

**Bresilla, Colette (MGC)**

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**From:** Timothy McManus <badge17@comcast.net>  
**Sent:** Tuesday, August 12, 2014 11:46 AM  
**To:** MGCcomments (MGC)  
**Subject:** MAPC Report

Like everything based upon the report it appears the negatives being mentioned concerning the Wynn proposal is mostly concerning Boston and the mitigation regarding traffic at Sullivan Sq. and Rutherford Ave. area. It would certainly appear that giving everything being said would indicate that Everett would never be truly allowed to develop this property. More congestion in traffic would occur if there was a mall being developed in that location. There would be far little mitigation expenditures for Boston traffic and business.

I traveled and worked in Boston most of my life and can tell you I never ever heard of any concern for traffic coming through Everett when Boston developed the west end or any other area. Nor was there any concern about 1A when Boston was developing the waterfront district. I couldn't help but notice the report was delivered the day before your August 7th hearing and yet the report speaks about the Commission would need to Mitigate due to Wynn's FABO. Therefore this had to be written prior to the Commission ruling. Reading that report it seems although they said it has no preference but I can't believe that statement.

Timothy P. McManus

John Vitagliano  
EVERETT

19 Seymour Street  
Winthrop, MA 02162  
617-846-1105

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Appendices  
on file

August 11, 2014

Massachusetts Gaming Commission  
84 State Sreet  
Boston, MA 02109

Subject: Wynn-Everett Casino Proposal Conflicts With Liquefied Natural Gas Carrier (LNGC)  
Vessels in Boston Harbor and LNG Facility in Everett, MA

Dear Mass. Gaming Commission Members:

I respectfully submit these comments in regards to the Wynn-Everett exaggerated claims concerning water transportation site access in their FEIR, EEA No. 15060, in particular the sections in Chapter 4 concerning the claim that 6% of the project's patrons and 3% of its employees will access their site by water transportation, a projection that I strongly dispute. Based on my experience in Boston inner harbor improvement programs as a former Massport board member and most recently as a consultant on the new Chelsea Creek vertical lift bridge, involving working closely with the key Boston Harbor regulatory agencies such as the US Coast Guard, US Army Corps of Engineers, the Massachusetts Port Authority, MassDOT and others, I estimate that the Wynn-Everett water transportation passenger ridership projections of 6% and 3% are inflated by at least 100% in both patron and employee categories, even assuming optimum year round maritime operating conditions such as weather which rarely occur. I also question certain intrinsic safety aspects of the Wynn Everett as noted herein.

A significant factor undermining the Wynn-Everett water ridership projections is that of the bi-weekly closure of the inner harbor by liquefied natural gas carrier (LNGC) vessels supplying the LNG storage facility at the Dstrigas facility in Everett located on the Mystic River approach to the Wynn-Everett casino site. This bi-weekly inner harbor LNG closure is mandated by US Coast Guard regulation, specifically Title 33 of the US Code of Federal Regulations as follows:

1. No vessel is allowed within two miles ahead and one mile astern of a LNGC vessel underway, nor within 500 yards on either side of such vessel. This essentially closes the segment of the inner harbor from the World Trade Center and Long Wharf to the Tobin Bridge that constitutes the Wynn-Everett water transportation route.
2. No vessel is allowed within 400 yards of an LNGC vessel moored at the Dstrigas facility in Everett. This essentially closes the segment of the Mystic River required in the Wynn-Everett EIR for ferries to access their site. This condition typically lasts for 24 hours while the LNGC vessel unloads its cargo.

This regular bi-weekly LNGC inner-harbor closure alone represents approximately a 13% reduction of harbor availability for the Wynn-Everett water transportation ridership estimates. In addition to the LNGC harbor restrictions the US Coast Guard also restricts vessel traffic under the auspices of Title 33:CFR for non-LNGC reasons as required for various reasons. Overall these total harbor closures alone would reduce the availability of the inner harbor, including the Mystic River, for the Wynn-Everett FEIR water ferry route by at least 20% from the unrestricted conditions assumption on which the FEIR ridership projections are based, which need to be adjusted downward accordingly.

The complete Title 33: CFR is attached.

In addition to these stringent harbor safety restrictions there are other maritime operational factors which are the basis of my skepticism of the Wynn-Everett water ridership claims.

The Wynn-Everett casino proposal is also seriously flawed by its failure to acknowledge the substantial safety and environmental consequences of the casino's close proximity to the massive Distrigas liquefied natural gas facility in Everett whose intrinsic safety deficiency is such that its closure was one of former Boston Mayor Thomas Menino's highest priorities. The Distrigas facility is the only facility of its kind located in the midst of a major urban population center.

A number of detailed and credible studies have been produced by highly reputable sources that demonstrate the enormous potential destruction associated with an LNG vapor cloud explosion from a breached LNGC vessel, stemming from either accidental or deliberate means. One scenario shows major damage over a mile from the source. Foremost among these studies is that of MIT Professor Emeritus James Fay whose groundbreaking 2004 analysis is the foundation of the subject. The Wynn-Everett casino would be located 4,000 ft. from an LNGC vessel moored at the Distrigas docks, and closer to the main LNG storage tanks. Please see attached aerial entitled: Wynn-LNG Distance.

Note in particular the Boston Globe graphic, based on a Sandia Laboratories study, showing that the proposed Wynn-Everett casino site lies well within the predicted 4,200 ft. radius within which people would be severely injured from an LNG explosion.

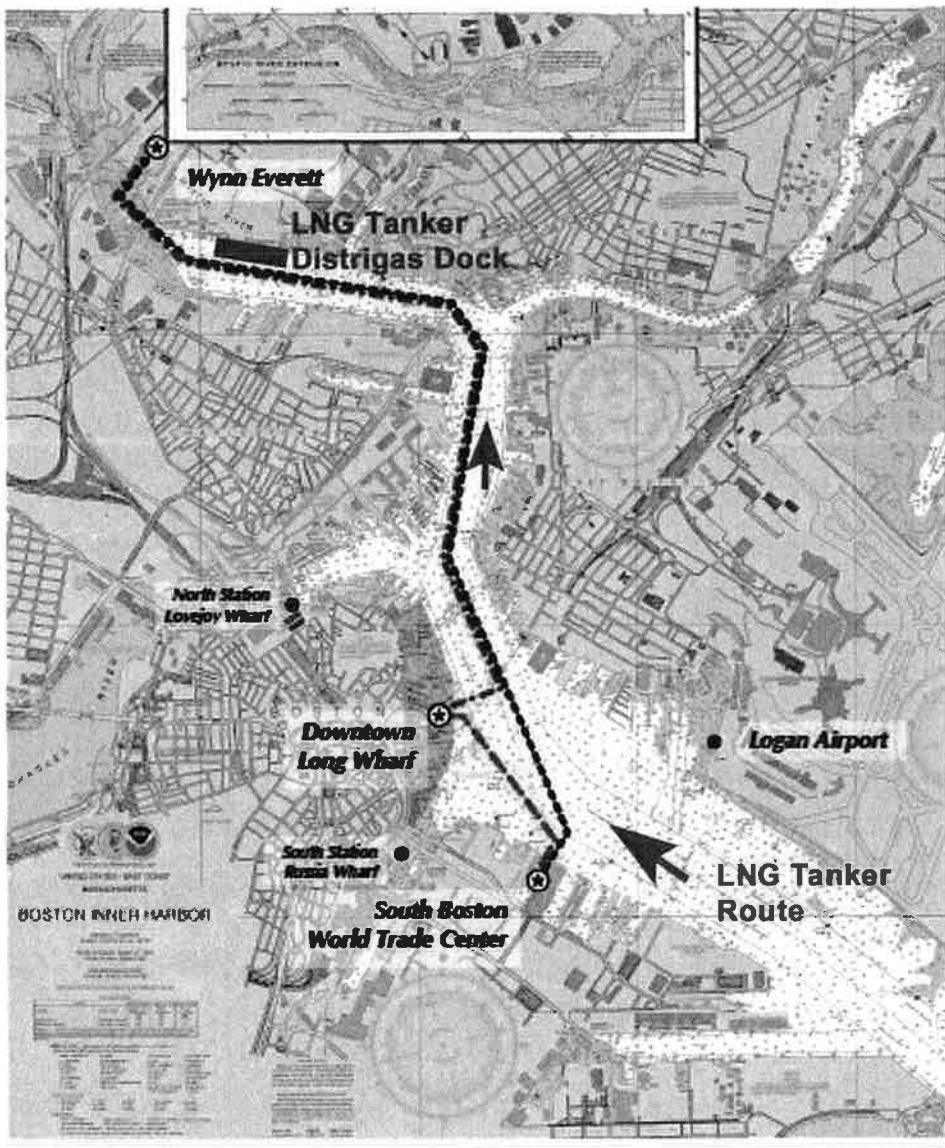
I've also attached a copy of a Boston Fire Department study that shows the limitations of the department in coping with a significant LNG event.

Also attached are various media accounts from Boston Magazine, NBC News, etc.

Also attached is a complete copy of the Sandia Laboratories study

Thank you,

*John Vitagliano*



Wynn Everett  
Everett, Massachusetts

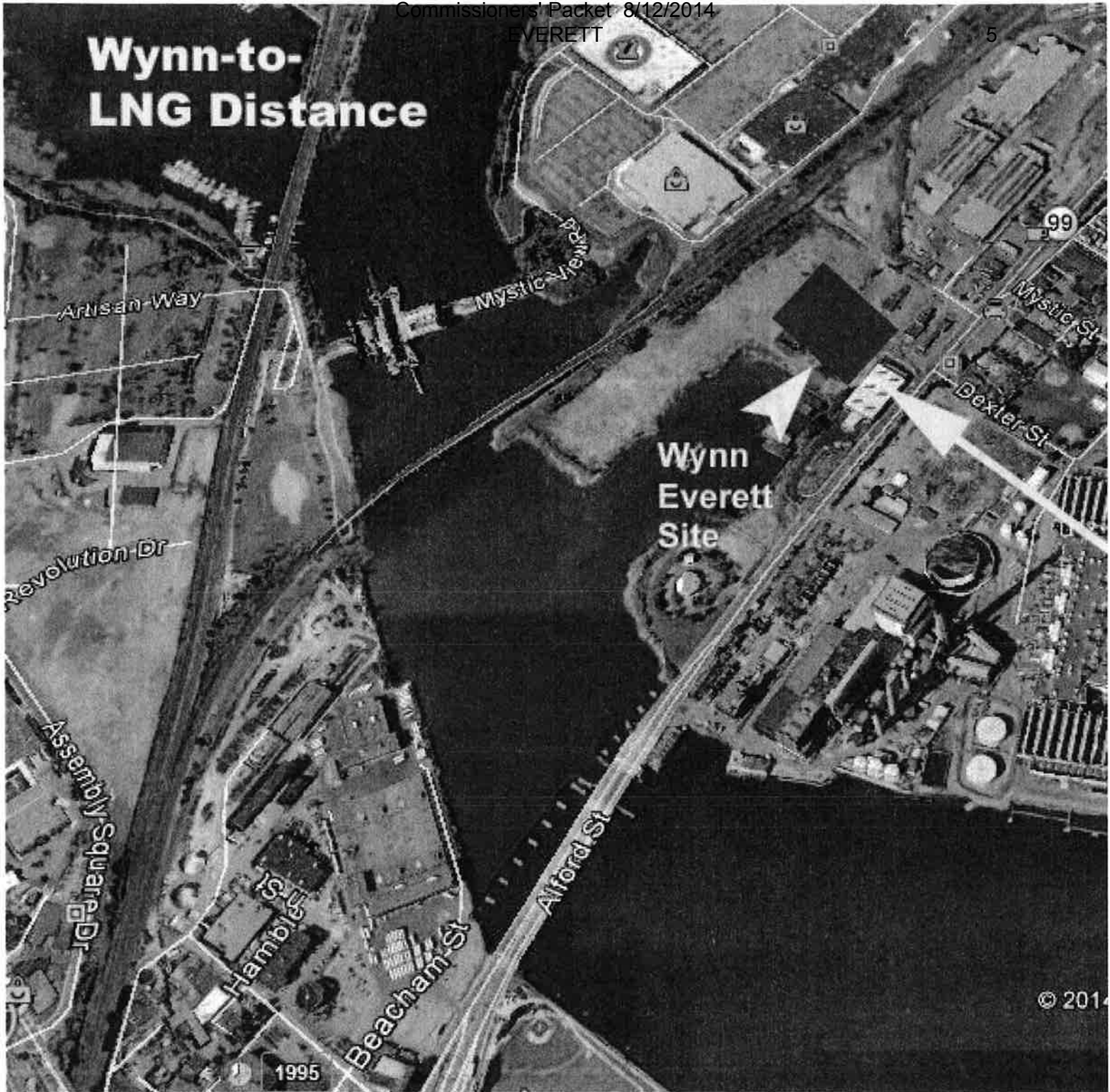
*20*

Figure 2-27

Proposed Passenger Ferry Route to Boston

Source: Norris & Norris Associates, 2013; Fort Point Associates, 2013

# Wynn-to-LNG Distance



**Bresilla, Colette (MGC)**

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**From:** gerald jeffkin <jjemgms@aol.com>  
**Sent:** Monday, August 11, 2014 12:26 PM  
**To:** MGCcomments (MGC)  
**Subject:** Please Support Wynn Plan

Dear Commissioners:

The Wynn Resorts project will provide numerous benefits for the people of Greater Boston.

There are a lot things to be said about Steve Wynn and the Everett casino plan - all the jobs and the taxes and other economic benefits, not to take away from those things at all - but the one that I'm most excited about is the way it will one, clean up the utter disaster that is that Monsanto site, and two, open up the waterfront for people to use and enjoy again. To think that visitors will be able to come to the Wynn by water taxi or their own boat, that we'll be able to walk by the river again, and to have such a beautiful complex there for the benefit of Everett, Somerville, Medford, Charlestown and all the visitors from Massachusetts and around the world, well, that's reason enough to support this plan 100%.

For these reasons (and more), I ask that you award the casino license to the Wynn Everett plan. It is time to get this facility built and open. Thank you for taking my recommendation under consideration.

