



Massachusetts Gaming Commission
101 Federal Street, 12th Floor, Boston, MA 02110

Appendix C

2018 COMMUNITY MITIGATION FUND
Specific Impact Grant Application
BD-18-1068-1068C-1068L-22137

Please complete entire Application

City of Springfield

1 NAME OF MUNICIPALITY/GOVERNMENT ENTITY/DISTRICT

.
City of Springfield Office of Management & Budget

2 NAME AND TITLE OF INDIVIDUAL AUTHORIZED TO COMMIT FUNDS ON BEHALF OF
. MUNICIPALITY/GOVERNMENTAL ENTITY

Timothy Plante, Chief Administrative & Financial Officer, City of Springfield

3 ADDRESS OF INDIVIDUAL AUTHORIZED TO COMMIT FUNDS ON BEHALF OF MUNICIPALITY/
. GOVERNMENTAL ENTITY

Office of Management & Budget, Springfield City Hall, 36 Court Street, Springfield, MA 01103 for the City, the Applicant

4 PHONE # AND EMAIL ADDRESS OF INDIVIDUAL AUTHORIZED TO COMMIT FUNDS ON BEHALF OF
. MUNICIPALITY/GOVERNMENTAL ENTITY

City of Springfield: Timothy J. Plante, Chief Administrative & Financial Officer, 413-787-6215;
tplante@springfieldcityhall.com

5 NAME AND TITLE OF CONTRACT MANAGER RESPONSIBLE FOR HANDLING OF FUNDS ON BEHALF OF
. MUNICIPALITY/GOVERNMENTAL ENTITY

Timothy J. Plante, Chief Administrative & Financial Officer, City of Springfield for the Applicant

6 ADDRESS OF CONTRACT MANAGER RESPONSIBLE FOR HANDLING OF FUNDS ON BEHALF OF
. MUNICIPALITY/GOVERNMENTAL ENTITY

The Honorable Domenic J. Sarno, Mayor, City Hall, 36 Court Street, Springfield, MA 01103

Timothy J. Plante, Chief Administrative & Financial Officer, City of Springfield, City Hall, 36 Court Street,
Springfield, MA 01103

7 PHONE # AND EMAIL ADDRESS OF CONTRACT MANAGER ON BEHALF OF MUNICIPALITY/GOVERNMENTAL
. ENTITY

Timothy J. Plante, Chief Administrative & Financial Officer, City of Springfield, tplante@springfieldcityhall.com
413-787-6215

8 NAME OF GAMING LICENSEE Blue Tarp ReDevelopment, LLC

1. IMPACT DESCRIPTION

Please describe in detail the impact that is attributed to the construction of a gaming facility. Please provide support for the determination that the construction of the gaming facility caused or is causing the impact.

Prior to the legalization of casino gambling in the Commonwealth, ample on-street parking was available for businesses in the South End neighborhood of Springfield. In 2011, the State Legislature authorized resort casinos, and a casino operating license was awarded to MGM Springfield soon afterward. In 2015, groundbreaking began for an MGM Springfield casino in the South End of Springfield, directly across the street from businesses on Main Street, between State Street and Union Street. With large-scale construction still presently underway, patrons of these businesses continue to be confronted by heavy traffic congestion on a daily basis. Other routine challenges include widespread loss of on street parking, the elimination of accessible parking spaces, unplanned utility outages, and increased noise, dust, anxiety, and other difficulties that result whenever a major construction project is dropped at the center of a dense, urban neighborhood. Approximately 2,400 parking spaces have been eliminated in the south end corridor, and the project has absorbed much of the available parking within walking distance of said businesses, and has increased the price of parking in that section of the City.

