



Deval L. Patrick, Governor
Richard A. Davey, Secretary & CEO



January 31, 2014

Richard K. Sullivan, Jr., Secretary
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114-2150

RE: Springfield – MGM Resort Casino – DEIR
(EEA #15033)

ATTN: MEPA Unit
Nicholas Zavolas

Dear Secretary Sullivan:

On behalf of the Massachusetts Department of Transportation, I am submitting comments regarding the MGM Casino Resort 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,

Clinton Bench
Deputy Executive Director
Office of Transportation Planning

DJM/jll

cc: David J. Mohler, Deputy Secretary/Executive Director, OTP
Frank DePaola, P.E., Administrator, Highway Division
Patricia Leavenworth, P.E., Chief Engineer, Highway Division
Albert Stegeman, District 2 Highway Director, Highway Division
Neil Boudreau, State Traffic Engineer
Stanley Wood, Highway Design Engineer
Kevin Walsh, Director, Environmental Services
PPDU files
MPO Activities files
Pioneer Valley Planning Commission
Pioneer Valley Transit Authority
Planning Department, City of Springfield
Planning Department, Town of Longmeadow
Planning Department, Town of West Springfield
Gordon Carr, Massachusetts Gaming Commission
Kristin Slaton, Director, MassRIDES



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MEMORANDUM

TO: Clinton Bench, Deputy Executive Director

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

DATE: January 31, 2013

SUBJECT: Springfield – MGM – DEIR (EEA#15033)

The Office of Transportation Planning has reviewed the Draft Environmental Impact Report (DEIR) for the MGM Springfield project in Springfield. The proposed project entails the development of a residential, retail, dining and entertainment district in downtown Springfield. Upon completion, the project would create two separate "blocks" of development, referred to as the "Casino Block" and the "Retail Block." The development program has slightly changed from the one described in the ENF. According to the DEIR, the Casino Block would consist of 501,108 square feet (sf) of development, which would include:

- A hotel,
- 3,821 casino gaming positions,
- Retail and restaurant uses,
- Convention space,
- Office space, and
- 54 residential apartments.

The Retail Block would consist of approximately 159,397 sf of development that would include the following uses:

- Retail/restaurant space,
- A bowling alley,
- Office space,
- A radio station,
- An event plaza, and
- A multi-screen cinema.

The project site comprises approximately 14.5 acres bounded by Main Street to the northeast, Union Street to the southeast, East Columbus Avenue to the southwest, and State Street to the northwest. 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 DEIR, the project at full build is expected to generate approximately 24,851 new vehicle trips on an average weekday and 27,590 new vehicle trips on an average Saturday. The project is categorically included for the preparation of an Environmental Impact Report (EIR). The project requires a Vehicular Access Permit because of roadway improvements proposed at several locations under MassDOT jurisdiction to mitigate the project's traffic impacts.

The DEIR includes a transportation study prepared in conformance with EOEEA/MassDOT Guidelines for Transportation Impact Assessments. The study includes a comprehensive assessment of the transportation impacts of the project based on a thorough analysis of existing conditions, future No-Build conditions, and future Build conditions. The DEIR includes a comprehensive mitigation program that is intended to offset most of the adverse impacts of the project. The mitigation program is multi-faceted and includes highway, transit, bicycle, and pedestrian improvements. The proponent has also committed to an aggressive transportation demand management (TDM) program to reduce automobile trip demand and further mitigate the impacts of the project. MassDOT is generally satisfied with the proponent's commitment to mitigation, and we concur with most of the DEIR transportation findings. However, MassDOT has a number of comments on the DEIR analysis, and issues that should be addressed in the FEIR, as noted below.

