



City of Boston  
Mayor Michelle Wu

October 10, 2023

Secretary Rebecca Tepper  
Massachusetts Executive Office of Energy and Environmental Affairs  
Attn: Alex Strysky, MEPA Office  
100 Cambridge Street, 9th Floor  
Boston, MA 02114

**Re: East of Broadway (fka Encore Boston Harbor) EEA No. 15060**

Dear Secretary Tepper,

Thank you for the opportunity to comment on the Final Environmental Impact Review on the East of Broadway proposal. Outlined in this letter are concerns and requests specific to the transportation and environmental impacts that this 12.9-acre development project could have.

### **Transportation Impacts**

Few places in Boston rival the Sullivan Square area for the level of public and agency focus on transportation. Between work completed by the MBTA's planned Bus Network Redesign, the recently adopted [PLAN: Charlestown](#), the previously developed Lower Mystic Regional Working Group (LMRWG) [plan](#), substantial development interest across Everett, Boston, and Somerville, and funded infrastructure and operational investments totaling in the billions of dollars, it is difficult to overstate the changes in transportation networks that are expected to come about over the next decade in the immediate area surrounding the proposed project.

In some regards, the East of Broadway proposal includes mitigation measures that contribute to the solutions for regional transportation challenges that converge in this area. However, other portions of the proposal run counter to not only those same mitigation measures, but also economic development and climate priorities that hinge on reducing travel by personal vehicles.

Our transportation comments center on those elements that we feel would significantly strengthen this project both independently and for the region. This would align it with the significant public planning that has been completed and public investment that is proposed or underway. In particular, these comments focus on encouraging more trips to occur by

transit, walking and biking, rather than single occupancy vehicles -- a goal reinforced in both the Everett Transit Action Plan and in Go Boston 2030.

#### *Improving MBTA Transit*

Expanding transit access has been a long term priority for Boston, Everett and the region. We appreciate the proponent's past investment in transit and its willingness to dedicate space and funds to expand current bus and future Silver Line service to the area. Frequent, reliable and enjoyable transit service to East of Broadway and through this corridor is essential for encouraging people to shift from the car to the bus.

As we understand it, the MBTA has requested \$5 million in mitigation for this project to support dedicated bus infrastructure on Broadway. The increased service that the MBTA has called for in its Bus Network Redesign Plan and the potential extension of the Silver Line to Sullivan Square and beyond will both directly benefit the East of Broadway site and represent key investments needed to support the Proponent's mode share goals. We strongly support this request and would encourage the proponent to increase this primary mitigation commitment as there are several recent large development projects in Boston that have provided relatively larger commitments to investing in alternative mode infrastructure.

The transit service, its ridership and the resulting emissions and Vehicle Miles Traveled (VMT) reductions would only improve if it was provided as high quality bus rapid transit (BRT) network, the type of design that the City of Boston is now proposing in Charlestown connecting the planned Broadway BRT directly to the Sullivan Square Station busway. Moreover, developing a BRT corridor here will help improve future Silver Line and/or bus connections to Cambridge or Downtown Boston, which the City of Boston is advancing with its redesign of the Rutherford Avenue/Sullivan Square project which is funded for construction by the Boston MPO.

#### *Expanding Transit Service*

The proponent has a positive track record of providing shared ride options -- by bus and ferry -- for its employees and its guests. Moreover, it has an important plan for additional service as part of this proposal.

Given, however, the expansion of hotel and theater uses proposed for the East of Broadway site, we would encourage the proponent to further expand the services it provides to best meet the travel needs of those guests. For example, in its recently-released PLAN: Charlestown, the City included a proposed Encore-to-Logan Airport shuttle, which modeling results showed a high level of ridership for. Moreover, given the existing limits in late night MBTA service, the City would encourage the proponent to explore a "Night Bus" shuttle service to help fill a relevant service gap of the current transit system.

### *Investing In Connections to Transit*

The final area of recommended transportation investment is the pedestrian and bicycle bridge over the Mystic River to Assembly Square Station, which the proponent has supported. This is an important connection between the Orange Line and both the Northern Strand Trail and the broader Encore campus. We encourage the proponent to work with the Commonwealth of Massachusetts to ensure the design is wide enough to comfortably accommodate pedestrians and cyclists, and support building this critical link quickly. Currently not included in the project is a direct connection from Draw 7 Park over the track infrastructure to the southern headhouse of the Assembly Square MBTA Station. The proponent should commit to working with MassDOT and the MBTA to complete the design of this critical direct connection to the station.

### *Reducing Parking*

With these investments in transit infrastructure, transit service and transit connections, we believe the proponent must further reduce parking from the planned 2,460 spaces. This can reduce emissions, encourage transit trips, and lower project costs.

Of note, 25% of the proposed 2,460 spaces have been added to address parking inefficiency -- drivers using multiple spaces -- and operational inefficiencies -- drivers hunting for parking is a novel approach to parking calculations. This seems to be an unnecessary inflation of more than 500 spaces, beyond what the proponent is projecting for actual parking demand. Not only do these spaces consume a large amount of space, they will contribute to induced demand for additional driving trips and degrade the Proponent's other efforts to meet their mode share goals.

