American Community Survey (2007-2011) & RKG Associates, Inc.									

From Wynn Everett Surrounding Community Analysis, Jan. 29, 2014:

“Saugus Community Impacts”

Estimated Impacts from Wynn Everett on Saugus

Earnings Impact/ Population and Distance Estimate: \$2,865,290

Source: U.S. Census; U.S. Department of Commerce; TMB Consulting analysis

From transcript (1/29/2014)

pg. 88, Suzanne Leckert

21 In our study, which you should have

22 all received a copy of some time ago, we

23 projected 5144 new jobs or rather FTEs

24 throughout the state, 3287 direct 1858 indirect

p. 89, Ms. Leckert

1 and induced FTEs throughout the
2 Commonwealth.

3 In addition, \$270 million in new
4 earnings. \$136 million are attributed to
5 direct onsite earnings at the Wynn Everett
6 facility, and another \$134 million indirect and
7 induced earnings throughout the Commonwealth.

p. 89, Ms. Leckert

15 Commonwealth. So, what we did was following
16 the commitments made by Wynn Resorts, we
17 assumed that 75 percent of all of the induced
18 and indirect impacts would be felt within about
19 a 30-minute drive of the Wynn Everett facility.
20 That's about 1400 of the indirect and induced
21 jobs. And a little bit over \$203 million of
22 the earnings being shared by those living

23 within a 30-minute drive of the Wynn Everett
24 facility.

p. 94, Mr. Gordon

7 This is an economic impact as
8 Suzanne talked about earlier. This shows about
9 \$11 million positive economic impact. So,
10 instead of it being a negative impact, we view
11 as quite a positive, which of course wouldn't
12 be mitigated.

13 So, finally, our conclusion on
14 Cambridge with all due respect is that it
15 wouldn't be designated as a surrounding
16 community because we couldn't identify any
17 impact and certainly not anything significant
18 and adverse as the legislation requires.

C. RPA ANALYSIS

N/A

D. DEIR ANALYSIS

N/A

E. CONSULTANT ANALYSIS

TMG Report

Summary

Wynn Everett is expected to benefit regional businesses in the tri-county area consisting of Middlesex, Suffolk, and Norfolk Counties. Wynn's expenditures in the local economy are expected to spur further expenditures, and, ultimately, receipt of additional gross revenues at regional businesses. In Year 1 of the Base Case Scenario, Wynn Everett and the regional businesses are expected to generate \$938.48 million in additional gross revenues due to Wynn Everett's effect on the local economy. We include Wynn Everett's direct expenditures in total output because Wynn Everett will be a regional business. The table below details TMG's projections for increases in gross revenues at regional businesses by operating scenario.

Projected Gross Revenue Increases at Regional Businesses
by
Scenario, Five Year
Projection

Scenario	Year 1	Year 2	Year 3	Year 4	Year 5
Base	\$938.48 M	\$960.06 M	\$982.14 M	\$1,004.73 M	\$1,027.84 M
Best	\$1,086.60 M	\$1,111.59 M	\$1,137.16 M	\$1,163.31 M	\$1,190.07 M
Worst	\$755.30 M	\$772.68 M	\$790.45 M	\$808.63 M	\$827.23 M

Source: TMG Consulting

Note: Revenue impacts for Years 2 through 5 are grown with the Philadelphia Federal Reserve Bank for CPI projections for future values (2.3% increase per year).

Methodology

To project the potential impact Wynn Everett could have on the gross revenues of regional businesses, TMG Consulting utilized a number of economic data sources from the U.S. Census Bureau, the Bureau of Labor Statistics, and the Regional Input-Output Modeling System (RIMS II) for the Commonwealth of Massachusetts developed by the Bureau of Economic Analysis.¹

First, TMG Consulting projected the total indirect and induced output in the Commonwealth of Massachusetts based on the direct operating expenditures anticipated to be made at the Wynn Everett facility. The total economic output is the indirect and induced output in addition to the direct expenditures. When direct expenditures is a known or projected value it can be paired with the appropriate RIMS II final demand output multipliers to project indirect and induced output throughout the Commonwealth.