Trip Generation

The overall trip generation calculation for the project is based on the trips that would be generated by each use separately, and then a share-trip credit is assumed between some of the uses. The calculations for the casino are based on empirical data, while calculations for other uses are based on the Institute of Transportation Engineers (ITE) *Trip Generation Manual* for ITE Land Use Code (LUC) 310 for Hotel trips, ITE LUC 220 for residential apartments, and ITE LUC 820 for the Armory Square retail facility. According to the DEIR Trip Generation Summary table, the project is expected to generate 24,851 new vehicle trips on an average Friday, including 1,581 vehicle trips during the Friday PM peak hour, and 27,590 new vehicle trips on an average Saturday, including 1,826 vehicle trips during the Saturday peak hour. Assuming credits for multi-purpose trips (i.e. trips to more than one land use on the project site) and multimodal trips, the DEIR asserts that the project is expected to generate 1,290 new primary trips during the Friday PM peak hour and 1,312 new vehicle trips during the Saturday PM peak hour.

As requested by MassDOT in our comment letter on the project's Environmental Notification Form (ENF), the DEIR has updated the trip generation summary to show all assumptions. The DEIR also provides information on the size, location, and traffic volume of the comparable casino sites that were used to establish a correlation between the number of gaming positions and trip generation. The trip generation has also been revised to account for mode share and credits for multi-purpose trips, transit trips, and hotel trips.

The DEIR also includes a temporal distribution of 24-hour traffic over the course of a week based on data collected at the MGM Casino in Detroit, which was used to determine the hourly distribution and peak-hour of casino traffic. Based in this information, the most critical peak analysis periods, which consist of the highest combination of existing roadway volumes and project site trips, were determined for the DEIR traffic operations analyses.

During the preparation of the DEIR, the proponent met on numerous occasions with MassDOT to discuss and reach a consensus on the comparables, the rates, and the appropriate credits. MassDOT is generally satisfied with the level of information provided on how the overall trip generation was derived for the project as a whole. However, the FEIR should include more detailed information on the employee demand distribution based on the nature of work shifts. According to the DEIR, the proponent and/or its tenants will provide flexible schedules to a number of employees working at the site. The proponent should evaluate the impacts of instituting different shift schedules around the availability of transit services in order to maximize transit usage by employees.

Transit Demand and Mode Split

The DEIR includes an analysis of the additional demand that would be generated by the project based on the frequency and the span of service of the existing Pioneer Valley Transit Authority bus routes. The proponent has also met with MassDOT to discuss and review the transit trip generation and trip assignments for the project. In order to estimate mode share and transit demand for MGM Springfield, the proponent used data collected on mode share for casino and hotel patrons and employees at MGM Detroit, as well as 2010 US Census Journey-to-Work data for workers in Springfield. To estimate mode share for the retail and residential components of the project, the proponent used a different methodology based on Transportation Impact Factors-Development Around Bus Transit Corridors presented in the ITE Trip Generation Manual Handbook, 2nd edition. In both cases, MassDOT believes that the methodologies used are generally acceptable, and that the DEIR includes sufficient documentation to justify the mode share and estimate transit demand.

Trip Distribution

The DEIR includes gravity models, which provide trip distribution for the different land uses of the development program. The trip distribution for the casino component of the project is based on a detailed gravity model using economic marketing data supplied by MGM Resorts International, and supplemented by US Census 2010 population data for municipalities within a two-hour radius of the site. The gravity models for the remaining land uses were based on US Census 2010 data and/or US Census Journey-to-Work information for employees within Springfield. In all cases, the models were adjusted to reflect all appropriate factors such as population, travel time, and proximity of the projects to other potential casinos in Massachusetts. The results of the gravity models were used to determine trip characteristics for casino patrons, shoppers, and employees, and to create trip distribution networks for the different peak hours of the project. The DEIR provides all appropriate documentation of the trip distribution and assignment to the roadway network and the transit system.

Transportation Projects in the Study Area

The DEIR includes a list of transportation projects currently planned or under consideration by MassDOT or others within the study area. Most of these projects were communicated to the proponent during the preparation of the DEIR. Some of these projects have progressed, others have been eliminated from further consideration, and the future of other projects is still uncertain. The FEIR should update the assumptions used in the TIA based on the latest information as provided below. Where these changes may impact planned mitigation or operations, the proponent should provide revised analysis and/or mitigation as appropriate.