The largest business in that area is Caring Health Center (CHC), a Federally Qualified Health Center (FQHC), which provides primary health care, dental services, behavioral health care, substance use treatment, WIC nutrition services, and wellness programs to more than 17,500 patients each year. CHC's central clinical and administrative facility is located at 1049 Main Street, Springfield which employees 192 individuals. Previously a commercial and retail building, the Main Street facility was acquired and extensively renovated by CHC in 2010-2014. CHC contributes approximately \$216,411.00 in property taxes to the City of Springfield. Additionally, CHC has been heralded for its commitment to Springfield's South End as the first major South End employer to rebuild in the neighborhood following the devastating 2011 tornado, a storm that destroyed the roof at 1049 Main Street. CHC received a waiver for parking requirements by the City of Springfield due to its central location, noting at the time that the majority of CHC patients either walked or took a bus to the Main Street facilities. On-street parking combined with off-street lots leased by CHC were anticipated to provide adequate parking for patients and staff; however, most of the leased patient and staff parking lots were subsequently acquired by MGM Springfield for use as construction parking lots.

As an FQHC, CHC follows a mandate to serve the residents of the local community. However, the impact of the casino construction on the South End neighborhood, and on CHC's ability to address its mandate, is enormous. For example, since the onset of construction the number of persons living in the immediate neighborhood as measured by Census Tract 8011.02 has declined 27.7%. The number of housing units has decreased 10.7%. No other census tract in Springfield has experienced this percentage of population and housing unit loss during the period. When 1049 Main Street opened, most patients walked or took the bus to reach the facility. Today, with longstanding CHC patients forced from their homes into outlying neighborhoods or other towns, fully 56.1% of the patients drive. Nearly two-thirds (63%) of

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those drivers report experiencing problems with parking and access related to casino construction.

CHC patients have no other realistic parking options. The City, as well as the Springfield Parking Authority, owns no public parking facilities in Springfield's South End. The nearest municipal parking lot is adjacent to the Springfield Public Library's main branch and is reserved for library employees and patrons. Moreover, this lot is eight blocks away. Transportation planners typically use a one-quarter mile radius as the distance people may be expected to walk for commuting. Being located one-third mile from CHC, the library lot exceeds this standard. Furthermore, to walk from the library requires a pedestrian to cross several busy, heavily traveled streets. While this situation can be expected to challenge anyone, particularly during winter months, it is impossible for patients who are ill, who have limited mobility, or who are traveling with children.

CHC has approached other property owners and businesses in the area to explore potential shared-use parking strategies. However, existing owners and businesses are understandably protective of their off-street parking resources. This effort has not been fruitful.

This request for mitigation funding addresses the daily challenges faced by patrons of the businesses in the affected area of the South End, including blocked sidewalks, traffic detours, relocated bus stops, loss of parking spaces, and congestion delays. CHC patient satisfaction surveys demonstrate the construction-related challenges to patients, including increased parking violation tickets, the difficulties in reaching the building's entrances by wheelchair, arriving for appointments as much as 30 minutes late, and missing appointments entirely due to a lack of available parking. In addition to the frustration experienced by CHC patients as they travel to the health center, the late arrival of patients triggers a "ripple effect" that negatively impacts all patients and staff.

