January 9, 2015

Secretary Matthew A. Beaton
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
[Holly Johnson], EEA No. 14924
100 Cambridge Street, Suite 900
Boston, MA 02114

Re: EEA #14924: Project First Light Destination Resort Casino, Taunton, MA
Final Environmental Impact Report (FEIR)

Dear Secretary Beaton:

Old Colony Planning Council (OCPC) has reviewed the Final Environmental Impact Report (FEIR) submitted for the Project First Light Destination Resort Casino (EEA #14924) in Taunton. The Mashpee Wampanoag Tribe is proposing to develop a destination resort casino, hotel, parking, and other support facilities on a 151 acre site in Taunton. The proposed project site is located within and adjacent to the Liberty & Union Industrial Park (LUIP) off of Stevens Street east of the Route 24/140 interchange in East Taunton. On behalf of the Old Colony Planning Council, we thank you for the opportunity to comment on this proposal and offer the following for your consideration.

Alternatives Analysis
The Preferred Alternative: Alternative A, calls for the construction of a 400,000 square-foot gaming facility that will feature 4,400 gaming positions, three-300 room hotels, and events center, fine dining, a 24 hour restaurant, an international buffet, a food court, retail stores, a 25,000 square-foot water park, a 4,486-space parking garage, and approximately 1,171 surface parking spaces. Alternative B: Reduced Intensity 1 reduces the scale of the project to include the construction of a 195,000 square-foot casino that will feature 2,300 gaming positions, one 300 room hotel, an international buffet, a food court, retail stores, a 25,000 square-foot water park, a 2,686-space parking garage, and approximately 1,171 surface parking spaces. Alternative C: Reduced Intensity 2 still includes the development of the project site, but would be reduced in intensity from Alternative A. The phased development of Alternative C would be the same as that of Alternative A, but would eliminate one of the 300-room hotels, the proposed water park and 500 surface parking spaces. Alternative D: No Action assumes that the parcels on the project site would continue to develop to their capacity as allowed by current zoning.

Planning Consistency
The proposed project is consistent with the 2000 OCPC Regional Policy Plan: A Guide for Shaping Our Communities and the OCPC Region as it commits to building a sustainable development that utilizes a number of energy efficiency measures and minimizes its footprint on the natural environment to the greatest practical extent feasible. OCPC recommends that the project proponent continue to work closely with the City of
Taunton, State Permitting Agencies, and all interested parties to ensure that the impacts associated with the proposed project are appropriately mitigated.

**Wetlands**
I applaud the project proponent for making a number of improvements to the overall design and layout of the project since the publication of the DEIR that result in substantially less wetland resource area impacts and greater preservation of the riparian corridor along the Cotley River. While the number of onsite wetland impacts has been greatly reduced by the updated design and layout, I remained concerned with the increase of the number of off-site wetlands impacts associated with the project’s new design and layout. As such I urge the proponent to continue to work with all applicable local and state partners to mitigate the increased offsite wetlands impacts to the greatest extent feasible.

**Stormwater Management**
The project proponent has committed to follow MassDEP standards as it pertains to stormwater management and will incorporate a number of Low Impact Development (LID) Best Management Practices (BMP) approved by MassDEP. These BMPs are designed to remove pollutants from stormwater prior to its discharge to downstream surface waters. An example of the BMPs that the project proponent has committed to using and/or upgrading include deep-sump catch basins with hooded outlets, extended detention basins with sediment forebays, water quality swales, and bioretention areas among others. The proponent has also committed to using grey water and retained stormwater for the irrigation of onsite landscaping. While the proponent notes in the FEIR that the use of permeable pavements on surface parking lots may not be cost effective, we encourage the project proponent to continue to investigate the use of permeable pavements throughout the project area, where applicable.

**Sustainability**
To reduce the environmental impact of the project to the greatest extent possible, OCPC commends the project proponent for utilizing a number of sustainable development principles, such as the reuse of asphalt, brick, and concrete and other suitable demolition debris on-site as a base material in parking lots, the use of a number of energy and water conservation measures and a commitment to build the casino to the equivalent to LEED Gold. We continue to strongly urge the proponent to utilize renewable energy sources in the final design phase of the project and consider such sources as solar photovoltaic, solar hot water and combined heat and power sources of energy.

