



Frank P. Fitzgerald
John E. Drost, Jr.
Stephanie A. Fitzgerald †
Brian S. Fitzgerald *
Jane L. Mantolesky
Daniel T. Wright *

†Also admitted in New York
*Also admitted in Connecticut

Direct e-mail: fpf@fitzgeraldatlaw.com

November 18, 2015

Phil Dromey
Office of Planning and Economic Development
City of Springfield
70 Tapley Street
Springfield, MA 01104

RE: Site Plan Review application – Blue Tarp reDevelopment, LLC d/b/a MGM
Springfield (“MGM Springfield”)

Dear Phil:

Enclosed please find with regard to the above application:

1. Landscape and street lighting plans;
2. Signage plan waiver request; and
3. Material matrix.

These submittals are supplemental to the following materials previously submitted to your office.

1. Site Plan and elevations submitted on October 19, 2015; and
2. Storm water management submitted on October 28, 2015.

Together the above-referenced documents and materials constitute MGM Springfield’s complete Site Plan submission as of today’s date.

Sincerely,



Frank P. Fitzgerald

FPF/peo
Enclosures

BRICK



CLAY BRICK
MANUFACTURER:
TRIANGLE BRICK



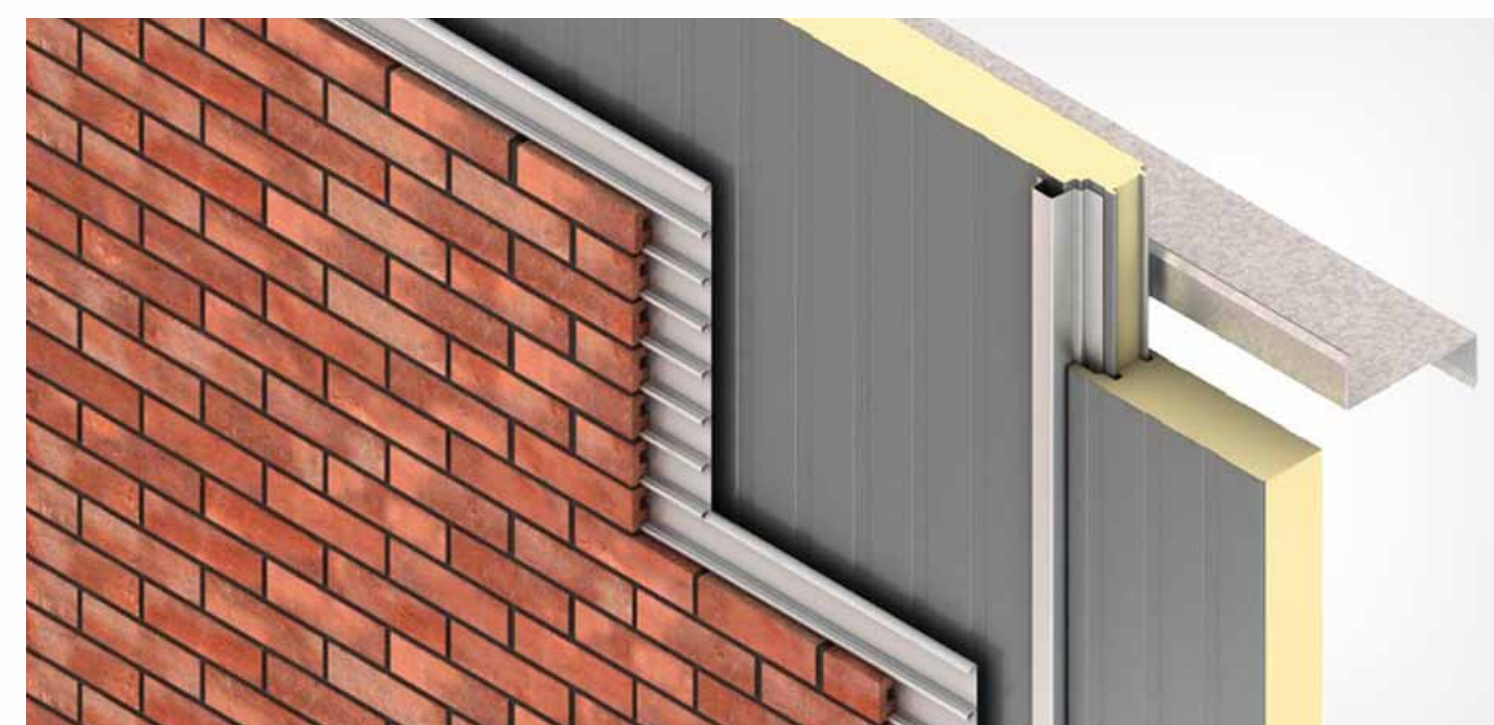
PORCELAIN BRICK
MANUFACTURER:
CAROLINA CERAMICS



THIN BRICK
MANUFACTURER:
GLEN-GERY BRICK



PANELIZED BRICK
SYSTEM
MANUFACTURER:
SLENDERWALL



THIN BRICK
RAINSCREEN
MANUFACTURER:
KINGSPAN

STONE



FRENCH LIMESTONE
MANUFACTURER:
CORONADO STONE



CARVED STONE



SMOOTH LIMESTONE
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COPPER CRAFT



COPPER ROOF
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AMERICAN METAL

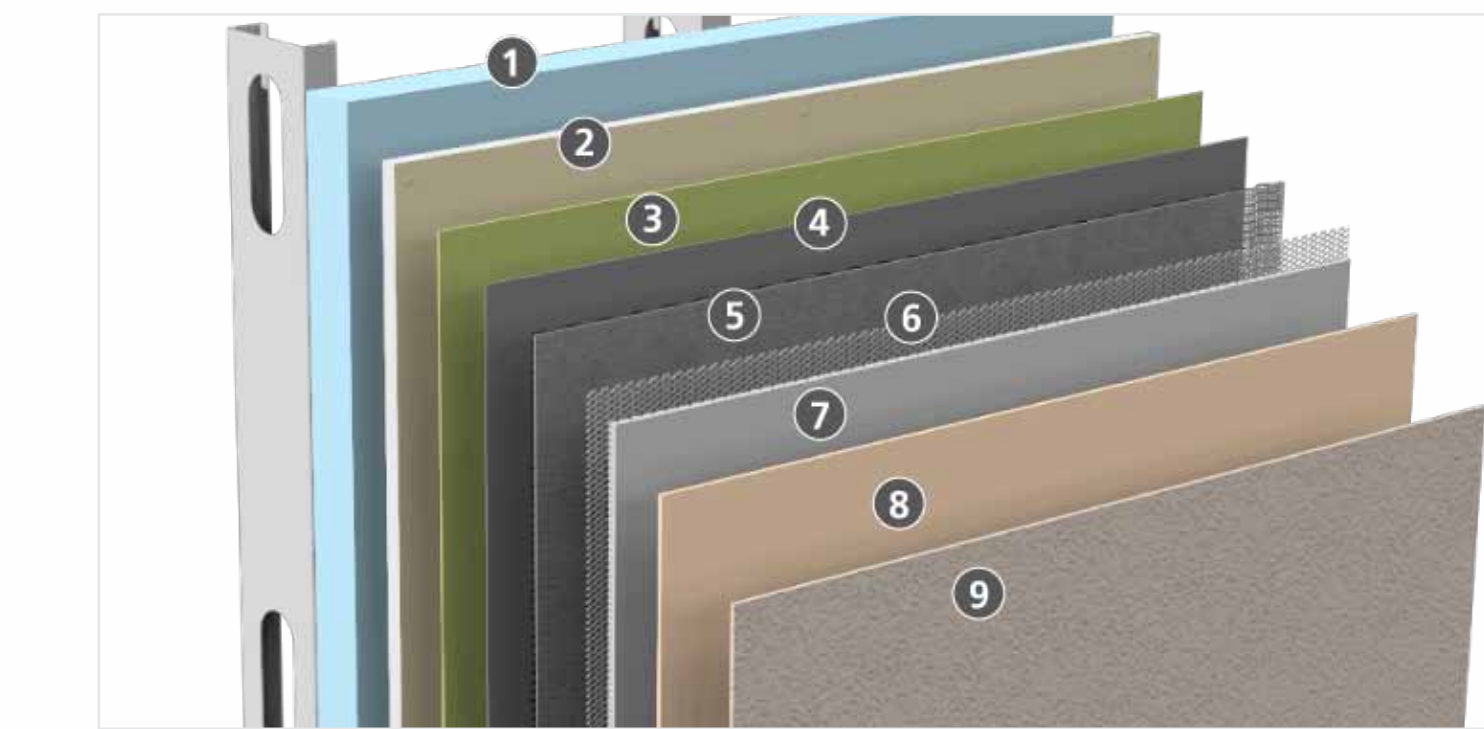
PLASTER



TEXTURED PLASTER
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STO CORP



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STO CORP

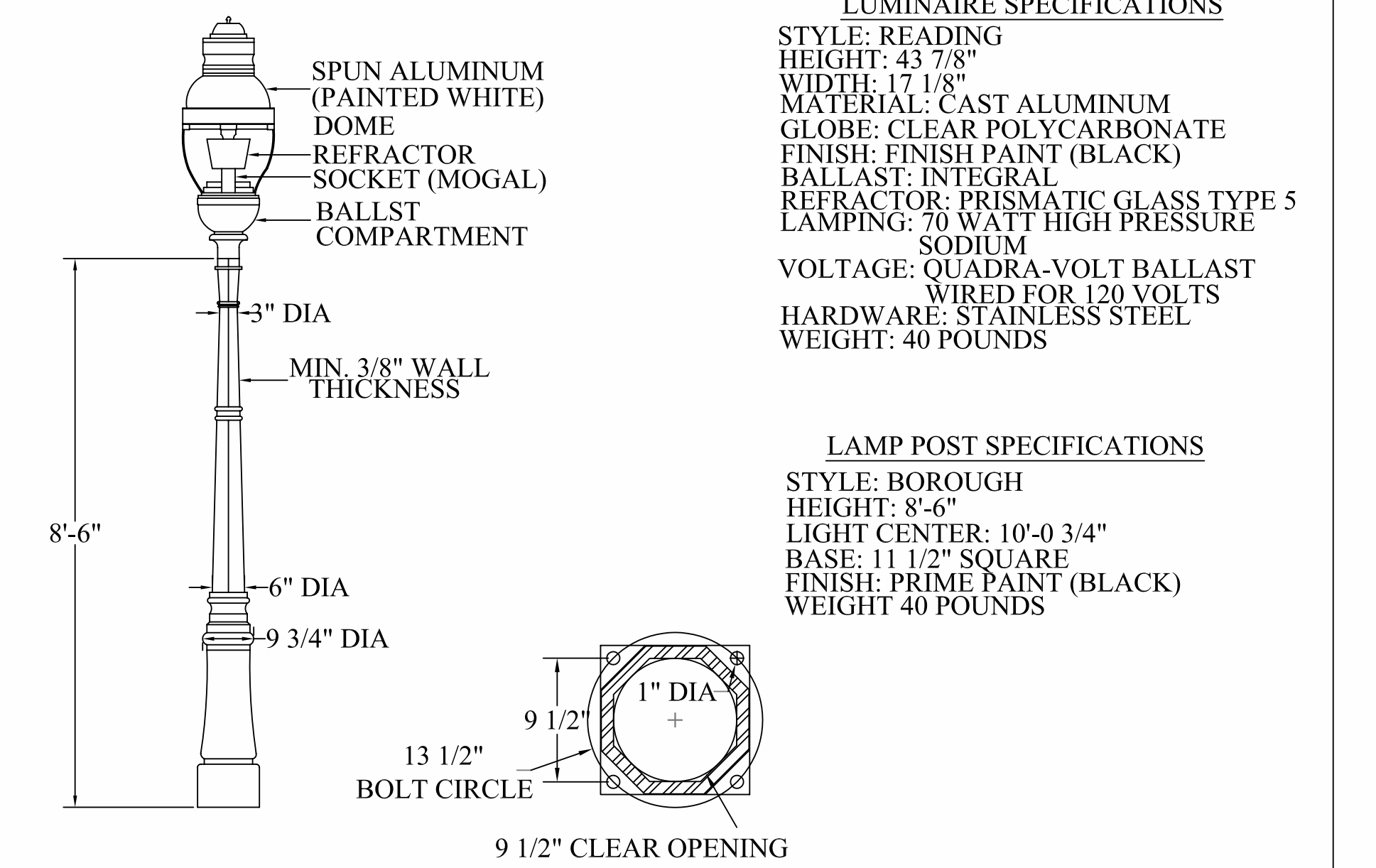


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STO CORP

LIGHTING



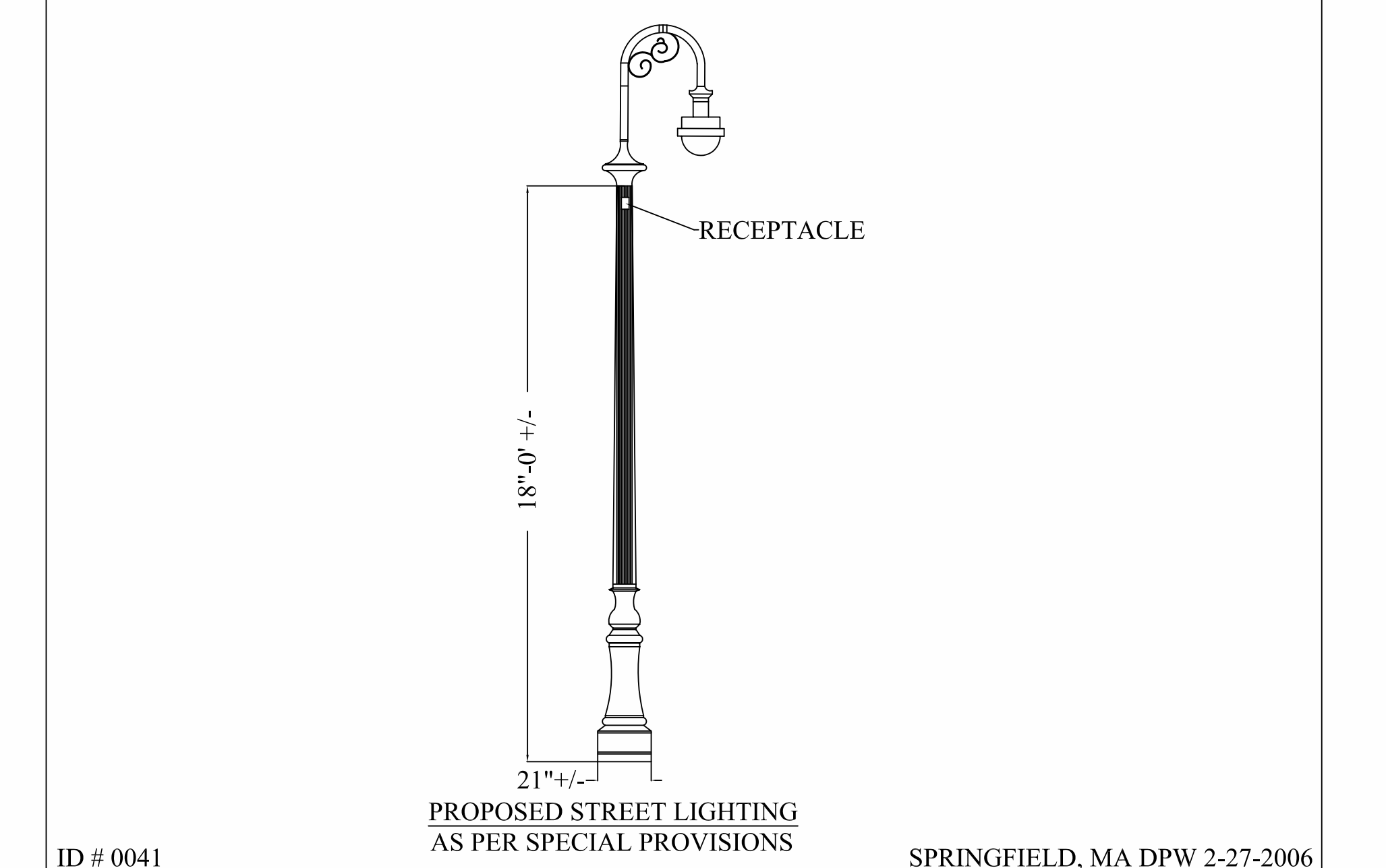
DECORATIVE LIGHTING BOROUGH STYLE



ID # 0038

SPRINGFIELD, MA DPW 2-27-2006

DECORATIVE LIGHTING BISHOP'S CROOK



ID # 0041

SPRINGFIELD, MA DPW 2-27-2006



November 18, 2015

By First Class Mail and Email

Phil Dromey
Office of Planning and Economic Development
City of Springfield 70 Tapley Street
Springfield, MA 01104

Re: Casino Overlay District Site Plan Review Application

Dear Phil:

Blue Tarp reDevelopment, LLC d/b/a MGM Springfield ("MGM") is in receipt of your October 26, 2015 letter regarding MGM's Casino Overlay District Site Plan Review Application (the "Application"). Your letter indicated that the Application did not address the "signage and specialty lighting concept" as detailed in Section 8.5 of the Springfield Zoning Ordinance (the "Ordinance"). We previously discussed with your office that our signage and lighting plans would follow at a later date closer to opening as we continue to refine those aspects of the development. Based on further discussions subsequent to submission of our Application, we now understand that you require a formal request to the Application be permitted to proceed with the Site Plan Review process notwithstanding the fact that the "signage and specialty lighting concept" was not included with the Application and will be submitted at a future date. Please accept this letter requesting the same.

Due to the unique nature of the Project¹ and considering that Operations Commencement is not expected to occur until Fall 2018, MGM has not yet determined size, scope, and type of signage appropriate for the Project. Pursuant to Section 12.2.32 of the Ordinance, "[t]he Office of Planning and Economic Development may waive specific submission requirements for a Site Plan Review application upon demonstration by the applicant that a requirement is not necessary or it inapplicable to the applicant's project." The Ordinance provides in addition that, "[d]isapproval of a request in the Site Plan review for a particular specialty signage or lighting component shall not be cause to disapprove the Site Plan Review or the Use and the applicant would still have the right (if the other Site Plan Review criteria were met and approved as per Section 8.5.32) to proceed with the development without the requested specialty signage or with amended specialty signage approved by the City." Ordinance, at Section 8.5.34. MGM is requesting that the Office of Planning and Economic Development ("OPED") proceed with the Application without the complete signage plan so that it may proceed with the development of the Project without delay. An

¹ Capitalized terms not explicitly defined herein shall have the same means as in the Host Community Agreement.



appropriate signage plan, as required by the Ordinance, will follow once it is fully developed. MGM will continue to keep OPED apprised of its progress in that regard.

Should you have any questions regarding the Application, please feel free to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "Seth Stratton".

Seth Stratton
Vice President & General Counsel

cc: Brian Packer
Frank P. Fitzgerald, Esq.



Department of Environmental Protection

Western Regional Office • 436 Dwight Street, Springfield MA 01103 • 413-784-1100

Charles D. Baker
Governor

Karyn E. Polito
Lieutenant Governor

Matthew A. Beaton
Secretary

Martin Suuberg
Commissioner

November 9, 2015

Matthew A. Beaton, Secretary
Executive Office of Energy & Environmental Affairs
Massachusetts Environmental Policy Act Office
Holly Johnson, EEA No. 15033
100 Cambridge Street, 9th Floor
Boston, MA 02114-2524

Re: MGM Springfield Casino
Springfield, MA

Dear Secretary Beaton,

The Massachusetts Department of Environmental Protection (MassDEP), Western Regional Office (WERO) appreciates the opportunity to comment on the Notice of Project Change (NPC) submitted for the MGM Springfield casino proposal located in Springfield, MA (EEA #15033). The project is proposed by Blue Tarp reDevelopment, LLC (MGM Springfield). The applicable MassDEP regulatory and permitting considerations regarding wetlands, waterways, air pollution, solid waste, and waste site cleanup are discussed.

I. Project Description

MGM Springfield proposes to decrease the size of the proposed development. The initial project was a mixed use (gaming/retail/residential) casino project on a 14.52-acre site located on the south end of Main Street in Springfield. The project includes a Casino Block, a Retail Block and a Parking Structure. The project consists of 926,900 s.f. of retail, commercial, casino and residential development as well as an 8-story 3,800 space parking garage. The proposed change in project is as follows:

- 1.6 acres decrease of land alteration,
- decrease of approximately 122,500 sf of development,
- decrease of approximately 1,135 additional vehicle trips per day,
- decrease of approximately 19,000 and 14,000 gallons per day of potable water use and sanitary wastewater generated, respectively.

II. Applicable Regulations Mass DEP

Wetlands & Waterways
310 CMR 10.00

Drinking Water

310 CMR 22.00

310 CMR 27.00

Wastewater

314 CMR 7.00

314 CMR 12.00

Air Pollution

310 CMR 7.00

Solid Waste

310 CMR 16.00

Bureau of Waste Site Cleanup

310 CMR 40.000

III. Permit Discussion

Bureau of Resource Protection

MassDEP has no additional comments. All previous comments remain valid.

Bureau of Waste Prevention

MassDEP has no additional comments. All previous comments remain valid.

Greenhouse Gas (GHG) Policy

MassDEP has no additional comments. All previous comments remain valid.

Bureau of Waste Site Cleanup

MassDEP has no additional comments. All previous comments remain valid.

IV. Other Comments/Guidance

Section 61 Findings – Mitigation

There are no currently defined permits from MassDEP and therefore MassDEP cannot comment on the Section 61 mitigation findings. MassDEP has no additional comments. All previous comments remain valid.

If you have any questions regarding this comment letter or pre-permitting, please do not hesitate to contact Catherine Skiba at (413)-755-2119.

Sincerely,

This final document copy is being provided to you electronically by the Department of Environmental Protection. A signed copy of this document is on file at the DEP office listed on the letterhead.

Michael Gorski
Regional Director

cc: MEPA File



Charles D. Baker, Governor
Karyn E. Polito, Lieutenant Governor
Stephanie Pollack, MassDOT Secretary & CEO

massDOT
Massachusetts Department of Transportation

November 18, 2015

Mathew Beaton, Secretary
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114-2150

RE: Springfield – MGM Springfield - NPC
(EEA #15033)

ATTN: MEPA Unit
Holly Johnson

Dear Secretary Beaton:

On behalf of the Massachusetts Department of Transportation, I am submitting comments regarding the MGM Springfield project in Springfield, as prepared by the Office of Transportation Planning. If you have any questions regarding these comments, please call J. Lionel Lucien, P.E., Manager of the Public/Private Development Unit, at (857) 368-8862.

Sincerely,

David J. Mohler
Executive Director
Office of Transportation Planning

DJM/jll

cc: Thomas J. Tinlin, Administrator, Highway Division
Patricia Leavenworth, P.E., Chief Engineer, Highway Division
Richard Massé, P.E., Acting District 2 Highway Director, Highway Division
Stanley Wood, P.E., Highway Design Engineer
Neil Boudreau, State Traffic Engineer
Pioneer Valley Planning Commission
Pioneer Valley Transit Authority
Planning Department, City of Springfield
Marie Angelides, Select Board, Town of Longmeadow
Planning Department, City of West Springfield
Planning Department, City of Chicopee
Planning Department, City of Agawam
Planning Board, Town of East Longmeadow
Planning Board, Town of Ludlow
Planning Board, Town of Wilbraham
Kristin Slaton, Director, MassRIDES
PPDU files
MPO Activities files



Charles D. Baker, Governor
Karyn E. Polito, Lieutenant Governor
Stephanie Pollack, MassDOT Secretary & CEO

massDOT
Massachusetts Department of Transportation

MEMORANDUM

TO: David Mohler, Executive Director

FROM: J. Lionel Lucien, P.E., Manager, Public/Private Development Unit
Office of Transportation Planning

DATE: November 18, 2015

RE: Springfield – MGM Springfield – NPC
(EEA #15033)

The Public/Private Development Unit has reviewed the Notice of Project Change (NPC) for the MGM Springfield project in Springfield. The original project entailed the development of a residential, retail, dining and entertainment district in downtown Springfield to create two separate "blocks" of development, referred to as the "Casino Block" and the "Retail Block." The Casino Block was expected to consist of 501,108 square feet (sf) of development, including a hotel, 3,821 casino gaming positions, retail and restaurant uses, convention space, office space, and 54 residential apartments. The Retail Block was expected to consist of approximately 159,397 sf of development including retail/restaurant space, a bowling alley, office space, a radio station, an event plaza, and a multi-screen cinema. A parking garage totaling 3,762 spaces was also expected to be built to accommodate parking on-site.

The NPC includes the following changes to the previous development program:

- Reduction in gaming positions by approximately 164 positions and reduction of the back-of-house space by approximately 68,000 sf.
- Reduction in Armory Retail Block development to eliminate 26,000 sf of retail, 8,200 sf of bowling alley, and 10,400 sf of cinema spaces.
- Reduction in parking garage size by one level to provide 387 less parking spaces.
- Relocation of the 54 residential units previously on site to an off-site location.
- Relocation of the 25-story hotel to Main Street and its redesign to a 6-story hotel with the same number of rooms.

The project site comprises approximately 14.5 acres bounded by Main Street to the north, Union Street to the east, East Columbus Avenue to the south, and State Street to the west. In addition, the site encompasses portions of Bliss Street and Howard Street within its boundaries. The site is currently occupied by several buildings and has a number of vacant lots, a majority of which are being used as surface parking lots. The existing buildings on site accommodate a variety of uses, including commercial, retail and residential space.

Based on information included in the NPC, the project at full build is now expected to generate approximately 21,133 new vehicle trips on an average weekday, a reduction from the 22,268 new vehicle trips identified in the FEIR. Although the NPC did not include a transportation impact assessment (TIA) for the modified development program for the project, we believe that these changes would not result in overall adverse impacts to the transportation system within the study area of the project. MassDOT notes the following comments that should be used to update the draft Section 61 Finding previously submitted to MassDOT:

The study area will experience an overall reduction of traffic due to the reduction in size of the project; however, some of the changes to access configurations may redistribute the site traffic and result in localized impacts that would need to be addressed and mitigated as appropriate. In particular, the Proponent should pay close attention as to how the site access modifications to the proposed garage, the reduction of the number of parking spaces, and the potential relocation of the bus layover would impact traffic patterns and circulation within the study area. The Proponent should provide the revised trip distribution, traffic volume networks and peak hour capacity analyses for all impacted intersections so they can be documented in the Final Section 61 Finding. If improvements are required at any of these intersections, the Proponent should provide a clear commitment to implement these mitigation measures.

The NPC proposed the relocation of the 54 unit residential development to an off-site location(s) from the original on-site location. The Proponent has an agreement to purchase 195 State Street, on the corner of State and Maple Street, for reuse for up to 35 of these units. The Proponent has already committed to making pedestrian improvements to the State St/Maple Street intersection. Considering the low trips generated by the residential units, the impacts should be minimal. However, if the location of the 35 units is changed and the new location is not at one of the intersections to receive pedestrian improvements, then the current roadway, transit, bicycle and pedestrian accommodations should be evaluated and improved accordingly.

The Proponent is working with MassDOT to conduct the Road Safety Audits (RSAs) for locations in the study area that were included in the Highway Safety Improvements Program. Once these RSAs are completed, the Proponent should work with MassDOT to identify some of the recommendations that they would commit to implement to address existing and future safety deficiencies within the study area. All recommendations from the RSA that reasonably address issues for all modes created or potentially increased by the site generated traffic should be considered as potential mitigation.

In addition, MassDOT would like to see reiterated the following commitments that appear to have been omitted in the Draft Section 61 Finding:

- Providing ITS elements on Route 57 to complement the committed ITS elements along Route 5.
- Implementing signal timing improvements and coordination at the Riverside Street/West Street and Plainfield Street/Avocado Street intersections.

- Analyzing the need for exclusive right turns lanes along Union Street westbound into the site to facilitate turning and through movements.
- Investigating the feasibility of providing two through lanes and a right turn lane for Union Street WB approaching East Columbus Avenue.
- Provide highway lighting at each crosswalk at the North End Rotary, which was also strongly encouraged in MEPA's FEIR Certificate.

The Proponent should submit a revised draft Section 61 Finding to address the changes in the project development program, address the above comments, and update the mitigation program accordingly. The Proponent should consult with appropriate MassDOT Divisions, including the Office of Transportation Planning, the Highway Division, as well as the PVT A prior to the submission of the Draft Section 61 Finding. If you have any questions regarding these comments, please contact me at (857) 368-8862.



NOV 18 2015

The Commonwealth of Massachusetts
William Francis Galvin, Secretary of the Commonwealth
Massachusetts Historical Commission

November 13, 2015

Jed M. Nosal
Brown Rudnick
One Financial Center
Boston, MA 02111

RE: MGM Springfield Casino Project, Hotel, Apartments/Armory Square Retail & Cinema, Main, Union, State, Howard, & Bliss Streets, Springfield, MA; MHC# RC.53951, EEA# 15033

Dear Mr. Nosal:

Staff of the Massachusetts Historical Commission (MHC) have reviewed the revised draft MOA and revised project information for the proposed MGM Springfield Casino Project, which was submitted by your office and was received at this office on October 29, 2015. MHC staff have also reviewed the Notice of Project Change (NPC) for the revised project design.

Staff of the MHC have the following comments on the revised draft MOA:

- Stipulation 2, Section a
The last sentence should have the updated name and date of Attachment A. Please updated to read, "See Attachment A: MGM Springfield, 73 State Street Dome Salvage, October 28, 2015."
- Stipulation 2, Section c
The name of Attachment B should also include a reference date. See comment below on Attachment B.
- Stipulation 4
The name of Attachment C should be "Springfield Buildings and Interiors Consolidated Salvage Program, July 18, 2015" to reflect the name of Attachment C shown on the Attachment cover page.
- Attachment A
The cover page needs to be updated to reflect the correct date of October 28, 2015.
- Attachment B
The Attachment B cover page should reference the dates of the renderings. The renderings should be dated.
- Attachment D
Remove "MGM Springfield" from the title of Attachment D.

The revised project design does not include preservation of any of the historic buildings previously proposed for partial or complete demolition, so MHC has no additional comments on the NPC.

