

MASSACHUSETTS GAMING COMMISSION SURROUNDING COMMUNITY PETITION ANALYSIS



COMMUNITY: City of Saugus
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 \$6.5community, 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

Saugus states that it sits in close proximity to Everett. The distance from the closest point on Route 1 in Saugus to the proposed casino site is about 4.5 miles by car, or 4 air-miles. Saugus' closest border is approximately 1.9 miles from the host community, Everett, measured from border-to-border on Route 99

From transcript (Jan. 29, 2014)

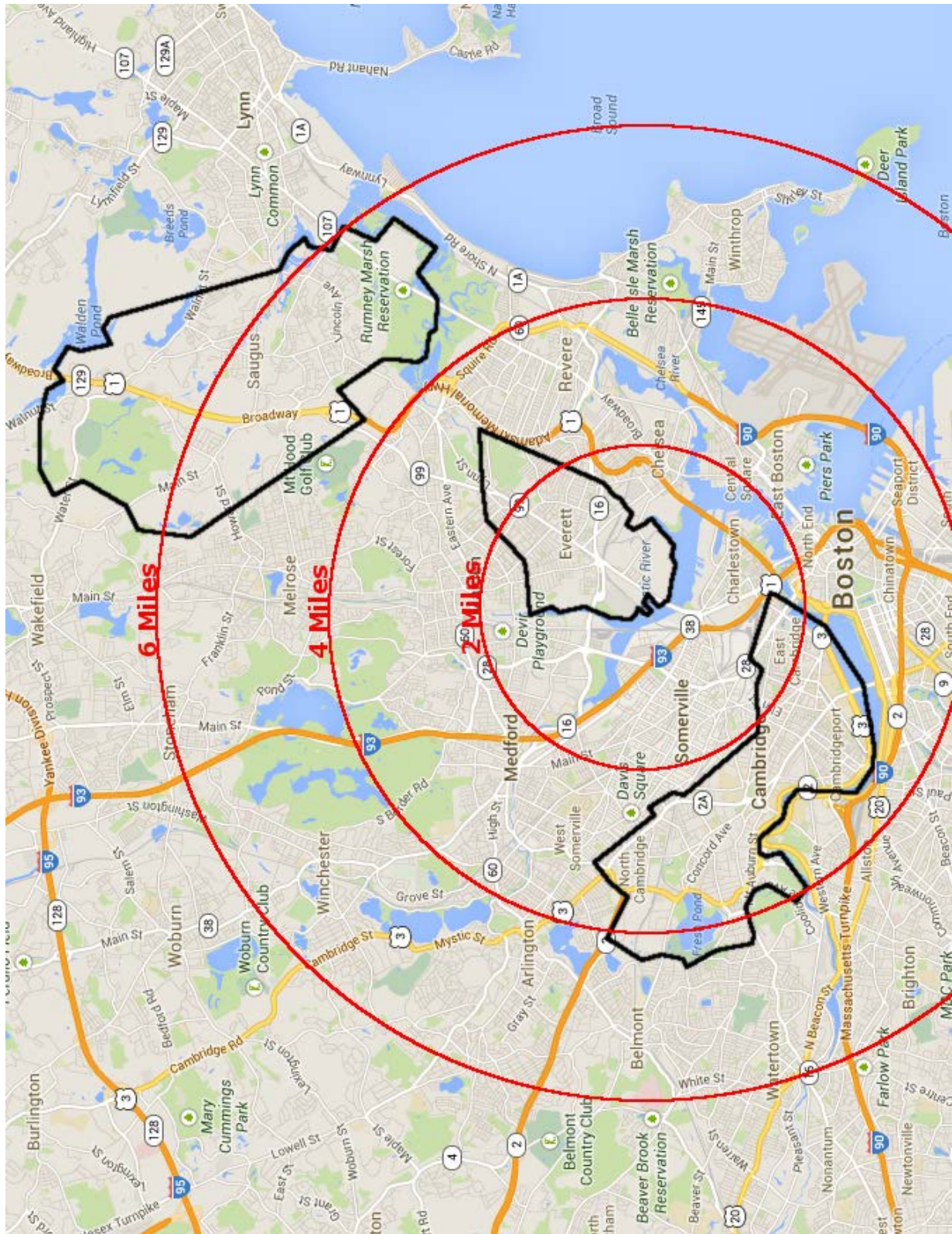
Pg. 105, Mr. Ausrotas

18 By our calculation, with regard to
19 the host community border, that's less than two
20 miles along Route 99, 1.9 miles to be precise,
21 less than five miles from the proposed casino.
22 By our calculations, it's 4.2 miles to the
23 Saugus border from the Wynn proposed site and
24 4.5 miles from Route 99/Route 1 interchange.

Applicant Response

Wynn states that Saugus and Everett do not have any common border, and that it is 4.5 miles from the proposed casino site to the border of Saugus.

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



A. COMMUNITY PETITION

Specifically, although not immediately bordering, the Town sits in close proximity to Everett. We estimate that it is 4.5 miles in driving distance from the closest point on Route 1 in Saugus to the proposed casino site, and approximately 4 miles in air-mile distance from the proposed casino site.

JANUARY 29, 2014 STATEMENT IN SUPPORT OF SURROUNDING COMMUNITY DESIGNATION FOR SAUGUS MASSACHUSETTS IN CONNECTION WITH WYNN RESORTS APPLICATION

, and is 4 miles by air from the casino location in Everett proposed by Wynn Resorts in its application; Saugus is 4.2 miles from the proposed casino by car heading North on Route 99 (on which route the resort would be located). Saugus has every reason to believe that Route 1 will be a primary travel road, both to and from, the proposed Wynn casino, for most traffic in the North/Northeast on the Route 95 and Route 128 corridor. In fact, the interchange of Route 99 and Route 1 is located in Saugus, 4.5 miles from the Wynn site.

From transcript, 1/29/2014

p. 105, Mr. Ausrotas
 10 We did provide written testimony,
 11 which was handed to Commission staff this
 12 morning as well as to Wynn Resort's counsel.
 13 If I could direct everyone's attention to page
 14 three of that written statement, you'll see in
 15 there which reflects proximity both as regards
 16 to the casino as well as the border of Everett
 17 itself.
 18 By our calculation, with regard to
 19 the host community border, that's less than two
 20 miles along Route 99, 1.9 miles to be precise,
 21 less than five miles from the proposed casino.
 22 By our calculations, it's 4.2 miles to the
 23 Saugus border from the Wynn proposed site and
 24 4.5 miles from Route 99/Route 1 interchange.

p. 106

If I could actually request one of
 5 the slides which we hadn't seen before be put
 6 back up showing proximity of nonadjacent
 7 communities. I don't know if that is still
 8 available?
 9 CHAIRMAN CROSBY: The Wynn slide?
 10 MR. AUSROTAS: Yes.
 11 MR. GORDON: Do you want the matrix?
 12 MR. AUSROTAS: The distance, that
 13 showed respective distance. Thank you. It's
 14 notable to us at least in seeing this today,
 15 it's our understanding that Lynn and Melrose
 16 have reached agreement as to surrounding
 17 community designation that neither are
 18 adjacent.

B. APPLICANT RESPONSE

From 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 4.5 miles from the site to the border of Saugus.

20 ...We did not designate either Lynn or
21 Melrose as surrounding communities. We
entered
22 into neighboring community agreements with
23 them. As I noted when we were talking with
24 Cambridge, is that we have not abandoned
anyone
Pg. 107

1 who has reasonable discussion with our company.
2 So, it's important to be clear
3 though we have continued to adhere very closely
4 to the regulations. Our conclusion, which
5 Chris will review in greater detail with
6 respect to Saugus is that it does not fulfill
7 the regulatory requirements of a surrounding
8 community.

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

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

[T]he Saugus transportation infrastructure would be significantly burdened by traffic to and from the proposed casino/resort on Route 1, as well as by a significant percentage of such traffic seeking alternate routes on Town roads in order to continue on to arterials leading to the City of Everett and the proposed casino site.

Route 1 already carries 100,500 vehicles per day on weekdays, and any driver in the area is familiar with its bumper-to-bumper rush hour gridlock. In 2011, there were 245 accidents on Route 1 in Saugus, sadly including one fatality, and 92 injuries. One of the on-ramps, at Walnut Street, is recognized as a "top" dangerous location by traffic officials. We have every reason to believe that the interchange at Route 99 and Route 1 will be a frequently used access point for individuals traveling North to or from the proposed casino site (which essentially sits at the southern point of Route 99 in Everett). This interchange has been recognized as inadequate and desperately in need of attention at present, and with a significantly increased volume of traffic that would surely accompany a casino in Everett, the effect could be calamitous.

Saugus has retained CDM to perform an initial analysis of the likely potential traffic impacts to Saugus of Wynn's proposed casino resort based upon a review of the Wynn application.

CDM found that a Wynn casino in Everett would create a "perceivable difference in the flow of traffic on the town's roadway networks," and that "[a]dded volume during already congested periods will cause traffic to divert to town streets to avoid jams which will stress already stressed intersections, and potentially hamper emergency response time." See Exhibit A (Memorandum of CDM Smith, dated January 28, 2014).

Transcript – January 29, 2014:

Route 1 is not a typical limited access highway. There are a lot of abutters who direct access onto Route 1. It carries close to 100,000 vehicles a day. And as the project has stated, it will be adding about 11 percent north of the Route 99 merge....11 percent of their project trip traffic will be traveling via Route 1 north of Router 99. ...

The 11 percent would be about 1800 [vehicles].

Route 1 already operates at bad levels, level of service E, level of service F based on various studies and 19 various projects. And the addition of those vehicles will cause vehicles to divert, whether they be local traffic that would have normally gotten on Route 1 on the north side of the town to travel south or vice versa or local regional traffic.

[T]here are four locations where they can traverse from one side to the other. ... As those interchanges become more congested, obviously, that could have an impact on emergency response times as well as the local traffic....

[T]he 11 percent that would be on Route 1 would be in an order of magnitude of 200 trips....During the peak hours, our studies have shown that they do operate at level of service F. The intersections and interchanges get heavily congested.... In particular, the Walnut Street interchange that's scheduled to be reconstructed beginning in 2016, recognizing the fact that it does have a high incidents of accidents. There were 72 accidents there in 2011.

All four of the interchanges show up on the Mass. DOT 2011 crash clusters map because of congestion. You have a lot of rear-end accidents when you have traffic entering and exiting the traffic stream at on-ramps and off-ramps

Applicant Response

Table indicates zero direct trips in and zero direct trips out of Saugus. Table indicates 8 percent indirect trips into Saugus and 7 percent indirect trips out of Saugus.

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

Transcript, 1/29/2014

Page 110 Mr. Murphy

16 ... Route 1 already
17 operates at bad levels, level of service E,
18 level of service F based on various studies
and
19 various projects.
20 And the addition of those vehicles
21 will cause vehicles to divert, whether they be
22 local traffic that would have normally gotten
23 on Route 1 on the north side of the town to
24 travel south or vice versa or local regional

Pg. 111

1 traffic.

Pg. 133, Mr. Gordon

22 ...But our
23 traffic on Route 1 would be roughly one
percent
24 increase in our peak hour to Route 1.

Pg. 134

1 If you look at 107,000 cars that's

2 on that a day, our traffic is about 1500 cars a
3 day. In the peak hour, it's 144, and only half
4 of that is going in either direction.

5 So, we're down to about 65 or 70
6 cars in the peak hour, which is a Friday night
7 on Route 1. And most of it is going in the
8 opposite direction from the peak commute on
9 Route 1 and we're later than the peak
commute.

...

12 It's around one percent. As an example, in the
13 letter that was sent out by CDM Smith, they
14 referenced the recent Super Walmart that was
15 approved on Route 1 and is being built. That
16 produces about 8300 cars. So, we've got
about

17 one-sixth of that amount of traffic. And that
18 was viewed as having an almost insignificant
19 impact. And that required a fix to only one
20 signal. ...

21 ...

22 ...with being one-sixth of that

23 traffic, we felt it fell well below the
 14 MR. CRABTREE: Across from the
 15 Hilltop. And I think it just should be noted
 16 as far as the Walmart, when the Walmart was
 put
 17 in, there was a traffic study, but it was six
 18 years old. And out of the wisdom of the local
 19 planning board, they did not have a traffic

24 thresholds that we're triggering for all of the
 20 impact study done for a Super Walmart. I
 guess
 21 my question would be to the Wynn
 organization
 22 is that in these studies here, did it take into
 23 account the Super Walmart being in that
 24 location?