**Transportation**
The FEIR contained a transportation section that primarily focused on the existing and future traffic conditions, intersection and roadway safety, public transportation conditions, bicycle and pedestrian accommodations, and aviation activity. The report included a lengthy future traffic conditions section, which described anticipated traffic operations for the following four alternatives: Alternative A – Preferred Alternative, Alternative B – Reduced Intensity I, Alternative C – Reduced Intensity II, and No-Build. Overall, the transportation section of the FEIR included a great deal of traffic analysis and mitigation; however, it fell short of providing a full mitigation package of Route 24 in order to accommodate the popularity of the proposed project.

**Changes from the DEIR Affecting Transportation**

According to the FEIR, concerns had arisen during the DEIR comment period regarding the proximity of the water park and ancillary facilities on the northern portion of the site to the nearby wetlands and potential habitat. In addition, there was concern about the crossing of the Cotley River that would be required to access
two surface parking lots located near the western edge of the site adjacent to Route 24. As such, the project proponent changed the layout of the water park and orientation of ancillary facilities, and the two aforementioned surface parking lots were removed, which eliminated the direct impacts to wetlands on the site and reduced the total impervious surface area.

In addition, the DEIR considered two options to provide access and egress to the proposed project site. Option 1 involved the construction of a new ramp from the intersection of O'Connell Way and Stevens Street onto Route 140 Northbound while Option 2 did not include this ramp and instead provided a wider cross section on Stevens Street to accommodate additional turn-lanes to access Route 140 Northbound. In response to the comments from the Army Corps of Engineers and MassDOT, Option 1 was eliminated from further consideration, and the FEIR includes only the analysis of Option 2.

**Route 24**

Route 24 will be the primary route used by patrons and employees wanting to access and leave the proposed project. The transportation section of the FEIR continually demonstrates the current deficiencies of Route 24 and its interchanges. Specifically, the Route 24 southbound lane drop just south of Interstate 495 is a bottleneck area where traffic consistently queues up during the afternoon commute. The majority of traffic accessing the proposed project will be attempting to do so during this time period and in this direction; therefore, significant improvements to this facility should be part of the mitigation package for the proposed project. The proponent has committed to widening Route 24 southbound to three lanes from the Hart Street overpass to the Route 140 interchange; however, that widening should be extended north to where Route 24 narrows from three lanes to two lanes.

Upgrading Route 24 to interstate standards has been an issue in the region for decades. In 1998, MassHighway completed a study to examine the geometric improvements necessary, along with the estimated costs, associated with upgrading Route 24 to interstate highway standards. Route 24 was constructed in the 1950s to the design standards of that time, although some reconstruction has occurred since then to improve deficiencies. According to the MassHighway study, Route 24 does not meet design standards of an interstate highway; specific deficiencies identified were inadequate acceleration and deceleration lanes on ramp exits and entrances, shoulder width and vertical clearance requirements. The study stated that improving Route 24 to interstate standards involves widening shoulders for safety, replacing overpass bridges to accommodate higher vertical clearances, and reconstructing ramp entrances and exists to higher acceleration and deceleration design standards.

As such, we continue to strongly urge the proponent to add capacity to Route 24 between Interstate 495 and Route 140; and, at a minimum, commit to continuing to work with MassDOT and the regional planning agencies (OCPC and SRPEDD) to accomplish a full interstate standards upgrade for Route 24 in the future.

