

# **MASSACHUSETTS GAMING COMMISSION SURROUNDING COMMUNITY PETITION ANALYSIS**



**COMMUNITY: City of Everett**  
**APPLICANT: Mohegan Sun, LLC**

March 20, 2014

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## INTRODUCTION AND OVERVIEW

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The Community has submitted to the Commission a petition to be designated as a surrounding community to the Applicant's proposed gaming establishment in accordance with G.L. c. 23K, §§ 4(33) and 17(a) and 205 CMR 125.01(1)(c). The Applicant has submitted a response to the petition.

In making its determination, the Commission must consider the factors in G.L. c. 23K, §§ 4(33) and 17(a) including population, infrastructure, distance from the gaming establishment and political boundaries.

The Commission must review, in accordance with G.L. c. 23K, §§ 4(33) and 17(a) and 205 CMR 125.01(2)(b), the Applicant's entire application; the Applicant's RFA-2 detailed plan of construction; any independent evaluations; any pertinent information received from the Community, the Applicant, the Applicant's host community, and the public; and any additional information that the Commission determined to be beneficial in making its determination.

The Commission's regulations lay out the six criteria that the Commission should consider in making its determination:

1. Proximity
2. Transportation Infrastructure
3. Development
4. Operation
5. Other
6. Positive Impacts

This document lays out the six criteria and provides the legal framework that the Commission must consider, an executive summary of the issues, the Community's petition, the Applicant's response, RPA analysis, ENF analysis, consultant analysis, relevant RFA-2 application question responses, and other relevant materials.

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# 1. PROXIMITY

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## Legal Framework

Chapter 23K defined surrounding community as a “municipalities in proximity to a host community which the commission determines experience or are likely to experience impacts . . . .” In determining whether a community is a surrounding community, the commission . . . will evaluate whether: . . . The community is in proximity to the host community and the gaming establishment included in the RFA-2 Application, taking into account such factors as any shared border between the community and the host community; and the geographic and commuting distance between the community and the host community, between the community and the gaming establishment, and between residential areas in the community and the gaming establishment. 205 CMR 125.01(2)(b)(1)

During the Commission’s deliberation on surrounding communities policies, the Commission rejected establishing a mileage based threshold for determining which communities are surrounding communities. But noted that the legislature had offered amendments on such a mileage based standard (establishing a standard of 2 miles, 3 miles or 5 miles distance from a gaming facility as determination of surrounding community status or the need for a hearing.)<sup>1</sup>

## Executive Summary

### Community Petition

Everett states that it borders Revere and that the site is a 2.5-mile drive from the shared border. Everett also states that Everett and Revere share critical roadway infrastructure and are parties to mutual aid agreements regarding police, fire, homeland security, and other public safety matters.

### Applicant Response

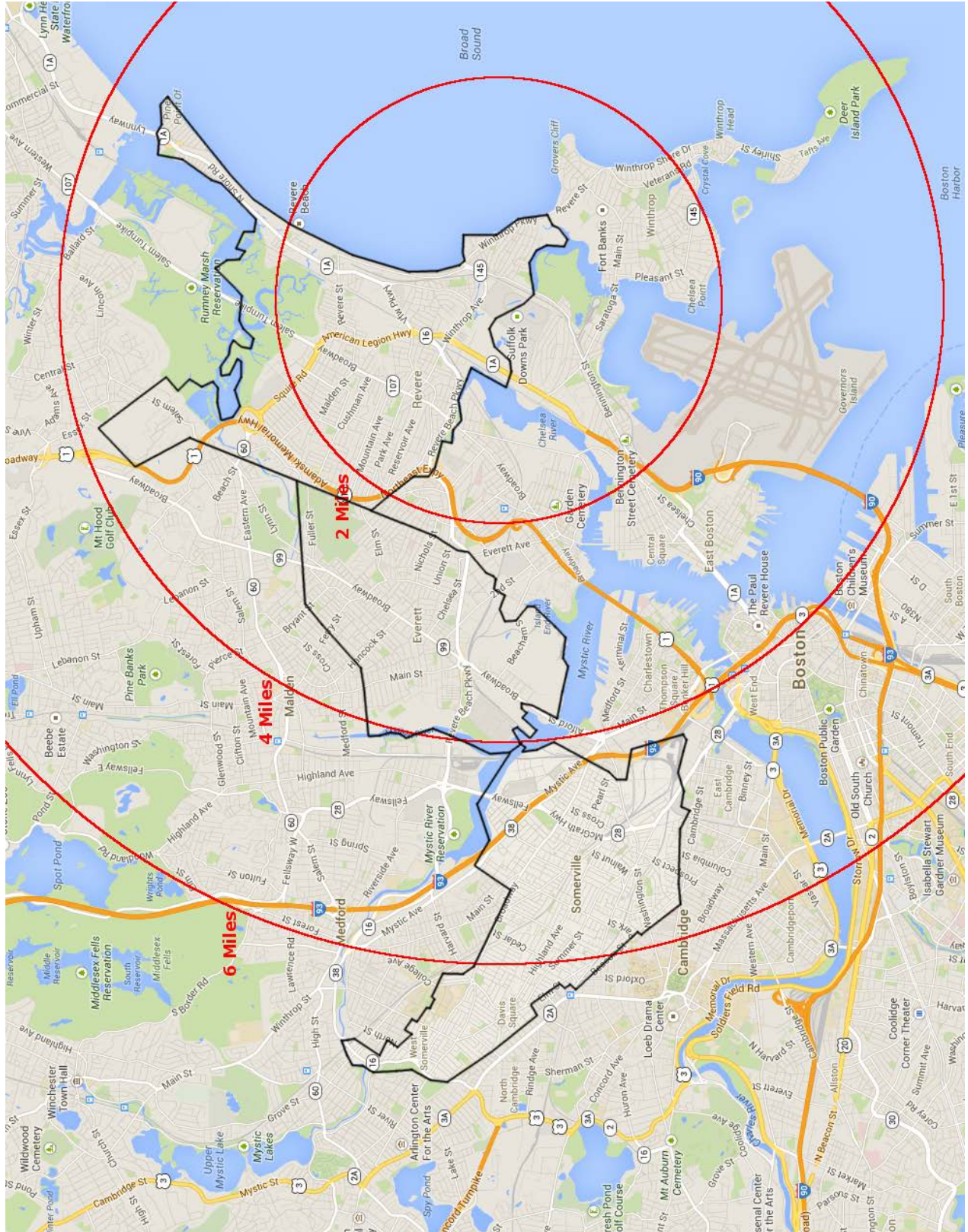
Mohegan states that Everett and Revere share a border of 0.75 mile and that the Everett boundary closest to the site is 1.7 miles away. The nearest residential neighborhood in Everett is a 6-minute drive from the site, and the Everett City Hall is a 9-minute drive.

Mohegan states that the Commission has been clear that geographic distance and/or a shared border alone is not sufficient for surrounding community designation. Mohegan states that the legislature rejected attempts to make surrounding community status turn on distance alone, and cited statements by Ombudsman Ziemba and Commissioner Crosby. Ziemba noted that Fitchburg, while proximate to the site, had a low level of “direct

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<sup>1</sup> See “Surrounding Communities Amendments” document included in December 12, 2012 Commission Meeting Packet.

connectivity in relation to traffic and access to the casino.” Crosby stated, “What the Legislature and we are concerned about is impacts....”.



## **A. COMMUNITY PETITION**

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The City of Everett is a working class city with a population of approximately 42,500. It borders both Boston (to the south) and Revere (to the east). Everett also shares critical roadway infrastructure with Revere and has mutual aid agreements with Revere regarding police, fire, homeland security and other public safety matters. (See, e.g., Exhibits O and R). The Suffolk Downs site is just 2.5 miles or less from the Everett border by car.



## B. APPLICANT RESPONSE

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The Commission has been clear: sharing a border with the host community does not alone justify designation as a surrounding community without a further demonstration of significant and adverse impacts. See Exhibit 1, Transcript p. 48, 2-5 (Mr. Ziemba explaining that while Fitchburg "is proximate to Leominster, the city's level of direct connectivity in relation to traffic and access to the casino should be considered low" and declining to designate city as a surrounding community). Here, the City generally cites its shared border with Revere and distance between the closest border edge and the MSM project site- based on an arbitrary mileage calculation - as a factor militating in favor of designation. The legislative history of the Expanded Gaming Act shows reliance on mileage is insufficient.

The legislature repeatedly rejected attempts to make surrounding community status turn on distance alone. As Chairman Crosby emphasized: "I think that's a really important point though that people need to hear that this is not about proximity alone. The mere fact of being close, is not in and of itself. What the Legislature and we are concerned about is impacts, independent." Id. at p. 14-15, 20-1.

Everett notes that its closest border point is 2.5 miles by car from the MSM project site. Other distance geography measurements are as follows, with distances determined as the crow flies:

Length of Distance with Revere	Distance from project site to municipal boundary		Distance from project site to municipal center		Distance from project site to nearest residential neighborhood	
	Miles	Driving time (min)	Miles	Driving Time (min)	Miles	Driving Time (min)
0.75	1.7	6	2.6	9	1.7	6

As shown, the municipalities share a short border of 0.75 miles. The municipal boundary closest to the project site is 1.7 miles away. The nearest residential neighborhood is a 6 minute drive from the project site, and Everett City Hall is a 9 minute drive.

### **APPLICANT RESPONSE - JANUARY 29, 2014 – COMMISSION MEETING**

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7 MR. BAKER: Thanks, Kevin. Mr.

8 Chairman, members of the Commission, let me

9 just address the six criteria that are in front

10 of you. Proximity, it is true that the two

11 communities share a border. It's a three-

12 quarter of a mile border. There aren't any

13 major roads that cut through that border

14 between the two communities. And I would

15 simply note that the fact of a border in your

16 decision as related to the two sister cities of

17 Fitchburg and Leominster are not dispositive

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**C. RPA ANALYSIS**

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No relevant documents

**D. DEIR ANALYSIS**

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No relevant documents

**E. CONSULTANT ANALYSIS**

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No relevant documents

**F. APPLICATION**

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No relevant documents

**G. OTHER**

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## 2. INFRASTRUCTURE

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### Legal Framework

In determining whether a community is a surrounding community, the commission . . . will evaluate whether: . . . The transportation infrastructure in the community will be significantly and adversely affected by the gaming establishment, taking into account such factors as ready access between the community and the gaming establishment; projected changes in level of service at identified intersections; increased volume of trips on local streets; anticipated degradation of infrastructure from additional trips to and from a gaming establishment; adverse impacts on transit ridership and station parking impacts; significant projected vehicle trip generation weekdays and weekends for a 24 hour period; and peak vehicle trips generated on state and federal roadways within the community. 205 CMR 125.01(2)(b)(2)

### Executive Summary

#### Community Petition

Everett argues that [N]umerous local roads provide ready access across the Everett/Revere border and to the project site. Even more significant, however, is the fact that two major routes commonly used to avoid the limited-access highway system-Route 16 and Route 99 – traverse Everett. These two roads intersect at Sweetser Circle, a high-traffic and high crash rotary, before Route 16 (also known as the Revere Beach Parkway) continues eastbound, providing direct access to Revere and the Suffolk Downs property, located approximately 2.5 miles from the Everett line, at the intersection of Route 16 and Route 1A.

Everett also stated that “Route 99 is entirely maintained by the City of Everett. Though Route 16, including Sweetser and Santilli Circles, is ostensibly under the control of the state Department of Conservation and Recreation ("DCR"), DCR performs very little maintenance on that road, and such maintenance (as well as public safety response) in actuality falls to Everett. Mohegan has acknowledged that "Route 16 is the corridor expected to carry regional (external) Resort trips to and from the west." Exhibit F, §5-17-01, p.2.

Patrons or employees of the proposed Mohegan facility traveling from metro-north and northwestern communities (such as Arlington, Burlington, Malden, Medford, Somerville, Winchester and Woburn), as well as from points north via I-93 (such as Manchester, NH) and Route 3 (such as Lowell), and from central and western Massachusetts via Route 2, and anyone seeking to avoid I-93 (which is more circuitous and frequently gridlocked, particularly at peak hours and on weekend evenings) are expected to routinely use Route 16 to access the Mohegan project. Indeed, internet mapping systems automatically route

drivers bound for Suffolk Downs from each of those locations (and many more) through Everett on Route 16. (E.g., Google Map directions, attached as Exhibits J-1 through J-10).<sup>6</sup>

In its initial Infrastructure Improvements Plan presentation (attached as Exhibit K), prepared by Vanasse Hangen Brustlin, Inc. ("VHB"), Suffolk indicated that 7 percent of approaching traffic and 17 percent of departing traffic would arrive at the original Suffolk Downs resort site via Route 16 through Everett. (Exhibit K, p.3).

...Route 16 through Everett is clearly going to be a routine cut-through for patrons and employees of the facility....

Moreover, the regional planning agency ("RPA") that serves both Everett and Revere, the Metropolitan Area Planning Council ("MAPC"), in reviewing the East Boston proposal, specifically found that "the Proponent has underestimated the number of trips on Route 16 and should reevaluate the trip assignment and distribution assumptions." MAPC explicitly identified "Route 16 and Route 99 (Broadway) in Everett" as an intersection requiring specific impact analysis....

VHB claims there will be no significant and adverse impact on Everett, because the project will produce only "226 and 312 vehicle trips west and east of Route 99, respectively" along Route 16, representing increased traffic volumes of 4% and 6%, respectively.

- Even the underestimated number of vehicle trips acknowledged by VHB is far greater than the number of vehicle trips deemed by the Commission, other applicants, and even Mohegan itself, to support the designation of various towns as Surrounding Communities to other projects
- VHB's peak-hour trip estimates represent a 4 percent increase in traffic along Route 16 in Everett west of Route 99 and a 6 percent increase east of Route 99. This is a significant increase in traffic during an already congested time period on already congested roads.

In its presentation, Everett (Mr. Fitzgerald) argued that Route 16 is one minute slower without any delays. When you compare the 93 Route 1 alternative versus the Route 16 alternative, Route 16 is three miles shorter but takes one minute longer without any traffic. The lower deck along the Expressway is severe traffic. So, that would take longer to travel through 93 South waiting to get onto Route 1A northbound approaching when trying to get to the casino during Friday evening.

The Mohegan Project Will Produce Approximately One Million New Vehicle Trips Per Year Through Everett. <sup>1</sup>

This equates to 993,211 trips per year-nearly one million vehicle trips-traveling on a road that Everett maintains and for which it provides emergency services.

According to VHB, traffic on Route 16 west of Route 99 would increase by 4% as a result of these additional trips, and traffic east of Route 99 would increase by 6%, all on a road that was designed as a parkway and has at least 14 local feeder streets (and dozens of residential and commercial driveways) that access it in Everett.

In its RFA-2 submission (5-33-06), Mohegan indicates that the Average Daily Trips (ADT) generated by the Project will be 21,769. This will result in annual trip generation of approximately 7,945,685 vehicles. Mohegan's own trip distribution estimates (which, as previously noted, both the City and the Metropolitan Area Planning Commission believe are understated) indicate that 7% of inbound project trips and 18% of outbound project trips will travel through Everett on Route 16.<sup>2</sup> Thus, by Mohegan's own estimation, a total of 12.5% of all project trips will travel through Everett.

VHB has testified that operations along the Route 16 corridor can accommodate additional casino traffic without mitigation despite never performing any traffic evaluations. Traffic signal timings currently favor the Route 16 corridor by sacrificing operations along the intersecting roadways including critical arterials serving the City of Everett. Based on the Wynn DEIR, projected 2023 conditions indicate failing operations and severe queues at intersecting approaches of five of the six signalized intersections analyzed during peak periods as well as at Santilli and Sweetser Circles. (The sixth signalized intersection consists of a one-way roadway departing Route 16 and therefore no delay is experienced from side streets.) VHB is mistaking this as unused capacity that casino trips can utilize without recognizing the already detrimental queues and delays experienced along each of the intersecting roadways.

In addition to the signalized intersections, there are many unsignalized approaching roadways and commercial driveways (serving Everett residents and businesses) that depend on gaps in traffic to access Route 16. Additional traffic along Route 16 will reduce these gaps thereby making turns into the stream of Route 16 traffic even more challenging and increasing the likelihood of angle crashes as driver frustration increases.

Even apart from the traffic concerns that would result from such a volume of additional vehicle trips (particularly during peak traffic conditions on Friday and Saturday afternoons/evenings, when traffic on Route 16 is heaviest and when casino patrons and employees are even more likely to use Route 16 as a cut-through to avoid entering and exiting Boston to access the Project via I-93 and the Callahan Tunnel), the wear and tear on the roadway, increased likelihood of traffic accidents and other public safety events, and problems experienced by Everett business owners and other

landowners along Route 16 as a result of one million additional vehicles traveling through Everett clearly supports Everett's request for designation as a Surrounding Community.

### Applicant Response

The City cannot demonstrate that its transportation infrastructure will be significantly and adversely affected by the development of the gaming establishment....

...Sterling Suffolk had proposed a gaming establishment at Suffolk Downs with 6,000 gaming positions, and the traffic information in its September 2013 DEIR reflected that number of positions. MSM's proposal has reduced the number of gaming positions to 5,000- one thousand fewer than the prior proposed project....

...This *17% reduction* in gaming positions will proportionally decrease the number of vehicle trips generated by the gaming establishment, thus greatly mitigating the overall impact on transportation infrastructure in the City (to the extent there are any impacts, at all) and the entire region. Id. Based on this reduction in gaming positions, MSM now projects 2,419 fewer weekly resort-generated daily vehicle trips. ....

As with all regional facilities, the vast majority of trips will be primarily on the regional roadway system, owned principally by the Massachusetts Department of Transportation or the Commonwealth of Massachusetts (Department of Conservation and Recreation), and not on roads that are owned or maintained by the City....

In its presentation, Mohegan Sun notes that both the current project in the Mohegan Sun frame and the Suffolk project have regular and frequent meetings with both DOT and DCR. Mohegan noted that it has addressed with them the impacts that we have on every intersection in the area including all of the DCR roads and the issues raised by Everett have simply not come up in any of those meetings. Mohegan noted that it has spent a lot of time with DCR on meetings about this project, because one of the important regional improvements that the project is going to pay for is a fix of Route 1 and 16, which actually will have a lot of benefits for residents of Everett.

Mohegan also expressed a willingness to make signal timing changes, that that's all that it is, that it can be done by a contractor, that is it something that gets carried to DCR with a request for a change, and that it can be implemented for under \$2500.

In addressing Everett's criticisms that Mohegan Sun's estimates for traffic through Everett are too low, Mohegan Sun noted that "[t]he resulting Route 16 assignment is seven (7) percent of the total vehicle traffic destined to the MSM Revere site. The reasoning on the destination (inbound) volume was based on several factors including:

- a) the distance travelled between the Route 16 off-ramp from 1-93 southbound to the Leverett off-ramps is less than two-miles with car-pool lane access available.
- b) the Callahan Tunnel is operating below capacity during the Friday evening peak. Even with the addition of general traffic demands associated with already defined growth due to developments, general background growth and the added traffic associated with the MSM Resort in Revere, the projected demand of 2600 to 2700 vehicles per hour is well within the Tunnel's capacity of 3500 vehicles per hour.
- c) there is only one traffic signal on this route. While this signal operates poorly today due to demands in the Route 1A corridor, upgrades proposed as part of the MSM Revere project, will significantly improve its operations.

Therefore, it can be concluded that the Callahan tunnel route is considerable more expedient than the "congested" Route 16 corridor with 15 and 20 traffic signals between the Route 16 exit from 1-93 south and the entrance to the site at the Winthrop Avenue/ North Shore Road intersection.

The trip generation and distribution patterns discussed in the DEIR and RFA-2 application have been vetted through a series of meetings with and submissions to the Massachusetts Department of Transportation, as well as through past and current host communities and their consultants.

The [then] upcoming Notice of Project Change filing will include several significant project changes as included in the RFA-2 gaming license application, one of which will be a downsizing of the number of gaming positions from 6,000 identified in the DEIR to 5,000 with the new development program.

Based on the reduction in gaming positions, it is anticipated that the number of site-related automobile trips will decrease by approximately 17% from the totals reported in the DEIR.

The MSM Resort's peak generation period will occur after the peak hours on weekdays. The highest anticipated arrival hour is expected between 7 PM and 8 PM with 8.4% of the total daily entering trips anticipated together with 7.3% of the exiting trips. During the roadway network traffic peak hours in the vicinity of the site (4:30 to 5:30 PM), we anticipate approximately 6.4% of the entering trips to occur with 5.7% of the leaving trips. These factors have led to the identification of the Friday evening street peak hour (4:30 to 5:30 PM) to be the design hour for the MSM Resort in terms of trip generation. Further, based upon an extensive mode share analysis approved by MassDOT, it is projected that approximately 85% of the patron mode share will be either private auto or

taxi with approximately 10 – 11% by public transit and 5 percent in private buses/coaches.

The projected demand detailed in the DEIR and the RFA-2 package indicated that the projected added volume to the eastbound Route 16 corridor totaling approximately 65 vehicles approaching Webster Street and Garfield Avenue, east of the Everett City Line, in Chelsea. This demand not only includes trips added from points west of I-93 and from the I-93 corridor itself, but also local trips from the municipalities between I-93 and Route 1. This demand is being added to the higher direction of evening peak hour flow in a three lane eastbound corridor and will have little or no impact on the corridor's operation. The added demand in the peak direction in this DCR corridor will represent an increase of approximately 4% approaching the Garfield/Webster intersection. This is considerably less than the demand associated with the current detour routing associated with the Callahan Tunnel through the area which has effectively been managed with minor signal timing and system adjustments.

The impact of the assumption during the evening peak, adds 130 to 150 vehicles to the westbound corridor during the evening peak hour, the higher number west of the Garfield Street intersection and the lower number approaching the I-93 corridor. While this represents an increase of approximately eight (8%) percent immediately west of Webster Street/Garfield Street, it is in the lower volume direction during the evening peak and consequently will not impact general operation in the corridor nor side street movement at signalized intersections within the corridor.

At the mentioned Sweetser Circle, referred to in both the petition and the MAPC comment letter provided within the Exhibits, the impact of the MSM Resort is expected to be minimal. The Route 99 corridor is not considered a regional feeder to the MSM Resort site in Revere and added demand in the corridor will be limited to the demand associated with local Everett trips, and possibly from the southern portion of Malden, to the Revere site.

The petition also identified that "...no traffic analyses were performed along Route 16 in the City of Everett, while several intersections along Route 1A and Route 107, each carrying only 2 percent of the project generated trips were analyzed within the City of Revere." ....[T]he MEPA Certificate issued on the Draft identified no need to expand the study locations beyond those initially designated in the ENF process.

[The] additional demand associated with the trip generation, distribution and assignment will have little or no impact on the operation of roadways in the City of Everett, including, but not limited to, Broadway (Route 99), Main Street, or Route 16, a DCR controlled six lane divided corridor.



## RPA Analysis

MAPC sent a letter of support to the MGC for the City of Everett's surrounding community petition. MAPC noted that its support for this requested designation "is based on our understanding of the project's potential off-site traffic impacts on the City of Everett. MAPC conducted a thorough review of the MEPA filings for the proposed Suffolk Downs casino in Revere and East Boston. In our comments on the Environmental Impact Report, MAPC concluded that "the Proponent has underestimated the number of trips on Route 16 and should reevaluate the trip assignment and distribution assumptions. The Proponent should continue to work with MassDOT and the Department of Conservation and Recreation to determine the potential traffic impacts along Route 16, and include an analysis" of impacted intersections. MAPC specifically identified Route 16 and Route 99 in Everett as one of the potentially impacted intersections, and recommended that significant off-site transportation improvements should include improvements along Route 16.

### **From 3/7/2014 letter from Metropolitan Area Planning Council (MAPC) re: Mohegan Sun Massachusetts, Notice of Project Change, MEPA #15006**

"...Even though the proposed project has been reduced in size compared to the previously proposed project, it will still have a significant impact. It is critical that the Final Environmental Impact Report (FEIR) comprehensively address the tasks previously delineated in the existing scope in addition to the modifications identified in the NPC. In particular, MAPC identified regional traffic impacts, mode share goals, stormwater, and water conservation in our comments on the Draft Environmental Impact Report (DEIR), which we believe must still be addressed in the FEIR."

## DEIR Analysis

### SUFFOLK DOWNS DEIR CERTIFICATE

As noted by Mohegan Sun, "[n]o Everett intersections were analyzed as part of the Revere DEIR because no intersections were identified in the MEPA scope for the project, which was based on input from MassDOT, DCR and communities that commented on the ENF filed for the project.

The EOEEA DEIR Certificate stated that "[t]he project requires extensive modifications to the regional and local roadway network. While the DEIR included a comprehensive Transportation Study, additional data gathering, analysis and assessment of alternatives and mitigation measures is necessary in the FEIR. Some commenters have requested an expansion of the Transportation Study Area beyond that presented in the DEIR. The DEIR Study Area was expanded in response to comments on the ENF and developed in consultation with State Agencies and Host and Surrounding Communities. Additional expansion of the Study Area does not appear warranted at this time. The Proponent should meet with MassDOT, Massport, BID, and DCR prior to commencing the revised Transportation Study to ensure completion of an analysis that sufficiently addresses the items in this Scope."

### DCR COMMENT LETTER ON SUFFOLK DOWNS DEIR

[DCR did not make specific comments about Everett in its comments on Suffolk Down's ENF but indicated regional traffic concerns. It stated that "[a]s part of the Project, the Proponent plans to construct a rampway that would improve access between Route 1 and Revere Beach Parkway with the stated goal of addressing existing capacity issues on Route 60 in Revere. As part of the EIR, DCR requests the Proponent demonstrate the impact of the improvement on Revere Beach Parkway by

estimating vehicle trips with and without the proposed improvement. This analysis should calculate the net difference of regional vehicle trips that will use Revere Beach Parkway with and without the improvement. Similarly, DCR requests the Proponent estimate the anticipated increase of vehicle trips generated by the Project. This information will help DCR assess the anticipated net increase of traffic on Revere Beach Parkway resulting from the proposed rampway.

DCR COMMENT LETTER ON MOHEGAN SUN NPC

From 3/14/2014 Comment Letter from DCR

RE: EOEEA #15006 Mohegan Sun Massachusetts Notice of Project Change (NPC)

“DCR anticipates the change will increase Project-generated access/egress traffic at intersections under DCR jurisdiction, including the Revere Beach Parkway/Tomesello Way intersection. DCR requests that in its Final EIR, the Proponent revise the traffic distribution percentages to reflect the site location change. DCR also requests that the Proponent reanalyze impacts to DCR intersections and equipment (traffic signals) based on the new trip distribution numbers, and propose mitigation if impacts are unavoidable.

“DCR also requests that the Proponent quantify traffic added to Revere Beach Parkway as a result of proposed Rte. 1 interchange improvements, both from regional traffic diverted from the Rte. 60 corridor, and from Project-generated new trips.”

**3/6/2014 – Comment letter from City of Everett re: Mohegan Sun Massachusetts NPC (EE #15006)**

“...While this new development is described only conceptually within Mohegan's NPC, it is abundantly clear from the limited information offered that this is a dramatically different project than was evaluated in the previous applicant's DEIR. The new development proposes to locate a casino, hotel and retail project on a different site, relocate to Boston all horse-related structures currently located in Revere, use a different access point from the state highway system and different municipal water/sewer system, and relies on a different primary MBTA station to access public transit.

“...Our evaluation was submitted to the Gaming Commission as part of the City's petition to be considered a "surrounding community" as defined by the Expanded Gaming Act. That application and supplements are attached hereto as **Exhibit A** for your review and outline expected impacts to the City of Everett by Mohegan. This application and supplements begin to illustrate the breadth of impacts to the surrounding area and the critical need that an opportunity is provided through the MEPA process to meaningfully consider potential impacts through a Draft EIR and the public comment process.”

MASSDOT COMMENT LETTER

*[MassDOT's comment letter does not specifically address intersections in Everett.]*

Consultant Analysis

DEWBERRY ENGINEERS, INC.

The applicant submitted a traffic report prepared by Vanasse Hangen Brustlin, Inc. (VHB) as part of their Draft Environmental Impact Report (DEIR) issued on September 3, 2013. We note that the current scope of the project has been changed and reduced since the original project DEIR and the Environmental Notification Form (ENF) were submitted per the Massachusetts Environmental Policy Act (MEPA).

The Notice of Project Change (NPC) was submitted by MSM to Office of Energy and Environment (EEA) on January 31, 2014. The NPC noted that the number of gaming positions would be 5,000, compared to the original 6,000 positions in the Caesars Resort proposal. This reduction in gaming positions translates to a lower number of project-generated trips compared to the original proposal. Without presenting a revised traffic study due to the reduction, MSM has indicated that using the traffic numbers and analyses in the DEIR for purposes of evaluating the current proposal would yield overly conservative estimates of project traffic volumes and project traffic impacts. They added that the traffic analysis will be updated in the EIR. We note that, based on these developments, the Dewberry evaluation will be based on the DEIR traffic section and references, which are based on the higher 6,000 gaming positions.

<b>Trip Distribution of Project Vehicle Trips (Everett)</b>	<b>Route 16</b> (vic. Sweetser Circle)	
	Inbound (to	Outbound (from
<b>Patrons</b>	7%	18%
<b>Employees</b>	8%	11%

<b>Number of Project Vehicle Trips (Everett Friday)</b>	<b>Route 16</b> (vic. Sweetser Circle)	
	Inbound (to Project)	Outbound (from Project)
<b>Patrons</b>	64 VPH	152 VPH
<b>Employees</b>	4 VPH	7 VPH

Aside from the MSM-associated trips on Route 16 at the Route 99 junction, the DEIR did not present any further data indicating that MSM-generated trips would travel on local streets in Everett.

**MAPC, MassDOT and EEA Comments**

Documents submitted by the Metropolitan Area Planning Council (MAPC), MassDOT and the Office of Energy and Environmental Affairs (EEA) relating to the DEIR were reviewed for comments or concerns vis-à-vis traffic impacts on Everett local roads.

The MAPC document cited concerns about the DEIR's assessment of regional traffic impacts and mode share goals. Specific to Route 16, MAPC believes that the DEIR has underestimated the number of MSM trips that will use Route 16 and recommends that this aspect be re-evaluated with MassDOT and DCR. They recommended that the Route 16/Route 99 (Broadway) intersection in Everett be added to intersections that should be analyzed under this project.

MassDOT comments acknowledged the fact that MSM addressed prior MassDOT concerns regarding the project's trip distributions and assignments. They expressed agreement with the project's approach to distributing and assigning trips onto the road and transit networks. They recommended that some intersection analyses be revised to better replicate actual field conditions as well as for providing better traffic data on, and highway analyses for, the various tunnels under Boston Harbor. They stated a preference for routing MSM-generated traffic, having origins to the north and west, onto Route 16 in lieu of accommodating them on Route 60. To this end, they stated that additional improvements may be required at the Route 16/Route 1A and Route 16/Route 145 interchanges, and for MSM to discuss these improvement plans with the DCR. MassDOT's March 17, 2013 response to the NPC includes a recommendation for MSM to revise the trip generation, distribution and assignment numbers to update them based on the current project proposal.

The EEA comments did not refer to any intersection in Everett that would require analysis.

Adding the east-west MSM trips would increase Route 16 volumes, which would require more traffic signal green time to maintain existing levels of service for Route 16. Such re-allocation of signal green times (in favor of Route 16) would result in poorer LOSs—i.e. higher vehicle delays and longer queues--on left-turn and side street movements. If no adjustment is implemented, then the level of service on Route 16 can be expected to operate worse than the base condition.

A January 22, 2014 memorandum prepared by VHB in support of the project's Notice of Project Change (NPC) extended the distribution and assignment of MSM trips beyond the limits specified in the DEIR. Exhibit C from the memorandum shows, for a Friday evening peak hour, that the project will add 145 VPH to Route 16 westbound and 60 VPH to Route 16 eastbound, for the segment of Route 16 west of Route 99. For the segment of Route 16 east of Route 99, the comparable numbers are 148 VPH westbound and 66 VPH eastbound. These added volumes amount to a 4% increase in Route 16 volumes west of Route 99 and a 6% increase in Route 16 volumes east of Route 99, according to Exhibit D from the same VHB memorandum.

To determine the extent by which the additional MSM-generated traffic will degrade traffic performance at the Route 16 intersections in Everett, a more detailed traffic analysis would have

to be completed. The resulting impacts could be worse if a re-calculation of the trip distribution, as sought by MAPC, shows that Route 16 would actually serve more MSM patrons and employees than currently presented. Related trip distribution changes could also occur under the MassDOT expectation that improvements to the Route 16/Route 1A interchange would encourage more trips to use Route 16 instead of Route 60.

Per attachment L “Draft Construction Management Plan” of the DEIR, the applicant expects that construction vehicles will enter the site from Route 1A at Tomasello Drive. Aside from this reference, the DEIR does not mention what routes the construction vehicles will take to get to or from Route 1A/Tomasello Drive. Such routing will depend on where the sources of construction materials are located--information that is not available in the documents we reviewed. It is expected that truck traffic will average 15-20 trucks per day, spread evenly over the course of a typical day. Based on the location of the project site within the region however, it is likely that construction vehicles would keep to the interstates (I-90, I-93 and corresponding tunnels) and major highways, including Route 1 and Route 16. Route 16 may be a preferred route for commercial operators who choose to avoid paying the \$7.50 toll on the Callahan Tunnel. Based on the anticipated 15-20 trucks per day which have access to and from the site via several major highways, we do not expect that Route 16 in Everett will be significantly affected under this impact factor.

Per attachment L “Draft Construction Management Plan” of the DEIR, the applicant expects that construction vehicles will enter the site from Route 1A at Tomasello Drive. Aside from this reference, the DEIR does not mention what routes the construction vehicles will take to get to or from Route 1A/Tomasello Drive. Such routing will depend on where the sources of construction materials are located--information that is not available in the documents we reviewed. It is expected that truck traffic will average 15-20 trucks per day, spread evenly over the course of a typical day. Based on the location of the project site within the region however, it is likely that construction vehicles would keep to the interstates (I-90, I-93 and corresponding tunnels) and major highways, including Route 1 and Route 16. Route 16 may be a preferred route for commercial operators who choose to avoid paying the \$7.50 toll on the Callahan Tunnel. Based on the anticipated 15-20 trucks per day which have access to and from the site via several major highways, we do not expect that Route 16 in Everett will be significantly affected under this impact factor.

In light of the above, project impacts on Everett transit ridership and parking facilities are expected to be minimal.

The DEIR indicates that the project will generate 24,286 vehicles (2-way, *i.e. inbound and outbound*) on an average day, 30,000 vehicles per day for a typical Friday and 33,487 vehicles per day for a typical Saturday. Seven percent of these daily totals will travel eastbound on Route

16 and 18% westbound. As was noted above under the Level of Service impact factor, we believe these project-generated trips will have a significant and adverse impact on Route 16 traffic conditions.

The trip distribution and assignment for a Friday peak hour under the MSM development indicate that approximately 68 more vehicles would be added to Route 16 eastbound and approximately 159 more vehicles to Route 16 westbound. These volumes will be added to several intersections on Route 16 in Everett that are expected to operate at poor levels of service in year 2022. To determine the extent by which the additional MSM-generated traffic will degrade traffic performance at the Route 16 intersections, a more detailed traffic analysis would have to be completed.

Based on our review of traffic data and related documents, we find that the project-generated trips will have a significant and adverse impact on Route 16 within Everett. We therefore recommend that Everett be designated as a Surrounding Community to the MSM-Revere development proposal, based on the transportation and traffic impact factors cited in Regulation 250 CMR 125.00.

Application

See Referenced Sections.

## A. COMMUNITY PETITION

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Despite this finding by Suffolk's consultant, no traffic analyses were performed along Route 16 in the City of Everett, while several intersections along Route 1A and Route 107, each carrying only 2 percent of project-generated trips, were analyzed within the City of Revere (See Exhibit K, p.4).

It is anticipated that Mohegan will argue that most drivers visiting the project from the west and northwest will travel south on I-93 and then backtrack north on Route 1, thereby avoiding Everett. This is simply not a tenable argument. Anyone, who has sat in gridlocked traffic on I-93 coming into Boston on a Friday evening, knows that drivers will always look for ways to avoid that highway. Additionally, taxis traveling between Logan Airport and Boston proper frequently use Route 16 and other surface streets in Everett as cut-through routes to avoid tolls in the Harbor tunnels and on the Tobin Bridge; it must be assumed that taxis bringing patrons to the Mohegan facility would do the same. As noted above, the now-defunct East Boston proposal estimated that 7 percent of approaching trips and 17 percent of departing trips would use Route 16 through Everett.

(MAPC Comment Memorandum, Oct. 11, 2013, attached as Exhibit L) [emphasis added].<sup>7</sup> Therefore, the already substantial percentage of project trips acknowledged by Suffolk's own consultant as traveling through Everett was deemed to be too low by the MAPC. Importantly, MAPC has issued a letter supporting Everett's petition for designation as a Surrounding Community to the Mohegan project. (Attached as Exhibit M)

In addition Route 16 is the most obvious cut-through to avoid the Callahan Tunnel, which is frequently at a standstill, and the Sumner Tunnel, which requires a substantial toll. This is demonstrated by the fact that the state Department of Transportation ("MassDOT") itself is detouring vehicles traveling to East Boston and Logan Airport through Everett along Route 16, while the Callahan Tunnel is under construction. (MassDOT Detour Advisory and Map, attached as Exhibit N).

In a December 30, 2013 memorandum (attached as Exhibit O), provided to Everett for the first time as an attachment to Mr. Tuttle's January 7, 2014 letter, . The following should be noted:

- VHB provides no basis or methodology for reaching these conclusions;
- Both MAPC and Everett's traffic consultant WorldTech have concluded that these numbers are underestimated;
  - o The Commission designated the Town of Bolton as a Surrounding Community to the Category 2 proposal in Leominster, where its consultant found that peak hour traffic could be as high as 100-150 trips on Route 117, which would be "significant" (Surrounding Community Petition Analysis for Town of Bolton, dated Nov. 20, 2013, p.13-14);
  - o Greenman-Pedersen, Inc. ("GPI"), the independent traffic consultant retained by the Pioneer Valley Planning Commission ("PVPC") pursuant to this Commission's RPA process, stated that "the Town of West Springfield is considered the most heavily

- impacted [community] in relation to traffic" generated by the MGM Category 1 proposal in Springfield, based upon its determination that "approximately 135 trips are expected to utilize roadways in Town during the Friday evening commuting hour." (Exhibits, p.27). This conclusion caused MGM to make West Springfield the only community it voluntarily designated as a Surrounding Community without first executing a Surrounding Community Agreement.
- o Mohegan itself designated six towns as Surrounding Communities to its Category 1 proposal in Palmer, where its analysis for traffic generated by that project through those towns only ranged from less than 10 to 112 Friday peak-hour trips. (Exhibit T, p.7)--i.e. one-tenth to one-third of the trips through Everett that Suffolk acknowledges will be generated by the Mohegan proposal.
  - VHB claims that trips generated from within Everett would be dispersed enough over the local roadway to be negligible and that Route 99 would not attract external trips. This argument is unfounded. Local trips from within Everett (and, based on Google Maps directions to Suffolk Downs, a significant portion of Malden) would be channelized into already-congested arterials in Everett, including Route 99 (Broadway), Main Street, and Ferry Street, to access Route 16. Based on the gravity model used for the Wynn resort in Everett, 3.7 percent of patrons are anticipated to come from Everett and Malden. Although no data has been provided to enable Everett's traffic consultant to determine the trip distribution for the Mohegan project, it is reasonable to assume it will be similar based on the site's proximity to Everett. This is a significant portion of project-related traffic that will feed into Everett's local street network. In fact, VHB notes a discrepancy of 86 peak-hour trips along Route 16 crossing Route 99, indicating that approximately 27.5 percent of the project generated trips assigned to Route 16 are turning off at Route 99, likely either via Sweetser Circle or Second Street.