RPA Analysis

MAPC did not specifically mention Saugus or Route 1 in Saugus. MAPC did express concerns about the potential of the proposed facility to hamper planned development mentioning Everett, Somerville, Medford and Charlestown.

DEIR Analysis

DEIR Certificate – The DEIR Certificate did not specifically reference the Town of Saugus or Route 1 in Saugus.]

“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:”
[NO intersections in Saugus identified in the DEIR Certificate]...

MassDOT-DEIR Comment Letter

The MassDOT DEIR Comment Letter did not specifically reference the Town of Saugus or Route 1 in Saugus.

DCR DEIR comments

DCR did not mention any Saugus roadways in analysis.

Consultant Analysis

Green

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 did not include any intersections/interchanges in the Town of Saugus. The most direct route between the Town of Saugus and the proposed Wynn Everett Casino site is Route 99. However, due to traffic congestion and numerous traffic signals along the Route 99 corridor between Saugus and the Wynn Everett Casino site, Route 99 is not expected to be the “primary” route that connects the Town of Saugus to the proposed site. Rather, the primary roadway between the Town of Saugus and the proposed site is expected to be Route 1, with driver’s using Route 16 in Chelsea and Everett to access Route 99 and the Wynn Everett Casino site. The town’s center is located approximately 7 miles from the casino site traveling along Route 1 (the primary route), or 5.4 miles traveling along Route 99 (the most direct route).

The MassDOT comments were focused on Route 99, Route 16, and the I-93 ramps, as well as the Applicant’s forecasting methods. MassDOT did not raise any concern relative to Route 1 in the Town of Saugus nor did they ask MEPA to have the Applicant include the Route 1 Saugus section in any subsequent environmental studies. The Town of Saugus did not submit any comments to MEPA as part of the ENF review.

The proposed casino project is estimated to generate a total of 20,234 vehicle-trips over the course of a Friday, and a total of 24,110 vehicle-trips over the course of a Saturday. Peak hour vehicle trip estimates include 1,681 vehicles trips for the Friday peak hour and 1,977 vehicles trips for Saturday peak hour.

...

It is estimated that approximately 11% of the project traffic will travel to/from the northeast direction, through the Town of Saugus. The method used to develop the expected trip distribution patterns in the DEIR is based on a market study (conducted by TMG Consulting), population centers, the regional and local roadway system, existing traffic patterns, and the most direct route between the project site and major transportation terminals (such as Logan Airport, North Station, and South Station).

Route 1 is the major roadway serving the Town of Saugus and would be used, from the north, by casino patrons traveling to the proposed Wynn Casino in Everett. Most of Route 1 in Saugus is a six-lane arterial roadway (three lanes in each direction). The southern section of the Route 1 (from Route 99 to the Saugus / Malden town line) is a four-lane arterial roadway. In the Town of Saugus, there are five grade-separated interchanges that

provide access to/from local roadways. However, direct access is also provided to commercial properties abutting Route 1, typically with “right-in, right-out” vehicular movements only. Route 1 is a primary commuter route that connects I-95 and Route 128 to the north with the City of Boston to the south. Based on existing MassDOT traffic data, Route 1 carries approximately 110,500 vehicles during an average weekday. An estimate of peak hour traffic was made assuming approximately 9% of the average weekday volume. This results in an estimated base peak hour flow of 9,945 vehicles on Route 1. The existing roadway is near or at capacity during peak periods. Vehicular capacity is reduced as a result of the numerous commercial driveways with direct access to/from Route 1.

...While Route 99 provides a direct connection to the proposed casino driveways in Everett, there are numerous traffic signals along the corridor. In general, traffic is heavily congested between Saugus and the proposed site of the Wynn Everett Casino, including the Route 99 segment through Malden and Everett.

The trip distribution used in the project’s DEIR indicates that 9% of casino related traffic is expected to use Route 1, while only 2% is expected to use Route 99. However, as the Route 1 / Route 99 interchange is located in the south of Saugus, it is reasonable to assume that all 11% the traffic volumes will be traveling Route 1 through the Town of Saugus. This is equivalent to an additional 2,225 vehicles during a typical Friday and an additional 2,652 vehicles during typical Saturday. An additional 185 casino-related vehicle-trips are anticipated during the Friday peak hour, and an additional 217 casino-related vehicle-trips are anticipated during the Saturday peak hour.

...The crash rate for Route 1 was determined to be 1.20 crashes per million vehicle miles traveled (MVMT). This is below the statewide average of 3.23 crashes per MVMT for similar roadways (Urban Principal Arterials). Based on the existing segment crash rate for Route 1 in the Town of Saugus, and the expected additional traffic volumes that would travel Route 1, approximately four (4) additional crashes per year could be expected within the Town of Saugus.

While Saugus and its major roadways and intersections were not included in the detailed traffic impact analysis, it is evident that 11% of the site trips would originate from or travel through the Town of Saugus. Assuming that all of this traffic uses Route 1, this will result in an increase of approximately 2 – 2.5% of traffic volumes on Route 1. As Route 1 is at or near capacity during the peak periods, under existing conditions, the additional peak hour vehicle-trips added to Route 1 could result in increased congestion, vehicle delays, and queuing. This could be experienced on Route 1 itself and at the five interchanges along Route 1 in the Town of Saugus.

...an additional 2,225 vehicles are expected to use Route 1 over the course of a typical Friday, with 185 additional vehicles during the peak hour. This level of additional vehicle trips could be expected to result in a noticeable change in traffic operations, with a degradation of LOS along the Route 1 corridor and at the five interchanges along Route 1 in the Town of Saugus.

While some traffic increases may occur due to these two scenarios, it is expected that traffic volume increases on other local roadways will be minor and dispersed over several local roadways.

Transportation Infrastructure – The Applicant has stated that construction related heavy vehicle traffic could be managed. While most of the documentation to date has focused on the maintenance of traffic in the immediate construction zone, it would be anticipated that the majority of construction materials and the larger construction related traffic would utilize the major highways to access the site, I-93 in particular. At this time it is not specifically known where materials would be obtained from, however, it is anticipated that most longer haul trips would utilize the major interstate highways. In addition, construction related traffic and the facility that materials are procured from can be controlled to a large degree by the Applicant. Thus, the heavy vehicle traffic impact and consequently, local road infrastructure impact on major roadways within the Town of Saugus should be minimal.

Peak Vehicle Trips generated on State and Federal Highways – As stated above, there are significant peak hour vehicle-trips anticipated on state highways. As a direct result of the Wynn Everett Casino, an additional 185 vehicle trips are expected during the Friday peak hour, and 217 vehicle trips are expected during the Saturday peak hour on Route 1. This level of additional peak hour traffic could strain an already congested roadway, and could result in a noticeable change in vehicle operations.

Based on the evidence summarized above, it is likely that a noticeable degradation of traffic operations will occur along the Route 1 corridor within the Town of Saugus as a direct result of the proposed Wynn casino in Everett. The possibility also exists that local roadways will be impacted if drivers choose to divert to local roadways to reach their destinations as a result of the additional traffic traveling on Route 1. Consequently, it is recommended that the Town of Saugus be designated as a surrounding community on the basis of significant peak hour vehicle-trip generation, the potential for changes in traffic operating conditions (Level of Service), and because of the geographic proximity to the site and host community.

Dewberry Analysis

Near the Saugus southern boundary, the DEIR indicates that 2% of the Project trips are expected to travel on Route 99 and 9% on Route 1. We agree with Green's assessment that, once in Saugus, the Route 99 traffic will merge with the Route 1 traffic such that all 11 % of the traffic will use Route 1 through Saugus.

As cited in the Green report, MassDOT has generally accepted the methodologies used by the Project to analyze its traffic impacts on the study area road network and transit facilities. MassDOT's review of the ENF document did not mention any concern they may have on the segments of Route 99 and Route 1 in the vicinity of Saugus.

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 in the Saugus vicinity. 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 Saugus as a Surrounding Community.

We agree with the Green description of traffic conditions on Route 1 in Saugus. Per the 2010 volume data available from MassDOT, Route 1 is serving 110,500 VPD (2-way) and approximately 9,945 VPH (2-way) during the peak hour. These volume characteristics indicate that Route 1 is operating at or over its vehicle-carrying capacity during commute periods for the peak direction of flow, based on standard traffic engineering measurements. The peak direction is southbound in the morning peak hours and northbound in the evening. Exacerbating the Route 1 condition is the presence of numerous driveways that exist for access to retail establishments. Entering and exiting traffic using these driveways causes sufficient friction to Route 1 traffic flow, which further reduces its effective vehicle-carrying capacity. While there are 3 travel lanes for each direction on the segment of Route 1 within Saugus, the outside lane essentially operates as a service lane for the retail establishments and not as much as a through lane. Also and unique to the southbound direction only is that, where there are 3 lanes on Route 1 in Saugus, there are only 2 lanes south of the Route 99 interchange. This lane reduction causes slowdowns on Route 1 southbound during the morning commute.

Projected Changes in Level of Service (LOS)-While the Applicant's MEPA studies did not include any specific analysis of LOS at intersections or roadways in Saugus itself, we agree with Green that levels of service on Route 1 in Saugus will worsen as a result of Project-generated trips adding to its already congested condition.

Increased Traffic Volumes on Local Streets-We agree that approximately 188 Project-generated trips will add to the typical Friday traffic volume on Route 1. Local roads would also experience some increase in traffic volumes due to some Project-generated trips or to vehicles that choose to avoid the higher delays on Route 1. These impacts on local roads will be relatively minor however since these trips will likely be distributed--over the 4 Saugus interchanges and their respective local arterials--as they make their way to or from Route 1.

Transportation Infrastructure-We agree that heavy vehicles involved in Project construction would likely use the major highways to access the Project site, depending on the source of the materials used. The only exception would be if the construction material source or destination is located in Saugus itself. In this case, Route 1 and the related local street will experience some impact from heavy truck loads.

Peak Vehicle Trips Generated on State and Federal Highways – We agree that Project-generated trips will travel on Route 1 and affects its traffic condition, as mentioned above.

Adverse Impact on Transit Ridership and Station Parking – We agree that no impact to transit concerns is expected as a result of the Project, considering the limited transit services along the Route 1 corridor in the Saugus area and the minimal number of Project-generated transit trips that would travel to and from this area.

A. COMMUNITY PETITION

[T]he Saugus transportation infrastructure would be significantly burdened by traffic to and from the proposed casino/resort on Route 1, as well as by a significant percentage of such traffic seeking alternate routes on Town roads in order to continue on to arterials leading to the City of Everett and the proposed casino site.

We have every reason to believe that the interchange at Route 99 and Route 1 will be a frequently used access point for individuals traveling North to or from the proposed casino site (which essentially sits at the southern point of Route 99 in Everett). This interchange has been recognized as inadequate and desperately in need of attention at present, and with a significantly increased volume of traffic that would surely accompany a casino in Everett, the effect could be calamitous. See Exhibit A (12/10/13 Transportation Improvement Plan concerning Route 99/Route 1 interchange). To the extent that any heavy construction equipment or hauling of debris/materials will be traveling North to or from the casino site, we similarly presume that this too would be on Route 1.

JANUARY 29, 2014 STATEMENT IN SUPPORT OF SURROUNDING COMMUNITY DESIGNATION FOR SAUGUS MASSACHUSETTS IN CONNECTION WITH WYNN RESORTS APPLICATION

In addition to many of Saugus' own residents, anecdotal evidence suggests that those from several nearby communities (such as Salem, Lynn, Peabody and Beverly) would likely avoid major interchanges altogether and travel instead through Saugus' arterial roads to get to Everett for the purpose of local travel to and from this casino. More specifically,

From transcript, 1/29/2014

Pg. 107

19 In any event, a couple notable
20 points moving on from proximity with regard to
21 transportation as we'll hear from CDM and Mr.
22 Murphy and the attached report, which you've
23 been provided with our written testimony today,
24 using Wynn's numbers, again, Saugus has not
had

Pg. 108

1 the opportunity to perform its own methodology,
2 for example, ...

19 As to fire, Everett and Saugus are
20 both parties to a mutual aid agreement
21 comparable to the police and we'll be able to
22 hear the impact on response time when there is
23 increased congestion.

Pg. 110

MR. MURPHY

5. . . The point being that Route 1,

6 it's not a typical limited access highway.