The MHC looks forward to reviewing a revised draft MOA that is responsive to these comments:

These comments are offered to assist in compliance with M.G.L. Chapter 9, sections 26-27C (950 CMR 71.00) and MEPA (301 CMR 11). Please do not hesitate to contact Elizabeth Sherva or me if you have any questions.

Sincerely,



Brona Simon
State Historic Preservation Officer
Executive Director
Massachusetts Historical Commission

xc: Brian Packar, MGM Springfield
Hunter Clayton, MGM Resorts International
Blue Tarp reDevelopment LLC ("MGM Springfield")
John Ziemba, Massachusetts Gaming Commission
Stephen Crosby, Massachusetts Gaming Commission
Mayor Domenic J. Sarno, City of Springfield
Scott Hanson, City of Springfield
Springfield Redevelopment Authority
MassDEP Western Regional Office
MassDOT District 2 Office
Massachusetts Department of Housing & Community Development
Ralph Slate, Springfield Historical Commission
Robert McCarroll, Springfield Preservation Trust
Deirdre Buckley, Massachusetts Environmental Policy Act Office
Laura Rome, Epsilon Associates
Elizabeth Rairigh, Pioneer Valley Planning Commission
Preservation Massachusetts
Carol Almeida, FHWA
Jaime Loichinger, ACHP
William J. Devlin
James A. Boone

Edward M. Pikula, Esq.
City Solicitor

Law Department
36 Court Street, Room 210
Springfield, MA 01103
Office: (413) 787-6085
Direct Dial: (413) 787-6088
Fax: (413) 787-6173
Email: epikula@springfieldcityhall.com



THE CITY OF SPRINGFIELD, MASSACHUSETTS

November 9, 2015

Secretary Matthew A. Beaton
Executive Office of Energy Environmental Affairs
Attn: Holly Johnson, MEPA Office
100 Cambridge Street, Suite 900
Boston, MA 02114

Via email: holly.s.johnson@state.ma.us

Subject: Notice of Project Change
MGM Springfield, EEA #15033
Notice of Project Change

Dear Secretary Beaton:

With regard to the above referenced, the City of Springfield (“City”) prepared with the City’s consultants, Taft Stettinius & Hollister LLP , and Fuss & O’Neill, Inc. (F&O) and provided comments after an initial review of the Final Environmental Impact Report (FEIR) for the proposed Springfield MGM located in the South End neighborhood of downtown Springfield. Those comments were dated December 22, 2014.

Please note that the City has not approved any proposed changes to its Host Community Agreement (“HCA”) with MGM, and has not approved any Site Plan Review application under the Springfield Zoning Ordinance.

However, with regard to the Notice of Project Change submitted October 19, 2015, solely as to all feasible measures to avoid, minimize, and mitigate damage to the environment, and specifically not related to any proposed changes to the HCA or Site Plan Review under the Springfield Zoning Ordinance, the City incorporates by reference herein those original traffic and transportation comments identified by F&O through technical review and discussions with the Springfield DPW.

MGM Springfield, EEA #15033 - Notice of Project Change

November 9, 2015.

Page - 2 -

Thank you for your time and attention.

Very truly yours,

A handwritten signature in black ink, appearing to read "Edward M. Pikula". The signature is fluid and cursive, with a prominent initial "E" and a long, sweeping underline.

Edward M. Pikula, City Solicitor

cc: Mayor
Chief Development Officer



October 23, 2015

RECEIVED
OCT 27 2015

John Ziemba
Ombudsman
Massachusetts Gaming Commission
101 Federal Street, 23rd Floor
Boston, MA 02110

Dear Mr. Ziemba:

The Springfield Historical Commission (SHC) reviewed a presentation by MGM on October 15, 2015. The discussion was about design changes related to the proposed elimination of the hotel tower and relocation of the hotel to Main Street, and centered on two items: the possibility of reusing the Untied Electric Building for the new proposed programming, and the impact of the relocated hotel on the Union House on Main Street.

The SHC was satisfied with MGM's stated rationale for the inability to reuse the United Electric building, namely that the building is configured for office space and is ill-suited to house a larger single-room food court. The SHC did notify MGM that the new proposed location for the salvaged dome was not quite in spirit with the draft MOA due to the dome appearing over a three-walled space versus a five-walled space; MGM has promised to rectify this with a minor change in their design which I am sure will be forwarded to the SHC before the MOA is signed.

The SHC was also satisfied with MGM's proposal to minimize the impact of the relocation of a six-story hotel behind the façade of the Union House, namely that the hotel façade will be set back approximately six feet from the cornice; that the hotel façade above the Union House will be constructed of glass to avoid any conflicting architectural details with the Union house; that the amount of façade of the Union House preserved along the Bliss Street elevation is increased to ten feet, and that the building immediately to the south (left) of the Union House will abut the Union House façade instead of being separated by a glass façade buffer.

I would like to raise one concern, however: In response to the press questioning the reduction in retail space that accompanies the hotel relocation, MGM Spokesperson Carole Brennan strongly implied that the SHC and/or MHC was responsible for the 38% reduction in retail space

November 6, 2015

Matthew A. Beaton, Secretary
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, Massachusetts 02114

Attention: MEPA Unit

Reference: Review Comments on the Notice of Project Change for the Proposed MGM Springfield Development, EEA # 15033.

Dear Secretary Beaton:

The Pioneer Valley Planning Commission (PVPC) has the following review comments to offer on the Notice of Project Change (NPC) filed for the above-cited project. The proposed project is a multi-use development consisting of the recently licensed MGM casino as well as hotel, apartment, office and retail space located in downtown Springfield, Massachusetts. The NPC proposes to: relocate the proposed housing component of the project off-site; modify the height and configuration of the proposed hotel; reduce the number of on-site parking spaces by 387; reduce the number of gaming positions by 164; reduce the total size of proposed retail space by 26,800 square feet; and, add a 1,300 square foot arcade.

Intersection of Level of Service

The proposed project changes result in many modifications to the existing site plan, which in turn, will result in the redistribution of site traffic onto the local street system. We cannot agree with the project proponent that the proposed changes are wholly insignificant and do not require an update of the quantitative capacity analysis of intersections in the vicinity of the site. Information included in the NPC indicates that it is likely traffic will be redistributed internally and result in traffic that was previously expected to use Howard Street to now use Union Street and Bliss Street. This could be of critical importance, particularly on Union Street which can experience significant congestion at its intersection with East Columbus Drive. Given this, we'd request that additional information be provided on the anticipated changes to the trip distribution information filed as part of the FEIR. It is also recommended that new level of service analysis be performed for the study area intersections in the immediate vicinity of the project, including the Interstate I-91 on and off ramps.

Roadway Safety Audits

The project proponent has committed to conduct a number of roadway safety audits (RSAs) at a number of high crash locations in the study area. PVPC would like to commend the project proponent for continuing to advance these necessary RSAs. It is requested that the findings from all RSAs completed by the project proponent be included as part of any future filings for this project.

Parking

The proposed change is expected to result in the loss of 387 parking spaces. While the NPC includes an analysis of parking needs, it does not include information on plans for overflow parking that could be necessary as a result of special events. Accordingly, we urge that more information be provided on the potential impact of special events on parking both on-site and in the downtown Springfield area.

Off-site Bus Staging

The NPC indicates that the project proponent is currently investigating opportunities for off-site staging for buses. Additional information is requested on the proposed locations for such off-site bus staging as well as the estimated number of buses that may require staging during peak hours of operation.

Aesthetics

The proposed project changes will now result in the parking garage to be the largest component of the project in terms of both height and footprint. This could have a negative impact on the visual and physical separation of downtown Springfield from the riverfront area of the Connecticut River. While the NPC does include artist concepts of the proposed project, it is unclear what the true impact of the development will be on the riverfront area. Additional information is, therefore, requested on the design and aesthetics view of the parking garage structure, particularly looking from the Connecticut River.

Thank you for the opportunity to offer our comments on the NPC prepared for this proposed project.

Sincerely,

Timothy W. Brennan
Executive Director

cc: S. Hanson, PVPC Alternate – Springfield
C. Cignoli, Director of Public Works - Springfield
L. Lucien – MassDOT Public/Private Development
R. Masse – MassDOT District 2 Highway Division
K. Dandrade – TEC
J. Ziemba - MGC

BEALS · ASSOCIATES INC.

2 PARK PLAZA, SUITE 200, BOSTON, MA 02116
PHONE: 617-242-1120

November 9, 2015

Secretary Matthew A Beaton
Executive Office of Energy & Environmental Affairs
MEPA Office
Attn: Holly Johnson
100 Cambridge Street, Suite 900
Boston, MA 02114

Submitted via email and hand delivery on November 9, 2015

**Subject: Briarwood Thirteen, LLC
Notice of Project Change
MGM Springfield, EEA #15033**

Dear Secretary Beaton:

We are writing on behalf of Briarwood Thirteen, LLC in regard to the Springfield, Massachusetts MGM Casino Notice of Project Change EEA Number 15033. Over the past two years, we have reviewed and commented on both the DEIR prepared by Epsilon Associates dated December 16, 2013 and the FEIR prepared by Epsilon Associates dated November 6, 2014. We have met directly with Blue Tarp Redevelopment – the development arm of MGM – several times. We have provided testimony to the Massachusetts Gaming Commission, who wrote in a response letter to us that “the Commission believes many of the issues raised can be dealt with more efficiently and more appropriately during the MEPA process and the license and permitting processes that will follow.” Now we have reached that point in the process and yet, development proceeds without the majority of our concerns addressed. To date, Blue Tarp Redevelopment has received eight Building Permits and sixty-two permits from the Springfield Department of Public Works. Buildings have been demolished and utilities have been installed underground, and there have been no substantial mitigation conversations with abutters. Since the local permitting process is inadequately addressing our concerns, we ask that MEPA fulfill its obligation to mandate mitigation for outstanding issues before approving this Notice of Project Change.

Briarwood Thirteen, LLC owns property located at 55 State Street on the corner of State Street and the proposed MGM Way, with through access to Bliss Street, directly west of the proposed MGM development (see Figure 1). The site features Class A office space with access to Main Street via Bliss Street and State Street, access to Route 91 NB via the State Street and East Columbus Avenue intersection, and access to Route 91 SB via State Street and West Columbus Avenue. Currently, there is a 90% vacancy rate at 55 State because of the casino project. Prospective tenants do not want to rent next to a construction site and the street closures, changes in the site plan, and general indecision surrounding this project have created devastating economic impacts to Briarwood Thirteen, LLC’s property.

Listed below is a summary of our concerns. Because of the remaining unresolved issues, we believe further mitigation from MGM is appropriate before the Notice of Project Change is approved. We

request that each concern be thoroughly reviewed and resolved prior to the approval of this Notice of Project Change. Most of these issues are not new issues and they are issues that we have previously brought to the attention of MGM, the Massachusetts Gaming Commission, MEPA, and MGM's design consultants.

Site Plan Changes

Briarwood Thirteen, LLC is concerned with the impacts caused by changes in the access and egress to the MGM Casino site. To be clear, Briarwood Thirteen, LLC has had previous concerns with being effectively encircled by MGM-related traffic on State Street, MGM Way, and Bliss Street. Now, the most noticeable issue is the relocation, and therefore addition, of bus traffic to MGM Way. Page eight of the Narrative states, "MGM Springfield has relocated the bus depot from the periphery of the site near Howard Street to a new location directly in front of the casino doors along MGM Way." This means all buses will now drive directly by Briarwood Thirteen, LLC property. This is in addition to all vehicles using the valet service, and more significantly, all vehicles accessing the parking garage from the north via State Street to MGM Way to Bliss Street. The proposed changes in the Notice of Project Change now increase the impacts to Briarwood Thirteen, LLC property from MGM Way, in addition to the already significant impacts on Bliss Street.

Additionally, Briarwood Thirteen, LLC is concerned that bus parking has been removed from the site plan, which we assume means buses will be parked offsite. Offsite bus parking will cause twice as many bus trips on State Street, MGM Way, and Bliss Street. Buses will have to access the site to drop off passengers, leave the site, and then return to pick up passengers and leave again. If the buses were parked onsite there would be only two trips per bus: one to access the site and one to leave the site. Although this may not impact trip generation numbers, it does impact Briarwood Thirteen, LLC and abutters along Bliss Street, which is not designed to handle this volume of traffic.

The repositioned bus location and increased number of bus trips will both impact a heavy pedestrian zone at the casino doors along MGM Way. Needless to say, Briarwood Thirteen, LLC is concerned about the safety of their employees in close proximity to such a highly trafficked area without any mitigation from Blue Tarp Development.

In addition to the problems raised by changes to the project since the FEIR, the following are previous concerns we have raised that have not been addressed. We urge MEPA to mandate mitigation for these impacts before approving the Notice of Project Change.

Outstanding Concerns

Transportation

1. In general, State Street was not mentioned at all in the Notice of Project Change, which we assume mean no changes have been made to Blue Tarp Redevelopment's plans in regards to this street. Briarwood Thirteen, LLC is concerned that the following outstanding issues regarding State Street will not be addressed or mitigated.
2. We are extremely concerned that "State Street is anticipated to serve as a primary access/egress roadway for entering and exiting the casino and hotel Project." This means the Briarwood Thirteen, LLC property will be bordered by two roadways that experience regular heavy traffic (Bliss and State). Additionally, the Proponent proposes creating another right-of-

way (MGM Drive) directly north of Briarwood Thirteen, LLC, effectively encircling the property in moving vehicles. This is a public safety concern considering the significant amount of pedestrian traffic in the area.

3. Construction of State Street should occur at night to minimize impacts on surrounding businesses and more specifically to minimize the amount of time access to the Briarwood Thirteen, LLC site from State Street is prohibited.
4. The addition of bicycle sharrows is inadequate for State Street. Bicycle lanes should be incorporated into the street design.
5. We insist the Proponent implements an effective Transportation Monitoring Program to minimize impacts on surrounding businesses throughout the construction process

Water Supply

6. Water service should not be interrupted during business hours. This is a matter of life safety as shutting off service would incapacitate the Fire Department in the event of a fire.
7. A comprehensive water service model is still needed for the entire area to assess impacts and mitigation for both domestic supply and fire protection.

Wastewater

8. We insist that backflow preventers are provided on sewer laterals of all buildings connecting to the existing discharge line to protect existing developments from the significant increased wastewater flow from the MGM Casino.

Stormwater

9. There is mention in the FEIR that the project will implement Massachusetts Water Conservation Standards. We request a list of which standards will be implemented.
10. There is a statement by the Proponent about the inclusion of Low Impact Development strategies and stormwater BMPs to minimize the project's contributions into the CSO. We request further detail about which strategies and what BMPs will be used.
11. We request the Proponent conduct an analysis of how these Low Impact Development and BMPs will perform on this project site with regards to water both stormwater quantity and quality since this information was missing in the FEIR.

Site

12. The updated Site Plan shows the Casino Generators remain between Bliss Street and Howard Street, in close proximity to Briarwood Thirteen, LLC. Generators of this type require frequent testing and if they are to be located that close to a sensitive receptor such as an office building, there needs to be substantial sound mitigation so that the generator testing does not disrupt the use of the office building by its tenants.

Briarwood Thirteen, LLC
55 State Street Springfield, MA
MEPA NPC Comments
EEA #15033 – MGM Springfield Casino
November 9, 2015

Page 4 of 5

We thank you for the opportunity to submit these comments for your consideration. We believe that the alterations provided in the Notice of Project Change require substantially more work and consideration before approval. As proposed, the development will have significant impacts on the Briarwood Thirteen, LLC property and no substantial mitigation has been proposed. We urge you, on behalf of the Massachusetts Environmental Protection Act, to closely review our list of concerns and honor the obligation of MEPA to mandate the requisite mitigation before approving the Notice of Project Change.

Sincerely,

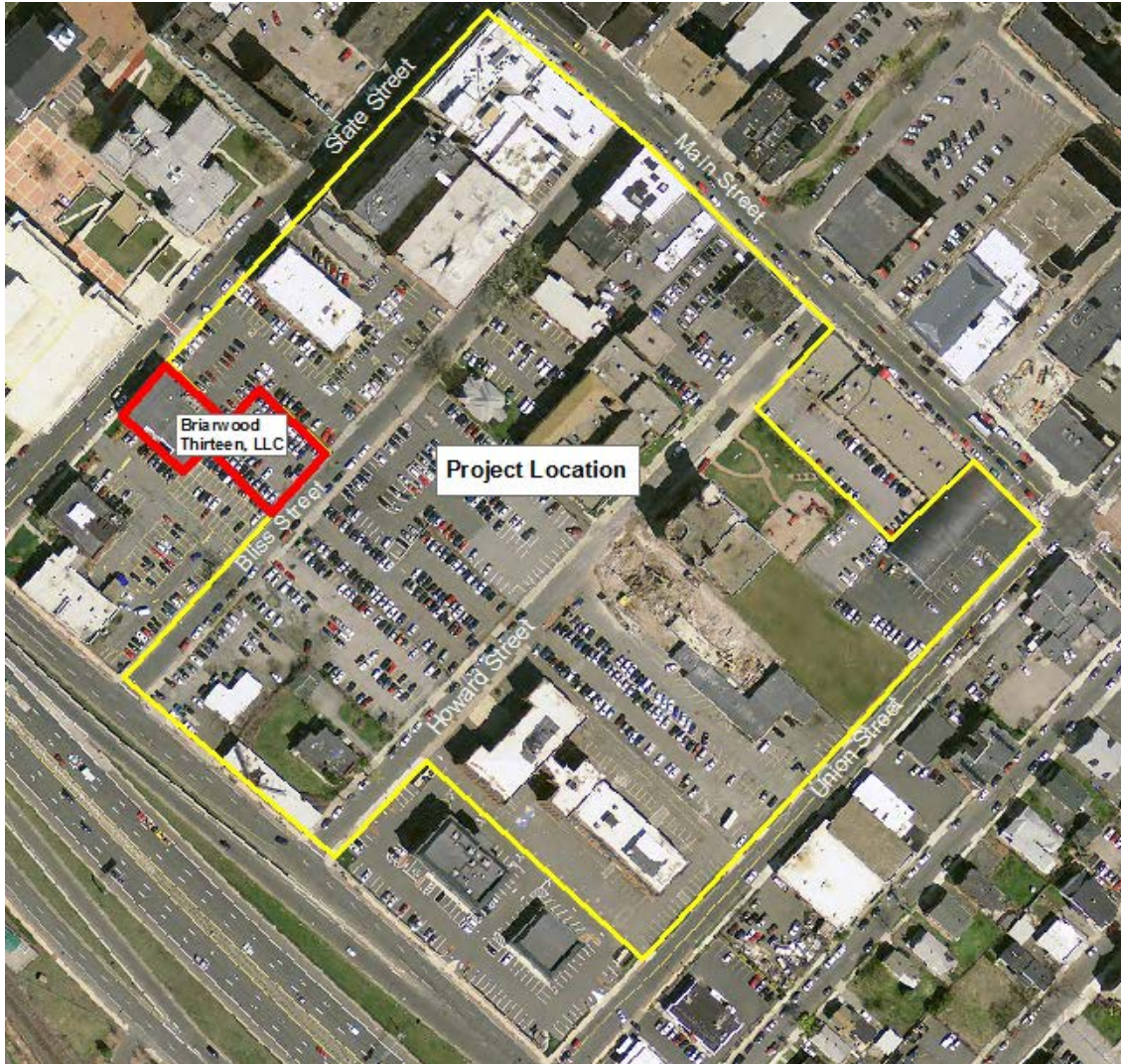
Beals Associates, Inc.



Lawrence M. Beals, Principal

cc: Lester Seidman, Briarwood Thirteen, LLC
Jeffery Roberts, Esq.

Figure 1



Location of Briarwood Thirteen, LLC (Recreated MGM Springfield DEIR Image)



246 Cottage St., Springfield, MA 01104-3540
Tel. 413-737-6992 · Fax 413-731-5852

November 4, 2015

Secretary Matthew A. Beaton
Executive Office of Energy and Environmental Affairs (EEA)
Attn: Holly Johnson
MEPA Office
100 Cambridge Street, Suite 900
Boston MA 02114
Fax: 617-626-1181

RE: Notice of Project Change
MGM Springfield, EEA #15033

Dear Secretary Beaton:

Pride Stores LLC (“Pride”) respectfully submits the following comments in response to the Notice of Project Change submitted on behalf of Blue Tarp reDevelopment LLC for the MGM Springfield project.

As previously stated by Pride, the proposal does not include traffic improvements. The proposal removes crosswalks, reduces shoulders, and creates an unsustainable burden on certain roadways and intersections in the City of Springfield, particularly Union Street and the intersection of Union Street and East Columbus Avenue.

Pride is the operator of a gas station and convenience store with a Subway and Dunkin Donuts drive-thru on the southeastern corner of the intersection of East Columbus Avenue and Union Street.

Despite the strong encouragement in the FEIR to “establish dialogue with each abutter to clarify potential project-related impacts, proposed mitigation measures, and to seek to remedy additional impacts to the extent the Proponent is legally obligated to do so.” In addition, the Proponent was encouraged to “work with...abutting landowners...through project design, permitting and construction commencement to avoid, minimize and mitigate project-related traffic and transportation impacts.” The Proponent has refused to meet and failed to discuss these changes with Pride. As such, this Notice of Change is the first and only time the Proponent has submitted its proposed alterations for review and comment. Pride provides the following in response.

UNION STREET AND EAST COLUMBUS AVE.

Parking Garage

The redesign of the parking garage creates a heightened problem on Union Street. The Proponent acknowledges that more vehicles are likely to utilize Union Street as an exit from the garage, but alleges the change is minimal without providing proof. Prior studies have shown the anticipated majority of the patrons will be coming from south of Springfield and therefore exiting from the garage to utilize Interstate 91 South. Those patrons will be directed to the Union Street exit. The Proponent's claim that the redesign of the parking garage will only result in a negligible increase to traffic on Union Street seems incredulous.

The parking redesign has significantly reduced the probability that vehicles exiting the garage will utilize the Howard Street parking garage exit. The Howard Street exit will only be accessible by making an awkward left-hand turn on the down ramp. The redesign will implement signage and directions for all vehicles above the first parking level to utilize the Union Street parking garage exit to access Interstate 91.

As part of the previously proposed site plan, access for delivery trucks was proposed via a new full-access/egress driveway on Union Street approximately 430 feet northeast of East Columbus Avenue. A 140-foot long left-turn lane was proposed on Union Street at this driveway to accommodate trucks waiting to turn into the driveway. Loading/unloading of trucks was proposed to occur in the basement level of the MGM Springfield parking garage. The redesign relocates the service vehicle entrance and exit approximately 65 (sixty five) feet closer to the Union Street and East Columbus Avenue intersection. The proposed redesign also reduces the 140-foot long left-turn lane to a 100-foot long left-turn lane. The Proponent submits the reduced left-turn lane will allow for the stacking of only two trucks. Also, the street is not wide enough to add a lane therefore it will not happen and then what? In addition, this lane is now only approximately 265 feet from the Union Street and East Columbus Avenue intersection.

Both the truck exit and passenger exits from the parking garage onto Union Street will be right turn only (requiring the vehicles to travel west bound and go through the Union Street and East Columbus Avenue intersection). The relocation of this also impacts the visibility on Union Street, including the sightline from other driveways on Union Street. With the proposed changes, the north side of Union Street would have three driveway exits within 300 feet of the Union Street and East Columbus Avenue intersection. Union Street is only 1 lane in each direction now and extremely busy. It is incredulous to believe that the additional traffic can be added without causing serious problems.

As previously noted in Pride's comments to MGM's Draft Environmental Impact Report, it is currently very difficult and dangerous to exit from Pride's Union Street driveway. The increase of vehicles and relocation of the driveways from the parking garage will exasperate this issue. The Proponent's response at the time was that patrons could simply utilize other driveways. This response does not address the concerns and is unacceptable. The Proponent should not be allowed to prioritize its driveways and points of access and egress to the detriment of an abutting landowner (Pride).

Road Safety Audit

The Proponent's proposed road safety audit is neither reasonable nor appropriate. Pride notes that the Proponent, in its response to comments submitted by Pride in relation to the FEIR, indicated that it is:

“committed to conducting a Road Safety Audit along Union Street between Main Street and West Columbus Avenue, which includes the intersection with East Columbus Avenue as part of the 25 percent design process for off-site roadway improvements. Representatives of the City of Springfield Police Department, Fire Department, State Police Department, direct abutters, and other concerned citizens will be invited to attend this RSA to provide input on the factors impacting safety and the improvements necessary to alleviate the collision patterns.” (FEIR Response to Comments, 9-127). Pride was never notified or invited to this meeting, if it was held.

The Proponent, in its Notice of Change, now indicates:

“The MGM design team, MassDOT, City staff, and other independent consultants and stakeholders will be conducting Road Safety Audits in eight different areas in late October and early November.” (Notice of Project Change, p 11). To date this has not been done and the Notice of Change should not be approved until these issues have been resolved.

To verify the concerns and feasibility of the traffic plans and roadway changes, the Notice of Change should not be approved until the appropriate Road Safety Audits have been completed. Allowing the proposed changes prior to the audits would contradict the purpose and intent of the requirement that such proposed changes are subject to review by this office. The Road Safety Audit should include, as pledged, the invitation and participation of abutting landowners and other concerned citizens.

Hotel Relocation

The relocation of the hotel will likely impact the hotel drop-off/pick-up area. The Proponent initially proposed valet parking, and hotel drop-off/pick-up to be along Bliss Street near the main entrance to the hotel. The hotel is now proposed to be located at Main Street and Howard Street. Vehicles that seek to access the parking garage after dropping-off patrons to the hotel will likely now utilize Union Street to loop around the project area and access the parking garage entrance. This will further exacerbate the existing and proposed traffic problems on Union Street.

The redesign proposes to eliminate the bus entrance and drop-off area along Union Street. The proposed relocation of the bus drop-off area is along Bliss Street. However, the new proposal reduces the bus drop-off/parking area from 8 buses to a drop-off only area accommodating 3 buses. In addition, the Proponent has failed to determine where buses will wait to pick-up or drop-off its passengers. Such an uncertainty should not be acceptable.

Traffic Control Agreement Ignored

A Traffic Control Agreement is in place between the City of Springfield and Massachusetts Department of Transportation for the Union Street and East Columbus Avenue. Previously, Pride was advised that approvals for any improvements would be required to be filed with the Boston Traffic Engineer at MassDOT and District 2.

In fact, the FEIR Certificate advised the Proponent to inspect the existence of the agreement and compatibility and determine how the proposed cross-section modifications impact the Traffic Control Agreement. The Proponent has failed to do this.

Pride's Prior Request to Improve Union Street Denied

In 2008, Pride engaged a traffic engineering firm to recommend improvements to Union Street to reduce existing congestion. The study concluded that widening Union Street was necessary and the City of Springfield and MassDot concurred, however they rejected the concept because "there was no room to widen Union Street."

It is therefore again incredulous to believe that this project will add a significant amount of traffic to Union Street, and therefore will exacerbate the existing congestion. No improvements are planned other than to "restripe," and this will not improve the congestions whatsoever. Worse, the project proposes "adding a bicycle lane," but this can only be done at the expense of reducing the roadway which also will make the existing traffic problem worse. The project in fact proposes to add a bicycle lane without showing where it will go.

Conclusion

It is Pride's belief that the submitted Notice of Project Change is inadequate and the proposal continues to fail to meet clear and well-established mandated standards related to traffic and safety.

Approval of this Notice of Project Change which continues to ignore or provide acceptable solutions should simply not be acceptable. Approval of this project without solving these problems will create a dangerous precedence for all future projects in the State and allow reconsideration of previously denied proposals throughout the State.

Pride requests this letter as well as the the previously supplied comments from Pride and the report from our traffic consultant, be included in the official record.

Truly Yours,



Robert L. Bolduc

Jeffrey A. Burstein
1331 E. Columbus Ave.
Springfield, MA 01105

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
100 Cambridge Street, Suite 900
Boston, MA 02114
Via Email: Johnson, Holly S (ENV) <holly.s.johnson@state.ma.us>

November 9, 2015

**Re: Comments To: Notice of Project Change EEA #15033 –
“MGM Springfield”/ Blue Tarp reDevelopment LLC_**

I am a co-owner of a mixed use property located at 1317-1343 East Columbus Avenue and 90 Howard Street which also houses my business. The property is located on East Columbus Avenue in between Bliss Street and Howard Street (the entrance and exit to the “MGM Springfield” parking garage).

1. The new traffic pattern will cause inbound buses, extended vans, and limousines to cross in front of our property on East Columbus Avenue then make a right hand turn onto either Bliss or State Street. E. Columbus Ave. is only a two Lane Rd. in front of 1317 to 1343 E. Columbus Ave. The new traffic pattern will cause buses to be queued in front of said property causing emission and noise pollution as well as shadowing in the windows of the building. The traveling buses which were originally routed by way of Union Street will also cause excessive vibration to the building which sits very close to the road.
2. The new bus pattern will also cause traffic snarls on Columbus Avenue as buses attempt ingress and egress on Bliss and Howard Streets respectively. Limousines, extended vans and buses will have to nose out into traffic on East Columbus Avenue because of the geometry of the intersection of Howard and East Columbus Avenue, potentially tying up two lanes of traffic.
3. Moving the entrance to the parking garage on Bliss Street 50 Feet Closer to East Columbus Ave. and at the same time adding bus traffic will cause extended lines backing up onto East Columbus Avenue. This combined with the elimination of the previously promised 12 foot turning lane that was

recommended by the proponents own traffic study (which is an exhibit to the HCA) and listed under changes proposed to East Columbus Ave. in both the ENF and DEIR will cause traffic to back up and cause potentially catastrophic accidents on East Columbus Avenue, Bliss, and Howard Streets.

4. The new proposed oversized parking spaces immediately behind 1317 to 1343 E. Columbus Ave. and 90 Howard St. should not be allowed to accommodate oversized vehicles. Those vehicles especially in the New England winter will need time to warm up and will cause excessive emissions and noise. The building which has five two and three-bedroom residential units should not have to endure the noise and fumes that these vehicles will cause. If any parking is allowed in that area it should be handicapped, hybrid vehicle and metered parking during the day. Residential tenants should be allowed to park there at night (also see comment 5 below).