It is simply not credible, therefore, for Mohegan to suggest that Everett will not be significantly and adversely impacted by the Revere project. Accordingly, Everett respectfully requests that its Petition be approved and that the Commission designate it a Surrounding Community.

**LETTER TO STEPHEN CROSBY 2/12/2014 FROM JONATHAN SILVERSTEIN OF KOPELMAN AND PAIGE, P.C.**

In its RFA-2 submission (5-33-06), Mohegan indicates that the Average Daily Trips (ADT) generated by the Project will be 21,769. This will result in annual trip generation of approximately 7,945,685 vehicles. Mohegan's own trip distribution estimates (which, as previously noted, both the City and the Metropolitan Area Planning Commission believe are understated) indicate that 7% of inbound project trips and 18% of outbound project trips will travel through Everett on Route 16.<sup>2</sup>

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<sup>1</sup> The arguments set forth herein are further supported by the Second Affidavit of James D. Fitzgerald, P.E., LEED AP, attached hereto as Exhibit 1.

<sup>2</sup> As both Everett's traffic consultant WorldTech Engineering and the Metropolitan Area Planning Commission, the Regional Planning Agency for both Everett and Revere, have both opined, Mohegan's already substantial traffic estimates for Route 16 in Everett are understated. It is noteworthy that signage along 1-93 directs those seeking to travel to Revere to use Exit 31 (Route 16 to "Everett" and "Revere"). Indeed, in the one mile leading up to Exit 31 along 1-93 South, three separate signs indicate that Route 16 provides access to Everett and Revere, which as previously noted is a 3-mile shorter route than continuing along 1-93 into Boston, and up through the Callahan Tunnel, past Logan Airport and into Revere. The Callahan Tunnel exit contains no similar signage to Revere.

These percentage increases will be higher on Fridays and Saturdays, when project traffic will be highest. Furthermore, six intersections along the Route 16 corridor in Everett - Santilli Circle, Sweetser Circle, and the intersections with Lewis Street, Second Street, Vine Street, and Everett Avenue- are identified by MassDOT as high crash locations based on 2009 to 2011 data (the latest three years of crash data available). (See Exhibit 2)

In fact, the proposed resort at Suffolk Downs would generate more peak hour traffic along Route 16 westbound than the proposed Wynn resort in Everett, yet Wynn has committed in its Host Community Agreement to provide off-site improvements at two heavily congested locations along Route 16 in Everett, Santilli Circle and Sweetser Circle, at a minimum. Although mitigation for the Wynn resort is still being finalized, and contrary to claims made by Mohegan's representatives, mitigation as substantial as a raised interchange is being considered to accommodate the Wynn site-generated traffic, which as previously noted would be lower than that generated by Mohegan.

Along Santilli Circle in particular, VHB has claimed that Route 16 flows with minimal delay without providing any supporting analysis. In fact, the approaches to Route 16 at the different nodes of this complex signalized circle actually fail during peak periods analyzed. These approaches are not side streets but provide the circular movement through the location to maintain regional connectivity. Queues along these approaches have significant impacts on the mainline Route 16 operations. Again, adding more vehicles to the Route 16 corridor is likely to have significant adverse effects. To suggest otherwise without traffic evaluations (as VHB has) is irresponsible.

### **JANUARY 29, 2014 – EVERETT COMMENTS ON TRANSPORTATION INFRASTRUCTURE**

Pge. 4

17 MR. SILVERSTEIN: Good morning, Mr.

18 Chairman and members of the Commission. It's a

19 pleasure to be before you again.

20 Jonathan Silverstein for the city of

21 Everett. With me is James Fitzgerald a

22 principle of WorldTech Engineering as well as

23 James Errickson, the Executive Director of

24 Planning and Development for the city of

Pge. 5

1 Everett.

2 Members of the Commission, the city

3 of Everett is an adjoining community to the

4 applicant host community of Revere. It is

5 adjoined directly by infrastructure, roadway

6 infrastructure to the host community site,

7 which is directly on Route 16, also known as  
 8 the Revere Beach Parkway.  
 9 And I submit the Revere Beach  
 10 Parkway in Everett is known as the Revere Beach  
 11 Parkway for a reason; it's because it provides  
 12 direct access to the Revere Beach, which I  
 13 believe Mr. Etes during his presentation to  
 14 Commission a week or so ago said that some of  
 15 his hotel rooms were going to have a view of  
 16 and Mr. Wynn described the duck boat tour that  
 17 could get there.  
 18 If we could go to the first slide.  
 19 This is a slide from the presentation that VHB,  
 20 the applicant's engineer gave some time ago  
 21 with respect to the project. You'll see that  
 22 Everett adjoins Revere. You see Route 16 right  
 23 there providing direct access to the site.  
 24 The slide indicates that seven  
 Pge.6  
 1 percent of inbound and 17 percent of outbound  
 2 trips are going to be using Route 16. The  
 3 applicant has since revised that to be 18  
 4 percent of outbound trips. The regional  
 5 planning agency which the applicant declined to  
 6 engage in a regional approach to impact  
 7 analysis very directly and definitively  
 8 determined that those trip estimates  
 9 significant in and of themselves are  
 10 understated in that a substantially higher  
 11 proportion of traffic to the site, and I think  
 12 some of the Commissioners expressed this  
 13 yesterday, as a matter of common sense, a much  
 14 higher percentage of trips to the Suffolk Downs  
 15 site will be using Route 16 and coming directly  
 16 through Everett.  
 17 If we go to the next slide, you'll  
 18 see why. In order to use the primary route  
 19 that the applicant submits trips will take from  
 20 the Metro-west, Northwest and North, someone  
 21 approaching the site would have to instead of  
 22 cutting directly over and the most direct  
 23 route, they would have to choose to go through  
 24 Boston, because everyone knows that Boston has  
 Pge. 7  
 1 no traffic, and they would have to choose to go  
 2 through the Callahan Tunnel to come back up  
 3 through a much less direct route, much more  
 4 circuitous, much more high probability of  
 5 traffic tie ups. And anyone who has tried to  
 6 go to Logan Airport knows that that is not  
 7 going to be the preferred route for most

8 individuals.  
 9 And for that reason, we can just  
 10 quickly run through some of the additional  
 11 sites. This was Exhibit J1 through J10 of my  
 12 petition. If we could just briefly run through  
 13 the next several slides, you'll see that  
 14 whether you're coming from Burlington, Lowell,  
 15 Malden, Medford, Nashua, New Hampshire, it's  
 16 clearly going to be a preferred route for you  
 17 to take, to take Route 16 through Everett, the  
 18 Revere Beach Parkway to get to the Revere host  
 19 community site.  
 20 As I indicated, the regional  
 21 planning agency, MAPC, determined that the  
 22 applicant's own numbers significant in and of  
 23 themselves are understated. The city's own  
 24 consulting engineer, WorldTech has similarly  
 Pge. 8  
 1 concluded that those numbers are understated.  
 2 One thing I do want to one point out  
 3 is you look at the mileage count, I do want to  
 4 point out that with a revised proposal, this is  
 5 about a mile that with the original proposal  
 6 someone coming in on Route 16 would have had to  
 7 go south on 1A for about a mile, pull a U-turn  
 8 and then go into the project site. With the  
 9 revised proposal that is no longer going to be  
 10 the case. So, you're cutting out a mile and a  
 11 number of trip movements. So, it's even more  
 12 direct, even more easy to get into the project  
 13 site using Route 16 than it would have been  
 14 previously.  
 15 Both MAPD and the city's consulting  
 16 engineer determined that the applicant's trip  
 17 numbers are understated. But let's even look  
 18 at those trip numbers, if you look at Exhibit O  
 19 to my petition, VHB on December 30 of last year  
 20 determined that there would be 226 and 312  
 21 respectively west and eastbound trips along  
 22 Route 16 through Everett during the Friday peak  
 23 hour.  
 24 One thing I do want to point out,  
 Pge. 9  
 1 Commissioners, is that the Revere Beach Parkway  
 2 and Mr. Fitzgerald can speak to this in greater  
 17 One thing I do want to point out as  
 18 well is the applicant notes that Sweetser  
 19 Circle, Route 16 passes underneath it. Still  
 20 when you have backups on 16, it affects  
 21 Sweetser Circle. But one other point that I

22 should make is Santilli Circle, another very  
 23 difficult high crash, high traffic rotary is  
 24 directly on 16 and will be dramatically  
 Pge. 10  
 1 impacted as well.  
 2 I also want to make another point,  
 3 which is the applicant argues that well, Mass.  
 4 DOT didn't require us to look at any areas  
 5 along Route 16 in Everett or any intersections  
 6 in Everett. Route 16 is nominally a DCR  
 7 maintained road, Department of Conservation and  
 8 Recreation. It is not a Mass. DOT road.  
 9 And as I believe was pointed out by  
 10 Green International during the Bridgewater  
 11 hearing when Route 104 was being discussed,  
 12 Mass. DOT really only cares about Mass. DOT  
 13 roads. And Mr. Fitzgerald can speak to that as  
 14 well as can Mr. Errickson. The city has been  
 15 repeatedly told by Mass. DOT that Mass. DOT  
 16 does not care about Route 16.

20 to in Mr. Errickson's affidavit. He can speak  
 21 to it further. But it has not been rebutted in  
 22 any way by the applicant.  
 3 I know that the notice the  
 4 Commission issued regarding these hearings  
 5 indicated that you don't want to hear about the  
 6 back-and-forth between the applicants and the  
 7 surrounding communities. And I won't belabor  
 8 the point. I think I've described it in my  
 9 petition.  
 10 But do want to make the point that  
 11 we are here because we've had literally no  
 12 ability to talk to the applicant. Unlike, for  
 13 instance, the city of Fitchburg which had  
 14 tremendous ability to interact with Cordish,  
 15 unlike the town of Longmeadow which had a long  
 16 interaction with MGM, Mohegan and Suffolk  
 Downs  
 17 literally have refused to speak to the city of  
 18 Everett.  
 19 Why, because Everett is a  
 20 competing host community. They all say, well  
 21 we were worried they were going to be spending  
 22 our money on researching ways to torpedo the  
 23 project. I would submit to the Commission,  
 24 I've been before you a number of times, I hope  
 Page 12  
 1 you have become familiar enough with me to know  
 2 that I don't play dirty tricks.  
 3 The letter I sent to the Commission

4 on December 6 made two points. One, if the  
 5 applicant was allowed to switch their project  
 6 midstream, it would be detrimental to Everett  
 7 as a surrounding community. Why, because they  
 8 refuse to talk to us.  
 9 And two, that as a matter of  
 10 election law I didn't think that the vote in  
 11 Revere was sufficient to authorize that project  
 12 to go forward.  
 13 I think that's a view that least  
 14 some Commissioners shared and a view ultimately  
 15 that prevailed. So, I don't think that the  
 16 city of Everett has done anything untoward.  
 17 It's exercised its First Amendment rights to  
 18 petition government by putting its views before  
 19 you and asking for a level playing field that  
 20 it followed all of the rules, and the applicant  
 21 should as well.  
 22 I don't think any of that justifies  
 23 the applicant completely ignoring and snubbing  
 24 all attempts at good-faith discussion about  
 Page 13  
 1 surrounding community issues.  
 2 If we could go to the next slide, I  
 3 thought it would just be useful to point out or  
 4 -- to compare Everett's situation to the two  
 5 communities that the Commission has found to be  
 6 surrounding communities. You looked at the  
 7 distance from the site to the boundary of the  
 8 various surrounding communities, Bridgewater  
 9 two miles, Bolton five miles, Everett 1.7  
 10 miles.  
 11 Distance to the city center 4.2  
 12 miles for Bridgewater, Bolton 8.1 miles,  
 13 Everett 2.6 miles. If we could go to the next  
 14 slide, peak hour trips. This is the Friday  
 15 p.m. peak hour, Bridgewater 55 to 90 as  
 16 determined by Green. Bolton 100 to 150  
 17 determined by Green.  
 18 Again, these are not the applicant's  
 19 numbers in those circumstances, which I think  
 20 we can all agree the applicant has an interest  
 21 in understating its numbers. Again, from a  
 22 commonsense standpoint, I think some of the  
 23 Commissioners made that point yesterday  
 24 specifically with respect to Route 16. Everett  
 Page 14  
 1 226 to 312 peak hour trips, more than double  
 2 the Bolton numbers.  
 3 Percentage of casino trips -- And  
 4 bear in mind order of magnitude, the slots

5 proposal in Leominster was probably going to  
6 produce one-third to one-fourth of the number  
7 of total trips of this Category 1 facility. --  
8 five to eight percent in Bridgewater, Bolton 11  
9 percent, as I noted from the earlier slide,  
10 seven percent inbound, 18 percent outbound for  
11 the Revere proposal going through Everett.  
12 Again, this is both Bridgewater and  
13 Bolton are the Green International numbers,  
14 whereas the Everett numbers are the applicant's  
15 numbers and which both MAPD and WorldTech  
had

16 said are understated.  
17 With that, members of the  
18 Commission, I'll briefly turn it over just to  
19 see if Mr. Fitzgerald has any points that I  
20 missed with respect to traffic. Of course, if  
21 you have any questions, and then I'll move onto  
22 the involuntary disbursement issue.

23 MR. FITZGERALD: I'll just touch on  
24 a few of the traffic issues that have been  
Page 15

1 discussed. First of all, has to do with trip  
2 distribution. We believe that the amount of  
3 traffic that's anticipated to travel along  
4 Route 16 is understated.

5 When this was originally brought up  
6 in response to the limited information that we  
7 had, we were told that the reason that for  
8 instance Google maps currently sends traffic  
9 via Route 16 instead Route 1A through the  
10 Callahan Tunnel is because the Callahan is  
11 currently closed.

12 But if you look at the travel routes  
13 going in the reverse direction, mainly along  
14 Route 1A, through the Sumner Tunnel onto 93  
15 northbound departing the site, and compare that  
16 travel distance to the Route 16 route, Route 16  
17 is actually three miles shorter.

18 Without any traffic, the Route 16  
19 route takes one minute longer, however. But  
20 with traffic, as was mentioned, especially  
21 along the lower deck entering the city,  
22 certainly that the delays experienced on a  
23 Friday evening commute would outweigh the  
24 traffic signal delays along Route 16 and  
Page 16

1 traffic would likely be diverted along the  
2 Route 16 corridor.

3 CHAIRMAN CROSBY: Something I'm not  
4 following here. You're making the point that

5 everybody is going to take Route 16, which by  
6 the way as a driver I never would elect to do,  
7 but now you're saying that even if there is no  
8 traffic it's slower. Why would people choose  
9 Route 16?

20 CHAIRMAN CROSBY: Is there some data  
21 for that? Do you know that for a fact?

22 MR. FITZGERALD: It's just based on  
23 personal experience. I drive through that road  
24 frequently. And actually quite honestly, I've  
Page 17

1 cut through 16 to try to avoid the lower deck  
2 myself. Sometimes those delays can be just a  
3 parking lot.

4 Also, when talking about changes --

5 So, when the Callahan Tunnel is closed, Route  
6 16 is one of the detour routes that's out  
7 there. And we've been told that traffic signal  
8 alterations have been made at the signals along  
9 the Route 16 corridor. We haven't seen any  
10 data or information to show the before and  
11 after these signal alterations have improved  
12 the congestion along the Route 16 corridor or  
13 not.

14 But one thing I do want to point out  
15 is traffic fluctuates over the course of the  
16 year from month-to-month. Traffic volumes tend  
17 to be lighter in the winter months than they  
18 are in the summer months and that's likely why  
19 the Callahan Tunnel may be closed during a few  
20 months in the winter as opposed to during the  
21 summer.

22 So, certainly need to look at the  
23 summer volumes as well to see the full picture  
24 of what the traffic operations are along Route  
Page 18

1 16.

2 Another point that I'd like to bring  
3 up is that in reviewing the January 22 memo  
4 that was provided regarding traffic, this  
5 discussion about trips, traffic volumes  
6 generated from the casino, based on Exhibit C  
7 in that document, it appears that the volumes  
8 that are being presented are that just for the  
9 patrons only and not for employee trips.

10 You certainly want to be looking at  
11 the complete picture. Again, looking at what  
12 the employee trips are going to be and where  
13 satellite lots will be located and how that  
14 also impacts Route 16.

15 Lastly, regarding Saturdays, just to  
16 expand on what was previously mentioned about  
17 Saturday volumes, the westbound traffic volume  
18 around Route 16 appears to be almost pretty  
19 close to what the traffic volume is heading  
20 westbound on 16 during the Friday peak period.  
21 But with the Saturday condition, you've got  
22 increased trips being generated by the casino  
23 on top of the fact that in the westbound  
24 direction in particular at least at this point  
Page 19

1 the trips are estimated at 18 percent.  
2 So, not only do we need to look at  
3 the Friday which is very important but also  
4 along Route 16, the Saturday s have to be  
5 addressed and looked at to make sure that Route  
6 16 corridor and any impacts to traffic  
7 operations are mitigated.

8 COMMISSIONER MCHUGH: What does the  
9 18 percent figure mean?

10 MR. FITZGERALD: What is currently  
11 being estimated in VHB study is that seven  
12 percent of entering site traffic will travel  
13 via Route 16 eastbound.

14 COMMISSIONER MCHUGH: You are using  
15 their 18 percent.

16 MR. FITZGERALD: Yes, and they are  
17 saying 18 percent, a heavier distribution will  
18 be for exiting.

19 COMMISSIONER MCHUGH: Do you have  
20 any idea what percentage of trips the 226 or  
21 the 312 is, what the additional -- is that in  
22 the data?

23 MR. SILVERSTEIN: Commissioner, I  
24 believe according to, and this again is Exhibit  
Page 20

1 O to my petition the December 30, 2013 memo  
2 from VHB, they claim that that will reflect  
3 four and six percent increase in volumes west  
4 and east of Route 99 respectively.

5 COMMISSIONER MCHUGH: And do you  
6 have any data that counters that?

7 MR. SILVERSTEIN: I don't,  
8 Commissioner. This will segue into the  
9 disbursement request.

10 COMMISSIONER MCHUGH: I understand.  
11 So, we don't know if there's any decrease in  
12 the service level from that four to six  
13 percent?

14 MR. SILVERSTEIN: We don't  
15 specifically. I would note that DCR and MAPC

16 again did not agree with those distribution  
17 numbers. And that I believe that the Bolton  
18 and/or Bridgewater changes in percentage  
19 increase in traffic were comparable. But I  
20 don't think we can --

21 COMMISSIONER MCHUGH: I understand  
22 that, but those are very different roads from  
23 Route 16. We were talking about 117, which is  
24 a two-lane road. This is a very different road  
Page 21

1 with different interchanges.

2 MR. SILVERSTEIN: Agreed, but a  
3 percentage of traffic is a percentage of  
4 traffic. So, since Route 16 carries a lot more  
5 traffic and I would submit it's a lot more  
6 problems that it is a proportional increase.

7 COMMISSIONER MCHUGH: I see. I take  
8 your point.

Page 29

24 COMMISSIONER ZUNIGA: I have a  
Page 30

1 question. The city has first-hand access to  
2 the numbers that the Wynn proposal would  
3 generate in terms of traffic studies and the  
4 like. Have you looked at those numbers in  
5 terms of -- I know they're different projects  
6 but there's an argument that there will be  
7 increased traffic in Route 16 about either  
8 project. Have you looked at those numbers and  
9 compared them to make assumptions about the  
10 other project?

11 MR. SILVERSTEIN: We've looked at  
12 them to a certain degree, Commissioner. I  
13 think that Mr. Fitzgerald speak more to this.  
14 But there is a great deal of mitigation taking  
15 place in Everett if the Wynn proposal goes  
16 forward. So, that's less of a concern. But  
17 certainly I think the Wynn numbers are higher  
18 on Route 16. I think it does inform the fact  
19 that certainly you would expect some trips to  
20 coming on Route 16 for that proposal as well.  
21 So yes, I think that is worthwhile

22 to look at that. I don't think -- Again, we  
23 haven't had the funding to have WorldTech do a  
24 real in-depth analysis to compare those  
Page 31

1 proposals and how they would respectively  
2 impact Route 16 or to compare it. Certainly,  
3 we've looked at it from Route 16 itself. I  
4 don't know if you have more specific questions  
5 about that, I'm certain Mr. Fitzgerald could

6 answer it.

7 MR. FITZGERALD: There is obviously,  
8 going to be traffic going from the Wynn Casino  
9 onto Route 16, totally different projects,  
10 totally different distributions. However, yes,  
11 there will be traffic going on Route 16.  
12 A lot of the traffic from the Wynn  
13 project is anticipated coming in from the other  
14 way because of its very close proximity to 93.  
15 But to address the traffic coming in  
16 along Route 16 right now there is a number of  
17 costly mitigation measures, including  
18 especially over at Santilli Circle in  
19 particular, to try to accommodate these already  
20 over burden locations Santilli, Sweetser,  
21 locations such as that to handle that.

22 I believe the current proposal is  
23 for raise interchange at Santilli, for  
24 instance. It's a very complex – Santilli  
Page 32

1 Circle is a very complex location. It's a  
2 combination of a traffic circle with a road  
3 traveling through and traffic signals.

4 COMMISSIONER ZUNIGA: I think I've  
5 gotten lost around there every now and then.  
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7 MR. FITZGERALD: One thing that I  
8 would like to say is obviously if Route 16 is a  
9 very efficient corridor in that the traffic  
10 signals are free-flowing and delays,  
11 significant delays aren't experienced along  
12 this corridor that is three miles shorter, it's  
13 three miles shorter of a travel route, then  
14 wouldn't more vehicles travel along that  
15 roadway?

16 Route 16, especially Santilli Circle  
17 on a Saturday especially during winter periods  
18 or heavy shopping periods is pretty congested  
19 and people try to avoid it as a result.

20 So, I guess my question is which one  
21 is it? Is it a very efficient corridor for  
22 vehicles to go and therefore more trips will  
23 travel down this corridor? Or is it congested  
24 to the point that if you add more trips to it  
Page 58

1 then you're just going to overburden -- you're  
2 going to add traffic to already overburden  
3 intersections. Again, without having the  
4 evaluations or the analysis to review, I can't  
5 really answer that.

6 COMMISSIONER MCHUGH: The logical

7 extension of that is if you don't fix it, it's  
8 better, right?

9 MR. FITZGERALD: If you don't fix  
10 it, it's better?

11 COMMISSIONER MCHUGH: Yes, because  
12 fewer people will use it. If you fix it, more  
13 people will use it and that's not good. If you  
14 don't fix it --

15 MR. FITZGERALD: Well, it's  
16 already --

17 COMMISSIONER MCHUGH: --broke.

18 MR. FITZGERALD: Yes. It is already  
19 broke, but is it the point of how are the  
20 backups along neighboring streets and things  
21 such as that.

20 And I don't know how the applicant  
21 can voluntarily designate Malden and Salem and  
22 Medford and every single community except  
23 Everett and Somerville, the two that they  
24 perceive as negative. And argue that they're

1 going to mitigate traffic problems on roads  
2 where they're going to have one percent of  
3 their traffic distribution, intersections along  
4 1A, a state highway that that requires  
5 mitigation but not Route 16 is illogical.

6 CHAIRMAN CROSBY: Got it. Thank  
7 you.

8 MR. KENNEDY: My only comment on  
9 some of the intersections that are only seeing  
10 in two percent corridors, two percent  
11 projection corridors, they were addressed  
12 because they were part of our MEPA scope that  
13 was agreed to by MEPA, the surrounding  
14 communities -- not the surrounding communities,  
15 the host communities at the time.

16 DCR and Mass. DOT, we looked at them  
17 because we were asked to. We didn't look at  
18 anything in the Route 16 corridor, west of  
19 Webster Street in Chelsea because we weren't  
20 asked to.

21 And the city of Revere has asked us  
22 to go in and make some signal improvements,  
23 whether it's phasing changes or timing changes  
24 and some resurfacing within those

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1 intersections. Again, that's why those  
2 intersections were included in the study scope.

3 MR. BAKER: Again, I just make the  
4 point, and we'll separately send it to you,  
5 because it's not fair to you to have to go

6 through the voluminous filings, but if you look  
7 at the DOT and the DCR comment letters on our  
8 project, the idea that these state agencies  
9 have not given great thought to this and have  
10 really thought through the impacts on the  
11 regional road system that they own and control,  
12 I just don't think there's a basis for it.  
13 And the other thing I do say is at

14 least Mohegan Sun, there is on negative animus  
15 as it relates to anybody and certainly that was  
16 not the reason the Somerville hearing happened  
17 yesterday.  
18 CHAIRMAN CROSBY: Anybody else? All  
19 right, thank you folks. We will be back to you  
20 and thus conclude Mohegan Sun.

## B. APPLICANT RESPONSE

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Mohegan Sun responds that “[T]he City cannot demonstrate that its transportation infrastructure will be significantly and adversely affected by the development of the gaming establishment. ” See Exhibit 2 , VHB's January 22, 2014 Report on the Transportation Impact of the Proposed Mohegan Sun Massachusetts Resort Casino in the City of Revere on the City of Everett, Massachusetts at 5 ("VHB Everett Report").

Likewise, it appears that the City is relying on outdated and inflated traffic figures to support its Petition.

- Transportation experts have proposed, and the Massachusetts Department of Transportation has confirmed, that the number of gaming position is the primary indicator of trip generation to and from a destination resort casino as has been proposed by MSM. See Exhibit 1, Transcript at p. 32, 13-18. As noted, Sterling Suffolk had proposed a gaming establishment at Suffolk Downs with 6,000 gaming positions, and the traffic information in its September 2013 DEIR reflected that number of positions. e Exhibit 2, VHB Everett Report at 1. MSM will file a Notice of Project Change with the MEPA Office of the Executive Office of Energy and Environmental Affairs further explaining this significant reduction in the development. Id. See Exhibit 4, RFA-2 Response 4-24-09; Exhibit 5, RFA-2 Response 5-33-06. Further, resort generated traffic is largely countercyclical, meaning that the peak hours of vehicle trips to the gaming establishment will occur after commuter "rush hour" traffic periods or on weekends. VHB Everett Report at 1.
- MSM's proposed gaming establishment is now within steps from public transportation. Beachmont Station of the MBT A's rapid transit Blue Line, located on the northeast corner of the site, provides immediate access to the resort. Exhibit 6, RFA-2 Response 4-08-01; Exhibit 5, RFA-2 Response 5-33-06. The change in location of the gaming establishment since SSR submitted its DEIR means that the MBTA station is now much closer to the gaming establishment, increasing the number of patrons and other visitors that will travel to the resort on public transportation. Id. This will further reduce the traffic impacts of the project as projected in the SSR DEIR. Id.
- .
- Another factor that will further decrease the transportation impacts on the City is MSM's comprehensive Transportation Demand Management Plan (TDM). See Exhibit 4, RFA-2 Response 4-24-09; Exhibit 5, RFA Response 5-33-06. The keystone of the TDM is MSM's employee ground shuttle program. MSM will provide strictly limited on-site employee parking, and instead initiate a ground shuttle service at multiple, geographically dispersed locations to intercept employees and shuttle them to and from the site. Id. The DEIR on which the City may rely to assert its petition for designation as a surrounding community includes both patron and employee vehicle trips in the



projections for resort. *Id.* As such, these outdated projections overstate the actual traffic impacts of the MSM gaming establishment.

**REPORT ON THE TRANSPORTATION IMPACT OF THE PROPOSED MOHEGAN SUN MASSACHUSETTS RESORT CASINO IN THE CITY OF REVERE ON THE CITY OF EVERETT, MASSACHUSETTS**

*Mohegan Sun Revere*

Everett

Exhibit 2 to Response to Petition

John J. Kennedy, P.E., PTOE, et. al.

Report on the Transportation Impact of the proposed Mohegan Sun Massachusetts Resort Casino in the City of Revere on the City of Everett Massachusetts (VHB, January 22, 2014)

*Report on the Transportation Impact of the Proposed Mohegan Sun Massachusetts Resort Casino in the City of Revere on the City of Everett, Massachusetts*

START OF REPORT:

The City of Everett has requested Surrounding Community status from the Mohegan Sun Massachusetts (MSM) proposed Resort Casino in Revere. The Revere site's primary access will be via the Route 1A corridor (McClellan Highway) with secondary access via the Revere Beach Parkway/Winthrop Avenue corridor (Route 145). Vanasse Hangen Brustlin, Inc. has prepared various traffic studies, including a Draft Environmental Impact Report on behalf of Sterling Suffolk Racecourse when it was the applicant for the Resort Casino on Suffolk Downs land and components of the RFA-2 gaming license application on behalf of Mohegan Sun Massachusetts. We are currently preparing a Notice of Project Change that will be filed with the MEPA office in late January. The Draft EIR and the RFA-2 gaming application have significant background information relative to trip generation and comparison that is not being replicated within this document.

The initial environmental filing, the Environmental Notification Form, together with the Draft EIR were based upon a study area defined by MassDOT and MEPA. This is critical given that the basis of trip generation is the number of gaming positions based on a series of measurements at comparable sites on the east coast. These measurements also helped to define the time of arrivals and departures to/from the Resort. Those total trips vary considerably by day. The highest weekday demand will occur on Friday (approximately 18% of the weekly demand) with the highest daily demands on Saturday (approximately 20% of the weekly demand).

The MSM Resort's peak generation period will occur after the peak hours on weekdays. Further, based upon an extensive mode share analysis approved by MassDOT, it is projected that

Trip distribution has been based on a series of factors, primarily the probability of a patron visiting a particular property (relative to other market participants) which is a function of both the attractiveness of the facility and the friction associated with getting there. The model is similar to gravity models used by other retailers and restaurants, adjusted for both the attraction and friction components based on a regression analysis of the existing markets.

Based on the projected distribution of patrons, the “catchment area” defined by individual towns/cities has been divided into four primary segments based upon the regional highway corridors they are served by. These segments encompass the north, northwest, west/southwest and southwest/south of the MSM Resort Catchment Area, as illustrated in Exhibit A. These primary corridors will not only serve regional demand, but will serve as local trip collectors from the cities and towns through which they pass, based on the anticipated trip generation associated with each of the communities.

While there has been a change in operator, which will be addressed in the Notice of Project Change, we believe that the trip distribution and generation characteristics of the MSM Resort will change not change significantly, albeit that the trip volumes will be reduced.

Applying the factors identified, Exhibit C illustrates the anticipated approximate increase in volumes associated with trips to the site. Again this Exhibit is based on the presence of 6,000 gaming positions on the site, versus the current program that will have only 5,000 gaming positions. It should be noted that the demand shown for the I-90 corridor (approximately 140/130) and the I-93 demand (approximately 65/60) are fluid, increasing and decreasing due to the series of on and off-ramps along these corridors. The Ted Williams Tunnel demand is further increased by additional traffic from the South Boston ramp system, primarily from the Southeast Expressway.

The City of Everett Surrounding Community petition raises a number of issues concerning trip generation, distribution and assignment. Section B, item 2 presents a series of contentions and cites Exhibits I and J to the petition as prepared by WorldTech Engineering, and then a series of other exhibits that include the Suffolk Downs Infrastructure Improvements Plan Presentation, a DEIR Comment letter from MAPC, a letter of support for Surrounding Community status prepared by MAPC, a Callahan Tunnel closure MassDOT Detour Advisory and technical review documents associated with comments developed by other Peer reviewers on projects in Springfield and Palmer.

The following provides a general response to those issues raised relating to: first, the trip generation developed for the site; second, as to the trip distribution projected for the site; and third, the analysis area.

**Trip Generation** Data contained within the DEIR and the RFA-2 documents has undergone significant vetting with MassDOT and peer review consultants for both the City of Revere and

the City of Boston. Section 5.4 of the Draft EIR provides significant data and information on the process used in defining trip rates, both person and vehicles per gaming position for average daily conditions, for the Friday evening peak and the Saturday mid-day peak. Based on 6,000 gaming positions, the average vehicle trip rate per gaming position is 0.31, with 0.16 vehicle trips per position entering and 0.15 vehicle trips per position entering.

**Trip Distribution** In fact, based on comments received during early review meetings, the distribution developed based on early review was modified at MassDOT’s request to shift five (5%) of the approach demand from the Callahan Tunnel to the Ted Williams Tunnel reflecting a stronger bias to from the south and west.

We have noted the trip distribution estimates by WorldTech and the attachment of the MassDOT proposed detour routing associated with the Callahan Tunnel. In Exhibit J, a series of Google Map directions are provided from locations north and west of the area. All define the route of I-93 to Route 16 to Route 145 (Winthrop Avenue) as the route to follow. This is appropriate for the given condition of the Callahan closure. MassDOT, during its preparation for the Tunnel closure, requested various traffic information providers to modify their programs to remove the Callahan Tunnel from the system. One of these providers was Google, and the Tunnel has in fact been removed from its network model through the duration of the closure. We understand that this change was made consistent with the December 27, 2013 Tunnel closure. The maps in Exhibit J carry a date of January 7, 2014. On January 21, 2014 we confirmed that the Tunnel remains off-system by checking routes to Logan Airport on January 21 from Cambridge City Hall (the Turnpike to the Ted Williams Tunnel), from Somerville City Hall (directed via the Tobin Bridge to Route 16), and from Boston City Hall (directed south on I-93 to access the Ted Williams Tunnel). It should be noted that the Callahan Tunnel, prior to closure, has been operating at well below capacity and the increased demand associated with the trip assignment can easily be added to the Tunnel demand in the 2022 design year and beyond.

### **Trip Assignment**

The distribution exiting the site has been much more heavily skewed to the Route 16 westbound corridor given that it is toll-free, unlike the Callahan and Ted Williams Tunnel and the Tobin Bridge, and in that it does not involve an exit from the regional highway system on the approach. We believe that this is an extremely conservative approach to the distribution pattern but feel that the treatment is warranted.

This local demand is expected to increase flow into the Circle by less than two percent and by close to one percent on the exiting movements to Broadway and Main Street. This, along with added demand associated with local trips from Medford and Somerville result in the “discrepancy of peak hour trips” within the Route 16 corridor. It should be noted also that the

Draft EIR for the resort site in Everett, located in close proximity to the Circle, routes a total of less than 4% of the demand associated with local and other community access is proposed to use the Circle to and from the northerly connections to the Circle. Also note that the regional Route 1 connections are shown as bypassing the Route 99 corridor at their intersection in Saugus, instead, carrying approximately 9% of the site's demand to and from the Route 1/Route 16 interchange. The Route 16 through movement which is part of the regional access plan does not enter the circle, and travels below the circle in a six-lane divided corridor and will not impact the Circle's operation.

**Analysis Locations** The analysis program conducted for the MSM Resort program was based on site related discussions with MassDOT, and scoped in the initial MEPA filing for the site. Indeed, MassDOT had specifically requested as analysis of the geographic "reach" of project impacts prior to confirming its definition of the appropriate study area for the previous (larger) resort project at Suffolk Downs. Further, in response to comments made on the Draft EIR,

**JANUARY 29, 2014 – MOHEGAN SUN COMMENTS ON TRANSPORTATION  
INFRASTRUCTURE**

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7 MR. BAKER: Thanks, Kevin. Mr.  
8 Chairman, members of the Commission, let me  
9 just address the six criteria that are in front  
10 of you. Proximity, it is true that the two  
11 communities share a border. It's a three-  
12 quarter of a mile border. There aren't any  
13 major roads that cut through that border  
14 between the two communities. And I would  
15 simply note that the fact of a border in your  
16 decision as related to the two sister cities of  
17 Fitchburg and Leominster are not dispositive.  
18 Transportation, I'm going to leave  
19 the in-depth -- most of Counsel's presentation  
20 is on transportation. I'm going to leave the  
21 transportation discussion to John Kennedy, who  
22 is a very well-respected transportation expert.  
23 I would note a couple of things.  
24 This issue of what the MAPC found, the MAPC's

Pge. 35

1 letters doesn't say they found anything. They  
2 have a belief and they laid out that belief in  
3 their comments to MEPA.  
4 MEPA and DOT reviewed that belief  
5 and concluded that their reviews were correct  
6 and MAPC's position wasn't. It doesn't mean

7 that further work and research couldn't happen,  
8 but I don't want anyone to think that MAPC's  
9 views have not been fully vetted by the  
10 agencies responsible for the transportation  
11 infrastructure in the Commonwealth.

12 There's this issue of Bolton and I  
13 know --

14 CHAIRMAN CROSBY: Who pays for  
15 upgrades for DCR -- for Route 16?

16 MR. BAKER: Physical maintenance  
17 evidently is paid for by Everett. I don't know  
18 enough to qualify that. But the physical  
19 upgrades in the sense of improvements are paid  
20 for by DCR. Or in our case the improvements  
21 they've asked us to make the private person  
22 will make them. When people have projects they  
23 pay for upgrades.

24 But I can tell you just having sat

Pge. 37

1 in meetings with DCR they made significant  
2 improvements on Revere Beach Parkway. It's a  
3 road they deeply care about. And Counsel is  
4 right, it's a road that goes to their beach.

5 And there is no doubt about that.

6 I would also note just as a

7 correction, there was an implication that the  
8 entrance to the project on Winthrop Avenue  
9 didn't exist in the prior project. That's just  
10 not correct. That entrance on Winthrop Avenue  
11 existed in the prior project and exists today.

Pge. 40

8 MR. KENNEDY: Thank you, good  
9 morning. John Kennedy from Vanasse Hangen  
10 Brustlin. I am just going to focus on three  
11 major points that were questioned in the  
12 petition, our trip generation, our trip  
13 distribution and the trip assignments, where we  
14 loaded traffic, how things will actually  
15 function.

16 Our trip generation was again very  
17 much vetted through Mass. DOT as we went  
18 through the process. In fact, the trip  
19 generation numbers that we used, about .3 trips  
20 per gaming position during that critical Friday  
21 peak period that they talked about, a few more  
22 in than out, matches very closely with the trip  
23 generation profile in the Everett site, which  
24 is .29 trips with slightly more out than

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1 slightly in.  
2 So, in terms of the numbers that we  
3 used when we got into the actual loading of the  
4 site, everything is very, very much balanced.  
5 When it comes to trip distribution,  
6 we vetted our process through a series of  
7 gravity models that were provided by the  
8 sponsor, by the operator. We brought those to  
9 Mass. DOT about a year ago as we were starting  
10 to prepare the ENF.  
11 Mass. DOT asked us to modify them a  
12 little bit to shift some of the demand to the

15 And I'll call Northeast of a line half way  
16 between Route 2 and Route 93 and the balance  
17 from the South and the West. Much less from  
18 the South, believe it or not because there's  
19 competition. A little bit more from the West  
20 even with the future competition. So, we have  
21 got a difference that favors the North.  
22 In looking at the trip distribution  
23 pattern for the Everett site, they are very  
24 much skewed to the South and the West. They've  
Pge. 42

9 more traffic on Mystic Valley Parkway and

12 Just a little mention on Bolton,

20 is, I would focus you on the words in your  
21 regulations, is a state road and not a local  
22 road.

10 Revere Beach Parkway than the Everett project  
11 had envisioned and we're managing it.  
12 So, distribution, when it comes to  
13 distribution we also looked and Mass. DOT has  
14 accepted our findings in terms of the way --  
15 and DCR has supported it -- the way we have  
16 assigned trips to get to the site.

