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Secretary Stephanie Pollack  
Massachusetts Department of  
Transportation  
Ten Park Plaza, Suite 4160  
Boston, MA 02116

**Subj: Independent traffic impact study for Everett – Wynn Resort Casino (MEPA No. 15060)**

Dear Secretary Pollack,

I write to thank you for inviting my staff to meet on June 22 to discuss our concerns regarding the local and regional traffic and transit impacts of Wynn MA, LLC's proposed resort casino (Casino) in Everett. We agreed at that meeting to follow up, and we take this opportunity to reiterate our views on how those concerns should be addressed. Our goal is to ensure that the environmental review for the Casino project is consistent with the requirements of the Massachusetts Environmental Policy Act (MEPA), and in particular, that all necessary data are taken into account to facilitate a full evaluation of alternatives, impacts, and necessary mitigation measures.

As you know, the Commonwealth has only one chance to analyze traffic and transit impacts properly and develop a workable plan to mitigate harms to commuters and residents. Once the Casino is constructed and local roads are modified, they are unlikely to be meaningfully altered if traffic and other transportation problems worsen. For that reason, it is imperative that the Commonwealth use the best tools at its disposal to analyze the traffic impacts associated with the Casino.

We have significant concerns that the traffic study the Administration will consider during this process is being conducted by Wynn's own consultants. For this project, that approach is insufficient. We believe it is critical that MassDOT and the Commonwealth benefit from an independent analysis of the traffic impact, paid for by Wynn, before considering any mitigation measures.

In our view, it is not only appropriate, but necessary, that the analysis for MassDOT employ the Boston Region Metropolitan Planning Organization's Central Transportation Planning Staff (CTPS) regional travel demand model, as would be typical in the case of other regionally significant projects. While we recognize that MassDOT normally uses the CTPS model only for its own projects, the magnitude of the Casino's impact in this very densely populated urban area and on the vital transportation networks that serve it and the region makes it akin to the types of projects for which MassDOT would routinely use CTPS modeling and therefore justifies its use here.<sup>1</sup> We urge

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<sup>1</sup> As proposed and licensed by the Gaming Commission, Wynn has estimated that the Casino will generate 31,844 new average daily vehicle trips on a weekday (20,130 when adjusted for mode share) and 37,916 new average daily vehicle trips

MassDOT not to endorse a MEPA certificate for the Wynn Casino until CTPS has modeled realistic alternatives, and Wynn develops a regional traffic mitigation plan based on this independent analysis.

The Casino will impact residents well beyond the immediate vicinity of the facility. Chief among our concerns are local traffic impacts on the North Washington Street Bridge, Rutherford Avenue and Sullivan Square in Boston, and Assembly Square and Union Square in Somerville, and regional traffic impacts on I-93. Those impacts stand to threaten the local economies, redevelopment plans, and air quality of affected communities. In particular, like your Office and the Executive Office of Energy and Environmental Affairs (EEA), the Attorney General's Office is very concerned that traffic impacts from the Casino as proposed will be entirely incompatible with the City of Boston's previously-approved plans for the North Washington Street Bridge, Rutherford Avenue and Sullivan Square. We believe careful consideration of that issue now is essential to an effective MEPA process. In our view, Boston's pre-existing plans represent an alternative that the CTPS model should incorporate and which Wynn must analyze fully in its Second Supplemental Environmental Impact Report (SSFEIR) to conform with MEPA.

As your Office and EEA have called for in prior communications during the MEPA process, we agree Wynn must develop a mitigation proposal that also will accommodate existing traffic, increased traffic due to planned projects in Somerville, and anticipated increased Casino-related traffic. We strongly urge your Office to insist on a multi-stakeholder process to develop a viable, comprehensive, and funded transportation mitigation plan even if some parties decline to participate.

Our responsibility to protect the public necessitates completion of a process that is thorough, collaborative, and transparent. We believe that starts with getting the best possible data regarding the traffic impacts, and then using that to formulate a workable mitigation plan. In our view, the Casino should not move forward without such a plan in place.

We greatly appreciate the opportunity to express our position on these issues and look forward to working together to address our shared concerns. You can reach me directly or contact Richard Johnston, Chief Legal Counsel, at 617.963.2028.

Sincerely,



Maura Healey

cc:

John Englander, General Counsel, Massachusetts Department of Transportation  
Matthew Beaton, Secretary, Executive Office of Energy & Environmental Affairs  
Ned Bartlett, Undersecretary, Executive Office of Energy & Environmental Affairs  
Kate McKeever, General Counsel, Executive Office of Energy & Environmental Affairs  
Catherine Blue, General Counsel, Massachusetts Gaming Commission  
Deirdre Buckley, Director, MEPA Office, Executive Office of Energy & Environmental Affairs

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on a Saturday (23,982 when adjusted for mode share). As you know, these new vehicle trips will be on top of existing traffic levels that already often cripple travel in and around Sullivan Square and have secondary adverse effects on I-93.