5. The property at 1317 to 1343 E. Columbus Ave. and 90 Howard Street does not have its own parking and has relied on the parking on Bliss Street and Howard Street along with the 9 1/2 acres of parking that would be eliminated as part of this project. If Bliss and Howard Street are allowed to be closed to through traffic to Main street and on street parking is taken away, the residential tenants will have no place to park overnight. Also, the invitees and guests will have no place to park to patronize the law offices that are located in the building. Any promised parking for the city or private businesses should be granted a recorded easement for enforcement purposes. Especially given the proponents propensity to change and downsize the project. Once the Bliss and Howard Streets are terminated and on street parking is removed. The community will lose that access forever for the private benefit of MGM Springfield. MGM should therefore grant an easement for parking, including overnight, in exchange for the accommodations being made to MGM to the detriment of 1317-1343 E. Columbus Ave. 90 Howard Street and the greater community. If the easement is not granted, then MGM should redesign the garage and traffic pattern so as not to disturb access and parking for the built environment.

6. The ENF indicated a loss of 1000 existing parking spaces. Originally approximately 4800 new parking spaces were planned. The amount of spaces have been cut down several times to what is now 3,375 parking spaces. Given the fact that the busy courthouse does not have its own parking, the reductions will create added parking pressure for the built environment. The incremental increase in parking once the garage is built is only 2,375 from what was reported in the original ENF.

7. The signs on the garage should be eliminated or at least not allowed to be illuminated as the lights will shine into the residential apartments which they will be facing located in the rear of the building located at 1317 - 1343 E. Columbus Ave. and 90 Howard St. causing a nuisance to the tenants.

8. The parking accommodations do not adequately provide for those that have difficulty walking, the handicapped, and the elderly residents and patrons of the property located at 1317- 1343 East Columbus Avenue. Construction has already begun including but not limited to placing fencing over the sidewalk and taking away parking on Howard Street and Bliss Street. Arrangements should be made for adequate parking for both the residential tenants and the businesses during construction and after. The apartment units need to be accessible to bring up groceries and for overnight parking within the vicinity. The businesses are often open past typical office hours and need parking at all times.

9. The parking garage lacks elevators at the East Columbus Ave. side of the garage which makes it an extremely long walk for anyone parking in the garage and wishing to go towards E. Columbus Ave. or the riverfront. An elevator should be positioned next to the stairs and exit onto Howard Street to

promote the walkability to the riverfront, courthouse, and businesses on E. Columbus Ave. This is especially important since no self-parking is planned on the ground level of the garage.

10. The property at 1317 -1343 E. Columbus Ave. and 90 Howard St. needs to be accessible for sign maintenance, deliveries, rubbish pick up, emergency services and mail delivery. The new bus, limousine, and extended van pattern will interfere with emergency vehicles and large delivery trucks that need to stop on East Columbus Avenue in order to deliver supplies e.g. paper, water, mail, UPS, Fed Ex, etc.

11. The new radial curve on Bliss Street will bring the street closer to the property at 1317 -1343 E. Columbus Ave. and 90 Howard St. this combined with moving the parking garage entrance on Bliss Street 50 feet closer to East Columbus Avenue will cause increased noise and vehicle pollution at the mixed-use building.

12. The massive newly constructed power supply and transformer behind the property at 1317-1343 E. Columbus Ave. and 90 Howard St. are not depicted. We are concerned with the proximity to the property and the oils that are required for the massive transformer. We also have maintenance concerns both during the day and at night, as the transformer is very close to the apartments and balcony. The transformer and equipment is also in the area of the proposed oversize parking although it is not depicted on the proponent's documents. It will also eliminate parking spaces that are depicted on the proponent's documents, further reducing the amount of the available parking to the community.

13. It is unclear what is proposed for the area in between the parking behind 1317-1343 E. Columbus Ave 90 Howard and the parking garage. It appears to be generators, which should not be so close to the residential apartments. The apartments are the only residences located within the boarder of East Columbus Avenue, State Street, Main Street, and Union Street. Any central plant or generator or any other emission generating equipment should be located somewhere else on the 14.5 acre property and not close to the only residences located within the above mentioned two block radius.

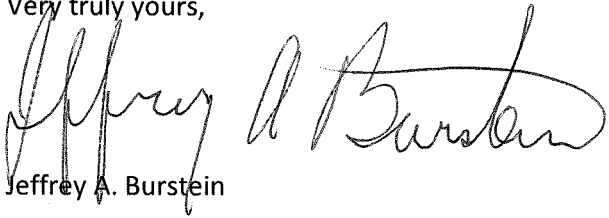
14. The proponent has demolished two buildings on adjacent property to the 1317-1343 E. Columbus Avenue and 90 Howard Street. They have also removed tanks and removed and replaced dirt from the property. The area that was worked on smells like oil/paint thinner. Within the last two weeks a dead pigeon appeared on the sidewalk adjacent to my property. I request that all hazardous materials be identified along with removal plans shared with the owners of our property. I also believe that the proponent should be responsible for environmental testing on our property to determine if the work that they have performed has contaminated our property.

15. The intersections of East Columbus and Bliss and East Columbus and Howard should be audited as part of any intersection audits that are occurring in the vicinity of the project.

16. The proponent has never had meaningful conversations to address the negative impacts that this project will bring to the property which I co-own and how to best mitigate those negative impacts either before or after the notice of project change.

I thank you for the opportunity to comment on the Notice of Project Change and I invite you to view the property and areas involving my comments so that you can better understand the areas of concern that I have.

Very truly yours,

A handwritten signature in black ink, appearing to read "Jeffrey A. Burstein". The signature is fluid and cursive, with a long horizontal stroke at the end.

Jeffrey A. Burstein

BEALS · ASSOCIATES INC.

2 PARK PLAZA, SUITE 200, BOSTON, MA 02116
PHONE: 617-242-1120

November 9, 2015

Secretary Matthew A. Beaton
Executive Office of Energy & Environmental Affairs
MEPA Office
Attn: Holly Johnson
100 Cambridge Street, Suite 900
Boston, MA 02114

Submitted via email and hand delivery on November 9, 2015

**Subject: Colvest/Columbus Spfld, LLC
Notice of Project Change
MGM Springfield, EEA #15033**

Dear Secretary Beaton:

We are writing on behalf of Colvest/Columbus Spfld, LLC in regard to the Springfield, Massachusetts MGM Casino Notice of Project Change EEA Number 15033. Over the past two years, we have reviewed and commented on both the DEIR prepared by Epsilon Associates dated December 16, 2013 and the FEIR prepared by Epsilon Associates dated November 6, 2014. We have met directly with Blue Tarp Redevelopment – the development arm of MGM – several times. We have provided testimony to the Massachusetts Gaming Commission, and the Commission’s General Counsel responded in a letter to us that “the Commission believes many of the issues raised can be dealt with more efficiently and more appropriately during the MEPA process and the license and permitting processes that will follow.” Now we have reached that point in the process and yet development proceeds without the majority of our concerns addressed. To date, Blue Tarp Redevelopment has received eight Building Permits and sixty-two permits from the Springfield Department of Public Works. Buildings have been demolished and utilities have been installed underground, but there have been no substantial mitigation conversations with abutters. Since the local permitting process is inadequately addressing our concerns, we ask that MEPA fulfill its obligation to mandate mitigation for outstanding issues before approving this Notice of Project Change.

Colvest/Columbus Spfld, LLC’s property, located at 1259 East Columbus at the corner of East Columbus Avenue and Union Street, with through access to Howard Street, is directly southwest of the proposed MGM development (see Figure 1). The site features Class A office and retail space with access to Main Street via Union Street and Howard Street, access to Route 91 NB via the Union Street/East Columbus Avenue intersection, and access to Route 91 SB via Union Street and West Columbus Avenue.

In the FEIR Certificate, you wrote:

I strongly encourage the Proponent to establish a dialogue with each abutter to clarify potential project related impacts, proposed mitigation measures, and seek to remedy additional impacts to the extent the Proponent is legally obligated to do so. The Proponent should continue to

evaluate design or operational measures to ameliorate project-related impacts to abutting properties, including but not limited to, design treatments to reduce the visual impact of the garage, confirmation of the constructability of the garage from entirely within the Proponent's property, mitigation measures to reduce noise, vibration or emissions associated with the proposed central plant, maintenance of safe pedestrian access, and enhanced communication protocols during the construction period.

You continued:

I note the specific concerns expressed by Colvest/East Columbus, LLC regarding potential conflicts with traffic exiting this property's driveway to the through lane onto Union Street due to the addition of the westbound right-turn only lane and the potential for cut through traffic exiting the project garage onto Howard Street. The Proponent should specifically review these concerns with respective abutters and the City of Springfield prior to finalizing the project's mitigation plan to determine if there are additional opportunities to mitigate potential impacts.

Colvest/Columbus Splfd, LLC is still waiting to have meaningful conversations with Blue Tarp Redevelopment about mitigating impacts to its property and request you withhold approval of this Notice of Project Change until those discussions occur.

Listed below is a summary of all our concerns. We request that each concern be thoroughly reviewed and resolved prior to the approval of this Notice of Project Change. Because of the remaining unresolved issues, we believe further mitigation from MGM is appropriate before the Notice of Project Change is approved. Most of these issues are not new issues and they are issues that we have previously brought to the attention of MGM, the Massachusetts Gaming Commission, MEPA, and MGM's design consultants.

Parking Garage

The major concern of Colvest/Columbus Splfd, LLC remains to be the size and massing of the proposed parking garage. Although the proponent states, "The parking garage has been reduced by one level to a seven-story parking garage" on page 3 of the Narrative, in reality the size and massing of the garage has not changed. The proponent simply removed the basement level of the garage, which provides no mitigation or beneficial impact for anyone except the proponent who benefits from the cost savings of no longer having to excavate for the basement level. Furthermore, the Initial Site Plan Submission dated October 19, 2015 on the Springfield Redevelopment Authority website creates confusion as it shows eight levels of parking in the garage (see Figure 2). The basement level is no longer included but all 3,375 spaces mentioned in the Notice of Project Change are accounted for over eight levels of parking – not "seven stories" as claimed in the narrative.

The fact remains that the parking garage, as proposed, is 100 feet tall and 640 feet long. This is not the appropriate size even for this part of downtown Springfield, particularly when it is placed directly on the property line with no setback whatsoever. There is no buffer, setback, screening or any other form of mitigation between the massive wall and the Colvest/Columbus Splfd, LLC building located only 25 feet away. There are ways to shape the massing of the garage to be less disruptive to abutters. We propose Blue Tarp Redevelopment tiers the parking garage to allow light and air to reach the Colvest/Columbus Splfd, LLC property for the maximum amount of time possible.

The removal of the basement level raises concerns regarding truck loading, as well. Truck loading/unloading was previously proposed to be located in the basement level of the garage, but according to the Notice of Project Change these activities will now occur on the first floor. Colvest/Columbus Spfld, LLC is concerned this new location will be increasingly disruptive to their day-to-day operations. Moreover, the truck driveway on Union Street will be shifted 65 feet closer to East Columbus Avenue as compared to the prior plan, which is alarming not only because truck traffic will be closer to the Colvest/Columbus Spfld, LLC property, but because it will be closer to the intersection of Union Street and East Columbus. Currently, this intersection is ranked the 15th most dangerous intersection in the Pioneer Valley and the proposed changes will exacerbate the serious existing problems.

The shift in truck loading/unloading to the first floor of the garage caused the relocation of the large van parking that was previously shown on the first floor to either side of the central plant. The new parking location between Bliss Street and Howard Street is directly to the west of the Colvest/Columbus Spfld, LLC property. This surge in van traffic in combination with the escalation of vehicular traffic exiting the garage to Union Street will effectively increase traffic on both sides of the Colvest property. Yet again, Blue Tarp Redevelopment is not mitigating the impacts on the abutter but is, in fact, redistributing and increasing these impacts on both sides of the property. We recommend that instead of partially closing Howard Street as proposed, it should be closed in its entirety between the parking structure and East Columbus Avenue. Doing so would alleviate the detrimental impacts to the Colvest property as described above.

The aforementioned increase in vehicular traffic exiting the parking garage onto Union Street is a result of the newly proposed exterior ramp along the southern wall of the garage, immediately abutting the shared property line with Colvest/Columbus Spfld, LLC. Not only will this ramp bring vehicles to the literal edge of the development, but it will further increase the impacts on Union Street and the dangerous intersection with East Columbus Avenue. We have stated in previous letters that we are concerned about the capacity of Union Street as it is not designed to handle this level of traffic. Instead of mitigating the impacts on a serious existing issue, Blue Tarp Redevelopment is proposing to significantly aggravate the problem.

In addition to the problems raised by changes to the project since the FEIR, the following are previous concerns we have raised that have not been addressed. We urge MEPA to mandate mitigation for these impacts before approving the Notice of Project Change because to-date, none of these issues has been considered by MGM despite numerous requests by Colvest/Columbus Spfld, LLC.

Outstanding Concerns

Transportation

1. The proposed reconfiguration of Union Street includes adding a westbound right-turn only lane at the intersection of Union Street and East Columbus Street. Adding a lane at this location would make exiting the Colvest/Columbus Spfld, LLC property more dangerous because drivers looking for the through lane will have to cross a lane of traffic. Additionally, access and egress from the Colvest/Columbus Spfld, LLC site is more likely to be blocked by traffic queuing at a red light.

2. In the Proponent's 2024 and 2034 Sensitivity Analysis in the FEIR Union Street westbound repeatedly received a Level of Service D, which proves that the capacity is inadequate and traffic is likely to back up blocking the Colvest/Columbus Spfld, LLC site.
3. The Proponent responded that it will identify additional measures to enhance safety at the Union Street/East Columbus Avenue intersection as part of the 25 percent stage of off-site improvements, but we believe this is a serious enough concern to warrant attention now.
4. The exclusive pedestrian movement cycle is being removed from the Union Street / East Columbus Avenue / I-91 NB On-Ramp signalized intersection. This is detrimental to site access as a number of the Colvest/Columbus Spfld, LLC tenants access the site from the riparian parkland west of Route 91. Additionally, Basketball Hall of Fame visitors frequently use this intersection, which creates a serious public safety issue. Removing the exclusive pedestrian movement, even when replacing it with concurrent pedestrian signals, will put pedestrians in direct conflict with turning vehicles.
5. Previously, the Proponent suggested erecting a "No Left Turn" regulatory sign in Howard Street to prevent exiting traffic from the garage from cutting through the Colvest/Columbus Spfld, LLC property to Union Street. We then suggested a traffic island in Howard Street would be more appropriate. Neither option made it onto the most current Site Plan and after further study, we believe both would be inadequate solutions. We now recommend Howard Street be closed from the parking garage to East Columbus Avenue. Once the street is discontinued, the land will be divided at the roadway centerline and each half will be returned to the abutter on either side.
6. The Main Street/Union Street intersection has a higher vehicle crash rate than the state and district averages, which should be addressed by the Proponent since the proposed project will only add to the problem.
7. Similarly, we insist that the Proponent develop and implement an effective Transportation Monitoring Program to minimize impacts on surrounding businesses throughout the construction process. That plan should be developed as part of the MEPA process.

Water Supply

8. Water service should not be interrupted during business hours. This is a matter of life safety as shutting off service would incapacitate the Fire Department in the event of a fire.
9. A comprehensive water service model is still needed for the entire area to assess impacts and mitigation for both domestic supply and fire protection.

Wastewater

10. We insist that backflow preventers are provided on sewer laterals of all buildings connecting to the existing discharge line to protect existing developments from the significant increased wastewater flow from the MGM Casino.

Stormwater

11. There is mention in the FEIR that the project will implement Massachusetts Water Conservation Standards. We request a list of which standards will be implemented.
12. There is a statement by the Proponent about the inclusion of Low Impact Development strategies and stormwater BMPs to minimize the project's contributions into the CSO. We request further detail about which strategies and what BMPs will be used.
13. We request the Proponent conduct an analysis of how these Low Impact Development and BMPs will perform on this project site with regards to water both stormwater quantity and quality since this information was missing in the FEIR.

Site

14. The updated Site Plan shows the Casino Generators remain between Bliss Street and Howard Street, adjacent to Colvest/Columbus Spfld, LLC. Generators of this type require frequent testing and if they are to be located that close to a sensitive receptor such as an office building, there needs to be substantial sound mitigation so that the generator testing does not disrupt the use of the office building by its tenants.
15. Due to the height and location of the proposed parking structure, the Colvest/Columbus Spfld, LLC property will not be exposed to the sun until mid-day. Not only can this be psychological damaging to the existing tenants, but it also poses a safety threat in the winter since ice will not melt sufficiently. Additionally, any ice falling from the MGM parking structure can only land on the Colvest/Columbus Spfld, LLC property since the building is proposed to be constructed directly on the property line. As per the Springfield Site Plan Review criteria, new buildings must be designed to “Ensure adequate light and air quality of adjacent properties and minimize detrimental visual impacts on adjacent uses and public streets, parks, buildings, and other public places”. MGM has not addressed this criterion and has not demonstrated that it can comply. We believe that it is appropriate for MEPA to mandate that MGM consider the effect of its proposed structure on all abutters since the right to adequate light and air is a fundamental right.
16. Preliminary graphics show that the wall of the parking garage will include large-scale lighted signage. Some of these images dwarf the size of the Colvest/Columbus Spfld, LLC building. In addition, by being located only 25 feet away from the Colvest/Columbus Spfld, LLC tenant’s offices, these lit signs have the potential to be distracting, annoying, and may hurt the existing tenants’ abilities to work in their offices, particularly during the winter months.
17. There should be electronic signs at all garage exits to alert pedestrians when cars are exiting the building due to the close proximity of the structure’s walls to the public sidewalk. There is no sight distance until the vehicle exits the garage directly onto the public sidewalk. The exits should also have physical barriers that allow cars and buses to only exit the garage when the existing sidewalks are clear of pedestrians and it is safe and clear for the vehicles to pass without endangering pedestrians.

Colvest/Columbus Spfld, LLC
1259 East Columbus Avenue Springfield, MA
MEPA NPC Comments
EEA #15033 – MGM Springfield Casino
November 9, 2015

Page 6 of 8

We thank you for the opportunity to submit these comments for your consideration. We believe that the alterations provided in the Notice of Project Change require substantially more work and consideration before approval. As proposed, the development will have significant impacts on the Colvest/Columbus Spfld, LLC property and no substantial mitigation has been proposed. We urge you, on behalf of the Massachusetts Environmental Protection Act, to closely review our list of concerns and honor the obligation of MEPA to mandate the requisite mitigation before approving the Notice of Project Change.

Sincerely,

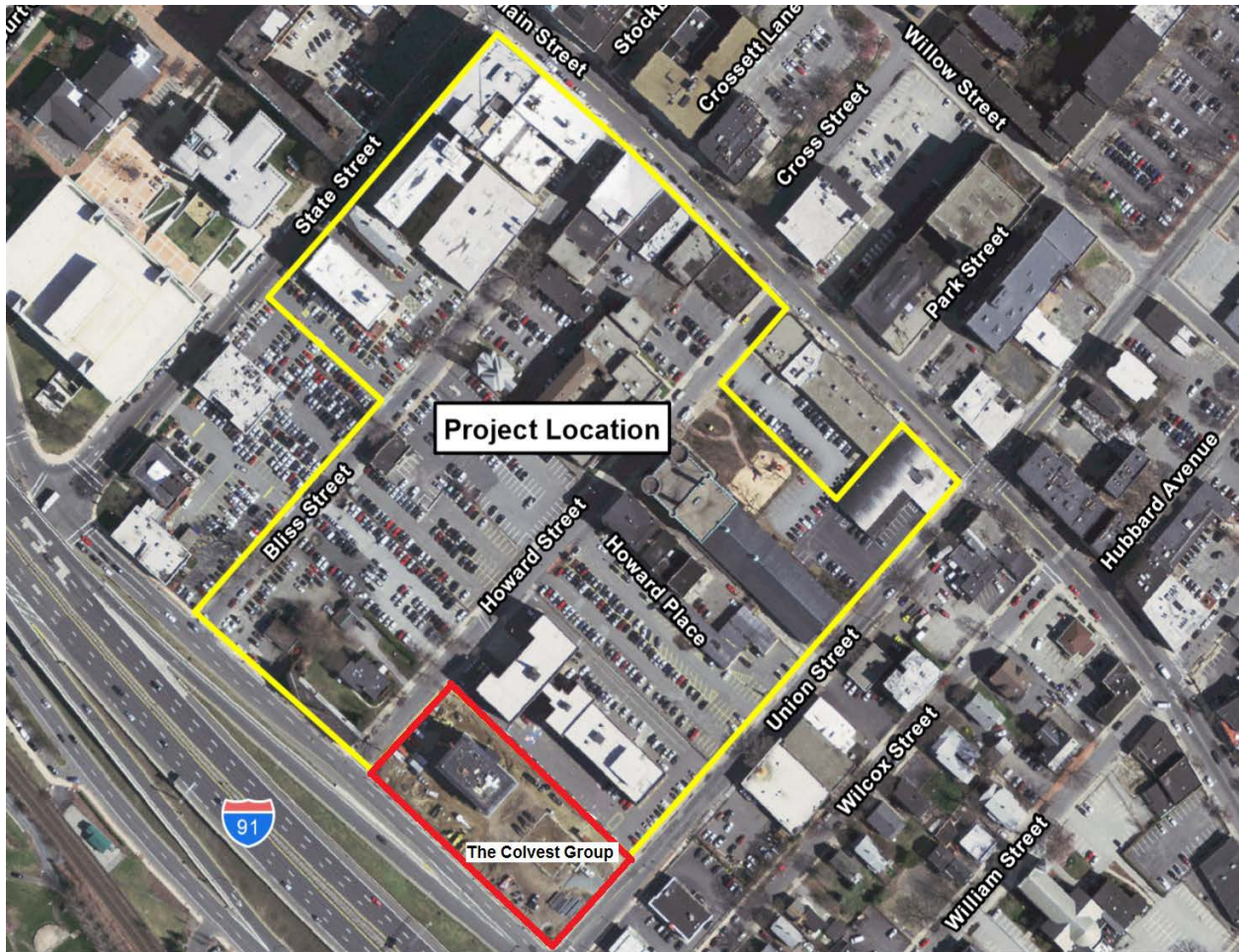
Beals Associates, Inc.



Lawrence M. Beals
Principal

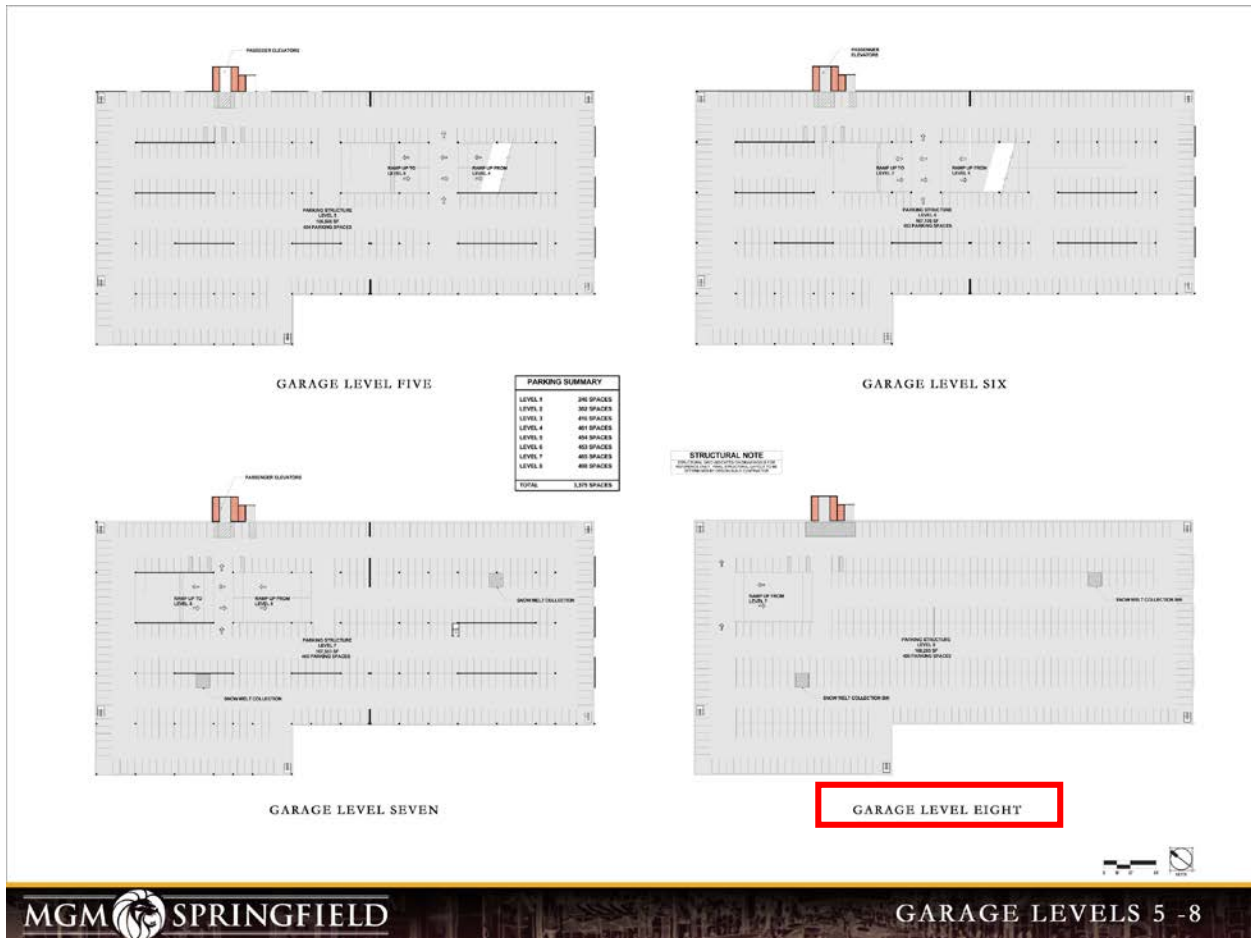
cc: Frank Colaccino, Colvest/Columbus Spfld, LLC
Jeffrey W. Roberts, Esq.
Michael Mathis, MGM Springfield Redevelopment, LLC

Figure 1



Adapted from MGM Springfield DEIR Figure 3-2, prepared by Epsilon Associates, Inc.

Figure 2



Adapted from MGM Springfield Initial Site Plan submission dated October 19, 2015 (emphasis added)

BEALS · ASSOCIATES INC.

2 PARK PLAZA, SUITE 200, BOSTON, MA 02116
PHONE: 617-242-1120

November 9, 2015

Secretary Matthew A Beaton
Executive Office of Energy & Environmental Affairs
MEPA Office
Attn: Holly Johnson
100 Cambridge Street, Suite 900
Boston, MA 02114

Submitted via email and hand delivery on November 9, 2015

**Subject: Courthouse Park Associates, Inc.
Notice of Project Change
MGM Springfield, EEA #15033**

Dear Secretary Beaton:

We are writing on behalf of Courthouse Park Associates, Inc. in regard to the Springfield, Massachusetts MGM Casino Notice of Project Change EEA Number 15033. Over the past two years, we have reviewed and commented on both the DEIR prepared by Epsilon Associates dated December 16, 2013 and the FEIR prepared by Epsilon Associates dated November 6, 2014. We have met directly with Blue Tarp Redevelopment – the development arm of MGM – several times. We have provided testimony to the Massachusetts Gaming Commission, who wrote in a response letter to us that “the Commission believes many of the issues raised can be dealt with more efficiently and more appropriately during the MEPA process and the license and permitting processes that will follow.” Now we have reached that point in the process and yet development proceeds without the majority of our concerns addressed. To date, Blue Tarp Redevelopment has received eight Building Permits and sixty-two permits from the Springfield Department of Public Works. Buildings have been demolished and utilities have been installed underground, but there have been no substantial mitigation conversations with abutters. Since the local permitting process is inadequately addressing our concerns, we ask that MEPA fulfill its obligation to mandate mitigation for outstanding issues before approving this Notice of Project Change.

Courthouse Park Associates own properties located at 33 State Street on the corner of State Street and East Columbus Avenue with through access to Bliss Street, directly west of the proposed MGM development (see Figure 1). The site features Class A office space with access to Main Street via Bliss Street and State Street, access to Route 91 NB via the State Street and East Columbus Avenue intersection, and access to Route 91 SB via State Street and West Columbus Avenue.

Listed below is a summary of our concerns. We request that each concern be thoroughly reviewed and resolved prior to the approval of this Notice of Project Change. Because of the remaining unresolved issues, we believe further mitigation from MGM is appropriate before the Notice of Project Change is approved. Most of these issues are not new issues and they are issues that we have previously brought to the attention of MGM, the Massachusetts Gaming Commission, MEPA, and MGM’s design consultants.

Site Plan Changes

The major concerns of Courthouse Park Associates center on the impacts of access and egress to the site and general circulation around the casino site. To begin with, the main driveway for the self-parking garage will remain on Bliss Street and will serve as the only entrance into the self-parking area of the garage. Moreover, the proponent admits on page ten of the Narrative that “the majority of exiting traffic is likely to utilize the main ramp toward Bliss Street.” In fact, it is estimated that the “remaining two thirds will exit the garage via the main driveway onto Bliss Street toward East Columbus,” which will increase traffic exiting Bliss Street onto East Columbus Avenue compared to the previous plan (NPC, p. 11). This means, at a minimum, over 3,000 vehicles will drive past Courthouse Park Associates on Bliss Street to access the garage and an additional 2,000 vehicles will drive by when exiting the garage. To make matters worse, the garage driveway has now been shifted approximately 50 feet towards East Columbus Avenue, meaning it is in closer proximity to Courthouse Park Associates’ property. Needless to say, we are alarmed at this level of traffic in such close proximity to their property, and more specifically to their employees, on Bliss Street without any sort of mitigation for abutters.

Additionally, bus and passenger van traffic will more heavily impact Bliss Street compared to the previous plan in the FEIR, because the Proponent has shifted bus and passenger exiting traffic from Union Street to Bliss Street. Furthermore, bus parking has been removed from the site plan, which we assume means buses will be parked offsite. Courthouse Park Associates is concerned that the offsite bus parking will lead to twice as many bus trips down State Street and Bliss Street. Buses will have to access the site to drop off passengers, leave the site, and then return to pick up passengers and leave again. If the buses were parked onsite there would be only two trips per bus: one to access the site and one to leave the site. Although this may not impact trip generation numbers, it does impact abutters along Bliss Street, which is not designed to handle substantial level of vehicle and bus traffic.