In the Base Case scenario, Wynn Everett is projected to make \$638.13 million in operational expenditures in the first full year of operations. For dollar consistency with RIMS multipliers, Wynn's operational expenditures were converted² to 2010 dollars, yielding \$545.90 million.

¹ Methodology for RIMS II detailed in [Attachment 3-01-01](#).

² All adjustments for inflation throughout this report use the Consumer Price Index (CPI) for the Massachusetts region published by the Bureau of Labor Statistics for past values and the Philadelphia Federal Reserve Bank for CPI projections for future values (2.3% increase per year).

The Type II final demand output multipliers, when paired with direct expenditures, calculate total additional output. Subtracting the direct output from this calculation isolates the indirect & induced output impact. In the Base Case, \$545.90 million of direct expenditures was paired with the RIMS Type II output multiplier for the amusement parks, arcades, and gambling industries (1.9263). This pairing yielded a total output impact (direct, indirect, and induced) of \$1.05 billion. Taking away the \$545.90 million of direct expenditures from this total, yielded a projection of \$505.67 million (in 2010 dollars) consisting of just the indirect & induced output in Massachusetts attributable to the Wynn facility. The table below details this projection for all operating scenarios.

Total Economic Output by Scenario, Year 1

Scenario	Operating Expense, 2017\$	Operating Expense, 2010\$	Final Demand Output Multiplier (TYPE II)	Total Direct, Indirect & Induced Output (2010\$)	Total Indirect & Induced Output (2010\$)	Total Direct, Indirect & Induced Output (2017\$)	Total Indirect & Induced Output (2017\$)
Base Case	\$638.13 M	\$545.90 M	1.9263	\$1,051.56 M	\$505.67 M	\$1,229.23 M	\$591.10 M
Best Case	\$738.85 M	\$632.06 M	1.9263	\$1,217.54 M	\$585.48 M	\$1,423.24 M	\$684.40 M
Worst Case	\$513.58 M	\$439.35 M	1.9263	\$846.32 M	\$406.97 M	\$989.31 M	\$475.73 M

Source: Regional Input-Output Modeling System (RIMS II) for Massachusetts, Bureau of Economic Analysis; Wynn Resorts; TMG Consulting Analysis

Next, TMG Consulting defined “regional” to mean the tri-county area most proximate to Wynn Everett—Middlesex County (where the facility would be located), Suffolk County, and Norfolk County. Based on data published by the Bureau of Economic Analysis, TMG calculated that 51% of all personal income in the Commonwealth was located in the tri-county area in 2012. For comparison and validation purposes, TMG also calculated the percentage of Massachusetts’ employment in the tri-county area (using Bureau of Labor Statistics data) in 2012, which was 46%.

As previously described, TMG Consulting projected the indirect and induced output in Massachusetts attributable to direct expenditures at Wynn Everett. To arrive at a projection for regional indirect and induced output, TMG used 51% (the percentage of all personal income in Massachusetts located in the tri-county area) as a proxy for the percentage of all Massachusetts business output in the tri-county area. For the Base Case, TMG projects Wynn Everett expenditures will spur \$300.35 million of indirect and induced output in the regional economy. Furthermore, because Wynn Everett is located in the region, and its operational expenditures can reasonably be expected to occur within the region, we apply 100% of those expenditures towards our projection for total regional output. For the Base Case scenario in the first full year of operations, we project total output in the region to increase by \$938.48 million—consisting of \$638.13 million of direct output and \$300.35 million of indirect and induced output. In other words, we project an increase in gross revenues in the region of \$938.48. The table below details this calculation for all three operating scenarios.

table below details this calculation for all three operating scenarios.

Projected Regional Output by Scenario, Year 1

Scenario	Estimated % to Regional Businesses Indirect & Induced Output	Total Indirect & Induced Output, 2017\$	Projected Regional (Indirect & Induced) Output, 2017\$	Projected Regional (Direct) Output, 2017\$	Total Regional Output, 2017\$
Base	51%	\$591.10 M	\$300.35 M	\$638.13 M	\$938.48 M
Best	51%	\$684.40 M	\$347.75 M	\$738.85 M	\$1086.60 M
Worst	51%	\$475.73 M	\$241.72 M	\$513.58 M	\$755.30 M

Source: TMG Consulting

In the tri-county area, there were 97,267 businesses in 2012 according to the Quarterly Census of Employment and Wages. The average projected regional output per business is \$9,648 in the Base Case scenario. The table below details this calculation for all operating scenarios.