Yours sincerely,

gerald jeffkin  
175 cottage st  
chelsea, MA 02150

**Bresilla, Colette (MGC)**

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**From:** Alfred.Carrier@ch2m.com  
**Sent:** Monday, August 11, 2014 5:19 PM  
**To:** MGCcomments (MGC)  
**Subject:** Wynn MA LLC - Public comments  
**Attachments:** charlestown\_ll\_wynn\_resorts\_public\_comments.docx

Dear Sir or Madam,

As a representative from Charlestown Little League will not be available to attend the public meeting tomorrow night we are respectfully submitting our comments via this email.

Thank you for this opportunity.

Al Carrier  
Vice President  
Charlestown Little League

EVERETT  
**Charlestown Little League**

Sharlene Cahill  
*President*  
Al Carrier  
*Vice President/*  
*Treasurer*  
Carolyn Settipani  
*Player Agent*  
Ed Greatorex  
*District Administrator*  
*District 9*



Bill Cantin  
*Safety and Player Development*  
Jason Gallagher  
*Minor League Commissioner*  
David Cahill  
*Major League Operations*  
*Treasurer*  
Sharlene Cahill  
*Concessions*

August 11, 2014

Massachusetts Gaming Commission

Re: Host Community Meeting – Public Comments

Dear Commission members,

The Board of Directors of Charlestown Little League would like to recognize Wynn Resorts for their commitment to being a good neighbor to one of the closest non-profit youth based organizations to their proposed facility. We were approached by Wynn Resorts a few months ago and they asked how they could help Charlestown Little League improve the program or the facility or both. After some dialogue and discussion with our Board members a number of program improvements were noted as being desperately needed but were not financially feasible for the program to undertake.

We are happy to announce that Wynn Resorts has agreed to provide financial support and volunteers for a number of facility improvements including a new scoreboard, replacement of safety fencing, installation of new bleachers for spectators, new picnic tables and trash cans and significant improvements to recondition our major league infield diamond. These are improvements that our program could never afford to undertake and would not be possible without outside financial assistance.

Our program serves well over 250 inner city youth and provides a safe and constructive environment within which we can help bring the great game of baseball to these kids. We are thrilled that Wynn Resorts has decided to provide financial support to Charlestown Little League as this will help to improve our facility and certainly enhance our program.

Sincerely,

Board of Directors  
Charlestown Little League



**Bresilla, Colette (MGC)**

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**From:** nancie mossman <artdoll@GMAIL.COM>  
**Sent:** Sunday, August 10, 2014 8:56 AM  
**To:** MGCcomments (MGC)  
**Subject:** Please Approve The Wynn In Everett

Dear Members of the Massachusetts Gaming Commission:

Good Day! I am a citizen of milton and I am writing this to share my support for, and opinion of, the Wynn Everett proposal. This would be so beneficial to this region of Massachusetts, far beyond what the other proposal can do. The Wynn proposal is the best and only choice.

The construction jobs from this development are important. But it is even more important for the gaming commission to weigh the long-term results of this major decision. Year after year, Wynn has been named the best casino resort employer in Las Vegas, where it has scores of competitors. The permanent jobs created by Wynn in Everett will be jobs Massachusetts resident really want and will enjoy. That is an important factor for you to take into account.

Respectfully, I urge you to support the Wynn proposal for all of its positive benefits. They can back everything they say to us and I know this is the smartest choice of all. Wynn has more money in his pockets than the other casino company, and people from all over the world will be traveling to his 5 star resort, ready to spend their money, money that will go to our cities and our state. Also the fact that these small businesses in the surrounding area will not be hurt by this attraction is huge. This is a deal that should not be passed up, so please support the Wynn! Thank You!

Yours sincerely,

nancie mossman  
895 randolph avenue  
milton, MA 02186

**Bresilla, Colette (MGC)**

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**From:** Michael Acquaviva <soxfan9224@aol.com>  
**Sent:** Saturday, August 09, 2014 8:53 AM  
**To:** MGCcomments (MGC)  
**Subject:** Wynn all the way!

Dear Commissioners:

Good Day! I am a citizen of Everett and I am writing this to share my support for, and opinion of, the Wynn Everett proposal. This would be so beneficial to this region of Massachusetts, far beyond what the other proposal can do. The Wynn proposal is the best and only choice.

The construction jobs from this development are important. But it is even more important for the gaming commission to weigh the long-term results of this major decision. Year after year, Wynn has been named the best casino resort employer in Las Vegas, where it has scores of competitors. The permanent jobs created by Wynn in Everett will be jobs Massachusetts resident really want and will enjoy. That is an important factor for you to take into account.

I hope you will make this transformative project a reality! We want the Wynn!

Yours sincerely,

Michael Acquaviva  
406 Ferry St.  
Everett, MA 02149

**Bresilla, Colette (MGC)**

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**From:** Joann GOODWIN <JHGood0@aol.com>  
**Sent:** Saturday, August 09, 2014 8:53 AM  
**To:** MGCcomments (MGC)  
**Subject:** I believe in Steve Wynn

Dear Members of the Massachusetts Gaming Commission:

I hope the gaming commission will consider all of the facts closely and approve the Everett plan by Wynn Resorts for a state casino license. Wynn's application to build a world-class resort in Everett is the best choice to benefit Massachusetts - by far.

The jobs that will be created by the Wynn project are just what this state needs. There will be 4,000 long-term jobs at the Wynn, well-known as the best jobs in that industry. With Wynn's expertise and track record in the business, surrounded by loyal employees who want to go the extra mile for his customers, and with over \$2 billion dollars in the bank, his promises to deliver are completely backed up, in my opinion. To my mind, there is no other option than the Wynn. The Wynn puts the other guys to shame. This is exactly what Massachusetts needs!

Please approve the Wynn! Thank you for your consideration of this important matter.

Yours sincerely,

Joann GOODWIN  
33 Lynn Street  
Everett, MA 02149

**Bresilla, Colette (MGC)**

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**From:** geraldine Mclaughlin <dee1124542@msn.com>  
**Sent:** Saturday, August 09, 2014 2:22 PM  
**To:** MGCcomments (MGC)  
**Subject:** Wynn all the way!

Dear Commissioners:

I am writing to respectfully urge the gaming commissioners to approve the Wynn Everett application for the casino license in the Boston region. The Everett location and the Wynn plan are clearly superior.

The Wynn Everett will create 4,000 long-term jobs in this region of Massachusetts, jobs where people will be working directly at the Wynn. These jobs are well known as being the best jobs in the industry due to the fact that Wynn genuinely cares about his employees' well-being and job security. It couldn't be any clearer than that, considering how he, along with his executives, took pay cuts during rough times so that his employees would still have work. During that time Wynn's casinos actually made the industry's leading profits due to his smart business choices. I don't know what person wouldn't agree with backing this proposal 100%. This is the exact kind of employer Massachusetts should be looking to bring on board.

I hope you will make this transformative project a reality! We want the Wynn!

Yours sincerely,

geraldine Mclaughlin  
50bromfield rd.  
somerville, MA 02144

**Bresilla, Colette (MGC)**

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**From:** margaret mitton <margaret.mitton@yahoo.com>  
**Sent:** Saturday, August 09, 2014 2:22 PM  
**To:** MGCcomments (MGC)  
**Subject:** I support Wynn

Dear Members of the Massachusetts Gaming Commission:

I am writing to you as a resident of everett to urge your support of the Wynn Resorts project.

The Wynn plan is without doubt the superior choice. The resort in Everett will have a five-star hotel and world-famous retailers, unlike the other application before you. These factors are huge in ensuring that the Boston region casino you approve is successful - and Massachusetts residents cannot risk that this is not major success. Wynn is clearly the right choice for our state.

I hope I can count on your support. Thank you for your consideration.

Yours sincerely,

margaret mitton  
31 summit ave  
everett, MA 02149

**Bresilla, Colette (MGC)**

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**From:** Courtney Graziano <courtney.graziano@gmail.com>  
**Sent:** Thursday, August 07, 2014 11:50 AM  
**To:** MGCcomments (MGC)  
**Subject:** I support Wynn

Dear Commissioners:

As the Gaming Commission prepares to make its decision on awarding the state casino license for the Boston area, I wish to express my strong support for the Everett plan and respected resort operator Steve Wynn.

This project would place Wynn Resorts among the Top 5 private employers in Boston. Moreover, this project would generate \$267 million in annual, recurring and local taxes. It also would provide \$183 million in one-time state and local taxes during the resort development.

Respectfully, I urge you to support the Wynn proposal for all of its positive benefits. They can back everything they say to us and I know this is the smartest choice of all. Wynn has more money in his pockets than the other casino company, and people from all over the world will be traveling to his 5 star resort, ready to spend their money, money that will go to our cities and our state. Also the fact that these small businesses in the surrounding area will not be hurt by this attraction is huge. This is a deal that should not be passed up, so please support the Wynn! Thank You!

Yours sincerely,

Courtney Graziano  
8814 Jackdaw St  
Littleton, CO 80126



SMART GROWTH AND REGIONAL COLLABORATION

**MEMORANDUM**

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

**TO: MASSACHUSETTS GAMING COMMISSION**

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

**DATE: AUGUST 6, 2014**

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

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

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

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

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

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

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

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

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

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

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

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

We wish to emphasize that land use and transportation impacts are not minor and ancillary issues in approving a major development proposal; rather, they will have significant effects on the users of the facility, the Host and Surrounding Communities, the residents of those cities and towns, local businesses, and people who travel into or through those communities.

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

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



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

**Impact #1: Traffic congestion. Advantage: Mohegan Sun**

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

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

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

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

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

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

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

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

**Impact #2: Public transportation. Advantage: Mohegan Sun**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

##### *Local Business Expenditures*

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

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

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

##### *Local and Minority Hiring*

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

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

#### *Workforce Development*

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

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

#### *Ancillary Development*

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

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

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

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

#### *Community Benefits*

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

#### **Impact #6: Environmental impacts. Advantage: Wynn**

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

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

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

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

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

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

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

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

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

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

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

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

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

### ***Public Safety and Gambling***

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

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

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

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

### ***Housing***

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

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



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

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

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

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

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

#### ***Public Transportation***

MAPC believes strongly that transportation impact mitigation should not be limited solely to roadways. Each casino proposal has a public transportation component as part of their site design, which will result in increased demand on MBTA service. While the proponents have conducted analyses that indicate MBTA service will not significantly exceed capacity, that is hardly an assurance of optimal performance. MAPC believes these services will be strained by the substantial addition of new passengers, especially at peak times. To off-set this impact, each proponent should partner with the MBTA by contributing to the both the operating and maintenance costs of area bus and subway lines in amounts that are reasonably related to the additional demand of the project.

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

#### ***Roadway Improvements***

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

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

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

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

Since the Wynn site has less advantageous direct transit access, Wynn should also include improvements to facilities for bus service as part of their existing commitments to the Route 99 corridor. Route 99 provides access to the project site, downtown Boston, and the interstate highway system. The Route 99 corridor also provides a significant amount of bus service. On an average weekday, over 2,900 passengers board MBTA buses at stops along Route 99, accounting for about 61% of total bus boardings in Everett alone. Even though Wynn does propose to widen the roadway to add more auto capacity and enhance bus stops near the project site, additional roadway design changes are needed to improve bus service along this corridor. The proponent should add design elements that include signal priority for buses, dedicated bus lanes, mixed-flow lanes with queue jumps, enhanced bus shelters, real-time message boards, and other bus rapid transit features that will improve bus service.

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

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

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

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

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

**Wynn**

After a four-year planning process with significant public input, the City of Boston has adopted a transportation and redevelopment vision for the Sullivan Square/Rutherford Avenue part of Charlestown which involves scaling down traffic along Rutherford Avenue so that it becomes less of a highway and more of an urban boulevard, with dedicated bicycle and pedestrian paths adjacent to the roadway. Additionally, Sullivan Square itself will be redesigned as a gridded street network facilitating new development oriented to the Sullivan Square MBTA station. Similar to Rutherford Avenue, the goal is for an area with less auto traffic and more walking, biking, and transit use. These plans call for new residential and commercial development that will provide much needed housing, add jobs to bolster the economy, and take advantage of the proximity of the MBTA station to encourage residents and workers to use transit rather than drive to all of their destinations.

This effort to create a “new neighborhood” in the City of Boston is highly consistent with the Commonwealth’s Sustainable Development Principles, the regional plan *MetroFuture*, and MassDOT’s mode-shift goals and GreenDOT programs.

Unfortunately, the traffic impacts projected for the Wynn site would seriously damage this vision for Sullivan Square and Rutherford Avenue, because the vast majority of traffic to and from the site will utilize this corridor. To date, a comprehensive mitigation program has not been determined, and it is not clear that such mitigation is even practical. MAPC does acknowledge that Wynn’s BAFO to Boston includes a \$15 million contribution to implement transportation infrastructure improvements for Sullivan Square (\$1 million per year over 15 years). This contribution is in addition to the \$5 million in improvements it will make per MEPA requirements. However, as of this writing, an agreement has not been formalized between Wynn and the City of Boston.

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

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

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

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

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

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

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

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

### ***Mohegan Sun***

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

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

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

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

### **Conclusion**

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

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

**Bresilla, Colette (MGC)**

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**From:** Scott Brown <sebandvak95@hotmail.com>  
**Sent:** Wednesday, August 06, 2014 1:46 PM  
**To:** MGCcomments (MGC)  
**Subject:** WE WANT WYNN!

Dear Commissioners:

The Wynn Resorts project will provide numerous benefits for the people of Greater Boston.

There are a lot things to be said about Steve Wynn and the Everett casino plan - all the jobs and the taxes and other economic benefits, not to take away from those things at all - but the one that I'm most excited about is the way it will one, clean up the utter disaster that is that Monsanto site, and two, open up the waterfront for people to use and enjoy again. To think that visitors will be able to come to the Wynn by water taxi or their own boat, that we'll be able to walk by the river again, and to have such a beautiful complex there for the benefit of Everett, Somerville, Medford, Charlestown and all the visitors from Massachusetts and around the world, well, that's reason enough to support this plan 100%.

Thank you for reading my message. I respectfully submit that when you evaluate all aspects of the competing applications, the choice is not even close. Please award the important Boston Region casino license to Wynn Everett.