In addition to the problems raised by changes to the project since the FEIR, the following are previous concerns we have raised that have not been addressed. We urge MEPA to mandate mitigation for these impacts before approving the Notice of Project Change.

Outstanding Concerns

Transportation

1. In general, State Street was not mentioned at all in the Notice of Project Change, which we assume mean no changes have been made to Blue Tarp Redevelopment’s plans in regards to this street. Courthouse Park Associates are concerned that the following outstanding issues regarding State Street will not be addressed or mitigated.
2. We are also extremely concerned that “State Street is anticipated to serve as a primary access/egress roadway for entering and exiting the casino and hotel Project.” This means the Courthouse Park Associates property will be bordered by two roadways that experience regular heavy traffic (Bliss and State). Additionally, the Proponent proposes creating another right-of-way (MGM Drive) directly north of the Courthouse Park Associates, effectively encircling the property in moving vehicles. This is a public safety concern considering the significant amount of pedestrian traffic in the area.

3. Construction of State Street should occur at night to minimize impacts on surrounding businesses and more specifically to minimize the amount of time access to the Courthouse Park Associates site from State Street is prohibited.
4. The addition of bicycle sharrows is inadequate for State Street. Bicycle lanes should be incorporated into the street design.
5. We insist the Proponent implements an effective Transportation Monitoring Program to minimize impacts on surrounding businesses throughout the construction process

Water Supply

6. Water service should not be interrupted during business hours. This is a matter of life safety as shutting off service would incapacitate the Fire Department in the event of a fire.
7. A comprehensive water service model is still needed for the entire area to assess impacts and mitigation for both domestic supply and fire protection.

Wastewater

8. We insist that backflow preventers are provided on sewer laterals of all buildings connecting to the existing discharge line to protect existing developments from the significant increased wastewater flow from the MGM Casino.

Stormwater

9. There is mention in the FEIR that the project will implement Massachusetts Water Conservation Standards. We request a list of which standards will be implemented.
10. There is a statement by the Proponent about the inclusion of Low Impact Development strategies and stormwater BMPs to minimize the project's contributions into the CSO. We request further detail about which strategies and what BMPs will be used.
11. We request the Proponent conduct an analysis of how these Low Impact Development and BMPs will perform on this project site with regards to water both stormwater quantity and quality since this information was missing in the FEIR.

Site

12. The updated Site Plan shows the Casino Generators remain between Bliss Street and Howard Street, adjacent to Courthouse Park Associates. Generators of this type require frequent testing and if they are to be located that close to a sensitive receptor such as an office building, there needs to be substantial sound mitigation so that the generator testing does not disrupt the use of the office building by its tenants.

Courthouse Park Associates
33 State Street Springfield, MA
MEPA NPC Comments
EEA #15033 – MGM Casino
November 9, 2015

Page 4 of 5

We thank you for the opportunity to submit these comments for your consideration. We believe that the alterations provided in the Notice of Project Change require substantially more work and consideration before approval. As proposed, the development will have significant impacts on the Courthouse Park Associates property and no substantial mitigation has been proposed. We urge you, on behalf of the Massachusetts Environmental Protection Act, to closely review our list of concerns and honor the obligation of MEPA to mandate the requisite mitigation before approving the Notice of Project Change.

Sincerely,

Beals Associates, Inc.



Lawrence M. Beals, Principal

cc: Paul Salvage, Courthouse Park Associates
Paul Rothschild, Courthouse Park Associates
Jeffery Roberts, Esq.

Figure 1



Adapted from MGM Springfield DEIR Figure 3-2, prepared by Epsilon Associates, Inc.

ALSO ADMITTED IN
NEW YORK AND
MASSACHUSETTS

LAW OFFICES OF
ERIC I. MICHELMAN
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November 9, 2015

VIA E-MAIL (holly.s.johnson@massmail.state.ma.us)

Secretary Matthew A. Beaton
Executive Office of Energy & Environmental Affairs
Attn: Holly Johnson, MEPA Office
100 Cambridge St., Suite 900
Boston, MA 02114

Re: Comments To Notice of Project Change ("NPC"), MGM Springfield, EEA #15033

Dear Secretary Beaton:

The undersigned hereby submits the following comments to the NPC of Blue Tarp Redevelopment, LLC (the "Proponent") on behalf of the owners of Parcel #14 as designated and depicted in Exhibit "H" to the Host Community Agreement, by and among the City of Springfield, the Proponent and MGM Springfield Redevelopment LLC dated May 14, 2013.

Parcel #14 is located in Springfield, Massachusetts, on East Columbus Avenue between Howard St. and Bliss St. (The common address is 1317-1343 East Columbus Ave. and 90 Howard Street). The north end of Parcel #14 is only a few feet from the Proponent's newly proposed roadway connecting East Columbus Avenue and the Bliss Street entrance to the Project Site and the proposed 3,375 space parking structure.

Parcel #14 contains a building with uses including both residential dwellings and commercial offices. As represented in the Host Community Agreement, the Proponent contracted to purchase Parcel #14 presumably to fulfill the Proponent's obligation to mitigate the traffic hazard at the main ingress point to the Project at East Columbus Avenue and Bliss St. (as set forth in the HCA, and described in the Proponent's RFA-2 Gaming Application, and it

Draft Environmental Impact Report (the "DEIR")). The Proponent did not consummate its agreement to purchase Parcel #14.

Preliminarily, it should be noted that the owners of Parcel #14 did not submit comments to the DEIR because at that time they were under contract to sell Parcel #14 to the Proponent. However, on behalf of the owners of Parcel #14, the undersigned submitted comments to the Proponent's Final Environmental Impact Report ("FEIR"), but the Proponent failed to include the undersigned in its Circulation List (See NPC Attachment 1, p.50; and see NPC Attachment 5). As such, the Proponent has failed to comply with 301 CMR 11.10(7).¹

The NPC is deficient, vague and misleading in a number of respects, including but not limited to the following:

1. The Proponents states the proposed changes are "minor" (p.1, p.2). This statement is an incorrect conclusion and misleading.
2. The Proponent states that "the changes do not create any new environmental impacts...". (p.1). This statement is an incorrect conclusion and misleading.
3. The Proponent states that it is "committed to complete the mitigation measures previously proposed in the Draft and Final EIR's" (p.1.). This statement is misleading because the changes proposed create new environmental impacts which require new mitigation obligations.
4. The Proponent states in Footnote 1 (p.1) that the proposed design changes must only be approved by the Massachusetts Gaming Commission and the City of Springfield. This statement is misleading. Springfield Zoning Ordinance Section 8.5.80 requires amendments to site plans and elevations specified in the Host Community Agreement (which were deemed pre-approved by virtue of Springfield Zoning Ordinance Section 8.5.33) must be approved "pursuant to the same procedure and subject to the same limitations and requirements by which said plans and proposals were initially approved." The original site plans and elevations were approved by the voters of the City of Springfield in a city-wide referendum on July

¹ It should also be noted that the Proponent also failed to include Springfield Mayor Dominic J. Sarno on the Circulation List.

16, 2013 (the ballot sought “approval for the City of Springfield to Host the MGM Springfield Casino *pursuant to the terms of the signed Host Community Agreement*”). Therefore, any material design changes must be approved by the voters of City of Springfield.

5. The Proponents states under “Description of Project Changes – Reduction parking garage size”: “The parking garage has been reduced by one level to a seven story parking garage. This results in a reduction of 387 parking spaces.” This statement is materially misleading. The statement fails to disclose the elimination from the parking structure of all arrivals, departures and parking for buses. It also fails to disclose that a new element of bus vehicular traffic will be introduced on to the one-way, northbound, un-widened, East Columbus Avenue traveling past Parcel #14 and making a turn into the Project Site on the property immediately adjacent to Parcel #14. This bus traffic will be to both drop off and pick up passengers at the newly proposed “bus depot” to be located at the newly termed “South-end Market” (i.e. the location of the porte-cochere servicing the 25 story glass hotel as originally proposed). (See NPC p.7 - Truck and Bus Access/Egress).

Buses dropping off passengers will then egress the Project Site presumably on State Street requiring the buses to travel throughout the City streets in search for parking at undisclosed off-site locations, only to later return to the “bus depot” a second time via the sole route of East Columbus Avenue for the purpose of picking up passengers.

In addition, the NPC proposes only three bus drop-off sites (i.e. the “sawtooth” bays). There is no information regarding any volumes of bus arrivals for drop-offs and pick-ups. To the extent that the three “sawtooth” lanes are inadequate, then buses will either be idling on Bliss St. or circling the City streets. In either event, there will be environmental impacts from traffic, noise, vibration and exhaust fumes.

There is absolutely no mention in the NPC of the scope or breadth of the impact from the buses, or any related mitigation whatsoever. Please note that the TEC Traffic Study incorporated into the Host Community Agreement and included in the Proponent’s RFA-2 Gaming Application (as referenced in Attachment 4-24-01) made

the material representation that East Columbus Avenue would be widened between Howard St. and Bliss St. to mitigate traffic volumes and provide for a deceleration lane for MGM Springfield traffic entering at Bliss St (to access the sole entrance to the then 3,762 spaces in the Parking Structure). At the time the representations were made to widen East Columbus Avenue, there was no plan for a “bus depot” on Bliss Street. With the introduction of unquantified double daily trips for each bus, and the purposeful failure to provide any data, or mitigation related to such bus trips (each of which will pass next to, and under, Parcel #14 and its residences), the Proponent has failed, arguably intentionally, to introduce such impact, or any proposed mitigation measure to such impact. This bus impact is clearly contrary to the Proponents statements that “the changes do not create any new environmental impacts...”(See Paragraph 2 above). Under the old design, buses were to enter and exit the parking structure on Union St. Project related bus travel on East Columbus Avenue was limited to egressing buses heading northbound on I-91.

6. Attachment 3 (the “Currently Proposed Site Plan”) is NOT TO SCALE, and is grossly misleading with respect to the location of Parcel #14. Attachment 3 depicts Parcel #14 to be further away from the Bliss St. than actual. This is clearly an attempt by the Proponent to mislead the Commonwealth and the City as to the proximity to Parcel #14 of the newly proposed curve onto to Bliss St. which will be used by all vehicles, including the double trips by all buses not disclosed by the Proponent in the NPC. This combination of a failure to disclose the bus traffic, and to incorrectly diagram the location of Parcel #14 demonstrates that the Proponent’s disclosures are not in good faith, and lack honesty and integrity.
7. The Proponent states in Footnote 2 that the construction of the residential units will not require any further State action by the Commission. This is an invalid conclusion of law. The Massachusetts Gaming Commission has the authority and responsibility to approve all design changes.
8. The Proponent states that it is implementing a comprehensive program of measures to mitigate traffic impacts. (NPC, p.6). In light of the comments set forth above, this statement is false.

9. The Proponents states “The proposed changes will not result in changes in transportation impacts”. (NPC, p. 6 – Transportation). In light of the comments set forth above, this statement is false.

10. Table 2 – “Trip Generation Comparison” fails to reflect the introduction of the new double bus trips to access the Project Site for drop-off, and return trips for pick-up, (as discussed above), and as such, is insufficient and misleading.

11. The Proponent’s statement on page 7 of the NPC with respect to residential parking that “There is also sufficient parking supply on the MGM Springfield site to provide alternative arrangements for parking.” is inconsistent with the newly reduced number of parking spaces in the parking garage, and is misleading. First, the parking structure capacity before the proposed change was 3,762 (NPC p. 2.). The reduction in parking spaces is 352 (NPC p. 3). The NPC lacks specificity whether the reduction relates to buses or automobiles. Second, the reduced number of parking spaces is proposed to be 3,375. Projected peak demand (assuming the number provided is trustworthy) is 3,127 (NPC Table 3). Thus, there is a projected excess capacity of only 248 parking spaces spread throughout the proposed seven story parking structure (each floor to cover approximately two to three football fields). Third, the Proponent’s statement that “drivers typically perceive a “parking lot” to be full when approximately 90% of the park spaces are full.” (NPC p. 13). This statement may be misleading as there is a distinction between a “parking structure” and a “parking lot”. As such, contrary to Proponent’s statement at NPC p. 13, there is little doubt that the consequence of the proposed design changes will result in “excess recirculation of vehicles to find open parking spaces”, and insufficient parking at any given time.

12. The Proponent makes the conclusory statement that the design changes will result in “...minor traffic distribution changes associated with these modifications on traffic volumes along Bliss Street, Howard Street and Union Street...” (NPC p.7), but omits to describe the substantial traffic distribution changes on East Columbus Avenue between Howard Street and Bliss Street and at Parcel #14, due to the “shift” of the bus drop off area from the Union St. parking structure entrance to the Bliss St. (MGM Way) bus depot at the “South-end Market”.

13. The Proponent is making a zero margin bet that no more than two trucks (presumably tractor trailers, box trucks, sanitation trucks, and other supply vehicles for the entire Casino Block and Retail Block) will be entering the site at the same time. If the Proponent is incorrect, it does not provide any basis for mitigation of truck traffic waiting to enter the reduced sized, shipping and receiving dock in the of the ground floor of the parking structure at Union Street. (NOTE: the previous design included an underground level of the parking structure for shipping and receiving). This lack of capacity for waiting trucks will greatly impact the environment and traffic, and could impede egressing traffic from the parking structure's proposed second floor exit ramp which empties onto Union Street at the location of the left hand turn lane into the parking structure's truck entrance. (NOTE: the NPC states the truck driveway on Union Street is proposed to be shifted approximately 65 feet closer to East Columbus Avenue).
14. The NPC at p.3 states "the parking garage has been reduced by one level to a seven-story parking garage" fails to disclose the elimination of the underground level of the Parking Structure. As such, the proposed changes include the elimination of at least two levels to the Parking Structure. The elimination of the basement level (as disclosed on NPC p.9) creates substantial environmental impacts due to the relocation and rerouting of buses, passenger vans, limousines, and truck staging on Union Street.
15. The proposed Passenger Van Parking and Limousine Staging has been shifted to immediately behind Parcel #14 and its five (5) residential apartments. The area proposed for this staging of livery vehicles was previously used as a church rectory. In light of the fact that Springfield Zoning Ordinance Section 8.5.10 provides that the Proponent is obligated to contribute positively to the built environment and ensure a high quality of life for nearby businesses and residents, and the fact that the Proponent promised the City, and the City voters, and the Commonwealth and the Mass. Gaming Commission, and the owners of Parcel #14 that the Proponent would widen East Columbus Avenue at Parcel #14, the proposed redesign is punitive, unlawful and without integrity. The impact of air and noise pollution immediately adjacent to the residences is anticipated to be 24 hours a day, 7 days per week, and

- is unacceptable. The Proponent makes to mention whatsoever of any mitigation for this impact. Staging of livery vehicles next to residences creates an unsustainable impact to the built environment. The only mitigation is to eliminate this proposed use at the site abutting Parcel #14.
16. The only entrance to the proposed parking structure containing 3,375 parking spaces (claimed to be filled to approximately 89% capacity) is on Bliss Street, 200 feet from East Columbus Avenue. The proposed redesign of the location of the entrance eliminates traffic to flow freely into the garage from either direction on Bliss Street. (NPC, p. 9). As such, all traffic entering the parking structure will be sourced from the one-way, northbound, East Columbus Avenue which will be required and directed to turn onto Bliss Street at the northern border of Parcel #14. The Proponent fails to disclose the exact distance between the northern border of Parcel #14 and the proposed new access roadway connecting East Columbus Avenue and Bliss St. But, as disclosed above, the "Currently Proposed Site Plan" which is Attachment 3 to the NPC, is not to scale and deceptively overstates the distance between Parcel #14 and the proposed roadway connecting East Columbus Avenue and Bliss St.
 17. Attachment #3 depicts a staircase/stairwell in the Parking Structure at the location of Howard St. and the central plant. It is not clear whether there is a pedestrian access door from such staircase/stairwell at the ground level to Howard Street. It is also not clear if there is a pedestrian sidewalk for access to such staircase/stairwell. Such access door and sidewalk is imperative for public safety. Also, to mitigate impacts to the handicapped and seniors, an elevator should be installed at the location of the staircase/stairwell at this location, as the only other elevator appears to be more than a football field away.
 18. No mitigation plan is disclosed to eliminate the impact on Parcel #14 with respect to road closures of Bliss Street and Howard Street, the elimination of street parking at those locations, and the elimination of emergency access and public service access to Parcel #14, including sanitation, fire and rescue, mail, and public utilities. The health, safety and welfare of the occupants, residents, guests, patrons, vendors, and

Secretary Matthew A. Beaton
Executive Office of Energy & Environmental Affairs
Attn: Holly Johnson, MEPA Office
November 9, 2015
Page 8

service personnel are at an extreme risk based upon the proposed changes in the NPC.

In closing, notwithstanding the violations and breaches committed by the Proponent with respect to its voter approved Host Community Agreement, and its Gaming License, the proposed redesign changes severely and substantially impact and burden Parcel #14 without mitigation. The NPC is wholly inadequate and the Proponent must be required to provide specific mitigation measures including a different redesign of the Project.

Respectfully submitted,

/s/ Eric I. Michelman

Eric I. Michelman

cc: Edward M. Pikula, Esq. (epikula@springfieldcityhall.com);
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BEALS · ASSOCIATES INC.

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PHONE: 617-242-1120

November 9, 2015

Secretary Matthew A. Beaton
Executive Office of Energy & Environmental Affairs
MEPA Office
Attn: Holly Johnson
100 Cambridge Street, Suite 900
Boston, MA 02114

Submitted via email and hand delivery on November 9, 2015

**Subject: Red Rose Pizzeria
Notice of Project Change
MGM Springfield, EEA #15033**

Dear Secretary Beaton:

We are writing on behalf of Red Rose Pizzeria in regard to the Springfield, Massachusetts MGM Casino Notice of Project Change EEA Number 15033. Over the past two years, we have reviewed and commented on both the DEIR prepared by Epsilon Associates dated December 16, 2013 and the FEIR prepared by Epsilon Associates dated November 6, 2014. We have met directly with Blue Tarp Redevelopment – the development arm of MGM – several times. We have provided testimony to the Massachusetts Gaming Commission, and the Commission’s General Counsel responded in a letter to us that “the Commission believes many of the issues raised can be dealt with more efficiently and more appropriately during the MEPA process and the license and permitting processes that will follow.” Now we have reached that point in the process and yet development proceeds without the majority of our concerns addressed. To date, Blue Tarp Redevelopment has received eight Building Permits and sixty-two permits from the Springfield Department of Public Works. Buildings have been demolished and utilities have been installed underground, and yet there have been no substantial mitigation conversations with abutters. Since the local permitting process is inadequately addressing our concerns, we ask that MEPA fulfill its obligation to mandate mitigation for outstanding issues before approving this Notice of Project Change.

The Red Rose Pizzeria property is located at the corner of Howard Street and Main Street with an active curb cut on Howard Street. The proposed MGM Development surrounds the subject property to the west, south, and east. The site features Italian style restaurant, Red Rose Pizzeria, as well as the Caring Health Center. Sole access to the building’s parking, pick up drop off, and delivery services are through the Howard Street access point. The MGM Casino plan, as represented in the Notice of Project Change discontinues Howard Street and greatly impacts access to the Red Rose property.

Listed below is a summary of outstanding concerns from the FEIR that Blue Tarp Redevelopment has still not adequately addressed. We request that each concern be thoroughly reviewed and resolved prior to the approval of this Notice of Project Change. Most of these issues are not new issues and they are issues that we have previously brought to the attention of MGM, the Massachusetts Gaming Commission, MEPA, and MGM’s design consultants.

Site:

1. The main entrance to the Casino is still proposed to be on the corner of Main Street and Howard Street. Red Rose Pizzeria remains extremely concerned about the volume of traffic down Howard Street because of the entrance location. Howard Street is not designed to handle significant traffic so access to and egress from abutting businesses will be adversely impacted.
2. Moreover, for over 50 years customers of the Red Rose Pizzeria have accessed the property from Howard Street. Discontinuing Howard Street, by MGM, will dramatically alter and diminish access to the property thereby disrupting the long-term customer base which is so important to successful operation of the business. In exchange for the discontinuance of the public way, Howard Street, on which the Red Rose Pizzeria is dependent, we believe that the Proponent should provide an alternative but comparable means of access to the property.
3. The Proponent responded, "Every two weeks, the contractor will publish an updated schedule of upcoming work and will disseminate the schedule to affected parties in local neighborhoods." We insist that as direct abutters, the contractors provide schedules to Red Rose Pizzeria regularly.

Transportation:

1. The subject property should be provided with clean and clear pedestrian and vehicle access throughout construction along the south side of Main Street from Union Street to State Street to allow the existing businesses to remain open to lunch time patrons.
2. The addition of bicycle sharrows is inadequate for Main Street. Bicycle lanes should be incorporated into the street design for proper safety.
3. We insist the Proponent implements an effective Transportation Monitoring Program to minimize impacts on surrounding businesses throughout the construction process.

Water Supply:

1. A comprehensive water service model is still needed for the entire area to assess impacts and mitigation for both domestic supply and fire protection. This should be completed as part of a supplemental FEIR.
2. Water service should not be interrupted during business hours. This is a matter of life safety as shutting off service would incapacitate the Fire Department in the event of a fire.

Wastewater:

1. Backflow preventers should be provided on sewer laterals of all building connecting to the existing discharge line to protect existing developments from the increased wastewater flow from the MGM Casino.

Stormwater:

1. There is mention in the FEIR that the project will implement Massachusetts Water Conservation Standards. We request a list of which standards will be implemented.

2. There is a statement by the Proponent about the inclusion of Low Impact Development strategies and stormwater BMPs to minimize the project's contributions into the CSO. We request further detail about which strategies and what BMPs will be used.
3. We also request the Proponent conducts an analysis of how these Low Impact Development and BMPs will perform on this project site with regards to water both stormwater quantity and quality since this information was missing in the FEIR.

We thank you for the opportunity to submit these comments for your consideration. We believe that the alterations provided in the Notice of Project Change require substantially more work and consideration before approval. As proposed, the development will have significant impacts on the Red Rose Pizza property and no substantial mitigation has yet to be proposed. We urge you, on behalf of the Massachusetts Environmental Protection Act, to closely review our list of concerns and honor the obligation of MEPA to mandate the requisite mitigation before approving the Notice of Project Change.

Sincerely,

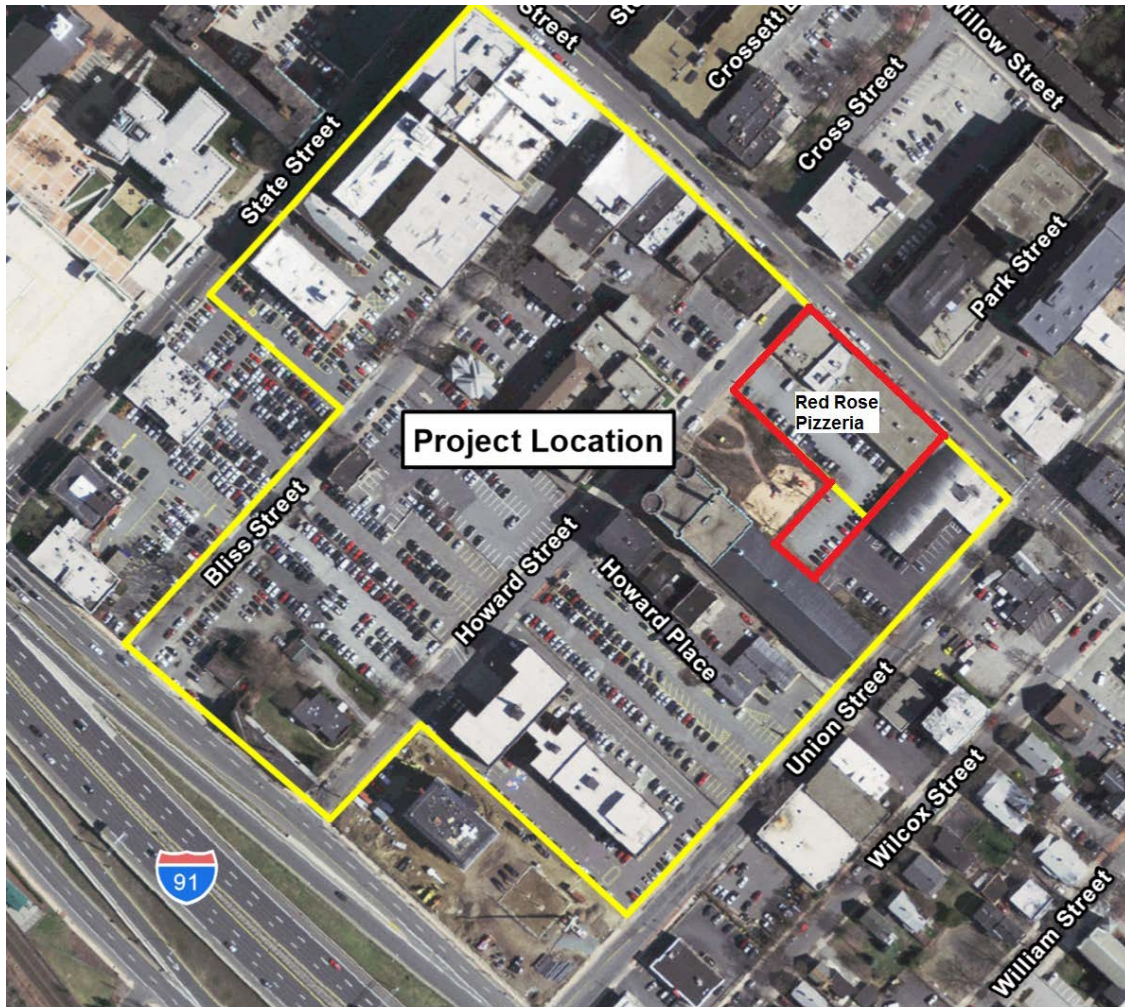
Beals Associates, Inc.



Lawrence M. Beals, Principal

cc: Carmela Fraziero, 1060 Main Street Irrevocable Trust
Jeffery Roberts, Esq.

Figure 1



Adapted from MGM Springfield DEIR Figure 3-2, prepared by Epsilon Associates, Inc.

Moked, Talya

From: Johnson, Holly S (ENV) <holly.s.johnson@state.ma.us>
Sent: Friday, November 20, 2015 10:21 AM
To: Briggs, Peggy
Subject: FW: Public Comment on MGM Springfield Notice of Project Change

Another letter.

Holly Johnson
Policy and Program Analyst, MEPA Office
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900 | Boston, MA 02114
☎: 617-626-1023 | 📠: 617-626-1181 | ✉ holly.s.johnson@state.ma.us

From: Ted Steger [<mailto:tsteger@gmail.com>]
Sent: Wednesday, November 18, 2015 8:17 PM
To: Johnson, Holly (EEA)
Subject: Fwd: Public Comment on MGM Springfield Notice of Project Change

Please see below - I apologize for the incorrect email address on the first submission.

Thanks,
Ted

----- Forwarded message -----

From: **Ted Steger** <tsteger@gmail.com>
Date: Wed, Nov 18, 2015 at 8:15 PM
Subject: Public Comment on MGM Springfield Notice of Project Change
To: "Snowdon, Corinne" <csnowdon@epsilonassociates.com>, "Buckley, Deirdre (ENV)" <deirdre.buckley@state.ma.us>, holly.johnson@state.ma.us

Submitted Electronically 8:15PM November 18th, 2015

To Whom It May Concern,

I'd like to submit the following comment for MGM Springfield's Notice of Project Change.

The summary of MGM Springfield's presentation at 4PM on November 18th in Springfield in local media reported the following:

(http://www.masslive.com/mgm_springfield/index.ssf/2015/11/mgm_springfield_says_casino_wi.html#incart_river_home)

"A 14 percent footprint reduction, first reported by the Republican, caught city officials off guard and led MGM top brass to issue apologies and hold closed-door meetings with Mayor Domenic Sarno and city councilors. MGM officials said at the time that the reductions were largely to back-of-house space, but included reductions to retail, dining and entertainment venues.

In today's presentation, the company said the reduction was actually 9.71 percent, largely focused on back-of-house space. The higher total was derived from the company's MEPA filing, which gave a high estimate of the reduction to ensure the company had room to maneuver with regulators, MGM officials said -- but the most recent site plans filed with the city show a smaller reduction.

"We give ourselves room to make sure we can design what we need and what we want," Hornbuckle said.

The hotel will see a 2.15 percent footprint reduction and bowling and entertainment a .52 percent drop, according to the presentation. The rest of the change is due to cuts in the loading area, kitchen space and other non-customer facing areas."

I'm concerned that this is an attempt to mislead or misinform MEPA, and/or the citizens of the Commonwealth, as the environmental impact is proportional to the size and number of visitors to the project. I'd ask that MGM provide accurate information as to the proposed size of the project so that MEPA can make an informed decision as to the environmental impact of the project.

Thank you for your time,
Ted Steger
35 Warwick St.
Longmeadow, Massachusetts

NOV 23 2015



Timothy W. Brennan, Executive Director

November 6, 2015

Matthew A. Beaton, Secretary
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, Massachusetts 02114

Attention: MEPA Unit

Reference: Review Comments on the Notice of Project Change for the Proposed MGM Springfield Development, EEA # 15033.

Dear Secretary Beaton:

The Pioneer Valley Planning Commission (PVPC) has the following review comments to offer on the Notice of Project Change (NPC) filed for the above-cited project. The proposed project is a multi-use development consisting of the recently licensed MGM casino as well as hotel, apartment, office and retail space located in downtown Springfield, Massachusetts. The NPC proposes to: relocate the proposed housing component of the project off-site; modify the height and configuration of the proposed hotel; reduce the number of on-site parking spaces by 387; reduce the number of gaming positions by 164; reduce the total size of proposed retail space by 26,800 square feet; and, add a 1,300 square foot arcade.

Intersection of Level of Service

The proposed project changes result in many modifications to the existing site plan, which in turn, will result in the redistribution of site traffic onto the local street system. We cannot agree with the project proponent that the proposed changes are wholly insignificant and do not require an update of the quantitative capacity analysis of intersections in the vicinity of the site. Information included in the NPC indicates that it is likely traffic will be redistributed internally and result in traffic that was previously expected to use Howard Street to now use Union Street and Bliss Street. This could be of critical importance, particularly on Union Street which can experience significant congestion at its intersection with East Columbus Drive. Given this, we'd request that additional information be provided on the anticipated changes to the trip distribution information filed as part of the FEIR. It is also recommended that new level of service analysis be performed for the study area intersections in the immediate vicinity of the project, including the Interstate I-91 on and off ramps.

