



Massachusetts Gaming Commission
RFA-2 Application Review
Category 1 License for Casino: Region A

Report to the Commissioners for: Category # 5 - Mitigation

**Commissioner Gayle Cameron
September 9, 2014**

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1. Introduction

The questions and responses included in the Mitigation Category 5 portion of the RFA-2 application were sorted into groups that addressed similar issues for the purpose of a comprehensive evaluation. The groups identified are outlined below as Criteria 1 through 4, consisting of: Community Support, Traffic and Offsite Impacts, Measures to Promote Responsible Gaming and Address Problem Gambling, and Promote and Enhance the Lottery.

Criteria

Category 5 is comprised of 4 Criteria:

- Criterion 1 (Questions 5-3 to 5-21): **Community Support**
- Criterion 2 (Questions 5-1, 5-2 to 5-33 to 5-38): **Traffic and Offsite Impacts**
- Criterion 3 (Questions 5-23 to 5-32): **Measures to Promote Responsible Gaming and Address Problem Gambling**
- Criterion 4 (Questions 5-22): **Protect and Enhance Lottery**

Rating System

Color coding and rating explanation

INSUFFICIENT	Failed to present a clear plan to address the topic, or failed to meet the minimum acceptable criteria of the Commission.
SUFFICIENT	Comprehensible and met the minimum acceptable criteria of the Commission, and/or provided the required or requested information.
VERY GOOD	Comprehensive, demonstrates credible experience and plans, and /or excels in some areas.
OUTSTANDING	Uniformly high quality, and demonstrates convincing experience, creative thinking, innovative plans and a substantially unique approach.

Question List

- 5-1 Infrastructure Costs
- 5-2 Impacts and Costs
- 5-3 Community Impact Fee
- 5-4 Host Community Agreements
- 5-5 Election Materials
- 5-6 Mitigation
- 5-7 Election Related Advertising
- 5-8 Negative Advertising
- 5-9 Contributions
- 5-10 Request for Contribution
- 5-11 Public Outreach
- 5-12 Public Support
- 5-13 Non Profit and Community Partnerships
- 5-14 Executed Surrounding Community Agreements
- 5-15 Designation of Surrounding Community w/o Executed Agreement
- 5-16 Declined Communities
- 5-17 Mitigation
- 5-18 Executed Live Entertainment Venue Agreements (ILEV)
- 5-19 Declined ILEV Agreements
- 5-20 Cross Marketing Agreements
- 5-21 Exclusivity with Entertainers
- 5-22 Protect and Enhance the Lottery
- 5-23 On Site Resources for Problem Gambling
- 5-24 Problem Gambling Signage
- 5-25 Self Exclusion Policies
- 5-26 Identification of Problem Gambling
- 5-27 Credit Extension Abuse
- 5-28 Code of Ethics
- 5-29 Metrics for Problem Gambling
- 5-30 Advertising Responsible Gambling
- 5-31 Treatment and Prevention
- 5-32 Historical Efforts Against Problem Gambling
- 5-33 Traffic Control Measures
- 5-34 Traffic for Special Events
- 5-35 Snow Removal
- 5-36 Housing
- 5-37 School Population
- 5-38 Emergency Services Available

2. Overall Rating, Category 5, Mitigation

<p>Introduction</p> <p>The RFA-2 review process consisted of: a review of the Category 1 application, Applicant’s presentations to the Massachusetts Gaming Commission (MGC), environmental documents, public comment letters received through MGC, and site visits by subject matter experts and commissioners.</p> <p>The review group consisted of the following: MGC staff: Mark Vander Linden, Director of Research and Problem Gambling; independent reviewers and gaming consultants from GMC Strategies, City Point Partners, Green International, and Problem Gaming Solutions; and the Coordinator – Pinck & Co., Inc.</p>	
VG	<p>Mohegan Sun Revere</p> <p>Mohegan Sun Massachusetts (MSM) has taken a serious, proactive approach with extensive public outreach and solicitation of community support. The Applicant had a short time in which to introduce itself to the citizens and the surrounding communities; it has done so vigorously with help from Sterling Suffolk Racecourse where the casino will be located. The Applicant succeeded in two Host Community referenda in Revere; though there was significant opposition to the Applicant’s proposed project and site relocation from East Boston residents. The Applicant has reached agreements with all surrounding communities and has offered generous annual payments in each case.</p> <p>The Applicant has committed to constructing transportation improvements at numerous locations to mitigate their offsite impacts, encourage alternate modes of transportation, and improve deficiencies in the existing transportation system. The mitigation proposed adequately addresses proposed impacts. MSM provided comprehensive responses and analysis of the potential impacts to housing, schools, and emergency services, and has committed the appropriate levels of mitigation to address impacts</p> <p>MSM has made a commitment to address problem gambling and promote responsible gaming in their Responsible Gaming Plan. The Applicant has a demonstrated history of addressing responsible gaming and supporting problem gambling research and awareness. MSM has confirmed their understanding of the complexity of problem gaming and proposes an adequate mitigation plan.</p> <p>The Applicant has executed a formal agreement with the MA State Lottery Commission. Lottery officials confirmed that they appreciated the Applicant’s attention to this matter.</p>
S	<p>Wynn Everett</p> <p>Wynn conducted a comprehensive outreach effort to the host community and received the highest percentage vote of any Host Community referendum in the Commonwealth. Wynn partnered with a range of local, regional community and non-profit organizations and reached Surrounding Community Agreements (SCA) with all communities except Boston. In cases where there were unlikely to be direct impacts, Wynn entered into nearby community agreements.</p> <p>Wynn has committed to the design and construction of transportation improvements at various locations; most of the proposed measures will mitigate their traffic-related impacts, improve existing deficiencies in the transportation system, and encourage the use of alternate modes of transportation. The proposed mitigation at Sullivan Square is inadequate and incomplete, because the proposed improvements do not fully mitigate the additional traffic. The Applicant provided minimal information on impacts to housing and school populations.</p> <p>Wynn has agreed to comply with the MGC regulations under development and industry standards for responsible gaming, and problem gambling; but there was no evidence of a commitment to exceed those standards. The Applicant has expressed a clear intention to assist the MGC with establishing regulations and policies in the areas of problem gambling and responsible gaming.</p> <p>The Applicant is actively negotiating, but has not yet executed a formal agreement with the MA State Lottery Commission. Lottery officials confirmed that they have met with Wynn representatives and expect that an agreement can be completed.</p>
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3. Criteria Rating Summary

	Mohegan Sun Revere	Wynn Everett
1. Community Support	<p>Sufficient</p> <p>MSM has taken a serious, proactive approach to community outreach. While the applicant had a short time in which to introduce itself to the citizens and the surrounding communities, it has done so vigorously with the help of Sterling Suffolk Racecourse as a longtime employer and presence in the community. MSM reached agreements with all of its surrounding communities and has received strong support from its Host Community. The applicant received two favorable votes from its Host Community. But the applicant has also received significant opposition from East Boston and elsewhere, particularly related to the move to Revere after the failed November referendum in East Boston. Some opposition has been voiced focused mostly on concerns with gambling as an activity and industry.</p>	<p>Sufficient</p> <p>Wynn conducted a comprehensive outreach effort in the Host Community that resulted in the highest percentage vote at any Host Community election in the Commonwealth. Wynn partnered with a number of community and non-profit organizations and reached Surrounding Community Agreements (SCA) in all cases except Boston. Two negotiations lead to arbitration and Wynn’s proposals were selected in both cases. Wynn was unable to negotiate a Surrounding Community Agreement with Boston and Boston declined to participate in the arbitration process. In cases where there were unlikely to be direct impacts, Wynn entered into nearby community agreements. Nearby neighborhoods and some communities have expressed opposition to the proposed project, citing transportation and other potential negative impacts.</p>
2. Traffic and Offsite Impacts	<p>Sufficient</p> <p>MSM has committed to constructing transportation improvements at various locations in Revere, Boston, and Chelsea to mitigate their off-site impacts, encourage alternate modes of transportation, and improve deficiencies in the existing transportation system. The proposed transportation-related improvements adequately address projected impacts. The applicant provided a comprehensive study demonstrating no impacts to housing and school populations. MGC’s consultant analysis found that there is unlikely to be significant adverse impacts to housing in the area.</p>	<p>Insufficient</p> <p>Wynn has committed to constructing transportation improvements at various locations in Everett, Medford, Boston, Revere, and Chelsea. Most of the proposed improvements will mitigate their traffic-related impacts, improve existing deficiencies in the transportation system, and encourage the use of alternate modes of transportation. However, the short-term improvements proposed in Sullivan Square are inadequate, and the Applicant has not committed to participate in a long-term solution. Applicant provided minimal information on impacts to housing and school populations. MGC’s consultant analysis found that there is unlikely to be significant adverse impacts to housing in the area.</p>