7 There are a lot of abutters who direct access
8 onto Route 1

12 CHAIRMAN CROSBY: Eleven percent of
13 the 100,000?

14 MR. MURPHY: No, 11 percent of their
15 project trip traffic will be traveling via
16 Route 1 north of Router 99.

2 The long regional project trips will
3 likely stay on Route 1 because they're not
4 familiar with the side roads and other routes
5 that can be taken to the project site.

6 The other concern for the town is
7 the interchanges. Again, those interchanges
8 are the only opportunity to pass from one side
9 of town to the other. So, there are four
10 locations where they can traverse from one side
11 to the other.

12 As those interchanges become more

13 congested, obviously, that could have an impact
14 on emergency response times as well as the
15 local traffic. That's about it.

16 There is concern for the town that
17 the trips that are to be added to Route 1 will
18 create diversion which will create problems for
19 not only certain interchanges but adjacent
20 intersections on alternate routes.

21 CHAIRMAN CROSBY: How many trips is
22 the 11 percent?

23 MR. MURPHY: The 11 percent would be
24 about 1800.

Pg. 112

1 CHAIRMAN CROSBY: 1800 trips that's
2 per hour at max?

3 MR. MURPHY: That's in the peak
4 hour.

Page 112

11 MR. DIMELLA: Good morning. As far
12 as public safety impacts, specifically on the
13 Police Department, we feel that any increase in
14 traffic on Route 1 will have an effect on the
15 town and on public safety as far as our
16 response times go.

Page 113

1 So, I believe it will definitely
2 have an impact, a detrimental impact on traffic
3 and put a strain on our resources as a police
4 department.

Pg. 114 (Saugus Response)

18 MR. CRABTREE: Mr. Chairman and
19 members of the Commission, good morning. I
20 just wanted to note and add and maybe the Chief
21 could speak on it so that you get an
22 understanding of Route 1.

Pg. 115

7 MR. DIMELLA: Yes. Historically, we
8 have patrolled Route 1. We share with the
9 State Police. But in Saugus we predominately
10 book most of the accident there.

11 So, Route 1 calls for service is a
12 big drain on a small department like mine. And
13 any additional traffic would have a negative
14 impact.

15 CHAIRMAN CROSBY: Okay.

16 MR. AUSROTAS: Chief McQuaid, if you
17 could speak as to the fire department.

18 MR. MCQUAID: Good morning. Looking
19 at this situation from my perspective as the

20 Fire Chief, as the Wynn representative said,
21 it's all about the increase in traffic the
22 casino will cause. Saugus doesn't have a large
23 fire department. We have a ladder and two
24 pumps in service.

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1 If there's more traffic on the
2 highway, there's going to be more accidents.
3 It's short and sweet. It's definitely going to affect
4 us.

9 It's basically coming from the North
10 Shore, you've got to use Route 1. That's going
11 to be the main thoroughfare. Again, more
12 people on the highway, more accidents. We have
13 6:30 in the morning until 9:30 the morning with
14 real bad on Route 1 and then again in the
15 afternoon.

16 As the Wynn representative said,
17 maybe the times will be different because it
18 won't be until 9:00 in the evening when their
19 traffic hits. But when they're leaving the
20 casinos, potentially one or two of them might
21 have had a drink. So again, they're going to
22 be coming back down Route 1 going home,
23 accidents again.

24 If we have backups on the highway,

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1 our response times are going to be more
2 difficult. It's going to take us longer to get
3 there. The quicker we get there, the better it
4 is for the patients that are injured on the
5 scene.

6 We also have a reciprocal agreement,
7 Saugus and Everett and all of the surrounding
8 communities are in the Metro fire district.

9 Again, I'm going to get back to the traffic.
10 It's 35 communities all in the Metro fire
11 district. And if we can't get from one place
12 to another, if Everett has a fire, if Saugus
13 has a fire, like I said, the mutual aid, they
14 come to us, we go to them. It's just going to
15 be more difficult to get anywhere you need to
16 go. The response times are going to be longer.

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Pg. 128

21 COMMISSIONER ZUNIGA: Is this the
22 intersections you were mentioning earlier in
23 Saugus?

24 MR. MURPHY: I'm sorry?

Pg. 129

1 COMMISSIONER ZUNIGA: Are these the
 2 intersections that you mentioned in Saugus or
 3 throughout?
 . There were 72
 9 accidents there in 2011.
 10 All four of the interchanges show up
 11 on the Mass. DOT 2011 crash clusters map
 12 because of congestion. You have a lot of rear-
 13 end accidents when you have traffic entering
 14 and exiting the traffic stream at on-ramps and
 15 off-ramps. So, yes, those are the
 16 intersections that I'm speaking of.
 17 COMMISSIONER ZUNIGA: And the peak
 18 hours are rush hour in the morning and the
 19 afternoon, I take it?

20 MR. MURPHY: Yes.

Pg. 138

14 MR. CRABTREE: Across from the
 15 Hilltop. And I think it just should be noted
 16 as far as the Walmart, when the Walmart was
 17 put
 18 in, there was a traffic study, but it was six
 19 years old. And out of the wisdom of the local
 20 planning board, they did not have a traffic
 21 impact study done for a Super Walmart. I guess
 22 my question would be to the Wynn organization
 23 is that in these studies here, did it take into
 24 account the Super Walmart being in that
 location?

**Memorandum**

*To: Scott Crabtree
 Town Manager, Saugus*

*From: Paul E. Ross, P.E.
 Daniel Murphy, Jr.*

P.E. Date: January 28, 2014

Subject: Town of Saugus Transportation Impacts of Wynn Everett

As requested, CDM Smith has compiled this summary of potential transportation concerns and impacts to the town of Saugus and its roadways based on available information and the DEIR filed by Wynn Everett.

With the limited time available and understanding that others have already done so, we did not delve deeply into the methodology of the proponent's trip generation and distribution projections.

Saugus Transportation Network

Route 1 is an Urban Interstate that bisects the town, carrying regional traffic from the north and south as well as from Wakefield via Route 129. With four major intersections/interchanges in town, (at Essex Street, Main Street, Lynn Fells and Walnut Street/129) it also carries local traffic from one end of town to another. Route 107 also provides a regional corridor from the north into Saugus and points south, though connectivity in Saugus is limited.

In order for Saugus residents to travel from one side of the town to the other, they must do so by way of overpasses at one of these few interchanges over Route 1. When Route 1 is congested

and the associated ramps slow down, the impact is carried over onto the surface streets and these overpasses.

Route 1 Existing Conditions

Route 1 between Route 60 and Route 99 is a bottleneck, providing two lanes in each direction with three lanes in each direction to the north and south. As a result, the interchanges at Copeland Circle and at Route 99 are heavily congested. Further, this congestion carries north and south, particularly in the morning and evening peaks, respectively.

This congestion not only hampers local traffic wishing to enter Route 1, but also those who must use the overpasses to travel east-west or west-east over the arterial highway that divides the town.

The on and off ramps bring a level of traffic congestion, not only by regular users of Route 1, but by those that tend to "jump off" of Route 1 during congested periods to cut through the town toward their alternate route.

Crash Clusters

Each of the interchanges on Route 1 within the boundaries of the town of Saugus are represented on the MassDOT 2011 Crash Clusters map, each having a number of recorded crashes in 2011 higher than many of the project study intersections had in the three years studied. The crash numbers for the interchange of Route 1 with:

- Main Street experienced 44 crashes, 14 of them resulting in injuries
- Essex Street experienced 55 crashes resulting in 23 injuries
- Lynn Fells experienced 32 crashes resulting in 9 injuries (2010 data)
- Walnut Street experienced 72 crashes with one fatality. 28 of these crashes resulted in injuries.

Further, the Route 1/Walnut Street interchange is ninth on a list of the top 25 crash locations between 2006 and 2008, prepared by the Boston Region MPO. Route 1 at Essex Street is number 24 on that list.

(Note: The Walnut Street interchange has been identified for partial funding in the MassDOT 2014-2018 Capital Improvement Program and may begin construction as soon as 2016.)

Projected Route 1 Vehicle Trips

According to Figure 4-51 in the DEIR, nine percent of trips will use Route 1. Two percent will use Route 99 to and from the north. Ultimately, these two roadways merge in Saugus. This means that at least eleven percent of the project-generated trips will travel to and from the gaming resort through Saugus.

Additionally, even those regional trips using Route 60 or Route 107 will travel through Saugus as will any of the 25,000 Saugus residents that wish to visit the facility.

Many of the project study area roadways carry less project traffic than Route 1, however, none of the Route 1 interchanges in Saugus were considered in the study.

The Wynn Everett study prepared by Vanasse and Associates with Howard/Stein-Hudson used a project-wide annual growth factor of 0.5%. Further the communities of Everett, Boston, Cambridge,

Scott Crabtree
January 28,2014
Page 3

Chelsea, Medford, Revere and Somerville were contacted to inquire about additional development projects to be considered in calculating the background growth for the traffic analysis.

Route 1 in Saugus, which is projected to carry 11% of the project-generated traffic north of Route 99, will experience additional development. A Super Wal-Mart is expected to open at 770 Broadway (Route 1) in the Summer of 2014.

With a projected 1,681 and 1,977 projected vehicle trips in the Friday and Saturday peak hours, 11% on Route 1 will be 185 and 217 additional cars. At 22' per vehicle, that's 4,000 to 4,800 feet of additional queuing.

Potential Impacts

The additional traffic that the gaming resort will admittedly bring to Route 1 and Saugus roadways will result in a perceivable difference in the flow of traffic on the town's roadway networks, highlighting the need for improvements to the town's infrastructure to accommodate the additional demand and provide additional capacity.

Added volume during already congested periods will cause traffic to divert to town streets to avoid jams which will stress already stressed intersections, and potentially hamper emergency response times.

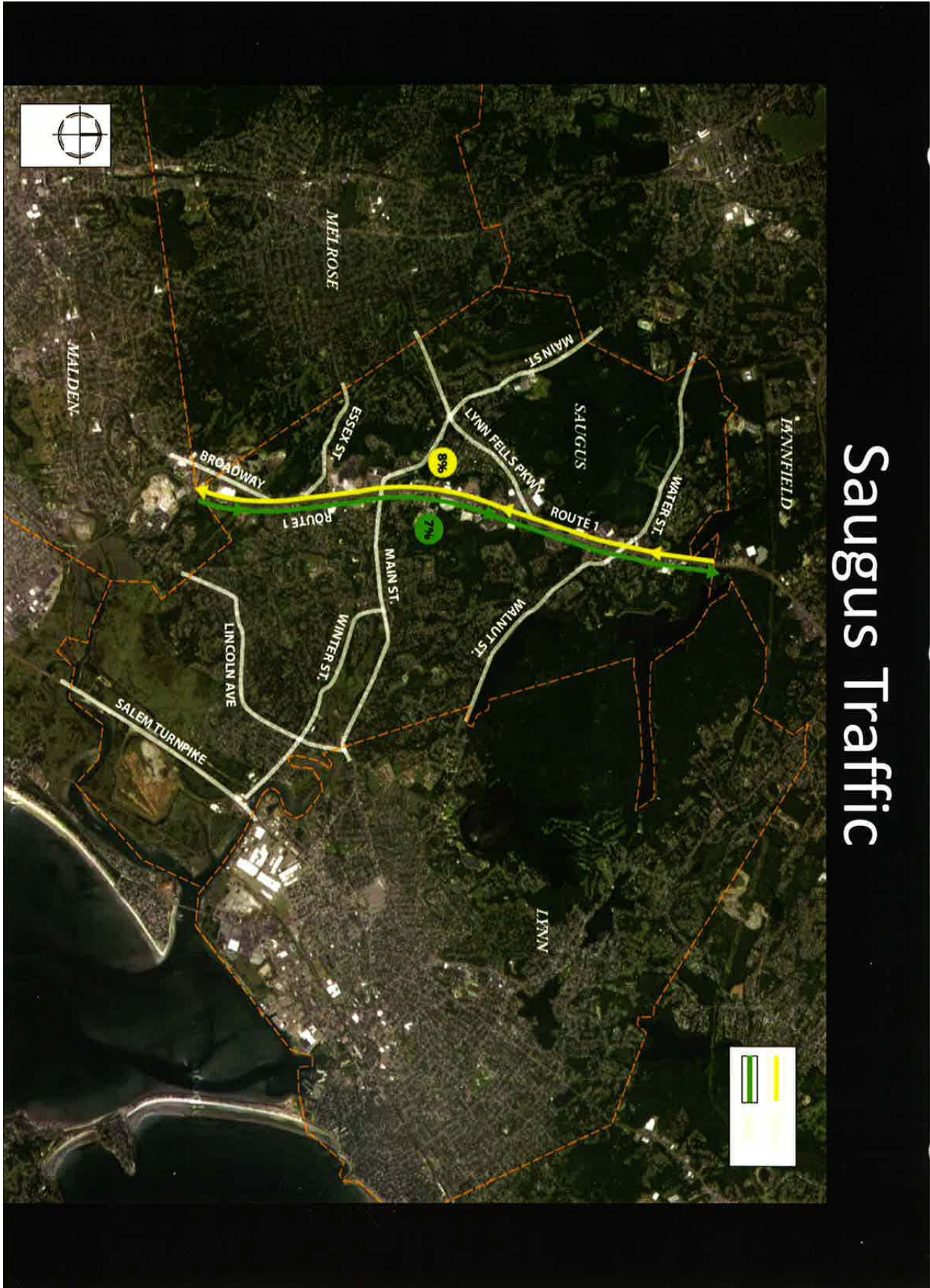
The DEIR indicates that the Route 1 Transportation Improvements will begin construction in the summer of 2019. Based on this information, it is possible that the study preparer may have assumed that the Route 1 bottleneck will have been eliminated in time for full opening of the facility.

