



August 21, 2015

Matthew A. Beaton, Secretary
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office, Anne Canaday, EEA No. 15060
100 Cambridge Street, Suite 900
Boston, MA 02114

Re: EEA 15060. Wynn Everett SSFEIR

Dear Secretary Beaton:

The Mystic River Watershed Association (MyRWA) appreciates this opportunity to comment on the Second Supplemental Final Environmental Impact Report (SSFEIR) filed for the proposed Wynn Resort Casino in Everett, Massachusetts. The SSFEIR was submitted to the Secretary by Wynn MA, LLC on July 15, 2015, in response to the Secretary's SFEIR Certificate issued April 3, 2015.

The Mystic River Watershed Association is a 501(c)(3) nonprofit organization founded in 1972 by a group of concerned citizens. MyRWA's mission is to protect and restore clean water and the natural environment to a healthy state in the basin's 22 communities and to promote responsible stewardship of our natural resources through educational initiatives. A small organization, MyRWA accomplishes its mission by forging links with citizen's groups, universities, businesses and government agencies. These alliances permit MyRWA to work throughout the watershed, documenting current conditions and advocating for resource management and protection. This collaborative approach has created a strong watershed voice and is helping to attract much-needed public and private resources to the Mystic.

MyRWA has submitted comments to the Secretary on previous filings by the proponent. See our letters dated March 27, 2015 (SFEIR), August 7, 2014 (FEIR) and February 11, 2014 (DEIR). MyRWA has emphasized throughout the MEPA process that, given the scale and scope of the proposed Resort Casino and its location on the banks of the Mystic River, the Proponent has an extraordinary opportunity to make a significant contribution to the revitalization of the Mystic River waterfront and the restoration of natural habitat and water quality conditions in the river. We are happy to see, based on the plans for development provided to date, that the Proponent has embraced this opportunity and shown an ability and willingness to provide leadership to efforts to restore the Mystic River to a healthy, safe and accessible condition.

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As an environmental organization, MyRWA is particularly attuned to how development projects will improve existing conditions within the highly urbanized communities of the Mystic River Watershed. MyRWA recognizes that the proposed project will accelerate the cleanup of a damaged ecosystem, including restoration of a heavily contaminated waterfront site on the main stem of the Mystic River.

Such restoration of a keystone parcel in the Mystic River watershed has the potential to make a significant difference to water quality and natural life in the watershed and in the life of watershed communities.

We hope the Proponent will continue to provide innovative leadership to promote restoration of the natural environment and open spaces of the Mystic River watershed. In support of those efforts, MyRWA offers the following comments on issues within the Scope of the SSFEIR.

Salt Marsh and Tidelands Restoration

MyRWA applauds the Proponent's restatement of its commitment to salt marsh and coastal bank restoration and marine resource conservation and improvement, in response to comments by our organization and the Department of Environmental Protection (DEP) and the Division of Marine Fisheries.

Wynn's revision of its original plans for a sea-wall provides great benefit to river ecology. The current approach will restore the degraded coastal bank into a "living shoreline" along the Mystic River, including a vibrant salt marsh and native vegetation. This work will serve as a model for this type of restoration throughout the Mystic River watershed.

We also acknowledge the Proponent's positive responses to comments by EEA, DEP and the Massachusetts Water Resources Authority regarding stormwater mitigation. This will further enhance restoration efforts.

Remediation and Site Contamination

The former Monsanto site in Everett, has long been a large, contaminated, industrial site requiring substantial financial resources for remediation. The Wynn project has the resources to accomplish its plans and will exceed the capping and monitoring of prior proposals and will dredge and remove contaminated soil and sediment.

Open Space

The project's site design sets construction away from the Mystic River allowing for six acres of vegetated open space along the river, accessible for public events and recreational use. Included will be the construction of a 20 foot wide public harborwalk for pedestrian and bike access, including easements extending the harborwalk onto two adjacent sites connecting to a DCR park. MyRWA appreciates the Proponent's commitment to facilitate new modes of public access to the project site and waterfront, including bicycle travel.

Visitor Parking

MyRWA notes that the Proponent's revised project plans will reduce the amount of below-grade parking and total number of available parking spaces. Based on the Proponent's assurances that there will remain ample parking for short-term visitors seeking access to the open spaces, as well as its avowed support for improved Orange Line access, we believe that this change is consistent with the goals of environmental health and improved public access to the adjacent waterfront. [See SSFEIR's response to MyRWA comments regarding ample free parking for access to open space, p. 5-90 (pdf. P.297 of 1032).



Although the revised plans will actually reduce the number of available parking spaces, Wynn states there remain 570 more spaces than estimated peak patron parking demand. The proponent further argues this peak demand is unlikely to coincide with short-term open-space visits. This is plausible, but the proponent does not expressly state that the parking will be free to visitors of the public open space on site. Perhaps this has been stated elsewhere but MyRWA believes it is important that free parking for short term visitors to the public open space is explicitly included in these plans as a condition of the permit.

Additional Mitigation

Observing that the Proponent's most recent adjustments to its development plans, as reflected in the SSFEIR, will increase both the building's footprint and the volume of material to be dredged to accommodate water transport, we ask that the Proponent give early attention to the potential environmental effects of these modifications and provide any needed mitigation, thereby demonstrating its continued commitment to waterfront restoration and watershed health.

Summary

Broadly, our organization is very encouraged by the Proponent's approach to site remediation, planning and design and by the stated commitment of the Wynn Resorts development team to set high standards of excellence with regard to environmental protection and restoration. MyRWA will continue to monitor the proposed project as it moves forward and will remain in contact with the Proponent and relevant authorities during preparation and review of all other federal, state and local permit applications. Thank you for this opportunity to comment on this significant project proposal. If you have any questions or require additional information please contact me at (781) 316-3438 or at EK@mysticriver.org.

Sincerely,

EkOngKar Singh Khalsa, Executive Director
Mystic River Watershed Association

cc: Jamie Fay, Fort Point Associates
Massachusetts Gaming Commission
Mayor Carlo DeMaria, Jr.
Everett Planning Board
Everett Conservation Commission
Mass Audubon
Environmental League Massachusetts

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