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MEMORANDUM

TO: David J. Mohler, Executive Director
Office of Transportation Planning

FROM: J. Lionel Lucien, P.E., Manager
Public/Private Development Unit

DATE: October 10, 2023

RE: Everett – East of Broadway – SFEIR
(EEA #15060)

The Public/Private Development Unit (PPDU) has reviewed the Supplemental Final Environmental Impact Report (SFEIR) for the East of Broadway (EOB) Project in Everett as submitted by Fort Point Associates Inc. on behalf of Wynn MA, LLC (the “Proponent”). The EOB project proposes the construction of approximately 1.8 million square feet (sf) of development with a mix of complementary commercial uses that would include 20,000 sf of event space; 600,000 sf of hotel space; 68,300 sf of food & beverage (F&B) facilities; 52,400 sf of entertainment space; 20,000 sf of retail; 60,000 sf of warehouse; 2,640 new parking spaces, and a 12,500-sf pedestrian bridge over Broadway (“Project”).

The Project is located across from the existing Encore Boston Harbor Casino Resort (EBH) on approximately 12.9 acres of land, which span portions of four blocks between Dexter Street and Beacham Street on the east side of Broadway. The site is currently occupied by vacant parcels and surface parking lots comprising the Lower Broadway Community Lot and a 711-space parking lot spanning several parcels of land between Dexter Street and Lynde Street.

The Project is expected to be built in two phases. Phase 1 includes the construction of a pedestrian bridge, an F&B venue with sports betting, a poker room, a day club, a 999-person occupancy night club, a 200-seat comedy club, and a 979-seat theater for a total gross floor area (GFA) of 165,000 sf. An approximately 740,500 sf parking garage ($\pm 2,133$ parking spaces) is proposed for the Phase 1 development program. Phase 2 consists of 730,000 sf of additional development including hotel, event, retail, and restaurant uses, and 201,300 sf for parking (± 507 parking spaces).

The Project is an expansion of the existing EBH, which opened in 2018. On November 15, 2022, the Proponent filed a Notice of Project Change (“NPC”) with MEPA for the EOB proposal, and, on January 6, 2023, the Secretary of Energy and Environmental Affairs (EEA) issued a Certificate requiring the preparation of a Supplemental Draft EIR (SDEIR) for the Project. On April 26, 2023, the Proponent filed the SDEIR, and the Secretary of EEA issued

on June 2, 2023 a Certificate requiring the preparation of a SFEIR to address several outstanding issues including transportation impacts.

In commenting on the SDEIR, MassDOT recommended that the Proponent continue consultation with the appropriate agencies to address the following issues:

- Revisions needed to the traffic analysis to better reflect queuing and delay at the intersections in the study area;
- Localized improvements necessary at key intersections such as geometric improvements and traffic signal;
- More comprehensive multimodal transportation system improvements included to help reduce congestion in the study area; and
- Reconsideration of the number of parking spaces along with more aggressive transportation demand management (TDM) strategies.

The SFEIR includes an updated transportation section that is generally consistent with the *EOEEA/MassDOT Transportation Impact Assessment (TIA) Guidelines*. Based on the TIA revised analysis, the SFEIR includes an updated mitigation program intended to offset the adverse impacts of the project in the Future Build condition. The mitigation program generally consists of: geometric improvements at the Project's intersection with Broadway; the installation of a pedestrian bridge over Broadway; signal coordination and optimization at several intersections; safety improvements at Sweetser Circle and Alford Street based on prior road safety audit (RSA) recommendations; queue detection on the I-93 NB ramp; land donation along the Project's frontage area and funding to support MBTA transit expansion along the Broadway corridor; a reduction in the number of proposed parking spaces by 452; and further refinements to the TDM program.