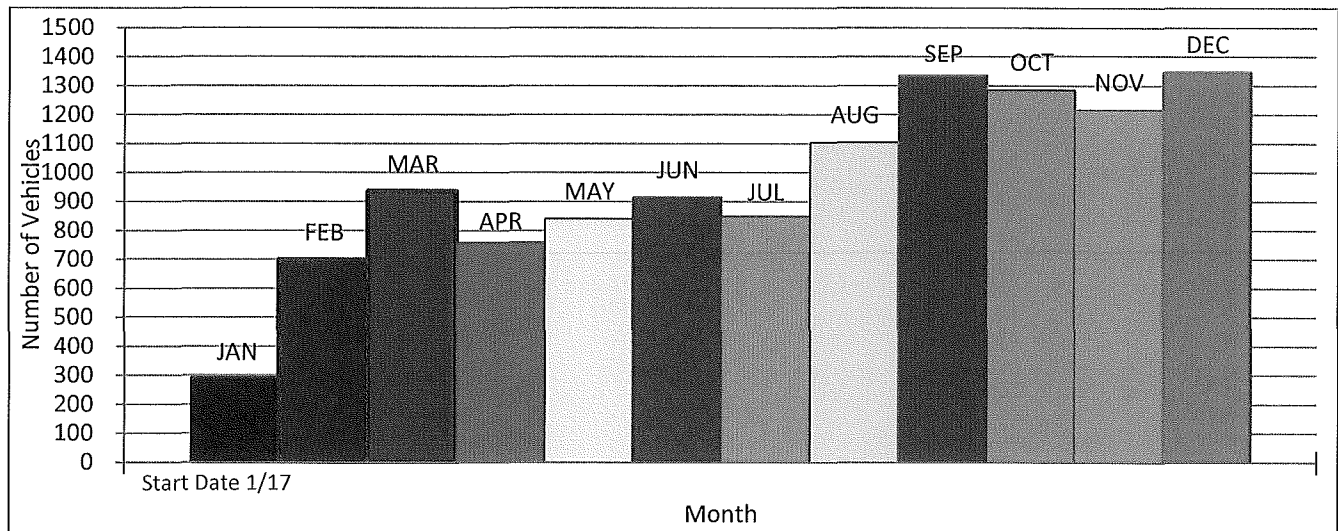
Although the Casino development opens in September of 2018, there is no express deadline for the cessation of other construction activities directly related to the development of MGM. Due to the strong likelihood of additional development activities directly correlating to the MGM development taking place after the technical opening of the Casino, it is anticipated that continued traffic congestion will be present after September of 2018. For example, MGM is currently building a daycare facility on Union Street, and the building attached to 1049 Main Street (in the rear) is developing a hotel. An additional hotel is potentially being considered between Main Street and Wilcox Street as well. As expected, the construction of a gaming facility is acting as a catalyst for additional development, which directly impacts all existing businesses and parking in the South End of Springfield. With these types of Casino-development-related construction projects continuing beyond the opening of the MGM site, adverse parking impacts in the area will not come to a complete stop in September 2018. As such, the applicant is respectfully seeking grant funds to continue operation of the valet program into early 2019, for a total of 15 months.

2. PROPOSED MITIGATION

- a) Please identify the amount of funding requested.
- b) Please identify below the manner in which the funds are proposed to be used.
- c) Please provide documentation (e.g. - invoices, proposals, estimates, etc.) adequate for the Commission to ensure that the funds will be used for the cost of mitigating the impact from the construction of a proposed gaming establishment.
- d) Please describe how the mitigation request will address the specific impact indicated. Please attach additional sheets/supplemental materials if necessary.

As a result of 2017 Specific Impact grant funds awarded to the City of Springfield on behalf of the businesses located on Main Street between State Street and Union Street, 11,729 cars were parked during the period January 1-December 31, 2017. Approximately 9% of the number of vehicles using the MGC Valet Program is nonhealth center related.

2017 MGC /City of Springfield Valet Program



Date	Valet Totals
January Total Cars	293
February Total Cars	698
March Total Cars	935
April Total Cars	759
May Total Cars	840
June Total Cars	914
July Total Cars	849
August Total Cars	1104
September Total Cars	1335
October Total Cars	1286

Approximately 9% of the number of vehicles using the MGC Valet Program is nonhealth center related.

November Current Cars	1217
December Total Cars	1348

On December 6, 2017, MassLive featured the valet parking services program. Please see article below:

Free valet parking in Springfield's South End reaches 10,000 cars outside MGM casino project

Updated Dec 6; Posted Dec 6

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By **Peter Goonan**

pgoonan@repub.com

SPRINGFIELD - A free valet parking program in the South End, launched nearly a year ago to offset challenges related to the MGM Springfield casino project, recently reached a milestone - a total of 10,000 cars aided by the service in the first 10 months.

Local officials praised the valet parking program this week and will be submitting a request to the Massachusetts Gaming Commission, seeking to extend the program and grant funds. The program has been funded by casino revenues since late January, overseen by the state commission.

"The program has been quite successful and we've seen the numbers increase pretty steadily throughout the year," said Thomas Moore, interim executive director of the Springfield Parking Authority, overseeing the program.

The free valet parking is provided directly outside the Caring Health Center at 1049 Main St., across from the MGM project, and serves surrounding businesses along the Main Street corridor in the South End.

The program was launched in mid-January.