- MassDOT has completed the installation of the ITS infrastructure on I-91 and I-291. There is a current year project #607422 to install a Real Time Traffic Management System (RRTM) on I-90, I-91 and I-291 and various other locations. The proponent should incorporate this project with the proposed ITS elements of their proposed mitigation program.
- The feasibility of continuing Memorial Avenue through the rotary was evaluated as part of the US Route 5/Route 147 Bridge Improvement project #605353 and found unsuitable for advancement. This improvement is no longer under consideration.
- The schedule for the I-90 Interchange 6 project has been delayed and construction is not expected to begin in 2014, but may still be completed prior to the proposed opening of MGM Springfield.
- The MassDOT I-91 Viaduct Project schedule may overlap with the construction of MGM Springfield; therefore, the proponent should closely coordinate the traffic management plan associated with the I-91 Viaduct Project with any construction plans for the development.

The proponent should also coordinate with the City of Springfield and the Massachusetts Environmental Policy Act (MEPA) Office to find out information about any land development projects that may affect the study area, and incorporate these into the FEIR analysis.

Project Permitting

The FEIR should anticipate that additional federal permits may be required as a result of the proposed roadway improvements and/or impacts to historic resources. Therefore, MassDOT recommends that the proponent conduct preliminary consultation with the Federal Highway Administration (FHWA) on National Environmental Policy Act (NEPA) Class of Action or any other federal approvals. MassDOT is happy to participate in these discussions if desired.

The project proponent has identified a number of roadway modifications on- and off-site, on both local roadways and/or roadways under state jurisdictions. The DEIR is not clear on whether these roadways are on the National Highway System (NHS) or whether the proposed improvements would require design exceptions. Projects proposing design exceptions on NHS roadways must comply with NEPA. For example, the DEIR suggests that State Street is the only NHS roadway near the project in the City of Springfield; however, it does not provide NHS status for proposed

improvements outside the project area, such as to the North End and Memorial Bridge Rotaries. The functional classification of these roadways and all pertinent permitting and/or approvals should be addressed in more detail in the FEIR. Similarly, modifications to the Interstate highway system, in this case I-91, which may need FHWA approval under the Interstate Access Policy, would be federal actions that trigger NEPA.

NEPA requires Section 106 compliance. For MassDOT Highway Division projects, Section 106 activities are carried out by the Highway Division's Cultural Resources Section (CRS). If applicable in this case, the Section 106 process would need further discussion with all interested parties. CRS review would include potential impacts to historic resources adjacent to project mitigation locations, which were not included in the DEIR. Depending on the results of the consultations with FHWA, Section 106 and NEPA may be added to the list of required regulatory approvals on the federal level. Section 4(f) may also apply due to potential impacts to existing buildings, which may have historic value and the proposed changes to the Leonardo daVinci playground, although these resources are not part of an existing transportation facility.

Since the project is no longer proposing a dock on the Connecticut River with associated improvements to the Connecticut River Bikeway, the proponent no longer expects to require a Section 404 permit from the US Army Corps of Engineers for alterations of wetland resources adjacent to the Connecticut River. Thus, if NEPA is triggered as discussed above, FHWA would be the lead federal agency for NEPA compliance.

MassDOT notes that the project's second site (the Retail Block) is not shown in all the figures in the DEIR, particularly the introductory Figures 3-1 and 3-2, nor are its boundaries given in the Project Description (Section 3.1). As it pertains to the discussion of historic resources, the Retail Block site does not appear in Figure 5.7-1 for historic sites. In light of the age of the buildings to be demolished, the proponent should consult with the appropriate agencies to clarify their historic status and document these discussions in the FEIR.

Traffic Operations

The DEIR presents a comprehensive evaluation of traffic operations that includes a substantial number of intersections within the study area. This includes intersections that had been identified in the ENF, as well as additional intersections and roadway segments that were recommended for inclusion in MassDOT's ENF comment letter. The TIA includes capacity analyses and a summary of average and 95th percentile vehicle queues for these intersections. The TIA also presents merge and diverge for all ramp junctions, and analysis for all the weaving movements along the interstate system of I-90, I-91, and I-291 in the study area. MassDOT has reviewed the traffic impacts of the project on traffic operations in the vicinity of the project and its potential impacts on state highway locations including overall operation of the express highway system. Based on the DEIR review, the following concerns should be addressed in the FEIR.

