



January 31, 2014

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 Draft Environmental Impact Report
EEA #15033

Dear Secretary Sullivan:

WalkBoston has reviewed the Draft Environmental Impact Report for the MGM Springfield proposal and offers the comments below.

Within the DEIR, there are some changes in the dimensions of the plan. The proposal now includes a somewhat smaller, 501,108 square foot casino resort that includes retail/restaurant uses and banquet facilities in addition to gaming space. Adjacent to the casino will be a somewhat smaller 250-room hotel, 54 residential units, and an expanded, 159,397 SF retail and entertainment center to be known as Armory Square. A somewhat smaller, 3,740 space on-site multi-level parking garage will be provided. In most cases, these alterations to the plan do not appear to affect volumes or paths for walkers.

The ENF Certificate provided by Secretary Sullivan called out additional analysis to be included in the DEIR, and specified that the proponent was to meet with WalkBoston about our comments on the ENF. The Secretary's Certificate included this language:

"I strongly encourage the proponent to consult with WalkBoston during the preparation of the DEIR to identify opportunities to enhance the development of pedestrian access to and within the site as well as incorporation of safe pedestrian access for off-site roadway improvements."

The proponent did meet with us to discuss the project, and were very forthcoming about the pedestrian components of the project. In our discussion we covered many of the ideas that now appear in the DEIR and have solidified the commitment to serving walkers in the project plans and designs.

Secretary Sullivan's Certificate on the ENF mentioned some specific aspects to be explored further in the DEIR. These are important and form the basis of our comments on the DEIR:

1. Existing and proposed traffic signals.
2. Consistency with a Complete Streets design approach.
3. Existing and proposed connections for pedestrians.
4. A commitment to making improvements to increase the use of walking routes.

1. Existing and proposed traffic signals.

We are pleased to note that the DEIR calls for updating pedestrian signal equipment at the study area intersections around the site.

We note that two mid-block crossings with refuge islands and flasher assemblies are proposed – one on State Street and the other on Union Street - both roughly half way between Main Street and East Columbus Avenue and located at the exterior of the proponent's site.

Another mid-block crossing is noted in the DEIR that allows for a mid-block crossing to reach a bus stop. This crossing is located on Main Street at Howard Street, and represents a response to one of WalkBoston's recurring concerns - that transit riders should not be required to walk to corner locations to reach a bus stop if the stop is mid-block. Instead, crosswalks should be added

to provide safe and convenient walking routes for transit users.

We encourage the efforts of the proponent to provide a diagonal pedestrian crossing at the intersection of Main and State Streets, where a direct connection to the Mass Mutual Convention Center may be of significant use. We hope that the City of Springfield will work with the proponent to establish this crossing.

The proponent vows to upgrade pedestrian push buttons to MUTCD standards at all locations where new signals will be installed as part of this project or the mitigation efforts that result from the construction of the project. Upgrades of pedestrian push buttons are very welcome as are any other forms of enhancements for pedestrians crossing streets on the perimeter of the project.

2. Consistency with a Complete Streets design approach.

The proponent has been mindful of the design of streets on the perimeter of the project. In particular, the width of sidewalks has been discussed and the design now provides positive benefits to walkers.

For example, sidewalks on Main Street, according to several of the maps, vary in width from 10.5' to 18.' On the widest sidewalks, there is the promise of added pedestrian amenities, such as benches, pedestrian level lighting landscaping and other streetscape improvements. The designs of the narrowest sidewalks should be carefully considered to provide a clear walk zone of at least 5 feet, with no obstructions, such as trees or benches, intruding on that width.

We note that the pedestrian network evaluation preceding design has led to proposed improvements to sidewalk pavement conditions, sidewalk widths, crosswalks, and compliance with current accessibility standards.

One of the requirements of a complete streets approach to street design is adequate provision for buses, bus stops and transit riders. In central Springfield, including Main Street along the east boundary of the site, heavy bus traffic (including four major PVRTA bus routes) serves downtown employers and merchants and ordinarily occupies a lane that can be shared with bicycles, but should otherwise be retained for exclusive use by buses.

In addition to the PVRTA bus routes, a proposed downtown trolley line will connect the casino site to rail and bus service in the vicinity of Union Station, about ½ mile north of this site. The trolley line makes the connection efficiently, and will encourage transit use by casino employees and patrons.

3. Existing and proposed connections for pedestrians.

The proposal includes several connections for pedestrians into the large complex, particularly along Main Street. The proponent has made progress in the design of the proposed Armory Plaza at the south edge of the casino building by providing a car-free area that combines the open space surrounding the old, restored Armory building with the relatively small but useful open space of DaVinci Park. The use of the Plaza may be combined with the uses in the adjacent Armory Marketplace building and may host civic events and a farmers' market.

A new pedestrian attraction is the provision of a landscaped plaza atop the casino building. This plaza is completely removed from vehicular traffic and provides a quiet space where people may walk or sit.

A pedestrian connection already exists between the site and the Connecticut River pedestrian and bicycle trail. An existing at-grade crossing at the foot of State Street allows pedestrians to move between the proponent's site and the trail. It is anticipated that this connection will be used as a way to get from the site to the nearest open space. Lighting under I-91 at State Street will help

open the area to pedestrians by making it more legible and safe.

A similar pedestrian connection exists at Union Street, where the walkway link that passes under I-91 allow pedestrians to reach the Naismith Basketball Hall of Fame. The distance is relatively short and is eminently walkable. The connection will be improved by the proposed lighting to be placed under I-91.

4. A commitment to making improvements to increase the use of walking routes.

The proponent's site is central to the Springfield urban area and will become an integral part of downtown as it is developed. Within the site, there are many places to walk that may require little effort to get patrons to explore. Each entrance/exit to the site should have wayfinding signs to assist walkers and encourage them to walk to destinations within and outside the entertainment complex. The signs should indicate where to find locations such as the center of the casino, the hotel, the outdoor plaza, shops and theatres on the south side of the site, Former Armory, Armory Square Marketplace, the rooftop landscaped plaza, and the main entrances to the parking garage.

Outside the casino complex, there are many attractions in downtown Springfield, and wayfinding signs that guide walkers should include: the Mass Mutual Convention Center, Union Station/Main Bus Depot, Dr. Seuss Sculpture Garden, Springfield Museums, the Civic Center, Springfield Armory, and nearby parks.

Signs should also indicate how to find the riverside attractions including views of the river and the Connecticut River Pedestrian and Bicycle Trail and the Naismith Basketball Hall of Fame.

Wayfinding signs should include walking times to reach destinations. Pedestrians do not think in terms of miles, and minutes required to take a walk are much more effective in conveying the effort that might be involved. Walkers may think little of having to walk ten minutes, but recoil at the prospect of walking ½ mile, even though the distances are the same.

Specific wayfinding signs that should include walking information as well as vehicle and bicycle information are:

- Signs along West Columbus Avenue on the river-facing side of the site,
- Signs on Union Street at the edge of the project, and
- Signs along the East Columbus Avenue side of the site.

Wayfinding can be enhanced with local walking maps that help people find their way around the site and its environs.

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