Valet parking near casino project sees early demand

A free valet parking program in the South End of Springfield, serving to ease parking hardships near the MGM Springfield casino project, has generated interest from patrons of the Caring Health Center and others.

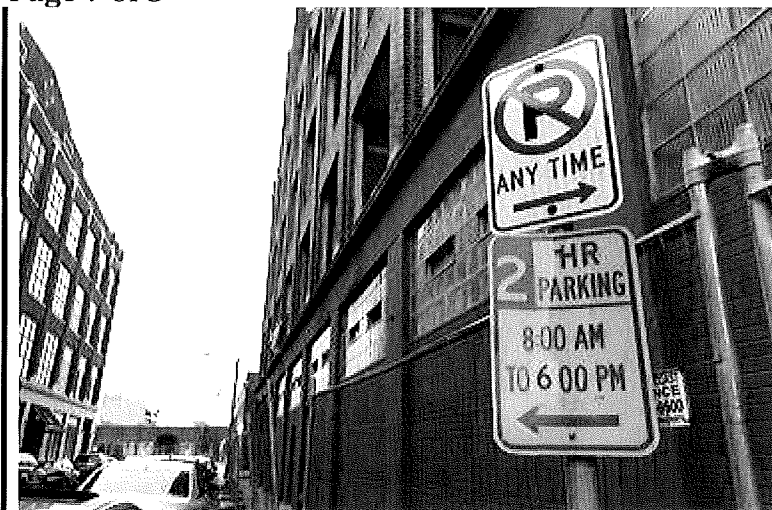
The community health center had lobbied for parking relief in early 2016, saying the MGM project had left its patients and other visitors without "visible, safe and easy parking." The center has approximately 190 employees at its Main Street site, and more than 400 patient visits daily.

Tania M. Barber, President and CEO of Caring Health Center, said she was very grateful to Mayor Domenic J. Sarno for the city's successful effort to obtain the casino mitigation funds from the Gaming Commission.

"We believe access to health care is fundamentally necessary, and we will continue to strive to make care accessible to everyone who needs it," Barber said.

The federally funded community health center provides medical, dental and behavioral health services for local and area residents, Barber said.

The Mass. Gaming Commission initially approved \$200,000 for the valet parking last January, and thereafter added \$31,523 to extend the program through Dec. 31.



The Mass. Gaming Commission granted funds this week to extend a free valet parking program in the South End to ease parking difficulties related to the MGM Springfield casino project. The funds are from casino project revenues.

Valet Park of America of Springfield was hired for the program, initially done as a 90-day pilot program and then extended. The milestone of a total of 10,000 cars using the valet service was reached by statistics extending from mid-January to mid-November.

Weekly statistics have varied, affected by holidays, snowstorms and other factors. But the increase in numbers can be seen: the highest weekly total last February was 187 cars as compared to the highest weekly total in November of 375 cars.

The city and Springfield Parking Authority are drafting a request to extend the program and funding, with the specifics still being finalized, Moore said.

There was a loss of parking in the South End related to MGM Springfield construction and the purchase of a three-block area for the \$960 million project. The casino is slated to open in September of 2018.

Moore said it the gaming commission will decide how long the valet parking is needed, with the city providing details about the performance of the program and continued demand.

Tim Graney, vice-president of operations for Valet Park of America, said the Mass. Gaming Commission "hit the nail on the head funding this community valet service."

"The number of patrons using the free service has increased every month since its inception," Graney said. "We expect it to grow exponentially during the winter months."

The free valet parking has been offered Monday through Friday during the daytime hours.

Accordingly, The City of Springfield is requesting mitigation funds for:

- Full funding and continuation of the existing, successful valet parking service

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for Main Street businesses between State and Union Streets, until the completion of the MGM Springfield project, and the restoration of adequate on street parking in the City’s South End (up to 15 months total).

- Administrative costs related to the good management of mitigation funds (an in-kind costs and matching funds).

The specific request and impacts are detailed in the first table below, and the projected costs are set forth in the second table located on page 9 of this Application.

