



May 14, 2013

Secretary Richard K. Sullivan, Jr.
Executive Office of Energy and Environmental Affairs (EEA)
100 Cambridge Street, Suite 900
Boston MA 02114

RE: Comments on the MGM Springfield Environmental Notification Form
EEA #15033

Dear Secretary Sullivan:

WalkBoston has reviewed the Environmental Notification Form for the MGM Springfield proposal and offers the comments below.

The proposal includes a 592,000 square foot casino resort that includes retail/restaurant uses and banquet facilities in addition to gaming space. Adjacent to the casino will be a 294-room hotel, 54 residential units, and a 140,000 SF retail and entertainment center to be known as Armory Square. A 4,800 space on-site parking garage will be provided.

MGM Springfield is located at the heart of downtown Springfield, immediately adjacent to the historic Court Square Park, City Hall, Symphony Hall and the Hampden County Courthouse and very near the Mass Mutual Exhibition Hall. Much of the proposed site itself is currently occupied by parking lots.

The large block of land contained within the site, originally three rectangular city blocks, will be physically joined by the removal of portions of the two streets reaching between Main Street and East Columbus Avenue. The land occupied by the streets – Howard Street and Bliss Street – will be incorporated into the site. These two streets will be kept open near East Columbus Avenue, to provide access for uses not incorporated into the site and for additional means of access and egress for the on-site garages. The major entrances and exits to the site's garage facilities are focused on East Columbus Avenue, Bliss Street and State Street. State Street and Bliss Street are connected directly to I-91 exit and entrance ramps via East Columbus Avenue and West Columbus Avenue. Union Street is a bit more difficult for vehicular connections from the expressway, as it is a one-way street westbound. However, it is well situated as an egress facility from the site, using the full interchange with I-91 that exists at the end of the street where it intersects with East Columbus Avenue and West Columbus Avenue. It is also well connected to Main Street. Union Street is the principal access to the proposed Armory Square Shopping area and to the large multi-level on-site garage. On-site service will be handled primarily along Union Street.

The Downtown Location of the project is important

By locating this project in the heart of downtown, the development may set the stage for new pedestrian activity, particularly along Main and State Streets. The project buttresses the existing downtown on an important and underused edge, and adds a potentially exciting and revitalizing use to supplement present downtown activities. Its presence should become the basis for walking throughout the downtown area. The proposal raises

some questions that warrant exploration as it proceeds into further design development:

- The street edges along Main and State Streets should be carefully developed to encourage pedestrian activities. The proponent has begun this process, indicating in the preliminary drawings that some of the sites along those streets will be restaurants. Restaurants are a particularly good example of building occupants that can both face the street and the interior of the site, and a casino can take good advantage of their use at its peripheries. Restaurants can also incorporate sidewalk cafés that enliven the sidewalk and make it more interesting for walkers. Sidewalks should be wide enough to encourage walking and make it a pleasant experience.
- Buildings that border major streets can also encourage additional development along that street. For example, along Main Street both east and west of the site, new development opportunities are likely to be bolstered by the presence of the casino. The existing structures across Main Street facing the casino property, will be directly impacted and could offer sites for potential new businesses. In turn, the casino will benefit from the presence of people that the new businesses may bring in.
- The proposed Armory Square shopping and entertainment complex immediately adjacent to the casino affords considerable opportunities for attracting pedestrians. The preliminary proposal calls for a multi-screen cinema and a bowling alley, both of which seem to be compatible with the casino development. However, the site also has a great deal of retail space that seems disconnected from both the casino and city streets.
- The preliminary drawings provided in the ENF show surface parking surrounding the shopping and entertainment complex that will diminish its attractiveness as a place for walkers. The two parking lots will cause vehicles to move through the site, circling to find a parking space near the casino and other uses. Perhaps the parking lots could be reconfigured into one lot that faces Union Street, or better yet be incorporated into the garage and create an opportunity for a truly pedestrian-oriented shopping and entertainment complex.
- Sidewalks in the shopping and entertainment complex appear very narrow and in some places non-existent. Special effort should be given to create a 21st century shopping area that does not repeat customary mall-like developments that are centered around cars and parking.
- The drawings indicate a plaza where the shopping/entertainment uses meet the casino itself and where special events can occur. This plaza may be attractive, but could be made more attractive by ensuring that vehicles do not use it. The area should be reserved specifically for walkers to gain access to specific sites within the complex or simply want a breath of fresh air. A full or partial roof over the plaza would help make it more attractive year-round.