Pge. 43

1 or three minutes of delay to break through,  
2 because once you get beyond a certain point,  
3 things flow much better and you've got a direct  
4 shot into the Callahan Tunnel. Coming out of  
5 the Callahan Tunnel, there will be two signals.  
6 One at Boardman Street, currently experiences a  
7 lot of delay. That is going to be resolved.

8 In fact, our base design volumes in  
9 our design for the Boardman Street intersection  
10 are 65 percent greater than today's volumes.  
11 So, we're really loading up that intersection  
12 and we're finding we can get it to function  
13 very well.

14 Then the Jughandle, which again  
15 something that is being improved with the  
16 addition of a third lane. So, we're enhancing,  
17 we're making it easier to get in on Route 1A  
18 through the Callahan Tunnel.

19 The issue with taking traffic out of  
23 matter, a \$3.50 toll to come back through the  
24 Sumner Tunnel. We decided that we were going

Pge. 44

1 to take a very conservative review or view of  
2 this and relocate that traffic along the Route  
3 16 corridor to get to I93, to get to a series  
4 of uses.

5 That demand does add traffic. In  
6 fact when you compare the 18 percent that we've  
7 got running in that corridor, it's greater than  
8 the total amount of traffic that the Wynn  
9 proposal has using Route 16 westbound, because  
10 they're only assigning nine percent to Route 1  
11 southbound, one percent from Revere and a few  
12 other percent from internal sites. So, the way  
13 they've loaded their system, is not to where we  
14 are.

15 The eastbound traffic coming from I-  
16 93, it's also interesting to note that we were

8 When it comes to total trips, the  
9 amount of traffic that's generated, and we do  
10 have information that we would be more than  
11 happy to provide on the employee demands, we're  
12 looking at about between 40 and 50 employees  
13 entering, arriving at the site during the  
14 afternoon peak hour.  
15 Thirty percent of our employees are  
16 expected to be on transit. The other employees  
17 are not going to be permitted to park onsite.  
18 Mohegan Sun is talking with Paul Revere  
19 Transportation about shuttle buses, remote  
20 pickups just to reduce the amount of employees  
21 in the system. Oh by the way, we assumed that  
22 there were 90 employee trips in our analysis  
23 coming to or past site just to load them in to  
24 be absolutely conservative in what we do.  
Pge. 46

1 The need for improvements in the  
2 Route 16 corridor have been identified as  
3 something that is very much desired. There's  
4 talk about Santilli Circle being a congested  
5 location. Well, by documents contained in the  
6 draft EIR prepared for the Everett site, Route  
7 16 east and westbound is level of service A  
8 passing through the circle.  
9 The bad intersection is the east  
10 intersection with the loop coming from on the  
11 shopping center side taking traffic out and  
12 bringing it up towards Route 99 that's level of  
13 service D.  
14 The approach can be very easily  
15 modified and improvements can very easily be  
16 made if that is something that is desirable.  
17 But the operation in the Route 16 corridor at  
18 that point is the best at any point in the  
19 entire corridor.

11 That takes care of the built condition with the  
12 Everett site.  
13 Again, I think as we go through  
14 this, when we start looking at the amount of  
15 traffic that's placed in the corridor and put  
16 in the corridor, it is a regional corridor. It

21 And I'd like to reiterate something  
22 that I said yesterday. We have included -- I  
23 guess an agreement has been reached. A

24 surrounding community agreement was reached  
Pge 48

1 with Medford because of Wellington Circle.  
2 Mohegan Sun is committed as part of that  
3 agreement to look at the operations of  
4 Wellington Circle because that's where the true  
5 impact is in the Route 16 corridor.  
6 And it's primarily on the westbound  
7 side of the corridor where through traffic  
8 destined to I-93 and up Route 28 into Medford  
9 is concentrated in two lanes.  
10 So, when all is said and done, yes  
11 we are adding traffic. The traffic is spread  
12 over six lanes. The traffic is passing through  
13 two intersections which are congested at this  
14 point. They can be mitigated for under \$2500  
15 using information that's already available. In  
16 fact, that mitigation may have already happened  
17 as part of the Callahan Tunnel closing process  
18 because Route 16 is a primary detour corridor.  
19 We fully disagree with the concept  
20 that people will avoid the Callahan Tunnel to  
21 get to the site because the Callahan Tunnel is  
22 currently running, even with the build  
23 condition in the year 2023 at only about 2650  
24 vehicles. In 1995, prior to the opening of the  
Pge. 49

1 Ted Williams Tunnel to general traffic, the  
2 tunnel was carrying in excess of 3500 vehicles  
3 in the afternoon peak hour in that single  
4 direction heading toward the airport.  
5 Plenty of capacity is available.  
6 So, we see no reason why people wouldn't stay  
7 on the highway to continue on rather than get  
8 off at Route 16, but we have assumed that there  
9 would be a movement to Route 16 to start with.  
10 CHAIRMAN CROSBY: What is the peak  
11 hour total flow on Route 16?  
12 MR. KENNEDY: You're challenging me.  
13 CHAIRMAN CROSBY: What's the order  
14 of magnitude of the increase?  
15 MR. KENNEDY: The order of magnitude  
16 of the increase is four percent, three to four  
17 percent.  
18 CHAIRMAN CROSBY: So, 20 times that.

24 COMMISSIONER ZUNIGA: Do we have  
Pge. 50

1 access to a map of Route 16? I think one of  
2 the presentation slides might be helpful. I'd  
3 like to get a view of what you were just

4 referring to, Mr. Kennedy.

5 MR. KENNEDY: Actually, I've got a  
6 board, not quite of that but it's more of a  
7 regional plan that might be helpful.

8 COMMISSIONER ZUNIGA: Well, whatever  
9 you think may be helpful. I would like to  
10 understand the location of Santilli Circle in  
11 reference to Wellington Circle and the  
12 improvements that you were just talking about.  
13 MR. KENNEDY: Santilli Circle is  
14 just over the river the next controlled  
15 intersection from Medford The circles will go  
16 Wellington Circle to Santilli Circle. Then the  
17 next circle is Sweetser Circle. There is no  
18 signal between Santilli Circle and Sweetser  
Pge 52

23 MR. BAKER: The second point I would  
24 make is I really don't believe that it's  
1 necessary for this independent traffic  
2 analysis. There's plenty of opportunity to  
3 comment through the DEIR process. Counsel made  
4 the point that they didn't receive a copy of  
5 the DEIR. They certainly knew enough about it  
6 to send a letter to you saying that it's  
7 invalid. So, I would just make that point.

19 Circle.

20 And in fact, Route 16 passes under  
21 Santilli Circle. Our loading of Santilli  
22 Circle itself is just minor related to what is  
23 coming in from Medford or from Everett and a  
24 little bit from Medford.

Pge. 51

1 COMMISSIONER ZUNIGA: Is Santilli  
2 Circle the access to the commercial center, the  
3 Target and the Bank of New York?

4 MR. KENNEDY: That's correct.

5 COMMISSIONER ZUNIGA: Thank you.

6 CHAIRMAN CROSBY: Are you finished?

7 MR. KENNEDY: Yes, Sir....

### ***Supplemental Information on the Transportation Impact of the Proposed Mohegan Sun Massachusetts Resort Casino in the City of Revere on the City of Everett, Massachusetts***

The following information and attached exhibits are provided to supplement/support transportation related testimony by John J. Kennedy to the MGC on January 29, 2014 in the matter of a petition made by the City of Everett for Surrounding Community status. This information is limited to the transportation component only. The information provided as part of this attachment is from two sources:

1. Draft Environmental Impact Report, Caesars Resort at Suffolk Downs EEA #15006, Sept. 3, 2013
2. Draft Environmental Impact Report, Wynn Everett, EOEEA #15060, Dec. 16, 2013

During the testimony, a series of parallels were drawn between the trip generation, trip distribution and assignment of vehicular traffic to the roadway network through the City of Revere in response to comments made in the Petition and in the testimony provided by representatives of the City of Everett.

### **Trip Generation**

*General comment- "site trip generation too low"*

Through discussions with MassDOT leading up the filing of the Environmental Notification Form, the step before the filing of the Draft Environmental Impact Report, the use of gaming positions as the measure of trip generation associated with the proposed use of the site was approved. This decision was based on a comprehensive review of other similar sites recognized in the DEIR. It was further established that the critical period to be reviewed was the Friday evening street peak hour with the site generated traffic during that hour added to the existing traffic in the corridor with no allowance for "pass-by" trips. Recognizing the use of public transportation and the absence of employee parking on the site (although for analysis purposes employee related activity was included in the site generation estimates during the peak), the Revere site was assumed to generate 1,869 vehicle trips, of which 976 were "entering" and 847 "exiting". Based on 6000 gaming positions proposed in the initial filing, this equates to a trip rate of 0.31 vehicle trips per position, with 0.16 entering and 0.15 exiting (see Page 5-45, Table 5-19 and notes attached).

For comparison purposes, the Wynn Everett site DEIR assumed a similar but slightly lower rate of 0.29 trips per gaming position (total positions identified 3,972), with 0.14 trips entering and 0.15 exiting (see Page 4-106, Table 4-13 attached).

## **Trip Distribution**

*General comment - "more traffic should be assigned to Route 16 corridor"*

The City of Everett petition identified the need to assign more trips to the Route 16 corridor based on travel distance and a more direct route to the Revere site. The Revere DEIR was prepared based on travel patterns and corridors identified in concert with MassDOT review, which resulted in the Catchment Area illustrated in "Exhibit A" of our initial response to the petition. (Exhibit A is not attached to this supplemental material). The Catchment Area percentages were used to assign the resort generated traffic to the regional roadway system, with approximately three-quarters of the demand from the northwest added to the roadway network served by the Callahan Tunnel and one-quarter added to Route 16.

On the departing direction, more than 60 percent of the northwest catchment area demand was assigned to the Route 16 westbound corridor resulting in 18 percent of all exiting trips from the MSM Revere site assigned to this route. This assignment was identified because of the toll associated with the Sumner Tunnel and the delays associated with cash transactions within the toll plaza. With the planned changes to the tolling system - all automated tolling system via transponders or bill by mail for those without transponders - we believe that the 60 percent demand assumption will be reduced, and that the assignment offers a very conservative assessment of added traffic to the Route 16 westbound corridor.

Note that the preparers of the Everett DEIR recognized issues in the Route 16 eastbound corridor as well, choosing to assign only three-quarters of the approaching trips from the northwest to the Route 16 corridor. The Everett DEIR identifies 17 percent of the Everett site's approach demand to use Route 16 eastbound from the 1-93 area. Five (5) percent were assumed to remain in the 1-93 corridor and enter through Sullivan Square after making a series of left turns. (See attached Everett DEIR Figure 4-49).

Also notice in Figure 4-49 the absence of regional loading onto the Route 99 corridor to and from Route 1, a concern raised in the petition statement, as well as the very low percentage of traffic added to Sweetser Circle from the north. In fact, the improvements identified in the Everett DEIR within the Sweetser Circle area are not associated with the Route 16 east and west movements which actually pass under the Circle, but are associated with the exiting movements from Route 16 that must use the Circle to reach Broadway (Route 99).



Also from Figure 4-49, the approach and departure percentages on Route 16 east of Route 99 through the Chelsea City line is estimated at 14 percent both eastbound and westbound. The MSM Revere distribution assumed seven percent of demand on the eastbound (in the MSM Revere case the approaching demand) and 18 percent westbound or departing the MSM Revere site.

## **Trip Assignments**

*General Comment- "did not analyze any intersections in Everett and added traffic demands will cause poorer operation on Route 16 through Everett"*

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The Everett DEIR examined eight locations in the Revere Beach Parkway (Route 16) corridor, including six east of Route 99. Two of the six (Location 21: Revere Beach Parkway (Route 16) at Garvey Street/2<sup>nd</sup> Street and Location 26: Revere Beach Parkway (Route 16) at Everett Avenue) were identified as poorly operating (LOS E) during the 2023 No-Build Everett Friday Evening Peak. In the 2023 Everett Build condition, Friday Evening Peak, these two locations remained as poorly operating, again at Level E. The other four remained at Level D or better.

No mitigation was identified for these locations in the Everett DEIR. In fact, the only Revere Beach Parkway (Route 16) intersection between Route 99 in Everett and the Route 1 interchange in Revere recommended for any type of mitigation was the Revere Beach Parkway (Route 16) at Washington Street intersection in Chelsea, and that was limited to signal timing changes. The added traffic added to the Revere Beach Parkway eastbound movement is less than that added by the Everett project. The westbound demand is slightly higher, but during the Friday evening peak, westbound traffic demand does not impact the Level of Service calculation.

The other two locations analyzed along the Route 16 corridor were Santilli Circle (the intersection of Revere Beach Parkway (Route 16), Santilli Highway, Mystic View Road and the Route 99 Connector), and Sweetser Circle. During the existing Friday Evening Peak, Route 16 operations at Santilli Circle are at LOS A. In the 2023 Everett site Build condition with modified signal timing to accommodate access to the Everett site, the Route 16 east and west movements are at LOS C. With equal or lesser demands placed on Route 16 through Santilli Circle, no impact to operations would be anticipated with the MSM Revere site. At Sweetser Circle, because Route 16 traffic is carried below the circle and is not subject to control, no impact is associated with MSM Revere traffic.

## **Attachments**

Caesars Resort at Suffolk Downs Draft EIR, Table 5-19, Page 5-45

Wynn Everett Draft EIR Table 4-13, Page 4-106

Wynn Everett Draft EIR Figure 4-49 Trip Distribution (Patrons)





**Mohegan Sun Massachusetts**  
**Project Vehicular Trip Distribution**  
**Patrons**



Wynn Everett

Draft Environmental Impact Report

**Table 4-13, Comparison of Selected Gaming Facilities**

location	Gaming Positions	Peak Hour Vehicle Trips per Gaming Position		Public Transit Services	On-site Hotel	
		Friday	Saturday			
Sugarhouse Casino Philadelphia, PA	Slots 1,602	In	0.22	0.25	Subway	No
	<u>Tables</u> <sup>b</sup> 354	Out	0.21	0.30		
	Total 1,956	Total	0.43	0.55		
Casino de Montreal Montreal, QC, Canada	Slots 3,000	In	0.14	0.14	Subway	No
	<u>Tables</u> 714	Out	0.14	0.18		
	Total 3,714	Total	0.28	0.32		
Resort World Casino at Aqueduct New York, NY	Slots 4,525	In	0.13	0.17	Subway <sup>c</sup>	No
	<u>Tables</u> <sup>a</sup> 475	Out	0.17	0.16		
	Total 5,000	Total	0.30	0.33		
		<b>Estimated Peak Hour Vehicle Trips per Gaming Position</b>				
Wynn Resort in Everett Everett, MA	Slots 3,072	In	0.14	0.16	Bus <sup>d</sup> !	Yes!
	<u>Tables</u> <sup>a</sup> 900	Out	0.15	0.17		
	Total 3,972	Total	0.29	0.33		

a Assumes six gaming positions per gaming table including poker tables.

b Electronic gaming tables (i.e., one gaming position per table).

c Includes three subway lines and four bus routes.

d Includes eight bus routes.

e Hotel trips calculated separately.

The Sugarhouse Casino rates were not used in developing the average trip rates stated in Table 4-13 because, while the number of gaming positions and gaming area at Sugarhouse Casino are significantly smaller than others surveyed, the numbers of trips that casino generates is higher per gaming position; these unusual results seem to indicate that there are other unknown factors influencing the trip making characteristics at that location. The other sites surveyed were also more similar in the numbers of gaming positions and amenities offered to those proposed for the Project. The average vehicle trip rates from the Casino de Montreal and Aqueduct were adopted for the Project Site and converted into associated

Table 5-19 Project Trip Generation by Mode

<i>Enter/Exit</i>		<i>Average Daily</i>				<i>Friday Evening Peak Hour</i>				<i>Saturday Afternoon Peak Hour</i>			
<i>Trip Type</i>		<i>Autos/ Taxis</i>	<i>Shuttles/ Coaches</i>	<i>Public Transit</i>	<i>Walk Bike</i>	<i>Autos/ Taxis</i>	<i>Shuttles/ Coaches</i>	<i>Public Transit</i>	<i>Walk Bike</i>	<i>Autos/ Taxis</i>	<i>Shuttles/ Coaches</i>	<i>Public Transit</i>	<i>Walk Bike</i>
Patrons	Enter	11,179	49	2,945	-	917	4	240	-	949	4	249	-
	Exit	11,172	49	2,945	-	847	3	222	-	794	3	208	-
	Total	22,358	98	5,890	-	1,764	7	462	-	1,743	7	457	-
Employees	Enter	915	-	523	122	59	-	34	8	116	-	66	15
	Exit	915	-	523	122	39	-	22	5	50	-	28	7
	Total	1,830	-	1,046	244	98	-	56	13	166	-	94	22
TOTAL	Enter	12,094	49	3,468	122	976	4	274	8	1,065	4	315	15
	Exit	12,094	49	3,468	122	886	3	244	5	844	3	236	7
	Total	24,188	98	6,936	244	1,862	7	518	13	1,909	7	551	22

A portion of the Resort vehicle trips will comprise existing trips, including the following:

- + trips passing the site or diverted from other parts of the local roadway network;
- + trips associated with the existing retail plaza;
- + trips passing through the site between Route 1A and Route 145; and
- + trips associated with the existing racetrack, including employees and visitors, who will also use the new Resort facilities.

To present a conservative (worst case) analysis, no trip "credits" have been applied to these diverted existing trips, and the total Project trips presented in Table 5-19 are incorporated into the 2022 Build analysis. As shown, the Project would generate approximately 1,869 vehicle (auto, taxi, shuttle and coach combined) trips (total entering and exiting) in the critical Friday afternoon peak analysis hour including patrons and employees. Total Project vehicle trip generation during the Saturday afternoon peak hour would be slightly higher, at approximately 1,916 vehicle trips.

#### 5.4.7 Vehicular Trip Distribution & Assignment

The geographic directional distribution of Project trips is a function of several variables including the relative locations and densities of population, competing land uses, existing travel patterns, and the efficiency of roadways leading to the Project site. The

## C. RPA ANALYSIS

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January 7, 2014

RE: City of Everett's request for Surrounding Community Status

On behalf of the Metropolitan Area Planning Council, I write today to express support for the City of Everett's request to be designated as a Surrounding Community with respect to the proposed Category 1 gaming facility in the City of Revere.

MAPC conducted a thorough review of the MEPA filings for the proposed Suffolk Downs casino in Revere and East Boston. In our comments on the Environmental Impact Report, MAPC concluded that "the Proponent has underestimated the number of trips on Route 16 and should reevaluate the trip assignment and distribution assumptions.

As envisioned by the Expanded Gaming Act and the Commission's regulations, Surrounding Community designation is the process by which communities like Everett have the opportunity to ensure that any impacts from a proposed gaming facility are recognized and properly mitigated. MAPC recommends that the Commission allow the City of Everett to avail itself of this important process.

Thank you for the opportunity to express our support the City of Everett's request.

## Metropolitan Area Planning Council (MAPC) Comments on Casino Resort at Suffolk Downs DEIR/EPNF, MEPA #15006

### Regional Trip Distribution and Traffic Analysis

Casinos are significant and unique traffic generators. Unlike most other uses, casinos generate traffic 24 hours a day, 7 days a week, 365 days a year. More than half of weekly gaming activity for this Project is expected to occur on Friday, Saturday and Sunday combined. MAPC respectfully requests the Secretary to require the Proponent to include the following components in the FEIR that address the distinctive aspects of this Project:

#### Harbor Tunnels Traffic Volumes

The Proponent has acknowledged that available traffic volume data for the Ted Williams and the Sumner/Callahan Tunnels are either incomplete or outdated (from 2005). The Proponent has estimated that 44% of vehicular trips will utilize the Ted Williams Tunnel (I-90) and 25% of vehicular trips will utilize the Sumner/Callahan Tunnels (Route 1A) to access the Project.

Massachusetts Department of Transportation's (MassDOT) comment letter addressing the Environmental Notification Form (ENF) noted, "There may be three different traffic demand peak hours within the study area: the peak hour of the general traffic/tunnel facilities; the peak hour of Logan International Airport; and the peak hour of the resort casino. These three peak hours are likely to fall close together on Friday night, and the Project-related traffic could result in an extended peak (Friday 5-8 PM) period of very high congestion levels in the tunnels."

As also mentioned by MassDOT in this letter, it is critical that current and complete traffic volume data be obtained for the tunnels in order to effectively evaluate their potential traffic impacts. The Proponent should be responsible for conducting traffic counts to collect current and accurate data for the tunnels. With this new data, the Proponent should update their traffic analysis and perform a capacity analysis which will allow for a complete and accurate evaluation of the tunnels. With an estimated 70% of traffic forecast to utilize the tunnels to access the Project site, they are essential connections.

#### Route 16

MAPC believes that the Proponent has underestimated the number of trips on Route 16 and should re-evaluate the trip assignment and distribution assumptions. The Proponent should continue to work with MassDOT and the Department of Conservation and Recreation (DCR) to determine the potential traffic impacts along Route 16, and include an analysis of the following intersections:

- Route 16 and Route 38 (Mystic Avenue) in Medford
- Route 16 north-south to east-west maneuvers east of Route 38 (Mystic Avenue) in Medford
- Route 16 and Route 28 (Fellsway) in Medford
- Route 16 and Route 99 (Broadway) in Everett

#### Patron Trip Analysis

The Proponent should provide more detailed information in the FEIR on trip assignment, trip distribution (by town or zip code) and mode split for each community that is part of the patron catchment area established by their Caesars' gravity model

### Mode Share Goals

The FEIR should outline a program to ensure that specifically defined mode share goals (vehicular, bicycle, pedestrian, and public transit) for both patrons and employees are accomplished. Along with specific steps to achieve these goals, the Proponent should provide annual updates, publicly sharing the results. There should be a comprehensive reassessment after the Project has been fully open for two years. Mode share goals should result in an increase of employee carpooling, public transportation, shuttles, charter buses, walking, and bicycling, and a decrease for single-occupancy vehicle (SOY) use.

We ask the Secretary to require that the Proponent respond to this request by designating mode share goals with specific numerical objectives which will, in turn, be reviewed and codified in the Boston Redevelopment Authority's (BRA) Cooperation Agreement. The Transportation Access Plan Agreement (TAPA) that will be executed between the Boston Transportation Department (BTD) and the Proponent should address the details of how the mode share goals will be implemented.

### Transportation Mitigation and Monitoring



### Mitigation Timeline

A timeline should be developed that will address the Proponent's contributions to programming for infrastructure and roadway improvements as part of their mitigation responsibilities. Plans for the long-range maintenance and upkeep of infrastructure improvements (e.g., new and existing roadways, transit improvements, and bicycle/pedestrian infrastructure) should also be included. It is recommended that transportation infrastructure improvements take place as early as possible so these improvements will both benefit the community and improve traffic flow during construction.

### Measurable Milestones

The Proponent should commit to develop a monitoring program for all modes (vehicular, bicycle, pedestrian, and public transit). The monitoring program should have measurable milestones and serve as a benchmark for progress in meeting the mode share goals and other transportation objectives, including changes in parking, local and regional traffic, and public transportation. It should outline contingency measures that will be undertaken if these benchmarks are not met. The Proponent should provide annual updates, publicly sharing the results. The intent of the transportation monitoring program is to confirm that actual changes are consistent with forecasted changes. With a monitoring program, the actual impacts of a project can be determined and additional mitigation measures identified. Shortfalls in meeting mode share or other targets can be identified and remedied. The need and schedule for the implementation of additional mitigation measures will depend on the results of the transportation monitoring program.

We ask the Secretary to require that the Proponent respond to this request by preparing a transportation monitoring program which will, in turn, be reviewed and codified in the BRA's Cooperation Agreement. The TAPA that will be executed between BTM and the Proponent should address the details of how the transportation monitoring program will be implemented.

### Employee and Patron Parking

The transportation monitoring program should also provide a detailed description of the plans to monitor and enforce employee compliance with the proposed parking program. Specifically, how will parked cars associated with the Project be kept from parking on local streets in the area neighborhoods? For example will employees be required to place stickers on their windshields to identify they are affiliated with the casino?

### Specific Improvements and Intersections

The Proponent should also monitor the specific improvement goals for the following intersections:

- Improvements on Route 16 are expected to divert trips from the two-mile stretch of Route 60 between Route 1 and Routes 16/145 (south of Bell Circle) to the 1.25-mile stretch of Route 16 from Route 1 to Route 145, resulting in a significant reduction of VMT (vehicle miles travelled) annually.
- A flyover at the entrance of Route 1A and Boardman Street has been proposed. This proposed infrastructure change will affect the intersection of Waldemar Avenue and the South Site Driveway with Route 1A.

### Poorly Performing Intersections

The Proponent should agree to closely monitor the following intersections which they have identified to be the worst performing intersections with the most Project-related traffic:

- Route 1A, Route 60, Route 16, Beach Street, and Everett Street (Bell Circle);
- Intersection of Route 1A and Boardman Street;
- Intersection of Route 1A and Boardman Street;
- Intersection of Revere Street and Route 60;
- Intersection of Route 145 (Winthrop Avenue), Route 16, and Harris Street; and
- Intersection of Route 145 (Winthrop Avenue), North Shore Road, and Tomasello Drive.

### **Coordination of Project Components and Transportation Improvements**

Project construction is expected to take approximately 26 months. The Project will be constructed in one continuous phase, although certain portions of the Project will open to the public before others are completed. The Proponent needs to ensure that significant off-site transportation improvements are completed according to a schedule that precedes the opening of Project components that are expected to generate impacts which will be mitigated by those improvements. At a minimum, "significant off-site transportation improvements" should include the reconstruction of Tomasello Drive, the Route 1A Flyover (widening of and improvements to Route 1A), and improvements along Route 16.

### **MBTA Bus Stop**

An MBTA bus stop may be located along Tomasello Drive to cater to visitors and employees for direct access to the Project. Since there will be no on-site employee parking, an actively used MBTA bus stop is essential. The FEIR should include a summary of the specific MBTA routes that will utilize this site, as well as the estimated number of trips and ridership. The Proponent should continue to work with the MBTA to maximize the utilization of this bus stop. In order to deal with increased demand generated by the Project, the Proponent should also commit funds to support the operating costs of the MBTA bus routes which will utilize this bus stop as well as the Blue Line service, since some of these services may need to be expanded.

**Metropolitan Area Planning Council (MAPC) Letter, 3/7/2014**  
**RE: Mohegan Sun Massachusetts, Notice of Project Change, MEPA #15006**

The Metropolitan Area Planning Council (MAPC) regularly reviews proposals deemed to have regional impacts. The Council reviews proposed projects for consistency with MetroFuture, the regional policy plan for the Boston metropolitan area, the Commonwealth's Sustainable Development Principles, the GreenDOT initiative, as well as impacts on the environment.

The Proponent has submitted a Notice of Project Change (NPC) for the Mohegan Sun Massachusetts Casino. While the previously reviewed project was proposed in both Boston and Revere, the revised project is now sited solely in Revere. Total site acreage has been reduced from 161 to 40 acres and the amount of programmable space has been slightly reduced from approximately 982,741 to 965,066 square feet. The most significant change to the building program is a 49-percent reduction in gaming space to approximately 171,812 square feet. The total number of proposed parking spaces is 4,470, a reduction of 630 spaces from the previously proposed project. Of these spaces, 4,200 will be in a structured parking facility underneath the casino and 270 spaces will be provided on-site as surface parking.

The southern boundary of the project is now Furlong Drive to the south. The Proponent proposes infrastructure improvements to Furlong Drive that include widening and signalization. Due to the change in building location, the MBTA's Beachmont Station is in close proximity to the project's northeastern boundary. Accordingly, the Proponent proposes access improvements to Beachmont Station, rather than Suffolk Downs Station. Improvements also include upgraded pedestrian and bicycle connections from Beachmont Station to the project site.

The Proponent believes that while geographic traffic patterns will be very similar, the reduction in the number of planned gaming positions will result in lower trip generation and reduced traffic-related impacts. The revised project will include approximately 5,000 gaming positions, approximately 17 percent fewer positions than the previous project. The Proponent has determined that the number of daily vehicle trips will be 37,757, a reduction of 2,429 trips from the previously proposed project. It is important to note that primary vehicular access will still occur on Route 1A, which is forecast to carry more than 70 percent of traffic to and from the site.

Even if some of these impacts might be reduced, they still require mitigation as outlined in the existing scope (and as previously requested in MAPC's earlier comment letters), and while the precise nature and extent of mitigation might change, the list of required actions should remain in place.

## D. DEIR ANALYSIS

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### DCR ENF COMMENT LETTER

March 26, 2013

Re: EOEEA #15006 Caesars Resort at Suffolk Downs EN

The Department of Conservation and Recreation ("DCR" or "Department") is pleased to submit the following comments in response to the Environmental Notification Form ("ENF") submitted by Sterling Suffolk Racecourse LLC ("the Proponent") for the Caesars Resort at Suffolk Downs project (the "Project").

As described in the ENF, the Project proposes to redevelop approximately 161 acres of land to construct a destination resort in East Boston and Revere. The proposal includes two distinct gaming areas, up to 450 guestrooms in two hotels, a multi-purpose meeting/entertainment space, and restaurant and retail space. The ENF presents conceptual roadway improvements, including new ramp connections at the Route 1 / Route 16 interchange intended to reduce traffic volumes on nearby Route 60. A total of 5,150 parking spaces are proposed for the Project site, including approximately 2,600 spaces within a seven-story parking garage. Primary site access is proposed off Route 1A, with a secondary access road off Revere Beach Parkway at Tomesello Way. Bicycle accommodations are proposed along Bennington Street between Saratoga Street and Eliot Circle. The Project requires a full Environmental Impact Report ("EIR").

DCR has care and control of Revere Beach Parkway, including Eliot Circle located approximately 1/4 mile north from the proposed development. In addition, DCR has care and control of Belle Isle Marsh Reservation in East Boston, located across Bennington Street from the Project site. OCR's Revere Beach Reservation is located approximately 1/2 mile to the north of the proposed Project. The ENF states the Project requires a DCR Construction and Access Permit.

DCR submits the following comments related to current vehicle capacity and impacts to Revere Beach Parkway.

#### **Transportation**

As part of the EIR, DCR requests that the Proponent prepare vehicle trips estimates to approximate the anticipated distribution of trips between the two proposed site entrances / exits (Route 1A and Revere Beach Parkway). DCR also requests specific information on the requested improvements to traffic signals or other infrastructure on Revere Beach Parkway at Tomesello Way. Additionally, DCR requests details on the proposed alteration to the traffic signal at Garfield Avenue/Webster Avenue/Revere Beach Parkway in Chelsea.

DCR has received requests from the City of Revere to reduce the number of lanes on Revere Beach Parkway between Harris Road and North Shore Road from six lanes (three eastbound I three westbound) to four lanes (two eastbound I two westbound). As part of the EIR, DCR requests that the Proponent evaluate what impacts this change might have, given the anticipated level of traffic during peak periods.

DCR notes that the existing horse racing activity at Suffolk Downs generates large amounts of traffic on certain Saturdays in May and June, coinciding with Triple Crown horse racing events. DCR's Revere Beach Reservation also generates a significant amount of traffic on these specific Saturdays when temperatures are relatively high. To understand the maximum potential traffic load on Revere Beach Parkway, DCR requests

that the Proponent generate expected peak traffic estimates on Revere Beach Parkway between Eliot Circle and Route 16.

DCR notes that two bridges along Revere Beach Parkway are scheduled for reconstruction I repair under the Accelerated Bridge Project: one located over the MBTA Blue Line between the Beachmont and Revere Beach stations; the other located over the MBTA Newburyport I Rockport commuter rail line at Winthrop Avenue. DCR requests that in the EIR the Proponent specify whether work on these bridges and any resultant reduced capacity may impact Project construction.

DCR requests that the EIR include information on how tour buses will access the proposed site, and the anticipated volume of tour buses that can be expected.

#### Revere Beach Reservation

DCR notes that the southern extent of Revere Beach Reservation is a half-mile from the Project site, and is two stops away on the MBTA Blue Line. In the EIR, DCR requests that the Proponent include an analysis to anticipated impacts to area open space and recreation facilities, including DCR's Revere Beach Reservation and Belle Isle Reservation.

Thank you for this opportunity to comment. If you have questions or need further information on DCR parkways, please contact Ken Kirwin at 617-626-1498 or ken.kirwin@state.ma.us.

DCR did not provide any specific Everett related comments in the analysis of Mohegan Sun's ENF. It did include a more general statement regarding Route 16 Revere Beach Parking, which traverses through Everett. DCR stated (

March 14, 2014

RE: EOEEA #15006 Mohegan Sun Massachusetts NPC

The Department of Conservation and Recreation ("DCR" or "Department") is pleased to submit the following comments in response to the Notice of Project Change ("NPC") submitted by Mohegan Sun Massachusetts ("the Proponent") for the Mohegan Sun Massachusetts project (the "Project").

The NPC proposes changes to a casino/resort project that underwent the ENF and Draft EIR stages in 2013. The changes noted in the NPC were made in order to move the entire Project within the city of Revere. The Project Site is reduced to approximately 40 acres, from 161 acres in the ENF and Draft EIR. The proposal in the NPC includes 5,000 planned gaming positions, up to 550 guestrooms in two hotels, a multi-purpose meeting/entertainment space, and restaurant and retail space. The proposal includes 4,200 parking spaces in a parking garage beneath the Project site, as well as an additional 270 surface parking spaces. The NPC states that primary vehicular access will be provided on a new roadway off Route 1A by revising the access point from Route I A at Furlong Drive. Similar to previous iterations, a secondary access road will be provided on Tomesello Way off Revere Beach Parkway. Although components of the proposed Project differ in size from the previous filing, the total square footage of the development is

similar (982,741 sf vs. 965,066 sf). In the NPC, the Proponent makes commitments to fund various improvements to the transportation infrastructure in the vicinity of the Site.

DCR has care and control of parkways near the proposed Project, including Revere Beach Parkway, Winthrop Parkway, Revere Beach Boulevard, and Ocean Avenue. DCR's Revere Beach Reservation is located approximately ½ mile to the north of the proposed Project. The NPC states the Project requires a DCR Construction and Access Permit.

DCR submits the following comments related to the scope for the forthcoming Final Environmental Impact Report ("FEIR").

### **Transportation**

DCR notes that moving the entire Project site within the city of Revere will change vehicular access to the site, compared to previous site plans proposed in the ENF and DEIR.

In the Final EIR, DCR requests design details for proposed mitigation at Revere Beach Parkway at Winthrop Avenue and Harris Street in Revere; Revere Beach Parkway at North Shore Road, and Tomesello Way in Revere; and Revere Beach Parkway at Garfield Avenue and Webster Avenue in Chelsea. The Final EIR should also identify what permitting requirements are associated with each mitigation proposal, including DCR permitting.

To anticipate possible impacts to nearby DCR parkways resulting from tour buses, DCR requests that the Proponent identify tour bus volumes and routes. DCR notes that Winthrop Avenue, Revere Beach Boulevard, and sections of Revere Beach Parkway are restricted to pleasure vehicles only. As such, tour bus travel on these parkways would require a permit from DCR. In addition, there are weight restrictions on certain parkway bridges (subject to MassDOT jurisdiction) that the Proponent should be aware of when preparing its tour bus routing plan. DCR is available for consultation on this request

DCR further notes it has received requests from the city of Revere to reduce the number of lanes on Revere Beach Parkway between Harris Road and North Shore Road from six lanes (three eastbound / three westbound) to four lanes (two eastbound / two westbound). DCR reiterates its request that, as part of the FEIR, the Proponent evaluate what impacts this change might have, given the anticipated level of traffic during peak periods.

### **Revere Beach Reservation**

The NPC states that the Proponent is exploring partnership options with DCR for assisting with activities at Revere Beach Reservation. DCR requests that the Proponent provide specific details on this topic in the FEIR.

## **MASSDOT COMMENT LETTER**

## MassDOT Comments on Mohegan Sun NPC, 3/17/14

The Public/Private Development Unit has reviewed the Notice of Project Change (NPC) for the Mohegan Sun Massachusetts (MSM) project in Revere. The original project (Caesars at Suffolk Downs) entailed the redevelopment of the existing Suffolk Downs thoroughbred racetrack facility located along Route 1 A in East Boston and Revere into a casino resort facility. The project was proposed to include:

- An approximately 300-room hotel and an approximately 150-room hotel;
- Multipurpose meeting/entertainment space;
- Approximately 16 restaurants including fine dining, casual restaurants, and a marketplace/food court;
- Approximately 200,000 square feet of gaming space containing 4,000-5,000 slot machines, 200 table games, and a World Series of Poker room;
- Approximately 30,000 square feet of retail;
- A Central Utility Plant; and
- A seven-story, approximately 2,550-space parking garage; one level of underground valet parking for approximately 460 cars; and approximately 2,040 surface parking spaces (total of 5,050 spaces).

In accordance with the Gaming Act, this proposal was subject to a referendum, which was voted down in East Boston, but approved in Revere. Prior to the vote, Sterling Suffolk Racecourse, the owner of the property, severed ties with the project's proponent Caesar Entertainment. Since then, Mohegan Sun was brought on board as the new proponent for the project, and the gaming facility was relocated entirely in Revere with an alternative development program. The MSM proposal entails:

- Approximately 171,820 sf gaming space containing 5,000 gaming positions;
- Two hotels totaling between 450 and 550 keys;
- Multipurpose meeting/entertainment space;
- Approximately 92,000 sf of restaurants including fine dining, casual restaurants, and a food court;
- Approximately 102,000 sf feet of retail and retail circulation space;
- A 12,100 sf Spa/Fitness facility;
- Approximately 167,600 sf of support, loading, back of house and utilities space;
- A 5,000 sf greenhouse; and
- Approximately 4,470 parking spaces.

The project site is located in the City of Revere and comprises approximately 45 acres of the 116-acre Suffolk Downs site. It is bounded to the west by a retail shopping plaza; to the north by Winthrop Avenue; to the east by Washburn Avenue; and to the south by the Suffolk Downs Racetrack facility. According to the NPC, the existing horse racing operation at Suffolk Downs is expected to continue; however, racing and gaming operations will be separate and distinct, and ownership will be separate.

Based on information included in the NPC, the project at full build is expected to generate approximately 37,787 vehicle trips on an average weekday, of which 21,857 represent new vehicle trips and 15,900 represent existing vehicle trips. The project is categorically included for the preparation of an Environmental Impact Report (EIR). The project requires a Vehicular Access Permit because of revised site access and roadway improvements proposed along Route 1A to mitigate the project's traffic impacts. The preliminary trip generation calculations for the revised development plan indicate that the project at full build would have significant impacts on the nearby transportation system.

These impacts would generally be of a similar magnitude as the previously reviewed Caesars at Suffolk Downs project. Therefore, a number of assumptions, analyses, and methodologies presented in the DEIR would remain true for the Mohegan Sun Massachusetts project. Nevertheless, the FEIR should include an updated transportation study prepared in conformance with EOEEA/MassDOT Guidelines for Transportation Impact Assessments. The study should include a comprehensive reassessment of the transportation impacts of the project based on the development program for the MSM casino resort. The TIA should provide updated capacity analyses of existing conditions, future No-Build conditions, and future Build conditions within the study area. The revised study should propose an integrated multimodal mitigation package intended to maximize the possible use of non-SOV travel modes by both employees and customers. In addition to the comments and/or concerns raised on the DEIR, the FEIR should address the following comments.