MITIGATION FUND REQUEST	PURPOSE	IMPACTS ADDRESSED
15 month Extension of the existing Valet Parking Program for the South End of Springfield	Continuation of Valet Parking Initiative for businesses along Main Street between State and Union Streets, including for the Richard E. Neal Community Health Center Complex.	<ul style="list-style-type: none"> • Loss of on-street parking. • Loss of off-street parking lots. • Loss of parking to construction workers. • Blocked sidewalks, and the resulting lack of ADA accessibility and pedestrian safety. • Counteract real and perceptual image problems regarding lack of parking and traffic congestion.

Leading parking consultants recommend that valet parking services are the best option in situations when an enhanced level of service is required, such as with medical patients who are ill or often unable to walk any distance, or in conditions where a limited amount of less-than-desirable parking must be optimized. This is the situation facing patrons of area businesses during the casino construction activities.

Accordingly, in 2017 the City of Springfield contracted with the Springfield Parking Authority, which selected Valet Parking of America (VPA) to provide parking services for patrons of businesses in the area across from the Casino development on Main Street, following a public procurement process in accordance with Massachusetts General Laws Chapter 30B. VPA is a Springfield-based company with 25 years’ experience engaging local employees in providing valet and transport services for medical and healthcare facilities throughout New England.

VPA has projected the costs of valet parking based on expenses associated with placing two on-site valet personnel at 1049 Main Street, five days a week during regular business hours of 8:30 am until 5 pm or 7 pm (variable by day), year-round. There is a contingency for the potential need for occasional three-personnel shifts based on demand and the location of off-street parking. The VPA proposal is attached.

The continued availability of valet services will be publicized to patrons of eligible businesses (including CHC patients), to continue to counteract confusion about parking and negative information being generated about traffic congestion and parking challenges in the project area.

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Additional CHC matching funds include the costs of leasing parking spaces used by the valet service. This is being budgeted as ten spaces at \$60 per space per month. CHC seeks to provide fifteen months of parking spaces for valet services; however, this is contingent upon the continued availability and renewed leasing of the DF Main Street (Davenport), and MGM Springfield agent lots. Further, pricing could escalate if the footprint of the MGM Casino expands.

The City of Springfield and the Springfield Parking Authority will incur administrative costs related to the administration and management of the 2018 Community Mitigation funds. These costs include legal, audit, processing of requests and reporting. The value of said administrative costs is \$2,000.00 per month. Also, the City of Springfield is providing an additional contribution of the use of two on-street parking spaces at 1049 Main Street for use by the valet service, five days a week, at \$390 per month.

In summary, total in-kind contribution by the City of Springfield and Caring Health Center is valued at \$990.00 per month in matching dollars toward this request for Community Mitigation funds. Due to the opening of the MGM Casino project, and new associated business developments in the South End, continued challenges are anticipated after the completion of the casino, and as such, the City respectfully requests that the Commission consider providing impact mitigation grant funds to allow for the continuation of the valet program beyond the opening of the MGM project, into the first quarter of 2019 (up to a 15 month extension).

The proposed budget for the continuation of the valet parking initiative, as well as leveraged in-kind contributions from CHC and the City of Springfield, is shown in the table below.

	Purpose	Amount	Gaming Commission Mitigation Request	Matching Funds
VALET	Valet Parking Service (15 months at \$14235.94 per month)	\$213,539.04	\$213,539.04	
	On-street parking spaces (2) for valet (15 months at \$390 per month)	\$5,850.00		\$5,850.00
	CHC parking lot lease to be used by valet (15 months, 10 Spaces at \$60 per space per month)	\$9,000.00		\$9,000.00
	Sub-total	\$228,389.04	\$213,539.04	\$14,850.00
ADMIN	Springfield Administrative Costs (15 months at \$2,000 per month)	\$30,000.00	\$30,000.00	
TOTAL	Overall Total (with 15 month extension)	\$258,389.04	\$243,539.04	\$14,850.00

3. CONNECTION TO GAMING FACILITY

Please provide specificity/evidence that the requested funds will be used to address issue or impacts directly related to the gaming facility.