<p>3. Implement Measures to Promote Responsible Gaming (RG) and Address Problem Gambling</p>	<p style="text-align: center;">Very Good</p> <p>MSM outlined a clear commitment to address problem gambling and promote responsible gaming. The Applicant proposed many creative strategies in their operations including signage, code of conduct, staff training, and collaborative efforts with outside organizations. Overall, MSM demonstrated a solid understanding of the complexity of problem gambling, and proposes an aggressive mitigation plan.</p>	<p style="text-align: center;">Sufficient</p> <p>Generally, Wynn’s response to questions about measures to promote responsible gaming and address problem gambling lacked depth and detail. Based on the applicant’s responses, it was evident they would comply with MGC regulation and otherwise follow standard industry practice in areas of promoting responsible gaming and addressing problem gambling at their property. There was no evidence of a commitment to exceed those standards. Wynn expressed a clear intention to assist MGC in establishing policies and regulations for problem gambling and responsible gaming.</p>
<p>4. Protect and Enhance Lottery</p>	<p style="text-align: center;">Sufficient</p> <p>MSM has executed a Sales Agent Agreement with the Massachusetts State Lottery Commission and has committed to installing terminals to promote the Lottery. Lottery officials confirmed a productive working relationship the Applicant.</p>	<p style="text-align: center;">Sufficient</p> <p>Wynn is actively negotiating a Sales Agent Agreement with the Massachusetts State Lottery Commission. Lottery officials confirmed they have met with Wynn representatives and expect that an agreement can be completed.</p>

4. Review Detail

Criterion 1: Community Support

Host Community Agreement
 Surrounding Community Agreements
 Impacted Live Entertainment Venues

The evaluation of this criterion focused on the overall local and regional support the Applicant’s proposed project has received during the application and review process. How communities view these proposed projects is an important element in Category 1 reviews. These are going to be new facilities and a new industry for the community and its neighbors, and how these developments are perceived by residents, elected officials, and local businesses must be closely considered. Evaluation of Community Support included an assessment of the process and outcomes undertaken in negotiating and securing both agreements with the Host Communities as well as their outreach, negotiation and agreements with their surrounding communities and regional entertainment venues. This evaluation recognized that the Host Community Agreement and Surrounding Community Agreement requirements of the Mass. Gaming law are the first of their kind in the country and thus a new process for each these applicants to undertake. In addition to the information submitted in the original applications and subsequent community negotiations, evaluation also included an assessment of the community support and opposition to each proposed project that was displayed in public hearings in the host and surrounding communities.

GROUPING OF QUESTIONS BY SIMILARITY		
Group 1 – Content of Agreements (Host Community)	5-3 Community Impact Fee 5-4 Host Community Agreements 5-6 Mitigation	All questions relate to the applicants negotiated Host Community Agreements and their commitments to address all impacts.
Group 1 Rating	Mohegan Sun Revere	Wynn Everett
	Very Good	Very Good
	Both applicants reached Host Community Agreements that were approved by wide margins in local referendum votes. The agreements vary slightly in the form in which they meet tax obligations and community impact fees, but are consistent in the overall financial contributions to the Host Communities. Both applicants also provide up-front payments to their Host Communities.	
Group 2 – Host Community Agreement Election-related Information	5-05 Host Community Agreements – Election Materials 5-07 Election Related Advertising 5-08 Negative Advertising 5-09 Contributions 5-10 Request for Contribution	These questions requested submission of factual information related to the election.
Group 2 Rating	Mohegan Sun Revere	Wynn Everett
	Sufficient	Sufficient

	Both applicants provided the required information and documentation in response to these questions.	
Group 3 – Public Support and Outreach	5-11 Public Outreach 5-12 Public Support	These questions relate to the applicants’ connection to and support from both their Host Community and surrounding communities. Evaluation of these questions incorporate the public input from the public hearings held in the surrounding and Host Communities.
Group 3 Rating	Mohegan Sun Revere	Wynn Everett
	Sufficient	Sufficient
	Both applicants had a high level of public support in public hearings and written statements and responses. The jobs, investment and community revitalization that both applicants offer was strongly supported. MSM benefited from strong support for the preservation of jobs and ancillary activity from the Suffolk Downs Racecourse. The Wynn application was supported for its job creation and environmental/community revitalization elements. Both applicants received opposition from local and regional communities. Much of the opposition was to gambling itself and not to specific elements of either applicant’s proposed project. However many comments from surrounding communities addressed significant and not fully addressed concerns with traffic and societal impacts on nearby neighborhoods.	
Group 4 –Surrounding Communities	5-14 Executed Surrounding Community Agreements 5-15 Designation of Surrounding Community w/o Executed Agreement 5-16 Declined Communities 5-17 Mitigation	All questions relate to the applicants’ approach to identifying and negotiating with surrounding communities, a key element of the gaming legislation and the application process.
Group 4 Rating	Mohegan Sun Revere	Wynn Everett
	Sufficient	Sufficient
	Both applicants have negotiated Surrounding Community Agreements and made mitigation commitments to surrounding communities. Wynn entered into and completed arbitrations with two (2) surrounding communities resulting in Surrounding Community Agreements. Wynn has been unable to negotiate a Surrounding Community Agreement with the City of Boston. Boston has declined to participate in the arbitration process with Wynn. MSM had no arbitrations. Arbitrations should not reflect poorly on an applicant as a number of factors on both sides may contribute to the need for arbitration. Specific details and financial commitments on issues such as traffic mitigation are still undetermined for Wynn. The final amount and scope of traffic mitigation for MSM is still pending selection of alternatives from state agencies	
Group 5 – Regional Venues	5-13 Non Profit and Community Partnerships 5-18 Executed Live Entertainment Venue Agreements 5-19 Declined ILEV Agreements 5-20 Cross Marketing Agreements 5-21 Exclusivity with Entertainers	All questions relate to the applicants addressing concerns of nearby entertainment venues or other regional attractions.

Group 5 Rating	Mohegan Sun Revere	Wynn Everett
	Sufficient	Sufficient
	<p>Both applicants have actively supported non-profit and community organizations in their Host Communities and in the surrounding region. Neither applicant's plans include a live entertainment venue of over 1,000 seats and thus will not compete with regional entertainment venues. Both applicants have entered into agreements with the Massachusetts Performing Arts Coalition (MPAC) for promotional and collaborative activities. MSM has a collaboration and consulting agreement with the Citi Center for the Performing Arts to manage the applicant's entertainment activities and work with local venues.</p>	

*These questions derive from the gaming regulations, G.L. c. 23K are specifically called out in §18 (8) as objectives each Applicant proposes to advance, and that the Commission shall evaluate and issue a statement of findings.

5-03 Community Impact Fee - Describe and identify the applicable section of the executed host community agreement, between the applicant and the host community, for the payment of a community impact fee including the timing as to when the fee will be paid in the event that the applicant is awarded a gaming license.		
Overall Comments on all Applications	Both applicants propose to use a mechanism known as a 121A Agreement to address their property tax obligations. Chapter 121 A refers to a state program allowing municipalities and developers to enter into agreements that set specific, predictable tax payments for a period of years that are not subject to changes from valuation or tax rates.	
	Mohegan Sun Revere	Wynn Everett
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • One-time \$33M in initial payments over the first 4 years; • Beginning in 2018, Pre-Payments of Community Impact fee of \$9 million annually until opening. • Upon casino opening, \$25M annual fee with escalators to \$28M in years 4-6, then \$30M in Year 7 and thereafter or a % of GGR, whichever is higher; • Community Impact Fee is inclusive of tax payments made under 121A Agreement. 	<ul style="list-style-type: none"> • One-time \$30M Community Enhancement Fee advance payment during construction. • \$20M in Payment In Lieu of Tax (PILOT) (increasing by 2.5%) made under 121 Agreement. • \$5M Community Impact Fee, increasing 2.5% annually.

5-04 Host Community Agreements - Attach all host community agreements, including any appendices or attachments, into which the applicant has entered.		
Overall Comments on all Applications		
	Mohegan Sun Revere	Wynn Everett
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • Applicant negotiated HCA in a timely fashion and referendum approved by ballot measure in February 2014 by a vote of 63% to 37%. 	<ul style="list-style-type: none"> • Applicant negotiated HCA in a timely fashion and referendum was approved by ballot measure in July 2013 by a vote of 86% to 14%.

5-05 Host Community Agreements – Election Materials - Provide the summary of the host community agreement that was provided to the voters along with a description of the election at which the project was approved of by the voters, including the date of the election, the polling procedures, and a certified copy of the election results provided by the city or town clerk.		
Overall Comments on all Applications		
	Mohegan Sun Revere	Wynn Everett
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> Applicant provided in its 12/31/13 application information on its waiver request for a February Revere vote on its project and provided information on the original Revere vote in November 2013. Subsequent to the February vote, on March 20, 2014 Applicant provided the necessary materials and information related to HCA election. Information provided included a description of the special election process, polling times, and ward and precinct results. 	<ul style="list-style-type: none"> Applicant provided the necessary materials and information related to HCA election including the Summary of the Host Community Agreement provided to voters, full election results by Ward and Precinct and a map of all Everett’s Wards and Precincts.