- The Town of Longmeadow has requested consideration of a project to make intersection improvements at the intersections of Longmeadow Street (Route 5) at Forest Glen Road, Longmeadow Street at Converse Street and Converse Street at Laurel Street. The project was put on hold relative to the MassDOT project development process pending an I-91 corridor study, but based on the "Intersection Improvement Study" prepared by VHB for the

town dated March 2011; it is likely that there is a need for improvements at these intersections. Because these Longmeadow intersections, and especially the Route 5 southbound queue at the Forest Glen intersection, could potentially impact the MassDOT jurisdiction ramps at I-91 Interchange 1, the proponent should confirm whether Friday PM Peak is the “critical” analysis period for the Route 5 corridor, and provide additional analyses as needed if the critical period is other than Friday PM. MassDOT data on Route 5 from 2009 indicates Friday traffic volumes are 18-20% below the other weekday volumes. Additionally, the proponent’s analysis indicates better LOS and shorter queues on Route 5 SB toward the I-91 ramps than the earlier analysis performed for the town, but it appears to be due to a much larger volume of this regional traffic from the I-91 ramp turning left (511 vs. 250) onto Forest Glen and eventually Laurel Street, a residential street with smaller setbacks to dwellings than Route 5 or Converse Street.

- The study area in the vicinity of the MGM Casino project consists of street blocks with a number of closely spaced signalized and unsignalized intersections. MassDOT has identified a number of intersections within the study area for which the 95th percentile queues seem to exceed the available queue storage distances. These locations are generally under City of Springfield jurisdiction. A few intersections are under state jurisdiction or else have the potential to impact state highway operations. These queues could block upstream intersections and potentially impact overall system operations of the network. The FEIR should include a comparison of all queues with the available queue storage distances in order to determine where they may have a critical impact in overall traffic operations. While we understand that some of these conditions already exist and the feasibility of providing geometric improvements may be limited at some of these locations due to right-of-way constraints, the information would guide how to best optimize the overall network. In particular, MassDOT is concerned about the potential of systemwide deficiencies impacting operations at Union Street intersections with East and West Columbus Avenue, which could in turn impact operations of the I-91 northbound and southbound ramps. The same concerns apply for the intersection of West Columbus Avenue with Boland Way and the Memorial Bridge, where queuing could exacerbate existing congested conditions on the bridge.
- According to the capacity analysis, the unsignalized intersection of I-91 ramps with Plainfield Street is expected to operate at LOS F during the 2024 No-Build and 2024 Build conditions, with significant queuing on the I-91 northbound Exit 9 Off-Ramp southbound approach. In addition, the crash rate at this intersection is higher than the state and district averages. Even though it is an existing condition, trip distribution for the project indicates that approximately five percent of project-related traffic is expected to travel through this intersection to cross the North End Bridge towards Route 20. The proponent should therefore identify mitigation measures that would improve operating conditions.
- MassDOT also recommends that the West Street (US20)/Riverside Road intersection in Springfield at the North End Bridge be evaluated because of its close proximity to the West Street/Plainfield Street intersection. This is an NHS Route and the North End Bridge is under MassDOT jurisdiction.

Where appropriate, the FEIR should discuss how proposed system improvements and impacts to one mode can be measured relative to the improvements and impacts of the other modes.

Pedestrian Access

The DEIR indicates that the project would provide pedestrian improvements to increase pedestrian safety and accessibility at a number of intersections and along roadways near the project area. These improvements would generally include pedestrian signal equipment, ADA compliant accessible ramps, sidewalk construction and other pedestrian amenities. These improvements are generally centered on the State Street and Union Street corridors. Given the multimodal nature of the project and the urban context of its location, MassDOT believes that the scope of the pedestrian improvements should increase to include additional intersections within walking distance of the project.

