



**S P R I N G F I E L D
P R E S E R V A T I O N
T R U S T**
incorporated 1972

January 7, 2015

Massachusetts Gaming Commission
101 Federal Street, 23rd floor
Boston MA 02110

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

Dear Commissioners:

On behalf of the Springfield Preservation Trust (SPT), I am writing to express concern about the anticipated adverse effects of the MGM Springfield Casino project on historic buildings in Springfield, as detailed in the Massachusetts Historical Commission's letter of October 30, 2014 and discussed in a meeting on December 11, 2014.

The MGM Springfield Casino project as outlined entails the destruction or significant alteration of eight existing buildings that are listed on or eligible for listing on the State Register of Historic Places. The historic buildings and the anticipated adverse effect are summarized below.

- United Electric Company Building, (SPR.117), 73 State St. – substantial demolition
- Edisonia Theatre Block (SPR.122), 1156 Main St. – substantial demolition
- WCA Boarding House (SPR.129) 19 Bliss Street – complete demolition
- French Congregational Church (SPR.130), 33 Bliss St. – relocation
- Y.W.C.A. Building (SPR.131), 22-30 Howard St. – complete demolition
- State Armory Building (SPR.204), 29 Howard St. – substantial demolition
- Union House / Chandler Hotel (SPR.128), 1132-1142 Main St. – substantial demolition
- Howard Street Primary School (SPR.203), 59 Howard St. – complete demolition

By this letter, SPT is formally requesting Consulting Party status under 950 CMR 71.00 in order to consult with the Massachusetts Gaming Commission, the Massachusetts Historical Commission, MGM Resorts International and other project partners and explore opportunities to avoid, minimize, or mitigate the adverse effect of the project on each of these historic buildings.

SPT recognizes that the Massachusetts Gaming Commission has diligently vetted gaming companies wishing to do business in the Commonwealth and thoroughly evaluated various gaming proposals. We urge the Gaming Commission to be equally conscientious in pressing for alternatives to the demolition of historic resources in Springfield.

∞ **SPRINGFIELD PRESERVATION TRUST** ∞

74 WALNUT STREET | SPRINGFIELD, MA 01105 | (413) 747-0656 | www.springfieldpreservationtrust.org

The Springfield Preservation Trust is the primary nonprofit advocate for the preservation and adaptive reuse of historic buildings in Springfield. We agree with the assessment made by the Executive Director of the MHC at the initial consultation meeting that the current plan has been developed without much concern for historic resources. Members of the SPT board of directors attended the public roll-out of the MGM plan on August 22, 2012 and immediately informed MGM staff of the negative impact on numerous historic buildings. An e-mail was sent a few days later to outline specific buildings and offer options to avoid demolition.

At a subsequent meeting at the MGM Springfield office, SPT provided copies of the state historic inventory forms for all the affected properties. The number of buildings to be demolished had not changed when MGM made its first presentation to the Springfield Historical Commission on January 10, 2013. Nearly two years later, the number of buildings to be demolished is still the same.

The wording of 950 CMR 71.00 requires the project proponent to consider all “prudent and feasible” means to avoid, minimize or mitigate the anticipated adverse effects of a project. “Prudent and feasible” does not mean “least inconvenient and least costly.” The plans for MGM Springfield may have to be revised in order to address the adverse effects. The revisions will require creative thinking and respectful dialogue and may require skills and expertise beyond the current project team.

In the spirit of cooperation and consultation outlined under 950 CMR 71.00, the Springfield Preservation Trust has prepared initial questions and suggestions regarding alternative treatments for four of the eight buildings. Exclusion of the other four buildings from this letter does not imply support for their demolition, and our suggestions should in not be construed to be the only options to consider to avoid or minimize the adverse impacts.

United Electric Company Building (SPR.117), 73 State Street

Before alternatives to demolition can be weighed, it is important that MGM clarify inconsistencies in material provided at the December 11, 2014 meeting. The *Historic Building Map*, which is also an inset locus map on other pages, is shaded as though 55 State Street is part of the development site. The *Current Site Plan*, however, does not include 55 State Street in the development site. Which is correct?

Furthermore, city records indicate the parking lot for 73 State Street extends 140 feet along State Street as far as 55 State Street. The *Current Site Plan* does not address the area on the other side of the access driveway. What are MGM’s plans for it?

The current proposal calls for demolition of the building but retention of its façade, behind which a large hotel will be built. Elements of the ornate lobby with glass skylight will be used.