Yours sincerely,

Scott Brown  
2012 S. Stoney point Lane  
Wichita, KS 67209

**Bresilla, Colette (MGC)**

---

**From:** Dan O'Reilly <bsc7276@yahoo.com>  
**Sent:** Wednesday, August 06, 2014 1:46 PM  
**To:** MGCcomments (MGC)  
**Subject:** Wynn all the way!

Dear Commissioners Crosby, Cameron, McHugh, Zuniga & Stebbins:

Hello! My name is Dan O'Reilly and I would like to tell you that I am in full support of the Wynn Everett proposal. The project will benefit all of Massachusetts in much greater ways than what the other proposal can do. From my point of view, it's simple: Wynn's proposal is the only real choice for the people of Massachusetts.

There are a lot things to be said about Steve Wynn and the Everett casino plan - all the jobs and the taxes and other economic benefits, not to take away from those things at all - but the one that I'm most excited about is the way it will one, clean up the utter disaster that is that Monsanto site, and two, open up the waterfront for people to use and enjoy again. To think that visitors will be able to come to the Wynn by water taxi or their own boat, that we'll be able to walk by the river again, and to have such a beautiful complex there for the benefit of Everett, Somerville, Medford, Charlestown and all the visitors from Massachusetts and around the world, well, that's reason enough to support this plan 100%.

In closing, I simply ask that you take into account not only the fine reputation and financial strength of Wynn, but Steve Wynn's ability and commitment to get the Everett resort built and open without endless delays. Please approve the best plan and best operator when making this major decision for our state.

Yours sincerely,

Dan O'Reilly  
PO Box 124  
Marshfield, MA 02050

**Bresilla, Colette (MGC)**

---

**From:** Vinh Nguyen <vinhnguyenq@gmail.com>  
**Sent:** Tuesday, August 05, 2014 2:43 PM  
**To:** MGCcomments (MGC)  
**Subject:** Voice from an average Joe

Dear Commissioner Stephen P. Crosby:

I'm an average Joe who has a deep root in the state. I do currently live in Everett but that not the reason I urge you to consider Wynn Resort application for the bid to build its 5-start resort in Everett, rather my reasons are more for the benefits of the Commonwealth and its tax-paying citizens and everyone else that live in the state. I'm no financial guru but the math shows that Wynn's proposal makes the most sense for us. Here are the highlights:

- \* Toxic land to be cleaned up without using the tax payer's money, which can better used for other projects to help improve the quality of life for the state's citizen. I can't imagine we want to pay \$50 million to clean up the toxic and possible million more to beautify or make the land usable.
- \* Wynn's balance sheet shows strong performance in the last 5 years. I can't imagine the state doesn't want to do business with a reputable and better (if not best) operator in the industry.

I apologize for my broken English, but this is what came out of my heart and my consciousness encourage me to write this to you. Once again, with the power of my consciences, I urge you to award the license to Wynn Resort.

Sincerely Yours,

Vinh Nguyen Q., M.S.  
[Vinhnguyenq@gmail.com](mailto:Vinhnguyenq@gmail.com)  
Cell: 617-259-0478





*Charlestown Waterfront Coalition  
P.O. Box 290533  
Charlestown, Massachusetts 02129*

Maeve Valleley Bartlett  
Secretary, EOEEA  
100 Cambridge Street  
Boston, MA 02108

Attention: Ann Canaday

EEA# 15060

August 5th, 2014

Dear Madam Secretary:

The Charlestown Waterfront Coalition is a community based advocacy organization whose mission is to protect and enhance the Charlestown waterfront including the Mystic and Charles Rivers and the Harbor shore. As such, we have been an important voice in many shoreline development projects. Over the years, as development opportunities in the Navy Yard were fulfilled and the build out completed, we turned our attention to the two rivers. CWC has participated for years in the Charles River Basin Advisory Committee meetings and is a charter member of EPA's Mystic River Watershed Steering Committee.

CWC has serious concerns about the Wynn Massachusetts FEIR, particularly in three areas: the absence of detailed plans for site remediation and construction management, and in regard to insufficient traffic analysis. Remediation and build activities will seriously impact Charlestown and air quality, noise and traffic flows, as excavation materials must go out of state, and supplies and materials must come in from disparate sources, many presumably on Rt. 93.

Furthermore, these activities will affect both the air and water quality on and in the Mystic River, a river long neglected by state and local environmental activism.

Wynn forecasts dredging 12,700 CY for the proposed marina, 1300 CY for the proposed living shoreline, and 2300 CY of clean fill coming in for the area below the MHW line. That work will all be done within 2/15 and 9/30 so as not to interfere with spawning fish.

Wynn's FEIR also anticipates digging to 35 to 40 feet for garage construction which has been expanded under the restaurant and retail section, requiring 765,000 CY to be removed for the entire construction. The FEIR indicates remediation will take 6 months, with additional contamination to be removed during construction of site roadways, landscape improvements and during the installation of new utilities. Clean up will cost between 14 and 20 million dollars, and will include a Licensed Site Professional.

Construction is to begin in late 2014, and be completed in 2017, predicted to be a 30-month duration. The waterfront work has no timeline, while the casino and resort are anticipated to take 16 to 24 months, with the possibility of on site material crushing. The Wynn team will notify local authorities and DEP if this crushing is required.

The FEIR states "Information regarding construction conditions and impact mitigation will be distributed to project site abutters," but not to Charlestown. In addition, there will be no public participation process under Chapter 21 E, unlike Charlestown's experience with Harborview Apartments' clean up of Parcel 4, and Spaulding Rehabilitation Hospital's clean up of Parcel 6, both in the Charlestown Navy Yard. Spaulding's clean up also took 6 months, requiring constant truck traffic on Chelsea Street. CWC believes the absence of a public process is a major shortcoming in the FEIR and illustrates graphically Wynn's failure to recognize his responsibility to this surrounding community.

Curiously, the FEIR recognizes that increased noise of approximately 35 decibels during construction will impact Charlestown, but the FEIR has no acknowledgement that the prevailing wind in the area is out of the northwest, and that particulates will be air born over the Mystic River and into Charlestown, affecting air and water quality. In addition, there is no discussion on trucking or Mystic River based barge routes to be taken to transport soil from the site to accredited disposal sites.

The FEIR storm water quality analysis states only "storm water runoff will be carefully managed during construction in accordance with state and federal regulations." There is no discussion of how the dredging for the marina or the remediation removal will impact Mystic River water quality.

And finally, the air quality analysis comes up equally short. The FEIR states, "the air quality impacts from the operation of the project subsequent to completion of construction will be limited to operational emissions" for generating heat and hot water. It states further that "increased vehicular traffic volume will slightly increase regional emissions of motor pollutants" due to project mitigation of impacts with improved signalization and an aggressive TDM program. Any analysis of remediation and construction impact on air quality is missing.

CWC considers the absence of air and water quality analysis on remediation strategies and construction management to be a critical shortcoming. Charlestown

and the river are south east of the Monsanto site and with the prevailing wind coming out of the northwest, will be the recipient of air born releases. CWC requests that the Secretary withhold the award of a certificate, and require Wynn to submit a supplemental EIR with a detailed analysis of air and water quality during marina & shore restoration activities, and remediation and construction.

In summary, we urge the Secretary to require a Supplemental EIR to address the shortcomings outlined above. The current submission's inadequacy is substantial, and an affront to our common sense.

Sincerely,

Pamela Daly

Maureen Donovan

Guy Maccarone

Ivey St John

Bruce Swanton

Paul Sullivan

Jean Tochterman

Jean Wilson

CWC Steering Committee

CC

John Ziemba, Massachusetts Gaming Commission



Commissioner James McHugh  
Commissioner Gayle Cameron  
Commissioner Bruce Stebbins  
Commissioner Enrique Zuniga  
Commissioner Rick Day, Executive Director  
Ombudsman John Ziemba

Dear Madam & Sirs:

August 4th, 2014

During the last three years, RCIC members have been active participants in the Boston Transportation Department's five year Redesign Study of Rutherford Avenue and Sullivan Square. When Congressman Capuano halted the Redesign implementation because of his concern that enough Charlestown residents were informed about the Redesign Plan, RCIC members coordinated and lead an 18 month effort to educate a broad spectrum of Charlestown residents about the details of the Plan in small, geographically dispersed meetings.

In the end, the Congressman agreed with those involved that, indeed, many in Charlestown were informed and there were significant numbers in favor of the Plan. In fact, 600 Charlestown residents signed on to support the Redesign Plan on the RCIC website, and on Monday, July 14<sup>th</sup> those six hundred names were given to Mayor Walsh. Of those original 600 from December, 2012, 400 emails remain active and are regularly used to update on the Redesign status, and issues resulting from the Wynn Massachusetts license application.

Sullivan Square's seriously overburdened, dangerous and deteriorated condition necessitated a rebuild of the Sullivan Square interchange. Hence the BTM lead community process to develop a new design not only for Sullivan Square, but including all of Rutherford Avenue. Now that Redesign is threatened by the Wynn Massachusetts proposal for a resort casino license award.

RCIC members were anticipating a more forthcoming FEIR from Wynn, one with considerably more reporting on their marketing program and trip generation numbers. Their absence makes evaluation of Wynn proposals very frustrating. As an example, Wynn's FEIR Figures 4-140 and 4-141 for year 2023 show just fewer than 1000 incremental vehicle trips on Friday afternoons between 4:30 and 6:00PM moving through Sullivan Square's two-lane corner where Cambridge Street, Maffa Way and Rutherford Avenue converge. The FEIR details these numbers as typical of evening rush hour conditions.

We are deeply concerned that Wynn's traffic analysis of the current SS configuration is superficial, as it does not provide data on the Wynn traffic entering SS from Main, Bunker Hill and Medford Streets. Traffic, like water, takes the easiest route, and Wynn traffic will search for alternative routes through Charlestown.

The Sullivan Square circle at the Cambridge Street, Maffa Way and Rutherford merge currently operates at near LOS F. The thousand additional vehicles, including those not accounted for in the Wynn analysis, will exacerbate existing conditions, reconstruction of Cambridge Street, new traffic lights and signalization notwithstanding.

The Wynn FEIR proposes the modest vehicle count at Sullivan Square by reductions resulting from a combination of water transportation, premium park and ride busses, an aggressive shuttle program, and regular use of Orange Line and MBTA bus route resources. Wynn promises a well-managed Transportation Demand Management Program, and regular monitoring of its effectiveness. However, the FEIR lacks enough marketing and trip generation data to evaluate whether Wynn's projected 29% off load is realistic.

Although currently on hold, the Redesign Plan is innovative and visionary, and could handle the additional Wynn traffic, including anything not calculated in their FEIR exhibits. This is presuming Wynn vehicle generation numbers are indeed realized through an effective and active TDM Program. Should the numbers prove understated,

or if the TDM Program is not implemented, marketed or managed well, it will be imperative to build to the Redesign Plan in order to create a roadway system which can provide travelers with alternative pathways, and thus disperse vehicles to disparate routes around SS pressure points.

The FEIR promises “the proponent will continue to work with the City of Boston to help advance a long term vision for Sullivan Square and Rutherford Avenue that will improve safety and functionality.” The long-term vision is in place and it is the RA/SS Redesign. The reconstruction of Rutherford Avenue and Sullivan Square will assure Charlestown of its long-term goal of a safe, family oriented neighborhood without artificial barriers created by traffic queues and congestion.

Wynn’s representative has testified before the Commission, applauding Wynn’s financial resources and financing plan. The Wynn Resort Casino is over three million square feet, and anticipates a very successful and profitable enterprise. Other casino proponents have agreed to sufficient surrounding community agreements with other communities, and we believe Wynn should be held to the same standard.

We urge the Commission to require Wynn Massachusetts to provide the equivalent to the City to support the full reconstruction of Sullivan Square and the narrowing of Rutherford Avenue. The Rutherford Avenue/Sullivan Square Redesign Plan, once implemented, perhaps with minor modifications, will handle Wynn’s incremental traffic and allow for an exciting redevelopment of Sullivan Square into a mixed-use neighborhood based on the Community’s visioning effort conducted by the BRA in 2013. However, we also urge the Commission to put in place oversight measures to insure long-term accountability for the traffic impact on Charlestown and other surrounding communities.

We urge the Commission to require Wynn to fund a major portion of the Redesign construction and allow Charlestown to enhance its safety and environment, while safely accommodating the Wynn impact.

We thank you for your careful consideration.

Sincerely,

Nathan Blanchet          Gerald Robbins    Karen Dean-Smith      Carl Blesius      William Lamb  
   Jay Konieczka          Nicolas Kraman          &          Ivey St John

Cc

Mayor Marty Walsh, City of Boston  
State Representative Dan Ryan  
City Councilor Sal LaMattina  
Maue Valley Bartlett, MEPA  
Marc Draisen, MAPC  
Anthony Gallager, City of Boston  
Vineet Gupta, City of Boston  
Allison Felix, MAPC



## Design Review

John Benson  
Peggy Bradley  
Jack Glassman  
Dan Kovacevic  
Nick Kraman  
Bill Lamb  
Mark Spaulding  
Annette Tecce

Charlestown Preservation Society Design Review Committee  
P. O. Box 290201  
Charlestown, MA 02129

Maeve Valley Bartlett, Secretary, EOEEA  
Attn: MEPA Office  
100 Cambridge Street, Suite 900  
Boston, MA 02114

James McHugh, Commissioner  
Gayle Cameron, Commissioner  
Bruce Stebbins, Commissioner  
Enrique Zuniga, Commissioner  
Rick Day, Executive Director

Massachusetts Gaming Commission  
84 State Street, 10th Floor  
Boston MA 02109

**Re: EOEEA # 15060 - Wynn Everett FEIR**

4 August 2014

### COMMENTS ON THE WYNN EVERETT, JUNE 30, 2014 FEIR

Dear Secretary and Commissioners:

The Charlestown Preservation Society Design Review Committee (CPSDRC) appreciates this opportunity to comment on the Wynn Everett, June 30 2014 FEIR.

We believe that the traffic plans presented in the FEIR for the mitigated I-93N off-ramp and Cambridge Street/Maffa Way intersections leading into the existing badly functioning Sullivan Square traffic rotary present an inadequate traffic solution for Rutherford Avenue/Sullivan Square for the following reasons:

- The 2014 FEIR assumes that the long planned roadway reconfiguration designed to serve the development of a new pedestrian friendly smart growth community in Sullivan Square will not be implemented by the time the Wynn casino is opened. In accordance with an EOEEA request, we have been told, the drawings and analysis in the earlier DEIR that included the Sullivan Square redesign were dropped from the FEIR. The FEIR now retains the existing traffic rotary in all its traffic projections, a completely unsatisfactory solution to Charlestown's traffic problems.