However, the construction of the Route 1 Transportation Improvements between Route 60 (Copeland Circle) and Route 99 has not yet been funded and today remains on the long range planning list at Boston Region Metropolitan Planning Organization for 2035.

In short, what happens on Route 1, Saugus' main artery, will impact the local roadway network as well. With the proposed increase in traffic on Route 1, improvements will need to be made on Route 1 and at locations yet unstudied, unidentified in order to handle the increased demand.

B. APPLICANT RESPONSE

From 1/29/2014 Community Presentation:
Slide: “Wynn Everett Traffic Distribution”



Saugus Traffic

Wynn Everett Traffic Distribution

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

Transcript, 1/29/2014

Pg. 133, Mr. Gordon

4 First, just to remind of course
5 where they are. You've seen this many times.
6 The traffic, I do want to dwell on this for a
7 minute, especially after hearing some of the
8 presentation. We did have an opportunity to
9 review the CDM Smith information they sent over
10 to us this week.
11 The numbers right now, we are
12 showing eight and seven percent on Route 1.
13 That's slightly different than the 11 percent.
14 Again, I don't think we are misrepresenting it.
15 But the 11 percent is when you don't factor in
16 what we're going to do with employee shuttles.
17 So, the actual traffic, percentage
18 of our traffic, on Route 1 is eight and seven
19 percent. More important is what is the impact
20 on Route 1. And we don't disagree at all with
21 the issues with Route 1. And we certainly
22 don't want to argue about that at all.
10 So, again, with no disrespect, we

11 think we have a very small impact on Route 1.
So, they have about a \$65,000
21 mitigation package for that project.

Pg. 135

1 other improvements we're making for the other
2 parts of the state.
3 Again, we felt the traffic numbers,
4 and again, it isn't to argue with them, but we
5 felt the traffic numbers are so small it didn't
6 trigger anything close to a surrounding
7 community impact.

Pg. 139

1 MR. GORDON: The traffic analysis
2 took in all of the -- We did a 10-year
3 projection including any of the stuff that was
4 either built or stuff that was approved and
5 also in some cases stuff that was projected to
6 be approved. So, the 10-year window tried to
7 take in all of the development that we could
8 find.

C. RPA ANALYSIS – MAPC DEIR ANALYSIS

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 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).

Thank you for the opportunity to comment on this project.

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

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.

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.

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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

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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 Spokes*, 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

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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 off-site 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.

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- 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.

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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.

⁶Malden 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

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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

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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

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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

...

...

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.

Parking

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 long-standing 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 compare 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

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.

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 a 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 as per 250 CMR 125.00. The regulation specifies a number of considerations or factors to guide the determination of the designation and one of them include various traffic related impact factors. A number of communities have petitioned the MGC requesting 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 City of Cambridge and the Town of Saugus. This report summarizes the review of related factors as part of the overall determination relative to Saugus.

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).

Significant Peak Vehicle Trips Generation 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.

Adverse 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: Saugus

The Town of Saugus has submitted a petition to be designated as a “Surrounding Community” with respect to the proposed Wynn Casino proposed 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 Review 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 potential impact on Saugus.

MassDOT comments to date have been in relation to the ENF filed by the Applicant. At this point, MassDOT is generally comfortable with the Applicant’s overall traffic forecasts including the number of trips and arrival/departure patterns. There are some concerns relative to traffic operations and particular impacts, however, no comments were made in relation to roadways/intersections within the Town of Saugus.

GREEN Analysis

As part of the Green analysis, information contained in the DEIR as well as other 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 Wynn casino in Everett is to be located on the west side of Route 99 (Broadway). The project site is bordered by the Mystic River to the south, the MBTA Newburyport commuter rail line to the west, and commercial/institutional properties to the north. Direct access and egress to the casino is provided by two proposed driveways on Route 99. These two driveways are to be used for a primary entrance/exit for patrons and a secondary entrance/exit for employees and deliveries. Both driveways are proposed to be constructed with traffic signal control. A large proportion of the estimated project traffic (approximately 52%) is expected to use the major highway in the region (I-93), with the remaining traffic using other regional and local roadways to access to the proposed casino.

Route 99 provides a secondary access roadway between the proposed casino location in Everett and the Town of Saugus.

A review of the 2011 Top Crash Locations Report (published by MassDOT in September 2013) indicates that no intersections within the Town of Saugus are on the Top 200 crash locations statewide. A review of the MassDOT crash data for the five most recent years on record (2007-

2011) indicate that there have been a total of 983 crashes reported on Route 1 in the Town of Saugus during this 5-year period, an average of 197 crashes per year. The segment crash rate for the 4.05 mile stretch of Route 1 within the Town of Saugus was then calculated, based on the above data and standard MassDOT crash rate calculation procedures.

Additionally, the proposed casino may have an indirect impact on local roadways in the Town of Saugus, as some drivers could divert from Route 1 onto local roadways to avoid the additional congestion.

The following summarizes our analysis in relation to the factors specified in 250 CMR 125.00:

Ready Access – The proposed casino site is situated approximately 5.4 miles from the center of Saugus, if traveling along Route 99 (the most direct route). If traveling along the anticipated primary access routes (using Route 1 and Route 16), the proposed casino site is situation approximately 7 miles from the center of Saugus. Route 99 provides a direct connection between Saugus and the casino site. However, Route 1 is expected to be used by a greater proportion of casino-related traffic, and Route 1 does not provide a direct connection to the casino site.

Projected Changes in Level of Service (LOS) – There was no analysis provided nor required as part of the Applicant’s MEPA studies for Route 99 nor Route 1 in the Town of Saugus. Based on the trip distribution and trip generation information presented in the Applicant’s DEIR,

Increased Traffic Volumes on Local Streets – As noted above, the casino related traffic traveling through Saugus is expected to be approximately 185 vehicle trips on Route 1 during the Friday peak hour. Any increases in traffic volumes on local roadways would be from trips originating within Saugus, or as a result of traffic on Route 1 diverting onto local roadways. This level of increased traffic would generally be considered as minimal increases, well within the daily deviations of traffic, and not noticeable to the typical motorist.

Adverse Impact on Transit Ridership and Station Parking - there is no expected impact on transit or station parking as a result of the project that would affect the Town of Saugus.

Concluding Opinion

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. Clinton Bench, Deputy Executive Director, Office of Transportation Planning, MassDOT
- 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 16, 2014 Surrounding Community Petition Analysis for the City of Saugus (Draft), which was prepared by the MA Gaming Commission.
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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 Saugus' 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

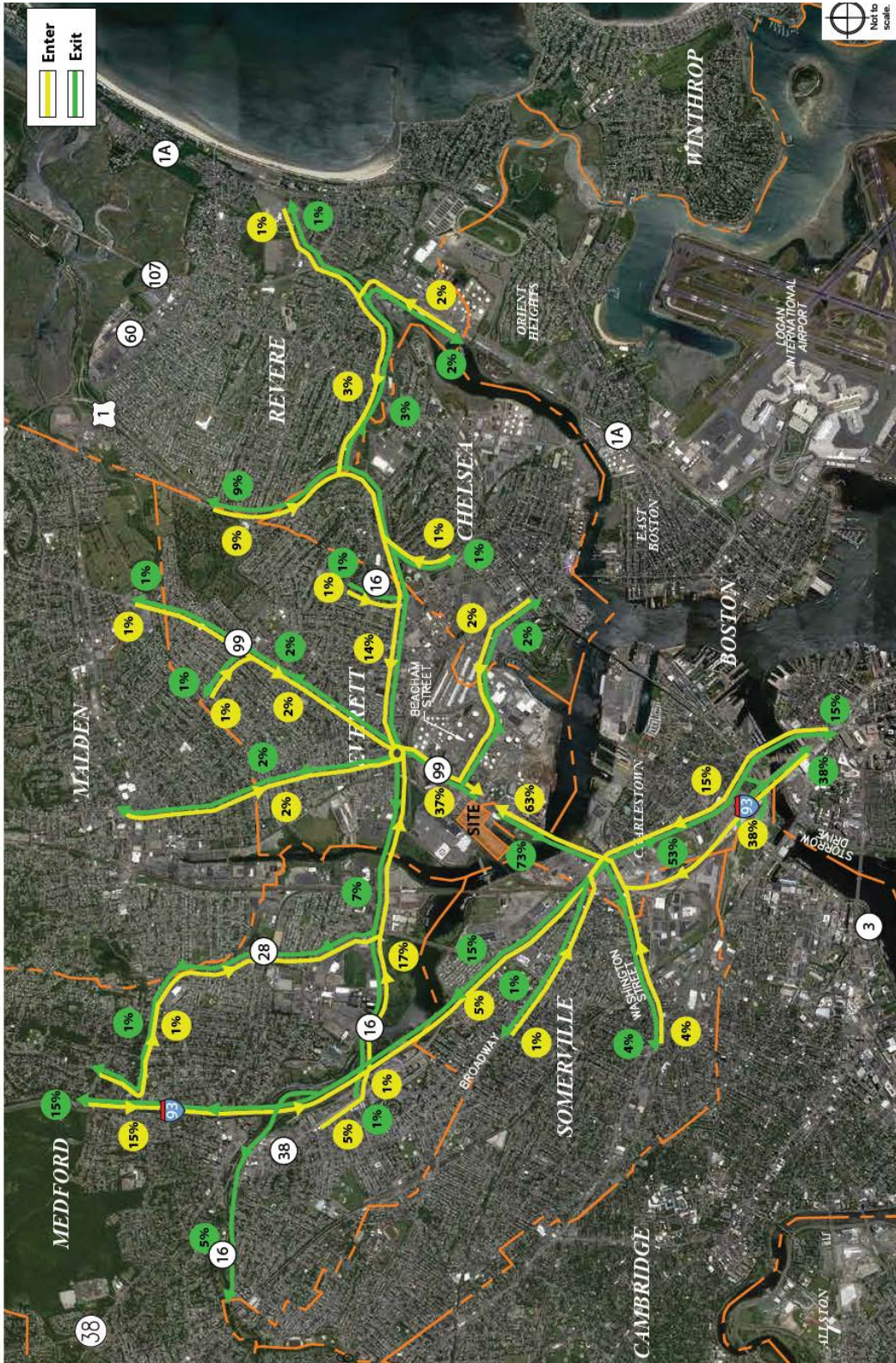
Tables 4-15 and 4-17 provide the breakdown of trips by travel mode, which yields a lower set of traffic volumes by comparison. We note however that the difference between the sets of volumes is relatively minor and not expected to change the results of their evaluation.