MassDOT commends the Proponent for working cooperatively through several meetings and discussions to address the prior comments; update the transportation analysis; and refine the mitigation program. The revised information and analysis address the MassDOT 's key concerns regarding traffic operations in the study area; however, strict compliance with the monitoring program, coordination with the MBTA and the City of Everett, and a commitment to revisit and update the TDM program as necessary are paramount to achieving mobility and the Project's target mode shares along the Broadway corridor. We offer the following comments to guide the permitting process and the post-construction monitoring of the Project:

Study Area Traffic Operations

The SFEIR has reevaluated traffic operations for both existing and future build conditions at several key intersections in the study area, as well as additional intersections and roadway segments that were recommended for inclusion as part of discussions with the Proponent. In the SDEIR, these intersections were shown to experience excessive queues and delays inconsistent with observed traffic operations during field visits or in traffic video camera recordings. These conditions are further worsened with the addition of site traffic

with significant impacts to multimodal travel along the corridor. As a result, MassDOT suggested that other traffic analysis software with a simulation component be considered to better model existing and future conditions in the study area. In consultation with MassDOT, the SimTraffic analysis software was identified as the appropriate tool to conduct the analysis due to its capability to analyze complex multimodal traffic networks by optimizing and simulating signalized and unsignalized intersections.

The Proponent subsequently worked with MassDOT to use SimTraffic to calibrate the roadway network using traffic variables such as roadway geometrics, speeds, and queue lengths which were measured by traffic detectors and traffic video cameras installed at key locations in the study area. The SimTraffic software model did reasonably reproduce the operating conditions in the modeling area but also identified significant congestion in the study area as indicated by the delay and queuing in the network in both existing and future conditions.

Off-site Improvements

To alleviate these conditions, the Proponent proposes to implement comprehensive traffic signal system improvements in the study area. Using SimTraffic, the traffic signal timings were revised and optimized, and the analysis results indicate that future Build conditions would operate at a similar or better LOS and delay condition than the No Build conditions at the intersections along Cambridge Street, Maffa Way, Alford Street, Broadway, and Sweetser Circle. One key concern of MassDOT was the potential queuing of the I-93 NB ramp onto the I-93 mainline, which would impact regional highway traffic. The traffic signal improvements seem to contain the queue within the ramp while maintaining acceptable traffic operating conditions at the I-93 ramp intersection with Cambridge Street. As an added precautionary measure, the Proponent has committed to installing a queue detector on the ramp to prioritize ramp operations if necessary and prevent any queue spillback onto the mainline. We note that these improvements are contingent on approval by both the Cities of Boston and Everett to update and modify the traffic signals at their intersections. The Proponent has indicated that they have coordinated with both cities during the preparation of the SFEIR.

The Proponent has also committed to addressing safety concerns at the intersection of Alford Street with Dexter and at Sweetser Circle based on recommendations from the RSAs conducted at these locations. The Proponent will work with the respective MassDOT district offices to implement some of the low-cost improvements upon review and approval by MassDOT.

Multimodal Improvements

The MBTA currently operates extensive rapid transit service near the site and bus service directly to the site. MassDOT requested that the Proponent identified more aggressive strategies to make the use of public transit more efficient and attractive for commuting to and

from the Project. Accordingly, the Proponent has consulted with the MBTA to update previous analyses conducted in the SDEIR, particularly the methodology used to measure the impacts of the Project on the Orange Line. Although the transit analysis conducted for both the transit and bus system indicate that they would both operate at acceptable conditions per the MBTA Standard Delivery Policy, the Proponent is aware of the MBTA's capital investment plan to improve bus service, including improved passenger information; bus stop accessibility upgrades; bus transit priority; and fleet and facility modernization. The SFEIR references the Bus Network Redesign, ("BNRD"), an element of the MBTA Better Bus Project, which is expected to improve bus service by focusing on high-frequency corridor and improved midday, evening, and weekend service. As part of BNRD, high frequency corridor routes are planned along Broadway and Alford Street in the study area.

To support this effort, the Proponent commits to dedicate right-of-way (ROW) on the east side of Broadway to accommodate a future bus-only lane. This lane is expected to be utilized by the future Bus Routes 109 and 113 identified in BNRD. MassDOT believes high frequency service along this corridor would have a positive impact on transit ridership and provide a viable option for patrons and employees to travel to the EBH and EOB facilities.

In addition, to helping the MBTA advance the bus lane project, the Proponent has committed to provide funding for additional planning, permitting, and design of the dedicated bus lane. MassDOT strongly supports the MBTA's request for the Proponent to provide additional funding to help expedite the construction of the bus lane. The provision of BRT service is critical to maintain or improve transit mobility for the Project's patrons, visitors, and employees within this corridor and would significantly contribute to the Proponent's mode shift efforts.