Roadway Safety Audits

The project proponent has committed to conduct a number of roadway safety audits (RSAs) at a number of high crash locations in the study area. PVPC would like to commend the project proponent for continuing to advance these necessary RSAs. It is requested that the findings from all RSAs completed by the project proponent be included as part of any future filings for this project.

Parking

The proposed change is expected to result in the loss of 387 parking spaces. While the NPC includes an analysis of parking needs, it does not include information on plans for overflow parking that could be necessary as a result of special events. Accordingly, we urge that more information be provided on the potential impact of special events on parking both on-site and in the downtown Springfield area.

Off-site Bus Staging

The NPC indicates that the project proponent is currently investigating opportunities for off-site staging for buses. Additional information is requested on the proposed locations for such off-site bus staging as well as the estimated number of buses that may require staging during peak hours of operation.

Aesthetics

The proposed project changes will now result in the parking garage to be the largest component of the project in terms of both height and footprint. This could have a negative impact on the visual and physical separation of downtown Springfield from the riverfront area of the Connecticut River. While the NPC does include artist concepts of the proposed project, it is unclear what the true impact of the development will be on the riverfront area. Additional information is, therefore, requested on the design and aesthetics view of the parking garage structure, particularly looking from the Connecticut River.

Thank you for the opportunity to offer our comments on the NPC prepared for this proposed project.

Sincerely,


Timothy W. Brennan
Executive Director

- cc: S. Hanson, PVPC Alternate – Springfield
C. Cignoli, Director of Public Works - Springfield
L. Lucien – MassDOT Public/Private Development
R. Masse – MassDOT District 2 Highway Division
K. Dandrade – TEC
J. Ziemba - MGC

Thurlow, Mary (MGC)

From: Briggs, Peggy <pbriggs@epsilonassociates.com>
Sent: Monday, November 23, 2015 2:06 PM
To: Moked, Talya
Subject: FW: MGM Springfield response to public comments to NPC

Peggy Briggs

Epsilon Associates
978-461-6219

From: Stratton, Seth [<mailto:SStratton@mgmspringfield.com>]
Sent: Monday, November 09, 2015 4:46 PM
To: Briggs, Peggy
Cc: Nosal, Jed M.
Subject: MGM Springfield response to public comments to NPC

Dear Secretary Beaton:

MGM Springfield wishes to briefly address public comments filed by certain abutters (Briarwood Thirteen, Colvest, Court House, Red Rose Pizza) in connection with MGM Springfield's (Proponent) Notice of Project Change, EEA Number 15033, specifically to inform MEPA of the Proponent's ongoing effort to address concerns of abutters in connection with the project. As indicated in its Notice of Project Change, MGM Springfield remains committed to the mitigation set forth in connection with its FEIR.

MGM Springfield representatives met with abutters, including commenters Briarwood Thirteen, Colvest, Court House, Red Rose Pizza or their representatives, on July 23, 2015, August 17, 2015 and, most recently on November 5, 2015, to specifically discuss abutter concerns and MGM Springfield's mitigation measures. Many of the concerns raised in the comments filed by these abutters were discussed and a list of follow-up items was developed. MGM Springfield will continue to meet with its abutters to address these concerns and provide other information regarding the projects through its biweekly abutter updates and further in-person meetings, as well as through various local approval processes.

Thank you for your attention to this matter and MGM Springfield's pending Notice of Project Change.

Sincerely,

Seth N. Stratton

Vice President & General Counsel

MGM SPRINGFIELD

Monarch Place, Suite 910

Springfield, MA 01144

413.273.5333

email: sstratton@mgmspringfield.com



MGM RESORTS
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The information contained in this message and any attachments are intended for the exclusive use of the addressee(s) and may contain confidential or privileged information. If you are not the intended recipient, please notify me and destroy all copies of this message and any attachments.



65 Glenn Street | 169 Ocean Blvd.
Lawrence, MA 01843 | PO Box 249
Hampton, NH 03842
T: 978.794.1792 | T: 603.601.8154
TheEngineeringCorp.com

Matthew A. Beaton, Secretary
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114

November 9, 2015

Attention: MEPA Analyst

RE: Notice of Project Change for Proposed MGM Springfield Development (EEA #15033)

Dear Secretary Beaton:

TEC received a letter from Timothy Brennan of the Pioneer Valley Planning Commission (PVPC) dated November 6, 2015 summarizing review comments related to the Notice of Project Change (NPC) submitted to the Massachusetts Environmental Policy Act (MEPA) office in regards to the proposed MGM Springfield Development (EEA #15033). Within this comment letter, PVPC requested that updated quantitative capacity analysis be performed of the intersections within the vicinity of the project site to ensure that the proposed site plan modifications described in the NPC would not negatively impact the operations of intersections surrounding the site. As part of the site plan submission to the City of Springfield, TEC prepared updated traffic-volume networks comparing traffic volumes at the study area intersection immediately surrounding the site. In addition, TEC performed a sensitivity analysis to evaluate the traffic operations of the following intersections around the site that would experience increases or significant modifications in traffic volumes as a result of the site plan changes:

- East Columbus Avenue / Union Street / I-91 Northbound On-Ramp
- West Columbus Avenue / Union Street / West Union Street
- East Columbus Avenue / Howard Street
- East Columbus Avenue / Bliss Street

The detailed traffic volume networks and capacity analysis worksheets are included as an Attachment to this letter and the results of the capacity and queue analysis are summarized in Table 1 below.

The results of the analysis indicate that the proposed site plan modifications will result in negligible changes in delays and queues through the study area intersections described above. The remaining intersections within the study area will experience decreases in site-generated traffic volumes as a result of the site plan modifications. Therefore, the results of the capacity and queue analysis contained in the Draft and Final Environmental Impact Reports (EIRs) for the project represent a conservative (worse case) analysis condition and the operations of these intersections will improve with the modifications to the site plan as compared to the plan contained in the FEIR. As a result, no additional analysis is warranted at these intersections.

Table 1 – Traffic Operations Comparison

Intersection / Lane Group	2024 Build with Mitigation (From DEIR)				2024 Build with Mitigation (Current Site Plan)			
	V/C	Delay	LOS	Queue	V/C	Delay	LOS	Queue
East Columbus Avenue / Bliss Street								
<i>Friday Evening</i>								
Bliss Street WB approach	0.56	19.0	C	86	0.69	24.7	C	135
<i>Saturday Evening</i>								
Bliss Street WB approach	0.17	12.0	B	<25	0.24	11.6	B	<25
East Columbus Avenue / Union Street / I-91 Northbound On-Ramp								
<i>Friday Evening</i>								
Union Street EB HL/LT	0.25	7.6	A	45/47	0.24	7.7	A	46/47
Union Street EB TH	0.55	11.6	B	169/175	0.55	11.7	B	177/181
Union Street WB TH	0.60	40.4	D	125/203	0.60	40.4	D	126/205
Union Street WB RT/HR	0.49	38.1	D	62/157	0.47	37.8	D	59/152
East Columbus Avenue NB HL/LT	0.75	31.0	C	261/399	0.75	31.1	C	261/399
East Columbus Avenue NB TH/RT	0.72	30.3	C	256/393	0.72	30.2	C	253/386
Overall Intersection	0.73	28.0	C	-	0.73	28.0	C	-
<i>Saturday Midday</i>								
Union Street EB HL/LT	0.30	24.7	C	40/76	0.29	23.8	C	38/74
Union Street EB TH	0.50	27.1	C	73/136	0.49	26.2	C	70/133
Union Street WB TH	0.48	39.3	D	90/149	0.49	39.4	D	92/151
Union Street WB RT/HR	0.23	37.0	D	18/83	0.21	36.8	D	15/79
East Columbus Avenue NB HL/LT	0.59	26.7	C	114/169	0.59	26.9	C	114/169
East Columbus Avenue NB TH/RT	0.52	25.9	C	101/188	0.51	25.9	C	98/184
Overall Intersection	0.54	28.2	C	-	0.54	28.1	C	-
West Columbus Avenue / Union Street / West Union Street								
<i>Friday Evening</i>								
West Union Street EB TH/RT	0.26	41.6	D	35/43	0.26	41.6	D	35/43
Union Street WB LT	0.31	16.8	B	38/73	0.31	16.7	B	38/73
Union Street WB LT/TH	0.31	16.8	B	38/73	0.31	16.7	B	38/73
West Columbus Avenue SB LT	0.80	32.9	C	334/525	0.78	31.8	C	323/501
West Columbus Avenue SB	0.79	27.2	C	369/369	0.79	27.0	C	366/366
Overall Intersection	0.61	27.3	C	-	0.60	26.8	C	-
<i>Saturday Midday</i>								
West Union Street EB TH/RT	0.16	40.9	D	<25/44	0.16	40.9	D	<25/44
Union Street WB LT	0.28	16.7	B	37/75	0.28	16.5	B	37/75
Union Street WB LT/TH	0.28	16.7	B	37/75	0.28	16.5	B	37/75
West Columbus Avenue SB LT	0.35	17.4	B	103/143	0.34	17.2	B	100/137
West Columbus Avenue SB	0.34	16.0	B	98/98	0.33	15.6	B	94/94
Overall Intersection	0.34	17.3	B	-	0.33	16.9	B	-

Please do not hesitate to contact me with any follow-up questions or concerns. Thank you for your consideration.

Sincerely,
 TEC, Inc.



Kevin R. Dandrade, P.E., PTOE
 Principal

cc by email:
 Timothy Brennan (tbrennan@pvpc.org)
 Gary Roux (groux@pvpc.org)
 Holly Johnson (holly.s.johnson@state.ma.us)



North
Not to Scale

MGM Springfield Parking Garage Reconfiguration - Springfield, Massachusetts

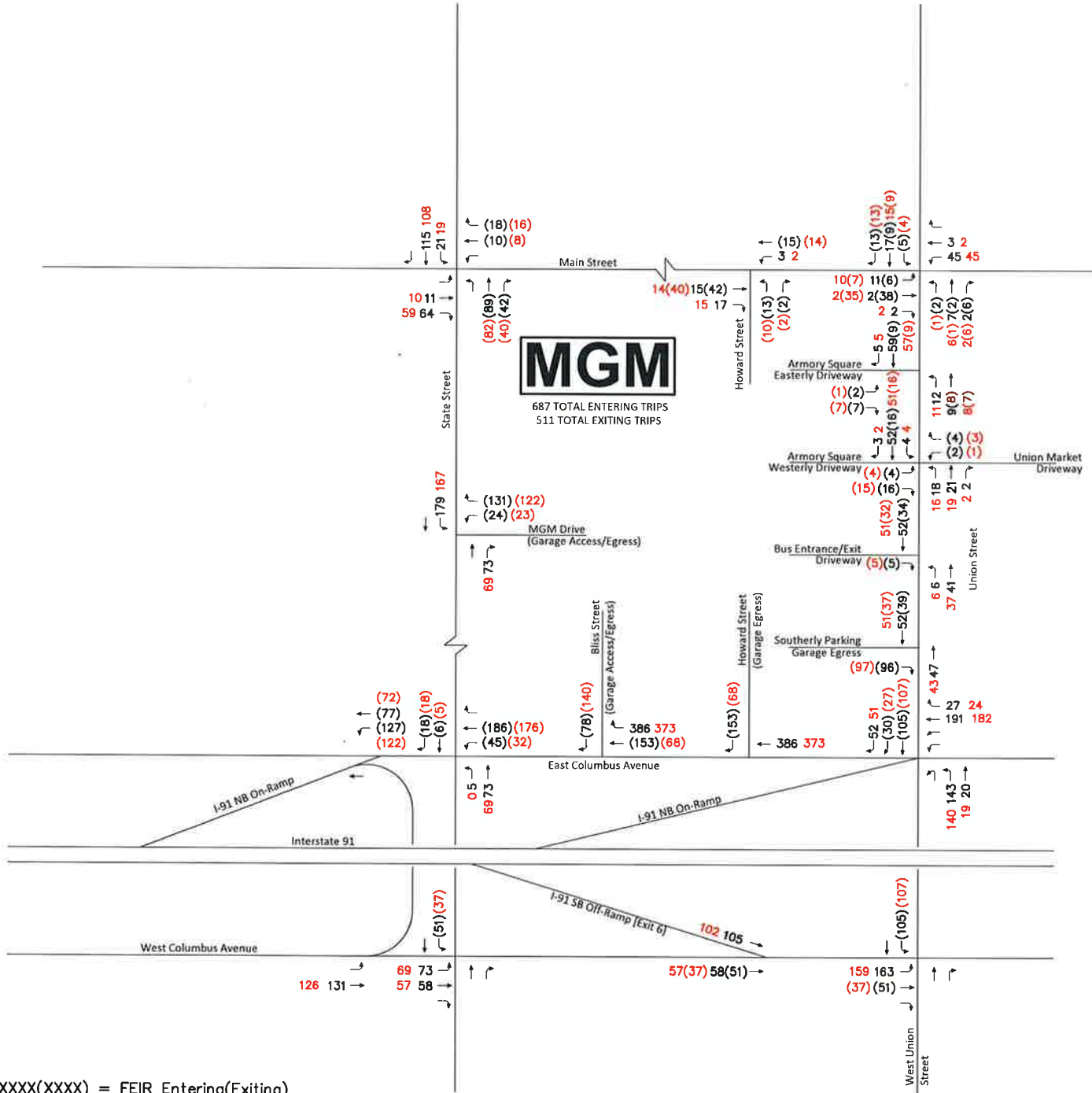
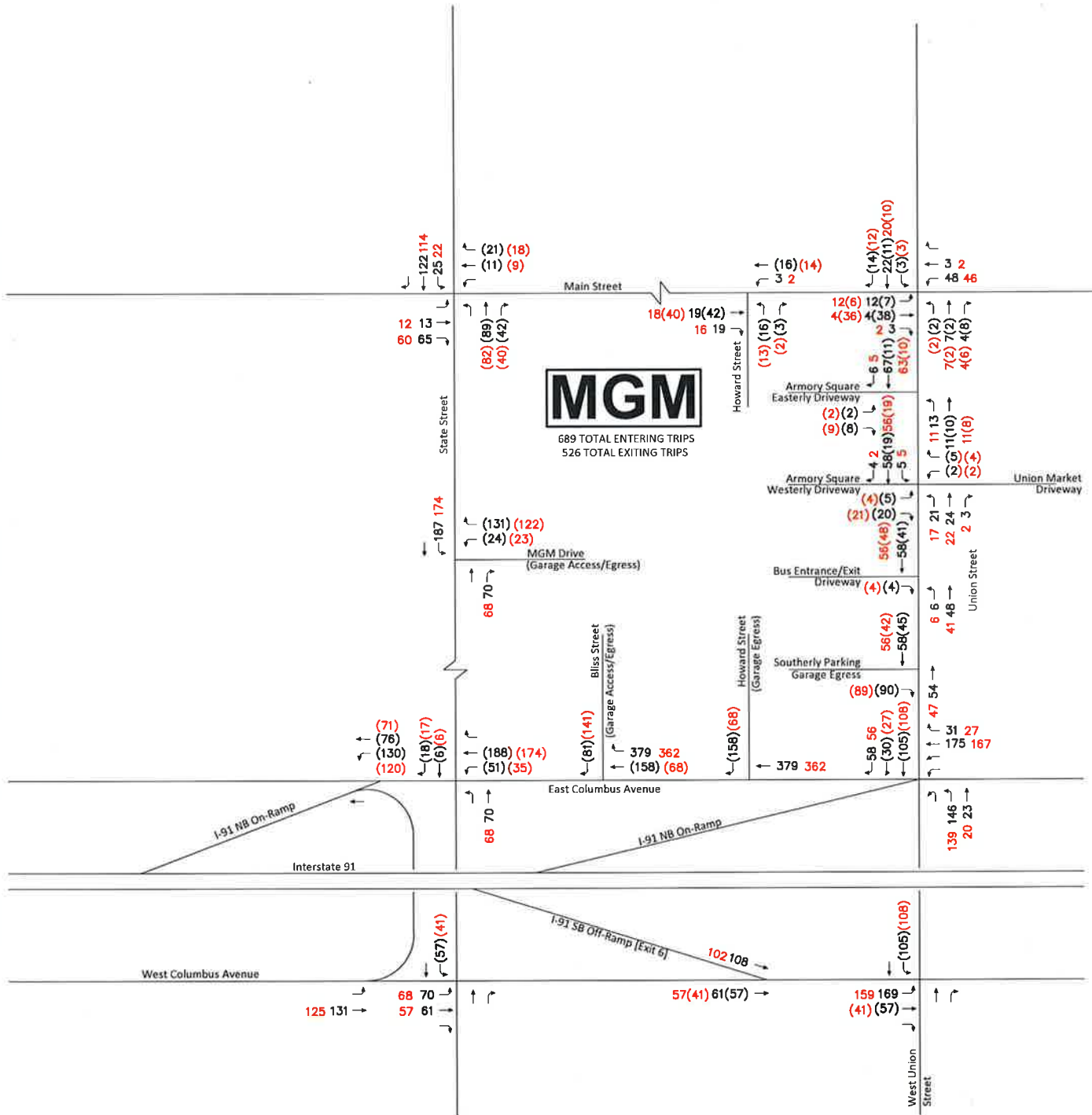


Figure 3

Net Site Generated Networks
Weekday Evening
Peak Hour Traffic Volumes



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(978) 794.1792 | (603) 601.8154
www.TheEngineeringCorp.com



XXXX(XXXX) = FEIR Entering(Exiting)
 XXXX(XXXX) = Proposed Site Plan Entering(Exiting)

Figure 4











Net Site Generated Networks
 Saturday Midday
 Peak Hour Traffic Volumes



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 65 Glenn Street | 169 Ocean Blvd, Unit 101
 Lawrence, MA 01843 | Hampton, NH 03842
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Lanes, Volumes, Timings
 16: East Columbus Avenue & Bliss Street

2024 Build with Mitigation Conditions
 Saturday MIDDAY











						
Lane Group	WBL	WBR	NBT	NBR	SBL	SBT
Lane Configurations			 			
Volume (vph)	0	160	454	383	0	0
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900
Lane Width (ft)	15	15	12	12	12	12
Lane Util. Factor	1.00	1.00	0.95	1.00	1.00	1.00
Ped Bike Factor						
Frt		0.865		0.850		
FIt Protected						
Satd. Flow (prot)	0	1772	3610	1583	0	0
FIt Permitted						
Satd. Flow (perm)	0	1772	3610	1583	0	0
Link Speed (mph)	30		35			35
Link Distance (ft)	128		266			296
Travel Time (s)	2.9		5.2			5.8
Confl. Peds. (#/hr)		10		10		
Peak Hour Factor	0.92	0.92	0.92	0.92	0.92	0.92
Heavy Vehicles (%)	0%	2%	0%	2%	0%	0%
Shared Lane Traffic (%)						
Sign Control	Stop		Free			Free

Intersection Summary

Area Type: Other
 Control Type: Unsignalized

HCM Unsignalized Intersection Capacity Analysis
 16: East Columbus Avenue & Bliss Street

2024 Build with Mitigation Conditions
 Saturday MIDDAY


















						
Movement	WBL	WBR	NBT	NBR	SBL	SBT
Lane Configurations			 			
Volume (veh/h)	0	160	454	383	0	0
Sign Control	Stop		Free			Free
Grade	0%		0%			0%
Peak Hour Factor	0.92	0.92	0.92	0.92	0.92	0.92
Hourly flow rate (vph)	0	174	493	416	0	0
Pedestrians	10					10
Lane Width (ft)	15.0					0.0
Walking Speed (ft/s)	3.5					3.5
Percent Blockage	1					0
Right turn flare (veh)						
Median type			None			None
Median storage (veh)						
Upstream signal (ft)			697			296
pX, platoon unblocked						
vC, conflicting volume	503	267			920	
vC1, stage 1 conf vol						
vC2, stage 2 conf vol						
vCu, unblocked vol	503	267			920	
tC, single (s)	6.8	6.9			4.1	
tC, 2 stage (s)						
tF (s)	3.5	3.3			2.2	
p0 queue free %	100	76			100	
cM capacity (veh/h)	497	723			741	
Direction, Lane #	WB 1	NB 1	NB 2	NB 3		
Volume Total	174	247	247	416		
Volume Left	0	0	0	0		
Volume Right	174	0	0	416		
cSH	723	1700	1700	1700		
Volume to Capacity	0.24	0.15	0.15	0.24		
Queue Length 95th (ft)	23	0	0	0		
Control Delay (s)	11.6	0.0	0.0	0.0		
Lane LOS	B					
Approach Delay (s)	11.6	0.0				
Approach LOS	B					
Intersection Summary						
Average Delay			1.9			
Intersection Capacity Utilization			31.1%		ICU Level of Service	A
Analysis Period (min)			15			

Lanes, Volumes, Timings

2024 Build with Mitigation Conditions

24: East Columbus Avenue & Union Street & Interstate 91 NB On-Ramp

Saturday Midday

											ø1	ø2
Lane Group	EBL2	EBL	EBT	WBT	WBR	WBR2	NBL2	NBL	NBT	NBR		
Lane Configurations												
Volume (vph)	35	180	195	146	109	90	113	556	494	98		
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900		
Lane Width (ft)	11	11	11	13	13	13	12	12	12	12		
Storage Length (ft)		0			0			180		0		
Storage Lanes		2			1			1		0		
Taper Length (ft)		25						25				
Lane Util. Factor	1.00	0.97	1.00	1.00	1.00	1.00	0.95	0.97	0.95	0.95		
Ped Bike Factor									0.99			
Frnt					0.850				0.975			
Flt Protected		0.950						0.950				
Satd. Flow (prot)	0	3385	1837	1963	1669	0	0	3467	3439	0		
Flt Permitted		0.950						0.950				
Satd. Flow (perm)	0	3385	1837	1963	1669	0	0	3467	3439	0		
Right Turn on Red						Yes				Yes		
Satd. Flow (RTOR)					185				24			
Link Speed (mph)			30	30					35			
Link Distance (ft)			215	239					718			
Travel Time (s)			4.9	5.4					14.0			
Confl. Peds. (#/hr)										4		
Peak Hour Factor	0.93	0.93	0.93	0.94	0.94	0.94	0.92	0.92	0.92	0.92		
Heavy Vehicles (%)	0%	0%	0%	0%	0%	0%	1%	1%	0%	10%		
Shared Lane Traffic (%)												
Turn Type	Split	Split	NA	NA	Perm		Split	Split	NA			
Protected Phases	2 3	2 3	2 3	4			1 5	1 5	1 5		1	2
Permitted Phases					4							
Detector Phase	2 3	2 3	2 3	4	4		1 5	1 5	1 5			
Switch Phase												
Minimum Initial (s)				15.0	15.0						15.0	6.0
Minimum Split (s)				20.0	20.0						20.0	11.0
Total Split (s)				23.0	23.0						33.0	17.0
Total Split (%)				23.0%	23.0%						33%	17%
Maximum Green (s)				18.0	18.0						28.0	12.0
Yellow Time (s)				4.0	4.0						4.0	4.0
All-Red Time (s)				1.0	1.0						1.0	1.0
Lost Time Adjust (s)				0.0	0.0							
Total Lost Time (s)				5.0	5.0							
Lead/Lag				Lag	Lag						Lag	Lead
Lead-Lag Optimize?				Yes	Yes						Yes	Yes
Vehicle Extension (s)				3.0	3.0						3.0	3.0
Recall Mode				Min	Min						C-Min	Min
Walk Time (s)											5.0	
Flash Dont Walk (s)											5.0	
Pedestrian Calls (#/hr)											10	

Intersection Summary

Area Type: Other
 Cycle Length: 100
 Actuated Cycle Length: 100

Lane Group	ø3	ø5
Lane Configurations		
Volume (vph)		
Ideal Flow (vphpl)		
Lane Width (ft)		
Storage Length (ft)		
Storage Lanes		
Taper Length (ft)		
Lane Util. Factor		
Ped Bike Factor		
Frt		
Flt Protected		
Satd. Flow (prot)		
Flt Permitted		
Satd. Flow (perm)		
Right Turn on Red		
Satd. Flow (RTOR)		
Link Speed (mph)		
Link Distance (ft)		
Travel Time (s)		
Confl. Peds. (#/hr)		
Peak Hour Factor		
Heavy Vehicles (%)		
Shared Lane Traffic (%)		
Turn Type		
Protected Phases	3	5
Permitted Phases		
Detector Phase		
Switch Phase		
Minimum Initial (s)	6.0	4.0
Minimum Split (s)	18.0	9.0
Total Split (s)	18.0	9.0
Total Split (%)	18%	9%
Maximum Green (s)	13.0	4.0
Yellow Time (s)	4.0	4.0
All-Red Time (s)	1.0	1.0
Lost Time Adjust (s)		
Total Lost Time (s)		
Lead/Lag	Lead	
Lead-Lag Optimize?	Yes	
Vehicle Extension (s)	3.0	3.0
Recall Mode	Min	Min
Walk Time (s)	5.0	
Flash Dont Walk (s)	8.0	
Pedestrian Calls (#/hr)	10	
Intersection Summary		

Lanes, Volumes, Timings

2024 Build with Mitigation Conditions

24: East Columbus Avenue & Union Street & Interstate 91 NB On-Ramp

Saturday Midday

Offset: 70 (70%), Referenced to phase 1:NBTL, Start of Green

Natural Cycle: 80







Control Type: Actuated-Coordinated

Splits and Phases: 24: East Columbus Avenue & Union Street & Interstate 91 NB On-Ramp

<p>#24 #25 ø5 ø2</p>	<p>#24 #25 ø1 (R)</p>	<p>#24 #25 ø3</p>	<p>#24 #25 ø4</p>	<p>#24 #25</p>
<p>17 s</p>	<p>33 s</p>	<p>18 s</p>	<p>23 s</p>	<p>9 s</p>

Queues

24: East Columbus Avenue & Union Street & Interstate 91 NB On-Ramp


















						
Lane Group	EBL	EBT	WBT	WBR	NBL	NBT
Lane Group Flow (vph)	232	210	155	212	727	644
v/c Ratio	0.29	0.49	0.49	0.50	0.59	0.52
Control Delay	12.8	16.6	43.6	12.4	22.0	19.7
Queue Delay	0.1	0.4	0.0	0.0	0.0	0.0
Total Delay	12.8	17.0	43.6	12.4	22.0	19.7
Queue Length 50th (ft)	38	70	92	15	114	98
Queue Length 95th (ft)	74	133	151	79	169	184
Internal Link Dist (ft)		135	159			638
Turn Bay Length (ft)					180	
Base Capacity (vph)	869	471	353	452	1283	1288
Starvation Cap Reductn	76	55	0	0	0	0
Spillback Cap Reductn	0	0	0	0	0	0
Storage Cap Reductn	0	0	0	0	0	0
Reduced v/c Ratio	0.29	0.50	0.44	0.47	0.57	0.50
Intersection Summary						

HCM Signalized Intersection Capacity Analysis

2024 Build with Mitigation Conditions

24: East Columbus Avenue & Union Street & Interstate 91 NB On-Ramp

Saturday MIDDAY

											
Movement	EBL2	EBL	EBT	WBT	WBR	WBR2	NBL2	NBL	NBT	NBR	
Lane Configurations											
Volume (vph)	35	180	195	146	109	90	113	556	494	98	
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	
Lane Width	11	11	11	13	13	13	12	12	12	12	
Total Lost time (s)		5.0	5.0	5.0	5.0			5.0	5.0		
Lane Util. Factor		0.97	1.00	1.00	1.00			0.97	0.95		
Frbp, ped/bikes		1.00	1.00	1.00	1.00			1.00	0.99		
Flpb, ped/bikes		1.00	1.00	1.00	1.00			1.00	1.00		
FrT		1.00	1.00	1.00	0.85			1.00	0.98		
FlT Protected		0.95	1.00	1.00	1.00			0.95	1.00		
Satd. Flow (prot)		3385	1837	1963	1669			3467	3440		
FlT Permitted		0.95	1.00	1.00	1.00			0.95	1.00		
Satd. Flow (perm)		3385	1837	1963	1669			3467	3440		
Peak-hour factor, PHF	0.93	0.93	0.93	0.94	0.94	0.94	0.92	0.92	0.92	0.92	
Adj. Flow (vph)	38	194	210	155	116	96	123	604	537	107	
RTOR Reduction (vph)	0	0	0	0	155	0	0	0	15	0	
Lane Group Flow (vph)	0	232	210	155	57	0	0	727	629	0	
Confl. Peds. (#/hr)										4	
Heavy Vehicles (%)	0%	0%	0%	0%	0%	0%	1%	1%	0%	10%	
Turn Type	Split	Split	NA	NA	Perm		Split	Split	NA		
Protected Phases	2 3	2 3	2 3	4			1 5	1 5	1 5		
Permitted Phases					4						
Actuated Green, G (s)		23.4	23.4	16.1	16.1			35.5	35.5		
Effective Green, g (s)		23.4	23.4	16.1	16.1			35.5	35.5		
Actuated g/C Ratio		0.23	0.23	0.16	0.16			0.36	0.36		
Clearance Time (s)				5.0	5.0						
Vehicle Extension (s)				3.0	3.0						
Lane Grp Cap (vph)		792	429	316	268			1230	1221		
v/s Ratio Prot		0.07	c0.11	c0.08				c0.21	0.18		
v/s Ratio Perm					0.03						
v/c Ratio		0.29	0.49	0.49	0.21			0.59	0.51		
Uniform Delay, d1		31.5	33.1	38.2	36.4			26.3	25.5		
Progression Factor		0.75	0.76	1.00	1.00			0.99	1.00		
Incremental Delay, d2		0.2	0.9	1.2	0.4			0.8	0.4		
Delay (s)		23.8	26.2	39.4	36.8			26.9	25.9		
Level of Service		C	C	D	D			C	C		
Approach Delay (s)			24.9	37.9					26.4		
Approach LOS			C	D					C		
Intersection Summary											
HCM 2000 Control Delay			28.1		HCM 2000 Level of Service					C	
HCM 2000 Volume to Capacity ratio			0.54								
Actuated Cycle Length (s)			100.0		Sum of lost time (s)				25.0		
Intersection Capacity Utilization			50.2%		ICU Level of Service				A		
Analysis Period (min)			15								
c Critical Lane Group											