5-06 Mitigation – Describe how the applicant proposes to address host community impact and mitigation issues as set forth in the host community agreement during both the construction and operation of the proposed gaming establishment.		
Overall Comments on all Applications		
	Mohegan Sun Revere	Wynn Everett
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> Total off-site infrastructure estimated costs at \$55.5 million: <ul style="list-style-type: none"> \$46.5 million in transportation infrastructure costs \$9 million in utility infrastructure costs Minimum \$25 million annual Community Impact Fee to the City of Revere. This may increase over time based on the Gross Gaming Revenue for each year. Applicant included information and maps on both on-site and off-site improvement plans. Applicant included detailed construction management plan with mitigation plans. Applicant has continued to communicate with MassDOT and other agencies to address infrastructure priorities and concerns. The off-site Host Community mitigation includes: <ul style="list-style-type: none"> Route 1A infrastructure improvements Route 1/Route 16 intersection Route 16 / Revere Beach Parkway / Harris Street intersection Donnelly Square 	<ul style="list-style-type: none"> Off-site infrastructure improvements estimated at = \$62 million: <ul style="list-style-type: none"> \$42 million in transportation infrastructure cost \$20 million in intermodal transportation improvements Additional \$30 million “Community Enhancement Fee” to the City of Everett over the period of 3 years which will be used for capital improvement projects by the City. Annual \$5 million Community Impact fee to the City of Everett which grows 2.5% annually. The Applicant agrees to be responsible for all of the Project’s known transportation infrastructure impacts, including impacts from the on-going operation of the proposed gaming facility and any temporary impacts during construction. Applicant commits to environmental remediation of site prior to construction; and to improve waterfront access for the community. Applicant committed to releasing detailed traffic management and improvement plans but has not provided detail. The off-site mitigation includes:

	<ul style="list-style-type: none"> - North Shore Rd / Revere Beach Pkwy / Tomasello Dr intersection - Bell Circle - Brown Circle - Revere Street at Route 60 and at Route 1A - Copeland Circle - Streetscape improvements in the Beachmont Neighborhood in the City of Revere - Route 1A planning in Revere - Copeland Circle Planning - Route 60 Planning - All of the above at an estimated cost of \$45 million from the Supplemental Draft Environmental Impact Report (SDEIR) - Beachmont MBTA station improvements = \$1,500,000 • Applicant has committed to the following infrastructure improvements, but has not yet estimated associated costs: <ul style="list-style-type: none"> - Furlong Drive improvements - Transportation Demand Management program - Electrical service upgrades • No infrastructure costs will be incurred by the Host community for either construction or operation of the gaming establishment. • Costs identified above are separate from the \$6 million initial payment and \$9 million annual payments (until opening) to Revere. 	<ul style="list-style-type: none"> - Santilli Circle - Sweetser Circle - Lower Broadway (Route 99) corridor - Broadway / Norwood Street / Chelsea Street - Lower Broadway Truck Route, including the reconstruction of Robin Street and Dexter Street - Broadway / Ferry Street
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<p>5-07 Election Related Advertising – Attach a copy of all M22 forms filed in accordance with G.L c.55, §22 relative to expenditures made by the applicant with intent to influence the outcome of the host community ballot question and/or the M101 BQ and M102 forms filed relative to the forming and funding by the applicant of a host community related ballot question committee as prescribed by the Office of Campaign and Political Finance. (Please provide these items as attachments 0-00-01 <i>et seq.</i>) State the total amount of money the applicant spent on advertising or organizing for a favorable election outcome.</p>		
Overall Comments on all Applications	Both applicants satisfied this requirement by completing appropriate forms.	
	Mohegan Sun Revere	Wynn Everett
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> Necessary forms are provided in the attachments. Applicant met this requirement. M22 Forms were provided for landlord Sterling Suffolk Racecourse LLC for its expenditures in support of the November 2013 ballot question. 	<ul style="list-style-type: none"> Necessary forms are provided in the attachments. Applicant met this requirement and provided the Office of Campaign and Political Finance forms for Wynn and for Everett United, detailing receipts and expenditures.

<p>5-08 Negative Advertising – Since November 22, 2011, has the applicant, any person or entity with a financial interest in the applicant, anyone acting at the direction or request of the applicant or anyone acting at the direction or request of a person or entity with a financial interest in the applicant made any monetary or in-kind contribution, directly or through an intermediary, to any entity, group or person who was urging voters to cast a negative vote in any election governed by G.L. c. 23K, §15(13)? If yes, please use attachment “0-00-01 Contributions” to state the name of the donor, the date of the monetary or in-kind contribution, the amount or nature of the contribution and the name and address of the recipient of the contribution.</p>		
Overall Comments on all Applications	Both applicants answered the question by indicating that no money was spent on negative advertising.	
	Mohegan Sun Revere	Wynn Everett
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> Applicant indicates that no money was spent on negative advertising. 	<ul style="list-style-type: none"> Applicant indicates that no money was spent on negative advertising.

5-09 Contributions – Attach a copy of all Form M119 prescribed by the [Office of Campaign and Political Finance](#) that have been filed by the applicant in accordance with G.L. c.23K, §47. Further, in accordance with 205 CMR 108.02, disclose all political contributions, community contributions, or contributions in kind made by an applicant or qualifier to a municipality or a municipal employee of the host community from January 15, 2013 through the date of submission of this application. (Please provide these items as attachments 0-00-01 *et seq.*)

Overall Comments on all Applications	Both applicants satisfied requirements.	
	Mohegan Sun Revere	Wynn Everett
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> Applicant states that it made no corresponding political contributions. Applicant states that its partner and landlord Sterling Suffolk Racecourse LLC paid \$227,792.95 to the City of Revere or its agents and \$450,000 to the City of Boston or its agents for a combined total of \$677,792.95 for expenses incurred in connection with reviewing the impacts of the former Suffolk Downs proposed project. Applicant included M119 forms filed by Sterling Suffolk Racecourse LLC. 	<ul style="list-style-type: none"> Applicant responded N/A to this question, indicating that no corresponding political or community contributions were made by the Applicant.

5-10 Request for Contribution – Subject to the exemptions identified in 205 CMR 108.03(4), identify all requests of which the applicant is aware for any thing of substantial value, as defined by 205 CMR 108.03(1), made to an agent or employee of the applicant or any qualifier by persons or persons listed in 205 CMR 108.01(1) from January 15, 2013 through the date this application is filed. Each request identified shall include the name of the person who made the request, the date the request was made, and the nature of the request. (Note- the Commission is only interested in requests that are related in some fashion to the Massachusetts project, be it the nature of the request or the individual making the request. The Commission is not seeking disclosure of requests solely related to the applicant’s business in other states or internationally. For example, a request received by the applicant to sponsor a youth sports team in Massachusetts should be disclosed. However, a similar request by an individual unconnected to Massachusetts to sponsor a youth sports team in Nevada need not be disclosed.)

Overall Comments on all Applications		
	Mohegan Sun Revere	Wynn Everett
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> Applicant replied N/A, indicating there were no requested contributions. 	<ul style="list-style-type: none"> Applicant provided attachment as required. Applicant lists 22 requests for contributions during calendar year 2013. Requests range from \$270 to support an annual fundraising dinner to \$50,000 to fund a water transportation study.

5-11 Public Outreach – Provide a description and documentation for all public outreach efforts that the applicant has made to local communities.		
Overall Comments on all Applications		
	Mohegan Sun Revere	Wynn Everett
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • Together, the Applicant and its landlord/partner Sterling Suffolk Racecourse LLC have made strong efforts over many months conducting public outreach to local communities, including the host community; • Prior to the application submittal, the landlord/partner worked for many months to build community support for a casino development and has many close ties with community and non-profit groups. • Since the application submittal, MSM has developed close ties to the community and received vocal support from local businesses, unions and other organizations. • Applicant has continued to expand its Business Partnership Program in the months since application submittal, adding several hundred businesses to the program. • Applicant has also entered into MOUs with local and regional tourism bureaus. 	<ul style="list-style-type: none"> • Applicant held dozens of public information sessions in Everett, North End, Charlestown, Medford, Cambridge and elsewhere; Events and information sessions were highly publicized to maximize attendance and awareness of the project. • Applicant met with dozens of community groups, chambers of commerce in addition to meetings with individual businesses and citizens. • Application response lists 33 specific public outreach meetings between December 2012 and December 2013 in the Host and surrounding communities hosted by either Wynn or the City of Everett, in addition to attendance at other community meetings and information sessions. • Applicant sent direct mail letters and informational DVDs to all registered voters' households and posted print advertisements in local publications.

5-12 Public Support – Describe in detail the public support for the project the applicant has obtained in the host and surrounding communities in addition to that reflected by the host community vote, including the names and affiliations of all individuals, including elected officials, organizations and groups that have given public support to the project, and describe any agreement relationships with local organizations.		
Overall Comments on all Applications	MSM had a short period of time to introduce the project, educate residents and gain support; Wynn announced its project and location many months earlier and spent considerable time and effort with outreach and seeking support.	
	Mohegan Sun Revere	Wynn Everett
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • Host Community Agreement passed with 63% of vote February 24, 2014 • Host Community Hearing demonstrated strong support. • Received support and endorsements from several surrounding community leaders and dozens of businesses and community leaders in short timeframe before application submittal. • Surrounding community hearing demonstrated support and opposition, much of it from East Boston and Winthrop. East Boston residents have been vocal in their opposition to the waiver granted to MSM to relocate its planned project to Revere exclusively. • Host Community hearing produced strong local community support; opponents to casino gambling were also represented at the hearing. • Winthrop signed a Surrounding Community Agreement with MSM and several town officials spoke in favor of MSM at recent hearings in the Host Community, indicating that they have no issues at this time. 	<ul style="list-style-type: none"> • Host Community Agreement passed with 86% of the vote June 22, 2013. • Surrounding community hearing demonstrated support and some opposition, much of it from Charlestown. • Host Community hearing generated strong local community support and some opposition to the project and casino gambling from neighboring communities. • City of Somerville notified the MGC that despite its Surrounding Community Agreement, it does not support the applicant’s project. • Wynn was not able to negotiate a SCA with City of Boston and the City declined to participate in arbitration to select a Best and Final Offer (BAFO) for mitigation of impacts.