Trips Generated by Wynn Everett		Green	Dewberry
Friday	Daily Volumes	20,234 VPD	22,128 VPD
	Peak Hour Volumes	1,681 VPH	1,708 VPH
Saturday	Daily Volumes	24,110 VPH	26,032 VPD
	Peak Hour Volumes	1,977 VPH	2,063 VPH

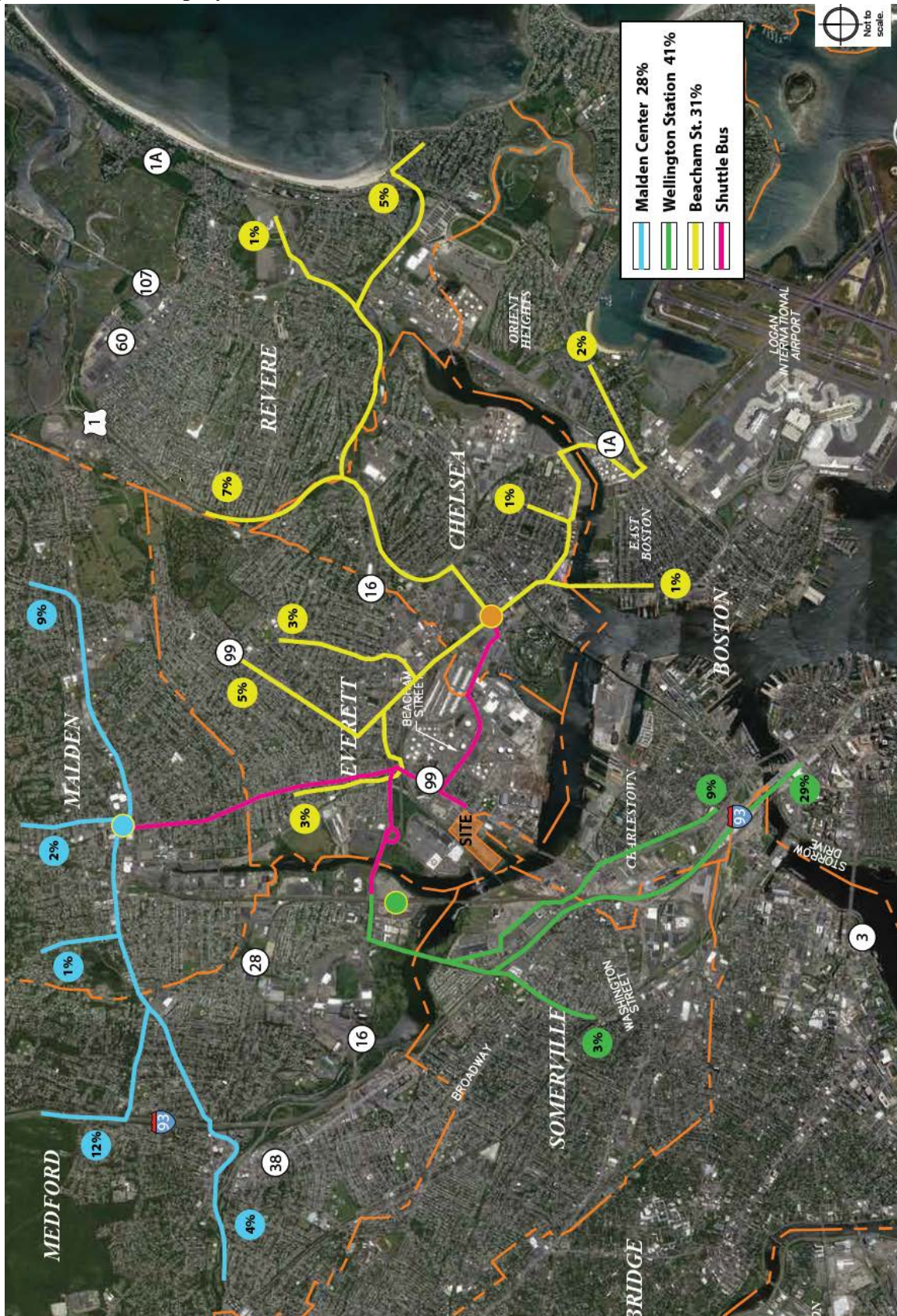
Dewberry Review of Green’s Assessment of Impact Factors

F. APPLICATION

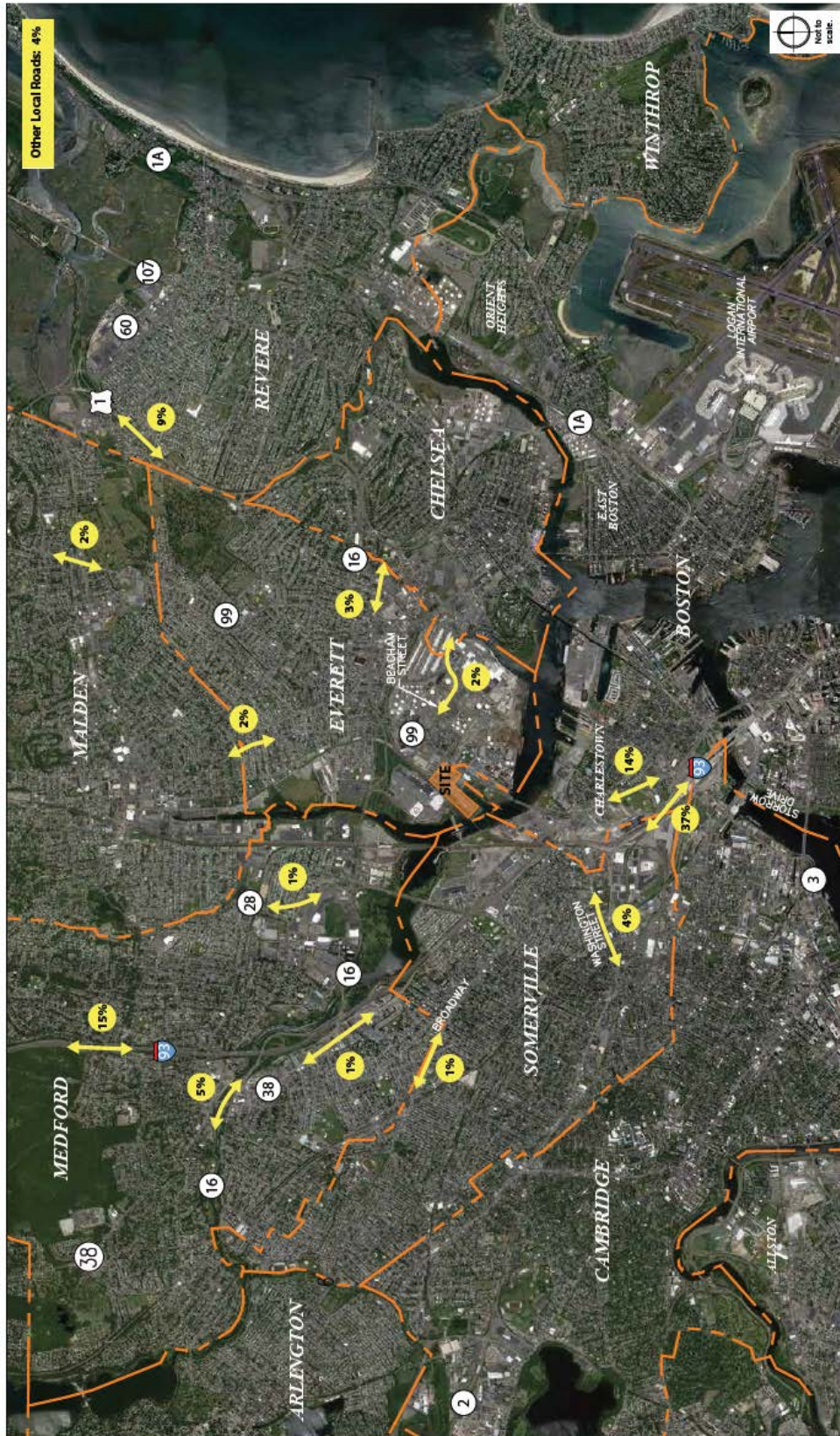
Trip Distribution (Patrons) 4-23



Trip Distribution (Employees) 4-23



Composite Trip Distribution (4-23)



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

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.

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

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

To the extent that any heavy construction equipment or hauling of debris/materials will be traveling north to or from the casino site, we similarly presume that this too would be on Route 1.

Applicant Response

Presentation slide: “Cambridge Construction Impacts:

Noise –none

Dust - none

Erosion - none

Vibration - none

Traffic - none

From transcript, January 29, 2014

Page 135, Mr. Gordon

8 Next, again, on the construction

9 impact, it's just too far away. Any of our

10 analysis didn't show any impacts for things

11 like noise, dust, erosion, vibration, traffic

12 for construction. Again, we just didn't see

13 any impact from our analysis that we did on all

14 of that for Saugus primarily because of the

15 distance it is away from the site and of course

16 from the construction.

DEIR Analysis

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 – The Applicant has stated that construction related heavy vehicle traffic could be managed. While most of the documentation to date has focused on the maintenance of traffic in the immediate construction zone, it would be anticipated that the majority of construction materials and the larger construction related traffic would utilize the major highways to access the site, I-93 in particular. At this time it is not specifically known where materials would be obtained from, however, it is anticipated that most longer haul trips would utilize the major interstate highways. In addition, construction related traffic and the facility that materials are procured from can be controlled to a large degree by the Applicant. Thus, the heavy vehicle traffic impact and consequently, local road infrastructure impact on major roadways within the Town of Saugus should be minimal.

A. COMMUNITY PETITION

To the extent that any heavy construction equipment or hauling of debris/materials will be traveling north to or from the casino site, we similarly presume that this too would be on Route 1.

B. APPLICANT RESPONSE

From 1/29/2014 Community Presentation:

Presentation slide: “Cambridge Construction Impacts:

Noise –none

Dust - none

Erosion - none

Vibration - none

Traffic - none

From transcript, 1/29/2014

Pg. 82, 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, Mr. 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.

Pg. 87, 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.

Page 135, Mr. Gordon

8 Next, again, on the construction
9 impact, it's just too far away. Any of our
10 analysis didn't show any impacts for things
11 like noise, dust, erosion, vibration, traffic
12 for construction. Again, we just didn't see
13 any impact from our analysis that we did on all
14 of that for Saugus primarily because of the
15 distance it is away from the site and of course
16 from the construction.

C. RPA ANALYSIS

No relevant documents

D. DEIR ANALYSIS

DEIR CERTIFICATE LETTER

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

None

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

The Town will also likely be impacted in other ways by a gaming facility located in the neighboring City of Everett, including public safety and quality of life effects accompanying such a facility. The Town shares in public safety resources with Everett. . . . In the event that Everett faces increased demand for its own emergency and police services resulting from a casino (such as through road crashes in connection with any alcohol use), these mutual aid calls would necessarily increase due to an accompanying "spillover" effect.

A further key area of concern to the Town is local economic impact, both to commercial entities in Saugus (customers going to the casino instead of Saugus for entertainment and meals) and in a resulting loss of tax revenue to the Town. The Town of Saugus faces materially adverse financial impacts if service, hospitality, and retail enterprises located on the Route 1 corridor experience a loss of business; this will in turn cause the Town to face the prospects of both job losses for local residents, and reductions of meals, room and real estate tax revenue receipts which are critical elements of the Town's finances.

Saugus' police, based upon years of experience with their community, further believe that a gambling location of the size and scope being proposed by Wynn, in Everett, will increase the likelihood of additional "social crimes" occurring in Saugus-- such as drug usage, domestic violence, driving under the influence, and potentially prostitution (such as at motels located in Saugus).

In the event that any businesses did close due to the new competitive challenge presented by an Everett casino, the Town's finances may be further negatively impacted due to the genuine potential for abatements being sought by owners of vacant property.

In addition, recognized social costs accompany a casino being in close proximity to a community. This could take place through Saugus' own residents confronting gambling addiction personally due to the close proximity (described in further detail above) of the proposed Wynn casino. Statistics show that incidents of addictive gambling increase significantly for those living within 10 miles of a casino, and a 1998 study showed that the rate of pathological gambling is twice as high for those living within a 50-mile radius of a casino.

Problem gambling is a known factor that geographically accompanies casinos. Saugus is not presently materially confronting this as a demand on its social services. The Town will take every effort to protect its residents and community from this risk, and alleviate any development of such a social issue. However, to the extent Saugus may be called upon provide these resources in the future, arising out of the Wynn Resorts casino in Everett, there would clearly be a causal link.

Estimated Impacts from Wynn Everett on Saugus

Earnings impact: \$2,865,290 (Population and distance estimate)

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

Transcript, 1/29/2014

Pg. 108, Mr. Ausrotas

12 ...The impact of that additional traffic
13 and congestion, potential for social crime as
14 well as the impact on the mutual aid agreements
15 which are in place which were submitted with
16 our original petition to the Commission with
17 Everett to which Everett is a party as well as
18 Saugus.