Lanes, Volumes, Timings

2024 Build with Mitigation Conditions

25: West Columbus Avenue & West Union Street/Union Street

Saturday Midday

Lane Group	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Volume (vph)	0	27	7	259	0	0	0	0	0	383	542	2
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Lane Width (ft)	16	16	16	11	11	11	12	12	12	12	12	12
Lane Util. Factor	1.00	1.00	1.00	0.95	0.95	1.00	1.00	1.00	1.00	0.86	0.86	0.91
Ped Bike Factor		0.99									1.00	
Frts		0.972										
Flt Protected				0.950	0.950					0.950	0.989	
Satd. Flow (prot)	0	2082	0	1658	1658	0	0	0	0	1552	4848	0
Flt Permitted				0.950	0.950					0.950	0.989	
Satd. Flow (perm)	0	2082	0	1658	1658	0	0	0	0	1552	4848	0
Right Turn on Red			Yes			Yes			Yes			Yes
Satd. Flow (RTOR)		9										
Link Speed (mph)		30			30			35			35	
Link Distance (ft)		165			215			339			198	
Travel Time (s)		3.8			4.9			6.6			3.9	
Confl. Peds. (#/hr)			5									
Confl. Bikes (#/hr)			1									2
Peak Hour Factor	0.77	0.77	0.77	0.92	0.92	0.92	0.98	0.98	0.98	0.98	0.98	0.98
Heavy Vehicles (%)	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Shared Lane Traffic (%)				50%						41%		
Turn Type		NA		Split	NA					Split	NA	
Protected Phases		3		4 5	4 5					1 2	1 2	
Permitted Phases												
Detector Phase		3		4 5	4 5					1 2	1 2	
Switch Phase												
Minimum Initial (s)		6.0										
Minimum Split (s)		18.0										
Total Split (s)		18.0										
Total Split (%)		18.0%										
Maximum Green (s)		13.0										
Yellow Time (s)		4.0										
All-Red Time (s)		1.0										
Lost Time Adjust (s)		0.0										
Total Lost Time (s)		5.0										
Lead/Lag		Lead										
Lead-Lag Optimize?		Yes										
Vehicle Extension (s)		3.0										
Recall Mode		Min										
Walk Time (s)		5.0										
Flash Dont Walk (s)		8.0										
Pedestrian Calls (#/hr)		10										

Intersection Summary

Area Type: Other
 Cycle Length: 100
 Actuated Cycle Length: 100
 Offset: 70 (70%), Referenced to phase 1:NBT, Start of Green
 Natural Cycle: 80

Lanes, Volumes, Timings
 25: West Columbus Avenue & West Union Street/Union Street

2024 Build with Mitigation Conditions

Saturday Middy

Lane Group	ø1	ø2	ø4	ø5
Lane Configurations				
Volume (vph)				
Ideal Flow (vphpl)				
Lane Width (ft)				
Lane Util. Factor				
Ped Bike Factor				
Frt				
Flt Protected				
Satd. Flow (prot)				
Flt Permitted				
Satd. Flow (perm)				
Right Turn on Red				
Satd. Flow (RTOR)				
Link Speed (mph)				
Link Distance (ft)				
Travel Time (s)				
Confl. Peds. (#/hr)				
Confl. Bikes (#/hr)				
Peak Hour Factor				
Heavy Vehicles (%)				
Shared Lane Traffic (%)				
Turn Type				
Protected Phases	1	2	4	5
Permitted Phases				
Detector Phase				
Switch Phase				
Minimum Initial (s)	15.0	6.0	15.0	4.0
Minimum Split (s)	20.0	11.0	20.0	9.0
Total Split (s)	33.0	17.0	23.0	9.0
Total Split (%)	33%	17%	23%	9%
Maximum Green (s)	28.0	12.0	18.0	4.0
Yellow Time (s)	4.0	4.0	4.0	4.0
All-Red Time (s)	1.0	1.0	1.0	1.0
Lost Time Adjust (s)				
Total Lost Time (s)				
Lead/Lag	Lag	Lead	Lag	
Lead-Lag Optimize?	Yes	Yes	Yes	
Vehicle Extension (s)	3.0	3.0	3.0	3.0
Recall Mode	C-Min	Min	Min	Min
Walk Time (s)	5.0			
Flash Dont Walk (s)	5.0			
Pedestrian Calls (#/hr)	10			
Intersection Summary				

Control Type: Actuated-Coordinated

Splits and Phases: 25: West Columbus Avenue & West Union Street/Union Street

#24 #25 ø5 ø2	#24 #25 ø1 (R)	#24 #25 ø3	#24 #25 ø4	#24 #25
17 s	33 s	18 s	23 s	9 s

Queues
 25: West Columbus Avenue & West Union Street/Union Street

2024 Build with Mitigation Conditions

Saturday Middy



















	→	↙	←	↘	↓
Lane Group	EBT	WBL	WBT	SBL	SBT
Lane Group Flow (vph)	44	141	141	231	715
v/c Ratio	0.19	0.28	0.28	0.34	0.33
Control Delay	35.2	18.6	18.6	18.4	15.9
Queue Delay	0.0	1.4	1.4	0.0	0.0
Total Delay	35.2	20.0	20.0	18.4	15.9
Queue Length 50th (ft)	20	37	37	100	94
Queue Length 95th (ft)	44	75	75	137	77
Internal Link Dist (ft)	85		135		118
Turn Bay Length (ft)					
Base Capacity (vph)	278	464	464	709	2214
Starvation Cap Reductn	0	183	183	0	0
Spillback Cap Reductn	11	0	0	2	9
Storage Cap Reductn	0	0	0	0	0
Reduced v/c Ratio	0.16	0.50	0.50	0.33	0.32

Intersection Summary

HCM Signalized Intersection Capacity Analysis
 25: West Columbus Avenue & West Union Street/Union Street











2024 Build with Mitigation Conditions

Saturday Midday

												
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Volume (vph)	0	27	7	259	0	0	0	0	0	383	542	2
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Lane Width	16	16	16	11	11	11	12	12	12	12	12	12
Total Lost time (s)		5.0		5.0	5.0					5.0	5.0	
Lane Util. Factor		1.00		0.95	0.95					0.86	0.86	
Frbp, ped/bikes		0.99		1.00	1.00					1.00	1.00	
Flpb, ped/bikes		1.00		1.00	1.00					1.00	1.00	
Frt		0.97		1.00	1.00					1.00	1.00	
Flt Protected		1.00		0.95	0.95					0.95	0.99	
Satd. Flow (prot)		2083		1658	1658					1552	4845	
Flt Permitted		1.00		0.95	0.95					0.95	0.99	
Satd. Flow (perm)		2083		1658	1658					1552	4845	
Peak-hour factor, PHF	0.77	0.77	0.77	0.92	0.92	0.92	0.98	0.98	0.98	0.98	0.98	0.98
Adj. Flow (vph)	0	35	9	282	0	0	0	0	0	391	553	2
RTOR Reduction (vph)	0	8	0	0	0	0	0	0	0	0	0	0
Lane Group Flow (vph)	0	36	0	141	141	0	0	0	0	231	715	0
Confl. Peds. (#/hr)			5									
Confl. Bikes (#/hr)			1									2
Heavy Vehicles (%)	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Turn Type		NA		Split	NA					Split	NA	
Protected Phases		3		4.5	4.5					1.2	1.2	
Permitted Phases												
Actuated Green, G (s)		10.7		30.1	30.1					44.2	44.2	
Effective Green, g (s)		10.7		30.1	30.1					44.2	44.2	
Actuated g/C Ratio		0.11		0.30	0.30					0.44	0.44	
Clearance Time (s)		5.0										
Vehicle Extension (s)		3.0										
Lane Grp Cap (vph)		222		499	499					685	2141	
v/s Ratio Prot		c0.02		c0.09	0.09					c0.15	0.15	
v/s Ratio Perm												
v/c Ratio		0.16		0.28	0.28					0.34	0.33	
Uniform Delay, d1		40.6		26.7	26.7					18.3	18.3	
Progression Factor		1.00		0.61	0.61					0.92	0.85	
Incremental Delay, d2		0.3		0.3	0.3					0.3	0.1	
Delay (s)		40.9		16.5	16.5					17.2	15.6	
Level of Service		D		B	B					B	B	
Approach Delay (s)		40.9			16.5			0.0			16.0	
Approach LOS		D			B			A			B	
Intersection Summary												
HCM 2000 Control Delay			16.9			HCM 2000 Level of Service					B	
HCM 2000 Volume to Capacity ratio			0.33									
Actuated Cycle Length (s)			100.0			Sum of lost time (s)				25.0		
Intersection Capacity Utilization			35.9%			ICU Level of Service				A		
Analysis Period (min)			15									
c Critical Lane Group												

Lanes, Volumes, Timings
 16: East Columbus Avenue & Bliss Street

2024 Build with Mitigation Conditions
 Friday Evening











						
Lane Group	WBL	WBR	NBT	NBR	SBL	SBT
Lane Configurations			 			
Volume (vph)	0	357	783	430	0	0
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900
Lane Width (ft)	15	15	12	12	12	12
Lane Util. Factor	1.00	1.00	0.95	1.00	1.00	1.00
Ped Bike Factor						
Frt		0.865		0.850		
Flt Protected						
Satd. Flow (prot)	0	1790	3610	1615	0	0
Flt Permitted						
Satd. Flow (perm)	0	1790	3610	1615	0	0
Link Speed (mph)	30		35			35
Link Distance (ft)	128		266			296
Travel Time (s)	2.9		5.2			5.8
Confl. Peds. (#/hr)		10		10		
Peak Hour Factor	0.92	0.92	0.93	0.93	0.92	0.92
Heavy Vehicles (%)	0%	1%	0%	0%	0%	0%
Shared Lane Traffic (%)						
Sign Control	Stop		Free			Free

Intersection Summary

Area Type: Other
 Control Type: Unsignalized

HCM Unsignalized Intersection Capacity Analysis
 16: East Columbus Avenue & Bliss Street

2024 Build with Mitigation Conditions
 Friday Evening


















						
Movement	WBL	WBR	NBT	NBR	SBL	SBT
Lane Configurations			 			
Volume (veh/h)	0	357	783	430	0	0
Sign Control	Stop		Free			Free
Grade	0%		0%			0%
Peak Hour Factor	0.92	0.92	0.93	0.93	0.92	0.92
Hourly flow rate (vph)	0	388	842	462	0	0
Pedestrians	10					10
Lane Width (ft)	15.0					0.0
Walking Speed (ft/s)	3.5					3.5
Percent Blockage	1					0
Right turn flare (veh)						
Median type			None			None
Median storage (veh)						
Upstream signal (ft)			697			296
pX, platoon unblocked						
vC, conflicting volume	852	441			1314	
vC1, stage 1 conf vol						
vC2, stage 2 conf vol						
vCu, unblocked vol	852	441			1314	
tC, single (s)	6.8	6.9			4.1	
tC, 2 stage (s)						
tF (s)	3.5	3.3			2.2	
p0 queue free %	100	31			100	
cM capacity (veh/h)	299	560			527	
Direction, Lane #	WB 1	NB 1	NB 2	NB 3		
Volume Total	388	421	421	462		
Volume Left	0	0	0	0		
Volume Right	388	0	0	462		
cSH	560	1700	1700	1700		
Volume to Capacity	0.69	0.25	0.25	0.27		
Queue Length 95th (ft)	135	0	0	0		
Control Delay (s)	24.7	0.0	0.0	0.0		
Lane LOS	C					
Approach Delay (s)	24.7	0.0				
Approach LOS	C					
Intersection Summary						
Average Delay			5.7			
Intersection Capacity Utilization			51.5%		ICU Level of Service	A
Analysis Period (min)			15			

Lanes, Volumes, Timings

2024 Build with Mitigation Conditions

24: East Columbus Avenue & Union Street & Interstate 91 NB On-Ramp

Friday Evening

											ø1	ø2
Lane Group	EBL2	EBL	EBT	WBT	WBR	WBR2	NBL2	NBL	NBT	NBR		
Lane Configurations												
Volume (vph)	30	207	294	211	169	117	120	748	714	137		
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900		
Lane Width (ft)	11	11	11	13	13	13	12	12	12	12		
Storage Length (ft)		0			0			180		0		
Storage Lanes		2			1			1		0		
Taper Length (ft)		25						25				
Lane Util. Factor	1.00	0.97	1.00	1.00	1.00	1.00	0.95	0.97	0.95	0.95		
Ped Bike Factor		1.00			0.97			0.99	0.99			
Frt					0.850				0.976			
Flt Protected		0.950						0.950				
Satd. Flow (prot)	0	3355	1837	1963	1669	0	0	3472	3501	0		
Flt Permitted		0.950						0.950				
Satd. Flow (perm)	0	3343	1837	1963	1616	0	0	3437	3501	0		
Right Turn on Red						Yes				Yes		
Satd. Flow (RTOR)					185				22			
Link Speed (mph)			30	30					35			
Link Distance (ft)			215	239					718			
Travel Time (s)			4.9	5.4					14.0			
Confl. Peds. (#/hr)	2	2			5	5	1	1		4		
Confl. Bikes (#/hr)												
Peak Hour Factor	0.92	0.92	0.92	0.98	0.98	0.98	0.95	0.95	0.95	0.95		
Heavy Vehicles (%)	7%	0%	0%	0%	0%	0%	0%	1%	0%	0%		
Shared Lane Traffic (%)												
Turn Type	Split	Split	NA	NA	Perm		Split	Split	NA			
Protected Phases	2 3	2 3	2 3	4			1 5	1 5	1 5		1	2
Permitted Phases					4							
Detector Phase	2 3	2 3	2 3	4	4		1 5	1 5	1 5			
Switch Phase												
Minimum Initial (s)				15.0	15.0						15.0	6.0
Minimum Split (s)				20.0	20.0						20.0	11.0
Total Split (s)				20.0	20.0						24.0	21.0
Total Split (%)				20.0%	20.0%						24%	21%
Maximum Green (s)				15.0	15.0						19.0	16.0
Yellow Time (s)				4.0	4.0						4.0	4.0
All-Red Time (s)				1.0	1.0						1.0	1.0
Lost Time Adjust (s)				0.0	0.0							
Total Lost Time (s)				5.0	5.0							
Lead/Lag				Lag	Lag						Lead	Lag
Lead-Lag Optimize?				Yes	Yes						Yes	Yes
Vehicle Extension (s)				3.0	3.0						3.0	3.0
Recall Mode				Min	Min						C-Min	Min
Walk Time (s)											5.0	
Flash Dont Walk (s)											5.0	
Pedestrian Calls (#/hr)											10	

Intersection Summary

Area Type: Other
 Cycle Length: 100

Lane Group	ø3	ø5
Lane Configurations		
Volume (vph)		
Ideal Flow (vphpl)		
Lane Width (ft)		
Storage Length (ft)		
Storage Lanes		
Taper Length (ft)		
Lane Util. Factor		
Ped Bike Factor		
Frt		
Flt Protected		
Satd. Flow (prot)		
Flt Permitted		
Satd. Flow (perm)		
Right Turn on Red		
Satd. Flow (RTOR)		
Link Speed (mph)		
Link Distance (ft)		
Travel Time (s)		
Confl. Peds. (#/hr)		
Confl. Bikes (#/hr)		
Peak Hour Factor		
Heavy Vehicles (%)		
Shared Lane Traffic (%)		
Turn Type		
Protected Phases	3	5
Permitted Phases		
Detector Phase		
Switch Phase		
Minimum Initial (s)	6.0	4.0
Minimum Split (s)	18.0	9.0
Total Split (s)	25.0	10.0
Total Split (%)	25%	10%
Maximum Green (s)	20.0	5.0
Yellow Time (s)	4.0	4.0
All-Red Time (s)	1.0	1.0
Lost Time Adjust (s)		
Total Lost Time (s)		
Lead/Lag	Lead	
Lead-Lag Optimize?	Yes	
Vehicle Extension (s)	3.0	3.0
Recall Mode	Min	Min
Walk Time (s)	5.0	
Flash Dont Walk (s)	8.0	
Pedestrian Calls (#/hr)	10	
Intersection Summary		

Actuated Cycle Length: 100

Offset: 76 (76%), Referenced to phase 1:NBTL, Start of Green

Natural Cycle: 80







Control Type: Actuated-Coordinated

Splits and Phases: 24: East Columbus Avenue & Union Street & Interstate 91 NB On-Ramp

#24 #25 	#24 #25 	#24 #25 	#24 #25 	#24 #25
24 s	21 s	25 s	20 s	10 s

Queues

24: East Columbus Avenue & Union Street & Interstate 91 NB On-Ramp

						
Lane Group	EBL	EBT	WBT	WBR	NBL	NBT
Lane Group Flow (vph)	258	320	215	291	913	896
v/c Ratio	0.24	0.55	0.60	0.65	0.75	0.72
Control Delay	7.8	13.4	45.0	21.4	34.7	32.9
Queue Delay	0.3	2.2	0.0	0.0	0.0	0.0
Total Delay	8.1	15.6	45.0	21.4	34.7	32.9
Queue Length 50th (ft)	46	177	126	59	261	253
Queue Length 95th (ft)	m47	m181	205	152	#399	#386
Internal Link Dist (ft)		135	159			638
Turn Bay Length (ft)					180	
Base Capacity (vph)	1375	753	357	445	1219	1244
Starvation Cap Reductn	657	297	0	0	0	0
Spillback Cap Reductn	0	0	0	0	0	0
Storage Cap Reductn	0	0	0	0	0	0
Reduced v/c Ratio	0.36	0.70	0.60	0.65	0.75	0.72

Intersection Summary

















- # 95th percentile volume exceeds capacity, queue may be longer.
Queue shown is maximum after two cycles.
- m Volume for 95th percentile queue is metered by upstream signal.

HCM Signalized Intersection Capacity Analysis

2024 Build with Mitigation Conditions

24: East Columbus Avenue & Union Street & Interstate 91 NB On-Ramp

Friday Evening

										
Movement	EBL2	EBL	EBT	WBT	WBR	WBR2	NBL2	NBL	NBT	NBR
Lane Configurations										
Volume (vph)	30	207	294	211	169	117	120	748	714	137
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Lane Width	11	11	11	13	13	13	12	12	12	12
Total Lost time (s)		5.0	5.0	5.0	5.0			5.0	5.0	
Lane Util. Factor		0.97	1.00	1.00	1.00			0.97	0.95	
Frbp, ped/bikes		1.00	1.00	1.00	0.97			1.00	0.99	
Flpb, ped/bikes		1.00	1.00	1.00	1.00			1.00	1.00	
Frt		1.00	1.00	1.00	0.85			1.00	0.98	
Flt Protected		0.95	1.00	1.00	1.00			0.95	1.00	
Satd. Flow (prot)		3355	1837	1963	1622			3472	3501	
Flt Permitted		0.95	1.00	1.00	1.00			0.95	1.00	
Satd. Flow (perm)		3355	1837	1963	1622			3472	3501	
Peak-hour factor, PHF	0.92	0.92	0.92	0.98	0.98	0.98	0.95	0.95	0.95	0.95
Adj. Flow (vph)	33	225	320	215	172	119	126	787	752	144
RTOR Reduction (vph)	0	0	0	0	151	0	0	0	14	0
Lane Group Flow (vph)	0	258	320	215	140	0	0	913	882	0
Confl. Peds. (#/hr)	2	2			5	5	1	1		4
Confl. Bikes (#/hr)										
Heavy Vehicles (%)	7%	0%	0%	0%	0%	0%	0%	1%	0%	0%
Turn Type	Split	Split	NA	NA	Perm		Split	Split	NA	
Protected Phases	2 3	2 3	2 3	4			1 5	1 5	1 5	
Permitted Phases					4					
Actuated Green, G (s)		31.7	31.7	18.2	18.2			35.1	35.1	
Effective Green, g (s)		31.7	31.7	18.2	18.2			35.1	35.1	
Actuated g/C Ratio		0.32	0.32	0.18	0.18			0.35	0.35	
Clearance Time (s)				5.0	5.0					
Vehicle Extension (s)				3.0	3.0					
Lane Grp Cap (vph)		1063	582	357	295			1218	1228	
v/s Ratio Prot		0.08	c0.17	c0.11				c0.26	0.25	
v/s Ratio Perm					0.09					
v/c Ratio		0.24	0.55	0.60	0.47			0.75	0.72	
Uniform Delay, d1		25.3	28.2	37.6	36.6			28.6	28.2	
Progression Factor		0.30	0.39	1.00	1.00			1.00	1.00	
Incremental Delay, d2		0.1	0.7	2.9	1.2			2.6	2.0	
Delay (s)		7.7	11.7	40.4	37.8			31.1	30.2	
Level of Service		A	B	D	D			C	C	
Approach Delay (s)			9.9	38.9					30.7	
Approach LOS			A	D					C	
Intersection Summary										
HCM 2000 Control Delay			28.0			HCM 2000 Level of Service			C	
HCM 2000 Volume to Capacity ratio			0.73							
Actuated Cycle Length (s)			100.0			Sum of lost time (s)			25.0	
Intersection Capacity Utilization			62.3%			ICU Level of Service			B	
Analysis Period (min)			15							
c Critical Lane Group										

Lanes, Volumes, Timings

2024 Build with Mitigation Conditions

25: West Columbus Avenue & West Union Street/Union Street

Friday Evening

Lane Group	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Volume (vph)	0	33	4	325	6	0	0	0	0	498	1345	3
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Lane Width (ft)	16	16	16	11	11	11	12	12	12	12	12	12
Lane Util. Factor	1.00	1.00	1.00	0.95	0.95	1.00	1.00	1.00	1.00	0.86	0.86	0.91
Ped Bike Factor											1.00	
Frt		0.985										
Flt Protected				0.950	0.954					0.950	0.998	
Satd. Flow (prot)	0	2121	0	1658	1665	0	0	0	0	1537	4843	0
Flt Permitted				0.950	0.954					0.950	0.998	
Satd. Flow (perm)	0	2121	0	1658	1665	0	0	0	0	1537	4843	0
Right Turn on Red			Yes			Yes			Yes			Yes
Satd. Flow (RTOR)		6										
Link Speed (mph)		30			30			35			35	
Link Distance (ft)		165			215			339			198	
Travel Time (s)		3.8			4.9			6.6			3.9	
Confl. Peds. (#/hr)												7
Peak Hour Factor	0.58	0.58	0.58	0.93	0.93	0.93	0.92	0.92	0.92	0.92	0.92	0.92
Heavy Vehicles (%)	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%	1%	0%
Shared Lane Traffic (%)				49%						11%		
Turn Type		NA		Split	NA					Split	NA	
Protected Phases		3		4 5	4 5					1 2	1 2	
Permitted Phases												
Detector Phase		3		4 5	4 5					1 2	1 2	
Switch Phase												
Minimum Initial (s)		6.0										
Minimum Split (s)		18.0										
Total Split (s)		25.0										
Total Split (%)		25.0%										
Maximum Green (s)		20.0										
Yellow Time (s)		4.0										
All-Red Time (s)		1.0										
Lost Time Adjust (s)		0.0										
Total Lost Time (s)		5.0										
Lead/Lag		Lead										
Lead-Lag Optimize?		Yes										
Vehicle Extension (s)		3.0										
Recall Mode		Min										
Walk Time (s)		5.0										
Flash Dont Walk (s)		8.0										
Pedestrian Calls (#/hr)		10										

Intersection Summary

Area Type: Other
 Cycle Length: 100
 Actuated Cycle Length: 100
 Offset: 76 (76%), Referenced to phase 1:NBTL, Start of Green
 Natural Cycle: 80
 Control Type: Actuated-Coordinated

Splits and Phases: 25: West Columbus Avenue & West Union Street/Union Street

24 s	21 s	25 s	20 s	10 s

Lane Group	ø1	ø2	ø4	ø5
Lane Configurations				
Volume (vph)				
Ideal Flow (vphpl)				
Lane Width (ft)				
Lane Util. Factor				
Ped Bike Factor				
Frt				
Flt Protected				
Satd. Flow (prot)				
Flt Permitted				
Satd. Flow (perm)				
Right Turn on Red				
Satd. Flow (RTOR)				
Link Speed (mph)				
Link Distance (ft)				
Travel Time (s)				
Confl. Peds. (#/hr)				
Peak Hour Factor				
Heavy Vehicles (%)				
Shared Lane Traffic (%)				
Turn Type				
Protected Phases	1	2	4	5
Permitted Phases				
Detector Phase				
Switch Phase				
Minimum Initial (s)	15.0	6.0	15.0	4.0
Minimum Split (s)	20.0	11.0	20.0	9.0
Total Split (s)	24.0	21.0	20.0	10.0
Total Split (%)	24%	21%	20%	10%
Maximum Green (s)	19.0	16.0	15.0	5.0
Yellow Time (s)	4.0	4.0	4.0	4.0
All-Red Time (s)	1.0	1.0	1.0	1.0
Lost Time Adjust (s)				
Total Lost Time (s)				
Lead/Lag	Lead	Lag	Lag	
Lead-Lag Optimize?	Yes	Yes	Yes	
Vehicle Extension (s)	3.0	3.0	3.0	3.0
Recall Mode	C-Min	Min	Min	Min
Walk Time (s)	5.0			
Flash Dont Walk (s)	5.0			
Pedestrian Calls (#/hr)	10			

Intersection Summary

Queues
 25: West Columbus Avenue & West Union Street/Union Street

2024 Build with Mitigation Conditions

Friday Evening

	→	↙	←	↘	↓
Lane Group	EBT	WBL	WBT	SBL	SBT
Lane Group Flow (vph)	64	178	177	481	1525
v/c Ratio	0.28	0.31	0.31	0.78	0.79
Control Delay	39.0	18.8	18.8	36.0	28.3
Queue Delay	0.0	1.2	1.2	2.3	0.8
Total Delay	39.0	20.0	19.9	38.3	29.1
Queue Length 50th (ft)	35	38	38	323	366
Queue Length 95th (ft)	43	m73	m73	#501	186
Internal Link Dist (ft)	85		135		118
Turn Bay Length (ft)					
Base Capacity (vph)	429	569	572	614	1937
Starvation Cap Reductn	0	221	224	0	0
Spillback Cap Reductn	0	0	0	53	170
Storage Cap Reductn	0	0	0	0	0
Reduced v/c Ratio	0.15	0.51	0.51	0.86	0.86

Intersection Summary

95th percentile volume exceeds capacity, queue may be longer.

Queue shown is maximum after two cycles.



















m Volume for 95th percentile queue is metered by upstream signal.

HCM Signalized Intersection Capacity Analysis

2024 Build with Mitigation Conditions

25: West Columbus Avenue & West Union Street/Union Street

Friday Evening

												
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Volume (vph)	0	33	4	325	6	0	0	0	0	498	1345	3
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Lane Width	16	16	16	11	11	11	12	12	12	12	12	12
Total Lost time (s)		5.0		5.0	5.0					5.0	5.0	
Lane Util. Factor		1.00		0.95	0.95					0.86	0.86	
Frbp, ped/bikes		1.00		1.00	1.00					1.00	1.00	
Flpb, ped/bikes		1.00		1.00	1.00					1.00	1.00	
Frt		0.99		1.00	1.00					1.00	1.00	
Flt Protected		1.00		0.95	0.95					0.95	1.00	
Satd. Flow (prot)		2122		1658	1664					1537	4842	
Flt Permitted		1.00		0.95	0.95					0.95	1.00	
Satd. Flow (perm)		2122		1658	1664					1537	4842	
Peak-hour factor, PHF	0.58	0.58	0.58	0.93	0.93	0.93	0.92	0.92	0.92	0.92	0.92	0.92
Adj. Flow (vph)	0	57	7	349	6	0	0	0	0	541	1462	3
RTOR Reduction (vph)	0	5	0	0	0	0	0	0	0	0	0	0
Lane Group Flow (vph)	0	59	0	178	177	0	0	0	0	481	1525	0
Confl. Peds. (#/hr)												7
Heavy Vehicles (%)	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%	1%	0%
Turn Type		NA		Split	NA					Split	NA	
Protected Phases		3		4 5	4 5					1 2	1 2	
Permitted Phases												
Actuated Green, G (s)		10.7		34.3	34.3					40.0	40.0	
Effective Green, g (s)		10.7		34.3	34.3					40.0	40.0	
Actuated g/C Ratio		0.11		0.34	0.34					0.40	0.40	
Clearance Time (s)		5.0										
Vehicle Extension (s)		3.0										
Lane Grp Cap (vph)		227		568	570					614	1936	
v/s Ratio Prot		c0.03		c0.11	0.11					0.31	c0.31	
v/s Ratio Perm												
v/c Ratio		0.26		0.31	0.31					0.78	0.79	
Uniform Delay, d1		41.0		24.2	24.2					26.2	26.3	
Progression Factor		1.00		0.68	0.68					0.97	0.95	
Incremental Delay, d2		0.6		0.2	0.2					6.4	2.0	
Delay (s)		41.6		16.7	16.7					31.8	27.0	
Level of Service		D		B	B					C	C	
Approach Delay (s)		41.6			16.7			0.0			28.1	
Approach LOS		D			B			A			C	
Intersection Summary												
HCM 2000 Control Delay			26.8			HCM 2000 Level of Service				C		
HCM 2000 Volume to Capacity ratio			0.60									
Actuated Cycle Length (s)			100.0			Sum of lost time (s)				25.0		
Intersection Capacity Utilization			51.3%			ICU Level of Service				A		
Analysis Period (min)			15									
c Critical Lane Group												



Frank P. Fitzgerald
John E. Drost, Jr.
Stephanie A. Fitzgerald †
Brian S. Fitzgerald *
Jane L. Mantolesky
Daniel T. Wright *

†Also admitted in New York
*Also admitted in Connecticut

Direct e-mail: fpf@fitzgeraldatlaw.com

November 18, 2015

Phil Dromey
Office of Planning and Economic Development
City of Springfield
70 Tapley Street
Springfield, MA 01104

RE: Site Plan Review application – Blue Tarp reDevelopment, LLC d/b/a MGM
Springfield (“MGM Springfield”)

Dear Phil:

Enclosed please find with regard to the above application:

1. Landscape and street lighting plans;
2. Signage plan waiver request; and
3. Material matrix.

These submittals are supplemental to the following materials previously submitted to your office.