In accordance with Massachusetts Gaming Commission requirements, upon award of Community Mitigation funds, the City of Springfield will enter into an Amendment to the Memorandum of Agreement with the Springfield Parking Authority, so that the City can ensure that funding will be made only to remedy impacts and that the all applicable state and municipal laws, including but not limited to Article 46, Section 2, as amended by Article 103 of the Amendments to the Massachusetts Constitution.

4. IMPACT CONTROLS/ADMINISTRATION OF IMPACT FUNDS

Please provide detail regarding the controls that will be used to ensure that funds will only be used to address the specific impact. If non-governmental entities will receive any funds, please describe what reporting will be required and how the applicant will remedy any misuse of funds.

All Community Mitigation funds received by the City of Springfield will be managed in accordance with all applicable state and local statutes and regulations, and in accordance with the City's financial and grant management practices.

The Springfield Parking Authority is currently managing the valet program funded by Community Mitigation funds. The Springfield Parking Authority has similar fiscal controls to the City to assure proper accounting and reporting of all funds.

The fundamental purpose of Springfield's financial management plan is to ensure the appropriate, efficient, timely and honest use of funds. Specifically, Springfield ensures that:

- Internal controls for monitoring, reporting, and management are in place and adequate. Documentation is available to support accounting record entries;
- Financial reports and statements are complete, current, reviewed periodically; and
- Audits are conducted promptly and in accordance with applicable standards.

The City of Springfield has policies and administrative procedures to prevent fraud and abuse of funds and duplication of benefits. Also, the City of Springfield's Office of Internal Audit has established a 24-hour fraud hotline. The City of Springfield and the Springfield Parking Authority include contract provisions for reimbursement of funds in the case of fraud or misuse in their agreements.

CHC is a nonprofit organization incorporated under the laws of the Commonwealth of Massachusetts. CHC operates in accordance with Section 330 and is considered by the federal government a community health center which is supported by the Health Resources and Services Administration of the US Department of Health and Human Services. Furthermore, CHC receives funding from the City of Springfield and the Commonwealth of Massachusetts for health care and wellness activities. CHC is eligible to receive funds and benefits from the Commonwealth, and the purpose of this request is to address traffic congestion and the safe movement of people to access health care, which is a public purpose activity.

5. RELEVANT EXCERPTS FROM HOST OR SURROUNDING COMMUNITY AGREEMENTS

Please describe and include excerpts from any relevant sections of any Host or Surrounding Community Agreement. Please explain how this impact was either anticipated or not anticipated in that Agreement.

There is no explicit mention in either the Host Community or the Surrounding Community Agreements that address construction impact and the loss of patient parking pertaining to CHC and the other affected businesses. The Host Agreement does form a Springfield Casino Liaison Office to facilitate communication. While this is an overall positive improvement, it does not directly address the impacts borne by affect businesses others since construction has begun.

The Final Environmental Impact Report (FEIR) discusses construction mitigation and outlines parking alternatives for the displaced on-street and off-street parking in the project area. However, all alternatives identified in the FEIR are located at an unacceptable distance from 1049 Main Street and would require patients to walk at least a quarter-mile or more to park. These are not realistic options for patients who are ill, who are traveling with children, or who face mobility limitations. Although MGM intended to operate a shuttle as part of its replacement parking strategy during construction, this shuttle service has not been operational. Moreover, the shuttle is a more appropriate strategy for providing long-term parking rather than the short-term parking required for most patients.

MGM Springfield and its agents have acquired approximately 92,000 square feet of land beyond the project area for construction worker parking. The FEIR did not anticipate the impact of this extensive acquisition of off-street properties and the land area beyond the project area, and surrounding businesses have felt the impact. The increase in construction workers add to the traffic congestion around the project area, and adversely impacts the businesses in that section of the City, including CHC.

The City of Springfield is committed to working with CHC and other affected area businesses to address the construction-related impacts of casino development, and is supportive of this 2018 request for Community Mitigation Specific Impact funds.

CERTIFICATION BY MUNICIPALITY/GOVERNMENTAL ENTITY

On behalf of the aforementioned municipality/governmental entity I hereby certify that the funds that are requested in this application will be used solely for the purposes articulated in this Application.

2/1/18

Signature of Responsible Municipal
Official/Governmental Entity

Date