Pedestrian access at the edges of the site

Main Street forms one side of the site and appears to be planned as a principal pedestrian focus for the development. On-site shops and other buildings line the street in a

continuous line. Walking from the site to exhibitions or other events at the Exhibition Hall and to the nearby civic buildings will be very easy, and walking to the commercial center of the city along Main Street will also be convenient.

Several possible means to enrich the walking environment along the streets that edge the site include the following:

- The sidewalks along perimeter streets should be of sufficient width to accommodate the anticipated volume of walkers as well as signs, trees, lighting and street furniture. Awnings might also be appropriate in some locations. Sidewalk cafes would help make the casino a new and exciting feature of downtown life and draw people to the casino. The walking infrastructure will require careful design where new sidewalks join with older, perhaps narrower walkways.
- All sidewalks and ramps into crosswalks should be retrofitted for full ADA compliance.
- At all exterior entrances and exits from garages special care should be taken to warn and protect pedestrians who may be passing by on sidewalks. Audio signals that indicate an approaching vehicle are one potential method of accomplishing this.
- Garage entrances and exits on peripheral streets should be carefully designed to avoid sloping sidewalks. Sidewalks with significant cross slopes are uncomfortable to walk on and can be difficult for disabled people to negotiate.
- A wayfinding sign network should be provided to help people walk to and from the proposed development while exploring downtown. Signs pointing toward the civic center, museums, and other points of interest will help people explore sites beyond the casino.
- Transit access points, such as bus stops, the bus station and the train station should be clearly indicated, to encourage their use by both local residents and visitors. The goal should be to expedite getting to the site without a car. Most of the bus service is along Main Street, and bus stops with elegant shelters should be provided on both sides of the street in front of the casino.
- On-street parking on both sides of Main and State Streets should be retained, as it will slow traffic and give the streets a more urban feel. The proponent should work with the City to determine if it would be appropriate to build curb extensions, especially at the corners of the development, to create safer and more convenient pedestrian crossings.

Pedestrian access into and through the site

The principal pedestrian access into the site will be from parking garages and from the sidewalks along Main and State Streets. Direct pedestrian access is provided along all peripheral streets except East Columbus Avenue. Access for walkers is also provided at the drop off loop adjacent to the hotel, the valet parking loop inside the parking structure and at the entrance to the retail/entertainment center at the adjacent Armory Square.

Pedestrian access through the site could be improved with additional consideration given

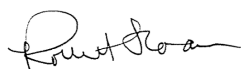
to walking routes through the complex:

- The pedestrian entrances on the Main Street side of the complex should be oriented to accommodate anticipated pedestrian movements and to encourage connections to the civic center and the Main Street shopping area. It appears that one of the major movements into and through the casino from the adjacent areas of the city will take place at the entrance that is closest to the intersection of State and Main Streets and the location of the Exhibition Center. This may become a primary point of reference for casino users and should be a welcoming location that includes full signage to help visitors find all parts of the casino.
- Access through the site should be encouraged to allow for easy walking through the very large buildings and retail/entertainment center that will cover the three blocks between Main Street and East Columbus Avenue.
- Access through the site will allow for complete interconnection between the casino and the proposed retail and entertainment facilities at the adjacent Armory Square development.
- Access through the site would join the proposed hotel facilities with the larger retail, entertainment or service offerings within the casino and Armory Square.
- All routes through the complex should have good wayfinding signage for people walking between components of the development, such as the retail and entertainment facilities and the hotel.

We appreciate your consideration of our comments and look forward to your responses to them.

Please feel free to contact WalkBoston with questions you may have.

Sincerely,



Robert Sloane
Senior Project Manager

Cc Massachusetts Gaming Commission
Mayor of Springfield