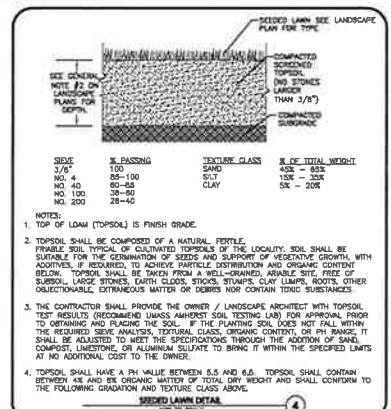
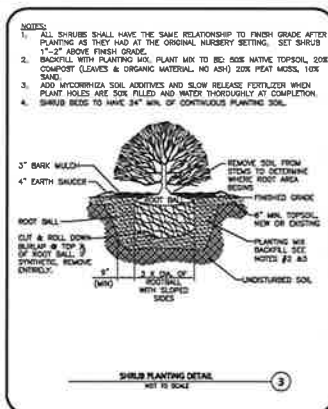
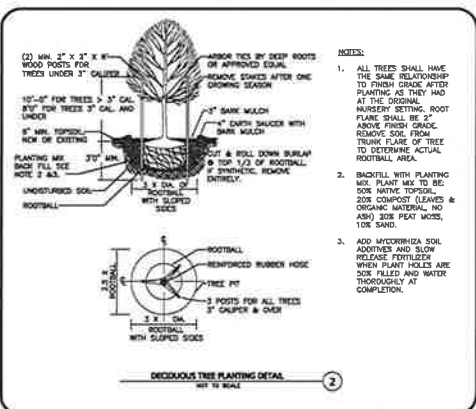
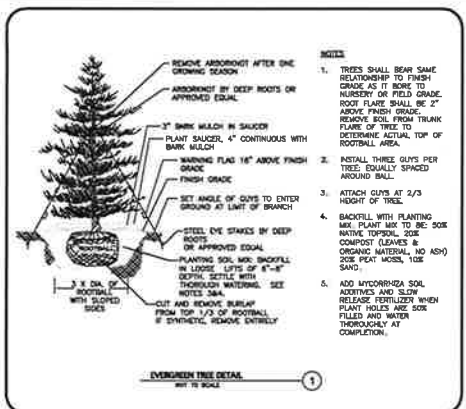
1. Site Plan and elevations submitted on October 19, 2015; and
2. Storm water management submitted on October 28, 2015.

Together the above-referenced documents and materials constitute MGM Springfield’s complete Site Plan submission as of today’s date.

Sincerely,


Frank P. Fitzgerald

FPF/peo
Enclosures



GENERAL NOTES:

1. THE LOCATIONS OF EXISTING UNDERGROUND UTILITIES ARE SHOWN IN AN APPROXIMATE WAY ONLY AND HAVE NOT BEEN INDEPENDENTLY VERIFIED BY THE OWNER OR ITS REPRESENTATIVE. THE CONTRACTOR SHALL DETERMINE THE EXACT LOCATION OF ALL EXISTING UTILITIES BEFORE COMMENCING WORK, AND AGREE TO BE FULLY RESPONSIBLE FOR ANY AND ALL DAMAGES WHICH MAY BE OCCURRED BY THE CONTRACTOR'S FAILURE TO EXACTLY LOCATE AND PRESERVE ANY AND ALL UNDERGROUND UTILITIES.
2. ALL LANDSCAPED AREAS WITH SHRUBS, TREES, AND PERENNIALS TO HAVE 18\"/>

LANDSCAPE NOTES

1. ALL WORK SHALL BE IN ACCORDANCE WITH THE REQUIREMENTS OF THE CITY OF SPRINGFIELD, MO.
2. PLANTING PLAN IS DIAGRAMMATIC IN NATURE. FINAL PLACEMENT OF PLANTS TO BE APPROVED BY THE LANDSCAPE ARCHITECT IN THE FIELD.
3. THE CONTRACTOR SHALL BE RESPONSIBLE FOR CONTACTING ALL UTILITY COMPANIES, ANY PERMITTING AGENCIES, AND "DIG-SAFE" (1-888-344-7233) AT LEAST 72 HOURS IN ADVANCE OF ANY WORK THAT WILL REQUIRE EXCAVATION. CONTRACTOR SHALL NOTIFY THE OWNER'S REPRESENTATIVE OF ANY CONFLICTS IN WRITING.
4. NO PLANT MATERIAL SHALL BE INSTALLED UNTIL ALL GRADING AND CONSTRUCTION HAS BEEN COMPLETED IN THE IMMEDIATE AREA. ANY TREES NOTED AS "DEAD OR SELECTED SPECIMEN" SHALL BE TAGGED AND SEALED BY THE LANDSCAPE ARCHITECT.
5. ALL TREES SHALL BE BALLED AND BURLAPPED (B&B) UNLESS OTHERWISE NOTED OR APPROVED BY THE OWNER'S REPRESENTATIVE AND LANDSCAPE ARCHITECT.
6. CONTRACTOR SHALL VERIFY QUANTITIES SHOWN ON PLANT LIST. QUANTITIES SHOWN ON PLANS SHALL COVER OVER PLANT LIST.
7. ANY PROPOSED PLANT SUBSTITUTIONS MUST BE APPROVED IN WRITING BY OWNER'S REPRESENTATIVE AND LANDSCAPE ARCHITECT.
8. ALL PLANT MATERIALS INSTALLED SHALL MEET THE GUIDELINES ESTABLISHED BY THE STANDARDS FOR NURSERY STOCK PUBLISHED BY THE AMERICAN ASSOCIATION OF NURSERYMEN.
9. ALL PLANT MATERIALS SHALL BE GUARANTEED FOR ONE YEAR FOLLOWING DATE OF ACCEPTANCE.
10. ALL OUTPLANT AREAS NOT OTHERWISE NOTED SHALL RECEIVE 4\"/>

LOAM AND SODDING NOTES

- CONTRACTOR SHALL SOO AREAS NOTED ON THE PLANS.
- SOO IS TO BE A BLEND OF FOUR TO FIVE CURRENT AND IMPROVED HYBRID BLUEGRASS AND PEGOLE MIXER APPROPRIATE FOR BOTH SEMI-SHADED AND AREAS OF SUN.
- HYBRIDS MAY INCLUDE: BLACKSTONE KENTUCKY BLUEGRASS, AWARD KENTUCKY BLUEGRASS, CHALLENGER KENTUCKY BLUEGRASS, BLACKBURN II KENTUCKY BLUEGRASS OR COMPARABLE AND EQUAL BLUEGRASS HYBRIDS.
1. SOO SHALL BE HIGH QUALITY NURSERY GROWN ON CULTIVATED MINERAL AGRICULTURAL SOILS. SOO SHALL BE MOIST, AND MACHINED OUT AT A UNIFORM SOIL THICKNESS OF AT LEAST 6\"/>

PLANTING SCHEDULE-TREES, SHRUBS, GROUNDCOVERS & PERENNIALS

KEY	QUANTITY	BOTANICAL NAME	COMMON NAME	MIN. SIZE	SPACING	COMMENTS
DECIDUOUS TREES						
AR	13	ACER ORIGIN	PAPER BARK MAPLE	2.5\"/>		

KEY	QUANTITY	BOTANICAL NAME	COMMON NAME	MIN. SIZE	SPACING	COMMENTS
CF	TBD	DIARRHENA AURINDUNACA	FEATHER REED GRASS	3 GAL	36\"/>	

KEY	QUANTITY	BOTANICAL NAME	COMMON NAME	MIN. SIZE	SPACING	COMMENTS
AA	TBD	ALBA 'BONKE BEAUTY'	RUSSIE REED	FLATS	6\"/>	

KEY	QUANTITY	BOTANICAL NAME	COMMON NAME	MIN. SIZE	SPACING	COMMENTS
AU	TBD	ALLIUM AFRICANUM	ORNY ALLIUM	BULBS	6\"/>	

ENGINEER:
ALLEN & MAJOR ASSOCIATES, INC.

OWNER:
MGM RESORTS

CONSULTANT:
MGM SPRINGFIELD

REVISIONS:
NO. DATE ISSUE

DRAWING TITLE:
LANDSCAPE PLAN

DATE:
1/24/25

BY:
[Signature]

CHECKED BY:
[Signature]

SCALE:
AS SHOWN

PROJECT:
MGM SPRINGFIELD OFFICE RE-CORE

LA-D



November 18, 2015

By First Class Mail and Email

Phil Dromey
Office of Planning and Economic Development
City of Springfield 70 Tapley Street
Springfield, MA 01104

Re: Casino Overlay District Site Plan Review Application

Dear Phil:

Blue Tarp reDevelopment, LLC d/b/a MGM Springfield ("MGM") is in receipt of your October 26, 2015 letter regarding MGM's Casino Overlay District Site Plan Review Application (the "Application"). Your letter indicated that the Application did not address the "signage and specialty lighting concept" as detailed in Section 8.5 of the Springfield Zoning Ordinance (the "Ordinance"). We previously discussed with your office that our signage and lighting plans would follow at a later date closer to opening as we continue to refine those aspects of the development. Based on further discussions subsequent to submission of our Application, we now understand that you require a formal request to the Application be permitted to proceed with the Site Plan Review process notwithstanding the fact that the "signage and specialty lighting concept" was not included with the Application and will be submitted at a future date. Please accept this letter requesting the same.

Due to the unique nature of the Project¹ and considering that Operations Commencement is not expected to occur until Fall 2018, MGM has not yet determined size, scope, and type of signage appropriate for the Project. Pursuant to Section 12.2.32 of the Ordinance, "[t]he Office of Planning and Economic Development may waive specific submission requirements for a Site Plan Review application upon demonstration by the applicant that a requirement is not necessary or it inapplicable to the applicant's project." The Ordinance provides in addition that, "[d]isapproval of a request in the Site Plan review for a particular specialty signage or lighting component shall not be cause to disapprove the Site Plan Review or the Use and the applicant would still have the right (if the other Site Plan Review criteria were met and approved as per Section 8.5.32) to proceed with the development without the requested specialty signage or with amended specialty signage approved by the City." Ordinance, at Section 8.5.34. MGM is requesting that the Office of Planning and Economic Development ("OPED") proceed with the Application without the complete signage plan so that it may proceed with the development of the Project without delay. An

¹ Capitalized terms not explicitly defined herein shall have the same means as in the Host Community Agreement.

MGM Springfield
One Monarch Place, Suite 910
Springfield, MA 01144
413-273-5000



appropriate signage plan, as required by the Ordinance, will follow once it is fully developed. MGM will continue to keep OPED apprised of its progress in that regard.

Should you have any questions regarding the Application, please feel free to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "Seth Stratton".

Seth Stratton
Vice President & General Counsel

cc: Brian Packer
Frank P. Fitzgerald, Esq.



City of Springfield

Office of Planning & Economic Development
70 Tapley Street
Springfield, MA 01104

CASINO OVERLAY DISTRICT SITE PLAN REVIEW DETERMINATION OF COMPLETED APPLICATION

November 23, 2015

Blue Tarp reDevelopment, LLC
1414 Main Street, Suite 910
Springfield, MA 01144
ATTN: Seth Stratton, Vice President & General Counsel – MGM SPRINGFIELD

Re: Casino Overlay District Site Plan Review

Dear Attorney Stratton:

As per the Determination of Incomplete Application letter, dated October 26, 2015, the Office of Planning & Economic Development had requested additional information with regards to the proposed casino development to be located on the land encompassed by Main Street, Union Street, State Street and East Columbus Avenue. This additional information was requested in order to comply with the zoning regulations outlined in Article 8, Section 8.5 and Article 12, Section 12.3.

After a review of the supplemental information submitted, including but not limited to a detailed landscaping plan, updated utilities plans and details on proposed materials, the Office of Planning & Economic Development has determined that the application for a Site Plan Review, under the provisions of the Casino Overlay District, is now **complete**.

With regards to MGM's request to provide signage and lighting plans at a later date, while the Office of Planning & Economic Development is not waiving this requirement, it is in agreement that the Site Plan Review process can proceed, conditional that once the signage/lighting plans have been fully developed, those plans will be submitted to the City Council for review and approval, as required under the Casino Overlay District.

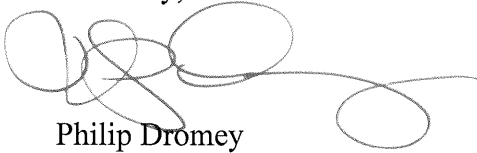
Please note, that since a determination has been made that the application is complete, the timelines for the Casino Overlay Site Plan Review process, as outlined in Article 8, Section 8.5 and Article 12, Section 12.3, have been triggered. This timeline includes the distribution of the plans to the City Council and all appropriate city departments for a thirty (30) day comment

period followed by a City Council hearing within forty five (45) days. Both of these timelines run concurrently.

While the determination has been made that the application is complete, it is likely that additional information may be required as the Site Plan Review process moves forward.

If you have any questions or you need any additional information, you can contact me at (413) 787-6020 or at my email address at: pdromey@springfieldcityhall.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'Philip Dromey', with a long horizontal flourish extending to the right.

Philip Dromey
Deputy Director of Planning
Office of Planning & Economic Development

cc: K. Kennedy, E. Pikula, DPW, Building, City Council, file



Charles D. Baker
GOVERNOR

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November 25, 2015

CERTIFICATE OF THE SECRETARY OF ENERGY AND ENVIRONMENTAL AFFAIRS
ON THE
NOTICE OF PROJECT CHANGE

PROJECT NAME : MGM Springfield
PROJECT MUNICIPALITY : Springfield
PROJECT WATERSHED : Connecticut
EEA NUMBER : 15033
PROJECT PROPONENT : Blue Tarp reDevelopment, LLC
DATE NOTICED IN MONITOR : October 19, 2015

Pursuant to the Massachusetts Environmental Policy Act (G. L. c. 30, ss. 61-62I) and Section 11.10(6) of the MEPA regulations (301 CMR 11.00), I hereby determine that this project change **does not require** the submission of a supplemental Environmental Impact Report (EIR). This Certificate sets forth the issues that must be addressed by the Proponent during permitting and discusses recommendations that were submitted on the project during MEPA review.

Project Change

The project change consists of programmatic and design changes to the proposed MGM Springfield Casino including, but not limited to: relocation of the proposed 54 residential units to an area off-site; relocation and redesign of the proposed hotel; a reduction in gaming positions and back-of-house space; a reduction in the size of the Armory Retail Block development; a reduction in the size of the parking garage; and revision in the anticipated opening date to September 2018. The project building area will be reduced from 881,691 square feet (sf) to 759,157 sf, a reduction of 122,534 sf. Parking will be reduced from 3,762 garage spaces to 3,375 spaces (a reduction of 387 spaces).

The project changes do not require any new State Agency Actions, other than those previously identified in the FEIR.¹

Project History

The Proponent submitted an Environmental Notification Form (ENF) for this project in March 2014. On May 24, 2014 the Certificate on the ENF outlined a scope for a Draft Environmental Impact Report (DEIR). This DEIR was submitted in December 2013, with a Certificate issued on February 7, 2014 indicating that the project adequately and properly complied with MEPA and its implementing regulations and outlined a scope for a Final Environmental Impact Report (FEIR). This FEIR was filed in November 2014, with a Certificate issued on December 31, 2014 indicating that the project adequately and properly complied with MEPA and its implementing regulations and that no further MEPA review was required.

The previously reviewed project consists of a 881,691 gross square foot (sf) mixed-use redevelopment consisting of a casino, a retail and entertainment center, a hotel, apartments, and a daycare center. It is proposed on a 14.5-acre site in downtown Springfield. On November 6, 2014 the Proponent was awarded a Category 1 gaming license pursuant to Chapter 194 of the Acts of 2011: An Act Establishing Expanded Gaming in the Commonwealth and M.G.L. Chapter 23K, Section 19, as amended by Section 16 of the Expanded Gaming Act (the Gaming Act), which authorizes the Massachusetts Gaming Commission (MGC) for Region B of the Commonwealth.² As required by the Gaming Act, a Host Community Agreement between the City of Springfield and the Proponent was signed on May 14, 2013 and approved by the residents of Springfield on July 15, 2013.

The 15.6-acre site described in the FEIR is located in downtown Springfield and is comprised of several city blocks. It includes nine acres of surface parking, 4.2 acres of buildings and 1.8 acres of paved surfaces and sidewalks. It is bounded by Main Street to the northeast, Union Street to the southeast, East Columbus Avenue and Interstate 91 (I-91) to the southwest and State Street to the northwest. The site includes portions of Bliss Street and Howard Street. The Connecticut River and associated parkland is located to the west of the site and I-91. The site contains vacant lots and several buildings that include office, retail and residential uses. Many of the buildings were damaged by the tornado that struck Springfield in 2011. A number of buildings within the site are listed on the National Registers of Historic Places, the State Register of Historic Places and/or in the Inventory of Historic and Archeological Assets of the Commonwealth. The site is located within ½ mile of Union Station and the Springfield Bus Terminal and is served by several bus routes.

The FEIR stated that the redevelopment was designed to take advantage of the existing transportation infrastructure and to integrate the uses into the existing urban fabric by providing

¹ The FEIR erroneously omitted a Sewer Connection Permit from MassDEP as a required permit. This permit was identified in both the ENF and DEIR documents.

² The Act identifies three regions of the state - Region A (Suffolk, Middlesex, Essex, Norfolk and Worcester counties), Region B (Hampshire, Hampden, Franklin and Berkshire counties) and Region C (Bristol, Plymouth, Nantucket, Dukes and Barnstable counties). This project is located in Region B.

access at the street level and design of streetscape elements including shade trees, street furniture, planters, enhanced lighting, street banners, gathering spaces and landscaping. It consists of two primary areas – the Casino Block (739,012 sf) and the Retail Block (142,679 sf).

The Casino Block included the following: 126,701 sf of casino gaming facilities with 3,821 gaming positions; a 250-room hotel (177,351 sf); 45,859 sf of convention space; 7,682 sf of retail space; 48,131 sf of restaurant space; 268,488 sf of casino-related back of house/operational space and 54 apartments (1-3 bedroom units; 64,800 sf).

The Retail Block included a retail and entertainment center ('Armory Square'), an eight-story parking structure to provide 3,762 parking spaces, and a surface parking lot with 54 spaces. It will include a 17,810-sf bowling alley, 42,854 sf of retail space, 20,115 sf of restaurant space, a 47,900-sf multi-screen cinema, an event plaza, 12,000 sf of office space and 2,000 sf of back of house/operational space.

The redevelopment included a combination of new construction, redevelopment of existing buildings, retention of existing infrastructure and facilities, and demolition. The project includes construction of access drives, extensive landscaping, construction of a new stormwater management system and other associated infrastructure. Vehicular access to and circulation within the site is proposed via State Street, Union Street and East Columbus Avenue.

The previously reviewed project was projected to generate a total of 24,851 average daily vehicle trips (adt) on a Friday and 27,590 adt on a Saturday. When adjusted for mode share, vehicle trips were estimated at 19,673 adt on a weekday and 21,925 adt on a Saturday. Water demand was estimated at 244,130 gallons per day (GPD) and wastewater generation was estimated at 221,937 GPD. A total of 3,816 parking spaces (structured and surface) were proposed.

Jurisdiction and Permitting

This project is subject to MEPA review and required the preparation of a mandatory EIR pursuant to 301 CMR 11.03(6)(a)(6) and (6)(a)(7) because it requires a State Agency Action and it will generate 3,000 or more unadjusted new adt on roadways providing access to a single location and it includes construction of 1,000 or more new parking spaces at a single location (301 CMR 11.03(6)(a)(7)).

In addition, the project exceeds the following ENF thresholds:

1. Construction, widening, or maintenance of a roadway or its right-of-way that will cut five or more living public shade trees of 14 or more inches in diameter at breast height (301 CMR 11.03(6)(b)(2)(b));
2. Destruction of all or any part of any Historic Structure site listed in or located in any Historic District listed in the State Register of Historic Places or the Inventory of Historic and Archaeological Assets of the Commonwealth (301 CMR 11.03(10)(b)(1));
3. New discharge or expansion in discharge to a sewer system of 100,000 or more GPD (301 CMR 11.03(5)(b)(4(a)); and,

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4. Approval in accordance with M.G.L. c. 121B of a new urban renewal plan or a major modification of an existing urban renewal plan (301 CMR 11.03 (1)(b)(7)).

The project requires a Gaming License from the MGC. The project requires a Sewer Connection Permit, an Underground Injection Control (UIC) (BRP WS-06) Permit and a Construction Site Dewatering Permit from the Massachusetts Department of Environmental Protection (MassDEP). It may also require Air Quality Permits from MassDEP for certain project components or equipment, such as the proposed CHP unit. It requires a Vehicular Access Permit from the Massachusetts Department of Transportation (MassDOT). In addition, it requires approval from the Department of Housing and Community Development (DHCD) for an urban renewal plan or urban redevelopment project pursuant to M.G.L. c. 121A or 121B.³ The project is subject to review by the Massachusetts Historical Commission (MHC). The project is subject to the EEA Greenhouse Gas (GHG) Emissions Policy and Protocol (the GHG Policy).

The project requires a National Pollutant Discharge Elimination System (NPDES) Construction General Permit from the United States Environmental Protection Agency (EPA) and a Determination of No Hazard to Air Navigation from the Federal Aviation Administration (FAA).

The project may require approval from the Federal Highway Administration (FHWA) for modifications to the highway system (I-91) and/or for work on the National Highway System (NHS). If it does require FHWA approvals, the project may be subject to review pursuant to the National Environmental Policy Act (NEPA), Section 4(f), and Section 106 of the National Historic Preservation Act (NHPA).

Also, the project requires multiple permits and approvals from the City of Springfield, including a Road and Curb Cut Permit, Public Way Discontinuance, and an Application for Re-Zoning. The Proponent has entered into a Host Community Agreement (HCA) with the City of Springfield, which was approved by Springfield voters. The Proponent has entered into Surrounding Community Agreements (SCAs) consistent with the MGC regulations (205 CMR 125.00). The communities that were deemed "Surrounding Communities" per the MGC's regulations were: Agawam, Chicopee, East Longmeadow, Holyoke, Longmeadow, Ludlow, West Springfield, and Wilbraham. I note that the City of Springfield has not approved any proposed changes to its HCA and had not approved any Site Plan Review application under the Springfield Zoning Ordinance to date.

Because the Proponent is not requesting State Financial Assistance, MEPA jurisdiction is limited to the subject matter of required or potentially required permits; however, the subject matter of the Gaming License confers broad scope jurisdiction and extends to all aspects of the project that may cause Damage to the Environment, as defined by the MEPA regulations.

³ This approval was granted on December 31, 2014.

Review of the NPC

The NPC included a description of proposed project changes, revised site plans, and data to support revised estimates of proposed environmental impacts. The project will no longer include approximately 54 residential units. These residential units are a commitment under the Springfield HCA, but were excluded from the boundaries of the MGC license for the casino. The Proponent is currently evaluating off-site locations, including the renovation of existing off-site buildings, to meet this HCA obligation. The NPC included a graphic highlighting the area to the north of the project site targeted by the Proponent for establishment of these housing units. The proposed hotel will be relocated to Main Street where the residential units were previously proposed and modified from a 25-story glass tower to a six-story hotel. The number of hotel rooms (250) will remain unchanged. The overall number of gaming positions will be reduced by 164 to approximately 3,657 and back-of-house space has been reduced by approximately 68,000 sf. Space dedicated to various uses within the Retail Block has been modified in response to advancement of design plans.

The NPC summarized modifications to project square footages within the Casino Block as follows:

Project Element	FEIR Dimension (sf)	NPC Dimension (sf)	Change (sf)
Hotel	177,351	151,861	-25,490
Gaming	126,701	126,262	-439
Retail	7,682	15,204	+7,522
Food and Beverage	48,131	34,184	-13,947
Convention	45,859	43,705	-2,154
Residential ⁴	64,800/54 units	65,500	+200
Operations	268,488	200,605	-67,883
TOTAL	739,012	636,821	-102,191

Modifications to project square footages within the Retail Block include:

Project Element	FEIR Dimension (sf)	NPC Dimension (sf)	Change (sf)
Retail	42,854	16,046	-26,808
Bowling	17,810	9,618	-8,192
Food and Beverage	20,115	24,962	+4,847
Cinema	47,900	37,465	-10,435
Office	12,000	12,000	0
Operations	2,000	18,495	+16,495
Church Relocation ⁵	0	2,489	+2,489
Arcade	0	1,261	+1,261
TOTAL	142,679	122,336	-20,343

⁴ As noted in the NPC, the residences will now be located off-site.

⁵ The relocated church is assumed to be occupied by restaurant space.

Traffic

Parking has been reduced by 387 parking spaces and the parking garage has been reduced by one level to seven stories. Changes to the first floor and elimination of the basement level of the parking garage resulted in modifications to access and egress. The main driveway for self-parking will remain on Bliss Street but has been shifted approximately 50 feet closer to East Columbus Avenue. The main driveway continues to include two entrance lanes and two exit lanes and will serve as the only entrance to the self-parking area of the garage. Egress from the self-parking areas will be provided via connections to Bliss Street (the main driveway), Howard Street and Union Street. Egress to Union Street will be via a secondary ramp from the second level of the garage. Egress to Howard or Bliss Streets will be via the main exit ramp out of the garage, with the left-most lane providing connections to Howard Street and the right-most lane providing connections to the main driveway on Bliss Street.

The previously reviewed project included passenger van parking on the ground floor of the parking garage between two rows of bus parking. Access and egress for passenger vans were proposed via a shared truck/bus driveway on Union Street. Under the proposed plan, passenger van parking will be relocated to an area between Bliss Street and Howard Street on either side of the Central Plant. Access to the passenger van parking and limousine staging area north of the Central Plant will be provided via the main parking garage entrance on Bliss Street and egress provided via a connection to Howard Street. Access and egress to the van parking area south of the Central Plant will be provided via a connection to Howard Street.

Valet parking was previously proposed to be accessed via a full access/egress driveway on Bliss Street, slightly offset from MGM Way. Casino valet pick-up/drop-off was located on the ground floor of the parking garage immediately adjacent to the casino entrance and hotel valet parking access was proposed via an entrance-only driveway on MGM Way opposite Bliss Street and an exit-only driveway onto MGM Way between Bliss and State Streets. Valeted vehicles were to be accommodated in the basement level of the parking garage. Valet parking is now proposed on the first floor of the garage. Casino and hotel valet pick-up/drop-off is proposed in the same location adjacent to the casino entrance. The access ramp to valet parking has been eliminated and access/egress will now be provided via Bliss Street at a four-way intersection with MGM Way.

The previously reviewed project included access for delivery trucks via a new full-access/egress driveway on Union Street. It was proposed approximately 430 feet northeast of East Columbus Avenue with a 140-foot long left-turn lane along Union Street to accommodate trucks waiting to turn into the driveway. Truck loading/unloading areas were proposed in the basement level of the parking garage. Buses were proposed to enter and exit the site via the Union Street truck driveway and discharge and pick-up passengers in a designated parking area on the ground floor of the garage.

The NPC indicates that trucks and buses will not share the entrance driveway from Union Street. This driveway, shifted approximately 65 feet closer to East Columbus Avenue (now 365 feet northeast), will continue to service truck traffic. The proposed left-turn lane along Union Street will be approximately 100 feet long. Bus traffic will use a proposed drop-off area on

MGM Way directly in front of the doors to the casino. Three saw-toothed bus bays will be constructed in a pedestrian-friendly area on the east side of MGM Way. Buses will access the drop-off area via Bliss Street to MGM Way. Upon discharge of passengers, buses will be directed to off-site staging areas to wait until the coordinated pick-up time. The NPC did not identify the location of these potential off-site bus staging areas; it only noted that the Proponent is investigating opportunities to address this issue.

According to the NPC, the modifications to the site plan will result in the following changes to the distribution of traffic trips exiting site driveways:

1. Bus and passenger van traffic exiting the site will shift from Union Street to Bliss Street and Howard Street. The NPC indicates a trip volume of fewer than five bus and passenger van trips during the Friday and Saturday peak hours. Given the small number of trips, this shift in bus and passenger van trips is expected to have a negligible impact on traffic volumes exiting the site.
2. Modifications to exit paths from the parking garage is anticipated to result in redistribution of some traffic that was previously expected to exit via Howard Street to the Union and Howard Street driveways. The NPC concluded that the overall reductions in project trips due to the project changes will negate any potential increases in traffic trips along Bliss Street associated with this change.
3. Patrons that were previously anticipated to use the Howard Street egress toward I-91 South are now expected to be redistributed to Union Street due to the proposed Union Street exit ramps from the second floor of the garage. The NPC concluded that the overall reductions in project trips due to the project changes will negate any potential increases in traffic trips along Union Street associated with this change.
4. Redistribution of vehicle trips is not expected to result in significant changes in traffic volumes and operations at the East Columbus Avenue/Bliss Street intersection because overall traffic volumes remain consistent. Information submitted by TEC on behalf of the Proponent (dated November 9, 2015) supports this statement, indicating that intersection levels-of-service (LOS) remain unchanged (operating at acceptable levels of LOS B or C) from those presented in the FEIR in the 2024 Build with Mitigation Condition.

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While the project modifications are projected to reduce the overall number of traffic trips from the project, the off-site transportation mitigation commitments proposed in the FEIR remain unchanged. According to the NPC, the Proponent, in conjunction with MassDOT, the City of Springfield, and other independent consultants and stakeholders will conduct Road Safety Audits (RSAs) in eight different areas, the results of which may identify additional measures to improve safety that can be incorporated into MassDOT's Section 61 Findings for the project. MassDOT's comment letter concurs that the proposed project changes will not result in overall adverse impacts to the transportation system within the project study area. The Proponent should review MassDOT's letter and update its draft Section 61 Findings as directed by MassDOT.

Several comments from abutters and the City of Springfield identify ongoing concerns with potential impacts to local roadways and businesses surrounding the project site. Many of

these comments focus on pedestrian, bicycle, and vehicle access and egress from the project site and potential impacts to intersection operations. The City of Springfield referenced previous comments submitted on the FEIR focusing on project design and mitigation measures related to traffic and transportation impacts. I anticipate that these concerns will be directly addressed with the City during the local Site Plan Review process.