#### Trip Generation

The TIA should update the trip generation calculations to reflect MassDOT's requirements that the rates be derived from multiple data sources of comparable casino facilities of similar size and amenities. The trip generation estimates for the Caesars at Suffolk Downs proposal were based on research data from a number of other comparable projects and on information from proprietary data for Caesar Entertainment gaming facilities. At a minimum, the FEIR should evaluate proprietary data at the Mohegan Sun facility in Connecticut to determine how they apply to the proposed project and whether the existing rates per gaming position could be used as one of the comparables to determine an average rate for the MSM project. The FEIR should include a comprehensive analysis of the traffic counting program at the Mohegan Sun Connecticut facility, provide the background documentation, and justify the selection of the existing rate as one of the comparables to estimate the MSM project trip generation.

#### Trip Distribution and Assignment

The FEIR should include an updated trip distribution and assignment for both patrons and employees for the project. The trip distribution should be based on a gravity model or on trip distribution patterns from Mohegan Sun proprietary data. The FEIR should discuss how they would apply to the proposed MSM site in Revere. The FEIR should identify any factor that would cause the trip distribution and assignment for this project to significantly change from the previous proposal's trip distribution. The FEIR should provide sufficient documentation that verifies how the different percentages are calculated and assigned to the roadway network and the transit system.

#### Traffic Operations

The FEIR should reevaluate traffic operations for the project based on the revised trip generation. In particular, the FEIR should address how the relocated entrance of the site to Furlong Drive and the proximity of the site to Winthrop Street would impact traffic operations at these intersections and other intersections further upstream and downstream along these corridors. The proponent should consult with MassDOT as to the proper methodology to use to ensure that the capacity analysis is an adequate representation of field conditions and that adequate calibration is conducted to simulate Future Build conditions.

#### Pedestrian Access

The DEIR included a thorough inventory of all existing, planned, and proposed services, facilities, and routes for accessing the site. The FEIR should clearly demonstrate how the proposed MSM project site would connect to existing, improved, or proposed pedestrian accommodations within the study area. In particular, the FEIR should include a comprehensive access plan that connects to Route 1A and

Winthrop Street and provides accommodations for all modes. This in turn should connect to the residential neighborhoods along Winthrop Street and Bennington Street.

The site design should also provide for connectivity with the MBTA Beachmont Station with a multimodal pathway specially designed to accommodate the volume of patrons and employees expecting to use public transit to access the site. Additionally, pedestrian accommodations should be provided for connections to the retail uses abutting the site along Route 1A, and the residential neighborhoods abutting Route 145 and Bennington Street. These issues are further detailed below in discussions regarding access to the MBTA Beachmont station.

#### Bicycle Access

Similar to the pedestrian accommodations, the FEIR should include bicycle accommodations that are generally attractive to bicyclists. These accommodations should connect to the existing bicycle network and extend to the other modes and the nearby land uses. In particular, seamless bicycle connections should be provided between the site and the MBTA Beachmont Station. In addition, the FEIR should identify a comprehensive incentive program to encourage bicycle use, including: bicycle sharing on site, showers and other facilities for bicyclists, and a sufficient number of bicycle racks. The FEIR should include conceptual plans of adequate scale that identify all these accommodations and connections to the transportation network.

#### Alternatives Analysis

With the MSM proposal located in Revere, primary access to the site is proposed at the Route 1A intersection with Furlong Drive. The proponent is proposing to redesign and realign Furlong Drive to serve as the primary access to the site, while continuing to provide access to existing businesses. The DEIR included a comprehensive evaluation of alternatives for access to the site. Following discussions with the proponent on the different alternatives include in the DEIR and recommendations by the Secretary of EOEEA, MassDOT has generally agreed to limit to two the number of alternatives to be further analyzed in the FEIR. Even though these alternatives were prepared for the Caesar at Suffolk Downs proposal, they would generally apply and accommodate access to MSM project with no major access modifications and re-routing of project site trips through the roadway network. The major difference of the Route 1A access plan for the MSM proposal is the introduction of a traffic signal at its intersection with Furlong Drive. The FEIR should update the two alternatives to reflect this change and clearly describe its impacts to the rest of the improvements along the Route 1A corridor. MassDOT will continue to work with the proponent during the preparation of the FEIR to seek consensus on a preferred alternative.

The FEIR should include sufficiently detailed revised conceptual plans (preferably 80-scale) for any proposed roadway improvements in order to verify the feasibility of constructing such improvements. The conceptual plans should clearly show proposed lane widths and offsets, layout lines and jurisdictions, and the land uses (including access drives) adjacent to areas where improvements are proposed. Any proposed mitigation within the state highway layout must be consistent with a Complete Streets design approach that provides adequate and safe accommodation for all roadway users, including pedestrians, bicyclists, and public transit riders. Guidance on Complete Streets design is included in the MassDOT Project Development and Design Guide. Where these criteria cannot be met, the proponent should provide justification and should work with the MassDOT Highway Division to obtain a design waiver. Public Transportation In Attachment B to the NPC ("Requested Modifications"), the proponent lists each of the comments relating to transit access and indicates whether



or not they remain applicable. The proponent has indicated that all of the MBTA related items remains applicable, though some of them will now focus on Beachmont Station as opposed to Suffolk Downs Station. The MBTA agrees with this assessment and asks that these scope items continue to apply as suggested by the proponent, but offers the following specific additional comments to highlight those issues that need particular attention and focus. Access to and From Station: In its comments on the DEIR, the MBTA asked for more specific information on how shuttle buses would access Suffolk Downs Station. The newly proposed configuration in the NPC is far closer to Beachmont Station than the former configuration was to Suffolk Downs Station. It appears that shuttle buses to the Blue Line Station are no longer proposed given the very short distance. The FEIR should confirm that this is the case. The FEIR however, should continue to provide information on how the pedestrian access from the station to the facility will be managed; with graphics (at a reasonable and appropriate scale) showing sidewalk widths and roadways sections so that the MBTA can review the pedestrian path from the station to the front doors of the facility.

In addition, the FEIR should clearly identify what types of improvements are being made to Winthrop Avenue, Washburn Avenue and Bennington Street in the vicinity of Beachmont Station. This is a heavily used pedestrian access area for transit riders. The MBTA needs to see how our existing customers access the neighborhood and how they will be able to get to and from the station. In addition, several MBTA buses board and alight customers at Beachmont Station. The station is also a frequent pick-up and drop-off location for The Ride customers. The FEIR should demonstrate how these existing pedestrian paths will operate in the future, as well as how MBTA buses will continue to operate in the area and how MBTA customers will transfer from Bus to Blue Line in the new street configurations. These issues were not a major consideration in the former siting, but are of increased importance in the new configuration. As stated in our comment letter on the DEIR, the MBTA appreciates the attention paid to this important pedestrian connection between transit and the facility and is very interested in working with the Proponent on how these connections can be even further enhanced to make this connection as safe, accessible, inviting, protective and pedestrian friendly as possible. The MBTA is eager to work with the Proponent, perhaps in collaboration with the Revere Transportation Department as well as neighborhood groups and advocates such as Walk Boston, on issues regarding lighting, way finding, shading, seating and other amenities along Winthrop Avenue, Washburn Avenue and Bennington Street. The MBTA strongly believes that the condition of these critical pedestrian connections between transit and the facility are key to encouraging as much transit usage as possible.

#### Parking

According to the NPC, the new development program would include a three-level parking garage beneath the casino floor that would provide a total of 4,470 parking spaces to accommodate casino patrons and employees. The FEIR should address how the number of parking spaces was derived and describe how the site parking would interact with the rest of the transportation system. The FEIR should also discuss how parking would be managed on site in order to make the TDM program more effective.

#### Transportation Demand Management

The FEIR should include an updated TDM program based on the specific characteristics of the MSM casino facility, if any. Otherwise, the FEIR should address most of the concerns or comments raised in the DEIR for the previous proposal to ensure the effectiveness of the TDM program in reducing site trip generation. If there are any significant modifications of the previous TDM commitment, the FEIR should clearly document the reasons for such modifications. The proponent should continue

consultation with appropriate MassDOT Divisions, including the Office of Transportation Planning, the Highway Division, and the MBTA during the preparation of the FEIR for the project.

### **COMMENTS FROM CITY OF EVERETT**

#### **3/6/2014 Letter from City of Everett re: Mohegan Sun Massachusetts NPC (EE #15006)**

Please accept this correspondence as the City of Everett's official comments to the Notice of Project Change ("NPC") filed by the Mohegan Sun Massachusetts ("Mohegan") for the proposed Mohegan Sun Casino located in Revere, Massachusetts. The City of Everett is currently reviewing Mohegan's recent filings that were included within Mohegan's application for a gaming license in Massachusetts and submitted to the Massachusetts Gaming Commission. In its filing to the Commission, Mohegan included the Draft Environmental Impact Report ("DEIR") from its predecessor, Suffolk Downs Sterling Suffolk LLC ("Suffolk Downs") and its proposed casino operator, Caesars Entertainment. Additionally, the City continues its evaluation of Mohegan's Notice of Project Change filed relative to the Suffolk Downs Stabling Area and Stormwater Improvements (EEA #14747).

Given the wholesale changes to its proposed project in Revere, one would have expected Mohegan to file an Environmental Notification Form ("ENF") outlining impacts of the newly proposed development. However, it appears that the schedules of the MEPA process and the licensing process established by the Gaming Commission have come into conflict and there was not adequate time for the filing of an ENF. As such, the MEPA filings of the previous applicant were included within the Mohegan application and the present NPC was filed asserting that the new, Revere-only project is a mere modification of the prior Sterling Suffolk project. This is not the case.

However, Mohegan goes even further to subvert MEPA's requirements and goals. The Mohegan NPC asserts that a single EIR—rather than a Draft EIR and Final EIR—would provide an adequate degree of public environmental impact review for its new casino development proposal.

In its NPC, Mohegan argues that the new and very different project does not need the thorough impact evaluation and public vetting of a Draft EIR as it is "smaller" and "the majority of environmental impacts will decrease." *See* Mohegan Sun Massachusetts Notice of Project Change. p. 1. Even if this was the case - which is not at all clear - even the brief and relatively ambiguous description of the new project within the NPC appears to refer to *increased* environmental impacts on wetlands resources, increased density and impervious area coverage within a now much smaller site and increased alteration of off-site land. In the absence of a Draft EIR that fully describes the actual project in question, alternatives to it, all relevant impacts and project specific mitigation measures, members of the public—potentially impacted municipalities included—will not have the opportunity to comment meaningfully on the environmental aspects of the Mohegan proposal.

As you are well aware, under MEPA regulations, a Draft EIR is required to provide a complete, stand-alone description of a project to assess its impacts precisely in order to allow agency and

public reviewers the opportunity to raise concerns and offer recommendations for improvement to project planning and design. In turn, the project proponent is required to respond directly to the concerns and recommendations articulated by the public by revising the project in the Final EIR. Regulations do allow for an expedited process, subject to the Secretary's approval, that allows for the filing of an Expanded Environmental Notification Form followed by a Single EIR by a project proponent; however, this process was never intended to be utilized with respect to such a large and far-reaching project with virtually unknown impacts(1) like the one proposed by Mohegan Sun Massachusetts. Mohegan is attempting to proceed to a Single EIR based solely on a brief NPC that provides limited or no details on project specific environmental impacts in lieu of meeting the normal standards of proceeding to a Single EIR. Simply put, the plans included within the Mohegan NPC are simply too conceptual to permit a realistic view of the project and its impacts, let alone intelligent and reasoned comments by the public. It is no solution to use the mechanism proposed by Mohegan to use a Single EIR to respond to earlier comment letters submitted in response to the Suffolk Downs DEIR (2) — comments made on a completely different project—as an appropriate way of addressing the actual concerns that agencies, local officials, community groups and citizens may have about a new project that has not yet been fully described, let alone adequately addressed.

In the absence of an adequate disclosure and assessment of the new project by Mohegan Sun, the purpose intended by the MEPA process and executed by your office cannot be served.

Furthermore, at my direction, the City has begun an investigation into the impacts of the proposed development by Mohegan in Revere based upon the limited information provided within Mohegan's application for a gaming license and upon the preliminary review of the City's consultants. Please note, however, that lack of funding and Mohegan's withholding of information has prevented the City from conducting a fulsome evaluation of the significant and adverse impacts that the project is expected to have on Everett and its residents.

For the reasons stated above and for good cause shown, the City of Everett respectfully requests that Mohegan be required to make the usual and customary MEPA filings of an ENF, Draft EIR and final EIR for its new proposed project in the City of Revere.

## E. CONSULTANT ANALYSIS

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### DEWBERRY ANALYSIS

**SUBJECT: Mohegan Sun Massachusetts (MSM)—Revere Casino Proposal  
Surrounding Community Traffic Evaluation for Everett**

At the request of City Point Partners, Dewberry Engineers Inc. (Dewberry) evaluated the petition from the City of Everett requesting to be designated as a “Surrounding Community” with respect to the Mohegan Sun’s Revere Casino proposal. As part of the development of casinos in Massachusetts, a community may be designated as a “Surrounding Community” per requirements specified in 250 CMR 125.00. The regulation enumerates a number of considerations or factors that are to be evaluated to guide the determination of the designation. Section 125.01(o2)(b.2) specifically calls for evaluating “...*whether the transportation infrastructure in the community will be significantly and adversely affected by the gaming establishment, ...*” and further identifies the 7 factors to be evaluated. This letter presents Dewberry’s evaluation of the 7 traffic and transportation impact factors of the MSM as they relate to Everett.

### **General Evaluation Process**

The impact factors specified in Regulation 250 CMR 125.01(o2)(b.2) that relate to transportation and traffic impacts are:

- **Ready Access:** This impact factor looks at the physical links between the project site and the surrounding community as well as the approximate distance to the center of the surrounding community.
- **Projected Changes in Level of Service (LOS) at Identified Intersections:** This impact factor defines the traffic operating condition of an intersection. Traffic engineers describe the quality of traffic flow on intersections in terms of levels of service (LOS), which range from A to F. LOS A indicates minimal motorist delay and good traffic flow, while LOS E and LOS F indicate unacceptable motorist delays including stop-and-go conditions. A change from one LOS to another does not necessarily signify a traffic related problem. Most reviewing agencies however typically require project proponents to mitigate project impacts on roadways and intersections if levels of service at these facilities fall under specified thresholds, especially if LOS E or F conditions are projected under Build conditions.
- **Increased Volume of Trips on Local Streets:** This impact factor examines the level of traffic volume increases that are expected to occur on local streets due to the Project. For this

factor, local streets include both non-interstate and interstate highways, state highways, arterials and major collector roads that pass through the community.

- **Anticipated Degradation of Transportation Infrastructure:** This impact factor examines the degradation of the community’s transportation infrastructure, in particular the condition of the roadway pavement, as a result of the project-generated vehicles and associated increased weight of vehicles (i.e. truck traffic during construction and from deliveries after construction).
- **Adverse Impacts on Transit Ridership and Station Parking:** This impact factor considers the increased transit use as a result of the project and its impacts on the current service in the community.
- **Significant Projected Vehicle Trip Generation for Weekdays and Weekends for 24 Hours:** This impact factor identifies the estimated number of vehicle trips that a project is expected to generate for a typical weekday and weekend, based on prevailing traffic engineering standard practices.
- **Significant Peak Vehicle Trips Generated on State and Federal Highways:** This impact factor identifies the estimated project related traffic that is expected to travel on State and Federal highways within the potentially affected community.

**Petitioning Community: Everett**

**Mohegan Sun Massachusetts (Applicant) Traffic Study**



**MAPC, MassDOT and EEA Comments**

- **Ready Access**

- **Projected Changes in Level of Service (LOS) at Identified Intersections**

The distributions and assignments of MSM trips along Route 16, based on the DEIR, are summarized in the above section on Applicant Traffic Study. The volume data represent the number of trips that are expected to be added to Route 16 in the vicinity of Sweetser Circle.

- **Increased Volume of Trips on Local Streets**

- **Anticipated Degradation of Transportation Infrastructure**

- **Adverse Impacts on Transit Ridership and Station Parking**

The DEIR forecasts 6,936 person-trips per day (total of inbound and outbound) will use public transit. These MSM-associated trips will add 11% of patrons (462 for the Friday peak hour and 457 for the Saturday peak hour) and 30% of employees (13 for Friday and 22 for Saturday) to existing transit services. The transit facilities available to serve them are the MBTA Blue Line Trains from Beachmont Station which is adjacent to the site, and local MBTA Bus Routes 119 and 120, which run approximately ¼ mile from the site.

The Blue Line runs between Bowdoin Station in Boston and Wonderland Station in Revere, but has no direct connections to Everett.

As cited in the DEIR Certificate, the impact of additional trips generated by MSM on MBTA Bus Routes 119 and 120 is expected to be minimal on an hourly basis. These bus routes are local to the Revere and Chelsea areas however, and do not involve Everett. The MBTA has requested further discussions on bus service to the site but not limited to modifications to existing express or local service to serve the site directly. The applicant has said that they intend to continue working with MBTA, MassDOT, MassRides and MassPort on this and other transit and parking issues.

- **Significant Projected Vehicle Trip Generation for Weekdays and Weekends for 24 Hours**

- **Significant Peak Vehicle Trips Generated on State and Federal Highways**

## **Concluding Opinion**

## **Dewberry Engineers**

## F. APPLICATION

### 2-28 TOTAL INVESTMENT OUTSIDE THE PROPERTY

#### 2-28-01 OFFSITE INFRASTRUCTURE INVESTMENT

Mohegan Sun Massachusetts (MSM) will invest significantly in the infrastructure outside the property lines of the destination resort project. The investment in offsite infrastructure improvements will be in excess of \$45,000,000 and includes the following components: (1) offsite traffic and safety improvements; (2) alternate mode transportation improvements; and (3) utility infrastructure improvements.

A summary, by category, is as follows:

Water infrastructure		\$5,600,000
Sewer infrastructure		\$6,400,000
Local road improvements	Donnelly Square	\$3,860,000
	Route 60/Revere Street	\$650,000
	Route 1A/Revere Street	\$650,000
	Beachmont Streetscape	\$500,000
	Furlong Drive	TBD
	Bennington/Saratoga	\$500,000
	Boardman/Saratoga	\$500,000
	Neptune/Frankfort/1A	\$2,500,000
	Bicycle improvements	\$140,000
<b>Subtotal</b>		\$9,300,000
State road improvements	Routes 1/16	\$2,100,000
	Route 16/Harris/RBP	\$1,600,000
	North Shore Road/RBP	\$1,000,000
	Mahoney Circle	\$400,000
	Brown Circle	\$175,000
	Copeland Circle/Route 1	\$1,250,000
	Route 1A/Curtis	\$1,100,000
	Route 1A improvements	\$25,000,000
<b>Subtotal</b>		\$32,625,000
Planning studies	Route 1/16 planning	\$400,000
	Route 1A planning	\$350,000
	Copeland Circle	\$100,000
	Route 60 planning	\$150,000



<b>Subtotal</b>		\$1,000,000
Transportation Demand Management measures		TBD
Electrical service		\$4,500,000
MBTA improvements		TBD
<b>TOTAL</b>	<b>\$59,425,000</b>	

Notes:

Due to the fact that some locations involve overlapping jurisdictions (such as at Revere Beach Parkway and Harris Street), these breakdowns are not precise. They appear in the most dominant category. They also include all costs of lighting, landscaping, buffer zones, pedestrian improvements (which in some cases, such as Mahoney Circle, are significant), and other improvements.

Given the preliminary nature of the design of some of these infrastructure elements, MSM notes that, while they represent our team's best professional judgment, the estimates are preliminary. The actual costs of each element may vary from the estimate provided.

Traffic congestion and safety improvements that address both impacts from the destination resort, as well as longstanding regional traffic issues will be made to the intersections of:

- Route 1/Route 16,
- Route 16/Route 145/Harris Street,
- Donnelly Square,
- North Shore Road/Revere Beach Parkway/Tomasello Drive,
- Mahoney (Bell) Circle, Brown Circle,
- Route 60/Revere Street,
- Copeland Circle/Route 1 and Winthrop Avenue,
- Route 1A (Boardman Street to Furlong Drive),
- Bennington Street/Saratoga Street,
- Boardman Street/Saratoga Street,
- Neptune Road/Chelsea Street, and
- Curtis Avenue/Route 1A.

Alternate mode transportation improvements will include expected improvements to the Beachmont MBTA Station (subject to additional discussions with the MBTA), the MBTA bus drop-off on the eastbound side of Winthrop Avenue and bicycle improvements that will connect Constitution Beach with Revere Beach. Utility infrastructure improvements will be made to the water and sewer distribution systems to the MSM site.

Consistent with the filings made for the Draft Environmental Impact Report, we have included concepts for improvements to certain infrastructure located entirely in the City of Boston. Given changes in the project since the environmental filing, it is possible that these improvements may not be necessary. They will continue to be studied and evaluated as a part of both the environmental permitting process for the MSM project and as a part of the negotiations with the City of Boston over the Surrounding Community Agreement with the City of Boston for the destination resort.

**Off-Site Transportation Improvements**

As part of the MSM development, the following offsite transportation improvements will be undertaken. A narrative of each improvement follows this table. Improvement locations are shown in attachment 2-28-02. Timing for the completion of the improvements is either included in the Revere Host Community

Agreement or will be addressed as a part of the environmental permitting for the Project.

Item	Location or Type	Action(s)
1	Route 1A Infrastructure Improvements	Route 1A improvements; add lanes and signals
2 a	Route 1/Route 16 Interchange	Ramp connection improvements
2 b	Route 1/Route 16 Interchange study	Develop Long Range Plan
3 a	Route 16/RBP/Harris Street Intersection	Add turn lanes, pedestrian accommodations, islands
3 b	Donnelly Square	Channelization, pedestrian access, timing
3 c	North Shore Rd/RBP/Tomasello Drive Intersection	Island, pedestrian accommodations, timing
3 d	Mahoney (Bell) Circle	Channelization, pedestrian access, timing, signs
3 e	Brown Circle	Signs, markings and channelization
3 f	Route 60/Revere Street Intersection	Detection, curbing and pedestrian accommodations
3 g	Route 1A/Revere Street Intersection	Timing, phasing, pedestrian access, signals
3 h	Copeland Circle/Route 1	Channelization, signals, pedestrian access
4	Beachmont Streetscape Improvements	Streetscape, lighting, planting, infrastructure improvements
5	Route 1A Planning	Long range plan for intersection improvements
6	Copeland Circle/Route 1 Planning	Long range planning
7	Route 60 Planning	Long range planning
8	Vehicular access to and from the Project	Improvement to Access Ways
9	MBTA and Bicycle Access Improvements	Beachmont station and Bicycle Access Improvements
10	Transportation Demand Management	Fund and Implement the TDM plan
11	Water and Sewer Improvements	Water and Sewer Upgrades
12	Bennington Street/Saratoga Street	Modify channelization, phasing and timing
13	Boardman Street/Saratoga Street	Reconfigure roundabout approaches
14	Neptune Rd/Chelsea St to NB Ramp/Neptune Road	Signal coordination, turn restrictions, islands
15	Curtis Street/Route 1A	Channelization, signage

*Narrative Description of Off-Site Transportation Improvements*

*1. Route 1A Infrastructure Improvements*

The Route 1A corridor adjacent to the property includes the Boardman Street/Route 1A intersection, which is a critical regional intersection. MSM has agreed to fund and cause the permitting, design and construction – in coordination with state and municipal agencies – of a so-called “Flyover” included as

part of the description in the attached Route 1A Figures included within Attachment 2-28-03, to alleviate and improve traffic conditions at the Boardman Street/Route 1A intersection and on Route 1A generally or such other equal or superior improvements and solutions to alleviate and improve traffic conditions along Route

1A in the vicinity of the Project as may be approved by the Massachusetts Department of Transportation (MassDOT) in consultation with the City of Revere (the Route 1A Infrastructure Improvements). In addition to addressing certain traffic and transportation impacts associated with the Project, the Route 1A Infrastructure Improvements are intended to address existing historic and background traffic issues of concern to the City of Revere, neighboring communities and the region.

## 2. *Route 1/Route 16 Interchange*

- a. MSM has agreed to fund and cause the permitting, design and construction of – in coordination with state and municipal agencies– a series of intermediate geometric improvements and new signalizations described conceptually in the attached Figures within Attachment 2-28-03, to provide access to Route 1 northbound from Route 16 westbound and to facilitate access from Route 1 southbound to Route 16 eastbound (collectively, the Route 1/Route 16 Intermediate Improvements). Consistent with the Boston Metropolitan Planning Organization’s Lower North Shore Transportation Improvement Study (prepared by the Central Transportation Planning Staff for the Massachusetts Highway Department in October of 2000) (the Lower North Shore Study), the Route 1/Route 16 Intermediate Improvements are intended to transfer some Project traffic and some regional traffic from the Route 60 corridor to Route 1/Route 16.
- b. In coordination with state and municipal agencies, MSM has agreed to fund and complete a study of the Route 1/Route 16 interchange for the purpose of planning additional improvements unrelated to the Route 1/Route 16 Intermediate Improvements. The study will be in the nature of a long-range plan for the interchange based on a conceptual plan consistent with long range plans for interchange developed in the Lower North Shore Study, with a particular focus on the implementation of “Alternative #3” as set forth in the Lower North Shore Study. The plan is limited to a study of the merits of the design and does not include a full review of the environmental planning process nor final design plans.

## 3. *Additional Roadway Improvements*

MSM has agreed to fund and cause the permitting, design and construction – in coordination with state and municipal agencies– of the roadway improvements described in Subparagraphs 3(a) through 3(h) below (the Additional Roadway Improvements) each to be generally consistent with the preliminary conceptual plans prepared by MSM, subject to reasonable adjustments and modifications. The Additional Roadway Improvements are as follows:

### a. *Route 16/Revere Beach Parkway/Harris Street Intersection:*

- i. Design and implementation of an optimal traffic signal timing and phasing plan, including split phasing;
- ii. Construction of two exclusive right turn lanes eastbound onto Revere Beach Parkway;

**iii.** Construction of pedestrian safety improvements to allow for safe pedestrian routes from Winthrop Avenue to Revere Beach Parkway in both eastbound and westbound directions, including associated sidewalk reconstruction, curb ramps, crosswalks and median improvements;

**iv.** Installation of an emergency vehicle preemption system; and

**v.** Not later than the one year anniversary of the opening of MSM to the general public, a study of alternative lane configurations for the Winthrop Avenue, Harris Street, Route 16 and Revere Beach Parkway approaches, along with the design and construction of alternative lane configurations in consultation with the City of Revere and necessary state agencies, which design and construction shall be completed not later than the two year anniversary of the opening of MSM to the general public.

*b. Donnelly Square:*

**i.** Design and implementation of an optimal traffic signal timing and phasing plan, including split phasing, for the weekday morning, weekday evening and Saturday midday peak periods;

**ii.** Redesign of the intersection to channelize traffic flow on the intersection approaches;

**iii.** Construction of permanent pedestrian crosswalks with new ADA accessible ramps at all crosswalks within the Donnelly Square area;

**iv.** Construction of aesthetic improvements within the Donnelly Square area, including new pavement markings;

**v.** Construction of landscaping improvements within the Donnelly Square area and along Winthrop Avenue leading to the Project entrance at Revere Beach Parkway and Tomasello Drive;

**vi.** Installation of an emergency vehicle preemption system;

**vii.** Widening of Winthrop Avenue west of Washburn Avenue to provide for the relocation of the MBTA bus stops in the eastbound and westbound lanes, to accommodate bus turn-in lanes and to provide for two lanes on Winthrop Avenue eastbound, subject to the approval of the MBTA and to complete the undergrounding of certain street lights along Winthrop Avenue.

*c. North Shore Road/Revere Beach Parkway/Tomasello Drive:*

**i.** Design and implementation of an optimal traffic signal timing and phasing plan at the intersection of North Shore Road and Revere Beach Parkway, including split phasing, to accommodate increased traffic movements associated with the Project;

**ii.** A study of alternatives for the provision of an exclusive right hand turning lane into the Tomasello Drive entrance to the Project;

**iii.** Construction of pedestrian safety improvements at the intersection and along Revere Beach Parkway, including traffic median improvements and potential realignment; and

**iv.** Installation of an emergency vehicle preemption system.

*d. Mahoney (Bell) Circle:*

**i.** Design and implementation of a comprehensive upgrade of the signs and pavement markings approaching and within Mahoney Circle, consistent with the Manual on Uniform Traffic Control Devices (MUTCD) standards, to improve motorist and pedestrian guidance and safety;

**ii.** Installation of ADA accessible ramps and associated sidewalk and median improvements within and around Mahoney Circle;

**iii.** Design and installation of channelization and signalization improvements within and around Mahoney Circle;

**iv.** Construction of upgrades to the traffic islands within Mahoney Circle, including new curbing and landscaping;

**v.** Widening Route 1A northbound approach to provide for additional storage capacity for movements continuing on Route 1A northbound;

**vi.** Installation of an irrigation system within all landscaped traffic islands; and

**vii.** Installation of an emergency vehicle preemption system.

*e. Brown Circle*

**i.** Design and implementation of a comprehensive upgrade of the signs and pavement markings approaching and within Brown Circle, consistent with the MUTCD standards, to improve motorist and pedestrian guidance and safety;

**ii.** Installation of ADA accessible ramps and associated sidewalk and median improvements within and around Brown Circle;

**iii.** Design and implementation of channelization and signalization improvements, including new pavement and directional markings and channelization islands, at the Route 107 northbound approach to Brown Circle.

**iv.** Construction of geometric and channelization improvements by extending existing islands and installing new islands to facilitate safer traffic flow.

*f. Route 60/Revere Street Intersection*

**i.** Design and implementation of an optimal traffic signal timing and phasing plan at the intersection, including split phasing.

**ii.** Construction of pedestrian safety improvements including new crosswalks and ADA accessible ramps

with associated sidewalk reconstruction.

*g. Route 1A / Revere Street Intersection:*

- i.** Design and implementation of an optimal traffic signal timing and phasing plan at the intersection, including split phasing, and signal upgrades, review the need for micro milling and resurfacing along the sidewalk/ramps;
- ii.** Construction of pedestrian safety improvements including new crosswalks and ADA accessible ramps with associated sidewalk reconstruction; and
- iii.** Installation of an emergency vehicle preemption system.

*h. Copeland Circle / Route 1*

- i.** Design and construction of channelization and signalization improvements (if possible) and signal interconnection work within and around Copeland Circle;
- ii.** Construction of pedestrian safety improvements including new crosswalks and ADA accessible ramps with associated sidewalk reconstruction; and
- iii.** Installation of an emergency vehicle preemption system.

**4. *Beachmont Streetscape Improvements***

MSM has agreed to submit to the City of Revere plans for streetscape, lighting, planting and other infrastructure improvements in and around the area bounded by Endicott Avenue, Winthrop Avenue, Unity Avenue, Crescent Avenue, Everard Avenue, Bennington Street and Washburn Avenue in Revere's Beachmont neighborhood (the Beachmont Streetscape Improvements). Upon receiving Revere's approval of the Beachmont Streetscape Improvements, MSM has agreed to fund and diligently cause the permitting, design and construction of the Beachmont Streetscape Improvements and will complete the Beachmont Streetscape Improvements not later than MSM's opening to the general public. In addition to improving traffic conditions, these amenities will beautify the neighborhood.

**5. *Route 1A Planning***

MSM has agreed to provide to the City of Revere a feasibility study, by a consultant or consultants reasonably approved by Revere, of various options available to improve traffic flow along Route 1A from Neptune Road in East Boston to the Revere/Lynn municipal boundary. The plan will study the merits of the design and does not include a full review of the environmental planning process nor final design plans.

**6. *Copeland Circle / Route 1 Planning***

MSM has agreed to provide to the City of Revere a long range plan for this segment of roadway

consistent with conceptual plans developed in the Lower North Shore Study, to be completed in conjunction with the plan for the Route 1/Route 16 interchange described above. The plan will study the merits of the design and does not include a full review of the environmental planning process nor final design plans.

#### 7. *Route 60 Planning*

MSM has agreed to provide to the City of Revere a long range plan for this segment of roadway consistent with conceptual plans developed in the Lower North Shore Study, to improve traffic flow along Route 60 between Route 1A and Route 1. The plan will study the merits of the design and does not include a full review of the environmental planning process nor final design plans.

#### 8. *Vehicular Access To and From the Project*

##### a. *Access Improvements*

MSM has agreed to fund and cause the permitting, design and construction – in coordination with state and municipal agencies– of significant improvements to the Project’s access ways at (i) the intersection of Furlong Drive and Route 1A and (ii) the intersection of Tomasello Drive and Winthrop Avenue.

##### b. *Prohibited Entrances/Exits*

MSM has agreed to not permit any vehicles, including, but not limited to, service vehicles, to enter or exit the Property directly from Winthrop Avenue (except for the current entrance to the Property at Tomasello Drive) or Washburn Avenue.

#### 9. *MBTA and Bicycle Access Improvements*

MSM has agreed to fund and cause the permitting, design and construction – in coordination with state and municipal agencies– of the MBTA and Bicycle Access Improvements described conceptually in the attached Figures within Attachment 2-28-03. Furthermore, MSM and the City of Revere shall coordinate with the MBTA throughout the MEPA process to consider whether improvements to the Beachmont Station and/or access thereto shall be undertaken.

#### 10. *Transportation Demand Management*

MSM has agreed to fund and implement an ongoing, comprehensive transportation demand management program (the TDM Program) designed to reduce single occupancy vehicle trips by both employees and patrons of MSM. As part of the TDM Program, MSM will provide regular reports regarding transportation matters concerning MSM, with such regular reports to be due on a monthly basis during the first two years after MSM’s opening to the general public and at least annually thereafter.

#### 11. *Water and Sewer Improvements*

MSM has agreed to fund and cause the permitting, design and construction – in coordination with state and municipal agencies, including the City of Revere – of the water and sewer upgrades required to service MSM.

### *12. Bennington Street/Saratoga Street*

The base design used for improvements at this location is to improve pedestrian conditions and to upgrade signal operations. At the intersection, the installation of a traffic island in the southwest quadrant and redirection of crosswalks for both the Bennington and Saratoga crossings is proposed, providing a compliant curb ramp for the Bennington Street cross in the southeast quadrant, lane use changes on the northbound Bennington Street approach (one right only and one through left), and median removal and median removal/relocation on the northerly leg of Bennington Street to allow a three lane southbound approach (two through and one left), with one through lane northbound. Signal phasing modifications are also proposed with minor support relocations. As part of this intersection work, improvements will be made to the Saratoga Street pedestrian crossing in the Barnes Avenue/Bayswater Street triangle area to provide a pedestrian warning beacon system and compliant crossing ramps. The base design concept assumes the City of Boston has all of the right of way necessary to make these improvements. This work is subject to the approval of the City of Boston.

### *13. Boardman Street/Saratoga Street*

The basic concept of a traffic circle has been maintained within this intersection with the 11 year old geometry upgraded to a more standard roundabout design. The circle diameter would be increased and splitter islands added where roadway widths permit. The curb line along the easterly side of Saratoga Street would be modified to significantly reduce the pavement area and the reclaimed roadway would be used for parking adjacent to the Saratoga Street residences. Pedestrian crossings would be relocated and generally pass through the splitter islands where available. The base design cost assumes that the City of Boston has all of the right of way necessary to make these improvements. This work is subject to the approval of the City of Boston.

### *14. Neptune Rd/Chelsea St to Northbound Route 1A Ramp Off-ramp*

This corridor has been split in two areas for the proposed improvement plan. The westerly section extends from Chelsea Street to Bremen Street and the easterly section extends from Bremen Street to Frankfort Street.

Within the westerly section, the plan creates a one-way couplet with Saratoga Street providing a one-way southbound corridor from Bremen Street to Neptune Road and Bremen Street one way northbound from Neptune Road to Saratoga Street. The curb line on the southeast corner of Chelsea Street and Saratoga Street would be modified (pavement area reduced) and a median would be added on Neptune Road from Chelsea Street to Bremen Street where two lanes would be provided – one left turn and one lane continuing to Bennington Street. Based on traffic count evaluation, provide stop control on Neptune Road only or multi-way stop control on all approaches. Given geometric concerns and heavy truck activity, traffic signal control is not a viable option. The base design concept assumes that the City of Boston has all of the right of way necessary to make these improvements. Approvals are required from the City of Boston. A neighborhood review process is also anticipated.



Within the easterly section the plan developed looks to increase capacity at the intersection by splitting the function of the overall intersection with the elimination of the westbound Neptune movement between the Route 1A northbound ramps and Bennington Street. All traffic from the ramp (except the U-turn to Route 1A southbound) and from Frankfort Street would be directed to Vienna Road and then allowed to access Bennington Street northbound and southbound via a new traffic signal and median break. Removal of the westbound movement from the Bennington Street intersection will allow increased time for the Bennington Street southbound phase, accommodating both the existing demand and the redirected movement from the closed link. The base design concept assumes that the City of Boston has all of the right of way necessary to make these improvements. Approvals are required from the City of Boston. A neighborhood review process is also anticipated.

#### *15. Route 1A Southbound at Curtis Street*

A proposal to realign Route 1A southbound has been developed in response to the request for improvements to this intersection. The realignment is intended to create an “exit” from Route 1A southbound to the Curtis Street area rather than the wide pavement area that currently exists. The relocation would be into a grass and tree area within the Route 1A median and provide for two continuous lanes for the southbound through movement. An island would be created within the current paved area of the exiting movement and through movement. Movement from the newly created ramp would intersect with the Curtis Street movement under single or multi-way stop control (to be evaluated) and the movement from the Curtis Street corridor onto Route 1A southbound would be in a free-flow condition to the third lane available south of the interchange area. The base design concept assumes that all work will be completed within the State Highway layout and that no right of way acquisition is necessary to make these improvements. This work is subject to the approval of MassDOT and the City of Boston.

### **2-28-02 OFFSITE IMPROVEMENTS LOCATION MAPS**



2-28-02: Figure A

## **4-08 PARKING**

### **4-09 TRANSPORTATION INFRASTRUCTURE**

Transportation infrastructure is of critical importance to the success of the destination resort. Efficient and well-planned infrastructure enhance the guest experience which starts with the arrival to the site, before setting foot inside the building, and ends with the departure from the site, long after leaving the building. \*Additionally, efficient and effective bus, taxi and passenger drop-off and satellite parking are crucial components of our plan to mitigate the impact of Resort-generated vehicle trips. Both taxi and valet drop off take place at main porte cochere,

which is the main entrance to the destination resort. To encourage the use of alternative transportation by employees, those employees that drive, will park in remote locations and will be brought to the site by shuttle. On site bicycle accommodations will be provided. The off-site parking area also accommodates service vehicles and tour buses (short term and overnight). There are no plans to offer refueling facilities. The Mohegan Sun Massachusetts Transportation Department will be on site 24/7 and will be able offer disabled vehicle assistance to guests in need. The destination resort enjoys the unique advantage of being directly adjacent to a rapid transit line while at the same time being serviced by multiple bus routes. This intermodal access is unique among proposed gaming sites in the Commonwealth. The applicant maximizes those attributes through a comprehensive transportation mitigation program that includes a focus on public transit, roadway improvements, a robust TDM program and alternative mode access.

#### **4-09-01 TRANSPORTATION INFRASTRUCTURE**

Transportation infrastructure is of critical importance to the success of the destination resort. Mohegan Sun Massachusetts (MSM) is unique in that it enjoys a site that has identified access points not dependent on the acquisition of currently publicly-owned land. It can therefore comprehensively plan its access to the site and can make definitive commitments pertaining to how the resort interacts with and utilizes the region's existing infrastructure, while at the same time planning for improvements to enhance site access and improve current chronic traffic congestion at key locations.