CPSDRC comments on EOEEA #15060

- In response to a comment by the Charlestown Neighborhood Council, the FEIR (page 15-139) says that "The proponent is committed to working with the neighborhood and the City of Boston to mitigate potential traffic impacts and will participate in the development of plans to improve Sullivan Square". If the proponent is truly committed to this, why has he altered the DEIR so that the FEIR makes no recognition of the plans for the Sullivan Square area redesign which have been honed by the City and the neighborhood in a multi-year process? On the contrary, this change indicates that this statement by the proponent is not in good faith and that its expressed commitment cannot be expected to be sincere or effective.

We ask that the EOEEA decide that this Final Environmental Impact Report is inadequate for the licensing of the Wynn Everett Casino.

Sincerely,



Rutherford Avenue/Sullivan Square Advocacy Group  
P.O. Box 029533  
Charlestown, Massachusetts

Commissioner James McHugh  
Commissioner Gayle Cameron  
Commissioner Bruce Stebbins  
Commissioner Enrique Zuniga  
Commissioner Rick Day, Executive Director  
Ombudsman John Ziemba

Dear Madam & Sirs:

August 4th, 2014

The RA/SS Advocacy Group of 53 members is an ad hoc assemblage which first gathered in December, 2013 with the Menino administration's legal staff to gain an understanding of the City's activities in regard to the proposed casinos, and to improve the communication flow between the City and the Charlestown community. Since its first meeting, the RA/SS Advocacy Group steering committee has scheduled additional meetings, provided updates, reports and information on casino issues.

At the June Commission hearing in Everett, the RA/SS Group expressed frustration regarding limited analysis and information from the Wynn Massachusetts team. Despite five separate meetings, Charlestown residents and businesses lack comprehensive information about the full traffic impact on all of Charlestown's streets, both shortly after opening, and in the longer term. We are particularly surprised and disappointed that Wynn's FEIR does not present analysis on traffic impact on the RA/SS Redesign, and does not recognize that casino traffic will seek out alternative routes on Main, Bunker Hill, Medford and Chelsea Streets.

In addition, the Wynn FEIR does not provide a work around for the current failing corner at SS where Cambridge Street, Maffa Way, and Rutherford Avenue merge and meet Main Street. That corner at peak times is presently close to an LOS F, and the proposed short-term mitigation by Wynn does not adequately document how that corner can be improved or modified. Moreover, the Transportation Demand Management Program proposes a 29% reduction in vehicle trips. Yet, the FEIR provides no detailed mechanism to evaluate whether or not Wynn achieves its transportation demand management objectives.

Therefore, the RA/SS Advocacy Group urges the Commission to require Wynn:

To analyze the casino impacts as if the RA/SS Redesign plan were in place

To make a major contribution to the construction of the RA/SS Redesign

To considerably strengthen the monitoring and enforcement of the Transportation Demand Management Program, to include the requirement to engage annually a consultant to provide a comprehensive and thorough analysis of Wynn's marketing strategy and its likely impact on trip generation, including projected modal split among casino, hotel, and retail, and to evaluate whether or not Wynn is meeting its objectives.



To make the examination results public, and in the event that objectives are not met, Wynn should be required to provide additional funding for the RA/SS Redesign. Any modifications to that Redesign must be carried out in concert with Boston Transportation and the Charlestown community.

The Advocacy Group was formed to protect Charlestown, and to maintain a safe and livable environment for residents and businesses. The community has spent the better part of ten years creating a blueprint to reclaim Rutherford Avenue and Sullivan Square as community streets from their roles as regional transportation corridors. The Group has consistently worked to protect Charlestown, and to safeguard family safety and the quality of our environment from the creation of traffic barriers and congestion.

We urge the Commission to hold Wynn Massachusetts accountable for the recognition of and necessary mitigation for its impact and to adequately fund an effective reconstruction of Rutherford Avenue and Sullivan Square.

Thank you for your consideration,

Evelyn Addante

William Lamb  
Jennifer Rossi

Elizabeth Levin  
Ivey St John

Marc Older

Cc

Mayor Marty Walsh, City of Boston  
State Representative Dan Ryan  
City Councilor Sal LaMattina  
Maive Valley Bartlett, MEPA  
Marc Draisen, MAPC  
Anthony Gallager, City of Boston  
Vineet Gupta, City of Boston  
Allison Felix, MAPC

Evelyn Y. Addante  
54 Baldwin St.  
Charlestown, MA 02129  
617 242-5335

August 4, 2014

Executive Director Rick Day  
Commissioner Gayle Cameron  
Commissioner James McHugh  
Commissioner Bruce Stebbins  
Commissioner Enrique Zuniga  
Ombudsman John Ziemba

Re: Wynn Everett Casino

Dear Commissioners:

I have been living on Baldwin Street in Charlestown for 22 years and travel through Sullivan Square on a daily basis. The Sullivan Square rotary is one of only two critical gateways to the Charlestown community, essentially making the community an 'island'. On an average week, the access roads of Rutherford Ave., Main St., and Bunker Hill St. leading to Sullivan Sq. from the community are routinely congested with vehicles and queues that severely limit residents mobility. The Wynn casino development will increase the number of vehicles using Sullivan Sq. and add to an already congested roadway system.

As stated in the Wynn Everett FEIR, EOEEA #15060, the proponent has committed to a transportation demand management program with the goal of 29% of casino patron trips by alternative transportation modes in order to reduce the impact of traffic on local roads serving the Charlestown community. This goal is optimistic and if it is not achieved there will be significant impacts on the operation of the Sullivan Sq. rotary and the mobility of Charlestown residents. In the FEIR discussion of the data collection program (4.17.1), there is no detail about how the mode share goal will be measured except to say that it will be measured annually (page 4-133). The following points outline a methodology for ensuring the stated goal is measured at appropriate intervals and that traffic mitigation efforts are supported by the proponent should these goals not be met.

1. The transportation demand management (TDM) program proposed by the Wynn casino project has a target goal of no more than 71% patron trips by automobile/taxi and 29% of patron trips by alternative transportation. This goal should be achieved by the end of three years of casino operation.
2. Measurement of the mode choices of casino patrons should be completed by a survey to be conducted by an independent market research company. The minimum sample size should be such that the mode choices of average daily and peak daily casino patrons (both gaming and non-gaming) can be measured with reasonable accuracy. Additional data to be collected via this survey should include the starting point of the local access trip of casino patrons at the zip code

Evelyn Y. Addante  
54 Baldwin St.  
Charlestown, MA 02129  
617 242-5335

level of aggregation, residence location of casino patrons, demographic data (age, gender, education, auto ownership, income, etc.), and other such information needed for transportation management planning purposes.

3. The casino patron survey proposed in this letter should be conducted at a minimum of every 3 years, the first of which will be completed and published within 6 months of the 3 year milestone of the casino's operation. This survey is in addition to the annual travel mode measurement proposed in the FEIR, page 4-133.

4. The results will be published and the data made publicly available from the casino web site.

5. If the stated goal of 29% alternative transportation is not met at the end of three years, then the proponent will provide a significant contribution towards Sullivan Sq. infrastructure improvements to mitigate the increased traffic congestion caused by the operation of the casino.

6. Thereafter, for each year the alternative transportation goal is not met, the proponent will provide the city with the additional funds necessary for policing, and other traffic mitigation elements to ease the impact of congestion on Charlestown until such time longer term improvements to Sullivan Sq. can be completed. The congestion payment will decrease in proportion to the increase in advancement towards the 29% alternative transportation goal.

Thank you for the opportunity to present this information to you.

Sincerely,



Evelyn Y. Addante

**Bresilla, Colette (MGC)**

---

**From:** charles mason <lmcm58@comcast.net>  
**Sent:** Monday, August 04, 2014 12:11 PM  
**To:** MGCcomments (MGC)  
**Subject:** I support the Wynn Everett

Dear Commissioners:

I am writing to you as a resident of everett to urge your support of the Wynn Resorts project.

The jobs that will be created by the Wynn project are just what this state needs. There will be 4,000 long-term jobs at the Wynn, well-known as the best jobs in that industry. With Wynn's expertise and track record in the business, surrounded by loyal employees who want to go the extra mile for his customers, and with over \$2 billion dollars in the bank, his promises to deliver are completely backed up, in my opinion. To my mind, there is no other option than the Wynn. The Wynn puts the other guys to shame. This is exactly what Massachusetts needs!

Therefore, I respectfully urge your favorable consideration of this project. Thank you for your attention to this matter.

Yours sincerely,

charles mason  
155 belmont st  
everett, MA 02149

**Bresilla, Colette (MGC)**

---

**From:** Thomas Gioia <tag4winds@gmail.com>  
**Sent:** Monday, August 04, 2014 12:11 PM  
**To:** MGCcomments (MGC)  
**Subject:** Please Support Wynn Plan

Dear Members of the Massachusetts Gaming Commission:

As the Gaming Commission prepares to make its decision on awarding the state casino license for the Boston area, I wish to express my strong support for the Everett plan and respected resort operator Steve Wynn.

This project would place Wynn Resorts among the Top 5 private employers in Boston. Moreover, this project would generate \$267 million in annual, recurring and local taxes. It also would provide \$183 million in one-time state and local taxes during the resort development.

I hope I can count on your support. Thank you for your consideration.

Yours sincerely,

Thomas Gioia  
16 Summer Avenue  
Malden, MA 02148

107 Swan Street  
Everett, Massachusetts 02149

July 31, 2014

Mr. Richard K. Sullivan Jr.  
Secretary  
Executive Office of Energy and Environmental Affairs



Dear Mr. Sullivan Jr.,

Everett's high-density population over 11,000 people per square mile in a 4-mile radius is ranked 6<sup>th</sup> most in Massachusetts. In a recent study with the Housing Demand Projections for Metro Boston, urban growth demands housing to increase over the next 20 years. The demand will directly impact traffic volumes immensely throughout the suburban areas. I am writing with regards to inquire Wynn Everett's traffic control plan as a serious solution. Given the close proximity of Everett to Boston, Wynn's traffic mitigation proposal plays a vital role in traffic fluidity.

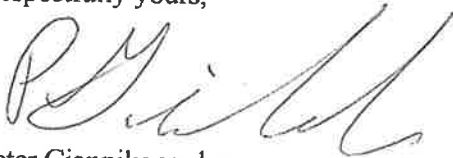
Being a resident of Everett for all of my 26 years, I see the negative impact traffic has on the people within this area. The constant traffic causes misery to those who revolve their time traveling in and out of Everett. The predominant residents who commute to work outside of Everett result in transporting through Lower Broadway and Santilli Circle. These two intersections to this date, without any improvements, are congested by the defected logistics of these infrastructures. To alleviate traffic, major transportation improvements need to be implemented not only within Everett, but Malden, Medford, and Somerville. In addition, Steve Wynn's traffic proposal will expedite existing traffic and impact future conditions by tenfold.

Wynn Everett plans to impact the roadway network by improving rail connections, increase MBTA subway connections, implement a state of the art water transportation, incorporate a park and ride system, engage pedestrians and cyclists with proper access, and manage transportation demands. Not only is Wynn Everett focused on Everett's access points, but also extending a hand to improve roadway points in adjacent cities that will demand high traffic volumes. Steve Wynn is going above and beyond by investing \$50 million of his own developing funds, exceeding all other developmental area expenditures by \$20 million. Conversely, the public will not bear any expenditure affects by using their tax-earned dollars.

Steve Wynn's holistic, multi-modal approach analyzed intersections of 57 locations ranging within 7 cities. The comprehensive report highlights preferred and alternative access points to intersections that will mitigate all impacts by the on-going refinements of the plan. To ensure a transparent plan, Wynn Everett has outlined each impact point with exhaustive analysis. I highly recommend reviewing the intricate plan Wynn Everett has proposed, installing such project with no room for error.

As the Secretary Executive Office of Energy and Environmental Affairs, we, the people of the Commonwealth of Massachusetts, rely heavily on the decision of such professionals to touch the lives of so many people who are impacted with traffic. The Wynn Everett proposal is a solution to such painful epidemic we all are facing with daily. As an advocate of Wynn Everett, choosing this proposal will make our futures' bright.

Respectfully yours,

A handwritten signature in black ink, appearing to read "P. Giannikopoulos", written in a cursive style.

Peter Giannikopoulos

**From:** ML Older <marcolder@gmail.com>  
**Sent:** Sunday, August 03, 2014 5:25 AM  
**To:** Ziemba, John S (MGC)  
**Cc:** Ivey St John; Elizabeth Levin  
**Subject:** Re: Meeting with Massachusetts Gaming Commission Monday, August 4

Dear Mr. Ziemba,

Thank you for your invitation. Unfortunately, I will not be in Charlestown for the meeting on the 4th.

I would like the Commission to set as conditions:

1. That traffic models be run with the inclusion of an 8 minute interruption to simulate one or more boats requiring the Alford St. bridge to raise and lower.

Winn's transportation consultants will say that the bridge has and can restrict opening during rush hour, but casino and "ordinary" rush hours do not necessarily coincide. Traffic circles, such as Sullivan Square, are well known for failing when fully congested, as I believe could happen following a bridge opening.

2. That the traffic models be run with either a lane redesign or a traffic light that allows traffic to flow from Main St. Charlestown into Sullivan Square. Traffic improvements proposed by the Casino to move more vehicles from I-93 Northbound into Sullivan Square will cause a continuous flow of traffic past the Main St. entrance to the circle. For most of the day vehicles using this exit must enter the traffic circle illegally because the traffic from I-93, Washington St. and Rutherford Ave. already in the circle have the legal right of way.

This illegal move is required today and would get worse as the traffic flow is improved by Casino funded improvements. In my opinion, Charlestown residents and businesses must have a legal way of exiting their own community.

Thank you.