In the ENF comment letter, MassDOT requested that the DEIR provide a thorough inventory of all existing, planned, and proposed services, facilities, and routes for accessing the site. The FEIR should provide a more detailed pedestrian plan that identifies the existing pedestrian infrastructure and highlights the proposed improvements. The conceptual plans should preferably be 80-scale in order to verify the feasibility of constructing such improvements. The conceptual plans should clearly show proposed lane widths and offsets, layout lines and jurisdictions, and the land uses (including access drives) adjacent to areas where improvements are proposed.

Bicycle Access

The DEIR proposes improvements to the existing bicycle network within the vicinity of the project. The DEIR did not include the level of detailed information and analysis on bicycle facilities and access that was requested; however, the proponent has proposed a comprehensive program for improving bicycle access the site. These accommodations consist for the most part of enhancements to the Connecticut Riverwalk and Bikeway, bicycle pavement markings and signage along a number of identified bicycle corridors, bicycle racks, bicycles and equipments for employees and residents, bicycle share programs, bicycle and pedestrian route maps, and showers and lockers for employees to further encourage walking or bicycling to and from work. Some of these accommodations need to be further described, and more details provided as to the feasibility of their implementation and the proponent's commitment to ensure the sustainability of these measures. For example, the DEIR is not clear on which party would be responsible for the bicycle share program and the details of its implementation.

As with the proposed pedestrian improvements, the FEIR should provide conceptual plans (preferably 80-scale) for any proposed improvements to bicycle facilities in order to verify the feasibility of constructing such improvements. The conceptual plans should clearly show proposed lane widths and offsets, layout lines and jurisdictions, locations of bicycle racks, and the land uses (including access drives) adjacent to areas where improvements are proposed. The bicycle plan provided did not include sufficient details to ascertain the design standards described in our comment letter and required by MassDOT's design guidance.

On- and Off-Site Improvements

The DEIR includes a list of potential improvements comprising geometric modifications at a number of locations to improve safety and accommodate pedestrians; traffic signal coordination and optimization; queue detection along interstate ramps to improve mobility; way-finding signs to direct patrons to the most efficient access and egress points; and coordination with MassDOT to deploy variable message signs on I-91 and I-291 in order to notify motorists of traffic conditions within the downtown area.

The proposed improvements are generally consistent with MassDOT standards, provide for multimodal travel in the study area, and are proposed at key intersections that interact with the Interstate system and along critical corridors that provide access to the site. For the most part, the proposed mitigation measures would improve LOS, reduce delay, and improve pedestrian and bicycle circulation. Nevertheless, some intersections and corridors are expected to continue to experience congested conditions, and the proposed improvements will need further refinements. MassDOT has reviewed these improvements and has the following comments that should be addressed in the FEIR.

Road Safety Audit

Several of the intersections where improvements are proposed are designated crash clusters. The proponent should be aware that Road Safety Audits (RSAs) will be required in order to assess safety issues and develop recommended mitigation measures for these locations. The proponent should also review all identified high crash locations in Springfield and in surrounding communities and determine whether any would be expected to accommodate significant volumes of casino-related traffic. If so, the proponent should also prepare RSAs at these locations and determine whether mitigation is warranted.

East Columbus Avenue/Union Street/I 91 northbound on-ramp

The proponent has proposed to reconstruct the Union Street leg of the intersection under the I-91 overpass to provide a 5-lane cross-section, including a 10-foot exclusive left-turn lane onto the I-91 northbound on-ramp, a 10-foot exclusive left-turn lane onto East Columbus Avenue, and an 11-foot through lane. This would require the narrowing of the shoulder to approximately 2 feet along each side of Union Street. An alternative cross section would provide a 4-lane cross section with wider travel lanes and bicycle lanes under the bridge. MassDOT requires more detailed information to ensure that the selected alternative is compatible with Complete Streets design standards. The proponent should provide more detailed conceptual plans than those presented in the DEIR for MassDOT review prior to the submission of the FEIR.

South Bridge and Memorial Bridge Rotaries

The DEIR includes conceptual plans for improvements at both the South End Bridge and Memorial Bridge rotaries. The improvements would consist generally of pavement markings, sign control, and striping modifications to better define lane utilization through the rotaries and improve safety. As part of improvements projects associated with the I-91 Viaduct Project, MassDOT is contemplating improvements at these locations. Should the MGM casino project proceed ahead of

the MassDOT project, the proponent should commit to implementing these improvements as designed by MassDOT prior to site occupancy.