5-13 Non Profit and Community Partnerships – Describe and provide evidence of partnerships with or other support for non-profit and community groups in the host community.		
Overall Comments on all Applications	Non-profit and community partnerships are an important element of increasing the benefits of these projects outside of the property’s boundaries; applicants in other regions and categories set a standard for non-profit and community partnerships that was not matched by these applicants.	
	Mohegan Sun Revere	Wynn Everett
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • Despite limited time to generate community partnerships, prior to application submittal, the Applicant has developed close ties to non-profit and community groups. • Over the months since submittal, Applicant has continued to build on those partnerships and sponsorships, creating Memoranda of Understanding (MOU) and support for local and regional groups. • The Applicant’s landlord Suffolk Downs Racecourse has been a longtime supporter of many organizations and local groups and has strong ties throughout the region. • Applicant created a program to allow casino customers to donate to local charities. 	<ul style="list-style-type: none"> • Applicant currently supports local and regional organizations through donations and membership • Application lists 8 organizations supporting the project • Modest support and list of partnerships relative to other RFA-2 applicants elsewhere. • Since the application filing, Applicant has met with 29 organizations around the region and the state and developed agreements with many of them. None appear to be in the host community.
Existing and past practices supporting commitments	More detail on activities since application—vendor fairs, new partnerships with businesses in Momentum programs, etc noted during Host Community hearings.	

5-14 Executed Surrounding Community Agreements – Provide a copy of all executed surrounding community (SC) agreements.		
Overall Comments on all Applications	The process of negotiating with surrounding communities is a new one for all applicants and for communities. Both applicants were able to reach agreements with many communities, and one applicant ended up in binding arbitration with others.	
	Mohegan Sun Revere	Wynn Everett
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • Only Draft SCA with Chelsea in the RFA-2 Application. • SCAs since the RFA-2 with Chelsea, Cambridge, Medford, Melrose, Salem, Malden, Lynn, Saugus, Everett, Winthrop, Somerville, and Boston. • No SCA negotiations were required to enter arbitration. 	<ul style="list-style-type: none"> • Applicant included an SCA with the City of Malden in RFA-2 application. • SCAs since RFA-2 with Medford and Cambridge and nearby community agreements with Lynn and Melrose. • Two SCA negotiations with Chelsea and Somerville went to arbitration with the Applicant’s Best and Final Offer (BAFO) selected both. Boston declined to participate in arbitration with Wynn to develop a BAFO for mitigation of impacts.

<p>5-15 Designation of Surrounding Community w/o Executed Agreement – List all municipalities that the applicant wishes to designate as a surrounding community in accordance with 205 CMR 125.01(1)(a) with which no surrounding community agreement has been executed as of the time of the filing of this application. Please briefly describe the nature of the discussions with any identified community. Please attach the notice of such designation that was provided to the chief executive officer of the community in accordance with 205 CMR 125.01(1)(a).</p>		
Overall Comments on all Applications		
	Mohegan Sun Revere	Wynn Everett
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> Applicant designated Boston, Winthrop, and Chelsea. Applicant included a draft SCA with Chelsea. 	<ul style="list-style-type: none"> Applicant acknowledged Boston and Medford as surrounding communities in RFA-2 Application. Applicant listed Somerville, Chelsea, and Revere not as designated communities but as communities with which outreach had begun and negotiations attempted without progress. Since the application submittal, Applicant has completed arbitration with Somerville and Chelsea. Revere did not pursue surrounding community designation.

<p>5-16 Declined Communities – Identify any community that requested a surrounding community agreement or sought to discuss its status as a prospective surrounding community, which the applicant declined. Please explain the reasons for declining and describe the nature of the discussions or negotiations the applicant had with the community.</p>		
Overall Comments on all Applications		
	Mohegan Sun Revere	Wynn Everett
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none"> Somerville is listed as a Declined Community with an explanation that the city leaders' opposition to resort gaming made outreach and communication as a surrounding community difficult; Wynn and Somerville completed Arbitration, with Wynn's BAFO being selected.

5-17 Mitigation – Describe how the applicant proposes to address surrounding community impact and mitigation issues as set forth in the surrounding community agreements during both the construction and operation of the proposed gaming establishment.		
Overall Comments on all Applications	In their RFA-2 application and in subsequent Surrounding Community Agreements, each applicant made a range of financial commitments in the form of funds for studies, direct grants to communities to alleviate traffic impacts, and commitments to fund certain large scale improvements to address major mitigation concerns. In some cases, the actual dollar commitments are not completely clear or are not certain to be sufficient to fund the identified improvements.	
	Mohegan Sun Revere	Wynn Everett
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • \$450K to fund study of Wellington Circle. • Offers communities annual payments of \$600K to \$2.5M to address any impacts from the gaming facility and will work cooperatively with communities to address all known impacts. • Additional detailed commitments included in Question 5-06. 	<ul style="list-style-type: none"> • Up to \$1.5M to fund study of Wellington Circle. • Community payments ranging from \$50K to \$1M to address traffic and infrastructure impacts. • Commitment to fund up to \$6M in immediate improvements to Sullivan Square. • Additional detailed commitments included in Question 5-06.

5-18 Executed Live Entertainment Venue (ILEV) Agreements – Provide a copy of all impacted live entertainment venue agreements executed in accordance with 205 CMR 126.01(1)(a).		
Overall Comments on all Applications		
	Mohegan Sun Revere	Wynn Everett
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • Agreement with Citi Performing Arts Center to be an off-site venue and to manage MSM’s onsite venue and provide education and community outreach. 	<ul style="list-style-type: none"> • None in RFA-2 Application. • ILEV Agreement executed with Mass. Performing Arts Coalition 1/30/14, that commits to an on-site venue not to exceed 1,000 seats.

5-19 Declined ILEV Agreements – Identify any venue that requested an impacted live entertainment venue agreement or sought to discuss its status as a prospective impacted live entertainment venue, which the applicant declined. Please explain the reasons for declining and describe the nature of the discussions or negotiations the applicant had with the venue.		
Overall Comments on all Applications		
	Mohegan Sun Revere	Wynn Everett
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • None. 	<ul style="list-style-type: none"> • None.

5-20 Cross Marketing Agreements – List all cross-marketing agreements with impacted live entertainment venues the applicant has entered. If more space is needed, please use an attachment.		
Overall Comments on all Applications		
	Mohegan Sun Revere	Wynn Everett
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • Same Entertainment Services Agreement with Citi Performing Arts Center. 	<ul style="list-style-type: none"> • None.

5-21 Exclusivity with Entertainers – Provide a statement as to whether the applicant intends to incorporate a geographic exclusivity clause into agreements with its entertainers engaged to perform at a venue within its proposed Massachusetts gaming establishment. If so, please explain the nature of the agreements.		
Overall Comments on all Applications		
	Mohegan Sun Revere	Wynn Everett
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • Applicant does not intend to incorporate a geographic exclusivity clause into agreements with entertainers performing at venues within the resort. • Intends to work with regional venues on “synergies in bookings and appearances”. 	<ul style="list-style-type: none"> • Applicant does not intend to incorporate a geographic exclusivity clause into agreements with any entertainers engaged to perform at a venue within the Resort.

Criterion 2: Traffic & Offsite Impacts

The evaluation of this criterion focused on the Applicant's response to questions grouped below regarding the adequacy of the existing infrastructure, traffic management and impacts related to housing, school population and emergency services. Of particular significance is the Group 2 - Traffic Management questions, which are important to the general public. The Massachusetts Environmental Policy Act (MEPA) process provides a forum for the public to comment on existing traffic conditions and concerns related to impacts due to the proposed development. If project traffic reduces level of service, the Applicant must develop a mitigation plan through the MEPA process. Agreements to mitigate traffic impacts are also incorporated into the host community agreement as well as surrounding community agreements. It is in the interest of the Applicant to ensure convenient and safe access and egress for its customers and employees. The adequacy of infrastructure and ability to accommodate existing and site generated traffic is a function of site location and access to the regional and interstate highway systems.