Marc Older  
[marcolder@gmail.com](mailto:marcolder@gmail.com)



**Bresilla, Colette (MGC)**

---

**From:** Elizabeth Levin <lizklevin@gmail.com> on behalf of Liz Levin <liz@lizlevin.com>  
**Sent:** Sunday, August 03, 2014 8:41 PM  
**To:** Ziemba, John S (MGC); MGCcomments (MGC)  
**Cc:** Mayor Walsh; Ryan, Dan - Rep. (HOU); Pressley Ayanna; LaMattina Salvatore; Davey, Richard (DOT); Scott, Beverly (MBTA); Bartlett Mauve; Draisen Marc; Anthony Gallagher; Gupta Vineet; Alison Felix; Keri Pyke; Gordon Chris; Fay Jamie; Levin Liz  
**Subject:** Wynn Casino Transportation Comments  
**Attachments:** RA-SS MGC Casino Letter FINAL August 2014.doc; ATT00001.htm

Dear MGC Commissioners,

Attached are suggestions for the conditions for any Casino license granted to Wynn Casino. Thank you for being so welcoming to community input.

Sincerely,

Liz Levin

LIZ LEVIN  
& COMPANY MANAGEMENT CONSULTING

August 3, 2014

Gayle Cameron, Commissioner  
James McHugh, Commissioner  
Bruce Stebbins, Commissioner  
Enrique Zuniga, Commissioner  
Rick Day, Executive Director

Massachusetts Gaming Commission  
84 State Street, 10<sup>th</sup> Floor  
Boston MA 02109

Re: Wynn Casino

Dear Gaming Commission Members,

I am a Charlestown Resident who lives on Bunker Hill St. near Sullivan Square. My Charlestown neighbors and I have devoted countless volunteer hours to help the City of Boston develop the Rutherford Ave./Sullivan Square Redesign Plan (Redesign Plan). The Redesign Plan improves traffic flow and makes our community more transit, pedestrian and bicycle friendly. When the Redesign Plan is built, my neighbors and I will finally be able to walk safely to the Orange Line and to drive safely through Sullivan Square without fear of an accident.

I appreciate that the Wynn proposal will create jobs, generate tax revenues, remediate a badly contaminated site and activate the Mystic River waterfront with water and open spaces uses. I also appreciate the work that the Wynn Casino has done in developing a more Sustainable Transportation Plan, particularly the Premium Park and Ride Service and the Ferry system. There are still, however, unanswered questions about the transportation impact of the casino on our Charlestown neighborhood and more mitigation is required. Here is what I see as the "common sense" mitigation that should be a condition of any Casino License issued to Wynn Casino

Specifically it is common sense that Wynn Casino:

- 1) Fund the Sullivan Square Phase of the Redesign Plan.**  
The FEIR shows the transportation impact of the Wynn Casino assuming that the Sullivan Square Rotary continues to be in place in 2023. The FEIR was silent on the impact of the Wynn Casino on the Redesign Plan except to say that the transportation mitigation improvements proposed by Wynn Casino would dovetail with the City's future roadway options for the area. We all know that today's Sullivan Square rotary no longer works. It doesn't work for the traffic; it doesn't

work for safe access to the MBTA and it doesn't work for encouraging new development at Sullivan Square. **Therefore, mitigating an antiquated traffic system that doesn't work makes no sense!!** The DEIR wisely assumed that in the "No Build Condition" that the approved Redesign Plan would be in place. This assumption should have been carried forward in the FEIR, but wasn't. Wynn Casino should now be asked to prepare and submit to MEPA and GMC the detailed traffic analyses for the project assuming the Redesign Plan is in place. If selected for a Casino license, the Wynn Casino license conditions should require that Wynn Casino fund the Sullivan Square Phase of the Redesign Design improvements including changes to the plan as result of the Casino. It should also require that the Sullivan Square street network should be built as soon as possible. The Rutherford Ave. phase of the Redesign Plan could follow subsequently and be more traditionally funded and/or funded by capture of some of the increased tax revenues at Sullivan Square made possible by the new street network.

It should be noted that the analyses of the Redesign Plan to be submitted to MEPA and MGC should cover not only the intersections in the FEIR but those on the south side of Sullivan Square that were modeled in the DEIR. The intersection with Main Street has been particularly troublesome for the community.

**2) Reduce the Parking Garage to 2900 parking spaces.**

The FEIR Wynn Casino program now includes a robust transportation demand management program. That program reduces trip generation, which is excellent. However, the FEIR Wynn Casino program now also includes a far larger garage than previously (3,700 spaces versus 2,900 spaces). This sizeable increase is most likely not warranted. As Cambridge MA has shown, smaller garages are an integral element of transportation demand management programs. My suggestion is that GMC license conditions include the original garage size of 2,900 and require that any subsequent increase in the size of the garage be done only after the project is operational and the traffic works well.

**3) Strengthen the Transportation Monitoring Program and Enforcement**

The FEIR transportation mitigation includes a transportation coordinator, the setting of annual transportation goals, an annual monitoring program and annual public report on the goals and the monitoring. The dollars devoted to this effort are \$30,000 annually. The program elements and costs should be strengthened. The labor and data collection elements of the program particularly should be strengthened to make sure that the transportation coordinator is a professional and that critical traffic, pedestrian and bicycle count information as well as mode share information are adequately captured and shared with the community. Funds should also be available for enforcement by the City and State. In addition, there should be an option to extend the monitoring program for an additional five years if the traffic goals aren't met and/or traffic conditions are worse than predicted.

**4) Fund a Transit Study of the Orange Line.**

The Orange Line is a workhorse of the MBTA system. The MBTA is buying new Orange Line cars. With these new cars there is an opportunity to make power and track improvements that collectively would make the customer trips more comfortable and convenient all along the line. The study proposed here would contribute to moving forward important Orange Line improvements. It would help Wynn Casino's employees and customers who may choose to ride the Orange Line as well as residents of Charlestown, Everett, Somerville, Malden and Medford.

**5) Fund a Visioning Program for Charlestown.**

Charlestown residents do not have an overall master plan for future development along the south side of Rutherford Ave., the entire Sullivan Square and Mystic waterfront area. Many of us have been requesting that the BRA undertake a community visioning effort for that purpose. It would be appropriate for Wynn Casino to fund that study since Wynn Casino will impact development potential in the area. The study will help the community have a unified vision and provide the appropriate land use and zoning controls to attract development it wants and to discourage development it doesn't want.

**6) Fund Public Engagement in the Construction & Remediation Management Program**

Remediation & Construction of the Wynn Casino will be a major effort. There should be a well thought out public engagement program. Of particular interest to Charlestown residents will be traffic and public safety issues associated with construction traffic, closure of streets and site remediation.

We all have an interest in making Sullivan Square work.

- The City of Boston owns valuable property in the area that could be developed.
- The MBTA has an Intermodal Orange Line Station and Bus Station as well as the Charlestown Maintenance/Repair Facility as well as other property.
- Route 99 is a State Road.
- The residents and workers of Charlestown and Everett drive regularly through Sullivan Square and are often riders of the Orange Line and buses at that location.
- Wynn Casino needs good access through Sullivan Square for customers and employees.

We have watched this area languish for many years. It is our collective responsibility to fix it. The license conditions suggested here will assure that if the Wynn Casino is built we aren't just putting "lipstick on the pig of Sullivan Square" but are establishing a street network and neighborhood for the future.

Thank you for your leadership.

Sincerely,

Elizabeth K. Levin  
Elizabeth Levin

Cc:

Mayor Marty Walsh, City of Boston  
State Representative Dan Ryan  
City Councilor Ayanna Pressley  
City Councilor Sal LaMattina  
Richard Davey, Secretary of Transportation  
Beverly Scott, CEO/General Manager MBTA  
John Ziemba, Gambling Commission  
Maive Valley Bartlett, MEPA  
Marc Draisen, MAPC  
Anthony Gallager, City of Boston  
Vineet Gupta, City of Boston  
Allison Felix, MAPC  
Keri Pyke, HSH  
Chris Gordon, Dirigo Group  
Jamie Fay, Fort Point Associates

**Bresilla, Colette (MGC)**

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**From:** Joseph Marino <marinoj93@yahoo.com>  
**Sent:** Friday, August 01, 2014 11:13 AM  
**To:** MGCcomments (MGC)  
**Subject:** wynn,llc

Dear Commissioners,

Three critical reasons why the casino should be in Everett.

First, Wynn resorts is recognized the world over with 5 star hotels and stellar reputation to cater to its guests. This practice translates to more business and more of a share of money for Massachusetts, just look at it's balance sheet. ( Mohegan Sun has been losing business)

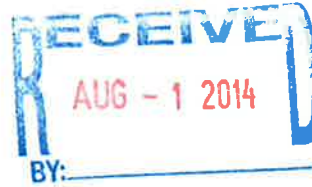
Second, the Everett SITE will be decontaminated at NO expense to the taxpayer. The building of the casino in Everett will be a catalyst to business development on the shores of the Mystic River of Medford, Somerville and Charlestown.

Third, land traffic will lessen with a flyover ramp over Santilli Circle, water taxis being used from Logan Airport, Boston and the south shore. And also, Everett being the poorest city around, needs and wants this project.  
Everett is the rite site.

Thank you, Joseph Marino

# HENRY F. OWENS, INC.

MOVERS AND WAREHOUSEMEN  
46 GARDEN STREET EVERETT, MASSACHUSETTS 02149-4512  
(617) 381 - 1000



July 30, 2014

Commissioner Gayle Cameron  
Massachusetts Gaming Commission  
84 State Street | 10<sup>th</sup> Floor  
Boston, MA 02109

The Honorable Commissioner Cameron:

It was a pleasure meeting you Friday, July 18th at Franklin Park for the 11th Annual Roxbury Community College Golf Outing. My father has been supporting the Roxbury Community College Foundation over the past decade.

Your presence did not go unrecognized. The Gaming Commission has been very vocal about supporting charitable organizations as well as local minority and woman-owned businesses. It was nice to see that first-hand.

I am writing this letter to show my support for the Wynn Everett Casino. I believe it is vital to the City of Everett and the Greater Boston area as a whole.

It is clear from the broad support across Everett that residents want Mr. Wynn to develop the former Monsanto Chemical Plant. The voters ratified the host agreement by an 86 percent to 14 percent margin.

My father mentioned to you that we are the oldest minority-owned company in New England with a history dating back to 1927. We have been in business almost 100 years, and we take great pride in that.

We are a commercial union moving and warehousing company located in Everett less than one mile from the proposed Wynn Everett Casino.

The past two years, my father and I have spent endless hours discussing, attending meetings, planning, and waiting for what could lead us into our fourth generation as a family-owned business. For us, this decision is about creating jobs, providing a better life for our employees, and re-investing in Everett and the surrounding communities. It is that simple.

The past few years have been very challenging for all small, family, and minority-owned businesses, including ours. We lost a significant amount of moving business as a result of the downturn in the economy, corporate downsizing, and changes in the moving industry. We used to contribute over \$1.6 million annually in payroll and benefits to our workforce who primarily live in the Roxbury, Dorchester, Mattapan, Chelsea,

and Everett neighborhoods. Although the Massachusetts unemployment rate is around 5.5%, it is nearly double that for African Americans and Hispanics. These groups make up 95% of our workforce.

We fully support the Wynn proposal for the simple reason that few casino developers have had a greater impact on their industry than Mr. Wynn. Isn't this the goal of the Commission – to award the Region A License to an applicant whose undertakings will not only benefit the City of Everett or Revere but the whole Commonwealth?

The City of Everett has one of the highest commercial property tax rates in the State of Massachusetts, making it very difficult to attract and encourage development.

The commitment that Mr. Wynn has made to the City of Everett will allow us to expand our moving company and provide us with the resources to explore opportunities in the convention center business as well as investments in real estate and solar energy.

The vision of making Boston an international destination is more real if Mr. Wynn is awarded the Region A License particularly as Boston explores measures to become host city for the 2024 Summer Olympics and with Governor Patrick's authorization of a \$1 billion expansion of the Boston Convention and Exhibition Center.

I kindly ask that you consider these important factors in making your decision on September 12, 2014. From our perspective, you will be giving even more opportunities to the oldest minority-owned company in New England and supporting many of the families you see in the company picture I have enclosed.

Sincerely,

Edward O. Owens, Jr., CPA  
Owens Companies  
Chief Financial Officer



**Bresilla, Colette (MGC)**

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**From:** MGC Website <website@massgaming.com>  
**Sent:** Thursday, July 31, 2014 3:57 PM  
**To:** MGCcomments (MGC)  
**Subject:** Contact the Commissioner Form Submission

**Name**

Eric Lee

**Email**

[Elsie52@aol.com](mailto:Elsie52@aol.com)

**Subject**

Casino

**Questions or Comments**

I fully support Wynn Casino in Everett.

**Bresilla, Colette (MGC)**

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**From:** MGC Website <website@massgaming.com>  
**Sent:** Wednesday, July 30, 2014 8:17 PM  
**To:** MGCcomments (MGC)  
**Subject:** Contact the Commissioner Form Submission

**Name**

Charles Boy

**Email**

[cab02149@comcast.net](mailto:cab02149@comcast.net)

**Phone**

(617)387-5473

**Subject**

Everett Casino

**Questions or Comments**

Seems like every neighbor I have asked who lives around me opposes Everett as a casino location. Wonder why? Or are we just expected "background noise"? Those who favor, either do not live around here or have heads "in the clouds". Most don't drive or if they do, not much, and do not notice much.  
This is trouble. Permanent. Genuine 'bloodletting' for those on the ground.  
I understand blindness on Beacon Hill, I think it is merely one segment of a larger, collective incompetence. State government can't deal adequately with casinos; before, during and after.

**Bresilla, Colette (MGC)**

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**From:** Frederick Naumann <frederick.naumann@reagan.com>  
**Sent:** Wednesday, July 23, 2014 2:37 PM  
**To:** MGCcomments (MGC)  
**Subject:** I support the Wynn Everett

Dear Commissioners Crosby, Cameron, McHugh, Zuniga & Stebbins:

Hello! My name is Frederick Naumann and I would like to tell you that I am in full support of the Wynn Everett proposal. The project will benefit all of Massachusetts in much greater ways than what the other proposal can do. From my point of view, it's simple: Wynn's proposal is the only real choice for the people of Massachusetts.