Efficient and well-planned infrastructure enhances the guest experience that starts with the arrival onto the site, before setting foot inside the building, and ends with the departure of the site, long after leaving the building. Additionally, efficient and effective bus, taxi and passenger drop-off and satellite parking are crucial components of our plan to mitigate the impact of resort-generated vehicle trips. Plans detailing on-site transportation infrastructure and features are provided as attachment 4-09-05.

MSM is an externally facing resort. As such, MSM is diligently working to facilitate patron visits to regional attractions and local businesses. A visit to MSM is not complete without visits to the many destinations that are offered in the Host Community and surrounding cities and towns. Attachment 4-09-03 is a plan showing regional features and attractions that, consistent with its externally facing strategy, MSM is working to integrate into the resort. Attachment 4-09-04 is a regional map. MSM is currently in discussions with more than ten nearby communities regarding their status. Naturally, MSM plans to integrate the resort into the Revere community and to take maximum advantage of Revere Beach and Revere's superb access to regional roadways and to the MBTA's public transportation system.

Other examples of MSM's outreach include its partnership with the Citi Center for the Performing Arts in Boston's theater district, plans for ground shuttles to nearby business districts and local cultural and tourist attractions in Boston, Cambridge and elsewhere, its

unique points program that will permit patrons to make purchases at nearby businesses, and plans for a tourism connection with the City of Salem. As part of its Points Partnership Program, described at length in responses to Questions 3-24, 5-6, and elsewhere in the Application, numerous tourist attractions, such as witch and pirate history museums and the Salem Trolley have expressed interest in joining this program so that MSM patrons may spend points as a cash equivalent at these destinations. Similarly, patrons will spend points earned at the resort at local restaurants and shops in surrounding cities and towns. Dozens of local retailers have enrolled interest in this program. MSM will ensure that local businesses will be well-served by its external facing transportation linkages. The Points Partnership Program is a one-of-a-kind financial relationship with local businesses that, to our knowledge, will not exist at other proposed gaming establishments in the Commonwealth, and would, in fact, be unique to MSM throughout the entire country.

While the adjacent Suffolk Downs racetrack, New England's last remaining thoroughbred racetrack, is not an amenity of the resort, it is an adjacent facility that MSM will take full advantage of. Attached as 4-09-06 is a letter from the owners of Suffolk Downs to the Racing Division of the Massachusetts Gaming Commission in which the owners commit to continue thoroughbred racing at Suffolk Downs in the event MSM is awarded a category 1 license. Plans are therefore being made to foster racing as a nearby regional amenity and attraction that will offer patrons a unique experience while at the same time helping to protect an important Massachusetts industry and hundreds of direct and indirect jobs.

With regard to transportation infrastructure, one of the critical infrastructure features of the resort site is its proximity to the Beachmont MBTA rapid transit station on the Blue Line and the bus stops on Winthrop Avenue. The easy access to the T and bus service is a unique advantage of this project, which allows for substantial reduction of overall vehicular traffic demand and lessens the impacts on the neighboring streets. An enhanced pedestrian crosswalk is planned at the corner of Winthrop Avenue and Washburn Avenue to ensure the safety of the guests arriving by the Blue Line. A dedicated bus layby lane is planned on the eastbound side of Winthrop Avenue to improve the current traffic flow. The destination resort incorporates a pedestrian entrance at this corner connecting directly into the retail and portion of the resort gaming floor and considers this to be an important entry point into the site.

Further, the destination resort is located within a metropolitan area where taxis are heavily utilized. All taxis will be directed from the main entrance roundabout to the porte cochere for passenger drop-offs and pick-ups. The entrance at the porte cochere provides direct and convenient access to the gaming floor and hotel lobby, retail lobby, boutique hotel and flexible meeting center lobby. Taxi queuing space will be provided by the porte cochere. Taxi availability will be coordinated with the City of Revere and will be one of the issues to be addressed in MSM's discussions with the Massachusetts Port Authority.

Valet parking service is also offered for the destination resort. Guests who wish to take

advantage of the valet service will be directed to arrive at the porte cochere where a pair of ramps will connect to the valet parking area located on the immediate floor below to maximize efficiency. The valet parking operation utilizes a computerized system to record the location of the vehicles so cars can be retrieved speedily and efficiently.

Consistent with its dedication to sustainability, MSM will offer free bicycle parking spaces located within the building for patrons. A number of convenient bike racks are also located along the perimeter of the destination resort. The destination resort also commits to accommodating bike share stations on site when the program is rolled out to the Revere area. As a reference for further commitments to MSM’s sustainability, the project’s LEED Checklist is provided as 4-09-02.

To encourage the use of alternative transportation by resort employees, an on-site bicycle parking and extremely limited on-site employee parking are planned. Showers and changing facilities are also provided on site for the employees. These objectives will be further advanced by a robust Transportation Demand Management (TDM) program described below and a “guaranteed ride home” program for potentially impaired patrons that will be implemented at the destination resort. Mohegan Sun has a successful track record running bus programs in its other facilities. A designated bus loading/unloading area is planned within the destination resort inside the parking garage. Buses are directed from the main entrance roundabout to the designated loading area through well-planned roadway system. A bus-waiting lobby is immediately adjacent to the loading area, providing sufficient seating and amenities, such as, signature shop, café, coat check, and restrooms. The bus lobby shares the same level of quality, in terms of lighting, interior design and amenities. Through a pair of escalators, the guests ascend the gaming floor and the rest of the destination resort.

There are no plans to offer refueling facility on site. Sundry stores and convenient stores will be located within the retail area, adjacent to the main entrances to the resort for the convenience of the guests.

The MSM Transportation Department will be on site 24/7 and will be able offer disabled vehicle assistance to the guests in need.

As stated, the site enjoys the unique advantage of being directly adjacent to one of the MBTA’s primary rapid transit lines while at the same time being serviced by multiple bus routes. This intermodal access is unique among other proposed gaming resorts in the Commonwealth. MSM will fully maximize those attributes through a comprehensive transportation mitigation program that includes a focus on public transit, roadway improvements, a robust TDM program and alternative mode access.

#### **4-23 EGRESS FROM GAMING ESTABLISHMENT SITE**

#### **4-24 ADEQUACY OF EXISTING TRANSPORTATION INFRASTRUCTURE**

. Within the Route 1A corridor, the controlling intersections are Boardman Street and Mahoney Circle. At Boardman Street, the northbound Route 1A approach experiences considerable queuing and would be impacted with the addition of resort-related traffic.

Improvements are also proposed on Winthrop Avenue. Other highway infrastructure improvements are proposed at the Route 1/Route 16 interchange, to provide a Route 1 southbound connection to Route 16 east and from Route 16 west to Route 1 north, pedestrian and roadway safety and capacity improvements in the Route 16 corridor and other improvements detailed in the Revere HCA. Transit-related infrastructure improvements are under consideration at Beachmont Station. Pedestrian and bicycle improvements are proposed throughout the area, including bicycle lanes along the Bennington Street and connecting corridors between Constitution Beach and Revere Beach.

#### **4-24-01 ADEQUACY OF EXISTING TRANSPORTATION INFRASTRUCTURE**

Adequacy of Existing Transportation Infrastructure.

A detailed answer is provided for each mode of transportation, including auto/vehicle, public transit, walking and bicycling. Each detailed answer is provided as Attachment 4-24-02, Attachment 4-24-03, Attachment 4-24-04, Attachment 4-24-05 and Attachment 4-24-06 and Attachment 4-24-07.

This proposal/plan will be modified as the project proceeds through the Site Plan Review process with the City of Revere, review with the Revere Conservation Commission and based on guidance and requirements provided by MassDOT, DCR and other stakeholders whose views and approvals may affect the applicant's site design.

#### **4-24-02 ROADWAY NETWORK**

This attachment describes existing and future (with and without the proposed Resort) transportation capacity analysis conditions within the local study area of the project, specifically the local roadway infrastructure utilized for access/egress to the site.

##### Existing Conditions Study Area

The study area is presented in Figure A. The study intersections (under signal control unless otherwise noted) include the following:

1. Route 1A at Suffolk Downs/Tomasello Drive (unsignalized/signalized with Project);
2. Route 1A at Furlong Drive (unsignalized);
3. Winthrop Avenue (Route 145) at Route 1A southbound On-Ramp;

4. (a) Winthrop Avenue (Route 145) at North Shore Road;  
(b) Winthrop Avenue (Route 145) at Suffolk Downs (Tomasello Drive);
5. Bennington Street/State Road at Winthrop Avenue;
6. Bennington Street at Saratoga Street;
7. Boardman Street at Route 1A;
8. Winthrop Avenue (Route 145) at Revere Beach Parkway (Route 16)/Harris Street;
9. (a) Route 60 (American Legion Highway) at Bell Circle;  
(b) Route 1A (VFW Parkway) at Bell Circle; (c) Route 16 and Route 1A at Bell Circle;  
(d) Beach Street at Bell Circle;
10. Ocean Avenue at State Road/Revere Beach Parkway;
11. Eliot Circle (roundabout);
12. Route 1A at Jughandle;
13. (a) Bennington Street at Neptune Road;  
(b) Neptune Road at Route 1A NB off-ramp;
14. Butler Circle (roundabout);
15. Revere Street at Route 60;
16. Brown Circle (roundabout);
17. Copeland Circle (three weave locations, three merge locations)
18. Route 1/Route 16 Interchange (three merge locations);
19. Route 16 (Revere Beach Parkway) at Garfield Avenue/Webster Avenue;
20. Route 1A northbound at Waldemar Avenue (unsignalized/signalized with Project);
21. Bennington Street at Crescent Avenue (unsignalized);
22. Route 1A SB at Curtis Street (unsignalized);
23. Neptune Road at Saratoga Street (unsignalized);
24. Neptune Road at Bremen Street (unsignalized);
25. Route 1A (North Shore Road) at Wonderland MBTA Station;
26. Route 1A (North Shore Road) at Revere Street;
27. Route 60 (Squire Road) at Charger Street; and
28. Route 60 (Squire Road) at Sigourney Street/ Mall Driveway.

Although the majority of study intersections in the Project vicinity operate under traffic signal control, three locations on Route 1A (Furlong Drive, Tomasello Drive, and Waldemar Avenue) are under stop control. The expanded study area includes four additional unsignalized locations (Bennington Street at Crescent Avenue, Route 1A SB at Curtis Street, Neptune Road at Saratoga Street, and Neptune Road at Bremen Street), and three rotaries or roundabouts (Eliot, Butler, and Brown Circles). Despite its name, Bell Circle (the intersection of Routes 1A, 16, and 60 (a.k.a. Mahoney Circle) is not a roundabout or rotary, but rather it is controlled by a set of four traffic signals. Similarly, Copeland Circle is not a roundabout, but comprises a series of weave and merge sections within its rotary-style layout. Because it comprises a series of on- and off-ramps, the Route 1/Route 16 interchange also involves merge locations.

## Data Collection

To evaluate the existing operational conditions of the study area, existing traffic volumes were established and validated by conducting several count programs. Initially, bi-directional daily traffic volume data were collected for an entire week in June 2010 along Route 1A (two locations), Route 16, and Route 60, the key roadways surrounding the Project site.

Supplemental daily counts were performed for a full week in July 2012 along Route 1A, as well as at the three site access roads: Tomasello Drive at Route 1A, Tomasello Drive at Route 145, and Furlong Drive.

In addition to daily traffic volumes, manual TMCs were conducted in June 2010 at the majority of the study area intersections. These counts were conducted during the critical Friday evening commuter peak hours and Saturday afternoon hours to analyze the worst case scenario for projected Resort trip generation. Where 2010 intersection data was not available, peak period TMCs were performed in April and May 2013, as well as for all additional intersections required in the Secretary's Certificate on the ENF.

To validate the 2010 traffic counts, MassDOT asked that the ATR counts performed at the four arterial locations in 2010 be repeated to determine if traffic levels generally have increased or decreased since that time. ATR counts were performed over the course of a full week in April 2013 at the same locations as the 2010 ATR counts, as follows:

1. Route 1A south of Furlong Drive;
2. Route 1A north of Route 145;
3. Route 60 north of Bell Circle; and
4. Route 16 west of Route 145.

A comparison of 2010 and 2013 daily volumes is presented in Table 4-24-02-A, including average weekday, Friday, and Saturday volumes. As shown, weekday average daily traffic volumes have decreased consistently between 2010 and 2013, ranging from 2 to 4 percent on Route 1A to 7 percent on Route 60 and 12 percent on Route 16. A similar, but higher, pattern of decreasing traffic volumes between 2010 and 2013 is shown for Friday, with decreases ranging from 3 to 17 percent. Saturday daily volumes between 2010 and 2013 have increased by 3 percent on Route 1A south of Furlong Drive, but have decreased by 1 percent north of Route 145 and by 5 percent on Route 16.

#### **4-25 TRAFFIC MITIGATION**

The site enjoys the unique advantage of being directly adjacent to one of the MBTA's primary rapid transit lines while at the same time being serviced by multiple bus routes. Mohegan Sun Massachusetts maximizes those attributes through a comprehensive transportation mitigation program that includes a focus on public transit, roadway improvements, a robust TDM program and alternative mode access. These programs have been vetted through the Draft EIR process and continue under discussion with regulatory agencies as the environmental review process continues.

#### **4-25-01 TRAFFIC MITIGATION**



## **Traffic Mitigation**

The site enjoys the unique advantage of being directly adjacent to one of the MBTA’s primary rapid transit lines while at the same time being serviced by multiple bus routes. Mohegan Sun Massachusetts (MSM) maximizes those attributes through a comprehensive transportation mitigation program that includes a focus on public transit, roadway improvements, a robust TDM program and alternative mode access. These programs have been vetted through the DEIR process and continue under discussion with regulatory agencies as the environmental review process continues.

Finally, a “Beach to Beach” bicycle connection is planned for Bennington Street in East Boston and Revere.

A detailed answer is provided for each category of improvements, including site access, transportation infrastructure, transit, TDM, pedestrian and bicycle accommodations. Each detailed answer is provided as Attachment 4-25-02, Attachment 4-25-03, Attachment 4-25,04, Attachment 4-25-05, Attachment 4-25-06, Attachment 4-25-07, and Attachment 4-25-08.

Attachment 4-25-09 includes various figures referenced in attachments 4-25-02 through 4-25-08.

### **4-25-02 SITE ACCESS IMPROVEMENTS**

Site access will be provided from two regional corridors – Route 1A (Lee Burbank Highway) and Winthrop Avenue (S.R. 145). From Route 1A the site will be primarily accessed via Furlong Drive (a corridor serving retail uses adjacent to Suffolk Downs), although the proponent acknowledges that third parties and the public have rights to access the site via Tomasello Drive directly from Route 1A as well (the existing entrance and exit to the Suffolk Downs racetrack). Winthrop Avenue access will be via the existing signal controlled Tomasello Drive which is part of the overall North Shore Road/Tomasello Drive/Winthrop Avenue intersection in Revere.

The commitment to the Route 1A improvements is recognized in the HCA with the City of Revere. To provide some context on the needed roadway construction timing, the Resort is expected to be fully completed approximately 30-33 months after the start of construction, and the improvements will be constructed to support the Resort on a schedule consistent with the Project’s various agreements and permitting obligations.

During the course of the preliminary evaluation of the Route 1A solution, a range of options was identified, encompassing various combinations of flyover and at-grade solutions, some of which explored the feasibility of a southbound flyover at a later time if a northbound flyover is built as part of the project. After initial discussions with MassDOT, the options were expanded to include additional alternatives designed to fully explore the range of possible improvements to roadway operations. Subsequent discussions with MassDOT resulted in the elimination of infeasible options, largely due to environmental and land impacts, and the potential need for modifications to accepted MassDOT design standards (design exceptions). This screening process reflected pre-existing constraints within the corridor north of Tomasello Drive resulting from wetlands adjacent to the roadway and impacts to nearby improved properties.

As part of a Draft Environmental Impact Report filing dated September 3, 2013, a series of alternatives were identified, plans prepared and analysis completed. Three at grade alternatives and four grade separated alternatives (one of which provides three options) were evaluated extending from south of Boardman Street northerly through the “Jughandle” signal.

The Draft EIR Certificate issued by MEPA reduced this list for review. Recognizing that options may be adjusted as the permitting process proceeds, the proponent intends to continue to study all options recommended for further review by MEPA in cooperation with MassDOT and the Cities of Revere and Boston. These include a modified at-grade solution, a Boardman Street flyover solution east of the existing Route 1A corridor, a similar flyover solution east of the existing Route 1A corridor with a future southbound flyover option (southbound flyover to be constructed later by others), a northbound flyover constructed within the existing northbound travel way with the collector/distributor (C/D) road fully to the east (and a southbound flyover to be constructed later by others), and a multiple flyover alternative at Boardman and Tomasello Drive/Jughandle (and a southbound flyover to be constructed later by others.)

Analyses for each option were conducted for the morning, evening and Saturday peak conditions for the existing, 2022 Build and 2032 (design year) Build conditions. In evaluating the traffic operations for each option, the existing conditions analysis for the Route 1A/Boardman Street must be carefully considered. Under existing conditions extensive queuing and delay are experienced on various approaches depending on time of day. One goal of the project is to address this current need. Additional data are being collected per a MassDOT request to further evaluate queuing issues in the Route 1A corridor approaching Boardman Street northbound.



4-24: Figure A

**4-25-03 CITY OF REVERE IMPROVEMENTS**

As part of the discussions for the Host Community Agreement (HCA) the City of Revere has requested several improvements to the area’s transportation infrastructure. The primary transportation infrastructure improvement associated with the development is modifications in the Route 1A corridor in the area of Boardman Street in East Boston through Furlong Drive in Revere, which is being developed in coordination with MassDOT. As a part of a comprehensive assessment of key intersections and routes in the region, the City asked that existing regional traffic and safety issues along the Route 60 and Route 1 corridors be addressed by providing improved all--movement connections between Route 1 and Route 16. In response, conceptual

plans for new ramp connections at the Route 1/Route 16 interchange and improvements along the Revere Beach Parkway corridor are included in the City of Revere HCA. The Route 1/Route 16 ramp connections, which also appear in the Surrounding Community Agreement executed with the City of Chelsea would be supported by additional improvements at the Route 16/Route 145/Revere Beach Parkway intersection at Harris Street.

- ◆ Design and implementation of an optimal traffic signal timing and phasing plan, including a review of and replacement of vehicle detection as necessary, at the intersection. The evaluation will include a review of split phasing; and
- ◆ Construction of pedestrian safety improvements including new crosswalks and ADA accessible ramps with associated sidewalk reconstruction;

A concept plan is shown in Figure K. Approval will be required from MassDOT and the City of Revere.

#### Route 1A at Revere Street

Intersection improvements proposed for this location, in accordance with the Revere HCA, include the following:

- ◆ Design and implementation of an optimal traffic signal timing and phasing plan including a review of and replacement of vehicle detection as necessary. The evaluation will include a review of split phasing;
- ◆ Construction of pedestrian safety improvements including new crosswalks and ADA accessible ramps and associated sidewalk reconstruction; and
- ◆ Implementation of an emergency vehicle pre-emption system to supplement the existing pre-emption system from the fire station to the north on Route 1A;

Approval will be required from MassDOT and the City of Revere.

#### Copeland Circle

- ◆ Design and construction of channelization and signalization improvements within and around Copeland Circle;
- ◆ Construction of pedestrian safety improvements including new crosswalks and ADA accessible ramps with associated sidewalk reconstruction; and

- ◆ Installation of an emergency vehicle pre---emption system.

Approval will be required from MassDOT and the City of Revere and could include the design and construction of up to four traffic signals on the approaches to the Circle, traffic signal coordination and roadway widening (more specifically the southbound Route 1 off---ramp to the Circle, and possibly the Route 1 northbound off ramp).

#### **4-26 PARKING FACILITIES**

Due to the proximity of the Beachmont MBTA Station and MSM’s ground shuttle program, fewer parking spaces will be required than would be in a less transit-connected area.

The parking has been designed to maximize guest convenience and minimize their travel from vehicle to venue. The structured parking will be directly below casino, retail, hotel and entertainment venues. Guests will be able to park almost directly below their venue. In our design we have located elevators to quickly and easily convey guests from the parking areas to the main level. Elevator and lobbies will be designed in with the high quality finish materials common throughout the resort. An enclosed bicycle parking area within the building, as well as convenient bike racks along the perimeter of the resort, will also be provided for both patrons and employees. Electric charging stations and preferred parking spaces will also be located within the resort.

#### **4-34 EGRESS FROM GAMING ESTABLISHMENT SITE**

...Route 1A (William F. McClellan Highway/Lee Burbank Highway) will be the primary vehicle access and egress point accommodating approximately 80% of Mohegan Sun Massachusetts’ (MSM) the resort’s arrivals and departures. Improvements to Route 1A and to the Furlong Drive access point to accommodate traffic safely and efficiently are being developed in coordination with MassDOT and the City of Revere.

Revere Beach Parkway will provide secondary access via an existing access driveway (Tomasello Drive) in Revere, with modifications to the driveway configuration, improvements to the pedestrian environment, and an update of the existing traffic control signals. Bennington Street, a north-south corridor, connecting the Route 1A corridor with Revere Beach Parkway, is immediately east of the MBTA Blue Line, which runs in a north-south direction east of the site.

The site is well served by public transportation. The Blue Line provides access from Boston’s central subway system and Wonderland Station in Revere at Beachmont Station. Local MBTA bus services include Route 119 along Winthrop Avenue and Revere Beach Parkway with service between Revere and Winthrop via Beachmont Station.

#### **5-01 INFRASTRUCTURE COSTS**

MSM will finance all infrastructure improvements to enhance the surrounding roadway network, accommodate additional resort-generated trips, and facilitate access to the resort on public transportation by expanding the Beachmont MBTA transit station. I MSM is in discussions with additional communities regarding certain additional improvements that may be completed as a part of the project.

### **5-01-01 INFRASTRUCTURE COSTS**

The host community, the City of Revere, will incur no infrastructure costs from its own budget to pay for infrastructure improvements associated with the construction and operation of the gaming establishment, many of which address long standing traffic issues in the area. Mohegan Sun Massachusetts, LLC (MSM) will finance all infrastructure improvements to enhance the surrounding roadway network, accommodate additional resort-generated trips, and facilitate access to the resort on public transportation by expanding the Beachmont MBTA transit station. In fact, the infrastructure and traffic improvements that MSM will complete will exceed the impacts of the destination resort and will benefit the region for years to come by remedying longstanding background traffic conditions. MSM's commitment to these infrastructure improvements are set forth in the Host Community Agreement (HCA) with the City of Revere, which is included as Attachment 5-04-01. Infrastructure improvements that will be completed in connection with the gaming establishment are anticipated to cost MSM between \$42 million and \$50 million. These infrastructure improvements will greatly improve regional transportation corridors to the benefit of all surrounding communities.

Additionally, MSM has agreed on the terms of a Surrounding Community Agreement with the City of Chelsea. As described in greater detail below, MSM will fund, design and construct, in coordination with state and municipal agencies, substantial improvements to remedy traffic congestion at the Route 1/Route 16 Interchange. This Interchange is located in both the Cities of Revere and Chelsea, and therefore, is a critical infrastructure improvement project for not just Revere and Chelsea, but the entire region. The estimated cost to be incurred by MSM for these Route 1/Route 16 improvements is \$2.1 million, plus \$400,000 that MSM has committed for a planning study related to future projects. The Surrounding Community Agreement also ensures that the City of Chelsea will receive \$2.5 million in Community Impact Fee payments annually (and increased by the amount of the Consumer Price Index each year) from MSM for which the City may allocate additional funds for infrastructure improvement. To the extent that there may be additional infrastructure costs in surrounding communities associated with the resort, MSM is fully committed to work with surrounding communities to mitigate any impacts, and remains in conversation with many potential surrounding communities. Additional information on infrastructure improvement costs is found in the responses to Questions 3-31, 4-23, 4-24, 4-25, 5-2, 5-4, 5-33, and 5-34 to MSM original application.

While the adjacent Suffolk Downs racetrack, New England's last remaining thoroughbred racetrack, is not an amenity of the resort, it is an adjacent facility that MSM will take full advantage of. Attachment 5-01-05 is a letter from the owners of Suffolk Downs to the Racing Division of the Commission in which the owners commit to continue thoroughbred racing at Suffolk Downs in the event MSM is awarded a category 1 license. Plans are therefore being made, consistent with the goal of the Gaming Act, to foster racing as a nearby regional amenity and attraction that will offer patrons a unique experience while at the same time helping to protect an important Massachusetts industry and hundreds of direct and indirect jobs.

The infrastructure improvements are outlined in detail in the HCA and shown in further detail in Attachments 5-01-02 and 05-01-03. These include without limitation (all infrastructure costs are approximate):

1. Route 1A Infrastructure Improvements (\$25 million). MSM will fund, design and construct, in coordination with state and municipal agencies, improvements to alleviate traffic conditions along Route 1A and certain traffic impacts associated with the gaming establishment, options of which include a so-called "FlyOver" bridging an overpass at Route 1A and Boardman Street to meet grade south of Waldemar Avenue or atgrade widening and signalization changes to the Route 1A and Boardman Street intersection and points north of Boardman Street through to Furlong Drive. The estimated cost of these improvements is \$25 million. The options being evaluated for this improvement are shown in further detail in Attachment 05-01-04.

2. Route 1/Route 16 Interchange (\$2.5 million). MSM will fund, design and construct, in coordination with state and municipal agencies, intermediate geometric improvements and new signalizations to provide access to Route 1 northbound from Route 16 westbound and facilitate access from Route 1 southbound to Route 16 eastbound. The estimated cost of these improvements is \$2.1 million. MSM will also fund a study of the Route 1/Route 16 interchange for the purpose of planning additional improvements. The cost of this study is estimated to cost \$400,000.

3. Route 16/Revere Beach Parkway/Harris Street Intersection (\$1.6 million). MSM will design and construct additional lanes and alternative lane configurations, implement optimal traffic signal timing, and build pedestrian safety improvements. The estimated cost of these improvements is \$1.6 million.

4. Donnelly Square (\$3.86 million). MSM will design and implement optimal traffic signal timing and split phasing for weekday morning, weekday evening and Saturday midday peak traffic, widen Winthrop Avenue, channelize traffic flow, construct ADA accessible pedestrian crosswalks, placing certain utilities underground, and beautify area landscaping. The estimated cost of these improvements is \$3.86 million.

5. North Shore Road/Revere Beach Parkway/Tomasello Drive Intersection (\$1 million). MSM will design and implement optimal traffic signal timing and split phasing to accommodate resort-generated traffic, and construct pedestrian safety improvements. The estimated cost of these improvements is \$1 million.

6. Mahoney (Bell) Circle (\$400,000). MSM will widen the Route 1A northbound approach to accommodate additional traffic, design and construct channelization and signalization improvements, and make sidewalk, and median and traffic island improvements. The estimated cost of these improvements is \$400,000.

7. Brown Circle (\$175,000). MSM will design and implement a comprehensive upgrade of channelization, signalization and pavement markings, construct sidewalk, median, and island improvements. The estimated cost of these improvements is \$175,000.

8. Route 1A / Revere Street Intersection (\$650,000). MSM will design and implement optimal traffic signal timing, an intersection phasing plan, signal upgrades and new crosswalks. The estimated cost of these improvements is \$650,000.

9. Copeland Circle/Route 1 (\$1.25 million). MSM will design and construct channelization and signalization improvements and signal interconnection work, build pedestrian safety improvements including new crosswalks and ADA accessible ramps. The estimated cost of these improvements is \$1.25 million.

10. Beachmont Streetscape Improvements (\$500,000). MSM will complete numerous additional streetscape and infrastructure improvements in the Beachmont neighborhood in the City of Revere. The estimated cost of these improvements is \$500,000.

11. Route 1A Planning (\$350,000). MSM will provide to the City of Revere a feasibility study of additional options to improve traffic flow along Route 1A from Neptune Road to the Revere/Lynn municipal boundary. The estimated cost of this study is \$350,000.

12. Copeland Circle / Route 1 Planning (\$100,000). MSM will complete for the City of Revere a long-range plan for traffic improvements to the Copeland Circle area. The estimated cost of this plan is \$100,000.

13. Route 60 Planning (\$150,000). MSM will provide for the City of Revere a long-range plan for improving traffic flow along Route 60 between Route 1A and Route 1. The estimated cost of this plan is \$150,000.

14. In addition, MSM will fund, design, and construct:

- Significant improvements to access ways to the destination resort.



- Bicycle access improvements in areas around the gaming establishment, including a commitment to participate in the region’s Bike Share program when it is expanded to the area.
- Improvements to the MBTA’s Beachmont Station, in coordination and consultation with the MBTA.
- A “Transportation Demand Management program” to reduce single occupancy vehicle trips by employees and patrons of the resort.
- All water and sewer upgrades necessary to service the resort, including the payment of all related fees.

Finally, during operation, MSM has committed to address through subsequent agreement with the City of Revere any transportation impacts that may still require mitigation notwithstanding these or other improvements that will be made during the licensing and permitting process for the resort.

There are additional intersections and locations in Boston that have been the subject of conversations with City of Boston officials in the past and that were included in Suffolk Downs’ prior Host Community Agreement with Boston.

While a portion of the Route 1A infrastructure improvements discussed above are partially located in Boston, discussions with City of Boston officials have not yet advanced to the point of confirming the full complement of improvements that had been discussed. MSM expects to execute a Surrounding Community Agreement with the City of Boston in the near future. All of the improvements to which MSM has committed are subject to the review and approval of the entity that owns the improvement. A summary of the off-site infrastructure costs is as follows:

Description	Estimated costs
<b>Revere Improvements</b>	
Route 1 / Route 16 Mid-Term improvements	\$2,100,000
Route 1 / Route 16 N/B Ramp (Planning Study Only)	\$400,000
Route 16 / Revere Beach Pkwy/Harris Str.	\$1,600,000
Donnelly Square	\$3,860,000
North Shore Rd. / Revere Beach Pkwy / Tomasello Dr.	\$1,000,000
Mahoney Circle (Bell Circle)	\$400,000
Brown Circle	\$175,000
Route 60/Revere Str.	\$650,000
Route 1A/Revere Str.	\$650,000
Beachmont Streetscape	\$500,000
Route 1A Planning Study	\$350,000
Copeland Circle/Route 1	\$1,250,000
Copeland Circle Planning	\$100,000
Route 60 Planning	\$150,000
Furlong Drive	TBD
Transportation Demand Management	TBD
Water Line Upgrade (2,800 LF)	\$5,600,000
Sewer Line Upgrade	\$6,400,000
Electrical Service	TBD
Electrical Lines at Winthrop Ave (1,800 LF)	\$4,500,000
Beachmont MBTA Station	TBD
<b>Boston Improvements</b>	
Route 1A Improvements - Boardman / Waldemar / Tomasello / Furlong (ptn in Revere)	\$25,000,000
Bennington Str. At Saratoga Str. (Boardman)	\$500,000
Boardman Str. At Saratoga Str.	\$500,000
Neptune Rd. - Chelsea to NB Route 1A off-ramp and Frankfort	\$2,500,000
Neptune Rd. - Bremen to NB Route 1A ramps and Frankfort	Included in item above
Route 1A at Curtis Str.	\$1,100,000
Bennington Str. "Beach to Beach" bicycle connection	\$140,000
<b>Totals</b>	<b>\$59,425,000</b>

Given the preliminary nature of the design of some of these infrastructure elements, MSM notes that, while they represent our team's best professional judgment, the estimates are preliminary. The actual costs of each element may vary from the estimate provided.

**5-02-10 EGRESS FROM GAMING ESTABLISHMENT SITE**

**Egress from Gaming Establishment Site**

The site is well served by a developed highway system. Route 1A (William F. McClellan Highway/Lee Burbank Highway) be the primary vehicle access and egress point accommodating approximately 80% of the Resort’s arrivals and departures. Improvements to Route 1A and to the

Furlong Drive access point to accommodate traffic safely and efficiently are being developed in coordination with MassDOT and the City of Revere.

Revere Beach Parkway will provide secondary access via an existing access driveway (Tomasello Drive) in Revere, with modifications to the driveway configuration, improvements to the pedestrian environment, and an update of the existing traffic control signals. Bennington Street, a north-south corridor, connecting the Route 1A corridor with Revere Beach Parkway, is immediately east of the MBTA Blue Line, which runs in a north-south direction east of the site.

The site is well served by public transportation. The Blue Line provides access from Boston's central subway system and Wonderland Station in Revere at Beachmont Station. Local MBTA bus services include Route 119 along Winthrop Avenue and Revere Beach Parkway with service between Revere and Winthrop via Beachmont Station.

A detailed answer is provided for each mode of transportation, including by auto/vehicle, public transit, walking and bicycling. Each answer is provided as an attachment.

This attachment describes existing transportation conditions in the study area including the regional and local roadway networks.

#### **[4-23 Egress from Gaming Establishment Site]**

##### **Attachment 4-23-02 – Roadway network**

#### **Roadway Network**

The location of the Project site in relation to the regional roadway network is shown in Figure A . The Project site is surrounded by Route 1A to the west, Route 145 (Winthrop Avenue) to the north, Bennington Street to the east, and the Boston City line to the south. The Project site is well located in relation to the Interstate and regional roadway systems. Specifically, the site is located on Route 1A approximately 1.5 miles north of the eastern terminus of I--90 (Massachusetts Turnpike) near Logan Airport, and therefore enjoys direct connections via the Ted Williams Tunnel to I--93 North and I--93 South (Southeast Expressway), as well as I--90 West continuing west through central Massachusetts. In addition, Route 1A connects to and from Downtown Boston and I--93 via the Sumner (to downtown Boston) and Callahan (from downtown Boston) Tunnels. There is a toll for vehicles travelling toward downtown Boston in both the Sumner and Ted Williams Tunnels.

From the north, Route 1 is an important regional corridor, but it relies on connections via Route 60 through Revere, and a tenuous connection with Route 16/Revere Beach Parkway, to access the Project site via Route 1A or Route 145 (Winthrop Avenue). Access from Route 1 southbound to Route 16 westbound and from Route 16 westbound to Route 1 northbound is not currently provided, resulting in connectivity issues. Additional sub--regional access from the north is provided by Route 1A through Swampscott and beyond, and via Route 60 to Route 107 to Salem.

Immediately to the west, Route 145 (Revere Beach Parkway) provides connections to Route 16, which in turn connects with I--93 in Medford, and, somewhat circuitously, to Routes 2 and 3 to the northwest.

**Roadway Descriptions**

The site is immediately served and/or bounded by a series of corridors two of which will serve as access corridors for the site, using existing (but improved) access points and existing and new median breaks. These adjacent roadways are illustrated in Figure B. The primary access, projected to be used by approximately 80% of the demand, will be via Route 1A. Access to the Project site is provided at Furlong Drive, while Tomasello Drive at Route 1A is available for existing users. Secondary access will be via Route 145 Winthrop Avenue at Tomasello Drive and North Shore Road.

...

**[4-23 Egress from Gaming Establishment Site]****Attachment 4-23-03 – Public Transit**

The Project site is well-served by public transportation, with several public transportation options within one-quarter mile of the site including bus routes and Blue Line rapid transit service provided by the Massachusetts Bay Transportation Authority (MBTA). These services are illustrated in Figure C, and their service and operational characteristics are described in further detail below.

...

**5-02-11 ADEQUACY OF EXISTING TRANSPORTATION INFRASTRUCTURE**

Current demands within the area's roadway infrastructure are at or near the capacity of the system, based on signalized intersection constraints, during peak operating periods. These include both the Route 1A corridor and Revere Beach Parkway, the two primary access routes to the Resort. Within the Route 1A corridor, the controlling intersections are Boardman Street and Mahoney Circle. At Boardman Street, the northbound Route 1A approach experiences considerable queuing and would be impacted with the addition of Resort-related traffic. The primary transportation improvement associated with the development is modifications in the area of Boardman Street through Furlong Drive, which is being developed in coordination with MassDOT and the City.

Improvements are also proposed on Winthrop Avenue. Other highway infrastructure improvements are proposed at the Route 1/Route 16 interchange, to provide a Route 1 southbound connection to Route 16 east and from Route 16 west to Route 1 north, pedestrian and roadway safety and capacity improvements in the Route 16 corridor and other improvements detailed in the Revere HCA. Transit-related infrastructure improvements are under consideration at Beachmont Station. Pedestrian and bicycle improvements are proposed throughout the area, including bicycle lanes along the Bennington Street and connecting corridors between Constitution Beach and Revere Beach.

A detailed answer is provided for each mode of transportation, including auto/vehicle, public transit, walking and bicycling. Each detailed answer is provided as an attachment.

This proposal/plan will be modified as the Project proceeds through the Site Plan Review process with the City of Revere, review with the Revere Conservation Commission and based on guidance and requirements provided by MassDOT, DCR and other stakeholders whose views and approvals may affect the applicant’s site design.

...

### **5-02-12 TRAFFIC MITIGATION**

#### **Traffic Mitigation**

The site enjoys the unique advantage of being directly adjacent to one of the MBTA’s primary rapid transit lines while at the same time being serviced by multiple bus routes. Mohegan Sun Massachusetts maximizes those attributes through a comprehensive transportation mitigation program that includes a focus on public transit, roadway improvements, a robust TDM program and alternative mode access. These programs have been vetted through the DEIR process and continue under discussion with regulatory agencies as the environmental review process continues.

Finally, a “Beach to Beach” bicycle connection is planned for Bennington Street in East Boston and Revere.

A detailed answer is provided for each category of improvements, including site access, transportation infrastructure, transit, TDM, pedestrian and bicycle accommodations. Each detailed answer is provided as an attachment.

- 4-25-02 Site Access Improvements
- 4-25-03 City of Revere Improvements
- 4-25-04 City of Boston Improvements
- 4-25-05 Transport Demand Management
- 4-25-06 Transit Improvements
- 4-25-07 Pedestrian Improvements
- 4-25-08 Bicycle Improvements
- 4-25-09 Figures referenced in 4-25 attachments

### **5-15-01 DESIGNATION OF SURROUNDING COMMUNITY WITHOUT EXECUTED AGREEMENT**

Mohegan Sun Massachusetts (MSM) designates the following as Surrounding Communities in accordance with 205 CMR 125.01(1)(a):

- Boston
- Chelsea
- Winthrop

Although no Surrounding Community Agreements have yet been formally executed, MSM is actively engaged with these municipalities and will make certain that impacts are properly mitigated and each community will fairly benefit from the economic benefits that will be generated by the resort.

In a matter of weeks, MSM has made great strides with the City of Chelsea. MSM and the City have agreed in principle on the terms of a Surrounding Community Agreement that is subject to City Council approval. MSM expects this agreement to be executed shortly. The Draft Surrounding Community Agreement (SCA) with the City of Chelsea is provided as Attachment 5-15-02. Briefly summarized, the SCA provides that:

MSM will fund, design and construct, in coordination with state and municipal agencies, substantial improvements to remedy traffic congestion at the Route 1/Route 16 Interchange. This Interchange is located in both the Cities of Revere and Chelsea, and therefore, is a critical infrastructure improvement project for not just Revere and Chelsea, but the entire region. The estimated cost to be incurred by MSM for these Route 1/Route 16 improvements is \$2.1 million, plus \$400,000 that MSM has committed for a planning study related to future projects as set forth further in Section 2.A.1 of the SCA.

The City will receive \$2.5 million in Community Impact Fee payments annually (and increased by the amount of the Consumer Price Index each year) from MSM for which the City may allocate to mitigate impacts and to general benefits for the City as provided further in Section 2.B.1 of the HCA.