Key to improving pedestrian conditions as part of the EOB is the provision of the pedestrian bridge over Broadway that would connect the land uses on the site and the parking garage within the EBH site. The bridge would significantly reduce the number of at grade pedestrian crossings on Broadway through parking consolidation and improve operations of the intersection of Broadway and Horizon Way by reducing the amount of time allocated to the pedestrian phase. The bridge would also provide a connection to the future Mystic River Crossing, which is currently in the design phase with the Department of Conservation and Recreation (DCR) and allow pedestrians and bicyclists to travel directly between EBH, the EOB, and the Assembly Row MBTA station thereby making the Orange Line a more viable option to travel to these facilities. The Proponent should continue coordination with DCR to advance this Project as this infrastructure is critical to achieve the targeted overall mode shares included in the SFEIR.

Parking and TDM measures

According to the SFEIR, the Project would now include 2,640 new parking spaces, a 452-space reduction from the SDEIR program. The SFEIR includes parking demand estimates based on the ITE Parking General Manual using independent variables to determine unadjusted parking demand. The number of parking spaces were adjusted based on a combination of internal capture; unmet demand for the EBH facility; accommodation for rideshare service in the parking garage; parking utilization; and operational efficiency factors. The last two factors (operational efficiency and parking utilization) are rarely considered in the *MassDOT/EEA TIA Guidelines* methodology to estimate parking needs; however they are commonly used in parking management to improve operations or customer service. Even with the increase associated with these two factors, the Project would result in a net overall decrease in the number of parking spaces. MassDOT is encouraged by the proposed reduction in the number of parking spaces.

We note however that consistent with most gaming facilities, the transportation analysis for both the EBH and the EOB projects have identified trip generation and distribution patterns that lead towards higher automobile mode of travel than other alternative modes. In fact, the annual transportation monitoring reports for the EBH project have so far documented trip generation numbers than projected, and the existing EBH parking garage is frequently at capacity. While we continue to encourage the Proponent to reduce parking to encourage mode shift; we understand that it is also important to right-size the amount of parking spaces and ensure any shortage of parking does not result in an increase of rideshare trips, which could then exacerbate traffic operations at the Project's site drive on Broadway and spillback to nearby intersections.

The Project is expected to be built in two phases with 2,137 parking spaces in the first phase and the balance in the second phase. Given that the EBH and the EOB projects are subject to annual monitoring to ensure that the target mode shares are met, MassDOT would recommend that the Secretary of EEA condition the construction of additional parking spaces for Phase 2 on the Proponent's meeting the mode share targets and that there is a demonstrated need for additional parking to accommodate site trips.

The SFEIR includes a comprehensive mitigation program based on the EBH program currently under implementation. The TDM program is designed to assist the EOB in meeting the set target modes. As part of the TDM program, the Proponent proposes to subsidize the minimum of 60% of the cost of MBTA passes for employees. While this is commendable, we believe that the Proponent should provide full subsidy of the cost of MBTA passes for employees to create a mode shift significant enough to achieve the set target mode shares. The infrastructure improvements currently plan for the area provide a unique opportunity for the Proponent to encourage a modal shift by maximizing incentives for employees and finding creative ways for patrons to consider other options than driving.

Conclusion

MassDOT recommends that no further environmental review be required based on transportation issues. We do not believe further analysis is required; however, monitoring and updating the TDM program is an integral part of the success of the proposed mitigation plan as some of the multimodal infrastructure proposed by the Proponent and others have evolved over time. Accordingly, MassDOT would like to see some revisions to the Section 61 Finding to address the following:

1. A clear commitment to not proceed with the Phase 2 component of the Project and to file a Notice of Project Change to identify appropriate additional mitigation if the mode share targets for the EBH project and the Phase 1 EOB are not met.
2. A commitment to fully subsidize MBTA passes for employees to encourage mode shift to transit. At a minimum, this commitment should be provided if the target mode shares are not met following the first monitoring report.
3. A clear commitment to consult with MassDOT on the methodology and metrics to measure target mode shares.

The Proponent should continue consultation with MassDOT, the MBTA, the Cities of Everett and Boston to update the draft Section 61 Finding, which will be the basis for MassDOT to issue the final Section 61 Finding for the Project. If you have any questions, please contact me at *Lionel.Lucien@dot.state.ma.us*.