The proponent should continue consultation with MassDOT to refine the above and other improvements proposed at state highway locations. The FEIR should include sufficiently detailed conceptual plans (preferably 80-scale) for any proposed roadway improvements in order to verify the feasibility of constructing such improvements. The conceptual plans should clearly show proposed lane widths and offsets, layout lines, road jurisdictions, and the land uses (including access drives) adjacent to areas where improvements are proposed.

Any proposed mitigation within the state highway layout must be consistent with a Complete Streets design approach that provides adequate and safe accommodation for all roadway users, including pedestrians, bicyclists, and public transit riders. Guidance on Complete Streets design guidelines is included in the MassDOT *Project Development and Design Guide*. Where these criteria cannot be met, the proponent should provide the justification as to the reason why, and should work with the MassDOT Highway Division to obtain a design waiver.

Public Transportation

The DEIR includes a comprehensive evaluation of the Pioneer Valley Transit Authority (PVTA) system, which provides public transportation in the vicinity of the site, downtown Springfield, and surrounding communities that will produce casino trips. The evaluation is based on a transit study that analyzes existing and future transit system conditions, bus frequency and capacity, projection of future demand, and identification of a transit mitigation plan to reduce site vehicular traffic. According to the study, PVTA currently possesses sufficient capacity to accommodate the projected ridership associated with the project without the need to add capacity. Nevertheless, the PVTA is currently conducting a Comprehensive Service Analysis (CSA), which will provide a detailed evaluation of the PVTA system and make recommendations to improve overall service for its host communities and riders.

According to the DEIR, the CSA is expected to result in changes to the PVTA system. These changes would entail increased frequencies on some routes, expanded service hours beyond the current service hours, and new weekend and holiday services in some additional communities. These service enhancements would improve transit access to the MGM Casino development and would enable both casino patrons and employees to take better advantage of the PVTA system as an alternative option to travel to the site.

The proponent should be mindful of these improvements and match the proposed PVTA expansion with a strong incentive program to encourage both employees and casino patrons to use the service. Such a commitment could be a model for other employers within the area and assist PVTA in increasing ridership, and collecting additional revenue, which could perhaps result in further improvement and expansion of the services. The DEIR commitment on transit lacks specifics to that end. The FEIR should clearly provide more information on employee shifts, how they align with the expanded service hours, the level of commitment to provide incentives to employees to use the system, and quantitative measures to achieve the 16 percent transit ridership identified as mode share.

The proponent has also committed to initiating and funding a trolley service that would connect the casino patrons to a number of key touristic destinations within the City of Springfield. The service will also make stops at some of the main transportation hubs such as Union Station to connect with the PVRTA system. The proponent should closely coordinate with PVRTA the trolley service routes, frequencies, and fare policy to ensure that the two services are complementary.

The FEIR should also identify any other system improvements that would further enhance employee and patron access to the proposed casino development, and should commit to funding these improvements. The FEIR should also provide additional information on site design and transit accommodation to demonstrate that the proponent is providing transit access that is at least as attractive and convenient as the access provided to travelers by automobile.

Parking

According to the DEIR, the project would replace a substantial portion of the existing site surface parking, which has a total capacity of 1,000 on-street and off-street parking spaces, with a new parking garage that would provide 3,740 car parking spaces and 22 bus parking spaces. The DEIR includes a comprehensive analysis of parking demand for the project and the parking needs for the surrounding area. MassDOT is generally satisfied with the methodology used to determine the total parking required.

However, the proponent should further evaluate the proposed parking policies in order to minimize parking demand and automobile use. According to the DEIR, the project is proposing free parking for both casino patrons and employees, and the DEIR does not outline a comprehensive policy or program to limit employee parking on site. The proponent should consider means to limit this free on-site parking especially for employees. Options may include the provision of satellite parking for employees and patrons with shuttle services and/or public transportation for transfer to the site, and implementation of strong incentives to travel by modes other than automobile (as described below in the section on transportation demand management). These measures would assist in further site trip reduction in and around the project site and strengthen the overall TDM program.