GROUPING OF QUESTIONS BY SIMILIARITY		
Group 1 – Impact Assessments and Costs	5- 1 Infrastructure Costs 5-2 Impacts and Costs	These questions relate to how well the applicant identifies potential impacts and required off-site infrastructure improvements and costs.
Group 1 Rating	Mohegan Sun Revere	Wynn Everett
	Sufficient	Insufficient
Both applicants provided adequate information for the estimated cost of infrastructure improvements, as well as the economic impacts in the immediate vicinity of each project and throughout Massachusetts. However, Wynn did not identify all required transportation infrastructure improvement costs, primarily due to the inadequate improvements proposed at Sullivan Square.		
Group 2 – Traffic Management Plan	5-33 Traffic Control Measures 5-34 Traffic for Special Events 5-35 Snow Removal	These questions relate to mitigating the off-site traffic impacts and managing the site's traffic access and parking supply. As requested, the mitigation actions should address public transportation, special events, construction period impacts and snow removal plans.
Group 2 Rating	Mohegan Sun Revere	Wynn Everett
	Sufficient	Insufficient
MSM proposes to construct transportation improvements at numerous locations to mitigate their impacts. The most significant mitigation is proposed along Route 1A, including the Boardman St intersection. In addition, improvements are proposed at the Route 1/Route 16 interchange, at Bell Circle, at Copeland Circle, and at Beachmont Station. The mitigation proposed by MSM adequately addresses projected impacts. Wynn also proposes to construct transportation improvements at many locations, with their most significant mitigation proposed along Broadway (Route 99), at Sweetser Circle, at Santilli Circle, at Wellington Circle, and at Sullivan Square. However, it is noted that the proposed mitigation at Sullivan Square is inadequate and incomplete, because the proposed improvements do not fully mitigate the additional traffic and no improvements are proposed at the Sullivan Square rotary intersections with Rutherford Avenue, Main Street, or Alford Street. Please see Appendix C of the "Report to the Commissioners for Category #4 – Building and Site Design" for a detailed discussion of the off-site traffic operations relating to both applicants.		

Group 3 – Other Potential Impacts	5-36 Housing 5-37 School Population 5-38 Emergency Services Available	The intent of these questions was to assess the impact of increased population in the community.	
Group 3 Rating	Mohegan Sun Revere		Wynn Everett
	Sufficient		Sufficient
	MSM’s answers were more comprehensive and supported by studies. Wynn’s responses were adequate, but not as detailed. Independent evaluations indicated that there would be no significant adverse impacts to housing and school populations in area communities. MSM attached specific dollar amounts to mitigation for schools and emergency services within their agreements with Host and surrounding communities. Wynn did not assign specific dollar amounts as some city officials may prefer to have greater flexibility on the expenditure of funds.		

*These questions derive from the gaming regulations, G.L. c. 23K are specifically called out in §18 (8) as objectives each Applicant proposes to advance, and that the Commission shall evaluate and issue a statement of findings.

5-01 Infrastructure Costs - Identify the infrastructure costs to the host and surrounding communities from construction and operation of a gaming establishment. May reference response to question 5-2 (See related agreement in section B. Signature Forms).		
Overall Comments on all Applications		
	Mohegan Sun Revere	Wynn Everett
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • Total off-site infrastructure estimated costs at \$55.5 million: <ul style="list-style-type: none"> - \$46.5 million in transportation infrastructure costs - \$9 million in utility infrastructure costs • Minimum \$25 million annual Community Impact Fee to the City of Revere. This may increase over time based on the Gross Gaming Revenue for each year. • Minimum \$18 million annual fee to the City of Boston, as well as a percentage of gross gaming revenues. • \$2.5 Million annually to the City of Chelsea as Community Impact Fee which will be increased each year by the Consumer Price Index. • The off-site mitigation includes: <ul style="list-style-type: none"> - Route 1A infrastructure improvements - Route 1/Route 16 intersection - Route 16 / Revere Beach Parkway / Harris Street intersection - Donnelly Square - North Shore Rd / Revere Beach Pkwy / Tomasello Dr intersection - Bell Circle - Brown Circle - Revere Street at Route 60 and at Route 1A - Copeland Circle - Saratoga Street at Bennington Street and at Boardman Street - Neptune Road from Chelsea Street to Frankfort Street - Route 1A Southbound Ramp at Curtis Street - Streetscape improvements in the Beachmont Neighborhood in the City of Revere - Route 1A planning in Revere - Copeland Circle Planning - Route 60 Planning - All of the above at an estimated cost of \$45 million from the Supplemental Draft Environmental Impact Report (SDEIR) - Beachmont MBTA station improvements = \$1,500,000 • Applicant has committed to the following infrastructure improvements, but has not yet estimated associated costs: <ul style="list-style-type: none"> - Furlong Drive improvements 	<ul style="list-style-type: none"> • On site facility infrastructure cost = \$957 million (excluding indirect costs, soft costs, and site improvements) • Off-site infrastructure improvements estimated at = \$64.2 million: <ul style="list-style-type: none"> - \$42 million in transportation infrastructure costs - \$20 million in intermodal transportation improvements - \$2.2 million in utility infrastructure costs • Additional \$30 million “Community Enhancement Fee” to the City of Everett over the period of 3 years which will be used for capital improvement projects by the City. • Annual \$5 million Community Impact fee to the City of Everett which grows 2.5% annually. • Annual \$1 million Community Impact fee to the City of Malden which grows 2.5% annually. • The off-site mitigation includes: <ul style="list-style-type: none"> • Santilli Circle • Sweetser Circle • Lower Broadway (Route 99) corridor • Broadway / Norwood Street / Chelsea Street • Lower Broadway Truck Route, including the reconstruction of Robin Street and Dexter Street • Broadway / Ferry Street • Wellington Circle • Traffic signal timing optimization at two locations on Route 16 in Medford • Sullivan Square • Bell Circle • Route 16 / Washington Avenue • Traffic signal timing optimization at three locations on Route 16 in Chelsea • All of the above at an estimated cost of \$42 million from the Final Environmental Impact Report (FEIR) • Proposed mitigation at Sullivan Square was estimated at \$4.6 million in the FEIR, though Surrounding Community agreements with Somerville and Cambridge indicate that approximately \$6 million will be spent to mitigate Sullivan Square in the short-term.

	<ul style="list-style-type: none"> - Transportation Demand Management program - Electrical service upgrades • No infrastructure costs will be incurred by the Host community for either construction or operation of the gaming establishment. • Costs identified above are separate from the \$6 million initial payment and \$9 million annual payments (until opening) to Revere. 	<ul style="list-style-type: none"> • The Applicant indicated that the legislation for gaming requires 25% of annual gaming revenue to be paid to the Commonwealth. Out of which 15% must be designated for Transportation Infrastructure and Development Fund (TIDF). The Applicant estimates \$30+ million per year to be paid to the TIDF from Wynn Everett alone. • The Applicant has committed to study and fund the design of a long-term solution at Wellington Circle, and has stated that construction could be paid for with the TIDF. <ul style="list-style-type: none"> - It is noted that the Applicant will not have any control over how the TIDF will be spent. • Applicant had previously offered in their Draft Environmental Impact Report (DEIR) to fund further study and preliminary design of a long-term solution at Sullivan Square but has since withdrawn that offer, in the Final Environmental Impact Report (FEIR), as the Applicant notes that the City of Boston has already secured funding for design from another source. • The Applicant agrees to be responsible for all of the Project’s known transportation infrastructure impacts, including impacts from the on-going operation of the proposed gaming facility and any temporary impacts during construction.
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5-02 Impacts and Costs - Provide completed studies and reports showing the proposed gaming establishment's: (i) cost to the host community and surrounding communities and the Commonwealth for the proposed gaming establishment to be located at the proposed location, and (ii) local and regional social, environmental, traffic and infrastructure impacts.		
Overall Comments on all Applications		
	Mohegan Sun Revere	Wynn Everett
Application Commitments (e.g., targets, processes, plans)	<p>One time economic impact during casino development period:</p> <ul style="list-style-type: none"> • Suffolk County <ul style="list-style-type: none"> - \$821 million in total economic activity - 4,478 Jobs - \$321 million in salaries and wages • MA State <ul style="list-style-type: none"> - \$1.048 billion in total economic activity - 7,335 Jobs - \$469 million in salaries and wages <p>Ongoing economic Impact (projected for 1st year):</p> <ul style="list-style-type: none"> • Suffolk County <ul style="list-style-type: none"> - \$482 million in total economic activity - 4,521 Jobs - \$194 million in salaries and wages • Massachusetts <ul style="list-style-type: none"> - \$616 million in total economic activity - 5,586 Jobs - \$256 million in salaries and wages <p>Fiscal (Tax) Impacts</p> <ul style="list-style-type: none"> • Gaming taxes = \$214.5 million (25% of Gross Gaming Revenue) • Gaming Commission Funding = \$2.4 million (\$600 per slot machine) • Total state and local taxes (includes sales, social insurance, property & corporate, personal income and excise taxes) <ul style="list-style-type: none"> - One time = \$50 million • Recurring = \$124 million (estimated for 1st year of operation) • SDEIR addresses environmental, traffic, social, and infrastructure impacts. • Refer to 5-33 for discussion on proposed traffic mitigation. 	<p>Studies provided:</p> <ul style="list-style-type: none"> • Impact of the Wynn Resort Casino on Neighboring Communities. • Economic and Fiscal Impact Evaluation of the Proposed Wynn Resort Casino Development in Everett, Massachusetts. • Wynn Everett Gaming Market Assessment. <p>Economic and Fiscal Impacts:</p> <ul style="list-style-type: none"> • Over \$900 million annual recurring local revenue • 10,000 one time construction jobs (5,200 direct and 4,800 indirect jobs) • 5,400 annual recurring jobs (both direct and indirect) • \$380 million in onetime construction wages over the period of 2-3 years • \$300 million annual recurring wages • \$15-\$23 million in local-wage spending from direct employees. • \$40-\$50 million in annual purchases of goods. • Additional off-site consumer spending in neighboring communities • \$5 million per year in community impact fee <p>Short Term Receipts</p> <ul style="list-style-type: none"> • City of Everett <ul style="list-style-type: none"> - Building Permit Fees = \$14,778,075 - Sales Tax (Const.)\$2,870,100 - Total = \$17,648,175 • Commonwealth of Massachusetts <ul style="list-style-type: none"> - Income Tax (Direct/Const.) = \$16,339,849 - Sales Tax (Const.) = \$23,917,500 - Gaming License = \$85,000,000 - Total = \$125,257,349 <p>Ongoing Receipts</p> <ul style="list-style-type: none"> • City of Everett <ul style="list-style-type: none"> - Net Property Taxes = \$17,625,606 - Sales Tax = \$547,500 - Hotel Tax = \$2,052,000 - Total = \$20,225,106 • Commonwealth of Massachusetts <ul style="list-style-type: none"> - Sales Tax = \$6,193,750 - Hotel Tax = \$1,949,400 - Gaming Tax = \$207,055,000