19 As to fire, Everett and Saugus are
20 both parties to a mutual aid agreement
21 comparable to the police and we'll be able to
22 hear the impact on response time when there is
23 increased congestion.

24 Furthermore, one of the impacts that

Pg. 109, Mr. Ausrotas

1 Saugus anticipates is economic in nature.
2 Saugus has a thriving and significant retail
3 component to its local economy, primarily on
4 Route 1 but throughout the community. The
Wynn

5 Resort through interviews with proprietors of
6 businesses in Saugus will be a competitor.

Pg. 113, Mr. Dimella

8 ... On Route 1, we have a number of

9 motels and small hotels that people can stay in
10 if they're not going to stay at the casino
11 themselves, which could bring about other
12 issues like OUI, operating under the influence
13 of liquor, drugs, domestic violence, social
14 issues that would be caused by the additional
15 people staying at those hotels and motels.

16 Also, potentially prostitution.

Pg. 118, Mr. Ausrotas

18 ...at least a significant
19 portion of the revenue generated by the
20 proposed resort casino would be not gaming but
21 actually entertainment and meals and the like.
22 To the extent that that is the case,
23 given Saugus's local economy, Saugus certainly
24 feels there will be an impact.

Pg. 119, Mr. Luongo

19 So, Saugus is in the unique
20 situation in which that three-mile stretch of
21 the Route 1 corridor serves as the town's
22 primary economic engine. It functions as our
23 main street, as our downtown, as our regional
24 mall, as our office park, as our light

Pg. 120

1 industrial park. We even have Saugus High
 2 School is located on Route 1. So that for us
 3 is our downtown

Pg. 120, Mr. Luongo

11 that means we get about \$1 million a year in
 12 local meals tax and a budget of about \$80
 13 million. So, that is a significant amount of
 14 taxes that we depend on to try to balance our
 15 town's budget and provide services for our
 16 citizens.

Pg. 121, Mr. Luongo

6 They basically were concerned about
 7 discretionary entertainment dollars, limited
 8 discretionary entertainment dollars being spent
 9 at the casino and they perhaps would be losing
 10 business. They've also expressed concern that
 11 even though traffic can be a plus for a strip
 12 mall development or strip developments, they
 13 fear any increases in traffic could be more
 14 detrimental to them and discourage people
 15 coming into their facilities....

...

Applicant Response

“**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.

Transcript, 1/29/2014

Pg. 88, Ms. 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

22 So, they are actually concerned
 23 about weekend traffic which we hope that the
 24 casino would be successful in drawing people on

Pg. 122, Mr. Luongo

1 weekends. But actually by increasing traffic
 2 on the weekends, less traffic would go into
 3 their establishments. ...

Pg. 123, Mr. Luongo

17...There had been a
 18 study done in 2005, it was called the Casino
 19 Gamble in Massachusetts. And basically, it
 20 said two things that I just want to bring out.
 21 It said basically commercial casinos were shown
 22 to create reduced earnings in hospitality and
 23 retail businesses located within 50 miles.

24 Also, it stated that commercial casinos reduce

Page 124, Mr. Luongo

1 general merchandise earning 13 percent among
 2 businesses inside a 50-mile radius of a
 3 commercial casino.

Pg. 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.

Page 135, Mr. Gordon

20 the actual economic impact from new
 earnings in
 21 Everett -- excuse me, in Saugus are up.
 22 They're \$3 million additional impact.
 12 With respect to mutual aid or shared
 13 services that have come up a couple of times
 14 today, I will not pretend to be schooled in all
 15 of the details of those agreements, but I will
 16 note that of the host community agreement
 \$5
 17 million of Everett's annual payment will be
 18 dedicated to community impacts that should

19 address holding up Everett's side of the 22 safety resources as necessary.
 20 bargain under those agreements. So, they will .
 21 be able to add fire, police, other public

Consultant Analysis

HLT Advisory

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

- Saugus is proximate to 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 as well as a negative impacts on local retail, entertainment and service establishments.

With respect to potential negative impacts the proposed Wynn Casino might have on local retail, entertainment and service establishments in Saugus, the Saugus Petition notes the Town's "top twenty" status in terms of meals tax revenue. Restaurants in Saugus generate about \$1 million annually in meals tax, accounting for 1.25% of the Town's \$80 million annual operating budget. A significant concentration of restaurant development has occurred along Route 1, a major commercial thoroughfare bisecting Saugus and a potential access road to/from the Wynn casino.

Saugus bases its concern over potential lost restaurant revenue on:

An informal survey of Saugus restaurateurs by Saugus' economic development coordinator. The survey of five restaurateurs on Route 1 found universal concern that an Everett casino would cause the established customer base of "middle-class individuals and families with fixed discretionary funds for...entertainment" to reduce spending.

A published study entitled "The Casino Gamble in Massachusetts" by Phineas Basandall and Bruce Sacerdote, dated January 2005 (the "Basandall and Sacerdote Report"). An excerpt from this study is used by Saugus to suggest that "commercial casinos reduced general merchandise earning 13% among business inside a 50-mile radius".

Zoning policies that dissuade mixed-use developments. Such policies have prevented, and are likely to continue to prevent, Saugus from building hotels and other hospitality projects that might benefit from visitation to the proposed Wynn Casino.

Ultimately Saugus is concerned about a potential decline in tax revenue, either directly as a result of reduced meals tax, or over a somewhat longer period if businesses are forced to close and land owners seek abatements for vacant property.

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.

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.

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.” Spending and other benefits that might accrue to Saugus were not identified in greater detail.

Saugus’ concerns that a Casino in Everett could cannibalize revenues at restaurants along Route 1, and elsewhere in the community, appears based on four 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). This finding is consistent with the TMG Consulting report prepared for Wynn that estimates 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.

Current levels of spending at Saugus restaurants (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 elimination of associated spending on travel to out-of-state destinations) should be seen as beneficial to Saugus and other regional hospitality and entertainment providers.

A belief in demand substitution—A perception exists 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. 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 Saugus’ traditional customer base are largely dissimilar.

Urban casino development—Unlike rural or remote casinos developed in areas lacking a concentration of commercial and related retail activity (e.g., Indian casinos such as those identified in the 2005 Basandall and Sacerdote Report), the proposed Wynn Casino will be developed within a vibrant metropolitan area. The Wynn Casino, while a significant and unique entertainment destination, will be surrounded by a wide array of established local, retail, entertainment and service establishments where competitive influences occur on a regular basis.

Failure to consider potential positive impacts—The Saugus Petition makes no reference to the potential positive impacts from a casino located in Everett. Positive impacts to the region arising from the development and operation of the Wynn Casino include:

Direct employment— Wynn proposes to hire 3,123 full-time staff to operate the Casino—at an average salary of \$41,500—generating total payroll in the order of \$130 million

New visitors to the area – TMG Consulting projects more than 3.4 million visits from outside a 60-minute drive of the Casino

RKG Associates estimate that Wynn will purchase \$40 to \$50 million of operating supplies and services from regional vendors to support non-gaming operations.

Based on our review of the materials provided by Saugus and Wynn, as well as our knowledge of the casino gaming industry, we do not believe that Saugus' local retail, entertainment and service establishments will experience any meaningful negative impacts from the proposed Wynn Casino (considering business competitiveness as opposed to other impediments that may arise such as increased traffic). In fact, given the expected increase in visitation to the region, some Saugus businesses may experience increased patronage.

City Point Partners Analysis

“This memo concludes that neither the Wynn Casino nor the Mohegan Sun Casino will impact the water and sewer services in proximate communities including (for Wynn Casino) Saugus....”

LDS Consulting Group Analysis

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

[A]s 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.

Housing Vacancy Rates: ...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...

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.

[T]he 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

Saugus cites the following concerns about potential social impacts:

The Town of Saugus shares in public safety resources with the host community, Everett. In the event that Everett faces increased demand for its own emergency and police services resulting from a casino (such as through road crashes in connection with any alcohol use), these mutual aid calls would necessarily increase due to an accompanying “spillover” effect. (p.2)

Social costs accompany a casino being in close proximity to a community. This could take place through Saugus' own residents confronting gambling addiction personally due to the close proximity of the casino. (p.3)

Wynn MA's RFA-2 application references numerous measures intended to mitigate problem gambling and related social problems but doesn't state specifically how this may address the concerns raised by the Town of Saugus.

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

It seems logical to conclude that the increase in persons with gambling disorders would create a burden on the Saugus' 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.

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

. The two communities—among others— are parties to mutual agreements concerning emergency and police services. *See, e.g.* Exhibit B (Mutual Aid Agreement) and Exhibit C (Memorandum of Understanding).

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The Town will of course seek to mitigate these anticipated impacts to the greatest extent possible, and recognizes that there may well be potential benefits the proposed facility could bring to the regional economy. Even with positive effects, though, it bears mention that these too could have an impact on the strained resources of the Town. For instance, if the Town's population were to increase due to casino employees moving to Saugus, this may require an accompanying increase in school construction; the Town's schools are presently at- or over-capacity.

JANUARY 29, 2014 STATEMENT IN SUPPORT OF SURROUNDING COMMUNITY DESIGNATION FOR SAUGUS MASSACHUSETTS IN CONNECTION WITH WYNN RESORTS APPLICATION

The two communities are parties to the same metropolitan fire district: Everett responds to Saugus fire station calls, and Saugus responds to Everett's.. Saugus' annual outlay for police and fire services is currently slightly under \$10 million dollars, and any increased demand on these public officials will further strain the Town.

B. Local Retail, Entertainment and Service Establishments

Saugus businesses encompass a breadth of economic diversity, from high-end consumers to working- and middle-class meals and entertainment.

The Town's economic development coordinator, Robert Luongo, has interviewed several venues located in Saugus, including restaurants, which are deeply familiar with the clientele and consumer base which support their businesses. Specifically, Mr. Luongo conducted an informal survey of five restaurants on Route 1 that could be impacted by the casino development: three of these restaurants are upscale, and two have large followings based on entertainment that is provided on-site at their facilities. Some restaurants noted that increased volumes especially on weekends, when the casino would be at its busiest

point, could have a negative impact on patronage. In addition, Town has reviewed at least one published study, a report entitled "The Casino Gamble in Massachusetts," by Phineas Baxandall and Bruce Sacerdote, (Release date: January 13, 2005), which found, among other things, that:

- Commercial casinos are more likely to reduce unemployment but, unlike Indian casinos, their presence is also correlated with increases in crime, and reduced earnings in hospitality and retail businesses located within 50 miles radius; and

- Commercial casinos reduced general merchandise earnings 13% among businesses inside a 50-mile radius.

The results of Mr. Luongo's informal survey reflect that Saugus' businesses share concerns over a similar impact as that found in this study happening to them, based upon their own understanding and knowledge of their own customer base.

Finally, the commercial tax base is vital to the Town's finances. In the event that any businesses did close due to the new competitive challenge presented by an Everett casino, the Town's finances may be further negatively impacted due to the genuine potential for abatements being sought by owners of vacant property.

C. Social Service Needs

Problem gambling is a known factor that geographically accompanies casinos. Saugus is not presently materially confronting this as a demand on its social services. The Town will take every effort to protect its residents and community from this risk, and alleviate any development of such a social issue.

From transcript, 1/29/2014

Pg. 108, Mr. Ausrotas

7 And getting onto the question of
8 operational impacts, so to speak, of the
9 proposed casino, Saugus really does believe,
10 and you'll hear from its officials that there
11 are a few public safety impacts with regard to
12 police.

7 It would not necessarily just be a
8 rising tide lifting all boats, but it will be a
9 situation where people with limited income
10 would choose one or the other. And that would
11 reflect and impact both on Saugus's meals tax
12 as well as in the event of any businesses that
13 were lost potential abatement as to its
14 properties.
15 In addition, we'll hear about very
16 specific issues with regard to Saugus
17 historically and its zoning, its current zoning
18 laws, and its present inability in any instance
19 to take advantage of what would be seen as
20 secondary impacts, positive impacts of the Wynn
21 casino.

Pg. 112

6 MR. AUSROTAS: If I could, I'd like
7 to now move onto what would be potential likely
8 public safety impacts. With that if I could
9 ask Chief DiMella to take the microphone and
10 discuss that further.

11 MR. DIMELLA: Good morning.
17 People, when Route 1 is tied up now,

18 they find the back roads in Saugus to try to
19 avoid those traffic jams on Route 1. It's a
20 very heavily traveled road. And I believe
Pg. 113

1 So, I believe it will definitely
2 have an impact, a detrimental impact on traffic
3 and put a strain on our resources as a police
4 department.