Projected Output per Regional Business by Scenario, Year 1

Scenario	Projected Regional Output, 2017\$	Number of Regional Businesses	Average Output per Regional Business
Base	\$938.48 M	97,267	\$9,648
Best	\$1086.60 M	97,267	\$11,171
Worst	\$755.30 M	97,267	\$7,765

Source: Quarterly Census of Employment and Wages, Bureau of Labor Statistics; TMG Consulting Analysis

TMG projected the five-year gross revenue impact Wynn Everett is expected to have on regional businesses. We include Wynn Everett’s direct expenditures in this impact because it will be a regional business. The details of this projection can be found in the table below.

Projected Gross Revenue Increases at Regional Businesses by Scenario, Five Year Projection

Scenario	Year 1	Year 2	Year 3	Year 4	Year 5
Base	\$938.48 M	\$960.06 M	\$982.14 M	\$1,004.73 M	\$1,027.84 M
Best	\$1,086.60 M	\$1,111.59 M	\$1,137.16 M	\$1,163.31 M	\$1,190.07 M
Worst	\$755.30 M	\$772.68 M	\$790.45 M	\$808.63 M	\$827.23 M

Source: TMG Consulting

Note: Revenue impacts for Years 2 through 5 are grown with the Philadelphia Federal Reserve Bank for CPI projections for future values (2.3% increase per year).

DISCLAIMER

Consumer demand for gaming is particularly sensitive to downturns in the economy. Changes in consumer preferences or discretionary consumer spending brought about by factors such as fears of war, future acts of terrorism, general economic conditions, disposable consumer income, fears of recession and changes in consumer confidence in the economy could reduce customer demand for luxury products and leisure services, thus imposing practical limits on pricing and harming operations. Our projections would thereby be adversely affected.

All projections will be affected by international, national and local economic conditions. A recession or downturn in the general economy, or in a region constituting a significant source of customers, could result in fewer customers, which would adversely affect projections.

Casinos are generally dependent on the willingness of customers to travel. As a result of the terrorist acts of September 11, 2001, domestic and international travel was severely disrupted, which resulted in a decrease in customer visits to casinos. Developments in international conflicts could have a similar effect on domestic and international travel. No one can predict the extent to which disruptions in air or other forms of travel as a result of any future terrorist act, outbreak of hostilities or escalation of war would adversely affect projections.

As a result of the SARS outbreak in Asia, there was a decrease in travel and economic activity in affected regions. In addition, there have been recent fears concerning the spread of avian and swine influenza. Potential future outbreaks of SARS, avian flu or other highly infectious diseases may adversely affect the number of visitors. Any new outbreak of such a highly infectious disease could have a material adverse effect on the projections.

Changes in transportation infrastructure could hinder access for visitors and negatively impact specified sites' desirability and operations.

This report reflects analysis and opinion based on primary and secondary sources of information. We have utilized sources that are deemed to be reliable but cannot guarantee their accuracy. Moreover, estimates and analysis regarding the project are based on trends and assumptions and, therefore, there will usually be differences between the estimated and actual results because events and circumstances frequently do not occur as expected, and those differences may be material. We have no obligation, unless subsequently engaged, to update this report or revise this analysis as presented due to events or conditions occurring after the date of this study.

TMG Consulting makes no express or implied representation or warranty or guarantee as to the attainability of any projected or estimated information referenced or set forth herein, or as to the accuracy or completeness of the assumptions from which such projected or estimated information is derived. Any such projections or estimations are necessarily subject to a high degree of uncertainty and may vary materially and adversely from actual results.

Some of the statements in this report constitute forward-looking statements. These statements involve risks, uncertainties and other factors that may cause you or your industry's actual results, levels of activity, performance or achievements to be materially different from any future results, levels of activity, performance or achievements expressed or implied by these forward-

looking statements. In some cases, you can identify forward-looking statements by terminology such as “may,” “will,” “should,” “would,” “could,” “believe,” “expect,” “anticipate,” “estimate,” “intend,” “plan,” “continue,” “projection,” “forecast,” or the negative of these terms or other comparable terminology.