		<ul style="list-style-type: none"> - Slots Renewal = \$1,800,000 - Income Tax (Direct) = \$6,294,044 - Total = \$223,292,194 <p>Direct Impacts</p> <ul style="list-style-type: none"> • City of Everett <ul style="list-style-type: none"> - Ongoing Employment = 3,627 - Ongoing Wages = \$160,781,597 • Commonwealth of Massachusetts <ul style="list-style-type: none"> - Short Term Employment = 5,155 - Short Term Wages = \$382,680,000 <p>Indirect Impacts</p> <ul style="list-style-type: none"> • Commonwealth of Massachusetts <ul style="list-style-type: none"> - Ongoing Employment = 1,791 - Short Term Employment = 4,867 - Ongoing Wages = \$143,641,736 - Short Term Wage = \$335,686,896 • Provided DEIR and FEIR to address environmental, traffic, social, and infrastructure impacts. • Refer to 5-33 for discussion on proposed traffic mitigation.
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5- 33 Traffic Control Measures – Describe the plans for traffic control measures the applicant proposes for the gaming establishment complex and the surrounding areas, the expected total vehicle traffic generated by the site, and plans for mitigating vehicle trips to and from the site both during construction and operation of the facilities. Further, describe efforts to encourage public transportation options to access the site, and pedestrian access and amenities of the site and surrounding area.		
Overall Comments on all Applications		
	Mohegan Sun Revere	Wynn Everett
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> Project site generated trips are as follows (from SDEIR) <ul style="list-style-type: none"> Average daily = 21,728 vehicles per day Friday evening peak hour = 1,565 vehicles per hour Saturday midday peak hour = 1,576 vehicles per hour To encourage public transportation, the applicant is proposing to upgrade and expand Beachmont Station in collaboration with MBTA. Pedestrian and bicycle connections will be provided to the site via new bike lanes along Bennington street and Winthrop street. The applicant proposes to implement Transportation Demand Management (TDM) measures and traffic reduction strategies, as required by MEPA. Incentives to encourage public transit, particularly for employees. Promoting walking, bicycling, ridesharing and transit. The applicant proposes to mitigate traffic via proposed improvements. Major improvements are proposed at following locations: <ul style="list-style-type: none"> Route 1A Route 1 / Route 16 Route 16 / Revere Beach Pkwy/ Harris St Donnelly Square North Shore Rd / Revere Beach Pkwy / Tomasello Dr Bell Circle Copeland Circle The applicant’s SDEIR contains two alternatives for Route 1A improvements: a flyover ramp over Boardman Street in the northbound direction, and a series of at-grade traffic signals. Either alternative would improve traffic flow on Route 1A. During construction, limits will be instituted on work impacting traffic flow, particularly during peak hours. No details were provided relative to the limits on work during peak periods. 	<ul style="list-style-type: none"> Project site generated trips are as follows (from FEIR): <ul style="list-style-type: none"> Friday daily = 18,848 vehicles per day Friday evening peak hour = 1,385 vehicles per hour Saturday daily = 23,674 vehicles per day Saturday midday peak hour = 1,915 vehicles per hour To encourage public transportation, the applicant is providing shuttle service to MBTA Orange line stations. The applicant will also provide a “premium park & ride” service with connections to Logan airport, Braintree, Framingham, Woburn. Applicant proposes to encourage the pedestrian and bicycle to site by redesigning Route 99 with complete street concept with bike lane and pedestrian accommodation. Pedestrian and bicycle accommodation will be provided throughout the site. The Applicant proposes to implement a Transportation Demand Management (TDM) measures and traffic reduction strategies, as required by MEPA. Applicant proposes to mitigate traffic via proposed improvements. Some major improvements are proposed at Route 99, Santilli Circle, and Sweetser Circle. To a lesser extent, improvements are also proposed at Wellington Circle and Sullivan Square. The proposed improvements at Sullivan Square are incomplete: traffic analyses were not provided at all new signalized intersections, and the proposed improvements do not address traffic operational deficiencies on the eastern portion of Sullivan Square. Applicant also proposes to fund the study and conceptual design of Wellington Circle in Medford. During construction the Applicant proposes to implement tactics to mitigate traffic which includes: <ul style="list-style-type: none"> Phased starting of trades to off peak hours, Off-site parking and busing to site, MBTA busing and Marine transport. Utilization of lean building practice to maximize off-site fabrication Prepare staging and traffic management plans , Providing work hours from 7:00 AM to 3:30 PM to limit the workers' travel to off-peak hours. Employees will be encouraged to use public transportation and carpooling.

5- 34 Traffic for Special Events – Describe the applicant’s plans for accommodating special events and the traffic those events may generate.		
Overall Comments on all Applications		
	Mohegan Sun Revere	Wynn Everett
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • The applicant will use special events to drive business throughout the year. • A host of measures will be implemented to assist with traffic control and operation devices to guide motorists during these events. Measures to be deployed includes: <ul style="list-style-type: none"> - Effective scheduling of events to the maximum extent possible to avoid conflicts with other planned events in region that might generate significant traffic volumes. • Other traffic control and operation measures include: <ul style="list-style-type: none"> - Use of physical barriers and channelizing devices. - Additional traffic control personnel at both onsite and at critical. offsite intersections. - Public notice through public information efforts - Advertising of alternate routes, increased use of public transportation and resort’s ground shuttle operation and other efforts. • The MSM Transportation supervisor will coordinate with the City of Revere, Boston, MassDOT, DCR, Massport and other stakeholders to ensure the traffic from special event does not adversely impact surrounding areas. • In many cases the special event will be scheduled at off peak hours. 	<ul style="list-style-type: none"> • The applicant is not expecting to accommodate larger events on site. The traffic infrastructure will be designed for the maximum utilization of all the facilities at Wynn resort. • Special events like conferences, wedding or retail promotions are not expected to produce traffic or parking in excess of what is being designed for. • The Wynn resort does not include concert hall or sports events. • The applicant proposes to provide traffic and parking overflow in the areas of vehicle drop-offs in case of unforeseen spikes in traffic. • The applicant stated that the proposed driveway configuration can handle significant additional traffic. However, there are on-site circulation concerns with the vehicle queues extending beyond (or into) the parking garage entrance/exit. • The applicant plans to use police detail in case of unusual traffic and delay.

5- 35 Snow Removal – Describe the applicant's snow-removal plans.		
Overall Comments on all Applications		
	Mohegan Sun Revere	Wynn Everett
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> MSM will manage its own snow removal. MSM will have plans to clear snow and ice after 1 inch accumulation, in poor conditions caused by less than 1 inch, or during gradual accumulation of snow resulting in poor condition. Snow will be cleared to bare pavement. Snow will be cleared from all sidewalks, stairs and steps and will be treated for ice. Snow will not be piled within the paved surfaces, on landscape medians/islands, at light poles, on corners or in sidewalk/crossing areas. Area of plowing includes any non-public streets in premises, including all parking lots, top level of parking garage, valet lanes, ingress and egress points, and any other drive used in the ordinary course of business by employee and guests. 	<ul style="list-style-type: none"> Snow removal will be done through traditional methods of plowing, blowing and shoveling. The applicant does not plan to store significant quantities of snow on-site. Trucking will be utilized for disposal of snow in accordance with environmental regulations. Stormwater management system will be utilized for on-site melting and resulting runoffs. Mechanical snow melting will not be employed.

