



Navigating our future.

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Via email: mgccomments@state.ma.us

April 11, 2016

John S. Ziemba
Ombudsman
Massachusetts Gaming Commission
101 Federal Street, 12th Floor
Boston, MA 02110

Re: Wynn Resort in Everett Draft Section 61 Finding

Dear Mr. Ziemba,

On behalf of Boston Harbor Now (formerly The Boston Harbor Association), thank you for the opportunity to comment on the draft Section 61 Finding for the Wynn Resort Project. Boston Harbor Now has commented extensively on the original project, Supplemental FEIR, and Second Supplemental FEIR. We continue to strongly support the proponent's commitment to funding water transportation initiatives as a contribution to build a more comprehensive Boston Harbor ferry system. Our comments follow.

Commitment to Water Transportation Initiatives

In 2012, MassDOT created the Ferry Compact, an executive-level committee of water transportation stakeholders focused on developing "financially and environmentally sustainable ferry services." In recent years, water transportation services between Boston and the North and South Shores have increased for both commuters and recreational riders. Nonetheless,

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water transportation continues to be an underused opportunity to stretch our public transit dollars and ease Boston's traffic problems.

For example, the MassDOT Section 61 findings do not even assess the impacts of water-based public transit options including water taxis, a scheduled ferry system, and water shuttles to and from major land-based MBTA stops. This should be a higher priority for MassDOT, the MBTA, and the Commonwealth. Water transportation has the potential to significantly improve public transit options for underserved Boston Harbor waterfront communities such as Everett.

Currently, Boston Harbor's existing ferry routes receive the lowest subsidies of any form of public transit in the MBTA system. To create a successful and viable ferry system, ferries must be seamlessly integrated with land-based services and benefit from on-going predictable subsidies, similar to buses, subways, and trains. Customers should be able to experience all public transit modes as part of the same system.

A strong commitment from developers to provide dedicated funding to water transportation is essential to expanding, completing, and maintaining operation of the ferry system. The mitigation funds committed by Wynn Everett should be used to help complete Boston Harbor's ferry infrastructure.

Proponent Support for Water Transportation

As part of the Draft Section 61 Findings, Wynn has committed \$8.6 million to provide dock facilities and customized ferry vessels able to traverse under the Alford Street Bridge and operate between the project site and Downtown Boston destinations (page 4-20 of SS FEIR).

Wynn has committed to providing an additional mitigation measure of up to \$3,303,000 per year for the operation of water shuttle service to the project site, an annual operating cost that will be required for the term of the project (page 4-18 of SS FEIR). In response to our previous comments inquiring about funds needed to maintain a viable transportation system, the proponent confirmed that it is committed to providing the water shuttle service, not the particular annual cost.

We strongly urge that the fare for the water shuttle service be consistent with that of scheduled MBTA ferry service, particularly if on-site parking rates for guests are relatively low. The proposed water shuttle service should be operated as a regularly scheduled ferry, not as on-demand taxi or water taxi services.

Finally, we ask that it be made clear that the proponent's minimum subsidy of \$3,303,000 will be used to provide frequent service with headways of at least 15 minutes, seven days a week.

Otherwise, the proponent's commitment of up to \$3,303,000 per year for service operation may result in a curtailed, infrequent schedule or a very expensive service (\$15 or more per ride) limited to a small number of high-end visitors.

Improved Connections from MBTA Orange Line


MassDOT has stated that public transit access to the project via the MBTA's Orange Line is a key component to the project's transportation strategy. We agree. On previous occasions, Boston Harbor Now has advocated for a ferry service between the dock by the MBTA Assembly station on the Orange Line and the project dock to help reduce road congestion by bus from the station to the project site.

With an estimated 5 to 7 minute boat ride, this proposed connection has the potential to reduce and eliminate the need for bus shuttle service from the Wellington and Malden Center stations on the Orange Line to the project site. As part of the mitigation plan to facilitate patron shuttle connections between the two stations to the project site, Wynn Everett has proposed an annual \$3,285,000. This connection would use smaller vessels than the customized ferry vessels to and from the Inner Harbor, with the added benefit of further activating Everett's water sheet.

Boston Harbor Now continues to push for smart investments towards a viable Boston Harbor ferry system. Water transportation alternatives require lower overall subsidies than other forms of mass transit and can significantly improve commuter links, relieve traffic congestions, and encourage further transit-oriented development. Wynn's commitment to water transportation is an excellent investment in bringing Boston's water transportation to scale. The city should continue to support the completion of ferry service as an option for traffic demand management.

Thank you for the opportunity to comment. We look forward to the inclusion of water transportation alternatives for this project and a fully connected and viable Boston Harbor ferry system.

Sincerely,



Jill Horwood

Waterfront Policy Analyst



Julie Wormser

VP of Policy and Planning