Alternative: Given there appears to be more land than previously shown, is it possible to reconfigure the hotel in so that more of 73 State Street with the ornate lobby remains *in situ*? The historic marble floor and wainscoting, the wood trim and doors, the decorative arches, the octagonal opening to a second level, the balcony railing and stairs, and the glass dome could be distinctive and attractive features of the new hotel.

Young Woman’s Christian Association (SPR.131), 22-30 Howard Street

The current proposal calls for demolition of the entire building and incorporation of some elements into the south wall of the gaming hall. The YWCA façade sits approximately 10 to 20 feet from the south wall of the gaming hall.

Alternative: The gaming hall could be extended to incorporate the YWCA façade as its south façade. The outdoor plaza between it and the State Armory would be reduced slightly, and the proposed new building along the parking garage could be reconfigured. An accessible entrance to the gaming hall could be at grade level immediately to the right of the YWCA. Perhaps the high limit gaming area could be relocated to a slightly raised area by the windows to take advantage of view to the entertainment plaza and the loggias reserved for its players.

State Armory (SPR.204), 29 Howard Street

The current proposal calls for demolition of the rear of the Armory, creation of a plaza for seasonal ice skating, and construction of retail space along Union Street.

Alternative: Rehabilitate the rear of the Armory for retail (similar to Thorne’s Market in Northampton), shift the ice rink plaza towards Union Street, and construct a smaller retail building at Union Street. Rehabilitation of the Armory could be eligible for federal and state historic tax credits.

Union House—Chandler Hotel (SPR.128), 1132-1142 Main Street

The current proposal calls for demolition of the four-story Union House except for its Main Street façade and 20 feet of its Bliss Street façade and construction of a new four-story building for a restaurant and upper floor apartments.

The historic portion of Union House (1846) is approximately 75 feet wide and 85 feet deep and does not intrude into the proposed casino space.

MGM has cited the need to construct a large basement serving uses above as one reason why Union House cannot stay. There is, however, no service basement under the proposed restaurant in the Armory or the proposed retail at 1200 Main Street. If the Mass Mutual office tower at 95 State Street is retained as MGM has mentioned publicly, there will be no large service basement under it. Why, then, is a service basement so necessary under Union House?

Alternative: Rehabilitate the Union House, which could be eligible for federal and state historic tax credits. The second floor windows should be returned to their original appearance using the historic windows on Bliss Street as a guide. The modern storefronts should be returned to the traditional 19th century configuration.

Bliss Street might become a pedestrian plaza or be treated as the former Townsley Avenue, three blocks away. The short street was closed, and a glass structure built as a connection between two State Register historic buildings. Its lower floor is a two-story pedestrian walkway bordered by the walls of the historic structures, and upper floors are offices.

Mitigation

SPT recognizes that there may not be “prudent and feasible” alternatives to demolition for every one of the eight affected buildings. In the event that the adverse effect cannot be avoided or minimized, SPT would be willing to consider mitigation efforts consistent with the physical scale and historical and architectural significance of each building. Our initial suggestions are outlined below:

- MGM could grant Preservation Restrictions in perpetuity to the Mass. Historical Commission to ensure the preservation of historic buildings within the project area.
- MGM could support the Archival Recordation of historic buildings and building features that are scheduled for demolition by providing funding for qualified consultants to research, photograph, and document the affected buildings.
- MGM could establish and capitalize a Preservation Fund to directly support the rehabilitation of vacant or deteriorated historic buildings within half a mile of the MGM development.

These comments are offered only as a starting point for consideration and discussion. We look forward to working with the Mass. Gaming Commission and the project partners to address the anticipated adverse effects and to ensure that the MGM Springfield project is a success.

Sincerely,

Donald Courtemanche
President

cc: Brana Simona, Massachusetts Historical Commission
Blue Tarp Development LLC (“MGM Springfield”)
Maureen Cavanaugh, Epsilon Associates
Laura Rome, Epsilon Associates
Lisa Kachadoorian, FEMA
MassDEP Western Regional Office
MassDOT District 2 Office
Massachusetts Department of Housing & Community Development
Deirdre Buckley, Massachusetts Environmental Policy Act (MEPA) Office
Ralph Slate, Springfield Historical Commission
Springfield Redevelopment Authority
Charles Irving, Davenport Development
James Igoe, PreservationMassachusetts
Carol Almeida, FHWA
Jaime Loichinger, Advisory Council on Historic Preservation