The jobs that will be created by the Wynn project are just what this state needs. There will be 4,000 long-term jobs at the Wynn, well-known as the best jobs in that industry. With Wynn's expertise and track record in the business, surrounded by loyal employees who want to go the extra mile for his customers, and with over \$2 billion dollars in the bank, his promises to deliver are completely backed up, in my opinion. To my mind, there is no other option than the Wynn. The Wynn puts the other guys to shame. This is exactly what Massachusetts needs!

Respectfully, I urge you to support the Wynn proposal for all of its positive benefits. They can back everything they say to us and I know this is the smartest choice of all. Wynn has more money in his pockets than the other casino company, and people from all over the world will be traveling to his 5 star resort, ready to spend their money, money that will go to our cities and our state. Also the fact that these small businesses in the surrounding area will not be hurt by this attraction is huge. This is a deal that should not be passed up, so please support the Wynn! Thank You!

Yours sincerely,

Frederick Naumann  
59 Chelsea St, 10  
Everett, MA 02149

**Bresilla, Colette (MGC)**

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**From:** adam luce <adteen2001@yahoo.com>  
**Sent:** Wednesday, July 23, 2014 2:37 PM  
**To:** MGCcomments (MGC)  
**Subject:** Please Approve The Wynn In Everett

Dear Commissioners Crosby, Cameron, McHugh, Zuniga & Stebbins:

Hello. My name is adam luce and I live in Quincy. I'm sending this letter to mark myself down as one more person who wants to see that Wynn tower rise over the Mystic River. They've got a great plan, and I think it should be approved.

Steve Wynn is recognized worldwide as a time-proven luxury resort operator. His name is his brand, and he would never risk damaging his brand by building anything but the best possible resort casino in Massachusetts. Wynn Everett will attract customers from Massachusetts and beyond - which will ensure success for Massachusetts taxpayers. The other applicants? Not so much, with a three-star facility quickly slapped together.

This is one of the most important decisions to be made for the people of Massachusetts in generations. I am certain that the Wynn plan is the best, and respectfully ask that you award the Boston region license to Wynn Everett.

Yours sincerely,

adam luce  
91 clay st apt 504  
Quincy, MA 02170

**Bresilla, Colette (MGC)**

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**From:** Hollie Stacey <hollie\_stacey@msn.com>  
**Sent:** Tuesday, July 22, 2014 3:23 PM  
**To:** MGCcomments (MGC)  
**Subject:** My Opinion on Gaming License for Region A

Dear Members of the Massachusetts Gaming Commission:

I am writing to you as a resident of Croydon, UK to urge your support of the Wynn Resorts project.

Wynn Resorts holds more Forbes Five Stars than any other independent hotel company in the world. Forbes Travel Guide's Star rating designations are the gold standard for hospitality excellence. This is the type of destination resort that we need to attract national and international tourism to the area.

Please make the best choice when selecting the casino developer and operator for the Boston area. The Wynn Everett plan is the better one by every standard set by your regulations.

Yours sincerely,

Hollie Stacey  
80 Cross Rd  
Croydon, UK, CR06TB

**Bresilla, Colette (MGC)**

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**From:** Susan Scialoia <sscialoia55@gmail.com>  
**Sent:** Sunday, July 20, 2014 3:54 PM  
**To:** MGCcomments (MGC)  
**Subject:** WE WANT WYNN!

Dear Commissioners:

I am writing to request your support of the Wynn Resorts project as it is the best proposal for the region.

There are a lot things to be said about Steve Wynn and the Everett casino plan - all the jobs and the taxes and other economic benefits, not to take away from those things at all - but the one that I'm most excited about is the way it will one, clean up the utter disaster that is that Monsanto site, and two, open up the waterfront for people to use and enjoy again. To think that visitors will be able to come to the Wynn by water taxi or their own boat, that we'll be able to walk by the river again, and to have such a beautiful complex there for the benefit of Everett, Somerville, Medford, Charlestown and all the visitors from Massachusetts and around the world, well, that's reason enough to support this plan 100%.

I hope I can count on your support. Thank you for your consideration.

Yours sincerely,

Susan Scialoia  
36 Villa Ave  
Everett, MA 02149

**Bresilla, Colette (MGC)**

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**From:** nancy isbart <nisbart@gmail.com>  
**Sent:** Wednesday, July 16, 2014 9:24 AM  
**To:** MGCcomments (MGC)  
**Subject:** WE WANT WYNN!

Dear Members of the Massachusetts Gaming Commission:

Greetings! My name is nancy isbart and I am in full support of the Wynn Everett proposal. The benefits this project will bring to all of Massachusetts will be tremendous.

Wynn was named the number one large employer in Vegas by his own employees, which to me is evidence of how great this proposal is compared to the others. He's created a culture of excellence and loyalty by treating his employees well and creating the kinds of jobs that people consider themselves lucky to have. This is exactly the kind of company we need here in Massachusetts. I want to know that I, or my friends, or my kids or my neighbors could have an opportunity like that, to work for this company. When the industry - including the ones from Connecticut - were laying people off by the thousands, Wynn was keeping his folks employed. That's a rare quality, one we could use here in the Commonwealth!

I hope I can count on your support. Thank you for your consideration.

Yours sincerely,

nancy isbart  
21 VALLEY RD  
WOBURN, MA 01801

**Bresilla, Colette (MGC)**

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**From:** Larry Tokson <ltokson@gmail.com>  
**Sent:** Wednesday, July 16, 2014 9:24 AM  
**To:** MGCcomments (MGC)  
**Subject:** Mass should be Wynners, not Losers

Dear Commissioners Crosby, Cameron, McHugh, Zuniga & Stebbins:

I want the Massachusetts Gaming Commission to know my family enthusiastically supports the Wynn Resorts plan for a spectacular destination resort and casino in Everett. The residents of Everett overwhelmingly supported the Wynn plan and it far exceeds the competition, which keeps changing its proposals.

The jobs that will be created by the Wynn project are just what this state needs. There will be 4,000 long-term jobs at the Wynn, well-known as the best jobs in that industry. With Wynn's expertise and track record in the business, surrounded by loyal employees who want to go the extra mile for his customers, and with over \$2 billion dollars in the bank, his promises to deliver are completely backed up, in my opinion. To my mind, there is no other option than the Wynn. The Wynn puts the other guys to shame. This is exactly what Massachusetts needs!

Thank you for reading my message. I respectfully submit that when you evaluate all aspects of the competing applications, the choice is not even close. Please award the important Boston Region casino license to Wynn Everett.

Yours sincerely,

Larry Tokson  
39 LUKE ROAD  
Everett, MA 02149



**Bresilla, Colette (MGC)**

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**From:** Kathleen Racki <kaytekirby@yahoo.com>  
**Sent:** Wednesday, July 16, 2014 9:24 AM  
**To:** MGCcomments (MGC)  
**Subject:** I support the Wynn Everett

Dear Commissioners Crosby, Cameron, McHugh, Zuniga & Stebbins:

Hello! My name is Kathleen Racki and I would like to tell you that I am in full support of the Wynn Everett proposal. The project will benefit all of Massachusetts in much greater ways than what the other proposal can do. From my point of view, it's simple: Wynn's proposal is the only real choice for the people of Massachusetts.

The jobs that will be created by the Wynn project are just what this state needs. There will be 4,000 long-term jobs at the Wynn, well-known as the best jobs in that industry. With Wynn's expertise and track record in the business, surrounded by loyal employees who want to go the extra mile for his customers, and with over \$2 billion dollars in the bank, his promises to deliver are completely backed up, in my opinion. To my mind, there is no other option than the Wynn. The Wynn puts the other guys to shame. This is exactly what Massachusetts needs!

As a resident here in Everett I urge you to support the Wynn proposal. He has the money, expertise and track record that these other guys do not have, and a business model that promises to deliver. The 5 star resort will bring tourists from all over the world to this attraction along with their dollars that will benefit the whole state. This is too good to pass up - please support the Wynn!

Yours sincerely,

Kathleen Racki  
32 franklin st  
Everett, MA 02149



July 10, 2014

Aaron Gornstein, Undersecretary  
Executive Office of Housing and Economic Development  
Department of Housing and Community Development  
100 Cambridge Street, Suite 300  
Boston, MA 02114

I write with respect to the Lower Broadway District Urban Renewal Plan (the Plan) as approved by the Everett Redevelopment Authority (ERA), and, most recently, on April 28, 2014, by the Everett City Council. My wife and I are residents and business owners in Somerville - including owners of a new business, which will be located at Assembly Row. We have followed closely the details relating to the siting of a casino across Somerville's border with the City of Everett. As residents and business owners, we are opposed to the casino proposal for the Everett Site. Indeed, we agree with many of the objections that have been raised in the past – including an objection questioning whether it could be the case that the City of Everett would go to the lengths of actually creating a redevelopment authority to try to avoid compliance with various state laws. To my shock, it appears as though they have.

As you know, c. 121B, s. 48 prohibits the DHCD from approving the Plan unless it shall have found that:

- (a) the project area would not by private enterprise alone and without either government subsidy or the exercise of governmental powers be made available for urban renewal;
- (b) the proposed land uses and building requirements in the project area will afford maximum opportunity to privately financed urban renewal consistent with the sound needs of the locality as a whole;
- (c) the financial plan is sound;
- (d) the project area is a decadent, substandard or blighted open area;
- (e) that the urban renewal plan is sufficiently complete, as required by section one; and
- (f) the relocation plan has been approved under chapter seventy-nine A.

Page 2

Since the Plan fails to come close to providing the documentation needed to support several of these factors, documentation that may indeed never be able to be provided, I urge DHCD to reject the Plan.

1. Private Enterprise: The finding that the “project area would not by private enterprise alone and without either government subsidy or the exercise of governmental powers be made available for urban renewal” is at the core of the urban renewal law, yet on its face is one the Plan cannot begin to meet. The main thrust of the Plan is that the “Staging Area” cannot be redeveloped through the ordinary operation of private enterprise. As has been extensively documented, the land that is targeted for clearance, including the “Staging Area” now owned by FBT Everett Realty, LLC, is the subject of a detailed filing with the Massachusetts Gaming Commission (Commission). Contrary to the claims made in the Plan, that filing seeks to document for the Commission, in excruciating detail, precisely the opposite – that private investment mandated by the Expanded Gaming Act will cause the redevelopment of much of the project area (Area) in precisely the way the Plan anticipates.

In an effort to avoid benefits accruing to certain persons with a criminal past, the Commission has undergone an investigation and taken extensive testimony regarding the value of the Staging Area, and has determined \$35M to be a fair price for the property, the vast majority of which was purchased by the current owners in October of 2009 for \$8M. Putting aside, for now, the fact that the Plan reveals no revenue source to compensate the current owners for the land, this sort of value and appreciation in value hardly supports the claims made in the Plan that the Staging Area contributes to the decadent condition of the Area and is the key property in the Area that cannot be redeveloped by private parties. In fact, according to testimony taken by the Commission, it appears to be quite valuable – appreciating by more than \$27M in just a few years. That value seems to be underscored by the fact that a reported \$100,000 is being paid monthly to the current owners for an option. Conversely, if in fact the Area cannot be redeveloped through private enterprise alone, the Plan calls into question the viability of Wynn’s submission and testimony to the Commission.

So, I ask, and state that both DHCD and the Commission must ask, which is it – is the Staging Area the site of massive private investment as Wynn has stated to the Commission and as the City anticipated when it signed its Host Community Agreement with Wynn, or is it in such a condition as to fundamentally not be capable of redevelopment without the types of assistance called for in the Plan? It can’t be both.

2. Private Investment/Sound Needs of the Locality: On its face, the Plan appears to be a mere pretense to assist in the development of gaming in the area, as evidenced by the fact that the Lower Broadway District Master Plan, which purports to inform parts of the Plan, was originally developed and completed in 2012, long

before gaming was proposed for the Area. The master plan makes no mention of the importance of gaming or the role that gaming might play in the Area. Moreover, as has been pointed out in the past by others, Everett didn't even have a redevelopment authority until recently - the ERA was not approved by the City Council and Board of Aldermen until October of 2013 and its members were not appointed until late February 2014.

Yet, it's obvious that the ERA and the Plan were created for one purpose: to assist in developing the casino. And, the Plan doesn't nibble around the edges - it calls for the taking of the "Staging Area" - the principal site of the Wynn resort and several privately-owned properties that are either a part of the proposed Wynn site or are needed for access to the Wynn site, all the while claiming that these extraordinary actions are needed to eliminate the "decadent" Area. In truth, they are needed for one purpose that bears little relation to sound planning - to assist Wynn in winning a license - actions that are quite simply unconstitutional takings made solely for private gain. Indeed, the Mayor of Everett was quoted after the Board of Aldermen meeting that created a new Everett Redevelopment Authority as saying "I'm just excited, because we took a step closer to being a united city... When you think that 86 percent of the (voters) came out to vote in favor of this casino proposal on a hot Saturday night, this action means that the city government is working with them."

3. Financial Plan: The ERA has no resources to support the actions outlined in the Plan. The financial section of the Plan provides that \$78M will be needed to pay for the actions in the Plan, citing \$41M of the sources with a "possible land swap with the MBTA" and a host of other public funding programs, including multiple MassWorks awards and a \$2M contribution from the City of Everett. There is no support for the conclusion that these funds are available. A land swap with the MBTA, even if possible (see below), does not provide the form of cash necessary to pay land damages and relocation payments required to perform the clearance and spot clearance activities called for in the Plan. Moreover, without financial resources, the ERA will not be in a position to post the security necessary to support the obligations in the plan, which is a precondition to land acquisition under c. 121B, s. 11(d) and c. 79, s. 40.

In addition to the budget details, the Plan also lacks specific information. As you know, 760 CMR 12.02(4) requires the following:

Financial Plan. Cost estimates establishing:

- (a) The estimated cost of each parcel (or interest in a parcel) to be acquired with an attached appraisal / from a licensed appraiser in private practice (appraisal services shall be procured in accordance with M.G.L. c. 30B) and identification of any property in which any officer or employee of the municipality or of the operating agency has, or is believed to have, any direct or indirect interest,

Page 4

- (b) Detailed cost estimates for site preparation,
- (c) Detailed cost estimates of all proposed public improvements,
- (d) Detailed cost estimates for relocation expenses,
- (e) Detailed cost estimates establishing the gross and net project cost (Gross project cost shall consist of the total of all costs associated with the project, including but not limited to planning, acquisition and disposition of land, relocation of occupants, improvements to the site, financing and administrative costs. Net project cost shall be the gross project cost less revenue anticipated from disposition of land and other income), and
- (f) A project budget including administrative expenses and reserves for contingencies.