5- 36 Housing - Provide an assessment of the likely impact on the housing stock in the host and surrounding communities resulting from the new jobs the gaming establishment provides, and the steps the applicant plans to take to remedy any negative impacts.		
Overall Comments on all Applications	Both applicants answered the question, but Revere/MSM provided a much more comprehensive response with supporting documentation. MGC's consultant analysis found that there is unlikely to be significant adverse impacts to housing in the area. The dense urban location is well served by public transit, which will be enhanced by employer provided shuttles. The high unemployment rates in the host cities and nearby communities suggest that the majority of the nearly 4,000 jobs can be filled by existing residents that will not need to relocate.	
	Mohegan Sun Revere	Wynn Everett
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> Applicant refers to attached study. Indicates that there is substantial available housing. The answer is quite detailed and is supported by four attachments, including a detailed answer, a school impact statement, a property value study and case studies. 	<ul style="list-style-type: none"> Applicant provided a general answer to this question and did not provide supporting documentation.

5- 37 School Population – Provide an assessment of the likely impact on school populations in the host and surrounding communities resulting from new jobs the gaming establishment provides, and the steps the applicant plans to take to remedy any negative impacts. Also, please describe the proximity and potential impact of the gaming establishment to local schools, religious institutions and facilities, and public fields and parks, including any plans designed to avoid interference with school buses, student drop-offs, local athletic events, and other education related activities, especially during peak student transportation hours.		
Overall Comments on all Applications	MSM cites study when presenting its findings. Wynn does not cite a study in its answer. Neither predicts a significant impact on school population. MSM notes \$1M Mitigation Funds earmarked for schools. Wynn implies it will be philanthropic.	
	Mohegan Sun Revere	Wynn Everett
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> Applicant indicates that 75% of employees will be resident within 15 miles of the facilities, so the impact will not be significant. (study cited) Notes that \$1M of mitigation money is going to Revere Public Schools. 	<ul style="list-style-type: none"> Applicant indicates that there will be ‘no material impact’ on school population. Applicant also indicates that there are on-going discussions with the School Superintendent.
Existing and past practices supporting commitments		Applicant notes company’s previous philanthropy in the area of education as an indicator of its commitment.

5- 38 Emergency Services Available – Provide an analysis of available police, fire and emergency medical services available to the gaming establishment complex, the adequacy of those resources, the steps the applicant plans to take to remedy any deficiencies, and the agreements the applicant has made with the service providers to ensure that the appropriate levels of protection are available.		
Overall Comments on all Applications	MSM has a more robust answer in this category, although the Wynn answer is sufficient. The MSM agreement has more earmarking than the Wynn Agreement. That should not be held against Wynn as the local decision makers may have wanted to retain that decision-making authority.	
	Mohegan Sun Revere	Wynn Everett
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> Applicant provides a very thoughtful answer. It notes that \$2M each in mitigation will be provided to Revere police and fire. It also details that public safety plans will be developed for the facility to enhance safety and mitigate potential impact. 	<ul style="list-style-type: none"> Applicant’s answer indicates that a portion of the \$5M in mitigation may be available to mitigate any effect on police and fire in Everett.

Criterion 3: Implement Measures to Promote Responsible Gaming and Address Problem Gambling

Criterion 3 included measures taken by the Applicant to mitigate problem gambling and promote responsible gaming. Questions in this criterion focused on proposed activities in Massachusetts but also consider initiatives the applicants have undertaken at other operations. Mitigating problems by addressing problem gambling and promoting responsible gaming is a guiding value expressed in the mission statement of the Massachusetts Gaming Commission. The series of ten questions in Criterion 3 are intended to capture the direct and indirect activities that the applicants will employ to mitigate problem gambling. It should be noted that while the MGC intends to adopt regulation that will aggressively work to promote responsible gaming and mitigate problem gambling, we also believe the successful applicant has the duty of seeing this carried out in all aspects of their operations.

GROUPING OF QUESTIONS BY SIMILARITY		
Group 1 – Direct efforts to mitigate problem gambling/promote responsible gaming	5- 23 On Site Resources for Problem Gambling 5- 25 Self Exclusion Policies 5- 26 Identification of Problem Gambling 5- 27 Credit Extension Abuse 5- 31 Treatment and Prevention	Represents activities the applicants will do on-site and in coordination with community providers.
Group 1 Rating	Mohegan Sun Revere	Wynn Everett
	Sufficient/Very Good	Sufficient
	MSM demonstrates a commitment to addressing problem gambling through many aspects of their operations as outlined in their draft Responsible Gaming Plan. The staff training on problem gambling is thorough and detailed. The applicant’s responses to questions on self-exclusion and credit extension abuse were adequate and they are active participants with the Commission as regulations are being developed.. The applicant also provided a thorough plan describing linkage to treatment programs but was less specific when describing prevention initiatives. Wynn stated that they adhere to policies and procedures commensurate with recommendations made by the American Gaming Association (AGA). They also explicitly state they are willing to work with the MGC to “develop strategies to minimize the harm of high risk gambling”.	
Group 2 – Processes and measures	5- 28 Code of Ethics 5- 29 Metrics for Problem Gambling 5- 32 Historical Efforts Against Problem Gambling	Includes questions relating to supporting processes to assure internal controls to mitigate problems are in place.
Group 2 Rating	Mohegan Sun Revere	Wynn Everett
	Very Good	Sufficient
	MSM set forth a code of ethics with detailed expectations about responsible gaming. MSM has a demonstrated history in addressing responsible gaming (RG) and supporting problem gambling research and awareness efforts through	

	involvement with the National Council on Problem Gambling (NCPG), the Center of Excellence for Gaming Research, and state affiliates to the NCPG in those states where they operate casinos. Wynn follows the AGA responsible gambling principles. The ethics codes address aspects of responsible gaming including a standalone “promoting responsible gaming” set of practices. The applicant is involved and supports efforts at a local and national level to mitigate gambling harm.	
Group 3 – Indirect efforts to mitigate problem gambling/promote responsible gaming	5- 30 Advertising Responsible Gambling 5- 24 Problem Gambling Signage	Represents passive ways in which the applicants will work to promote responsible gaming and educate about problem gambling. Both questions in this category are important toward addressing problem gambling and promoting responsible gaming.
Group 3 Rating	Mohegan Sun Revere	Wynn Everett
	Very Good	Sufficient
MSM described specific and intentional efforts to develop a socially responsible marketing plan; it includes multiple strategies that are reflective of their deep understanding of the complexity of these issues. A variety of signage and marketing products are intended to reach patrons and employees with gambling related problems. Wynn’s response was adequate in regard to questions about problem gambling signage. They use the “know your limits” tag on player card, room keys and brochures in the establishment. However, this tag line more appropriately promotes responsible gaming than raises awareness about problem gambling. Signage is located throughout the gaming facility to direct persons with gambling problems to assistance.		

*These questions derive from the gaming regulations, G.L. c. 23K are specifically called out in §18 (8) as objectives each Applicant proposes to advance, and that the Commission shall evaluate and issue a statement of findings.

5- 23 On Site Resources for Problem Gambling – Describe the on-site resources that will be accessible to those affected by gambling-related problems. (See associated agreement in section B. Signature Forms)		
Overall Comments on all Applications	Both applicants stated that they intend to work with MGC to develop on site resources. Both applicants signed a statement as part of their application agreeing to mitigate the potential negative public health consequences associated with gambling and the operation of a gaming establishment including <i>“(ii) providing complimentary on-site space for an independent substance abuse and mental health counseling service to be selected by the Commission”</i> .	
	Mohegan Sun Revere	Wynn Everett
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> The Applicant provided a detailed plan to implement on-site resources. The response demonstrated a willingness to think outside the box and explore on-site resource methods utilized in Canadian jurisdictions. The response also emphasized the Applicant’s willingness to work with the Commission and other stakeholders to establish the details necessary to develop on-site resources. 	<ul style="list-style-type: none"> Wynn’s response was adequate. The Applicant recognized the need to work with MGC and others to develop MA specific programs, and emphasized the importance of employee training and orientation to address problem gambling and RG.

5- 24 Problem Gambling Signage – Describe the signs, alerts and other information that will be available in the gaming establishment complex to identify the on-site resources available for those affected by gambling-related problems. (See associated agreement in section B. Signature Forms)		
Overall Comments on all Applications	Both applicants signed a statement as part of their application agreeing to mitigate the potential negative public health consequences associated with gambling and the operation of a gaming establishment including <i>“(iii) prominently displaying information on the signs of problem gambling and how to access assistance”</i> .	
	Mohegan Sun Revere	Wynn Everett
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> Applicant’s response was complete and included some novel approaches to RG signage including the use of video clips and revolving posters as part of a larger longer-term campaign. Employee targeted signage was included in the response. Response stated desire to work with MGC and others, and inclusion of signage (“blade signs”) for the onsite “gaming resources center”. 	<ul style="list-style-type: none"> The Applicant provided a thorough description of how problem gambling signage or RG messaging is integrated into their practices such as providing the “Know Your Limits” tag on room keys and player cards. The response does not completely address the question as the “know your limits” campaign is geared to promote responsible gaming and not target problem gambling.