5 Another thing that I believe would
6 be a fallout from the casino, not necessarily
7 at the casino but around the casino, would be
8 social crimes. As
17 you know, that can be a fallout from a business
18 like this. So, social crimes that would be
19 another issue that put would an additional
20 strain on the police department.

21 Also, we have an MOU signed with
22 Everett, Chelsea, Malden and Revere where we
23 share our resources, our detectives and police
24 officers. And it's been in effect for a while

Pg. 114

1 because as you know, crimes don't stay in one
2 specific area. They cross borders.

3 So, As the MOU was
7 signed with Everett, Chelsea, Malden and
8 Revere, three of those communities are
9 designated as surrounding communities.

10 So, I believe the MOU shows that
11 we've already been collaborating with them. We
12 have a signed MOU. And our resources are
13 always used together to try to combat these
14 crimes.

15 In closing, I believe those are the
 16 three major areas that will impact my
 17 department. Thank you.
 Page 117- Mr. McQuaid
 17 This is going to be a very large
 18 building, thousands of fire prevention devices
 19 in the building. Everett is going to be tied
 20 up much more often going to these buildings.
 21 This whole situation is going to affect Saugus.
 22 I'm not sure what the term was but people from
 23 Lynn that are going to be coming through Saugus
 24 to get to Everett. So, it definitely affects

Page 115

1 probably you might know the percentage of the
 2 accidents that we book rather than the State
 3 Police because of their limited resources.
 4 It's probably somewhere north of 80 percent of
 5 the accidents up on Route 1 that we handle and
 6 the incidents and calls.

7 MR. DIMELLA: Yes. Historically, we
 8 have patrolled Route 1. We share with the
 9 State Police. But in Saugus we predominately
 10 book most of the accident there.

...

16 MR. AUSROTAS: Chief McQuaid, if you
 17 could speak as to the fire department.

18 MR. MCQUAID: Good morning. Looking
 19 at this situation from my perspective as the
 20 Fire Chief, as the Wynn representative said,
 21 it's all about the increase in traffic the
 22 casino will cause. Saugus doesn't have a large
 23 fire department. We have a ladder and two
 24 pumps in service.

Page 116

1 If there's more traffic on the
 2 highway, there's going to be more accidents.
 3 It's short and sweet. It's simple. If we have
 4 apparatus tied up on the highway, a building
 5 fire on the other side of town, it could
 6 significantly affect how we fight the fire, put
 7 the guys in danger, put the civilians in
 8 danger. It's definitely going to affect us.
 9 It's basically coming from the North
 10 Shore, you've got to use Route 1. That's going
 11 to be the main thoroughfare. Again, more
 12 people on the highway, more accidents. We have
 13 6:30 in the morning until 9:30 the morning with

14 real bad on Route 1 and then again in the
 15 afternoon.

16 As the Wynn representative said,
 17 maybe the times will be different because it
 18 won't be until 9:00 in the evening when their
 19 traffic hits. But when they're leaving the
 20 casinos, potentially one or two of them might
 21 have had a drink. So again, they're going to
 22 be coming back down Route 1 going home,
 23 accidents again.

24 If we have backups on the highway,

Page 117

1 our response times are going to be more
 2 difficult. It's going to take us longer to get
 3 there. The quicker we get there, the better it
 4 is for the patients that are injured on the
 5 scene.

6 We also have a reciprocal agreement,
 7 Saugus and Everett and all of the surrounding
 8 communities are in the Metro fire district.
 9 Again, I'm going to get back to the traffic.
 10 It's 35 communities all in the Metro fire
 11 district. And if we can't get from one place
 12 to another, if Everett has a fire, if Saugus
 13 has a fire, like I said, the mutual aid, they
 14 come to us, we go to them. It's just going to
 15 be more difficult to get anywhere you need to
 16 go. The response times are going to be longer.

Pg. 118

1 Saugus.

2 MR. CRABTREE: Mr. Chairman, it
 3 should be noted also to the Commission that the
 4 fire stations that we have, we have two fire
 5 stations. And as the Chief talked about, both
 6 of those stations are located on the east side
 7 of Route 1.

8 So, we don't have a station that's
 9 on the west side on the other side of Route 1.
 10 Obviously, with the traffic impact and what we
 11 think with our overpasses and interchanges that
 12 that could cause more significant time delay to
 13 get to the other side on the west side of the
 14 town to answer calls.

15 MR. AUSROTAS: Really moving onto to
 16 what I also call the economic and retail
 17 impacts, it's my understanding from the
 18 applicant Wynn that It's economic

Pg. 119

1 development coordinator, Mr. Luongo, again
 2 without the benefit a complicated economic
 3 survey as they would perform an informal survey
 4 of businesses in Saugus to discuss what impact
 5 they foresee. So, I would like to pass the
 6 floor to Mr. Luongo
 7 MR. LUONGO: Good morning, Mr.
 8 Chairman, Commissioners. I'm here to briefly
 9 talk about the impacts of the casino on the
 10 local retail, entertainment and service
 11 establishments in Saugus. And just let me
 12 quickly set the stage.
 13 Saugus is a bedroom community of
 14 about 11 square miles. Basically

4 And quite frankly, without a vibrant
 5 Route 1, the town of Saugus will be in serious
 6 financial constraints. That's kind of like the
 7 stage I'd like to set.
 8 Saugus is one of the top 20
 9 communities in Massachusetts in terms of
 10 revenue generated by local meals tax. To us,

17 Our businesses on Route 1 really
 18 encompass a wide breadth. We have quite a
 19 diversity, as I mentioned. We have high-end
 20 establishments. And then we service the middle
 21 and working class as well on Route 1.
 22 I did an informal survey. I'm a
 23 staff of one. So, I don't have a large budget.
 24 Maybe the town manager will increase it if I do

Pg. 121

1 well. Basically, I've interviewed five
 2 establishments on Route 1. And they're mostly
 3 restaurants and entertainment venues. And
 4 spoke to them about what they felt the impacts
 5 would be.

16 If any of you have ever traveled on
 17 Route 1, you know you are taking your life in
 18 your hands either in ingress or egress into a
 19 facility. I do that every day and I make the
 20 sign of the cross as I go out in there. It can
 21 be brutal.

Pg. 122

Pg 123, Mr. Luongo

1 We're not asking for them to do our
 2 zoning for us or create other opportunities for
 3 us. I think our traffic engineer can attest to

4 the fact that we have one of the highest
 5 accident rates. Our interchanges at Main
 6 Street and Walnut Street and Essex Street have
 7 some of the highest accident rates in the
 8 state.

9 Increasing the traffic volume,
 10 especially on weekends could create more
 11 problems. So, one the asks is probably to help
 12 us look at some of these traffic issues that
 13 are impacting the Route 1 corridor as a result
 14 we feel of some increased traffic obviously on
 15 Route 1 to go to the casino.

16 There are tons of studies out there.

17 I just quickly did a search.

4 This study kind of like reinforces
 5 what I heard from the five businesses that I
 6 had interviewed about their concerns about
 7 losing revenue from the project. Even though
 8 more people will be traveling through Saugus,
 9 the traffic congestion created, the
 10 configuration of the roadways would probably
 11 make them loose business.

12 I'll quickly wrap up here. I don't
 13 want to monopolize this. Basically, what we
 14 are doing with the Route 1 area is we are
 15 rethinking land uses along the corridor. We
 16 need to do this in order to be more
 17 competitive.

18 Unfortunately, Route 1, if you're
 19 familiar with it, is surrounded on both sides
 20 of the north and south side residential
 21 properties. So, there's not much opportunity
 22 for us to rethink and capture more market
 23 share. Our zoning right now prohibits or
 24 dissuades hotel development because of these

Pg. 125

1 issues with traffic and the abutting
 2 residential area.

3 We are still looking at
 4 opportunities to create zoning so we can
 5 capture some of the hopefully positive economic
 6 generations from the Wynn development.

7 But right now, we need to maintain
 8 what is in place because what is in place is
 9 giving us revenue to support our services in
 10 Saugus. So, if we start losing businesses in
 11 Saugus, we're going to have a difficult time in
 12 creating the services for the residents of our
 13 community.

14 I thank you for the opportunity to
 15 speak with this morning and be happy to answer

16 any questions.

17 COMMISSIONER STEBBINS: A couple of
18 quick questions. How many hotels run along
19 that Route 1 strip?

20 MR. LUONGO: In Saugus? The strip
21 goes all of the way up to Danvers, basically.
22 Scott, do you know?

23 MR. CRABTREE: Essentially, I think
24 we have in Saugus we have one hotel. We have a
Pg. 126

1 Red Roof Inn, a Holiday Inn Express, and we
2 have a couple of motels. We have three or four
3 motels that are located on Route 1 that are
4 somewhat, and I think the Chief touched upon it
5 a little bit, the Police Chief, somewhat
6 problematic with different issues there crime
7 wise and drugs and whatnot. That's essentially
8 how the makeup is of motels and hotels.

9 COMMISSIONER STEBBINS: Do you have
10 any estimate as what the occupancy rate is?
11 Obviously, it can fluctuate depending on the
12 time of year.

13 MR. LUONGO: It could be up as high
14 in some periods of 80 percent. There's a lot
15 of activity because of the airport. Obviously,
16 that's a generator for us. There is a fairly
17 high occupancy rate at certain times, people
18 who don't want go into the airport and stay or
19 go into Boston and stay. There's obviously
20 people from the North coming down from New
21 Hampshire and Maine.

22 MR. CRABTREE: There has been
23 development with some hotels that are over the
24 line into Peabody in the last recent years.

Pg. 127

1 But Saugus historically, as Mr. Luongo spoke
2 about, zoning wise is not in a position to be
3 able to embrace that type of development.

Page 131 – Mr. Crabtree

19 In looking at that I wanted to
20 reiterate we're an \$80 million dollar budget
21 that's \$1 million dependent in present day
22 money on the meals tax and room tax that we
23 generate that allows us to -- I think if we had
24 a 10 percent decrease or a 20 percent decrease

Pg. 132

1 because obviously when you're building a
2 casino, part of it is to have entertainment and
3 to keep people there.

4 And the people are going to choose,
5 and like we talked about the pie is only so

6 big. They're either going to spend here or
7 there. That is sort of our lifeline of what
8 allows us to reclassify taxes so that the
9 commercial tax base and the sustainably that
10 allows us to provide services to the community.

11 So, those are I guess the biggest
12 concerns and I think that puts us different
13 than some of these other communities, even
14 communities that have been designated as a
15 surrounding community and how we would be
16 significantly adversely affected in that
17 manner.

Pg. 135, Mr. Gordon

17 Next, the economic impact, we found
18 were positive. In a minute, Kim will talk more
19 about the question of Route 1 businesses. But
20 the actual economic impact from new earnings in
21 Everett -- excuse me, in Saugus are up.
22 They're \$3 million additional impact.

Page 139 – Mr. Crabtree

9 COMMISSIONER ZUNIGA: Thank you.

10 CHAIRMAN CROSBY: What's going in
11 where Hilltop is?

12 MR. CRABTREE: We are still working
13 on that hoping to partner with them. And we're
14 actually awaiting an MAPC grant to give us some
15 technical assistance with the rezoning.

16 COMMISSIONER MCHUGH: Are you going
17 to keep the cactus?

18 MR. CRABTREE: It probably will not
19 come down at least the stand. We have a lot of
20 sign bylaws now that don't grandfather anybody
21 in.

22 CHAIRMAN CROSBY: An actual historic
23 monument.

24 MR. CRABTREE: Mr. Chairman, I just

Pg. 140

1 wanted to add one point regarding the mutual
2 aid, they talk about the mutual aid agreements.
3 I think that's great. The Fire Chief if he
4 wanted to speak on it, he could, is that And that's
the way the agreement is

14 set up. So, unless there's some change in that
15 agreement or some regional approach that deals
16 with this financially, we would be impacted and
17 not have the direct dollars to deal with that. 24

24 MR. DIMELLA: We have 54 sworn

Pg. 141

1 officers from me on down. We serve a
2 population of roughly around 26,000 people.

3 With Route 1, we have a lot of urban problems

4 because of the businesses on Route 1, the bars
5 and restaurants. So, that impacts us a lot.
6 We are a fairly small department. And again,
7 we have some urban problems because of Route 1,
8 which severely strains the department.
9 COMMISSIONER STEBBINS: You have

10 just one station?
11 MR. DIMELLA: We have just one
12 station, yes.