None of the above has been revealed to the public, nor has a relocation plan been prepared.

4. The Findings are Inadequate and Unsupported: The Plan does not address designated decadent, substandard or blighted open areas. Here, the Plan falls far short of the legal standard. As but one example, despite including traditional urban renewal language and arguments to support the conclusion that the area is decadent, substandard or blighted open area, the Plan claims that only 17% of the properties in the entire area are either in “moderate disrepair” or “severe disrepair” (Table 10, p. 51).

More generally and perhaps more importantly, the Plan includes very little data, and the data it does include relies on the importance of the “Staging Area” to the overall Area, creating the misleading impression of the condition of the Area. This issue is compounded by the fact that the actions outlined in the Plan do not propose to cure the aspects of the Lower Broadway District that contribute to its alleged decadent condition. Rather, the principal action in the Plan is to widen the main boulevard that the Plan notes is in “very good to excellent condition” and to acquire the Staging Area and parcels around the Staging Area to facilitate the development of the resort. Little to no actions are proposed to eliminate the conditions that are claimed to support the underlying findings, such as to rehabilitate the buildings that are claimed to be in disrepair. In this regard, it is clear that the Plan sole purpose is to assist the Wynn resort – assistance that Wynn itself has officially claimed to not need. Without these public objectives being served, the Plan cannot be approved.

Aside from failing to meet the criteria for urban renewal approval by the DHCD, the Plan raises other concerns. It raises questions that remain unanswered about the future of the MBTA’s Everett facility. The Plan misstates the law with respect to MBTA’s obligations

Page 5

related to the disposition of land by claiming that the MBTA is subject to Chapter 30B (p. 55) rather than c. 161A, s. 5, which requires public advertising as a pre-condition to the MBTA's authority to dispose of land. Instead, the Plan seeks to avoid the advertising requirements by stating, "[t]he sale of property from one public agency to another does not require public bidding." While c. 161A does indeed ordinarily permit the MBTA to sell its property to the public agencies such as the ERA without public bidding, that cannot be the conclusion in this instance. Here, it is readily apparent that the conveyance would serve no public purpose and a lengthy public record has been built by the MBTA and the Massachusetts Department of Transportation regarding their collective requirements for accommodating the Everett MBTA facility – a record that makes it clear that it is Wynn, and not the City, with which the MBTA is negotiating. In this way, the Plan appears to be creating a shield against which the City, the ERA, and Wynn can avoid a public procurement process required to protect the MBTA and the taxpayers and farepayers who support the MBTA's system. As but one example of why such a process is paramount, the Plan doesn't begin to explain how the impacts to the MBTA's facility, a major subway repair facility and key regional asset, will be mitigated.

I believe that the Plan fails to meet the criteria for urban renewal plan approval by the DHCD and undermines the spirit of the laws governing urban renewal and gaming in the Commonwealth, and if approved, would establish dangerous precedents in Massachusetts. It directly contradicts significant public filings and representations made to the Commission, and it calls for actions that are unquestionably both a violation of state law and are unconstitutional. In my opinion it cannot and should not be approved.

Thank you for your attention to this important matter.

Sincerely



John DeSimone

92 Thurston Street #2

Somerville, MA 02145

cc: Massachusetts Gaming Commission

Good evening: My name is Joseph Marino, I have lived in Everett for more than 50 years.

Every person that has spoken at these Commission hearings that come from Everett or Revere wants the casino in their city, its only natural that they want it in their city, and if the proposals were close, all that this Commission would have to do is to toss a coin to see which city gets the casino. THE PROPOSALS ARE NOT CLOSE AT ALL.

This past January 22, this commission said "the two plans are very different from each other". That statement, could not be more true, we all agree.

First of all, a five star resort hotel is allot better than a 3 star hotel, because of it's Splendor, this 5 star hotel, would draw more people, especially from overseas.

Being on the Mystic river, it is easier to get to by land and water,  
Improving land traffic.

This hotel will be run under the direction of Steve Wynn, a professional who has experience of operating resort hotels the world over, earning 5 star ratings from Forbs Magazine and given high praise from other magazines.

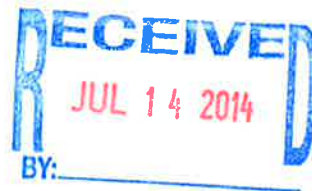
High on Mr. Wynn's list is fair treatment for all his employees, witch in turn, leads to better treatment for guests....that's why Mr. Wynn's 2 favorite words are "Guest Experience"

Steve Wynn has world wide experience for some 40 years and the best choice to succeed in Everett for more of a share of the income for the Commonwealth of Massachussetts

Because of it's glittering height, when this 5 star resort hotel is built in Everett, it

Will be recognised as a Shining Beacon that can be seen from all around.

I Thank you for hearing me.



**Bresilla, Colette (MGC)**

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**From:** Richard Scudder <mobile.rscudder@gmail.com>  
**Sent:** Friday, July 11, 2014 2:52 PM  
**To:** MGCcomments (MGC)  
**Subject:** 100% with Wynn!

Dear Commissioners:

The Wynn Resorts project will provide numerous benefits for the people of Greater Boston.

There are a lot things to be said about Steve Wynn and the Everett casino plan - all the jobs and the taxes and other economic benefits, not to take away from those things at all - but the one that I'm most excited about is the way it will one, clean up the utter disaster that is that Monsanto site, and two, open up the waterfront for people to use and enjoy again. To think that visitors will be able to come to the Wynn by water taxi or their own boat, that we'll be able to walk by the river again, and to have such a beautiful complex there for the benefit of Everett, Somerville, Medford, Charlestown and all the visitors from Massachusetts and around the world, well, that's reason enough to support this plan 100%.

As a resident here in Beavercreek I urge you to support the Wynn proposal. He has the money, expertise and track record that these other guys do not have, and a business model that promises to deliver. The 5 star resort will bring tourists from all over the world to this attraction along with their dollars that will benefit the whole state. This is too good to pass up - please support the Wynn!

Yours sincerely,

Richard Scudder  
2791 Stone Mill Place  
Beavercreek, OH 45434



**Bresilla, Colette (MGC)**

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**From:** joe giordano <joeg679@yahoo.com>  
**Sent:** Friday, July 11, 2014 2:52 PM  
**To:** MGCcomments (MGC)  
**Subject:** Massachusetts deserves 5 Star Treatment

Dear Commissioners:

I hope the gaming commission will consider all of the facts closely and approve the Everett plan by Wynn Resorts for a state casino license. Wynn's application to build a world-class resort in Everett is the best choice to benefit Massachusetts - by far.

The Wynn Everett plan not only is strongest based on finances, aesthetics, corporate reputation, local community commitment and regional benefits, but it will get built soonest. That means the tax and other benefits will be greater. Wynn, unlike the other applicant with multiple ownership, will not build the Everett resort in 'phases.' I just seems to me that Wynn is the obvious choice on every criteria.

I hope I can count on your support. Thank you for your consideration.

Yours sincerely,

joe giordano  
710 beechwood drive  
washington township, NJ 07676

**Bresilla, Colette (MGC)**

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**From:** Joan Lodi <angellic43@hotmail.com>  
**Sent:** Friday, July 11, 2014 2:52 PM  
**To:** MGCcomments (MGC)  
**Subject:** Massachusetts deserves 5 Star Treatment

Dear Commissioners:

I am writing to request your support of the Wynn Resorts project as it is the best proposal for the region.

Wynn was named the number one large employer in Vegas by his own employees, which to me is evidence of how great this proposal is compared to the others. He's created a culture of excellence and loyalty by treating his employees well and creating the kinds of jobs that people consider themselves lucky to have. This is exactly the kind of company we need here in Massachusetts. I want to know that I, or my friends, or my kids or my neighbors could have an opportunity like that, to work for this company. When the industry - including the ones from Connecticut - were laying people off by the thousands, Wynn was keeping his folks employed. That's a rare quality, one we could use here in the Commonwealth!

Please make the best choice when selecting the casino developer and operator for the Boston area. The Wynn Everett plan is the better one by every standard set by your regulations.

Yours sincerely,

Joan Lodi  
2 John Street  
Reading, MA 01867

**Bresilla, Colette (MGC)**

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**From:** Sarah Choe <sarahchoe326@gmail.com>  
**Sent:** Thursday, July 10, 2014 10:33 AM  
**To:** MGCcomments (MGC)  
**Subject:** I believe in Steve Wynn

Dear Commissioners Crosby, Cameron, McHugh, Zuniga & Stebbins:

I write to encourage you to select the Wynn application for Everett for the state casino license in the Boston area. I have looked at both proposals, and believe the choice is not even close when it comes to how a resort casino will benefit the metropolitan Boston region and the entire state.

The Wynn proposal consists of building a magnificent hotel and resort casino on the former Monsanto plant along the Mystic River. This project would not only clean up a contaminated site but would serve as a catalyst for revitalizing the entire waterfront and surrounding communities.

Therefore, I respectfully urge your favorable consideration of this project. Thank you for your attention to this matter.

Yours sincerely,

Sarah Choe  
18028 W. Cheryl Drive  
Waddell, AZ 85355



July 9, 2014

Commissioner James McHugh  
Massachusetts Gaming Commission  
84 State Street, Suite 720  
Boston MA 02109

Re: Building Design Comments on Revere and Everett Casino Designs – AIA MA Design Panel Members

Dear Commissioner McHugh:

As per your request from our phone conversation of July 1, 2014, please see below for the names of the nine design panel members who were convened by AIA Massachusetts to review the Mohegan Sun and Wynn design proposals.

**Names**

Keith Chenot, AIA  
Alfredo DiMauro, Associate AIA  
Michael Dipasquale AIA  
Jacques M. Fauteux, AIA  
David Gamble AIA  
Ludmilla Pavlova-Gillham AIA  
Andrea Leers FAIA  
Jason Newman Associate AIA  
Patrick Tedesco AIA

If you have any further questions, please feel free to contact me at your earliest convenience.

Very truly yours;

A handwritten signature in dark ink that reads "John Nunnari".

John Nunnari Assoc. AIA  
Executive Director  
AIA Massachusetts



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## **MEMORANDUM**

To: Massachusetts Gaming Commission (MGC)  
 From: John Nunnari, Executive Director, AIA Massachusetts  
 Date: 06/27/2014  
 Re: Building Design Comments on Revere and Everett Casino Designs

The Massachusetts Chapter of the American Institute of Architects (AIA MA) offers these consolidated professional comments to assist the Gaming Commission in evaluating the designs proposed for the two competing proposals (Revere and Everett) for a resort-casino facility in the greater Boston area (Region A).

### **Summary**

A panel of architectural professionals convened by AIA MA unanimously found that the proposal by Mohegan Sun for Revere was markedly superior in every design aspect to the proposal by Wynn for Everett.

The Revere design is playful, has two inviting entrances, is pedestrian friendly, and makes good connections to public transit and the surrounding community. While smaller than the Everett facility, the Revere building projects a grand civic presence. The proposed resort-casino is a creative, successful design for the site. The design also echoes Revere's history of recreation and links the resort to its beach. The design allows for visible and significant integration of sustainability features.

The Everett design seems stale, has very poor massing and program (a massive hotel tower just sits on top of a vast horizontal casino base), and fails to aggressively take advantage of its waterfront location. There appears to be little innovation in any aspect of the exterior design. The presentation lacks sufficient detail and site-specific elements; most images are from other casinos. There is no clear functional analysis. The written materials provide little additional design information. There is no significant connection to the surroundings. The complex lacks a celebratory approach to the facility.

The panel considered general design excellence (including creativity, sensitivity to and integration with surroundings, coordination of program elements, landscape, public spaces), transportation design (vehicular access, public transit, pedestrian access, circulation), gaming design, resort design (hotel, entertainment), and sustainable design. The comments below set out a summary of the panel's: (1) General comments; (2) Revere proposal comments; (3) Everett proposal comments; (4) Concerns; and (5) Recommendations.

Note: AIA MA is not endorsing any design or approving any proposed design or design elements.

### **General Comments**

The Gaming Commission should seize the opportunity to create a new casino model. The new model of "a Massachusetts casino" would provide excellence in all aspects of design, quality materials, visible and significant sustainability features, and realistic integration with the community. A resort-casino may well be the biggest development and investment in Revere or Everett in a generation. The Commission should not accept anything less than a resort-casino design that enhances the scale and character of the site and its surroundings, strengthens local communities, and is a showcase of sustainable, thoughtful, and lively design.

A design panel of nine architects was organized by AIA MA on June 18, 2014. The panel reviewed the plans and renderings that Mohegan Sun and Wynn had submitted to the Commission as well as the written design responses by the two applicants that were submitted to the Commission.



The AIA MA comments and recommendations focus on the exterior design features of the two proposals, including the integration of the resort-casino with the surrounding community and the visual or aesthetic impact of the resort-casino on the surrounding community. The comments, concerns, and recommendations set out below are consolidated from those voiced by the professional architectural panel.

AIA MA is available to help the Commission with any questions or follow up. Please see the last page below for how to contact us.

#### **Revere proposal comments**

The Mohegan Sun proposal for Revere designed by Kohn Pedersen Fox (KPF) reflects overall quality design. The proposal (all elements – casino, hotel, access, etc.) creatively and successfully fits into a challenging site between the Suffolk Downs racetrack and the surrounding neighborhood.

Although the panel is concerned about a long blank wall facing Washburn Ave. (see concerns below), the design shows sensitivity to the local community by breaking up the massing into different medium-level heights and having an entrance at Winthrop and Washburn that enlivens the street and functions as a celebratory entry for pedestrians, those arriving by bus and the nearby Beachmont subway stop, and passers-by. The landscaping near this entrance helps soften the impact. This Beachmont entrance also links the resort to the beach. The overall design concept embraces the history of Revere through the use of playful beach umbrellas as a metaphor. While some design elements are internally focused, the project holds the potential to help revitalize Revere.

The Revere design is curvy, playful, fun architecture that fits Revere's long history of recreation and entertainment: beach, honky tonk amusements, ballroom, and racing. This local history theme is integrated into the project (not just tacked on) by using large-scale umbrellas and canopies as the primary design elements. The large canopies work well with the scale of the site. The proposed project feels like a true destination.