Although we believe that the expectations reflected in the forward-looking statements are reasonable, we cannot guarantee future results, levels of activity, performance or achievements. If one or more of the assumptions underlying our forward-looking statements proves incorrect, then actual results, levels of activity, performance or achievements could differ significantly from those expressed in or implied by the forward-looking statements contained herein. These forward-looking statements are subject to risks, uncertainties, and assumptions about or the projections that are subject to change based on various important factors, some of which are beyond our control. The factors identified above, among others, could cause our projections to differ significantly from the goals, plans, objectives, intentions and expectations expressed in our forward-looking statements. Therefore, we caution you not to place undue reliance on our forward-looking statements. All forward-looking statements attributable to us are expressly qualified by these cautionary statements.

The accompanying study is prepared for the information and use of our client, and may not be relied upon by any third party for any purpose, including but not limited to financing of the project or investing in the project.

While TMG Consulting endeavors to provide reliable estimates and projections, TMG accepts no liability by any party acting in relation to estimates and projections provided herein.

F. APPLICATION

2-35 New Revenue

. This percentage contribution from the entertainment sector is substantially below other populous states with major metropolitan areas. While this lower relative percentage contribution certainly reflects Massachusetts', especially Boston's, position as a strong business and education center, it also highlights the potential for a major entertainment-related venue to enter the market and be complementary to existing businesses. The Wynn Resort in Everett with its unique leisure- and entertainment-driven business model, supported by a combination of unique integrated-casino-resort amenities, five-star customer service, and partnerships with local businesses, largely will be complementary to existing businesses.

3-4 Job Opportunities and Training for Unemployed or Underemployed

Wynn commissioned RKG Associates (“RKG”) to prepare a report on the impact of the Wynn Resort in Everett on the City of Everett and its surrounding communities. Pursuant to the terms of its host and surrounding agreements, the vast majority of these positions would be filled by residents of the host and surrounding communities – communities suffering from higher unemployment rates than other regions in the Commonwealth. Currently, the City of Everett has an unemployment rate of 10.4% which is one of the highest unemployment rates in the Commonwealth. Wynn is committed to hiring residents from its host and surrounding communities and providing necessary training prior to and following the opening of the Wynn Resort in Everett. Through the development of thousands of new jobs, training and recruiting, Wynn is confident that it will have a significant positive impact on high unemployment and underemployment in the region.

3-5 Experience with Hiring Unemployed and Underemployed

Wynn Resorts has always strived to create a diverse workforce and hire from areas characterized by high unemployment or underemployment. At its properties in Las Vegas, Wynn Resorts has utilized recruitment and training efforts to ensure that it provides job opportunities and extensive career training and development to those who are unemployed or underemployed. These efforts include (i) the utilization of recruitment partners who specialize in diversity, (ii) specific recruitment outreach programs to reach unemployed or underemployed groups, (iii) leadership and skills training, (iv) tuition reimbursement and seminar assistance, (v) internal career counseling, (vi) citizenship classes, and (vii) ESL classes.

4-14 Serving the Surrounding Community

As an integrated destination resort casino unique to the region and the surrounding communities, the Wynn Resort in Everett will not compete with local businesses; instead, it will stimulate incremental visitation and spend from local, regional, national, and international customers to the greater Boston area, which will benefit local businesses.

The Wynn Resort in Everett plans on entering into partnerships with local businesses and destinations, including a potential “Best of Boston” restaurant concept, in order to attract visitors who plan on making the Wynn Resort in Everett only part of their stay. In addition, Wynn is actively seeking local and regional partnerships in Everett, its neighboring communities and the region to create an Everett version of its “WE Save” program, a program designed to offer Wynn employees discounts on a wide variety of products and services and stimulate employee spend in the local community. For example, pursuant to its Host Community Agreement with the City of Everett and its Surrounding Community Agreement with the City of Malden, Wynn has agreed to purchase gift vouchers from local businesses within such communities. Wynn intends to use a portion of these vouchers to drive employee spending in such communities.

G. OTHER