Transportation Demand Management

The DEIR includes a revised Transportation Demand Management (TDM) program that is generally responsive to MassDOT's comments on the ENF. The TDM plan has committed to a wide range of measures aimed at reducing trip generation and promoting the use of existing and new pedestrian, bicycle, and transit facilities. These measures are generally classified as follows: transit measures, pedestrian improvements, bicycle improvements, parking measures, and other measures. Some of the details of TDM proposal related to pedestrian, bicycle, transit, and parking were discussed above.

The FEIR should address in greater detail the specifics of some of the TDM measures to be implemented, especially those designed to ensure that patrons and employees use transit to the greatest degree possible. Specifically, the FEIR should describe how shifts will be scheduled so that as many employees as possible can utilize transit. The DEIR indicates that the casino facility would provide flexible hours for employees; however, the FEIR should provide more detail in order to demonstrate how the project would reach the 16 percent ridership expected to reduce site generation. The proponent

is reminded that MassDOT concurrence with the trip generation rate for the project was partially based on the opportunity for multimodal transportation afforded to the site due to its urban location. Therefore, the proponent should be very specific on the incentive programs that would attract both casino patrons and employees to use other modes. The FEIR should clearly report on the proponent's discussions with the PVTA on plans to subsidize transit service enhancements and to provide transit incentives for employees to use the PVTA system.

The proponent has committed to hiring a full-time, dedicated Transportation Coordinator who will oversee, promote and implement the full TDM program. MassDOT recommends that the proponent develop a strong incentive program to encourage both casino patrons and employees to take advantage of the various automobile travel reduction initiatives. This should include financial incentives to encourage employees or customers to walk, bicycle, or ride public transit to the site.

The Transportation Coordinator should work closely with MassDOT and MassRides, the Commonwealth's travel options service, in order to develop the details of the TDM program and its implementation. The project proponent has consulted with MassRides during the preparation of the DEIR. The proponent has also committed to encourage ridesharing through the promotion of NuRide, the Commonwealth's web-based trip planning and ridematching service that enables participants to earn rewards for taking "green" trips. The proponent should continue its active coordination with MassRides, which is expected to play a key role on behalf of MassDOT in advising on and monitoring the implementation of the full range of TDM proposals to be undertaken by the proponent, and how the TDM program will be incorporated into the operations of the facility. The FEIR should propose a template for cataloguing, tracking, and evaluating the effectiveness of the various TDM measures during facility operations so that they can be regularly reviewed and updated as appropriate.

Transportation Monitoring Program

As part of the project mitigation program, the proponent has committed to implementing a transportation monitoring program to be initiated upon occupancy of the project. The goals of the transportation monitoring program will be to evaluate the assumptions made in the EIRs and the adequacy of the transportation mitigation measures, and to determine the effectiveness of the TDM program. The project proponent shall propose in the FEIR an appropriate timeframe for the monitoring program, or commit to initiating the monitoring program upon MassDOT's request.

Due to the size of the project, MassDOT anticipates the need to monitor and update the TDM program as necessary before the project reaches full occupancy. If the traffic monitoring program indicates that the proposed mitigation is not effective in accommodating the future traffic volumes at key area intersections impacting the state highway system, the project proponent will be responsible for identifying and implementing operational improvements at these constrained locations. MassDOT is already anticipating some fluctuations in traffic along the three bridge crossings over the Connecticut River that provide access to the site due to the project's traffic or other MassDOT planned construction projects within the study area. The monitoring program would provide the opportunity for the proponent and/or MassDOT to implement appropriate improvements or adjustments that could entail traffic signal timing and phasing modifications, optimization of the coordinated/interconnected signal system, and/or further refinement of the TDM program to reduce site trip generation.

The proponent should continue consultation with appropriate MassDOT Divisions, including the Office of Transportation Planning, the Highway Division, and the PVTa during the preparation of the FEIR for the project. If you have any questions regarding these comments, please contact me at (857) 368-8862.