During the construction phase of the Project, MSM will ensure that 5 percent of the total employee worker hours in trade will be by *bona fide* residents of the City; 25 percent of the total employee worker hours in trade will be by minorities, and at least 10 percent of the total employee worker hours in each trade will be by women as set forth in Section 2.G.1 of the SCA.

MSM will ensure that at least 5 percent of the total permanent workforce of the resort will be *bona fide* residents of the City as set forth further in Section 2.G.2 of the SCA.

MSM will purchase \$2.5 million annually in goods and services from vendors and companies with a principal place of business in the City, and ensure that businesses in the City have access to MSM's "Partnership Points Program" as set forth further in Section 2.H.1 of the SCA.

MSM will make a \$100,000 one-time payment to the City to establish a Jobs Readiness Program to prepare City residents for applying for potential jobs at the Resort as provided further in Section 2.B.2 of the HCA.

MSM will promote the City's hotels, restaurants, arts and entertainment and cultural institutions through joint marketing, provision of brochures or other efforts as set forth further in Section 2.C of the HCA.

MSM will provide the City with access to the resort's on-site problem gaming services as provided in Section 2.D of the SCA.

MSM will provide a mentoring program at Chelsea High School for City students that includes summer job opportunities as provided in Section 2.K of the SCA.

In addition to Chelsea, MSM and Sterling Suffolk Racecourse (Suffolk Downs) representatives have been in discussions with Boston and Winthrop. The issues presented by Boston and Winthrop, given the locations of those communities and their proximity to the resort, call for individual Surrounding Community Agreements with each.

While no agreements have been reached, MSM through its partner Suffolk Downs has reached out to each community, as shown in letters to each municipality that are provided in Attachments 5-15-03 and 5-15-04. In the spirit of cooperation and outreach to these new community partners, MSM affirms its support for Suffolk Downs' past efforts to reimburse the City of Winthrop for consultant and other expenses associated with analyzing the potential impacts of expanded gaming on the Suffolk Downs property (See Attachments 5-15-05 and 5-15-06.)

### **5-33 TRAFFIC CONTROL MEASURES**

Mohegan Sun has extensive experience implementing traffic control measures at its other facilities. The primary means of controlling traffic to and from the site is through the resort's extensive mitigation program, including improvements to infrastructure, a robust Transportation Demand Management (TDM) program, the adoption of a comprehensive ground shuttle program, and through affirmative steps to be taken to maximize the fact that the project site is uniquely located adjacent to a major MBTA transit line. During construction, limits will be instituted on any work that will impact traffic flow, particularly during peak hours. After construction, Mohegan Sun Massachusetts (MSM) will work with the City of Revere, MassDOT and the Department of Conservation and Recreation to minimize impacts, to schedule planned construction, and to coordinate special event impacts with other events in the region. MSM's TDM program, as detailed in this Application, will implement proven measures to limit roadway trips to the site and encourage the use of public transportation

### **5-33-01 TRAFFIC CONTROL MEASURES**

Mohegan Sun has extensive experience implementing traffic control measures at its other facilities. The primary means of controlling traffic to and from the site is through the resort's extensive mitigation program, including improvements to infrastructure, a robust Transportation Demand Management (TDM) program, the adoption of a comprehensive ground shuttle program, and through affirmative steps to be taken to maximize the fact that the project site is uniquely located adjacent to a major MBTA transit line.

During construction, limits will be instituted on any work that will impact traffic flow, particularly during peak hours. After construction, Mohegan Sun Massachusetts (MSM) will work with the City of Revere, MassDOT and the Department of Conservation and Recreation to minimize impacts, to schedule planned construction, and to coordinate special event impacts with other events in the region. MSM's TDM program, as detailed in this application, will implement proven measures to limit roadway trips to the site and encourage the use of public transportation.

To control demand, the resort will take advantage of its unique location directly next to a MBTA transit station and along bus routes. The project site is well served by public transportation, with several available options including the Blue Line rapid-transit Beachmont Station abutting the site, and bus routes within one-quarter mile of the site, all provided by the MBTA. To further encourage use of public transit, MSM intends to collaborate with the MBTA to upgrade and expand Beachmont Station. In addition, stronger pedestrian and bicycle connections will be made onsite to promote use of the station. Attachment 5-33-05 provides maps that depict existing and proposed MBTA and bicycle access to the resort.

A range of incentives to encourage public transit as an access mode, particularly for employees, will also be included in the Transportation Demand Management plan for the project, the primary objective of which is to reduce single occupancy vehicle (SOV) travel, thereby reducing parking demand, congestion, and associated environmental impacts from the project. Complementary to the reduction in vehicular impacts, the TDM plan also enhances mobility by alternative modes of travel by promoting walking, bicycling, ridesharing, and transit. The TDM plan is an integral component of the overall project mitigation package, and it overlaps with other key plan elements such as parking demand management and infrastructure improvements.

While goals for TDM programs targeted at employees and patrons are the same (e.g., to reduce drive-alone travel, reduce travel during commuter peak hours, and reduce reliance on personal automobile), the actual execution and implementation of these programs varies because of differences in travel behavior and characteristics of employees and patrons. As such, TDM



programs need to be tailored to each group and account for unique needs. MSM proposes to develop and implement TDM actions and strategies appropriate for each user group.

In addition, MSM will prepare the TDM plan in close coordination with other stakeholders such as Massport, the MBTA, the City of Revere, and surrounding communities. The plan will be comprehensive and include policy/management, infrastructure, and programmatic components.

### **5-33-06 EXPECTED VEHICLE TRAFFIC**

The traffic analysis that is presented in Attachment 4-24-02 (Roadway Network) is based on the 6,000 gaming position resort that was previously proposed and presented in the DEIR. The resort project-generated daily vehicle trips were projected to be 24,188 Average Daily Trips (ADT), total both inbound and outbound. R

It should be noted that the projected project-generated trips in the local study area are over-estimated, as they include both patron and employee vehicle trips. . During operation, project-generated trips will be less than shown because parking for employees, other than essential staff/senior management, will not be provided on-site, and those employee vehicle trips will be intercepted at remote parking locations and brought to the site by the Resort's comprehensive shuttle system. Therefore, the trip generation and analysis presented in Attachment 4-24-02 reflect a conservative (worst case) assessment of traffic impacts in light of both the inclusion of all employee trips as being generated at the Resort site itself, and the reduced Resort program included in the Gaming License Application since the previous DEIR analysis.

It is also the case that several of the planned improvements, such as the improvements planned at Route 1 and Route 16, while assisting in mitigating traffic impacts, are principally designed to address long-standing traffic issues of regional concern, not resort-generated vehicle trips. MSM also has also taken steps to study and offer suggestions on ways to mitigate existing traffic concerns less proximate to the resort at the request of MassDOT. An example of this assistance is the review of Ted Williams Tunnel traffic in South Boston, and suggestions offered to assist in tunnel mainline operations that were included with our Application.

It should be clarified, however, that MSM did not propose in the application, and is not proposing in this supplement, these suggestions as either necessary for resort traffic or as proposals for the project, and, more particularly, has not proposed to close or dedicate an I-90 lane for traffic mitigation.

#### *Definition of Surrounding Area*

The study area surrounding the Resort project site is presented in Attachment 5-33-07, extending to the following locations:

- North on Route 1A to its intersection with Revere Street, approximately 1.4 miles geographically from the site
- Northwest on Route 60 to its intersection at Route 1 (Copeland Circle), approximately 2.5 miles geographically from the site
- West on Route 16/Revere Beach Parkway to its intersections with Route 1 and Webster Avenue, approximately 1.7 miles geographically from the site
- South on Route 1A and Bennington Street to their intersections at Neptune Road, approximately 1.9 miles geographically from the site, and south on I-90 to the South Boston side of Boston Harbor, approximately 4.7 miles geographically from the site
- East along the Bennington Street corridor, north to Route 145 at Elliot Circle, approximately 0.4 miles geographically from the site, and south to Saratoga Street, approximately 1.1 miles geographically from the site.

### **5-34 TRAFFIC FOR SPECIAL EVENTS**

Mohegan Sun Massachusetts (MSM) will pay particular attention to special events at the resort that may generate significant additional volumes of traffic. A host of measures will be implemented to assist with traffic control and operations devices to guide motorists clearly and safely to the resort during these events and to ease impacts on nearby residents and businesses. Measures to be deployed include, first and foremost, effective scheduling of events so as to avoid to the maximum extent possible conflicts with other planned events in the region that might generate significant traffic volumes.

#### **5-34-01 TRAFFIC FOR SPECIAL EVENTS**

A host of measures will be implemented to assist with traffic control and operations devices to guide motorists clearly and safely to the resort during these events and to ease impacts on nearby residents and business. Measures to be deployed include, first and foremost, effective scheduling of events so as to avoid to the maximum extent possible conflicts with other planned events in the region that might generate significant traffic volumes.

Specific traffic control and operations strategies include the use of physical barriers and channelizing devices, additional traffic control personnel both onsite and at critical offsite intersections, public notice through public information efforts, advertising of alternate routes, increased use of public transportation and the resort’s ground shuttle operation and other efforts.

The MSM Transportation Supervisor (who is on site 24/7) will coordinate closely with City of Revere, City of Boston, MassDOT, DCR, Massport and other stakeholders to ensure this does not adversely impact the surrounding area. In many cases special events will be scheduled outside of peak traffic times.

### **5-36-01 HOUSING**

#### *Housing*

While Mohegan Sun Massachusetts (MSM) will create increased employment, small business revenues and family incomes in Revere and throughout the region, the Greater Boston housing market is so large and diverse that the impact of the resort on the demand for housing will in all likelihood be negligible. F

Attachment 5-36-03 provides an empirical study of this issue. It has also been demonstrated that, nationwide, casino development has had a significantly positive impact on retail property values. As a representative example, a case study from Detroit is provided as Attachment 5-36-04. We are not aware of any research that provides evidence of a decline in housing values or home prices at the neighborhood, city or county level due to the presence of a gaming resort. As such, the resort’s impact on housing stock is expected to be minimal yet positive.

### **5-36-03 PROPERTY VALUE STUDY**

#### Introduction

There has been a significant amount of debate in the local and national press as to the impact of a casino on property values in the immediate vicinity of a casino, and the topic has been part of the public discourse over a potential new casino at Suffolk Downs.

6. Revitalization of communities and specific areas within communities that have needed cleaning up, capital investment, or an entertainment anchor, etc., which then functions as a catalyst to create a spillover effect on adjacent properties that then experience increased property values.

On the other side of the coin, those who suggest casinos cause a decline in property values point to concerns over crime<sup>1</sup> and traffic as the controlling factor. It should be pointed though that there is no evidence for increased crime and traffic issues are generally mitigated through infrastructure investment by the casino itself or by the local municipality often subsidized by funds from the casino. The following presents both anecdotal and quantitative information on the impact on property values in the immediate vicinity of a casino.

Evidence Supporting Property Value Increases

The most comprehensive study on residential property value impacts related to casino development can be found in “ To make the analysis more relevant to the debate over casino legalization in Massachusetts, the authors added a number of counties with greater populations and counties which were home to larger casinos to serve as analogs to what the more populous communities in Massachusetts might experience.

The Rappaport study indicates that casinos are associated with population, employment and house price increases and unemployment declines. The exception is for the most populous casino counties where these beneficial impacts are more muted and where unemployment actually increased. The latter is more likely due to macroeconomic issues in these counties rather than the presence or lack thereof of a casino. The following table is reproduced from the Rappaport analysis.

**All casinocounties**

**Large -capacity  
casino counties**

**Populous casino  
counties**

**Average effect**

<b>Population growth (%)</b>	5	8.6	8.1	7.2
<b>Total employment (%)</b>	6.7	14.9	5.7	9.1
<b>Unemployment (%)</b>	-0.3	-1.2	0.5	-0.3
<b>House prices (increase)</b>	\$5,869	\$8,924	\$7,083	\$7,292

This analysis suggests that there is a positive impact on house prices and therefore property values.

A recent dissertation found similar effects. In “The Impact of Casino Gambling on Housing Markets: A Hedonic Approach”<sup>3</sup> (2007), Mike Wenz states that “Using data from the 1990 and 2000 U.S. Census of Population and Housing, the estimated net benefit of casino gambling at year 2000 levels was approximately 2% of household value, or about \$2,000-\$3,000 per household for households living near a casino. Additionally, there are positive spillover effects to

neighboring in-state regions and no significant costs to out-of-state border regions.” The dissertation also found that benefit declines as population increases.

So while both these analyses see a benefit in terms of increasing housing property values, they differ in the degree, and both see less benefit with increasing population in the surrounding area.

Research on the impact on the value of commercial real estate is scant, and the one study available in the academic literature concludes that casinos have a positive impact. A study on the effects of casinos in downtown Detroit found a significantly positive influence on retail property values from casino development.<sup>4</sup> The effect was shown to be stronger within a 5-mile radius of the casinos, suggesting that casinos have a complementary, rather than substitution, effect on other businesses.

In addition to the quantitative evidence there is also some qualitative and anecdotal evidence to support increasing commercial property values as a result of casinos development.

As part of its evaluation of the Argosy Riverboat in Lawrenceburg, Indiana the Indiana Gaming Commission<sup>5</sup> and its consultants conducted a focus groups with community leaders including representatives of law enforcement, local business leaders (retail, restaurant, hotel, convention) from both Rising Sun and Lawrenceburg, and Social services providers (from or serving Rising Sun and/or Lawrenceburg). All three groups stated emphatically that the presence of the riverboat had increased commercial property values. In the summary the evaluation stated “Property tax reassessment increased assessed values and reduced tax rates”.

In addition, Browne, M.N. and N.K. Kubasek, in an article entitled “Should We Encourage Expansion of the Casino Gambling Industry?”<sup>6</sup>, concluded that:

“Virtually every community that has welcomed casinos has witnessed a sharp increase, occasionally almost instantaneously, in property values.”

**Case Studies** To determine if gaming had an effect on property values, we compared median housing values in a number of communities from 1990 and 2000 census data<sup>7</sup>. These locations were selected for two primary reasons, first they were in operation prior to 2000 but not in 1990. This allowed the effect on housing values to be assessed by comparing data from the 1990 and 2000 census (using data for the 2010 census was not considered as appropriate given the housing crash that occurred in 2007-2008 and from which housing values have not yet recovered) and secondly for the availability of local housing value data. To determine what effect gaming had on property values, we compared the change in property values surrounding the casino to those of a control group. The control group was a similarly situated locality that did not have any gaming facilities operating during the time period. By examining the different growth rates for the gaming and non-gaming locations, we can begin to understand if the introduction of gaming has an effect on surrounding property values.

Wheeling, West Virginia Wheeling Island is a greyhound racetrack that, at the time of this case study, featured 2,400 slot machines, 6 restaurants and a 151-room hotel. It is located in Wheeling, West Virginia. The control community chosen was Morgantown, WV, located to the southeast.

Housing value growth in this case study did not appear as stratified as in the other locations. Here the city and county which was host to a casino saw an increase in median housing values in the time period by 43% and 46%, respectively. The control city and county increased housing values by 37% and 48%, respectively. The two do not appear to be markedly different.

The census tract hosting the racetrack saw an increase in housing values of 44%. Again, the increase was not particularly different from the other locations. In this instance, it would appear that the racetrack had little to no impact on housing values in the immediate area.

### **Wheeling Island Median Housing Values**

#### **1990 2000 Percent Change**

**Census Tract** \$28,800 \$41,400 44%

**Wheeling** \$47,000 \$67,100 43%

**Ohio County** \$48,800 \$71,400 46%

**Morgantown** \$69,500 \$95,000 37%

**Monongalia County** \$64,600 \$95,500 48%

**West Virginia** \$47,900 \$72,800 52%

**United States** \$79,100 \$119,600 51%

Source: U.S. Census.

### **Black Bart Casino**

The second location is Willits, CA, which is home to Black Bart Casino. The facility opened in 1996 and features over 200 slot machines. The control group is Ukiah, CA, which is located in the same county as Willits but does not have a gaming venue. Housing values in Willits saw a 56% increase as compared to Ukiah, which only saw an increase of 30% between 1990 and 2000. Willits saw increases well above the county's increase of 37%

### **Black Bart Casino Median Housing Values**

#### **1990 2000 Percent Change**

**Census Tract** \$105,400 \$136,500 30%

**Willits** \$82,600 \$129,000 56%

**Ukiah** \$113,300 \$146,900 30%

**Mendocino County** \$123,900 \$170,200 37%

**California** \$195,500 \$211,500 8%

**United States** \$79,100 \$119,600 51%

Source: U.S. Census.

Isle of Capri Casino

Located in Bettendorf, Iowa, the Isle of Capri casino is in a residential area. The casino opened in 1995 and offered 1,000 slot machines, blackjack, roulette, Let It Ride and Caribbean Stud Poker. The control group chosen is Burlington, IA, a similarly sized city located 95 miles southwest of Bettendorf.

Median housing values in Iowa increased significantly during the study period. While the U.S. increased by just over 50%, Iowa saw a gain of 80%. Neither of our study areas saw gains quite as high as the state’s average.

The Downs at Albuquerque

The Downs at Albuquerque is an operating racetrack that introduced gaming in 1999. The facility offers slot machines and video poker. The control location is Las Cruces, NM, which is located about 200 miles south of Albuquerque. The city does not have a gaming facility.

During the study period, housing values in New Mexico rose 54% which was slightly higher than the national average of 51%. The area directly surrounding The Downs at Albuquerque saw a 47% gain in housing values compared to the city’s increase of 49%.

The county in which The Downs is located saw an increase of 50%. For the control groups, city and county median housing values increased by only 34% and 35%, respectively.

These figures indicate that as compared to a location without gaming, such as Las Cruces, property values increased more rapidly in the city and county with gaming facilities available. For the census tract that hosted the casino, property values did not rise as much as those in the city and county generally. However, the difference is extremely slight, and property values in the neighborhood with the racetrack were already significantly much lower than the city or county average before gaming was introduced.

**The Downs at Albuquerque Median Housing Values**

**1990 2000 Percent Change**

<b>Census Tract</b>	\$64,000	\$94,150	47%
<b>Albuquerque</b>	\$85,900	\$127,600	49%
<b>Bernalillo County</b>	\$85,300	\$128,300	50%
<b>Las Cruces</b>	\$68,300	\$91,200	34%
<b>Dona Ana County</b>	\$67,300	\$90,900	35%
<b>New Mexico</b>	\$70,100	\$108,100	54%
<b>United States</b>	\$79,100	\$119,600	51%

Source: U.S. Census.

Note: The census tract containing the Downs at Albuquerque from 1990 was split into two census tracts for the 2000 census. The 2000 census tracts have median house values of \$94,500 and \$93,800. The average of the two new census tracts' housing values was used in these computations.

### School Expenditures and Property Values

According to Massachusetts' legislation, the local Education Fund is to receive 14% of the tax revenues while the Gaming Local Aid Fund is to receive 25%. It can be assumed that a portion of the 25% will be distributed to various community education systems.

These additional funds will benefit the school systems, which in turn will increase the value of the community's housing market. This result, assuming that the school funding generated by casino gaming is accretive to overall school funding, in a self-reinforcing system as the byproduct of increased property values is improved funding for schools as they are largely funded by property tax assessments. The following provides some evidence for this effect.

In "Using Market Valuation to Assess Public School Spending", a working paper available on The National Bureau of Economic Research's website, the authors concluded that for every \$1.00 increase in per pupil aid aggregate housing values increased by \$20.00. The authors further conclude that even though some of the increase in value reflects lower tax burdens, most of the increase reflects per pupil district expenditures.

Other sources cite that school quality/expenditures are correlated to higher property values.

From the "Federal Reserve Bank of St. Louis Review, May/June 2010" in an article titled "*Nonlinear Effects of School Quality on House Prices*":

"Unlike most studies in the literature, we find that the price premium parents must pay to buy a house in an area associated with a better school increases as school quality increases. This is true even after controlling for neighborhood characteristics, such as the racial composition of neighborhoods. In contrast to previous studies that use the boundary discontinuity approach, we find that the price premium from school quality remains substantially large, particularly for neighborhoods associated with high-quality schools." From a paper entitled *Public School Funding and Performance*, written by John Mackenzie, at the University of Delaware:<sup>8</sup> "School system quality, indexed by NAEP performance, is correlated with higher property values generally; therefore all residents in a community benefit from strong schools. The direct positive correlation between school taxes and property values is also proved. This positive correlation between local tax per housing unit and property values suggests that most of America is underinvesting in public education."



From a paper entitled *Housing Prices and the Quality of Public Schools: What Are We Buying?*, written by Theodore M. Crone in a Business Review for the Federal Reserve Bank of Philadelphia, September/October, 1998:

“Even though the overall relationship between school resources and student achievement is a matter of controversy, most researchers agree that when extra resources are used wisely, they can enhance the quality of education and thereby contribute to higher house prices. These extra resources might be used to improve academic achievement, but they might also be used to improve other dimensions of school quality, such as the physical attractiveness of the school or the range of extracurricular activities.”

### Summary of Case Studies

In none of the case studies we looked at, either in the neighborhood, the city or the host county, did we find any evidence that property values declined due to the presence of a casino

In the case of Wheeling and Albuquerque, there are no appreciable differences between median housing values in the census tract and the city or county averages. In no case did property values decline.

In two of the four cases (Willits and Bettendorf), property values near the casino did not rise as much as they did in the larger community. However, their growth rates were comparable to their respective control groups. Moreover, in the case of Bettendorf, the facility census tract experienced 61% growth in median house values and in Willits 30%.

One factor that has to be kept in mind is that the areas around the facilities are established neighborhoods, whereas new suburban housing development would drive city-wide or county-wide averages up higher than would be expected in established neighborhoods. It is likely that the degree of positive impact of a casino on property values is primarily related to the specifics of each case and any effect is, in all likelihood, dwarfed by broader economic factors affecting housing values nationally, regionally and at the neighborhood level. As previously discussed, some of the positive effects may be attributed to casinos' funding of school improvement programs.

The impact on housing is much more significant in smaller communities where the housing stock prior to the advent of a casino would be much smaller and where the proportion of single family homes is much greater than in major metropolitan area such as Boston. For example, many of the small communities in and around Foxwoods and Mohegan Sun in Connecticut saw housing shortages as casino employees looked for proximate housing. These communities also experienced illegal and indeed dangerous subdivision of single family homes into apartments and even boarding houses.

## Conclusion

The preponderance of evidence suggests that commercial property values increase after the introduction of casino gaming, especially in the vicinity of the casino. This can be attributed to the large influx of visitors to a specific area which provides greater commercial opportunities than would otherwise be available. The evidence for a positive impact on residential property values is less conclusive but in no case did we find evidence that property values in the vicinity of a casino, in a city or county hosting a casino declined.

## **G. OTHER**

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## 3. DEVELOPMENT

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### Legal Framework

In determining whether a community is a surrounding community, the commission . . . will evaluate whether: . . . The community will be significantly and adversely affected by the development of the gaming establishment prior to its opening taking into account such factors as noise and environmental impacts generated during its construction; increased construction vehicle trips on roadways within the community and intersecting the community; and projected increased traffic during the period of construction. 205 CMR 125.01(2)(b)(3)

### Executive Summary

#### Community Petition

In addition, Everett has a long-standing problem with code and zoning enforcement regarding industrial properties used as junkyards, sand and gravel operations, scrap metal stockpiling, building materials recycling and related uses. Accordingly, though the complete lack of communication or project details from the applicants makes it difficult to predict with assurance, it is very likely that Everett will experience a significant amount of heavy truck traffic and code enforcement issues during construction of the Mohegan project.

Not specifically addressed.

#### Applicant Response

The City cannot demonstrate that it will be significantly and adversely affected by the development and construction of the gaming establishment.

Construction of the Project will take approximately 30 months to complete. MSM has pledged that it will establish and implement Construction Management Plans to address construction sequencing, staging plans, material deliveries, and mitigation measures designed to minimize impacts from the construction of the Project. All construction staging will be provided on the resort property. Further, the construction workforce will arrive prior to peak traffic periods ensuring that construction period trips are not expected to impact traffic conditions. Moreover, construction vehicles will not travel on Everett roads, but rather will use the interstate highway system south of the resort casino to access the project site.

#### RPA Analysis

While the DEIR/EPNF includes a draft Construction Management Plan that addresses truck issues during the construction period, the FEIR should provide information pertaining to trucks once the project is operational. Specifically, the FEIR should include information regarding the estimated number, size, and frequency of trucks accessing the Project site. In

particular, information regarding how will trucks will access the Project site and where they will originate should be provided (e.g., Will trucks be required to access designated roadways? What routes will they take? What is the schedule of regular truck visits? and What steps can be taken to minimize noise disruption to surrounding neighborhoods?).

### DEIR Analysis

Construction Period Impacts. The FEIR should include an updated CMP to reflect any proposed modifications to the Preferred Alternative or off-site transportation improvements. The FEIR should identify conceptual locations for construction staging for the off-site transportation improvements to confirm constructability without additional impact to wetland resource areas or other environmental constraints. The FEIR should discuss the anticipated construction-period truck traffic trips expected during the peak construction period and projected regional and local truck traffic routes to the project site. The DEIR included a construction phasing graphic that identified the proposed location of parking for ongoing track operation and the first phase of casino operations. The FEIR should discuss the estimated parking demand during each of these construction phases and tabulate available on-site parking to confirm that adequate parking will be provided for construction workers and ongoing track and casino operations.

### Consultant Analysis

Based on the anticipated 15-20 trucks per day which have access to and from the site via several major highways, we do not expect that Route 16 in Everett will be significantly affected under this impact factor.

## **A. COMMUNITY PETITION**

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In addition, Everett has a long-standing problem with code and zoning enforcement regarding industrial properties used as junkyards, sand and gravel operations, scrap metal stockpiling, building materials recycling and related uses. Accordingly, though the complete lack of communication or project details from the applicants makes it difficult to predict with assurance, it is very likely that Everett will experience a significant amount of heavy truck traffic and code enforcement issues during construction of the Mohegan project.

## **B. APPLICANT RESPONSE**

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The City cannot demonstrate that it will be significantly and adversely affected by the development and construction of the gaming establishment.

Construction of the Project will take approximately 30 months to complete. MSM has pledged that it will establish and implement Construction Management Plans to address construction sequencing, staging plans, material deliveries, and mitigation measures designed to minimize impacts from the construction of the Project. All construction staging will be provided on the resort property. Further, the construction workforce will arrive prior to peak traffic periods ensuring that construction period trips are not expected to impact traffic conditions. Moreover, construction vehicles will not travel on Everett roads, but rather will use the interstate highway system south of the resort casino to access the project site.

As set forth in MSM's RFA-2, at minimum, these Construction Management Plans will include:

- Detailed measures to ensure the maintenance of existing levels of service on adjacent roadways during project construction and to minimize disruption in the area.
- A construction activity schedule, construction staging areas, perimeter protection and public safety, material handling, construction trip generation and worker parking, defined truck routes and volumes, the need for full or partial street closures, delivery schedules, pedestrian and vehicle access, TDM measures for construction workers, construction-period air quality and dust control, construction-period noise, additional construction-period mitigation measures (e.g., rodent control), and coordination with other construction projects in the area.
- The required use of appropriate construction techniques to ensure public safety and protect nearby residences and businesses, including as necessary, barricades, walkways, painted lines, and signage.
- Construction management and scheduling that will minimize impacts on the surrounding environment by comprehensively planning for construction worker commuting and parking, establishing routing plans and scheduling for trucking and deliveries, protecting existing utilities, maintaining fire access, and controlling noise and dust.

Further, MSM is bound in its Host Community Agreement to enter into a construction mitigation agreement with the City of Revere. HCA, § 2.H.4(b). In conjunction with this agreement, future Construction Management Plans will be comprehensive and effectively mitigate and eliminate nearly all construction-related impacts that the City might experience during development of the Resort. A conceptual model for a future Construction Management Plan that was submitted with the DEIR is attached to this Memorandum as Exhibit 3. In sum, the City cannot demonstrate that during development, noise or environmental conditions, if any, will have a significant and adverse impact on the City. *Id.*

### **JANUARY 29, 2014 – MOHEGAN SUN COMMENTS ON DEVELOPMENT**

23 MR. BAKER: Development didn't really come up in  
24 the presentation, but I just want to address it  
1 because it's in the petition. There are issues  
2 of construction mitigation. And I would simply  
3 point out that this proponent has entered into  
4 a legally binding commitment that it will enter

5 into a construction management plan with the  
6 city of Revere. That plan has been filed and  
7 is an attachment to the DEIR and will be  
8 further upgraded noted in the notice of project  
9 change that will be filed on January 31, and  
10 will be fully laid out in the final DEIR that

11 the project goes through.  
12 I can just tell you that all of  
13 those relevant agencies care deeply. DCR cars  
14 a whole lot about traffic impact on Route 16 as  
15 an example. They've had extensive discussions  
16 with us about truck traffic.  
17 So, I think there is another forum

18 where those matters are being dealt with. I  
19 would also note that there is no required  
20 construction management plan in the Everett HCA  
21 as opposed to the Revere HCA. So, the sudden  
22 concern of this applicant on this issue is of  
23 interest to me.



## **C. RPA ANALYSIS**

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### **MAPC DEIR ANALYSIS**

#### **Trucks**

While the DEIR/EPNF includes a draft Construction Management Plan that addresses truck issues during the construction period, the FEIR should provide information pertaining to trucks once the project is operational. Specifically, the FEIR should include information regarding the estimated number, size, and frequency of trucks accessing the Project site. In particular, information regarding how will trucks will access the Project site and where they will originate should be provided (e.g., Will trucks be required to access designated roadways? What routes will they take? What is the schedule of regular truck visits? and What steps can be taken to minimize noise disruption to surrounding neighborhoods?).

## **D. DEIR ANALYSIS**

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### **SUFFOLK DOWNS EOEEA DEIR CERTIFICATE**

October 18, 2013

Construction Period Impacts. The FEIR should include an updated CMP to reflect any proposed modifications to the Preferred Alternative or off-site transportation improvements. The FEIR should identify conceptual locations for construction staging for the off-site transportation improvements to confirm constructability without additional impact to wetland resource areas or other environmental constraints. The FEIR should discuss the anticipated construction-period truck traffic trips expected during the peak construction period and projected regional and local truck traffic routes to the project site. The DEIR included a construction phasing graphic that identified the proposed location of parking for ongoing track operation and the first phase of casino operations. The FEIR should discuss the estimated parking demand during each of these construction phases and tabulate available on-site parking to confirm that adequate parking will be provided for construction workers and ongoing track and casino operations.

## **E. CONSULTANT ANALYSIS**

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Dewberry Engineers, Inc.

## **F. APPLICATION**

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### **2-10. TIMELINE FOR CONSTRUCTION**

On-site construction includes demolition of existing structures, excavation, foundations (including deep foundation systems) for parking, podium (gaming, retail and entertainment areas) and hotels, core and shell construction and all exterior and interior construction for the Boutique and MSM Hotels, casino and gaming areas, entertainment, retail, conference and related areas. On-site construction includes completion of all onsite roadways, surface parking, infrastructure, landscaping and associated site finishes. This portion of the project will be completed 30 months from the issuance of the building permit. Gaming operations will begin 30 months after the actual start of construction. Off-site construction involves Route 1A infrastructure improvements and other off-site improvements in Revere and elsewhere, plus expected work in and around Beachmont Station and certain utility improvements, as described in detail in the Revere Host Community Agreement (HCA). While some work will be completed after the destination resort is opened, most will begin in Month 5 and will be completed by Month 29. Based on the current scope of work, a total of 3,800,000 construction person hours are estimated for the project.

### **2-28 TOTAL INVESTMENT OUTSIDE THE PROPERTY**

Mohegan Sun Massachusetts (MSM) will invest significantly in the infrastructure outside the property lines of the Project. All improvements are detailed in the Revere Host Community Agreement and in the Draft Environmental Impact Report filed for the Project. The investment by MSM in offsite infrastructure improvements will be in excess of \$45,000,000 and includes the following components: (1) offsite traffic and safety improvements; (2) alternate mode transportation improvements; and (3) utility infrastructure improvements. Traffic congestion and safety improvements will be made to the intersections of Route 1/Route 16, Route 16/Route 145/Harris Street, Donnelly Square, North Shore Road/Revere Beach Parkway/Tomasello Drive, Mahoney (Bell) Circle, Brown Circle, Route 60/Revere Street, Copeland Circle/Route 1 and Winthrop Avenue, Route 1A (Boardman Street to Furlong Drive), Bennington Street/Saratoga Street, Boardman Street/Saratoga Street, Neptune Road/Chelsea Street, and Curtis Avenue/Route 1A. Alternate mode transportation improvements will include expected improvements to the Beachmont MBTA Station, the MBTA bus drop-off on the eastbound side of Winthrop Avenue and bicycle improvements that will connect Constitution Beach with Revere Beach. Utility infrastructure improvements will be made to the water and sewer distribution systems to the MSM site. All infrastructure investments are subject to the approval of the owner of the asset.

### **2-30 CONSTRUCTION PLAN**

This plan will cover both onsite activities and offsite improvements. We will maintain an open dialogue with the community to address concerns at all times throughout the construction

process. Construction will be complete 30 months from the issuance of the building permit from the City of Revere. The work includes construction of a new destination resort casino complex with related site amenities including offsite improvements. On-site construction includes a parking structure, a gaming/retail podium with meeting rooms and entertainment venues, two hotels, roadways, landscaping and general site improvements. The scope of work for the offsite improvements will include numerous roadway and infrastructure projects, detailed in the Revere Host Community Agreement (HCA). This proposal/plan will be modified as the Project proceeds through the Site Plan Review process with the City, review with the Revere Conservation Commission and based on guidance and requirements provided by MassDOT, DCR and other stakeholders whose views and approvals may affect the applicant's site design

#### **4-54 SUSTAINABLE BUILDING CONSTRUCTION**

Specifying sustainable building materials is one of the many strategies that will help Mohegan Sun Massachusetts achieve LEED Gold Certification. Recycled, regionally sourced, salvaged and sustainably harvested materials will be selected and specified for the project at an early stage. Integrating these materials into the project and site design will reduce the impacts associated with transporting materials and extracting/processing virgin materials.

Additionally, the indoor environmental quality associated with construction materials will be major focus for the project. Specifying low-emitting products and carefully tracking them during the submittal process will help ensure a high-level of indoor air quality is achieved and maintained post-occupancy. Indoor Air Quality Management programs will be implemented during construction and post-occupancy to provide comfort and wellbeing of construction workers and building occupants.

#### **5-06-07 CONSTRUCTION MITIGATION**

This draft Construction Management Plan (CMP) addresses construction sequencing, staging plans, material deliveries, and specific mitigation measures intended to avoid and minimize impacts from the Project. As Project design progresses, protection measures will be added and modified as appropriate. A CMP will be submitted to the Boston Transportation Department for approval prior to commencement of construction, and the Developer's general contractor will be bound by the operational parameters described herein.

For on-site construction, the Developer and construction team will coordinate CMPs with the cities of Boston and Revere and applicable state agencies and authorities, as appropriate.

### **1. Construction Methodology**

This section describes the construction schedule and the methods that will be used for staging, site access, public safety, and erosion and sediment control.

### ***1.1 Construction Activity Schedule***

Project construction is expected to take up to 60 months. Weekend, extended hours and 2<sup>nd</sup>/3<sup>rd</sup> shift activities will require an off-hours permit jointly issued by the Inspectional Services Department and Boston Transportation Department (BTD), and will be performed in a manner that will minimize impacts as may be necessary to meet permitting restrictions. The general contractor will also need to perform some activities, such as materials unloading, during off hours; deliveries of large construction equipment (e.g., cranes, excavation equipment) will be scheduled to avoid and/or minimize impacts to vehicular, pedestrian traffic and noise generated from the site.

Within the site, activities such as excavation, pile driving, and steel erection will also be prohibited during these hours. Every two weeks, the contractor will publish an updated schedule of upcoming work and will disseminate the schedule to affected parties in local neighborhoods. In addition, the general contractor will publish monthly schedule updates describing progress as well as projected activity for the next month. This information will be available on a Project website which will allow neighbors real-time access to the most up-to-date construction information.

### ***1.2 Construction Staging and Truck Deliveries***

The proposed staging plan is designed to isolate construction activities while providing safe access for pedestrians and automobiles during normal daily activities as well as emergencies. All adjacent streets will remain open to the public during construction.

Construction storage and staging will remain within the fenced construction fence enclosure. This boundary will be enclosed with a six-foot-high chain link fence with privacy screening. Plans illustrating construction phasing and staging on the Project site will be provided to and subject to review and approval by BTD prior to the commencement of any Work on the Property.

All construction delivery trucks will enter the site from Route 1A at Tomasello Drive, and will not be allowed to park or idle on neighborhood streets. Major deliveries such as steel or large pieces of mechanical equipment will be staged on-site. Specific language regarding staging locations and the prohibition of staging materials in neighborhood streets will be called out in all subcontracts. While it is not anticipated that any off-site staging or marshalling areas will be used, the locations of any and all staging and marshalling areas will be forwarded to the BTD and the City of Revere for review and approval. Truck wheel wash stations will be located and used at all site exits to ensure that soil materials are not tracked onto roadways from the site. During all site work activities, construction laborers will maintain adjacent streets and sidewalks to prevent accumulation of dirt and dust. Mechanical sweeping, and at the City's sole discretion,

vacuum sweeping, will be used continuously during the excavation, foundation, and site work phases of the project to maintain adjacent roadways.

...

## **2. Construction Air Quality**

Construction operations at the site, including earthwork, will generate dust. All demolition and construction work will be performed in accordance with applicable sections of the MassDEP Air Pollution Control Regulations at 310 CMR 7.02 and 310 CMR 7.09. Specific air quality mitigation measures will be as follows:

...

## **5. Construction Traffic Impacts**

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Unless a specific exception is approved by BTM and the City of Revere, the Developer shall require all construction vehicles to access the Project site from Route 1A at Tomasello Drive. Wheel wash stations and anti-tracking stone pads, which will be at least 50 feet long and consist of a four-inch-thick layer of crushed stone placed over a non-woven filter fabric, will be placed at each access point to the work area. Wheel wash stations will remain in place until the completion of construction and anti-tracking stone pads will remain in place until the work area is paved or otherwise stabilized.

Off-site traffic improvements will require close coordination with the cities of Boston and Revere as well as certain state agencies. The general contractor will develop a construction-period traffic management plan for review and approval by the cities and state. Signage, traffic cones, drums, and other traffic control measures will be employed during construction to provide positive guidance for traffic near the work zone.

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## **G. OTHER**

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## 4. OPERATION

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### Legal Framework

In determining whether a community is a surrounding community, the commission . . . will evaluate whether: . . . The community will be significantly and adversely affected by the operation of the gaming establishment after its opening taking into account such factors as potential public safety impacts on the community; increased demand on community and regional water and sewer systems; impacts on the community from storm water run-off, associated pollutants, and changes in drainage patterns; stresses on the community's housing stock including any projected negative impacts on the appraised value of housing stock due to a gaming establishment; any negative impact on local, retail, entertainment, and service establishments in the community; increased social service needs including, but not limited to, those related to problem gambling; and demonstrated impact on public education in the community. 205 CMR 125.01(2)(b)(4)

### Executive Summary

#### Community Petition

As of the 2010 Census, over 40 percent of Everett's population is foreign-born (nearly three times the statewide average), a nearly 12 percent increase since 2000, giving Everett the 4th highest proportion of foreign born residents in Massachusetts. During this time, the overall population in Everett also increased by 9.3 percent (nearly three times the statewide average), cementing Everett's place as one of the most densely populated communities in the region.