The design program and massing work well. By dividing the hotel into two elements, the space appears well distributed across the site. This design approach helps diminish what could have been a large, overpowering vertical element. In addition, by stacking the two hotels over the casino and meeting space and by including retail in between, the project provides significant space for different activities without appearing massive (as if it were just a tall tower over a sprawling one-story building). This proposal is smaller than Everett, yet it seems bigger. The Revere casino-resort has a grander presence than the Everett proposal, yet it also shows a beneficial civic impact and some level of restraint. The distribution of the program is well organized.

The Revere design for the drive-up entrance (porte cochere) works well. The canopies there are playful but also can function to provide protection in winter or rainy weather and add lighting by reflecting light back down. The landscape approach integrates the building into the site rather than further separating it.

The design includes visible sustainability features (solar PV field on Washburn, green roof with pedestrian promenade, and greenhouses to serve restaurant). These components can be further integrated into the extensive roofs and grand canopies to more prominently showcase these sustainable features. Rather than have the roofs just cover the interiors and provide some recreational space and have the canopies just be a design element and provide shade, the roofs and canopies can significantly showcase and support a range of sustainable features.

Finally, Mohegan Sun submitted a clear presentation that provided a lot of information and was well done.

#### **Everett proposal comments**

*AIA Massachusetts is the consortium of the Boston Society of Architects,  
the Central Massachusetts Chapter of the AIA and the Western Massachusetts Chapter of the AIA*



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The Wynn submission did not provide a lot of design information about what an Everett resort-casino would look like. The professional panel described the submission as “*woefully inadequate*” and said it “*would not even be considered as passing muster in a normal design competition.*”

The panel unanimously concluded that the Everett proposal is not a good design. It would be very disappointing as the sole casino for the Boston area. It is very inward looking, and appears isolated unto itself within the overall context of Everett. The design does not produce a “destination” feel or a draw for the public or tourism.

The Everett design as presented was described at best as “*flat*” and “*uninspired*” and at worst as “*atrocious.*”

The Everett massing and building composition is very poor, with a huge, single, and uninteresting tower that massively overpowers the site and the skyline, on top of a low casino. The program uses (hotel, entertainment, casino) seem too separate.

The design fails to take advantage of the waterfront. Most of the resort-casino is not visually oriented to the water, and a new, short harbor walk that is not connected to the surrounding community is not likely to draw people out to it, especially when the weather is bad (as it will be many months). (An example in contrast is Rowes Wharf design that cuts a grand opening through the building and thus celebrates the waterfront.)

Photos of Las Vegas and Macau interiors were not particularly helpful. Although panelists believe the interior design for Everett would likely be of high quality, based on the proposal materials the panelists had great doubts that the exterior of the complex would be handled with as much care. The submission raised a serious concern about a lack of appreciation and/or an unwillingness on the developer’s part to provide a quality exterior design, which by definition should be site-specific and sensitive to its immediate surroundings and to the nearby urban fabric and appropriately thoughtful in the facility’s massing, layout, program, and circulation.

The Everett building materials were uniformly of lower quality than Revere’s. In particular, the panel believes the proposed exterior materials (EIFS) is a poor choice and will not withstand the combination of: New England temperatures, snow, rain, and humidity; the proximity to the river and nearby salt water; and grit and pollution impacts from nearby manufacturing sites, major traffic routes, and Logan airport. The panel expressed concern that because of this, the facility is likely to look sad and tired in just a few years.

On transportation design, the Everett proposal failed to present a good circulation plan and there was no clear promotion of public transit or pedestrian access. The panel felt the design was unlikely to draw bicyclers.

In sum, the panel felt the Wynn proposal for Everett had major design flaws and shortcomings in all aspects.

#### **Concerns about the proposals.**

The AIA MA panel has these concerns about the Revere proposal:

- a) Night renderings do not provide much information about how the facility would appear in daylight.
- b) Canopies should be specified to be of very high quality materials; they also need to be very well executed in terms of detailing and construction. The canopies are critical; if materials are of lesser quality, if construction is sloppy, or if the cladding deteriorates quickly due to lower quality materials or the impacts of grit and pollution, these primary design elements will lose their positive impacts.



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- c) The Winthrop and Washburn streetscape facades could be improved by making the upper level more interesting, perhaps by adding show windows or other features, and the garage level facade could be improved by adding visible green (sustainable) features or playful umbrella elements.
- d) Will the solar PV field on Washburn work well (given possible shadows)? Why not put on roofs?
- e) The proposal does not realize the full potential of the design to make this a sustainable design showcase.

The AIA MA panel has these concerns about the Everett proposal:

- a) The entire Everett design should be re-thought (massing, waterfront, program uses, circulation, etc.).
- b) A completely revised Everett design should be presented to the Commission, and the submission should include many more details (elevations, sections, renderings, program analyses, etc.).
- c) The building materials should be higher quality and be more resistant to local weather and conditions.

### Recommendations

1. AIA MA recommends the Commission formally establish a Design Review Process for the design and construction of casinos in Massachusetts. This will help ensure the design that the Commission thinks it is approving will not drastically change in the process of design, value engineering, and construction (as designs often do). We recommend the Commission require licenses be conditioned on continued review and approval by the Commission; if at any review, the Commission believes changes are required to the then-current design or construction, and the developer fails to make those changes, then the license awarded to the developer will be suspended or terminated. This Design Review Process would operate in parallel with the local, state, and federal reviews, and would apply to all elements and phases of the casino development. AIA MA offers to assist the Commission in preparing and implementing a Design Review Process.

2. If the Commission awards a license for the Revere proposal, AIA MA recommends: (a) requiring daytime renderings be immediately provided about how the design will appear in daytime and in different seasons to see if any changes should be made in the overall design; (b) requiring design changes be made to address the long blank facade on Washburn Ave. where it is close to homes, to soften edges so as to not overwhelm the neighborhood, and to rethink the services bays (loading docks, truck turnarounds, etc. could be pulled back); (c) demonstrating how the facility can be available as a community resource (to local residents and first responders) in extreme weather events; (d) making the facility a showcase for visible sustainable design by increasing the uses for the extensive roof systems (solar PV arrays, rainwater collection, green roofs, etc.) and providing fun educational info about sustainable elements, incorporating solar PV into the canopy and umbrella designs, and generally making the project a visible demonstration of how well-integrated and interesting the various kinds of sustainability measures can be (they seem largely hidden in the Everett design); and (e) requiring the submission of a detailed and comprehensive maintenance plan to ensure that the facility does not quickly deteriorate.

3. If the Commission awards a license for the Everett proposal, AIA MA recommends: (a) requiring the entire Everett proposal to be redesigned and a new and detailed design package submitted for the Commission's review and comment; (b) requiring an upgrade of the building materials to be much higher quality and to be responsive to local conditions, and requiring the submission of a detailed and comprehensive maintenance plan to ensure that the facility does not quickly deteriorate; and (c) demonstrating how the facility can be available as a community resource (to local residents and first responders) in extreme weather events.

Finally, we note the gaming statute at MGL c.23K, §5(a)(3) requires the Commission to use criteria for evaluation of the application for a license that include "an evaluation of architectural design and concept excellence, integration of the establishment into its surroundings, potential access to multi-modal means of

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EVERETT  
AIA MassachusettsA Chapter of  
The American Institute of Architects

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*transportation, tourism appeal*” as well as an applicant’s financial strength and other criteria. Other sections of the statute also inform the Commission’s evaluation of proposals, such as: Recognizing the importance of the state’s unique cultural and social resources and integrating them in developments shall be “a key component” of a decision on a license (MGL c.23K at §1(7)) and “[P]romoting local small businesses and the tourism industry is fundamental to the policy objectives” of the gaming statute (MGL c.23K at §1(6)).

AIA MA is available to help the Gaming Commission with any questions or follow up about these issues. Please contact John Nunnari at AIA MA (Mass. Chapter of the American Institute of Architects) at 617-901-4685 or [jnunnari@architects.org](mailto:jnunnari@architects.org) for further information or assistance.

AIA MA urges the Commission to create a new model of “a Massachusetts casino” and require excellence in all aspects of design, quality materials, visible sustainability features, and real integration with the community.

Note: These comments were drafted by Julie Taylor, Esq., of Noble & Wickersham LLP, for AIA MA.

-end-

**Bresilla, Colette (MGC)**

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**From:** roger blinn <rblinn45@comcast.net>  
**Sent:** Tuesday, July 08, 2014 7:28 PM  
**To:** MGCcomments (MGC)  
**Subject:** casino

Hi I hope you vote casino at Suffolk Downs. With it being so close to Boston and Logan airport it's the place for it. Not only will create jobs for the area but with the Racetrack you get the best bang for your buck

Thank You  
Roger Blinn

**Bresilla, Colette (MGC)**

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**From:** briannajroche@gmail.com  
**Sent:** Tuesday, July 08, 2014 3:22 PM  
**To:** MGCcomments (MGC)  
**Subject:** My vote - casino in Everett

Good afternoon,

I would like to voice my support for the casino license being awarded to the proposed casino in Everett.

I find the Everett casino to be a better match for Boston, both esthetically and functionally. I am not a gambler, but the promenade of restaurants and shops are very appealing to me, and would make the casino a destination for locals and tourists alike. Developing waterfront property in Boston is always a boon, and I think a casino in Everett would be the way to go.

I hope to speak at the next hearing, but in the event that I cannot attend I hope this letter will be taken into consideration.

Thank you,  
Brianna Roche

**Bresilla, Colette (MGC)**

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**From:** Kristen Mallia <kristen.mallia@gmail.com>  
**Sent:** Tuesday, July 08, 2014 2:30 PM  
**To:** MGCcomments (MGC)  
**Subject:** Massachusetts deserves 5 Star Treatment

Dear Commissioners:

Hello! My name is Kristen Mallia and I would like to tell you that I am in full support of the Wynn Everett proposal. The project will benefit all of Massachusetts in much greater ways than what the other proposal can do. From my point of view, it's simple: Wynn's proposal is the only real choice for the people of Massachusetts.

The applicant you select will have a gaming monopoly in this region, so it is important that Massachusetts protect itself. The Wynn corporation has tremendous financial resources to fund and operate a first-class resort. It will not be asking for bailouts or secret investors, or special tax breaks should the economy dip. This state cannot afford to put taxpayers at risk in any conceivable manner. Wynn has a proven track record.

In closing, I simply ask that you take into account not only the fine reputation and financial strength of Wynn, but Steve Wynn's ability and commitment to get the Everett resort built and open without endless delays. Please approve the best plan and best operator when making this major decision for our state.

Yours sincerely,

Kristen Mallia  
129 Chiswick road #12  
Brighton, MA 02135

**Bresilla, Colette (MGC)**

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**From:** Are Morch <hotelblogger@aremorch.com>  
**Sent:** Tuesday, July 08, 2014 11:58 AM  
**To:** MGCcomments (MGC)  
**Subject:** Mass should be Wynners, not Losers

Dear Commissioners:

I hope the gaming commission will consider all of the facts closely and approve the Everett plan by Wynn Resorts for a state casino license. Wynn's application to build a world-class resort in Everett is the best choice to benefit Massachusetts - by far.

The construction jobs from this development are important. But it is even more important for the gaming commission to weigh the long-term results of this major decision. Year after year, Wynn has been named the best casino resort employer in Las Vegas, where it has scores of competitors. The permanent jobs created by Wynn in Everett will be jobs Massachusetts resident really want and will enjoy. That is an important factor for you to take into account.

I hope you will make this transformative project a reality! We want the Wynn!

Yours sincerely,

Are Morch  
254 Sweetgum Lane  
Tupelo, MS 38801

**Bresilla, Colette (MGC)**

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**From:** Chris Orme <chris.orme123@gmail.com>  
**Sent:** Monday, July 07, 2014 12:59 PM  
**To:** MGCcomments (MGC)  
**Subject:** Public Comment Regarding The Wynn

Dear Commissioners:

Hello. My name is Chris Orme and I live in ashland. I'm sending this letter to mark myself down as one more person who wants to see that Wynn tower rise over the Mystic River. They've got a great plan, and I think it should be approved.

This project would place Wynn Resorts among the Top 5 private employers in Boston. Moreover, this project would generate \$267 million in annual, recurring and local taxes. It also would provide \$183 million in one-time state and local taxes during the resort development.

This is one of the most important decisions to be made for the people of Massachusetts in generations. I am certain that the Wynn plan is the best, and respectfully ask that you award the Boston region license to Wynn Everett.

Yours sincerely,

Chris Orme  
362 eliot st  
ashland, MA 01721

**Bratton-Davies, Marianne (MGC)**

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**From:** Gary Murphy <gmurphy@idgroupae.com>  
**Sent:** Thursday, July 03, 2014 2:01 PM  
**To:** MGCcomments (MGC)  
**Subject:** My opinion;; The Commonwealth is choosing a business partner !

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**Categories:** Yellow Category

I am not a big fan of gambling and don't know much about the two proposals for the Boston casino. What I do know is that the commonwealth has decided to go into the casino business and partner with one firm for the purpose of raising revenue. In the end the decision should come down to who do we believe will be the best partner. I say it this way because we could have run the casino ourselves. But the legislature wisely decided to bring in an expert to run it for us. Regardless of who we choose, Wynn or Mohegan Sun, we get a percent of the revenue.

I know if I had ten dollars to invest my decision would not even be close. Wynn gets my money. He is number one by a wide margin in the most competitive markets in the world. I can only imagine what he can do given the monopoly position in the Boston market. Mohegan Sun has a semi monopoly possession in CT and does not do as well as Wynn even though he has dozens of well funded competitors. Mr Wynn has proven time and time again that he is the best casino operator in the world. Why wouldn't we want the best.

I would partner with Google over AOL. Facebook over Myspace, Apple over Blackberry. In each of these examples I would have to pay a premium to partner with the best. The great thing about your decision is you can get to partner with the best for the same price.

Please put all the talk about site ownership, referendums, racetracks, building layout and other distractions aside. In the end you are choosing a partner for the Commonwealth. Choose the partner who you would personally invest your money with if you had a chance.

Gary Murphy  
Mansfield , MA  
508-339-3375