The Certificate on the FEIR encouraged the Proponent to work with abutters “*to clarify potential project-related impacts, proposed mitigation measures, and seek to remedy additional impacts to the extent the Proponent is legally obligated to do so. The Proponent should continue to evaluate design or operational measures to ameliorate project-related impacts to abutting properties, including but not limited to, design treatments to reduce the visual impact of the garage, confirmation of the constructability of the garage from entirely within the Proponent’s property, mitigation measures to reduce noise, vibration or emissions associated with the proposed central plant, maintenance of safe pedestrian access, and enhanced communication protocols during the construction period.*” This guidance was provided to facilitate the local review process. Comments from abutters and correspondence from the Proponent indicate that meaningful progress on these matters has not been achieved. However, it appears that these concerns are focused on project impacts to local roadways and zoning-related measures such as setbacks and height, and as such are beyond the purview of this MEPA review. The Proponent should continue to work with these abutters in advance of and during the local City of Springfield review process to determine appropriate mitigation measures consistent with City of Springfield requirements. Comments on the NPC will be forwarded to MassDOT for consideration during their permitting process.

Parking

The NPC provided an updated parking demand analysis based upon the revised building program to determine peak parking demand for on-site uses. As noted in the FEIR, the mixture of uses results in opportunities for shared parking given fluctuations in peak demand periods on both weekdays and weekends. Peak parking demand for the project is estimated at 2,928 spaces on Friday and 3,107 spaces on a Saturday, a reduction from 3,101 spaces and 3,269 spaces, respectively as compared to the building program in the FEIR. The garage has been reduced by approximately 387 spaces by removing one of the levels, resulting in a total of 3,437 parking spaces. The parking demand analysis demonstrated that the project will continue to be able to meet peak parking demand requirements with an additional 310 parking spaces to remain available for use by surrounding land uses during this peak period. The NPC also indicated that the reduction in overall parking spaces will provide sufficient parking during the daytime period when surrounding businesses experience their peak parking demand (700 spaces) and the casino facility demand drops (2,336 spaces). The daytime peak demand of 3,036 parking spaces can be met by the proposed parking facility (approximately 88.3 percent occupancy).

Greenhouse Gas Emissions

The Proponent has committed to achieve the same level of GHG reductions described in the FEIR. As noted therein, the implementation of energy-saving and sustainability mitigation measures is estimated to reduce project-related stationary source CO₂ emissions from 10,845

tons per year (tpy) to 8,489 tpy (or 2,356 tpy (21 percent)). These estimates did not include the potential CO₂ reductions associated with proposed on-site and off-site renewable energy commitment (i.e., on-site PV, CHP and REC purchases). If these sources, as presented in the FEIR, are included in the final project, additional GHG reductions will be achieved. These additional reductions, assuming the renewable energy commitment (ten percent) is met through GHG-free sources, and using source energy, is approximately 30 percent (or 4,676 tpy from the Base Case). The FEIR also estimated project-related mobile source CO₂ emissions reductions of 717 tpy, or seven percent between a 2024 Build without Mitigation case (9,795 tpy) and a 2024 Build with Mitigation case (9,078 tpy). The FEIR estimated total project-related CO₂ emissions from combined stationary and mobile source emissions at 17,567 tpy, a 3,073 tpy (or 15 percent) reduction from the Base Case. I remind the Proponent that off-site residential units should be designed and constructed in a manner that avoids, minimizes and mitigates GHG emissions consistent with Commonwealth goals to reduce CO₂ emissions.

Water Supply and Wastewater

Changes to the building program will reduce anticipated water use by approximately 18,888 GPD to approximately 225,242 GPD. Wastewater generation will decrease by approximately 14,319 GPD for a total generation of 207,618 GPD. The NPC included a table of projected water demand and wastewater generation by proposed use (e.g., retail, cinema, etc.) using MassDEP Title 5 rates. Proposed water conservation measures remain unchanged from those identified in the FEIR.

Historic Resources

The project will continue to result in impacts to historic resources. The Proponent intends to use full preservation, partial preservation, and relocation of historic properties within the project site to eliminate, minimize, or mitigate adverse impacts. The Proponent continues to work with the MHC, the Springfield Historical Commission (SHC), the City of Springfield, and the Springfield Preservation Trust on a Memorandum of Agreement (MOA) outlining measures to eliminate, minimize, and/or mitigate the adverse project impacts. A draft MOA was submitted by the Proponent to the MHC on September 24, 2015, accompanied by additional information describing changes to the project program. MHC did not identify any issues with the proposed project changes.

Mitigation and Section 61 Findings

Draft Section 61 Findings included in the FEIR generally remain unchanged and are restated below for clarity.⁶ These draft Section 61 Findings should be revised in response to the Certificate on the FEIR and the NPC and provided to State Agencies to assist in the permitting process and issuance of final Section 61 Findings. The following mitigation measures have been proposed in accordance with the project:

Traffic and Transportation

⁶ Subsequent to a meeting with MassDOT, the proposed location of Intelligent Transportation System (ITS) equipment on State highways has been modified and reflected in the draft Section 61 findings below (per email from Rebecca Brown, TEC, dated November 24, 2015).

Final mitigation measures will be determined in accordance with MassDOT, the City of Springfield and other stakeholders (as necessary) based upon potential revisions in response to comments received on the FEIR and NPC and preparation of permitting documents. Mitigation measures listed below are drawn from Table A and other sections of the proposed Section 61 Findings and the FEIR.

Signal Timing Optimization (Prior to MGM Springfield Opening \$20,000)

- 1. Dwight Street/I-291 WB Ramps,
- 2. East Columbus Avenue/West Columbus Avenue/Main Street/Longhill Street,
- 3. Mill Street/Locust Street/Belmont Avenue/Fort Pleasant Avenue,
- 4. Belmont Avenue/Sumner Avenue/Dickinson Street/Lenox Street

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Union Street Corridor Improvements (West Columbus Avenue to Main Street) – (Prior to MGM Springfield Opening, \$950,000)

- 1. Widen sidewalks along site frontage,
- 2. Complete pavement mill and overlay on Union Street between Main Street and West Columbus Avenue,
- 3. Construct trolley stop adjacent to Armory Square,
- 4. Widen and restripe roadway along site frontage,
- 5. Upgrade accessible wheelchair ramps,
- 6. Install vehicular / pedestrian / bicycle wayfinding signs,
- 7. Install mid-block crosswalk, pedestrian flasher assembly, and raised median island east of MGM Bus Driveway,
- 8. Install bicycle “sharrows” and share-the-road signage,
- 9. Reconstruct Union Street under I-91 Overpass to 5-Lane cross-section,
- 10. Modify vehicular and pedestrian signal phasing scheme at Union Street / East and West Columbus intersections,
- 11. Upgrade vehicular and pedestrian traffic signal equipment and infrastructure at corridor intersections where necessary, and
- 12. Optimize traffic signal timings, clearance intervals, signal coordination, and offset timings at corridor intersections.

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State Street Corridor Improvements (West Columbus Avenue to St. James Avenue) (Prior to MGM Springfield Opening, \$1,110,000)

- 1. Widen sidewalks along site frontage,
- 2. Construct trolley stop adjacent to MGM Springfield,
- 3. Restripe State Street along site frontage,
- 4. Stripe intersection tracking markings across intersection of State Street/Main Street,
- 5. Complete pavement mill and overlay State Street between Dwight Street and East Columbus Avenue,
- 6. Upgrade accessible wheelchair ramps at:
 - 1. State Street/Main Street

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- 2.○ State Street/East Columbus Avenue
- 3.○ State Street/West Columbus Avenue
- 7.● Install vehicular/pedestrian/bicycle wayfinding signs,
- 8.● Install mid-block crosswalk, pedestrian flasher assembly, and raised median island west of MGM Drive,
- 9.● Install bicycle “sharrows” and share-the-road signage, Install bike boxes, shift stop lines, and recalculated clearance intervals at intersections along State Street,
- 10.● _____ Modify pedestrian crossing across East Columbus Avenue north of State Street intersection,
- 11.● _____ Construct pedestrian refuge island along St. James Avenue approach to State Street,
- 12.● _____ Upgrade pedestrian traffic signal equipment only at:
 - 1.○ State Street/Chestnut Street/Maple Street
 - 2.○ State Street/Dwight Street/Maple Street
 - 3.○ State Street/Main Street
- 13.● _____ Upgrade vehicular and pedestrian traffic signal equipment and infrastructure at:
 - 1.○ State Street/East Columbus Avenue
 - 2.○ State Street/West Columbus Avenue
- 14.● _____ Modify traffic signal phasing at intersection of State Street/Main Street, and
- 15.● _____ Optimize traffic signal timings, clearance intervals, signal coordination, and offset timings at corridor intersections.

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Main Street Corridor Improvements (Mill Street to Frank B. Murray Street) (Prior to MGM Springfield Opening, \$440,000)

- 16.● _____ Widen sidewalks along site frontage,
- 17.● _____ Relocate PVTA bus stops along Main Street,
- 18.● _____ Complete a pavement mill and overlay Main Street between State Street and Union Street,
- 19.● _____ Restripe Main Street between State Street and Union Street,
- 20.● _____ Stripe intersection tracking markings across intersection of Main Street/Boland Way/Harrison Avenue,
- 21.● _____ Upgrade accessible wheelchair ramps at:
 - 1.○ Main Street/Union Street
 - 2.○ Main Street/State Street
- 22.● _____ Install vehicular/pedestrian/ bicycle wayfinding signs,
- 23.● _____ Install mid-block crosswalk north of Howard Street,
- 24.● _____ Install bicycle “sharrows” and share-the-road signage between Mill Street and Union Street,
- 25.● _____ Install bike lane northbound and bicycle “sharrows” southbound with share-the-road signage along Main Street between Union Street and Lyman Street,
- 26.● _____ Install bike boxes, shift stop lines, and recalculated clearance intervals at intersections with Boland Way and State Street,

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27.● Install new parking regulation signs along Main Street between State Street and Union Street,

28.● Upgrade pedestrian traffic signal equipment only at:

1.○ Main Street/Falcons Way/Court Street

2.○ Main Street/Boland Way/Harrison Avenue

3.○ Main Street/Worthington Street

29.● Optimize traffic signal timings, clearance intervals, signal coordination, and offset timings at corridor intersections.

30.●

Lyman Street Corridor (Main Street to Dwight Street) (Prior to MGM Springfield Opening \$30,000)

31.● Restripe Lyman Street between Main Street and Dwight Street

32.● Install bicycle lanes and wayfinding signage

East and West Columbus Avenues at Boland Way Improvements (Prior to MGM Springfield Opening, \$490,000)

33.● Install vehicular/pedestrian/bicycle wayfinding signs,

34.● Restripe Boland Way eastbound between East Columbus Avenue and West Columbus Avenue to include 5-foot bike lane,

35.● Stripe intersection tracking markings across intersection of West Columbus Avenue / Boland Way / Memorial Bridge,

36.● Install "sharrows" along Boland Way between East Columbus Avenue and Main Street and along Boland Way westbound between East Columbus Avenue and West Columbus Avenue,

37.● Upgrade accessible wheelchair ramps at:

1.○ East Columbus Avenue/Boland Way

2.○ West Columbus Avenue/Boland Way/Memorial Bridge

38.● Upgrade vehicular and pedestrian traffic signal equipment at:

1.○ East Columbus Avenue/Boland Way

2.○ West Columbus Avenue/Boland Way/Memorial Bridge

39.● Optimize traffic signal timings, clearance intervals, signal coordination, and offset timings at corridor intersections.

East and West Columbus Avenue Corridors Improvements (Boland Way to Union Street) (Prior to MGM Springfield Opening, \$250,000)

40.● Install vehicular/pedestrian/bicycle wayfinding signs,

41.● Restripe West Columbus Avenue southbound approach and Memorial Bridge receiving lanes,

42.● Complete pavement mill and overlay East Columbus Avenue between Union Street and State Street, and

43.● Restripe West Columbus Avenue between Boland Way and Union Street.

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Memorial Bridge (Prior to MGM Springfield Opening, \$570,000)

- 44. Restripe Memorial Bridge cross-section and install bike lanes,
- 45. Remove scored concrete median,
- 46. Reconstruct gaps along former scored concrete median with bituminous asphalt pavement, and
- 47. Complete pavement mill and overlay Memorial Bridge.

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Plainfield Street (Prior to MGM Springfield Opening, \$280,000)

- 1. Restriping the Plainfield Street westbound approach from the existing two through lanes to provide a single through lane and a channelized right-turn lane onto the I-91 NB On-Ramp,
- 2. Restriping Plainfield Street westbound to provide one through travel lane between the I-91 NB On-Ramp and I-91 NB Off-Ramp,
- 3. Restriping the terminus of the I-91 NB Off-Ramp to enter Plainfield Street, west of the intersection, into its own travel lane. This would create a de facto free, unopposed movement exiting the I-91 NB Off-Ramp,
- 4. Construct new sidewalk along Plainfield Street north of US Route 20,
- 5. Remove existing offset sidewalk between the newly constructed sidewalk connections,
- 6. Install new crosswalk with flashing warning assembly and ADA-compliant accessible ramps immediately east of I-91 Ramps,
- 7. Install "No Pedestrian Crossing" signage at locations along the northerly side of Plainfield Street at the I-91 Ramps and Birnie Avenue, and
- 8. Construct accessible wheelchair ramps, install new pedestrian countdown indications and push buttons at Plainfield Street (US Route 20)/West Street (US Route 20)/Plainfield Street/ Avocado Street intersection.

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Intelligent Transportation System Enhancements (Prior to MGM Springfield Opening, \$500,000)

To improve operations and safety in the greater Springfield area, the Proponent has committed to work with MassDOT to deploy variable message signs and install cameras along Route 5 in West Springfield just north of the North End rotary and Memorial Rotary and along Route 57 in Agawam just west of the South End rotary. This equipment would be used to inform the public of the following:

- 1. Detour routes to follow when a traffic incident, construction, or traffic congestion warrants diversion of vehicles to an alternative route;
- 2. Alternative routes to use during special events to avoid traffic congestion or locate appropriate and convenient parking;
- 3. Location of available parking in the Downtown area and routes for access; and
- 4. Other needs identified by MassDOT as part of their normal traffic management procedures.

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The Proponent will work with the PVTA to draft a document that captures all public transportation agreements and commitments on the project, including final details on various components of the proposed transportation mitigation program:

1. Commitment to fund ADA paratransit trips that serve the MGM Springfield site;
2. Provision of trolley/circulator service, at no fare, to be operated by PVTA. The final agreement will clarify the trolley route, stops, and hours of operation;
3. Improvements to bus stops on Main Street, including passenger amenities;
4. Ongoing commitment to maintain bus stops, including snow removal;
5. Working with PVTA and other stakeholders on ways to manage/provide/serve seniors using the current Dial-a-Ride or other alternate means for travel to MGM Springfield;
6. Targeting a transit mode share for employees;
7. Promotion of PVTA passes to MGM employees;
8. Provision of transit information for all users, including prominent placement of information about PVTA service;
9. Implementing onsite PVTA pass and fare sales;
10. Granting preferential shifts to employees who take public transportation, so they can utilize existing service;
11. Committing to regularly review service levels and demand for MGM Springfield with PVTA, and adjust service as necessary;
12. Providing a robust Transportation Demand Management (TDM) program for employees to discourage single occupancy vehicle (SOV) travel and encouraging alternate transportation, including PVTA service; and
13. Completing annual monitoring of transportation usage, with a goal of reaching target mode shares.

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Upon site occupancy, the Proponent will work with the PVTA to assess actual changes to transit demand and identify corresponding mitigation, as warranted.

Fund and implement a TDM program consisting of the following elements:

1. Transit Measures

1. Coordinate with PVTA to periodically review bus service directly serving the site and overall service;
2. Open trolley service for no fare on scheduled service days between the Project site, Union Station, and local attractions; such as: Basketball Hall of Fame and Quadrangle Museum Zone;
3. Promote the use of public transportation and coordinate with PVTA to provide information on the availability of service to employees and patrons;
4. Provide transit schedules and information about program services;
5. Provide improved bus stops with passenger amenities (weather protection, seating, real time information, customer information) near the site;
6. Provide ongoing maintenance of bus stop facilities and amenities installed as part of the Project;
7. Provide preferential shift selection to employees using transit services, and align shifts to the extent possible with PVTA transit service;
8. Provide on-site transit pass sales and offer pre-tax pass sales for employees that enroll in the program;
9. As part of employment application process, ask prospective employees about likely use of public transportation; and

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- 10. Provide a forum for employees to give customer feedback on transit service for Transportation Coordinator to share with PVRTA to target improvements in service. Feedback form can be incorporated in company commute website.

2.0 Pedestrian and Bicycle Measures

- 1. Update and retrofit pedestrian signal equipment at study area intersections surrounding the site and along Main Street between Union Station and the site;
- 2. Provide striping improvements for bicycle lanes or sharrows along with corresponding bike signs;
- 3. Provide pedestrian and bicycle wayfinding signage throughout Downtown Springfield on roadways providing direct access to the site. This includes coordinating with retailers, employers, and property managers to distribute bicycle and pedestrian route maps to casino, hotel, and retail patrons, employees, and residents;
- 4. Provide ADA improvements at wheelchair ramps near the site;
- 5. Provide enhanced connectivity to the Connecticut River Walk and Bikeway;
- 6. Provide secure, weather protected, long-term bicycle parking (for employees and residents) at designated locations within the site;
- 7. Provide bicycle racks for short-term users at several locations on-site;
- 8. Provide bicycles and equipment for employees;
- 9. Implement bicycle share program;
- 10. Provide showers for employees who commute by walking or biking;
- 11. Include a repair station near the bike cages and/or advertised visits by a local mechanic;
- 12. Provide on-site bicycle education classes such as basic maintenance and repairs, rules of the road and winter cycling;
- 13. Canvas employees to identify potential "bicycle captains" and inexperienced cyclists that would be willing to participate in a Bike Buddy Program;
- 14. Reconstruct sidewalks along streets surrounding the site that are affected by construction activities to improve access;
- 15. Construct mid-block crossing with pedestrian warning device on State Street to service the pedestrian traffic between the Project parking structure and the adjacent courthouse;
- 16. Construct mid-block crossing with raised median island on Union Street to service pedestrian traffic to land uses along southerly side of Union Street; and
- 17. "CommuteFit" and "Workout to Work" incentive programs allow participants to log miles each month walked or bicycled to work. The Proponent will work with NuRide to implement these as part of work wellness program with incentivized participation.

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3.0 Parking Measures

- 1. Provide a reduced valet rate for vehicles with three or more patrons;
- 2. Provide preferential parking for rideshare, carpool, and hybrid vehicles. Employers, property managers, or the Transportation Coordinator would

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distribute parking passes or tags provided by MassRIDES to employees and residents participating in recognized rideshare or carpool programs at no cost to the employees or residents. These passes would allow employees and residents to park in reserved spaces dedicated for rideshare and carpool participants that will be strategically located in convenient locations within the parking structure;

- 3. Provide charging stations for electric vehicles, which will be located near the doorways on each floor of the parking structure;
- 4. Implement an intelligent parking system to direct drivers to open parking spaces or nearby facilities controlled by the Springfield Parking Authority;
- 5. Employee parking “buy out” program, which will provide a financial incentive for employees to use alternative modes of transportation; and
- 6. Promote TDM programs alongside sale and delivery of parking information for employees and visitors. This could include a website and traditional print media such as fliers in garages, posters in parking garage and stairwells.

4. Other Measures

- 1. Appoint a Transportation Coordinator on-site to oversee, implement, monitor, and evaluate TDM measures, employed or funded by the Proponent. Responsibilities include:

- 1. Posting and distributing announcements;
- 2. Holding promotional events to encourage ridesharing, using public transit, bicycling, and walking;
- 3. Monitoring the program and assisting in the evaluation;
- 4. Providing transit schedules and information about program services;
- 5. Coordinating on-site sales of transit passes;
- 6. Managing transit subsidy or discount programs for employees;
- 7. Coordinating rideshare and carpool programs and coordinating preferential parking for participants;
- 8. Coordinating with PVTA and MassRIDES to implement TDM programs and improve transit mode share; and
- 9. Collecting and reviewing transportation data and employee surveys and coordinating with transportation consultant for review of post-occupancy conditions and ‘look back’ intersection studies.

- 2. Partner with MassRIDES to implement and monitor TDM measures;
- 3. Offer preferential shifts to employees using transit to align with PVTA service;
- 4. Register employees with NuRIDE to encourage ride-sharing and “green” trips;
- 5. Provide Car Sharing (Zip Car or equivalent) for resident and employee use with convenient spaces located within the parking structure;
- 6. Encourage vanpool and carpooling participation through marketing, events and vanpool formation meetings;
- 7. Offer pre-tax payment option for employee vanpool fares;
- 8. Offer employees a guaranteed ride home program through participation with NuRide;
- 9. Provide and update a monthly Commuter Bulletin;

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- ~~10.~~ Provide real-time traffic/weather information;
 - ~~11.~~ Team up with local partners and provide lunchtime tours to help employees discover local amenities and attractions;
 - ~~12.~~ Promote safe commuting by all modes through a multi-modal safety awareness campaign. Increase awareness of multi-modal user needs with printed, online or interactive information as developed;
 - ~~13.~~ Implement electronic sign-up for TDM programs to support creation of a database of participants to track program effectiveness and costs;
 - ~~14.~~ Facilitate events through coordination with MassRIDES and PVTA; and
 - ~~15.~~ Establish a monitoring system to evaluate TDM goals.
- ~~5.0~~ The TDM program will be modified, as necessary, contingent upon the outcome of the proposed transportation monitoring program, to ensure mode share estimates presented in the FEIR are met.

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Conduct RSAs as part of the 25 percent design process for intersection improvements at the following locations:⁷

- ~~14.~~ Dwight Street/Interstate 291 southbound ramps;
- ~~15.~~ Mill Street/Locust Street/Belmont Avenue/Fort Pleasant Avenue;
- ~~16.~~ State Street between Main Street and Chestnut Street;
- ~~17.~~ State Street between Walnut Street and St. James Street;
- ~~18.~~ Union Street between West Columbus Avenue and Main Street;
- ~~19.~~ Main Street/West Columbus Avenue/East Columbus Avenue/Longhill Street; and
- ~~20.~~ Plainfield Street (US Route 20) between I-91 northbound Exit 9 ramps and the North End Bridge.

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Construct off-site roadway improvements consistent with "Complete Streets" principles to the extent reasonable and practicable. These improvements include:

- ~~21.~~ Reconstruct existing curb cut ramps to bring them into compliance with ADA and AAB regulations;
- ~~22.~~ Reconstruct pedestrian traffic signals to bring them into compliance with the most recent version of the Manual on Uniform Transportation Control Devices (MUTCD);
- ~~23.~~ Bicycle and pedestrian accommodations where feasible such as, "bike boxes" at all signalized intersections to reduce bicycle/vehicle conflicts, new PVTA bus stops and reconfiguration of on-street parking to provide additional safety measurements for pedestrians and bicyclists.

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Complete a Traffic Monitoring Plan (TMP) with an evaluation of the following:

- ~~24.~~ Traffic operations at key study area intersection and roadways surrounding the project.
- ~~1.0~~ Collect the following traffic impact-related data:
 - ~~1.~~ Manual Turning Movement Counts (TMCs) during the Friday evening (4:00 to 7:00 PM) and Saturday midday (11:00 AM to 2:00 PM) peak periods at the following intersections:

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⁷ As noted previously, MassDOT has recently issued updated crash data for 2012. The Proponent will review study area intersections to enable MassDOT to determine if additional intersections will require RSAs prior to completion of 25 percent design plans.

- 1.0 All MGM Springfield and Armory Square driveways;
- 2.0 State Street at Main Street;
- 3.0 State Street at East Columbus Avenue;
- 4.0 State Street at West Columbus Avenue;
- 5.0 Union Street at Main Street;
- 6.0 Union Street at East Columbus Avenue;
- 7.0 Union Street at West Columbus Avenue;
- 8.0 Interstate 291 southbound Exit 2B Off-Ramp at Dwight Street;
- 9.0 I-91 Exit 7 On-and Off-Ramp Intersections with East and West Columbus Avenues;
- 10.0 East Columbus Avenue/Boland Way;
- 11.0 West Columbus Avenue/Boland Way/Memorial Bridge;
- 12.0 Main Street/Harrison Street;
- 13.0 Sumner Avenue/Belmont Street/Dickinson Street; and
- 14.0 State Street/Federal Street/Walnut Street.

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- 2. Automatic Traffic Recorder (ATC) data for a continuous week-long period at the following locations:

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- 1.0 State Street east of East Columbus Avenue;
- 2.0 Union Street east of East Columbus Avenue;
- 3.0 Main Street north of Howard Street;
- 4.0 East Columbus Avenue north of Howard Street;
- 5.0 West Columbus Avenue between State Street and Union Street;
- 6.0 Interstate 91 southbound Exit 6 Off-ramp;
- 7.0 Interstate 91 northbound Exit 6 Off-ramp;
- 8.0 Interstate 291 southbound Exit 2B Off-ramp;
- 9.0 North End Bridge;
- 10.0 South End Bridge; and
- 11.0 Memorial Bridge

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- 2. Compare the site-generated vehicle trips collected in the TMCs at the site driveways with the site-generated vehicle trips estimate included in the DEIR;
- 3. Compare the TMCs with those projected in the DEIR to determine whether the total vehicles entering each intersection exceeds the volumes projected and whether trip distribution patterns generally concur with those project in the DEIR;
- 4. Perform a capacity and queuing analysis to evaluate the traffic operations at the study area intersections and compare to the projections in the DEIR;
- 5. Assess whether additional improvements are necessary at any of the study area intersections and identify measures to improve operations and reduce traffic volumes.

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- 1. The need for mitigation will be conditioned upon exceeding total projected traffic generation through an intersection by more than ten percent or of exceeding the projected overall intersection delay by more than 20 percent.
- 2. The need for additional TDM measures will be conditioned upon exceeding the total projected traffic generation volume by more than five percent.

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2.0 Adequacy of the constructed parking supply;

1. Collect parking utilization counts during the Friday and Saturday peak parking demand periods between 12:00 and 9:00 PM and a weekday morning (non-Friday) between 7:00 AM and 12 PM to assess adequacy of parking supply.

1. Separate parking counts will be conducted in the self-parking garage, hotel and casino valet parking areas and tour bus parking, and Armory Square parking areas.

2. Separate counts will be conducted of utilization of preferential carpool, alternative-fueled vehicle, and EV charging station spaces.

2. Assess whether the constructed parking supply is adequate based upon the observed parking demand.

3. Assess the need for additional TDM measures to improve use of preferential parking or EV charging stations, including increasing the number of these types of spaces to provide additional capacity.

3.0 Effectiveness of TDM measures.

1. Prepare a report on the progress and effectiveness of each TDM measure including narrative and quantitative data;

2. Collect boarding and alighting counts at the PVTA bus stops located along Main Street, Dwight Street, and Chestnut Street in the immediate vicinity of the site;

3. Collect boarding and alighting counts at the proposed trolley stops;

4. Conduct an annual commuter survey for employees to determine mode split (transit, pedestrian, bicycle) and evaluate opportunities to expand or adjust TDM measures.

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Complete "look-back" studies in accordance with the SCA's. The final scope of the look-back approach, including the roadways for evaluation, will be developed in coordination with each respective community, PVPC, the Proponent, and each entity's consultants.

Work with MassDOT during and post permitting to optimize traffic operations and manage access along some project corridors (notably Main Street and Union Street).

Air Quality

1. Implement a TDM program to mitigate the projected emissions increase between the 2024 No Build and 2024 Build conditions (7 percent increase in volatile organic compounds (VOCs) and a 5 percent increase in nitrogen oxides (NO_x)).

2. Install on-site stationary sources of potential air pollutants, including the proposed CHP system in accordance with MassDEP's Environmental Results Program (ERP) or air quality permitting regulations, as applicable.

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Greenhouse Gas Emissions

1. In accordance with the Gaming Act, the project will be required to meet or exceed the following sustainable design and/or energy efficiency requirements:

1.0 Compliance with the Stretch Code;

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- ~~2.~~o Certifiable at the Gold Level or higher under the GBC's LEED program;
- ~~3.~~o Procure through the purchase of RECs or generate on-site at least ten percent of its annual electricity consumption from renewable sources; and
- ~~4.~~o Develop an ongoing plan to monitor all major sources of energy consumption and undertake regular efforts to maintain and improve energy efficiency in building systems.

~~2.~~o Project buildings will incorporate the following elements, or measures achieving similar energy use reductions, into the final Project design:

- ~~1.~~o High efficiency water cooled chillers
- ~~2.~~o Water side economizers
- ~~3.~~o Air side economizers
- ~~4.~~o Variable air volume systems
- ~~5.~~o Variable speed pumping
- ~~6.~~o Variable speed cooling tower fans
- ~~7.~~o Demand controlled kitchen exhaust (with tenant participation)
- ~~8.~~o Increased air filtration
- ~~9.~~o High performance building envelope
- ~~10.~~o Green roof
- ~~11.~~o High-albedo roofs
- ~~12.~~o Premium electric motors
- ~~13.~~o Energy recovery ventilation
- ~~14.~~o Demand controlled ventilation (in garage, and where the occupant density exceeds 40 persons per thousand square feet)
- ~~15.~~o Room occupancy sensors for lighting (and HVAC in hotel rooms)
- ~~16.~~o Daylighting (where possible)
- ~~17.~~o Reduced lighting power density (below ASHRAE guidelines) (except residential and guest room spaces)
- ~~18.~~o High performance lighting
- ~~19.~~o Low-flow fixtures
- ~~20.~~o Energy star appliances
- ~~21.~~o Energy management system
- ~~22.~~o Inspections and air sealing
- ~~23.~~o Enhanced refrigerant management
- ~~24.~~o Regional building materials
- ~~25.~~o Low-VOC adhesives, sealants, paints, carpets, and wood (where feasible)
- ~~26.~~o Incorporation of an approximately 200 kW CHP system, and review of options to increase the CHP size during final design;
- ~~27.~~o Incorporation of onsite solar PV systems, with sizes and locations to be determined during final design. Preliminary analysis identified an estimated average

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