**Public Transportation**

Future public transportation connections are an important component for this proposed project. Large public transportation vehicles are harder to maneuver, require more space, operate on their own schedule, and therefore, require different provisions than a passenger motor vehicle. The FEIR included numerous items directed towards promoting public transportation to and from the site such as, providing an on-site Transportation Center, running shuttle services to and from the Bloom Bus Terminal and the Silver City Galleria, as well as conducting a six-month trial with a local bus provider to run two trips each Friday and Saturday to Providence and South Station in Boston. The proponent has demonstrated a commitment to public
transportation and should continue to coordinate with the Regional Transit Authorities (Brockton Area Transit Authority (BAT), Greater Attleboro Taunton Regional Transit Authority (GATRA), and Southeastern Regional Transit Authority (SRTA)) to improve upon the conceptual designs, discuss potential service enhancements, and to plan for potential fixed route interconnectivity. The Region faces many of the challenges found across the nation, such as the increasing demand for transit capacity across all modes, the increased costs of operations; and the increased demand for paratransit services and the coordination of human service transportation efforts. All these challenges are combined with the perhaps greatest of all; shrinking funding sources for public transit. Therefore, a public/private partnership is essential in order to ensure a successful public transportation service to the proposed project.

**Bicycle and Pedestrian Accommodations**

The FEIR included a brief section on bicycle and pedestrian improvements in Section 14 – Mitigation and Proposed Section 61 Findings. It included items such as providing secure storage areas for at least 20 bicycles in the main casino garage, providing sidewalks with a minimum width of five feet on internal site roadways, signaling and providing crosswalks at the site driveway, and, designing off-site mitigation locations to accommodate pedestrians and bicyclists. One such design element includes a shared-use path on the south side of Route 140 between Mozzone Boulevard and the Silver City Galleria. These elements will certainly help with bicycle and pedestrian travel to and from the site; however, only designing off-site mitigation locations puts the burden of providing multi-modal access on others rather than on the project proponent. Clearly, this type of project creates significant challenges related to providing bicycle and pedestrian accommodations to and from the site. Therefore, it seems evident that the proponent should not only design, but also construct any and all off-site bicycle and pedestrian accommodations deemed appropriate by MassDOT and the City of Taunton.

**Transportation Demand Management**

Section 14 of the FEIR described a robust Transportation Demand Management program aimed at reducing the number of single occupancy vehicle trips to and from the project site. The proposed TDM program include elements such as: setting modal split goals for the casino, establishing carpool and vanpool programs for employees, providing preferential parking for employees who ride-share or drive hybrid vehicles, including electric vehicle charging stations in the parking garage, and, designating an on-site TDM coordinator. These items will certainly help make reduce the vehicle demands of the proposed project. As such, I encourage the project proponent to track and publish the results of each component of the TDM annually so that adjustments can be made if necessary.

**Conclusions**

Considering the fact that this type of project will be new to the Commonwealth and is expected to attract visitors from all over the Northeast, it is crucial that the related impacts (water use, wastewater generation, stormwater and transportation) be reviewed thoroughly before the issuance of permits. The traffic impacts related to this project in particular may not be fully apparent following the first opening of the facility; therefore a commitment from the proponent to continue working with MassDOT, the host community, the surrounding communities, and the regional stakeholders to ensure that all issues are addressed is important.

We thank you for the opportunity to comment on this project to ensure that it accomplishes its objectives with minimal environmental and transportation impacts and look forward to reviewing any and all future filings.
Sincerely,

Pasquale Ciaramella
Executive Director

cc: Governor Charles D. Baker
Federal and State Legislators
OCPC Region Chairs, Chief Elected Officials
OCPC Region Chairs, Planning Boards
OCPC Delegates and Alternates
Mr. Stephen Crosby, Chairman, Massachusetts Gaming Commission
Mr. Stephen C. Smith, Executive Director, SRPEDD
MassDOT Board of Directors
Mr. Francis DePaola, P.E. Acting Secretary and CEO, MassDOT
Dr. Beverly A. Scott, Ph.D., General Manager, MBTA & MassDOT Rail & Transit Division Administrator
Ms. Jean Fox, South Coast Rail Project Director, MassDOT
Ms. Mary-Joe Perry, Director, MassDOT District 5
Mr. Lionel Lucien, Public/Private Development Unit, MassDOT
Ms. Sreelatha Allam, MPO Liaison, MassDOT Planning
Mr. Reinald Ledoux, Jr., Administrator, BAT
Mr. Frank Gay, Administrator, GATRA