



August 8, 2014

Secretary Maeve Vallely Bartlett
Executive Office of Energy and Environmental Affairs (EEA)
Attn: Holly Johnson
100 Cambridge St., Suite 900
Boston MA 02114

RE: Comments on the Supplemental Draft Environmental Impact Report for the Mohegan Sun Development
MEPA# 15006

Dear Secretary Vallely Bartlett:

The proposal included in the Supplemental Draft Environmental Impact Report makes some changes to the components of the Mohegan Sun Development and slightly alters pedestrian access to the site. Construction will include 965,000 sq ft of gross floor area, providing space for 5,000 gaming positions, 450-500 hotel rooms, 44,000 sq ft of meeting/entertainment space and 100,000 sq ft of retail space. Parking for 4,200 cars will be located beneath the structure, with an additional 270 cars on surface but below the first floor of the building.

Pedestrian entry into the site takes place at the two corners of the site, with a southwest corner entrance devoted to people arriving by private vehicles, and a northeast corner entrance devoted to people arriving by public transit (bus and subway), tour buses and walking from the surrounding area. Most of our comments focus on the building's external design, and the ways in which people find access to and from the building.

1. Access to the site – the balance between transit and driving

Although this casino site is much better served by public transportation than any of the other proposed sites in Massachusetts, access by private vehicle may be encouraged because of the extremely large number of on-site parking spaces. We urge the proponent to give greater consideration to **encouraging** transit and pedestrian access and **discouraging** vehicular access.

- A potentially attractive reliance on public transportation may be lost because by the ease of driving and finding a parking space. Perhaps parking should be de-emphasized through pricing and location.
- People arriving by vehicle are pampered by weather protection, provided in two ways: either by live access using a porte cochere and valet services, or by direct access into the underground parking garages where access is served by elevators.
- The access area at the porte cochere does not encourage pedestrians who do not arrive by car. For example, walkers using Tomasello Drive to get to the entrance areas of the southwest corner of the site will find a sidewalk that leads into the parking garage where elevators connect to the main floors.

2. Access on foot will be primarily served by public and private transportation to the northeast corner of the site.

At this corner there is access from adjacent MBTA bus stops. The MBTA Beachmont Station on the Blue Line is about 150 feet away. Tour bus bays are immediately adjacent to the concourse of the entry way. The concentration of arrivals into the concourse area appears to be an efficient way to enter the development.

- The grade of the northeast corner concourse may be difficult for certain users to reach. It appears that all people arriving at his corner of the site will have to go up at least one level via elevators and/or stairs to reach the main floor, where further vertical public circulation is available. Access to the concourse level varies. For example, people arriving by public transportation, whether by bus or rapid transit, will need to go up at least eight steps to the concourse level. Arrivals from the tour bus drop-off area may have to do the same. It is unclear how arriving patrons in wheelchairs will access the concourse; there is no evident ADA access ramp from the sidewalk at the intersection of Winthrop and Washburn Avenues up to the concourse level.
- Weather protection for arriving pedestrians should be provided. Covered walkways would be appropriate, particularly on the approach from Washburn Avenue and on the open stairway at the main entrance.

3. Access to and from the Beachmont MBTA station

The proponent should work with the MBTA to enhance access to and from the rapid transit platforms at the Beachmont station. Wayfinding signs inside the station should be used to direct riders to the Mohegan Sun complex. Wayfinding signs at the entrance/exit concourse of the proposed development could reinforce the potential for patrons to take transit, especially because the station is so close.

4. Off-site improvements

The proponent has committed \$45 million for off-site roadway, traffic and safety improvements. We hope that the commitment will be honored with full ADA compliance, and with appropriate pedestrian signal equipment at each intersection (including count-down signals, leading pedestrian indicators and automatic recall of WALK signals during the hours when pedestrians will be present). Crosswalks should be provided with zebra striping, and in some locations in-street pedestrian signs such as “yield to pedestrian” may be appropriate. Refuge islands at street centerlines should also be considered on major roadways.

Thank you for the opportunity to comment on this important project.

Sincerely,



Wendy Landman
Executive Director



Robert Sloane
Senior Planner