B. APPLICANT RESPONSE

From Wynn’s 1/29/2014 Community Presentation:
 Slide: “Saugus Community Impacts”

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

Page 135 – Mr. Gordon

17 Next, the economic impact, we found
 18 were positive. In a minute, Kim will talk more
 19 about the question of Route 1 businesses. But

Pg. 136, Ms. Sinatra

14 That said, we had completed all of
 15 this type of analysis for the entire region.
 16 When we met with Saugus after their petition,
 17 we did offer them what we call our neighboring
 18 community agreement, which addresses some of
 19 the concerns that they raised today.
 20 That includes participation in our
 21 concierge program, co-marketing on some of
 22 their food and beverage outlets, marketing to
 23 our employees. We provide sometimes subsidies

24 for our employees to use in area businesses.

Page 137

1 So, there were items like that that we did
 2 offer to Saugus because as I say, we've been
 3 quite rigid about adhering to the regulatory
 4 requirements with respect to official
 5 designations as a surrounding community.
 6 That said, we are interested in
 7 regional prosperity as a result of our entry
 8 into the market if we are so lucky. So, the
 9 conversations will continue with Saugus and
 10 other communities who believe they are
 11 affected.

22 safety resources as necessary. That's all I
 23 have.

C. RPA ANALYSIS

No relevant documents

D. DEIR ANALYSIS

No relevant documents

E. CONSULTANT ANALYSIS

HLT: Town of Saugus Surrounding Community Status Petition

As requested, we are submitting this letter report with respect to a request by the Town of Saugus (the “Town” or “Saugus”) 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.

Wynn rejected the Town’s request. As a result, the Town petitioned the Commission to adjudicate its request for Surrounding Community status in a letter dated January 9, 2014 (“Saugus Petition”), and appeared before the Commission on January 28, 2014. Wynn subsequently responded to the Town’s petition in a document dated February 5, 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 Saugus.

To complete this assessment we:

- Reviewed the Petition and related correspondence between the Town, Wynn and/or the Commission.
- Reviewed applicable sections of Wynn’s Category 1 Application including sections addressing host and surrounding communities, business plans and market focus as well as economic impact. We also reviewed the following reports that were appended to the application:
 - o Wynn Everett Gaming Market Assessment, November 2013 prepared by TMG Consulting
 - o Impact of the Wynn Resort Casino on Neighboring Communities, August 29, 2013 prepared by RKG Associates Inc.
- Reviewed the following background documents:
 - o 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”).
 - o Massachusetts Statewide Gaming Report, June 2010, prepared by the Innovation Group for the Massachusetts Senate, Commonwealth of Massachusetts.
 - o New England Casino Gaming Update, 2013 prepared by the Center for Policy Analysis, University of Massachusetts Dartmouth (the “Center for Policy Analysis Report”).
- Attended the Commission’s January 28, 2014 meeting where both the Town of Saugus and Wynn presented their respective positions on the issue.

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.

- Accessed other information and benchmarks in our files relevant to this situation. Upon completion of these steps we completed the following letter report.

3. BASIS FOR THE SAUGUS 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, a 1,000 seat multi-use space and a 500-seat outdoor amphitheatre.

-

5. ISSUES AND CONSIDERATIONS

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.”

- . These staff will live in communities throughout the region, predominately in Everett but also in neighboring communities such as Saugus. RKG Associates estimates that Casino employees will spend between \$15 and \$23 million per annum on food and other retail goods and services in the area.
 - o . These new visitors represent a market opportunity for the Saugus retail, entertainment and cultural establishments.
 - o Purchases of Goods and Services –

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

6. CONCLUSION

CITY POINT PARTNERS

Surrounding Community Impacts – Water and Sewer
 Wynn/Everett
 City Point Partners LLC
 2/13/2014 (Revised 3/14/2014)

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.

MWRA System	WATER, MGD			WASTEWATER, MGD		
	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
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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%

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

MARK VANDER LINDEN ANALYSIS

On January 9, 2014 the Massachusetts Gaming Commission (MGC) received a petition from the Town of Saugus to be designated as a surrounding community by Wynn MA, LLC.

To facilitate an evaluation of the issues cited by surrounding communities, Wynn MA, LLC employed the services of RKG Associates, Inc. I couldn't find evidence in the RKG report that specifically addressed concerns about increase in problem and disordered gambling. In relation to Saugus' concerns about increased demand on safety resources, 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".

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

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.

- 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.

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.

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.

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

Social and Economic Impact of Gaming in Massachusetts

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

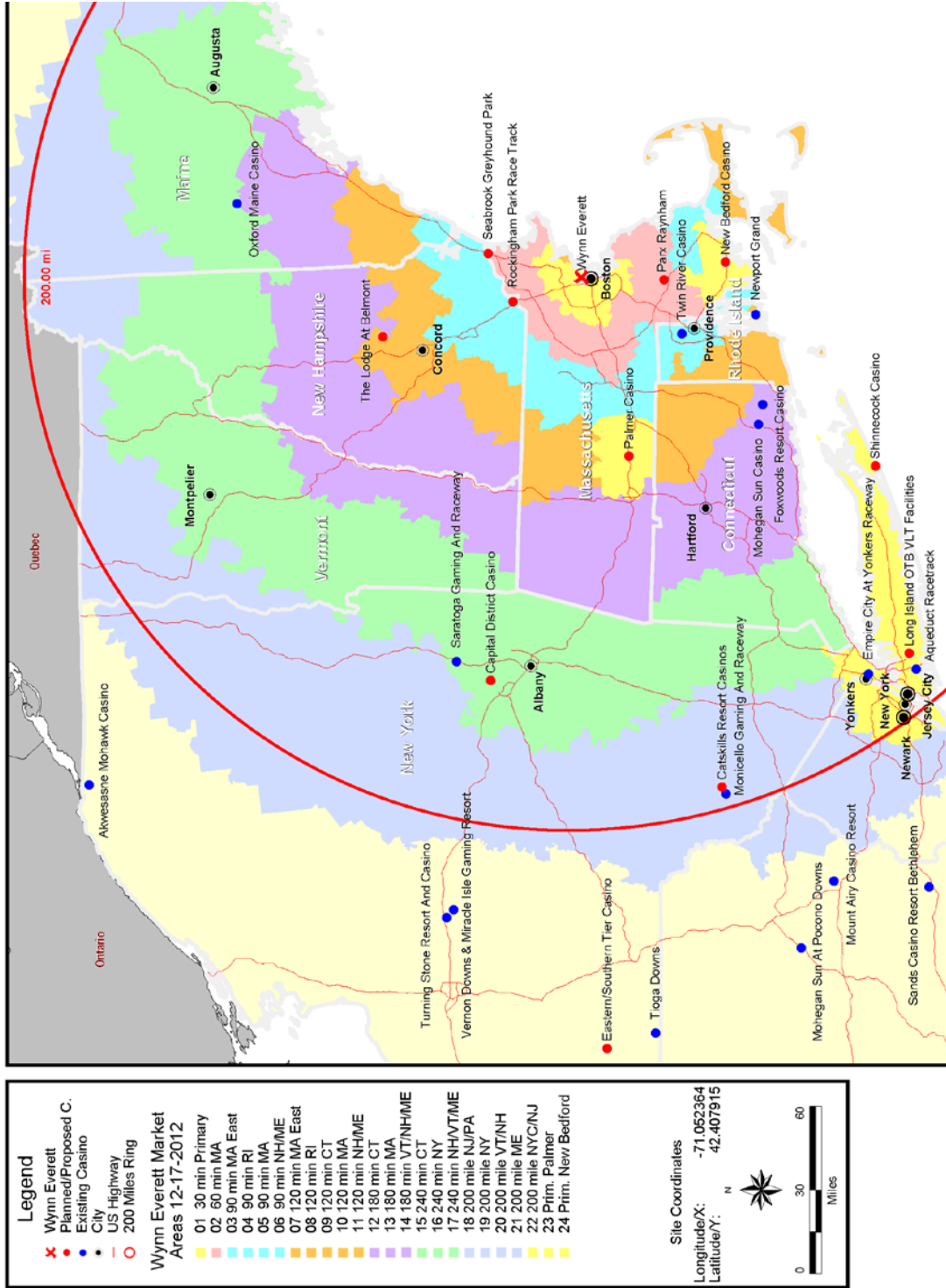
Wynn Everett will operate as a casino hotel, but will benefit somewhat from the significant tourist visitation to the area. The hotel is expected to be a boutique luxury property, targeting primarily high yield gamers, both domestic and international. Wynn Everett hotel is not expected to be directly 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
<i>(Less Local Hotel Market Capture)</i>	<i>-\$11,649,298</i>
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

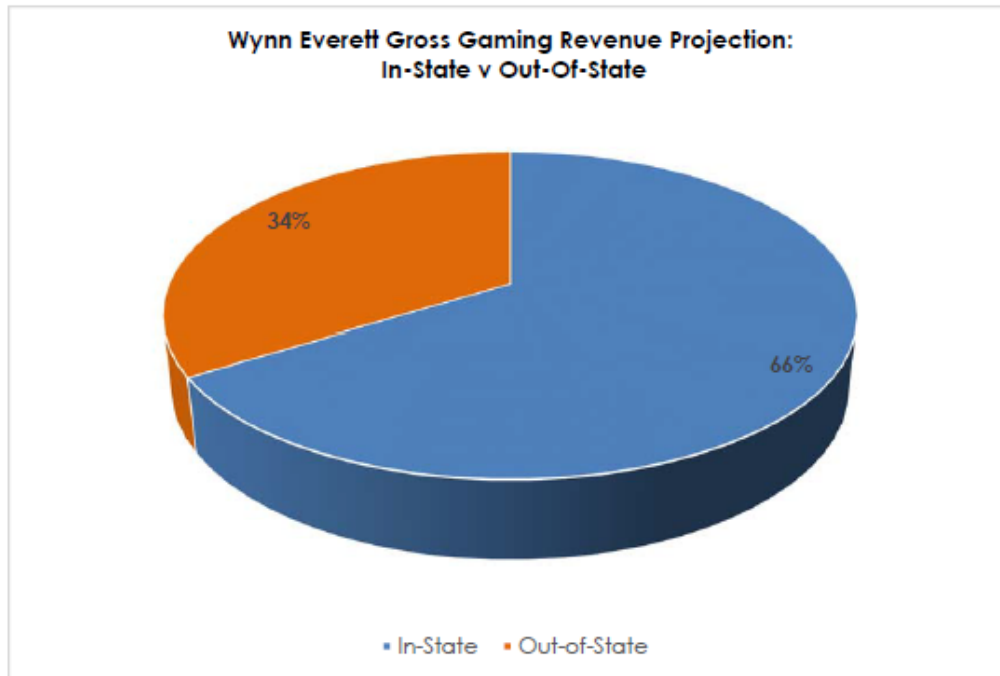
Source: Wynn Resorts; TMG Consulting Analysis

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.

The Wynn Resort in Everett will be required to remove inflow/infiltration (I/I) to offset the anticipated wastewater flows generated by the Project. According to MWRA maps, the wastewater system for the entire City of Everett contributes to the North Metro Relief Sewer. The DeLauri Pump Station is the primary source of combined sewer overflows (CSOs) in the vicinity of the project with the CSOs contributing to pathogen concentrations in the Mystic River. The pump station is located southwesterly of the site and receives flows from several nearby municipalities including Somerville, Charlestown, and parts of Cambridge and Medford and delivers these flows downstream to the North Metro Relief Sewer. Therefore, the project's contribution to I/I removal is expected to reduce the CSOs associated with the DeLauri Pump Station.

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

None

A. COMMUNITY PETITION

JANUARY 29, 2014 STATEMENT IN SUPPORT OF SURROUNDING COMMUNITY DESIGNATION FOR SAUGUS MASSACHUSETTS IN CONNECTION WITH WYNN RESORTS APPLICATION

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

No relevant documents

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

See below.

A. COMMUNITY PETITION

No relevant documents

B. APPLICANT RESPONSE

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

Slide: "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

RKG Neighboring Community Report

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 — www.rkgassociates.com

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	Everett	3,090	14.6%	Everett	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	3.2%		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
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.

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.

C. RPA ANALYSIS

No relevant documents

D. DEIR ANALYSIS

No relevant documents

E. CONSULTANT ANALYSIS

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. as a result of ongoing operations. 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

No relevant documents