In addition to eliminating spaces added to the supply for "parking inefficiencies," we believe that the baseline number of parking spaces must be lowered even further. In recognition of the finite limits of our roadway systems and intense demand across Charlestown, Somerville, and Everett for future housing and mixed uses in the area, PLAN: Charlestown recommends parking ratios that are half the level proposed by Encore. (See [Page 139](#) of the plan.) We have seen similar and even lower parking ratios to those recommended by PLAN: Charlestown at successful transit-accessible hotel and entertainment venues in Boston.

We also recommend that the Proponent charge "market rates" for all existing and newly created parking. Doing so has been a proven way to reduce excessive demand, and the success of this policy was further supported by the analyses conducted by the LMRWG. Of similar concern is the phasing of the parking, which currently proposes to build the majority of parking in Phase 1. We recommended the proponent design the parking garage structure so that it can be built in phases as future phase new land uses are also built.

### *Supporting Electric Vehicles*

Where new parking is built, we recommend the new parking spaces are built to support the transition to electric vehicles. The City of Boston's requirement for new parking garages is to provide electric vehicle (EV) charging spaces in 25% of the spaces and for the remaining 75% of the spaces to be wired so that they are EV-charger ready. We ask that the proponent meet or exceed that standard for any parking that is ultimately permitted.

### **Environmental & Open Space Impact**

The support of transit and of electric-vehicle charging, as well as the reduction in parking, will help reduce the emissions impact of this project. In addition, however, there are other important environmental and open space impacts we would request that the proponent examine and mitigate, given the scale of this project, its location in a future flood path, and its proximity to local and regional parks.

In particular, the Boston Parks & Recreation Department does not feel that there has been adequate resolution of the impacts of the expanded project to publicly-owned open space, as presented in its six previous comment letters. The proponent has responded to but has not resolved a series of issues documents in the letters below:

- COB letter to MEPA; EEA #15060; NPC; Wynn MA, LLC; December 30, 2022
- BPRD letter to MEPA; EEA #15060; EENF; Wynn MA, LLC; July 23, 2013
- BPRD letter to MEPA; EEA #15060; DEIR; Wynn MA, LLC; February 11, 2014
- BPRD letter to MEPA; EEA #15060; FEIR; Wynn MA, LLC; August 8, 2014
- BPRD letter to MEPA; EEA #15060; SFEIR; Wynn MA, LLC; March 27, 2015
- BPRD letter to MEPA; EEA #15060, SSFEIR; Wynn MA, LLC; August 21, 2015

These open space issues and impacts documented in the letters above remain open and should be fully resolved during review of the expanded development proposed in the FEIR. Moreover, any public benefits that are negotiated for the expanded development should consider the mitigation of impacts to Ryan Playground, Doherty Playground and Sullivan Square as well as proposed publicly-owned open space in Charlestown.

Additional detail on a selection of those concerns are described below.

### *Mitigating the Impact on Adjacent Parks*

The project is approximately 2500' from Ryan Playground and 3500' from both Sullivan Square and Doherty Playground in Boston. Among other impacts, air quality issues may be generated by increased traffic congestion related to the expanded development and increased vehicle trips to this project site.

The Air Quality Environmental Justice Report (FEIR Attachment 4) and the Greenhouse Gas and Mesoscale Analysis (FEIR Attachment 6) did not readily provide the information that has been previously requested specific to Ryan Playground, Doherty Playground, Sullivan Square and other publicly owned open space. Meso-scale analysis of air quality should be provided specific to impacts to Ryan Playground, Doherty Playground, Sullivan Square and other publicly owned open space.

#### *Providing Adequate On-Site Open Space & Public Realm*

The proponent estimates that there will be two million visitors a year to the expanded project, presumably in addition to those to the existing casino (SDEIR response F-28). The open space is conceptual at this point in the plan.

The proponent describes the public realm as follows (SDEIR Response F-31 and FEIR Section 6.2.1): “The Project will create an inviting public realm with generous sidewalks, thoughtful landscaping, and public plazas. Through landscaping improvements, planting of trees, and additional open space, the Project will reduce the urban heat island effect.”

The conceptual description of the public realm does not address the need to accommodate the open space needs of potentially two million additional visitors a year, plus employees - or mitigate impacts.

It is unclear what open space will be provided to serve the expanded development and whether it will accommodate the need of two million additional visitors a year. BPRD has previously requested that an open space needs analysis and impact assessment should be completed. This analysis should estimate the demand for open space; the ability to accommodate those needs onsite; and the reliance on existing public open space including that which is in Boston.

#### *Ensuring a Climate Resilient Complex*

While the East of Broadway site, itself, is not on the harbor, it is at risk to coastal flooding, as shown in the City of Boston’s Climate Ready [maps](#). While this is a longer term risk, it is well within the anticipated life of the buildings being proposed. That flood path reaches the project site, in part, through the adjacent Encore Casino parcel.

We would request that the proponent work with Boston and Everett to develop a plan for how to close this flood path before it poses a likely risk of reaching the project site. Moreover, in its public realm and street design, we recommend the proponent include green infrastructure to capture stormwater from increasingly severe rain events.

Thank you again for the opportunity to comment on this project. We welcome any questions and look forward to the conversation with EOEEA, the proponent and the community.

Sincerely,

*Jascha Franklin-Hodge*  
Chief of Streets

*Arthur Jemison*  
Chief of Planning