The combination of relatively low (and decreasing) incomes, low rents and abundance of multi-family residential housing stock has created a crisis in Everett in terms of code enforcement and public safety. Illegal apartments (many of them extremely unsafe), illegal rooming houses and "hot-bedding" (a term used to describe a room shared by multiple persons or families in shifts, most commonly occurring in communities with high populations of low-paid migrant and service workers) are very common and constantly being found by City officials. Numerous instances of threats to public safety (blocked fire exits, dangerous electrical connections, illegal space heaters, basement apartments, lack of bathroom facilities) have taxed the City's inspectional services and public safety departments. Though the Mayor has made this issue a priority, the City simply does not have the resources to address the expected intensification of this problem that would occur with the influx of additional low-wage residents that would likely result from operation of the project.

## Applicant Response

The City cannot demonstrate that it will be significantly and adversely affected by the operation of the gaming establishment.

Far from siphoning patrons from local businesses such as restaurants and retail shops, the gaming establishment will draw ***additional*** visitors to businesses in the City. MSM projects that approximately \$290 million will be spent at regional businesses within the first five years of operation, with a best case scenario of \$3 77 million in ancillary spending at local businesses outside the resort. Exhibit 7, RFA-2 Response 3-21-01. The City will share in this great economic benefit.

A study by Tourism Economics analyzing the regional economic impact of the MSM resort reported that nationwide, at least 60% of casino patrons also visit restaurants, bars, hotels, retail and general merchandise stores, entertainment venues, and other tourist attractions in cities and towns outside of the casino property.

Another study concluded that, in particular, "local restaurants tended to thrive after a casino opened nearby." Exhibit 9, The Innovation Group, Impacts of a Casino at Suffolk Downs on Small Local Business, September 2012, at p. 2. The study reported that, not only does casino development greatly increase revenue at local businesses, but, in turn, wages rise for local employees creating positive multiplier effects throughout the economy.

The one-of-a-kind "Points Partnership Program" that MSM will implement throughout the region. The program will generate millions of dollars of new revenue for retail establishments in the City and the region as a whole. MSM is expecting that hundreds of local businesses will participate in the program, representing a wide and diverse cross-section of the local economy. Almost any retail business that deals in goods and services is eligible to participate.

MSM projects that the Points Partnership Program will generate millions of dollars in new income and attract new customers to local businesses, while increasing tax revenue for local cities and towns. MSM also will engage in direct spending in the local economy as well, committing in the Host Community Agreement with the City of Revere to use best efforts to purchase no less than \$50 million of goods and services for the resort annually from local vendors and suppliers within a 15 mile radius of Revere City Hall. Exhibit 11, Host Community Agreement § 1.H.2. This radius includes businesses in the City.

In short, the gaming establishment will cause no adverse and significant impacts on the local retail establishments in the City as suggested by the Petition. To the contrary, the gaming establishment will stimulate economic development in the City.



While the City makes an oblique reference in its petition to the public safety impacts of the gaming establishment, it has been conclusively established that there is no evidence the resort will contribute any adverse impacts to public safety or to mutual aid agreements with nearby municipalities.

Studies prove irrefutably that these demands will not spill over into the City. Exhibit\_12, The Innovation Group, Casinos and Crime, March 2009. The Report found that while "there is no evidence for city wide increases in major crimes either property or violent," the only even theoretical concern for added crime would be in the "at the neighborhood level where the casino is located" *not* in cities and towns miles away. However, even in the neighborhood immediately adjacent to the gaming establishment, the study determine that "the level of crime is so small as to be overwhelmed by other more significant factors, such as the economy." *Id.* at p.1. A report by the Rappaport Institute for Greater Boston and the John F. Kennedy School of Economics at Harvard University aptly summarize the public safety impacts of the gaming establishment: "In sum, casinos are not associated with general increases in crime rates." *Id.* (emphasis in original)

In any event, the MSM proposal includes the following elements to address public safety

Issues:

- The gaming establishment will be served by the Gaming Enforcement Unit of the Massachusetts State Police and the Revere Police Department, and the Revere Police Department intends to place at least one officer with the Gaming Enforcement Unit. Exhibit 13, RFA-2 Response 5-38-01.
- The resort casino will also be served by MSM's own on-site security, fire, and life safety personnel, including emergency medical technicians. *Id.*
- Revere Police Department Headquarters is adjacent to the resort casino, approximately 1,000 feet from the intersection of Tomasello Drive and Winthrop Avenue. Similarly, a Revere Fire Station also is adjacent to the resort on Winthrop Avenue.
- MSM has committed to establish a Guaranteed Ride Home program at the resort to complement the extensive training of beverage servers, security, valet attendants and other personnel, which along with liquor service shut-off controls and other best practices, are designed to minimize the hazards of potentially intoxicated persons at the resort *Id.*

The Everett petition notes that the City has mutual aid relationships with the Revere Police and Fire Departments, implying that it will be impacted as a result of those obligations. It will not be. The MSM-Revere Host Community Agreement provides for generous impact payments to Revere and expresses the City's intent to direct significant amounts of those funds to the Police and-Fire

Departments, allowing both departments to expand to meet any additional demands occasioned by the operation of the gaming establishment. As stated in the letters attached at Exhibits 14 & 15, both Revere Police Chief Cafarelli and Revere Fire Chief Doherty are of the opinion that there will be no increase in mutual aid assistance from any of Revere's neighboring municipalities as a result of the opening of the proposed gaming facility.

**Letter from Joseph Cafarelli, City of Revere Police Chief, 1/23/2014**

“...[I]t is my opinion that no increase in mutual aid assistance from any of Revere’s neighboring municipalities is to be expected because of the opening of the proposed gaming facility at Suffolk Downs in Revere. The expected financial resources available to the City, as provided in the Host Community Agreement with Mohegan Sun, should adequately support the public safety demands associated with the gaming facility.”

**Letter from Eugene W. Doherty, Chief, Revere Fire Department, 1/23/2014**

“...The expected financial resources available to the City, as provided in the Host Community Agreement with Mohegan Sun, should adequately support the demands on fire and emergency services associated with the gaming facility. ... I have no reason to anticipate any increased demand for mutual aid once the gaming facility is open to the public.”

Consultant Analysis

CITY POINT PARTNERS

This memo concludes that neither the Wynn Casino nor the Mohegan Sun Casino will impact the water and sewer services in proximate communities including .... Everett.

HLT ADVISORY INC.

Everett claims in its petition, that the City would be “significantly and adversely affected by operation of the gaming establishment after its opening, taking into account such factors as...negative impacts on local retail, entertainment and service establishments...” However, the petition provides no detail with respect to the quantum or nature of impacts on these local retail, entertainment and service establishments.

Everett’s claim of “significant and adverse” impacts from the MSM Casino is a broad statement without elaboration or quantification. On the assumption that Everett’s core concern is a fear of reduced visitation and/or spending at local retail, entertainment and service establishments, the following comments are provided:

No empirical evidence supports a 100% trade-off between dollars spent at a casino and dollars spent on retail, entertainment and services. Several studies have shown the opposite effect, notably:

- The Spectrum Report found that “there has been very little empirical evidence presented on the issue – either for or against casinos...little general empirical evidence exists on the relationships between casinos and non-gambling industries.”
- The Innovation Group Report completed for Suffolk Downs on the potential impact from a casino on entertainment venues, the arts and cultural institutions found that “there is no evidence to suggest that local entertainment or cultural institutions will suffer declines in visitation as a result of the advent of casinos.”

In fact, our experience suggests that limited direct cannibalization of retail, entertainment and similar business spending occurs.

**Repatriation of gaming spending by Massachusetts residents**--Neither Everett’s petition nor MSM’s response to the petition addresses the likelihood of repatriation of gaming spending by Massachusetts residents at out-of-state casinos (together with the recapture of spending associated with travel and entertainment purchases at out-of-state casinos). The Center for Policy Analysis Report estimated that Massachusetts residents spend \$710 million annually at six casinos located in Connecticut (i.e., Foxwoods and Mohegan Sun), Rhode Island (i.e., Twin River, Newport Grand) and Maine (i.e., Hollywood Bangor, Oxford Casino).

A significant portion of the gaming and non-gaming spending generated within the immediate Revere market area could reasonably be expected to be redirected to the proposed MSM Casino once operational. This repatriation of resident dollars (not only gaming spend, but also associated travel expenses) will add to the available entertainment dollars in the State.

**Potential Positive Impacts**—The Everett Petition makes no reference to positive impacts from a casino located in Revere. Positive impacts to the region arising from MSM casino development and operations include:

- Direct employment—MSM proposes to hire 2,845 permanent staff to support operations that will presumably live in communities throughout the region. Everett businesses (retail, entertainment, cultural etc.) could experience the benefits of an employee’s increased payroll and spending potential generated through casino operations.
- New visitors to the area—The PKF Report projects that 15% of Casino visits will be generated from outside the Suffolk/Norfolk/Essex/Middlesex area; about 1 million visits/year. These new visitors represent a market opportunity for Everett’s retail, entertainment and cultural establishments.
- Purchases of Goods and Services – The Host Community Agreement with the City of Revere, commits to not less than \$50 million in annual spend for goods and services within a 15-mile radius of the Casino.

These issues are relevant in assessing the potential negative impacts on businesses in Everett.

Based on our review of the materials submitted by the City, our understanding of the proposed MSM Casino project and our knowledge of the broader gaming industry we do not find there to be any meaningful negative impacts on Everett's local retail, entertainment and service establishments from the proposed MSM Casino in Revere. Further, we believe opportunities may exist for these businesses to work with MSM in joint marketing and/or promotional activities for mutual benefit.

### MARK VANDER LINDEN

In the petition, the City of Everett cites general concerns about an increased "social service needs" should a Mohegan Sun casino be located in Revere.

Mohegan Sun's RFA-2 application describes numerous policies currently in place at their existing operation as well as additional measures they will take to mitigate problem gambling and related social problems.

One of the main negative impacts of gambling is problem or disordered gambling. There are a host of issues associated with problem gambling. Social impacts include things such as mental health problems, suicide, family/relationship problems and divorce. Many studies have found a relationship between proximity to gambling venues and the prevalence of problem gambling.

There does appear to be a positive correlation between casino proximity and increase in drunk driving incidents. Below are three studies that support this.

It seems logical to conclude that the increase in persons with gambling disorders would create a burden on the Saugus' social service agencies. However, as pointed out by Dr. Williams, co-principal investigator on MGC's SEIGMA project, the bulk of the impacts tend to be social/nonmonetary in nature because only the minority of problem gamblers seek or receive treatment, and only a minority typically have police/child welfare/employment involvement. That being said, it is difficult to accurately predict the actual impact as ultimately it will vary between jurisdictions depending on the type of gambling introduced and the magnitude of the change.

The question, to what extent will the introduction of a gaming facility create negative impacts on any specific community is complex and difficult to answer. However, the Commission is currently working closely with SEIGMA/UMASS Amherst to conduct a controlled before-after comparison of changes in rates of problem gambling and numerous social and economic indices coincident with the introduction of a gaming facility. The ongoing findings of this study will provide the most accurate determination of what the true social and economic impact is on host and surrounding communities. A more precise understanding of the impacts will inform the best use of the **Public Health Trust Fund** which was created to assist social service and public health programs to mitigate the potential addictive nature of gambling and the **Community Mitigation Fund** which was created to assist the host and surrounding communities in offsetting costs related to the construction and operation of a gaming establishment.



## **A. COMMUNITY PETITION**

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The estimated median family income in Everett is \$46,674-far below the statewide median of \$62,859. Residential rents in Everett are also far below the regional average, making Everett attractive to service-sector and other low-wage employees.

## **B. APPLICANT RESPONSE**

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### **A. The Gaming Establishment Will Inject Hundreds of Millions of Dollars into Local Economies, Draw New Customers, and Increase the City's Tax Base**

. In the same manner, the addition of thousands of high-paying jobs at the MSM resort will create new sources of revenue that will be spent locally in the employees' communities. Id. The Innovation Group study based its conclusion that the gaming establishment would provide substantial economic benefit to local businesses, such as those in the City. Those studies are persuasive in isolation, however they omit perhaps the most positive economic benefit MSM will provide to the City: Exhibit 10, Mohegan Sun Marketing Partnership.

The way the program works is simple. MSM patrons who sign up for the Mohegan Sun rewards program earn "Momentum Points" when gaming, shopping, and dining at the resort by providing a Rewards Card. Id. The business accepts these points from the customer and MSM reimburses the business for the cost of the services or goods redeemed by the customer at a negotiated rate. Id. MSM will also prominently feature and market participating businesses in its promotional materials and programs.

### **B. The Gaming Establishment Will Create No Impacts on Public Safety.**

. Id. At pp. 1, 23.

*Mohegan Sun Revere*

**Everett**

Exhibit 8 to Response to Petition

Tourism Economics

*The Economic & Fiscal Impacts of the Proposed Mohegan Sun Massachusetts Casino,  
December 2013*

This report forecasts the economic and fiscal (tax) impacts of *Mohegan Sun Massachusetts* on Suffolk County and the State of Massachusetts. The City of Everett is located in Middlesex County.

The report states that *Mohegan Sun Massachusetts* will generate significant economic impacts as expenditures ripple through the local, regional, and state economies. Expenditures fall into three categories:

- (1) one-time expenditures during construction and development
- (2) ongoing operational expenditures
- (3) ancillary spending by casino patrons at outside businesses

The report cites a 2011 survey conducted by the American Gaming Association. Of the casino patrons who responded to that survey, nearly 60% indicated that they visited attractions in the area outside casino properties, shopped at local retailers, and ate at dining establishments outside casino properties.

Approximately 8.1 million patrons are expected during the first year of operation. Total ancillary patron spending during the first year of operations is forecast to be approximately \$46.1 million.

**Economic Impacts in the State of Massachusetts Attributable to Operations and Ancillary Spending\* During First Year of Operation (\$ millions)**

\* Spending by casino patrons at outside businesses

		<b>Operations</b>	<b>Ancillary Spending</b>	<b>Total</b>
<b>Output Impacts:</b>	Expenditures - Direct	\$290.4	\$36.2	\$326.6
	Expenditures - Indirect	\$113.6	\$12.0	\$125.6
	Expenditures - Induced	\$146.0	\$17.9	\$163.9
	<b>Total Economic Output</b>	<b>\$550.0</b>	<b>\$66.1</b>	<b>\$616.1</b>
<b>Job Impacts:</b>	Jobs - Direct	3030	641	3671
	Jobs - Indirect	722	72	794
	Jobs - Induced	999	123	1122
	<b>Total</b>	<b>4,751</b>	<b>835</b>	<b>5586</b>
<b>Salary and Wage Impacts:</b>	Salaries & Wages - Direct	\$127.8	\$18.6	\$146.3
	Salaries & Wages - Indirect	\$46.1	\$4.5	\$50.6



	Salaries & Wages - Induced	\$53	\$6.5	\$59.5
	<b>Total</b>	<b>\$226.9</b>	<b>\$29.6</b>	<b>\$256.5</b>

The report states that *Mohegan Sun Massachusetts* will also generate significant fiscal (tax) impacts, as follows:

**Gross Gaming Revenue & Estimated Gaming Taxes  
(\$ Millions in Inflated Dollars)**

<b>Gaming Taxes</b> (25% of Gross Gaming Revenue)	\$214.5	\$221.0	\$227.6	\$232.2	\$236.8
<b>Annual License Fees</b> (\$600 per slot machine)	\$2.4	\$2.4	\$2.4	\$2.4	\$2.4
<b>Share of Annual Public Health Trust Fund Fee</b> (65% of \$5 million annual fee)	\$3.3	\$3.3	\$3.3	\$3.3	\$3.3

**Non-Gaming Tax Revenues (State, Local and Federal) Attributable to Mohegan Sun  
Massachusetts  
(\$ Millions in 2016 Dollars)**

One-Time Tax Impact Attributable to Development/ Construction: **\$50 million**

Annual Tax Impact Attributable to Casino Operations and Ancillary Spending (First Year of Operations): **\$124 million**

**Letter from Joseph Cafarelli, City of Revere Police Chief, 1/23/2014**

“...[I]t is my opinion that no increase in mutual aid assistance from any of Revere’s neighboring municipalities is to be expected because of the opening of the proposed gaming facility at Suffolk Downs in Revere. The expected financial resources available to the City, as provided in the Host Community Agreement with Mohegan Sun, should adequately support the public safety demands associated with the gaming facility.”

**Letter from Eugene W. Doherty, Chief, Revere Fire Department, 1/23/2014**

“...The expected financial resources available to the City, as provided in the Host Community Agreement with Mohegan Sun, should adequately support the demands on fire and emergency services associated with the gaming facility. ... I have no reason to anticipate any increased demand for mutual aid once the gaming facility is open to the public.”

**JANUARY 29, 2014 – MOHEGAN SUN COMMENTS ON OPERATION**

24 MR. BAKER: Operations, I just want to point  
out  
1 that even though again, Counsel didn't bring it  
2 up, it's in their petition. that they will be getting.  
8 And then as it relates to the issue  
9 of code enforcement and hotbedding, I think  
10 that the Commission's very aware of the fact  
11 that in our studies we submitted in our RFA-2  
12 and in other studies the Commission is aware,  
13 there is no real evidence that there was a  
14 negative impact on housing in the region.

15 We spent a lot of times thinking  
16 about this. We were required to study the  
17 matter in our Revere negotiations. So, there's  
18 extensive research on this question.  
19 This project is a legally binding  
20 commitment to use best efforts to hire 75  
21 percent of its workforce within 15 miles of the  
22 project. There is no expectation that there  
23 are going to be a bunch of people moving in  
24 from somewhere and just camping out.

## C. RPA ANALYSIS

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### Casino-Related Vehicular Accidents and DUI

Studies have shown that casino traffic is more prone to accidents, such as drunk-driving incidents, than regular traffic. The Secretary should require the Proponent to address the likelihood of an increase in accidents in the FEIR. The Proponent should take into account accidents involving patrons travelling to and from the Project by vehicle, bicycle and foot, even when those accidents occur relatively far from the site itself. The Proponent should analyze the likelihood of whether the number of DUI-related accidents will increase and include a clear explanation of what steps will be taken to proactively minimize drunk driving and the accidents that may occur as a result (e.g., education programs, serving of alcohol, mitigation to Police, Fire and Emergency-management departments).

MAPC has located several resources that address the likelihood that casino traffic is more prone to accidents. The resources and their key findings are summarized below. The Proponent should review and respond to this information.

Chad D. Cotti and Douglas M. Walker, "The impact of casinos on fatal alcohol-related traffic accidents in the United States," *Journal of Health Economics*, 2010, pp. 788-796

This study explored whether there is a link between casino expansion and alcohol-related fatal traffic accidents by looking at the timing and locations of casino openings over a 10-year period and isolating the impact of casino introduction on alcohol-related fatal accidents. Results indicate that there is a strong link between the presence of a casino in a county and the number of alcohol-related fatal traffic accidents. Specifically, the study found that alcohol-related fatal accidents increased by 9.2 percent in counties with casinos.

Spectrum Gaming Group, *Gambling in Connecticut: Analyzing the Economic and Social Impacts*, June 22, 2009.

In 2009, Norwich, CT, located near Mohegan Sun and Foxwoods, reported that DUI arrests have more than doubled since 1992. The nearby towns of Montville and Ledyard also experienced significant increases. Roughly 20 percent of the motorists in Montville, Ledyard and North Stonington arrested for DUI acknowledged to police that their last drink was at a casino (page 13).

## D. DEIR ANALYSIS

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### NPC Comments by Massachusetts Water Resources Authority – 3/14/14

#### **Wastewater**

The NPC estimates that the proposed project in Revere would generate 241,518 gallons per day (gpd) of new wastewater flow, which would be discharged to a gravity main system with flow deficiencies. The proponent is proposing to design and construct a sewer line mitigation.

### **Wastewater Flows**

According to the NPC, the Proponent -is currently developing an off-site sanitary sewage improvement strategy in cooperation with the City of Revere. The proposed strategy will include improving and expanding the capacity of an existing 21-inch city sanitary sewer that connects the Beachmont neighborhood with a 36-inch by 40-inch city gravity sewer located in Revere Beach Parkway. The Project will connect to a city sewer manhole (CH-025-P) located in the intersection of North Road and Winthrop Avenue.

The 36-inch by 40-inch city sewer conveys flows to MWRA's Revere Extension Sewer, which in turn conveys flows from Revere, City of Chelsea and other communities to MWRA's Chelsea Branch Sewer and Chelsea Creek Headworks. During large storms, sanitary flows and infiltration and inflow (I/I) from the City of Revere's and other communities' collection systems, together with sanitary flows and stormwater from the City of Chelsea's combined sewer system can overwhelm the capacity of MWRA's Chelsea Branch Sewer, contributing to combined sewer overflow (CSO) discharges to Chelsea Creek at CSO Outfall CHE008.

The NPC reports that the Project will increase wastewater flow from the project site by 241,518 gpd. MWRA's earlier comments stressed that downstream systems are subject to surcharging, that high hydraulic grade lines may affect service, and combined sewer overflows occur during wet weather. MWRA pointed out that the Proponent would need to offset the Project's increase in wastewater flow through infiltration and inflow (I/I) removal at a flow rate of 4:1, in accordance with Massachusetts Department of Environmental Protection (DEP) policies.

MWRA is implementing an \$888 million program of local and regional wastewater system improvements to control CSO discharges and improve receiving water quality, including the water quality of Chelsea Creek and Boston Inner Harbor. The impacts of new sanitary flows to the local sewers and MWRA facilities should be fully offset to help ensure that the benefits of CSO control, including water quality improvements, will be realized and sustained for the long term. Given the risks in the downstream system with increased flow, MWRA looks forward to reviewing the results of the Proponent's ongoing flow measurements, its evaluation of impacts to the sewer system, and its plan to mitigate the impacts in a Final Environmental Impact Report. Above all, the mitigation must be targeted toward the portions of MWRA's systems that will be directly affected by the Project's flows. Since new flows from the site will be greater than 50,000 gpd, a sewer extension/connection permit will be required under the current regulations. Additional information on the sewer extension and connection regulations is available on the MassDEP website: <http://www.mass.gov/dep/service/regulations/314cmr07.pdf>. Flows from the entire project must be included in the MassDEP Sewer Connection Permit Application. Wastewater generated by the project will discharge into the City of Boston's sewer system and ultimately flow to the MWRA's Deer Island Wastewater Treatment Facility.

MassDEP collaborates with the MWRA and its member communities, (including Boston), in implementing a flow control program in the MWRA regional wastewater system to remove extraneous clean water, which is referred to as infiltration/inflow (I/I) from the sewer system. Proponents adding significant new wastewater flow participate in the I/I reduction effort to ensure that the additional wastewater flows from their projects are offset by the removal of I/I, which is typically at a rate of four gallons of I/I removed for every gallon of wastewater added. In accordance with the provisions of the MassDEP policy on I/I mitigation requirements in MWRA communities, (available at <http://www.mass.gov/dep/water/laws/mwraii09.pdt>), I/I mitigation is a required element of a MassDEP sewer connection permit for projects which

generate greater than 15,000 gallons per day of wastewater flow where a project exceeds any MEP A threshold for an EIR or if the project has a significant risk of creating conditions leading to a sanitary sewer overflow. Given the scope and impacts of the proposed project, and the need for I/I mitigation, the proponent should arrange to meet with MassDEP and the City of Revere to develop a plan to meet the mitigation requirements of the MassDEP I/I Policy

## E. CONSULTANT ANALYSIS

### CITY POINT PARTNERS:

Surrounding Community Impacts – Water and Sewer  
 City Point Partners LLC  
 2/13/2014 (Revised 3/14/2014)

(for Wynn Casino) Saugus and Cambridge, and (for Mohegan Sun Casino) and Somerville.

The MWRA provides the City of Revere with water and wastewater services. The MWRA has ample capacity to meet the additional flow demands resulting from the Mohegan Sun Casino as demonstrated by the following table.

MWRA System	WATER, MGD			WASTEWATER, MGD		
	2010	2011	2012	2010	2011	2012
Average Day	204.3	196.6	194.7	357.8	378.8	291.7
Max Day	310.5	307.4	290.1	1261.6	832.7	834.7
Capacity, Avg.			312.0			436.0
Capacity, Peak Day						1,270.0
<b>City of Revere</b>						
Average Day	4.13	3.94	3.80	7.69	8.38	6.38
Max Day	6.00	6.09	4.51	25.15	21.43	18.32
<b>Casino (projected)</b>						
Max Day			0.27			0.24
% of MWRA Avg. Capacity			0.09%			0.05%

**Water:** The City of Revere will provide water service to the Mohegan Sun Casino. Mohegan Sun proposes to connect to existing 8-inch service lines connected to an existing 14-inch water main in Winthrop Street. In its NPC, Mohegan Sun states that it will also connect to an 8-inch water line in Tomasello Drive to provide a looped system and redundancy for the Project. In a comment letter dated March 7, 2014 the Boston Water and Sewer District stated that it will not permit an interconnection of its Tomasello 8-inch line with the City of Revere’s water distribution system. Nevertheless there is ample water service available through the Revere system. Everett and Somerville receive water directly from MWRA. There will be no impacts to these communities resulting from the Wynn Casino, nor to any other communities served by the MWRA.

**Wastewater:** Mohegan Sun will connect to the City of Revere sewer system. Mitigation will include upgrading sewers in Winthrop Avenue and offsetting the Project’s increase in wastewater flow through I/I removal at a flow rate of 4:1. Everett and Somerville are both independently connected to the MWRA wastewater system. The Project will have no impacts to wastewater systems and capacity for Everett , Somerville, or other MWRA-served communities.

**Documentation**

In addition to the Exhibits attached to the Mohegan Sun RFA-2 Application, the following documents were reviewed:

**Mohegan Sun**

1. City of Everett's Petition for designation as a Surrounding Community, January 13, 2014
2. Somerville Petition for designation as a Surrounding Community, January 13, 2014
3. Mohegan Sun Notice of Project Change dated January 31, 2014
4. Comment letters regarding the NPC from the following:
  - a. Boston Water and Sewer Commission, March 7, 2104
  - b. Everett, March 6, 2014
  - c. MWRA, March 7, 2014
  - d. Revere, March 14, 2014
  - e. Somerville, March 4, 2014
  - f. MassDEP, March 7, 2014
  - g. Boston Harbor Association Draft Comment Letter, March 14, 2014

## **HLT: CITY OF EVERETT SURROUNDING COMMUNITY STATUS PETITION**

As requested, we are submitting this letter report with respect to a request by the City of Everett (the “City” or “Everett”) to be declared a “Surrounding Community” as set out in MGL c. 23K 17(a) and 205 CMR 125.01(2). The Surrounding Community request is being made in response to an Application by Mohegan Sun Massachusetts, LLC (“MSM”) for a proposed casino (the “Casino”) in Revere, Massachusetts. This report outlines the steps we took to conduct the analysis together with our conclusions.

### **1. BACKGROUND**

In accordance with MGL c. 23K 17(a) and 205 CMR 125.01(2), any Massachusetts community has the right to petition the Commission for declaration as a Surrounding Community if the community can: 1) demonstrate negative impacts from a gaming development and 2) has requested and been denied Surrounding Community status by an Applicant. In consideration of a community petition, the Commission must consider various factors and evaluate:

- The community’s proximity to the host community and the gaming establishment.
- The impact on transportation infrastructure in the community by the gaming establishment.
- The noise, traffic and environmental impacts on the community during construction of the gaming establishment.
- The negative impact the gaming establishment could have on local, retail, entertainment and service establishments in the community.
- Any other relevant potential impacts to the community.

The City of Everett has been seeking Surrounding Community status with respect to the Casino for some time, initially in correspondence with Suffolk Downs and more recently (as the ownership structure of the project changed) with MSM. Having failed to communicate with MSM, the City petitioned the Commission for Surrounding Community status in a January 13, 2014 letter (the “Everett Petition”). MSM subsequently responded to the City’s petition by rejecting its request for Surrounding Community status in a letter dated January 23, 2014. Both parties appeared before the Commission on January 29, 2014.

### **2. OBJECTIVE AND SCOPE**

The Commission engaged HLT<sup>1</sup> to comment on the potential impacts that a Category 1 Casino, located in Revere, might have on the local retail, entertainment and service establishments in Everett.

To complete this assessment HLT:

- Reviewed the Petition and related correspondence between the City, MSM and/or the Commission.
- Reviewed the rebuttal to Everett’s Petition (dated January 23, 2014), prepared by Foley Hoag, LLP, and attachments referenced therein, including:
  - o The Economic & Fiscal Impacts of the Proposed Mohegan Sun Massachusetts Casino, December 2013, prepared by Tourism Economics (the “Tourism Economics Report”).
  - o Market Study with Gaming Revenue Projections: Proposed Mohegan Sun Massachusetts Casino Resort, December 18, 2013 by PKF Consulting (the “PKF Report”).
  - o Impacts of a Casino at Suffolk Downs on Small Local Business”, September 2012, prepared by Innovation Group prepared for Suffolk Downs (“the Innovation Group Report”).
- Reviewed the following background documents:
  - o Comprehensive Analysis: Projecting and Preparing for Potential Impact of Expanded Gaming on Commonwealth of Massachusetts, August 2008 (together with March 2010 update), by Spectrum Gaming Group, prepared for the Commonwealth of Massachusetts (the “Spectrum Report”).
  - o Massachusetts Statewide Gaming Report, June 2010, prepared by the Innovation Group for the Massachusetts Senate, Commonwealth of Massachusetts.
  - o New England Casino Gaming Update, 2013 prepared by the Center for Policy Analysis, University of Massachusetts Dartmouth (the “Center for Policy Analysis Report”).
- Observed the Commission’s January 29, 2014 meeting where both the City and MSM presented their respective positions on the issue.



- Accessed other information and benchmarks in our files relevant to this situation. Upon completion of these steps we completed the following letter report.

<sup>1</sup> HLT Advisory is a Toronto-based consultancy focused on the gaming, tourism, accommodation and leisure industries. HLT has a significant public- and private-sector client base within these industries and has completed a broad range of market assessment, bid process, economic impact and strategic planning engagements across North America as well as in Asia, Europe and the Caribbean.

### **3. BASIS FOR THE EVERETT PETITION**

The basis for the City's request is that:

- the City borders both Boston and Revere and is proximate to the MSM casino;
- patrons of the Casino will cause stresses on City transportation infrastructure (and construction prior to Casino opening will also generate negative transportation impacts); and
- operation of the Casino would create public safety impacts, increased demand on municipal services, stresses on the City's housing stock and educational resources, negative impacts on local retail, entertainment and service establishments, increased social service needs, and impacts on public education.

HLT's analysis is focused solely on the potential impacts on Everett's local retail, entertainment and service establishments and broader business-related economic impacts.

### **4. COMPARISON OF THE CAESARS AND MSM PETITION**

The Everett Petition notes the modification to the original casino proposal (i.e., a joint venture between Suffolk Downs Racetrack and Caesars Entertainment for a site straddling the Revere-Boston boundary) with the current MSM proposal (i.e., a landlord tenant relationship between Suffolk Downs and MSM for a site wholly contained within Revere). The Caesars proposal was rejected by the citizens of East Boston in a November 5, 2013 ballot. The MSM proposal was prepared between November 6, 2013 and the December 31, 2013 deadline for submission of Category 1 Applications.

The City asserts that the MSM proposal provides few details on the impacts the Casino is likely to have on the nearby communities.

The primary differences between the original Caesars and current MSM proposals center around ownership/operating models while the main non-gaming elements (i.e., hotel, F&B, retail) appear to be relatively similar, specifically:

- Caesars proposal —two hotels (450 rooms), 26,000 to 48,000 sq. ft. of entertainment/meeting space, 10 to 17 food and beverage venues (including fine dining, bars/nightclubs), a spa and 30,000 sq. ft. of retail space.
- MSM-- two hotels (500 rooms), 38,000 sq. ft. of entertainment/meeting space (950 seats), 20 food and beverage venues (including fine dining, bars/nightclubs), a spa, fitness center, greenhouse and retail shopping pavilion.

From the perspective of impacts on local retail, entertainment and service establishments, the non-gaming elements of the two proposals are similar.

## 5. THE MSM REBUTTAL

The January 23, 2014 letter prepared by Foley Hoag, LLP identifies several areas where the Casino is expected to have a positive impact on the host and surrounding communities. The rebuttal letter did not speak to specific concerns raised by Everett as none were identified with respect to local retail, entertainment and service establishments.

Broadly, the Foley Hoag letter asserts that:

- **The gaming establishment will inject hundreds of millions of dollars into local economies, draw new customers, and increase the City's tax base.** The PKF Report estimates that 1.668 million visits/year will occur at the Casino from New England residents that live outside Suffolk/Norfolk/Essex/Middlesex counties and an additional 249,000 visits by tourists to the area. The Tourism Economics Report projects New England residents will spend \$13.76 million/year on goods and services at establishments outside the MSM Casino but during the trip to/from the casino. Tourist visit spending will create an additional \$9.35 million/annum in non-gaming spending.
- **The gaming establishment will create significant positive impacts on the region and the City.** MSM's Application commits to using best efforts to hire 75% of its permanent workforce from communities within 15 miles of Revere and to purchase no less than \$50 million annually from local vendors. MSM's operating expenses are projected to be greater than \$300 million (net of gaming taxes) in the initial year of operations including \$123 million in payroll for 3,000 employees.

The proximity of the City to the MSM Casino suggests opportunities will be created for employment and providing goods and services to the Casino—and Casino patrons—from across the region.

## 6. ISSUES AND CONSIDERATIONS

:

- **Demand substitution**—reflects the perception that any dollar spent at a casino (on gaming or non-gaming activities) comes at the expense of existing spending on retail, entertainment and service establishments within the same market area. :

## 7. CONCLUSION

### **LDS CONSULTING GROUP - FEBRUARY 27, 2014**

As requested, we are submitting this letter report with respect to the City of Somerville and City of Everett in connection with their petitions to be designated as a “Surrounding Community” with regard to the proposed Category 1 gaming facility by Mohegan Sun Massachusetts LLC (“Mohegan”) in Revere, MA (the “Subject Property”). This letter outlines the steps we took to conduct our analysis as well as our conclusions. The Subject Property will include:

- A casino (“the Casino”) with approximately 4,000 slot machines, 100 table games and 20 poker tables (4,720 gaming positions). The Casino will be de-signed to enable expansion to 5,000 gaming positions.
- Two attached hotels totaling between 500 and 550 rooms.
- Approximately 100,000 to 150,000 square feet of purpose built dining, lounge, entertainment and retail space.
- A spa of 12,000 square feet.
- Adequate structured and surface parking, with valet se vice offered.
- The Mohegan Sun Player’s Club frequent player program.

### **Background**

In accordance with the Massachusetts General Laws, c. 23K 17(a) and 205 CMR 125.01(2), any Massachusetts community has the right to petition the Massachusetts Gaming

Commission (the “Commission”) for declaration as a Surrounding Community if the community can: 1) Demonstrate negative impact from a gaming development and 2) has requested and been denied Surrounding Community Status by an Applicant. In consideration of a community petition, the Commission must consider various factors and evaluate:

1. The community’s proximity to the host community and the gaming establishment.
2. The impact on transportation infrastructure in the community by the gaming establishment.
3. The noise, traffic and environmental impacts on the community during construction of the gaming establishment.
4. The negative impact the gaming establishment could have on local, retail, entertainment and service establishments in the community.
5. Any other relevant potential impacts to the community.

LDS has been asked to examine potential impacts to housing, schools and code enforcement in Everett. In their petition, they allege that “Everett’s demographics and proximity to the Project Site are such that it is likely to experience significant housing, public safety and code enforcement impacts”. They site demographics and attach a letter from the City Planner James Erickson in support of their claim.

### **Methodology**

We have reviewed all or some of the following documents on this matter:

1. Mohegan Application and presentation
2. Impacts of a Casino at Suffolk Downs on Property Values prepared for Mohegan Sun September 2012 by The Innovation Group (the “Innovation Report”).
3. Host Community Agreement
4. Everett Petition and Exhibits
5. Somerville Petition
6. Portion of the gaming legislation related to Surrounding Communities
7. Census ACS reports and Esri reports prepared by our office.

### **Conclusion**

### **Research**

The Innovation Group illustrated based on case studies that there is no negative effect on Schools and Housing as a result of a resort casino being built in urban areas that are already

populated and have infrastructure in place. They pointed only to Mohegan Sun in Connecticut as an example where there were housing shortages because the casino was developed in a more rural area that did not already have housing and services in place.

**Unemployment**

(the “Communities”) which we used for purposes of examined certain demographics. They also state that In House-training includes substantial regulatory training for problem gaming, ethics, etc. We looked at current information available from the Massachusetts Department of Workforce and Labor Development for the communities and Somerville below.

**Table 1**

<b># of Unemployed Persons -Past 10 Years</b>									
<b>Year</b>	<b>Boston</b>	<b>Chelsea</b>	<b>Everett</b>	<b>Lynn</b>	<b>Malden</b>	<b>Revere</b>	<b>Saugus</b>	<b>Winthrop</b>	<b>Total</b>
<b>2013*</b>	19,909	1,268	1,404	3,146	1,773	1,833	974	592	30,899
<b>2012</b>	20,626	1,262	1,475	3,438	1,985	1,884	928	620	32,218
<b>2011</b>	22,101	1,367	1,651	3,640	2,245	2,035	1,024	662	34,725
<b>2010</b>	25,106	1,536	1,756	4,009	2,592	2,286	1,205	781	39,271
<b>2009</b>	24,660	1,473	1,639	3,994	2,494	2,222	1,259	779	38,520
<b>2008</b>	16,609	978	1,102	2,660	1,668	1,499	788	502	25,806
<b>2007</b>	13,853	859	940	2,263	1,348	1,238	676	430	21,607
<b>2006</b>	15,135	890	1,000	2,487	1,435	1,348	735	453	23,483
<b>2005</b>	14,951	927	1,006	2,579	1,471	1,324	736	458	23,452
<b>2004</b>	16,410	1,024	1,079	2,784	1,621	1,418	830	505	25,671
<b>2003</b>	19,058	1,207	1,361	3,165	1,940	1,703	881	599	29,914

**Table 2**

<b># of Unemployed Persons -Past 10 Years</b>	
<b>Year</b>	<b>Somerville</b>
<b>2013</b>	2,212
<b>2012</b>	2,135
<b>2011</b>	2,391
<b>2010</b>	2,858
<b>2009</b>	2,846
<b>2008</b>	1,799
<b>2007</b>	1,471
<b>2006</b>	1,597
<b>2005</b>	1,627
<b>2004</b>	1,882
<b>2003</b>	2,295

Table 1 shows that as of December 2013 the communities have a total of 30,899 unemployed persons or job seekers. In addition, Table 2 includes the petitioner Somerville that has a total of 2,212 unemployed or job seekers as of December 2013.

**Table 3 Housing Occupancy and Vacancy**

<b>Housing Occupancy &amp; Vacancy</b>				
		<b>Total Housing Units</b>	<b>Occupied Housing Units</b>	<b>Vacant Units</b>
<b>Boston</b>	Number	272,587	248,704	23,883
	Percent		91%	9%
<b>Chelsea</b>	Number	12,549	11,586	963
	Percent		92%	8%
<b>Everett</b>	Number	16,558	15,285	1,273
	Percent		92%	8%
<b>Lynn</b>	Number	36,231	33,655	2,576
	Percent		93%	7%
<b>Malden</b>	Number	24,293	22,836	1,457
	Percent		94%	6%
<b>Revere</b>	Number	20,958	19,522	1,436
	Percent		93%	7%
<b>Saugus</b>	Number	10,583	10,093	490
	Percent		95%	5%
<b>Winthrop</b>	Number	8,291	7,630	661
	Percent		92%	8%
<b>Total</b>		<b>402,050</b>	<b>369,311</b>	<b>32,739</b>
<b>Avg. Percent</b>			<b>92%</b>	<b>8%</b>

**Table 4 Housing Occupancy and Vacancy**

<b>Housing Occupancy &amp; Vacancy</b>				
		<b>Total Housing Units</b>	<b>Occupied Housing Units</b>	<b>Vacant Units</b>
<b>Somerville</b>	Number	32,471	31,272	1,199
	Percent		96%	4%

Furthermore, while we have not checked with each individual community on production of new homes which could add additional product to the market, LDS does keep an informal data base of developments in the pipeline. We have compiled a list of planned, under construction or completed housing developments for the communities of Boston, Cambridge, Chelsea, Malden, Revere, Somerville and Winthrop, and as summarized on Table 5 below, which shows 30,000 housing units that could be come onto the market.