5- 25 Self Exclusion Policies – Describe the exclusion policies that will be available for gaming establishment patrons and employees, including the process that will be utilized to notify individuals of the availability of self-exclusion and the steps that will be taken to assist those who request exclusion. (See associated agreement in section B. Signature Forms)		
Overall Comments on all Applications	Both applicants signed a statement as part of their application agreeing to mitigate the potential negative public health consequences associated with gambling and the operation of a gaming establishment including <i>(iv) a process for individuals to exclude their names and contact information from a gaming licensee’s database or any other list held by the gaming licensee for use in marketing or promotional Communications”.</i>	
	Mohegan Sun Revere	Wynn Everett
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> The Applicant references previous experience with self-exclusion practices from other facilities and desire to share that information with the MGC to assist in the development of policies. The Applicant addressed third party self-exclusions and their intent to develop a brochure specifically for this program, along with the self-exclusion program. 	<ul style="list-style-type: none"> Stated the understanding and desire to follow any regulation created by the MGC. The “self-limiting” letter stated that persons who enroll in the self-limit credit program can sign a marker above their limit and that will serve as an indication to withdraw the previously expressed limit. One aspect of their response was the intention to exclude persons on the Wynn self-exclusion list from all their properties.

5- 26 Identification of Problem Gambling – Describe the initial and ongoing training that will be used to help gaming establishment employees identify those who may have gambling-related problems, or self-identify, and assist them to obtain help for those problems.		
Overall Comments on all Applications		
	Mohegan Sun Revere	Wynn Everett
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> The Applicant provided thorough detail of employee training programs. MSM uses a top-down approach that includes an RG mission statement, management support and training, and resources for employees with gambling problems. The curricula provided could be improved upon and the applicant stated a willingness to do so in collaboration with the MGC. 	<ul style="list-style-type: none"> Applicant emphasized employee training and provided attachments of the RG training materials. Employees receive a two-day orientation that includes responsible gaming – though it wasn’t clear how extensive the responsible gaming portion of the orientation is. The response described a “back-of-house” campaign to target employees with information and treatment options.

5- 27 Credit Extension Abuse – Describe the policies the applicant will use to ensure that credit extensions are not being abused by those with gambling-related problems.		
Overall Comments on all Applications		
	Mohegan Sun Revere	Wynn Everett
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> Response provided good detail including written policy to not issue credit based on generating revenue. Within the credit application example, the person seeking credit could set limits on how much credit they receive. The credit application example did not include questioning of the patron regarding concerns they may have about their gambling or operator policy not to issue credit to persons concerned about their ability to manage their gambling. 	<ul style="list-style-type: none"> The Applicant provided a detailed set of policies related to managing credit extension abuse. Policies included providing a maximum credit line increase of 10% if additional credit is requested during a gambling session; and, if a customer states they have a gambling problem, their ability to access credit is removed.
Existing and past practices supporting commitments	The Applicant provided a good description of their credit process including data on the amount of revenue generated via credit and statement indicating a small portion of those revenues came from problem gamblers (unclear how that was determined).	The Applicant demonstrated they have policies and procedures in place in their properties to address credit extension abuse. How well those policies are working were unclear as no data was provided.

5- 28 Code of Ethics – Provide a copy of the code of ethics employees, including senior managers, are required to follow and the process by which the code is promulgated.		
Overall Comments on all Applications		
	Mohegan Sun Revere	Wynn Everett
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> The Applicant provided a Code of Ethics for principle officers. The Applicant provided detailed company policies reflective of ethics they follow rather than providing a separate Code of Ethics for employees. The Code for principle officers did not specifically mention responsible gaming or problem gambling. The employee policies did so and included policies not allowing employees to gamble on premise, encouraging them to seek assistance when concerned about a patrons gambling behavior or their own. Appreciated all the detail provided in the employee policies, with many references to policies that could be considered to fall under responsible gaming. 	<ul style="list-style-type: none"> The Applicant has developed a number of policies and ethics codes that address aspects of RG including a standalone “promoting responsible gaming” set of practices that appear to follow the AGA responsible gaming principles.

5- 29 Metrics for problem Gambling – Describe the metrics the applicant will use to measure whether it is succeeding in its efforts to reduce gambling at its gaming establishment by those with gambling-related problems and the use to which those metrics will be put and provide the data those metrics have generated for each of the last five years at each of the applicant's facilities. Further, please describe how the applicant proposes to cooperate and support the Commission in the development of an annual research agenda as provided in G.L. c. 23K, §71.

Overall Comments on all Applications		
	Mohegan Sun Revere	Wynn Everett
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> Applicant described metrics on self-exclusion but those metrics included extensive detail such as the number of persons who self-excluded who sought help, number of persons self-excluded in other jurisdictions, extensive demographic information. 	<ul style="list-style-type: none"> The applicant did not address the metrics to measure effectiveness of RG measures. An article was attached describing a high profile example of an instance when Wynn excluded a high roller due to concerns over his gambling behaviors, but the response did not address metrics.

5- 30 Advertising Responsible Gambling – Describe the extent to which responsible gambling messages will be part of the applicant's advertising.

Overall Comments on all Applications		
	Mohegan Sun Revere	Wynn Everett
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> Applicant provided a set of responsible gambling advertising guidelines they follow along with mention of some responsible gambling advertising they do. RG taglines are incorporated on marketing and advertising collateral. While good attention was provided in these areas, some specifics were absent such as what proportion of the advertising budget would be devoted to RG messaging. 	<ul style="list-style-type: none"> Applicant stated “Wynn uses Responsible Gaming language in all gaming-related promotions and advertisements and other marketing materials, to the extent feasible”. They also follow RG advertising guidelines and provided examples of RG advertising they have done in the past.

5- 31 Treatment and Prevention – Describe the plans the applicant has to coordinate with local providers to facilitate assistance and treatment for those with gambling-related problems and plans to develop prevention programs targeted toward vulnerable populations as the term is defined by 205 CMR 102.02.		
Overall Comments on all Applications		
	Mohegan Sun Revere	Wynn Everett
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> Applicant stated intent to work with MA Council on Compulsive Gambling, local community providers and agencies, the Department of Public Health, and the MGC to facilitate access to treatment programs. Response included a description of past efforts adding to the credibility of their stated intent to work with various groups to support treatment efforts. The response did not address their plans to develop prevention programs. 	<ul style="list-style-type: none"> Applicant acknowledged the importance of treatment and stated a desire to coordinate and build relationships with local treatment providers and to coordinate with the MGC to promote treatment. The response did not address their plans to develop prevention programs.

5- 32 Historical Efforts Against Problem Gambling - Describe the processes the applicant uses to address problem gambling at the other facilities it owns or controls, the effectiveness of those processes, and the metrics the applicant uses to determine the effects.		
Overall Comments on all Applications		
	Mohegan Sun Revere	Wynn Everett
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> Applicant demonstrated history in tending to RG and supporting problem gambling research and awareness efforts through involvement with the NCPG, the Center of Excellence for Gaming Research, and state affiliates to the NCPG in those states where they operate casinos. The Applicant stated what self-exclusion metrics they capture and acknowledged the difficulty measuring the impacts of their RG practices in regard to social impacts. 	<ul style="list-style-type: none"> Applicant demonstrated history in tending to RG, with voluntary adoption of AGA Code of Conduct in 2004, and following Nevada laws that address RG and problem gambling. The Applicant did not respond to important facets of the question including: metrics the applicant uses to determine, effectiveness of those processes used to address problem gambling and acknowledged the difficulty to evaluate the effectiveness of such efforts.

Criterion 4: Protect and Enhance Lottery

In reviewing this criterion, it was noted that the Applicant must agree to be MA State Lottery sales agents and, as such, will have an executed agreement with the MA State Lottery. The Applicant was asked to present plans, measures and steps they intend to take to avoid negative impact on revenues currently generated by the MA Lottery. The Applicant was also asked to give examples of joint marketing opportunities and strategies to increase lottery ticket sales.

GROUPING OF QUESTIONS BY SIMILARITY		
Group 1 – State Lottery	5-22 State Lottery	Only one question in this category.
Group 1 Rating	Mohegan Sun Revere	
	Sufficient	
	MSM provided a more comprehensive, compelling answer in this category. Wynn’s response was adequate.	
Wynn Everett		
Sufficient		

*These questions derive from the gaming regulations, G.L. c. 23K are specifically called out in §18 (8) as objectives each Applicant proposes to advance, and that the Commission shall evaluate and issue a statement of findings.

5- 22 State Lottery – Describe the plans, measures and steps the applicant intends to take to avoid any negative impact on the revenues currently generated by the Massachusetts State Lottery, including cross-marketing strategies with the lottery and increasing ticket sales to out-of-state residents. Further, provide a written plan demonstrating the manner in which the lottery and keno games shall be made readily accessible to the guests of the gaming establishment including the designation of any lottery outlet retail floor space. (See associated agreement in section B. Signature Forms).		
Overall Comments on all Applications		
	Mohegan Sun Revere	Wynn Everett
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> Applicant provided a detailed response that addressed being a lottery sales agent, the installation of terminals and commitment to promoting the Lottery. The Applicant has executed a Sales Agent Agreement with the MA State Lottery Commission in advance of the application submission. Lottery officials confirmed that they had a productive working relationship with Mohegan Sun. 	<ul style="list-style-type: none"> Applicant provided a less detailed response to promoting the Lottery. Applicant is actively negotiating an Agreement with the Lottery. If approved the Applicant has committed to installing eight (8) terminals. Lottery officials confirmed that they have met with Wynn representatives and expect that an agreement can be completed.