**Table 5**

Housing Pipeline Tally				
Community	Permit	Planned	Construction	Completed
<b>Boston</b>	3086	7945	2390	1447
<b>Cambridge</b>	2954	250	3206	16
<b>Chelsea</b>			5596	1463
<b>Malden</b>		86	371	
<b>Revere</b>		194		
<b>Somerville</b>		14	482	184
<b>Winthrop</b>	27			
<b>Total</b>	<b>6067</b>	<b>8489</b>	<b>12045</b>	<b>3110</b>

**Code Enforcement**

As noted previously, the Everett petition states concern over code enforcement. According to the City’s website they offer a Home Improvement Program. LDS spoke with Mazie, the Deputy Director of Planning for the City of Everett. Everett is a “mini-entitlement” community for the federal Community Development Block Grant Program. According to Mazie, the City of Everett has received \$900,000 a year for the last two years allocated as follows: \$400,000 for infrastructure, \$125,000 for housing rehabilitation, \$ 100,000 for public service agencies and the remaining \$275,000 for administration. Three years ago they only received an allocation of \$200,000. Therefore, their funding has increased by 450% in just two years which is surprising because most communities are seeing decreases in funding from this program.

Their inspectional services department appears to be robust as it identifies 19 staff members including 5 code inspectors, a director of code enforcement and a clerk of code enforcement.

**Therefore based on the increased CDBG funding and increased Town Revenues, it would appear that the City of Everett is receiving additional funding to address its existing inspectional services issues and support its code enforcement department. Furthermore, any new construction or rehabilitation associated with housing new workers to the area will have**

to pay building permit fees and according to the Innovation Report, should also increase the real estate tax base and therefore presumably offset any staff costs.

**School Age Children/Household Size**

The next table examines in the change in family size from 2000 to 2010 based on the United States Census taken from Esri Reports we ran for Everett, Revere and Somerville.

**Table 6**

Change in Average Household Size				
	2000	2010	Change 2000-2010	Percent Change 2000-2010
<b>Everett</b>	2.45	2.67	0.22	8.98%
<b>Revere</b>	2.41	2.52	0.11	4.56%
<b>Somerville</b>	2.38	2.29	-0.09	-3.78%

We also examined the change in population by age from 2000 to 2010 for ages 0-14 for the two petitioner communities and the host community Revere. We looked at this as an indicator of how many children may be entering the school system in the future. Table 7 below shows that the number of school age or potential school age children, decreased significantly in Somerville (indicated there could be excess capacity), but has increased in Everett and Revere (indicating increased demand).

**Table 7**

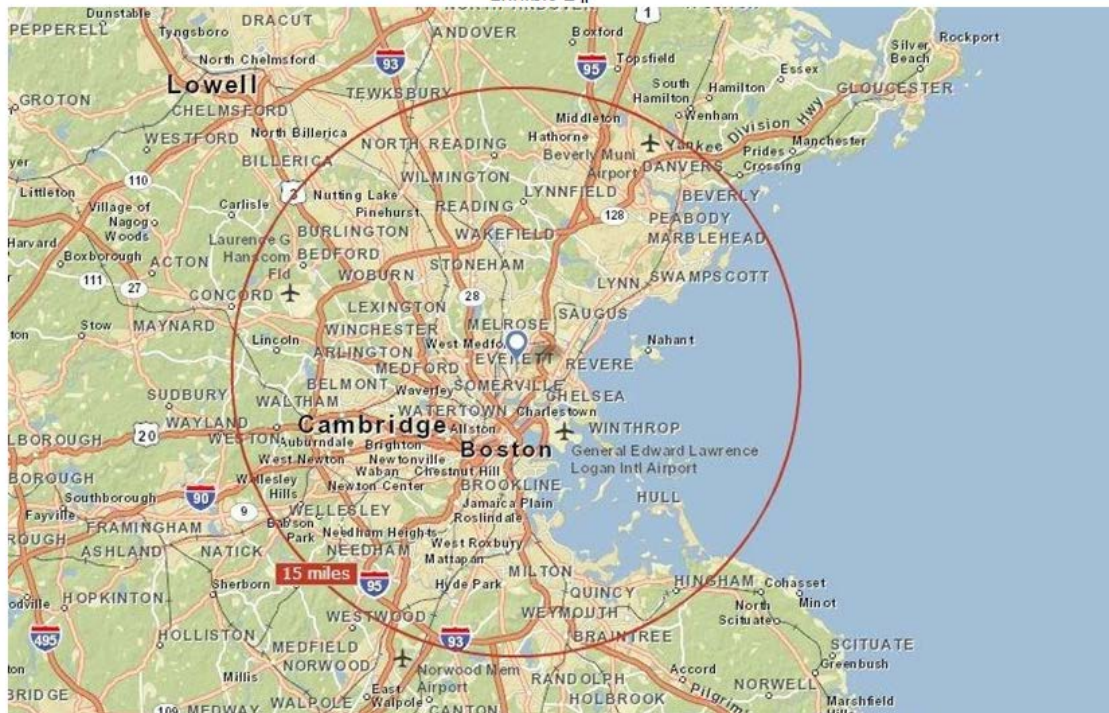
Change in Population 2000-2010			
Ages 0-14	2000	2010	Change
<b>Everett</b>	6,919	7,843	924
<b>Revere</b>	8,397	8,702	305
<b>Somerville</b>	9,671	7,801	-1,870



Exhibit-19



Exhibit-29



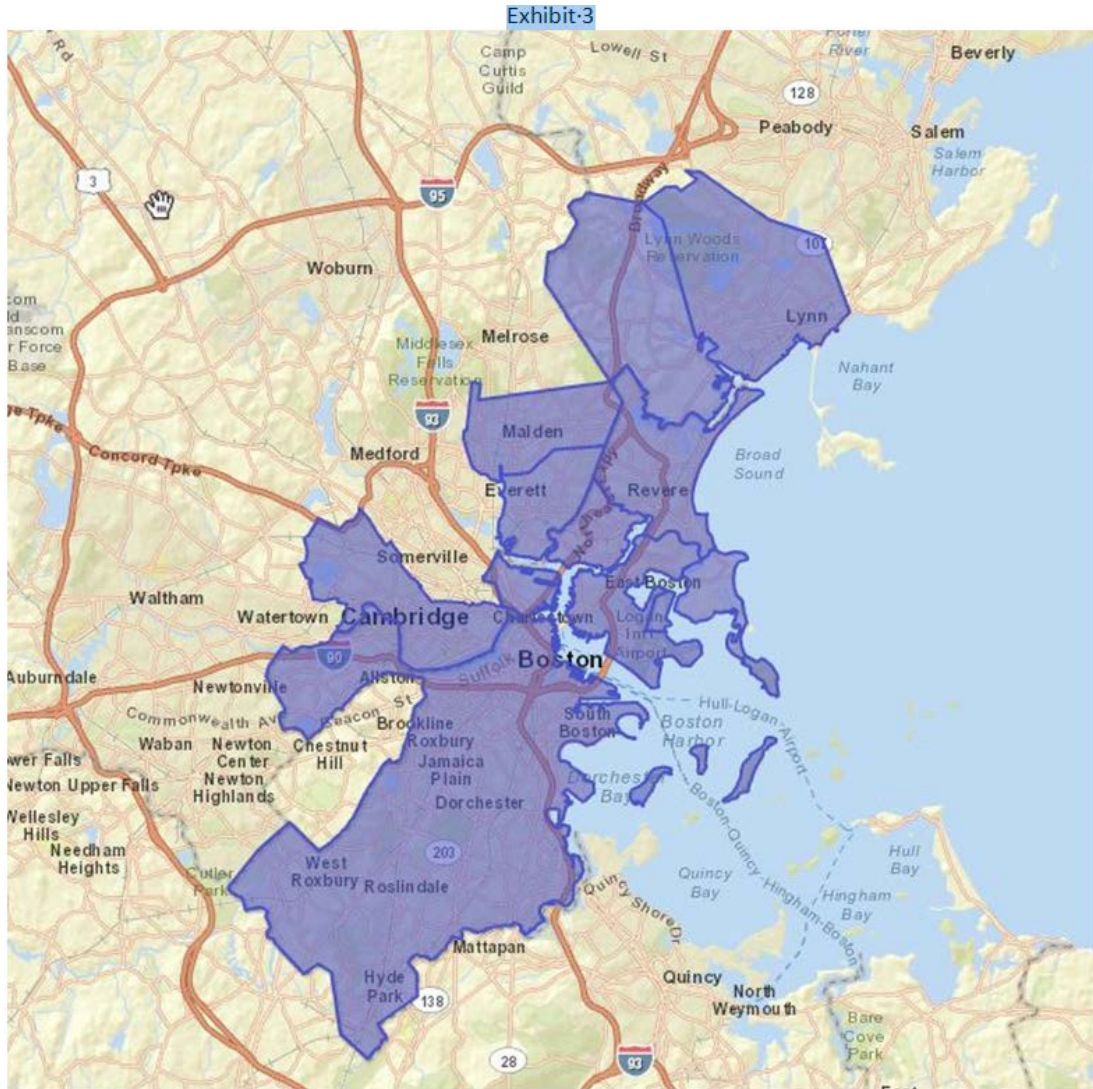


Exhibit 4—Potential Housing Units in the Communities

**MARK VANDER LINDEN ANALYSIS**

On January 13, 2014 the Massachusetts Gaming Commission (MGC) received a petition from the City of Everett to be designated as a surrounding community by Mohegan Sun Massachusetts, LLC.

**A review of evidence about select social and resource impacts associated with the expansion of gambling:**

**Problem and disordered gambling:**

- In 1998, analysis of the U.S. Gambling Impact and Behavior Study data found that location of a casino within 50 miles was associated with approximately double the rate of pathological gambling (Gerstein et al., 1999).
- In a separate U.S. national-level study, Welte et al. (2004) determined that the location of a casino within 10 miles of an individual's home is independently associated with a 90% increase in the odds of being a problem or pathological gambler.
- Shaffer, LaBrie and LaPlante (2004) examined county-level prevalence estimates from the 2000/2001 survey in Nevada in relation to casino availability and found that the four counties with the greatest access to casinos had the highest problem gambling rates, and the four with the least availability had the lowest rates.

**Traffic and drunk driving incidents:**

- Cotti, C. and D.M. Walker. (2010). The Impact of Casinos on Fatal Alcohol-Related Traffic Accidents in the United States, found a strong link between the presence of a casino in a county and the number of alcohol-related fatal traffic accidents. However, the relationship is negatively related to the local-area (county) population.
- Spectrum Gaming Group (2009). Gambling in Connecticut: Analyzing the economic and social impacts. Found a positive correlation between driving-while-intoxicated arrests and legal gambling in Connecticut.
- A study done by Dr. Richard McGowan (2013)<sup>[1]</sup> found a positive correlation between drunk driving arrests for a county and the presence of a casino within that same county. Specifically the study concluded that casino gambling can have serious social costs on a community. In a review done by Williams he found two studies that supported a positive correlation between driving while intoxicated and the presence of a casino.

**Burden on social services:** For example, a new casino in a small community with limited prior exposure to gambling has a much larger impact than if the casino was introduced in a large city that already had easy access to gambling options to a range of gambling options.

**Social and Economic Impact of Gaming in Massachusetts**

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<sup>[1]</sup> McGowan, R. (2013). *Casino Gambling and Drunk Driving: How are Communities Impacted?* Gaming Law Review and Economics. November 10, 2013.



## **F. APPLICATION**

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### **TOURISM DRAW**

#### **1-02 DESTINATION RESORT**

By design and definition, city-integrated resorts weave themselves into the fabric of the places they call home, facing outwards instead of inwards to encourage visitors to flow back and forth between the resort and its surroundings. With the right location, appropriate design and proper execution, and in conjunction with local businesses and services, this re-imagining of the resort casino experience and its placement and role in host and surrounding communities is quite powerful and presents an unrivaled opportunity to partner with our neighbors. The location, physical design, customer experience and extensive network of civic, community and business partnerships of Mohegan Sun Massachusetts (MSM) ideally position us to employ the city-integrated model to the benefit of our host community, Revere, and the entire Greater Boston region.

The city-integrated approach offers resort guests a more authentic city visit by exposing them to the unique cultural, historical, environmental, entertainment and social resources of the region. At the same time, it stimulates economic activity outside the resort by driving patrons to local businesses, attractions and institutions. Integration drives incremental impact, above that of typical casino operations, by ensuring that wallet share and employee efforts stay within the broader community. We will achieve these results not only through collaborations such as cross-marketing but also through our innovative Momentum rewards points program, which will allow resort patrons to redeem credit earned at the resort for goods and services with local, offsite partners.

#### **1-04 COMPETITIVE ENVIRONMENT**

Mohegan Sun Massachusetts (MSM) sees potential competitive threats from five sources outside of Massachusetts: (i) the introduction of gaming in New Hampshire, where there have been legislative fits and starts for several years; (ii) expanded gaming in New York – either convenience casinos or resort gaming – as a result of the successful statewide referendum in November 2013; (iii) the possibility of expanded gaming in Connecticut; (iv) the possibility of expanded gaming in jurisdictions outside of the Northeast – which may reduce a tourist's enthusiasm for traveling far from home for a gaming experience, but also may create new gaming tourists by introducing more people to gaming as entertainment; and (v) internet gaming, which is discussed elsewhere in this application. The location, accessibility, quality and variety of our destination resort in Revere, coupled with the strong branding recognition of the Mohegan Sun name in New England and beyond, will help insulate the project from these competitive pressures. Also contributing to our competitive advantage is our ability to leverage the extensive, existing Mohegan Sun customer lists. MSM will introduce a city-integrated approach, exposing

guests to area businesses, unique cultural, historical, environmental and social resources of the region so we can grow together to extend visitor stays and induce area tourism expenditures.

### **1-06 COLLABORATIVE MARKETING**

The opening of Mohegan Sun Massachusetts (MSM) offers a unique opportunity for all of the tourism and visitor stakeholders in Greater Boston to come together to maximize potential gains for the region's tourism industry. At MSM, we will collaborate with other key tourism industry participants on a shared marketing strategy which, we believe, will kick-start a decade of growth for the region's tourism industry. Working together, agencies such as the Greater Boston Convention and Visitors Bureau, the Massachusetts Convention Center Authority, the Massachusetts Office of Travel and Tourism and Massport, along with area attractions and institutions and attractions such as MSM, can create a collaborative marketing forum. Participants can use such a forum to align the existing tourism marketing platforms to ensure the broadest reach and deepest penetration into key markets, both domestic and international. In addition to aligning platforms, this joint marketing effort can facilitate ongoing and transparent communications between the region's key tourism stakeholders, ensuring that all are informed about developments and future events and can participate in crafting a clear view of the "big picture" for marketing the Greater Boston region and its many assets

### **1-08 BROADENING THE REGION'S TOURISM APPEAL**

We see the opportunity to broaden the appeal of the Greater Boston region in three over-arching ways. The first leverages Mohegan Sun's 17 years of experience building New England customer relationships to attract patrons. The second uses the state and regional stakeholders in the tourist industry to leverage Mohegan Sun's attributes as a new sales tool to attract an increasing critical mass of visitors. Third and importantly, through a variety of cross-marketing opportunities, Mohegan Sun will help to induce local and regional customer sharing. The presence of resort casino gaming undeniably makes Mohegan Sun Massachusetts (MSM) a unique addition to Revere and to the Greater Boston region. Furthermore, as a world-class destination resort casino, MSM is an area at tribute that organizations such as the GBCVB, MCCA and similar stakeholders will want to leverage. MSM views itself as a complement to such efforts. Mohegan also sees itself as a bridge to the North Shore for tourism, lodging and entertainment, particularly in those instances where pieces of a conference or event take place at MSM. Finally, MSM is a central point for cross-marketing with attributes all across the region through points programs, discount arrangements, shuttle services and web marketing. MSM will be the catalyst for tourism growth.

### **2-24 CUSTOMER CROSS MARKETING.**

While none of the Mohegan Sun associated gaming establishments fall beyond the 300 mile radius referred to in this question, we do intend to allow patrons of our Connecticut, Northeastern Pennsylvania and Atlantic City facilities to utilize their earned loyalty points when they make trips to Mohegan Sun Massachusetts (MSM). This will result in a significant amount of trips to Revere that might not otherwise be made, all because the point currency held by these

customers holds a tremendous built-in value. It will also allow Mohegan Sun Massachusetts to hit the ground running with patrons already holding loyalty rewards from casinos in nearby states

2-26 Market Analysis

### **2-33-01 MAXIMUM FACILITY USE**

#### **Maximum Facility Use**

Given the breadth of attractions to the Boston area and beyond, “peak” times are spread throughout the year. As a result, our strategy to make maximum use of the facilities is two-fold:

#### **Capitalize on peak travel times**

Similarly, there are a range of “man-made” events throughout the year that we believe will be attractive to our customer base: from the Head of the Charles regatta, to the Marathon and play-off seasons for Boston’s perennial play-off contender teams. Additionally, there are peak periods that are unique to Greater Boston’s position as one of the world’s leading centers of education (move-in, commencement, sports events) that we believe will allow us to attract and/or further monetize the high end and international visitors to the market.

In addition, the summer months provide an additional opportunity for us with the storied Revere Beach, the nation’s first public beach, located so nearby, Mohegan Sun will market to the waterside advantages and work with Revere to leverage this asset.

#### **Non-Peak**

The Mohegan Sun enterprise holds the largest database of Greater Boston casino accounts among all the Massachusetts gaming license candidates - numbering in the hundreds of thousands; and we also boast millions of customers in our overall New England region database, unmatched by any other casino operated in the world. We will make full use of that customer database to stimulate demand during these off-peak months.

facilities. The facility will provide an ideal addition to area events, meetings and conventions that are booked, and it will serve as an eye-opening sales option to enhance future bookings.

At Mohegan Sun, we will also use our room product to maximize visitation, seeking to provide optimum occupancy during off-peak months. For example, at Resorts Atlantic City, we send out more offers with discounted or free hotel rooms to customers to incentivize them to travel to the market during the late Fall and Winter seasons. When coupled with the Greater Boston region features such as the museums, markets, concert entertainment, sports, the Aquarium and other attractions, the direct marketing effort will help to ensure healthy visitation from outside

of the immediate region. Additionally, we will create more VIP weekend events or casino events (e.g., slot tournaments) to generate traffic.

## **2-35 NEW REVENUE**

In support of our planned resort destination in Revere, Mohegan Sun Massachusetts (MSM) commissioned Tourism Economics, an Oxford Economics Company, to perform a study on the economic and fiscal impacts that such a resort would deliver to the Commonwealth and the Greater Boston region. That study includes data showing the impact that revenues, employment and spending by the resort operation would have on the economy. The study is included as Attachment 2-35-02.

The study calculates the economic benefits in three distinct ways:

- o the expenditures as a result of the construction of the resort;
- o expenditures from ongoing annual operational expenditures; and
- o patron spending at nearby business surrounding the site.

This includes an estimated \$234.4 million in compensation for the construction staff and an additional \$87 million for indirect and induced compensation as the multiplying effect resulting from construction. It further includes expenditures of \$595.1 million in construction related purchases and services, and the calculated indirect and induced effect of such spending to achieve \$1.047 billion in output. Such impacts are expected to be manifested as new economic growth for the region around Suffolk County and the Commonwealth.

Concurrently, expenditures by the new resort facility are expected to total \$290.4 million advancing the total operational economic impact to \$550 million in the first year of operation.

Finally, the \$46.1 million in ancillary patron spending in the first year of operations will generate a direct impact of \$36.2 million. Including indirect and induced impacts the additional economic output will advance to \$53 million. This impact will support salaries and wages in the area and produce 700 jobs, according the study, all of which is attributable to new growth and new revenues to area business.

### 1. Executive Summary

Suffolk Downs announced that it reached an agreement with Mohegan Sun as its development partner and gaming operator for a world-class resort casino on 42 acres of the track's 52 acres in Revere, Suffolk County, Massachusetts.

The partnership teams New England's premier gaming brand with historic Suffolk Downs and will ultimately create a world-class destination, Mohegan



Sun Massachusetts (“the Casino”), which will generate significant economic impacts in the local, regional, and statewide economies.

### 1.1 Economic Impacts

Mohegan Sun Massachusetts will generate significant economic impacts as one-time development expenditures, annual operational expenditures, and annual ancillary spending by casino patrons at outside businesses ripple through the local, regional, and state economies. Suffolk County and the State of Massachusetts will benefit from new economic activity, jobs, and employee salaries and wages.

The Casino’s development period will generate one-time impacts of \$821 million in total economic activity in Suffolk County and \$1.0 billion in the State of Massachusetts, as shown in Figure 1.1.

Figure 1.1: Summary One-Time Economic Impacts Attributable to Mohegan Sun Massachusetts (\$ Millions in 2016 Dollars & Total Jobs)

Description	Suffolk County	MA State

Source: Tourism Economics (2013)

Annual operational expenditures at Mohegan Sun Massachusetts, along with annual ancillary spending by Casino patrons, will generate considerable *ongoing* economic impacts. In the Casino’s first year of operations, Suffolk County will benefit from \$482 million in total economic activity, more than 4,500 total jobs, and \$194 million in employee salaries and wages. The State of Massachusetts will benefit from \$616 million in total economic activity, including \$256 million in employee salaries and wages, supporting nearly 5,600 total jobs, as shown in Figure 1.2.

Figure 1.2: Summary Economic Impacts Attributable to Mohegan Sun Massachusetts Operations & Ancillary Casino Patron Spending in the First Year of Operations (\$ Millions in 2016 Dollars & Total Jobs)

Description	Suffolk County	MA State

Total Economic Impact	\$482	\$616
Total Jobs Impact	4,521	5,586
Total Salaries & Wages Impact	\$194	\$256

Source: Tourism Economics (2013)

### 1.2 Fiscal (Tax) Impacts

The economic impacts outlined above will also generate significant fiscal (tax) impacts as they cycle through the local, regional, and statewide economies. In its first year of operations, Mohegan Sun Massachusetts will generate nearly \$217 million in gaming taxes and Massachusetts Gaming Commission funding. Mohegan Sun Massachusetts’ development period will generate a one-time impact of \$50.0 million in state and local tax revenues, while annual operations and casino patron ancillary spending will generate \$124.0 million in state and local tax revenues in the Casino’s first year of operations.

Figure 1.3: Summary One-Time and Annual Tax Impacts Attributable to Mohegan Sun Massachusetts (\$ Millions in 2016 Dollars)

Description	One-Time Impacts	Annual Impact (First Year of Casino Operations)
Gaming Taxes (25% of Gross Gaming Revenue)	NA	\$214.5
Gaming Commission Funding (\$600 per slot machine)	NA	\$2.4
<b>Total Gaming Tax Revenue</b>	<b>NA</b>	<b>\$216.9</b>
Social Insurance Taxes	\$0.7	\$0.4
Sales	\$16.4	\$35.4
Property & Corporate Taxes	\$15.4	\$78.5
Personal Income Tax	\$15.8	\$8.9
Excise and Fees	\$1.6	\$0.8
<b>Total State and Local Taxes</b>	<b>\$50.0</b>	<b>\$124.0</b>

Source: Tourism Economics (2013)

### 2-35-01 – DETAILED ANSWER

#### New Revenue

In support of our planned resort destination in Revere, Mohegan Sun Massachusetts (MSM) commissioned Tourism Economics, an Oxford Economics Company, to perform a study on the economic and fiscal impacts that such a resort would deliver to the Commonwealth and the Greater Boston region. That study includes data showing the impact that revenues, employment and spending by the resort operation would have on the economy. The study is included as Attachment 2-35-02.

The study calculates the economic benefits in three distinct ways:

- o the expenditures as a result of the construction of the resort;
- o expenditures from ongoing annual operational expenditures; and
- o patron spending at nearby business surrounding the site.

Such impacts are expected to be manifested as new economic growth for the region around Suffolk County and the Commonwealth.

Once the resort opens, the project will generate more than 2,800 direct jobs, and 754 induced and indirect jobs. Additionally the project will help to protect and retain the 800 jobs at Suffolk Downs Racetrack. Including direct, indirect and induced compensation, total salaries and wages are calculated to be \$216.2 million. Concurrently, expenditures by the new resort facility are expected to total \$290.4 million advancing the total operational economic impact to \$550 million in the first year of operation.

Finally, the \$46.1 million in ancillary patron spending in the first year of operations will generate a direct impact of

\$36.2 million. Including indirect and induced impacts the additional economic output will advance to \$53 million. This impact will support salaries and wages in the area and produce 700 jobs, according the study, all of which is attributable to new growth and new revenues to area business.

## **2-35-02 ECONOMIC & FISCAL IMPACTS**

### **1 Executive Summary**

Suffolk Downs announced that it reached an agreement with Mohegan Sun as its development partner and gaming operator for a world-class resort casino on 42 acres of the track's 52 acres in Revere, Suffolk County, Massachusetts.

The partnership teams New England's premier gaming brand with historic Suffolk Downs and will ultimately create a world-class destination, Mohegan Sun Massachusetts ("the Casino"), which will generate significant economic impacts in the local, regional, and statewide economies.

### 1.1 Economic Impacts

Mohegan Sun Massachusetts will generate significant economic impacts as one-time development expenditures, annual operational expenditures, and annual ancillary spending by casino patrons at outside businesses ripple through the local, regional, and state economies. Suffolk County and the State of Massachusetts will benefit from new economic activity, jobs, and employee salaries and wages.

The Casino’s development period will generate one-time impacts of \$821 million in total economic activity in Suffolk County and \$1.0 billion in the State of Massachusetts, as shown in Figure 1.1.

Figure 1.1: Summary One-Time Economic Impacts Attributable to Mohegan Sun Massachusetts (\$ Millions in 2016 Dollars & Total Jobs)

Description	Suffolk County	MA State
Total Economic Impact	\$821	\$1,048
Total Jobs Impact	4,478	7,335
Total Salaries & Wages Impact	\$321	\$469

Source: Tourism Economics (2013)

Annual operational expenditures at Mohegan Sun Massachusetts, along with annual ancillary spending by Casino patrons, will generate considerable *ongoing* economic impacts. In the Casino’s first year of operations, Suffolk County will benefit from \$482 million in total economic activity, more than 4,500 total jobs, and \$194 million in employee salaries and wages. The State of Massachusetts will benefit from \$616 million in total economic activity, including \$256 million in employee salaries and wages, supporting nearly 5,600 total jobs, as shown in Figure 1.2.

Figure 1.2: Summary Economic Impacts Attributable to Mohegan Sun Massachusetts Operations & Ancillary Casino Patron Spending in the First Year of Operations (\$ Millions in 2016 Dollars & Total Jobs)

Description	Suffolk County	MA State
Total Economic Impact	\$482	\$616
Total Jobs Impact	4,521	5,586
Total Salaries & Wages Impact	\$194	\$256

Source: Tourism Economics (2013)

## 1.2 Fiscal (Tax) Impacts

The economic impacts outlined above will also generate significant fiscal (tax) impacts as they cycle through the local, regional, and statewide economies. In its first year of operations, Mohegan Sun Massachusetts will generate nearly \$217 million in gaming taxes and Massachusetts Gaming Commission funding. Mohegan Sun Massachusetts’ development period will generate a one-time impact of \$50.0 million in state and local tax revenues, while annual operations and casino patron ancillary spending will generate \$124.0 million in state and local tax revenues in the Casino’s first year of operations.

Figure 1.3: Summary One-Time and Annual Tax Impacts Attributable to Mohegan Sun Massachusetts (\$ Millions in 2016 Dollars)

Description	One-Time Impacts	Annual Impact (First Year of Casino Operations)
Gaming Taxes (25% of Gross Gaming Revenue)	NA	\$214.5
Gaming Commission Funding (\$600 per slot machine)	NA	\$2.4
<b>Total Gaming Tax Revenue</b>	<b>NA</b>	<b>\$216.9</b>
Social Insurance Taxes	\$0.7	\$0.4
Sales	\$16.4	\$35.4
Property & Corporate Taxes	\$15.4	\$78.5
Personal Income Tax	\$15.8	\$8.9
Excise and Fees	\$1.6	\$0.8
<b>Total State and Local Taxes</b>	<b>\$50.0</b>	<b>\$124.0</b>

Source: Tourism Economics (2013)

### **2-36 MARKETING TO OUT OF STATE VISITORS AND USE OF JUNKETS**

The accessibility of the Resort: drive-in and bus transportation from modern highways to the West, the North and the South will provide an easy drive from the population centers that are served by these thoroughfares. Moreover, the Resort will be just steps from the MBTA’s blue line. Such proximity will serve as a sales tool both for Mohegan Sun marketing and for the regional tourism agencies by highlighting this extraordinary convenience. Using the extensive junket network that Mohegan Sun has established during the last two decades Mohegan proposes to work with MOTT, the Massachusetts Port Authority, and other local tourism organizations to promote the Greater Boston advantages as a more desirable destination and to dramatically increase overnight visitation. We will actively promote the region. Working with the Greater Boston Convention and Visitors Bureau we will establish on-site electronic

concierges to ensure that every visitor has readily available resources to expand their travel experience and we have committed to an on-site 24/7 transportation coordinator who can assist visitors with their transportation needs. **Detail Confidential**

### **3-26-01 COLLABORATIONS WITH TOURISM AND OTHER INDUSTRIES**

#### **The Recognizable Regional Brand**

With an extraordinary customer base in the Commonwealth and throughout the New England region, Mohegan Sun is uniquely positioned to attract new visitors to the Greater Boston area. Our destination resort will induce existing visitors to extend their stays, complement and enhance the hospitality industry of Boston proper and serve as a bridge to the North Shore, allowing that region to achieve greater participation in conference, convention and tourism opportunities.

The more than 5 million patrons in our database center primarily in central New England. No other applicant competing for a gaming license in Massachusetts can boast such a sizeable database of existing patrons, hundreds of thousands of which are in the Commonwealth. This will provide a significant advantage in our initial awareness campaigns and will serve to provide revenues and tourists to MSM and the surrounding region faster than any other competing applicant.

The region knows the Mohegan Sun brand. For more than 17 years, Mohegan Sun has set the standard for quality in hospitality and product. Such attributes set a firm foundation for the collaboration with Massachusetts Office of Travel and Tourism (MOTT), the Massachusetts Port Authority (MassPort), the Greater Boston Convention and Visitors Bureau (GBCVB), the TD Garden, the Massachusetts Convention Center Authority (MCCA), the CitiCenter and the many restaurants and retail establishments that will become our points redemption partners. Through these partnerships, we hope to aid Massachusetts' tourism industry by:

- o extending the average length of stay;
- o extending the tourism season; and
- o helping to fill under-occupied weekend hotel rooms.

#### **Greater Boston Opportunities**

MSM's site in Revere, minutes from Logan International Airport, creates an obvious opportunity to collaborate with MassPort and MOTT to promote to airport travelers not only the culture, dining, education, sports, conferences and recreation that the Greater Boston area offers, but to package a world class, convenient gaming opportunity along with such attributes. MSM is but seven-minutes from the airport by car, and only five minutes on the MBTA. We anticipate that promotional collaboration with both MOTT and MassPort will increase the passenger demand

from the 76 non-stop originating locations in the United States. We have already begun discussions with MassPort on these. Furthermore, through our existing junket base and through expansion efforts of that base, we see the opportunity to work with these agencies to seek new originating locations both domestically and internationally. Our strong junket operations in the mid-Atlantic region would seem, for example, to coincide with the increasing travel trend at Logan.

Having met with a variety of the Greater Boston stakeholders, we have identified a number of areas to explore further collaboration:

- o Through an increased focus on the leisure tourism market and to work with MOTT;
- o To assist in establishing a unified goal for messaging and promoting Boston through the vision of MOTT, MassPort and other stakeholders;
- o To pursue strategies that would enhance and extend the business traveler experience in the Greater Boston region;
- o To craft with stakeholders packages and offerings that would incentivize the overall travel market in a way that would appeal to a variety of travelers who base their travel decisions in part on sports, cultural, dining and education-related attractions;
- o As a part of its ground shuttle program, MSM will retain a vendor to operate shuttles between MSM and area businesses and business districts, key transportation hubs, area tourism and cultural attractions, and other entertainment venues;
- o To participate as an active member of the GBCVB and to demonstrate commitment through active board member participation; and
- o To adopt a formal understanding with the GBCVB and MCCA that seeks to create a balanced partnership.

With the national tourism trend growing, this kind of collaboration with a destination resort casino, arguably unique to Boston more so than any other city in America (notwithstanding gaming-centric Las Vegas), can help to maintain a balanced approach in all market segments and will guard against the risks of over-reliance in any one sector; and our destination resort will offer integration, rather than separation, from the community and surrounding region through such collaboration. The Mohegan Sun partnership points program, for example, is one of the strongest and most robust in the gaming industry because it invites participation in points earned to be redeemed throughout the local community. We have already generated documented interest in our points program from over 60 businesses and we intend to partner with many more.

Additionally, MSM is forming partnerships with area hotels, restaurants and attractions as well as the GBCVB to allow clients to understand and enjoy the entire region. Such a strategy promotes a greater appreciation for surrounding attractions and encourages repeat visitation.

### **North Shore Opportunities**

We also see great opportunities to partner with organizations and communities on the North Shore and we look forward to acting as a bridge for tourism on the North Shore. We have already had extensive discussions with the North of Boston Convention and Visitors Bureau and the North Shore Alliance for Economic Development on ways to promote North Shore cultural institutions. For example, we have discussed with Salem Mayor Kim Driscoll ways we can work with the City of Salem to cross-market its annual Halloween celebrations every October.

### **3-27 INTERNATIONAL MARKETING EFFORTS**

. Mohegan Sun Massachusetts (MSM), with its site so close to Logan Airport, will complement the region's reputation and existing attractions to compete for these international visitors. The existing Mohegan Sun junket representation for international customers will assist in strengthening the base that Massachusetts Office of Travel and Tourism (MOTT), for example, has already established in locations like Canada. Our collaboration with MOTT and the Massachusetts Port Authority will rely on our Connecticut resort experience where we have served international clientele for almost two decades. We will help create and pursue high profile events that draw international crowds; market to international visitors who may visit Boston because of its higher education institutions; support marketing campaigns targeted at international markets; and we will make the Greater Boston area the international destination of choice for visitors seeking a gaming and city experience. These programmatic initiatives will result in enhanced attendance and revenue from out-of-market patrons beyond the "base" case detailed in the PKF market study.

### **4-22 DIVERSIFIED REGIONAL TOURISM**

Mohegan Sun Massachusetts (MSM) will complement the existing regional tourism industry by creating a highly desirable destination experience for the people of the Commonwealth, as well as with out-of-state and international visitors. Unique and appealing brands in dining options ranging from the fast and casual to gourmet, as well as exciting retail brands will be found throughout the 185,000 square feet of complementary public space of the destination resort. While we know the unique nature of our product offering will be a draw in itself, we will establish relationships with area hotel, restaurant, retail and entertainment businesses, and convention and tourism entities, to create a cross marketing initiative that will provide a bridge between MSM and the existing regional tourism industry and provide a diverse tourism menu for visitors to MSM and the Greater Boston Area

## **MARKET CAPTURE**

### **2-26 MARKET ANALYSIS**

There are three primary components of Mohegan Sun Massachusetts' (MSM) plan to recapture Massachusetts and out of state customers: (1) MSM will have significant non-gaming amenities



such as retail, dining, entertainment and hotel, which are extremely important to attract and retain customers; (2) Mohegan Sun's database of five million customers, many of them in the Northeast, will result in a speedy ramp-up of revenues; and (3) the convenience associated with approximately three million adults living within a sixty-minute drive of MSM and its unique location adjacent to an MBTA mass transit stop.

### **2-34 MARKETING PLAN**

We will execute this strategy in two phases: (1) pre-opening and opening; and (2) ongoing and sustaining. Mohegan Sun's preopening and opening strategy and tactics will be founded in a massive database that numbers more than five million accounts, hundreds of thousands of which are in the Commonwealth and millions of which are in New England. Mohegan Sun has serviced this region for the last two decades; we have learned from and created for the patrons who will visit our resort. We will leverage our New England know-how to build this destination. **(Confidential Attachment)**

### **2-37 MARKETING TO IN-STATE VISITORS**

Our marketing plan for in-state residents will utilize newspaper, radio and television advertising as well as a direct mail program in which we market to customers with offers that are tailored to both their preferences and value. For example, a slot customer who spends most of their promotional points on retail is more likely to get promotional material like free slot play and retail coupons to spend at the destination resort. Promotions will be similarly targeted based on each customer's past gaming activity and location (e.g. the further a customer is, the higher the offer might be). Proximity to other gaming establishments will also play a factor in promotional offers because asking a patron to drive past a more convenient gaming establishment usually requires an offer above what that customer might be accustomed to. Our marketing plan anticipates the use of junkets for both in-state and out-of-state customers.

### **4-21 TOURISM DIVERSITY**

While Mohegan Sun Massachusetts (MSM) will offer an unparalleled destination resort casino experience, it is recognized that the Greater Boston region offers many assets that are just steps beyond our front door.

The Mohegan Sun Points Partnership is an example of commitment to supporting the regional tourism outreach efforts, In addition Mohegan Sun will work closely with area hotels, and the Massachusetts Coalition for Performing Arts and The Citi Center to collaborate efforts for increased tourism interests to our visitors. Mohegan Sun is also committed to working with charter tour bus operators to create domestic line runs to get visitors to Mohegan Sun daily

## **WORKING WITH LOCAL BUSINESSES**

### **1-03 OUTWARD LOOKING**

Mohegan Sun Massachusetts (MSM) – through its physical design, ease of access, business operations and relationship with the Greater Boston region – will be a destination resort that

faces outward and fully engages our host community of Revere and the surrounding area. It will be of and for its specific place, taking advantage of the many opportunities of its setting, including the nearby racetrack at Suffolk Downs and MBTA Blue Line station, the splendid ocean views and access of Revere Beach, the talented and diverse local workforce and nearby recreational and entertainment venues. The building itself will accomplish three key goals: embracing gracefully its setting; meeting the highest standards of sustainable design that expresses its function; and invoking the sense of novelty and escape that is expected of a destination resort. While MSM will offer an unparalleled destination resort casino experience, we also recognize that the Greater Boston region offers many attractions that are just steps beyond our front door. We are taking advantage of that geographic proximity by developing strong relationships with local attractions and encouraging our visitors not just to experience MSM but also to extend their stay and sample everything the region has to offer.

### **3-14 LOCAL BUSINESS PROMOTION**

Mohegan Sun Massachusetts (MSM) is uniquely dedicated to promoting local businesses in our host and surrounding communities. MSM's Host Community Agreement (HCA) with the City of Revere requires MSM to use best efforts to purchase not less than \$10 million in goods and services from vendors with a principal place of business in Revere. Both purchasing commitments will place a particular emphasis on utilizing minority, veteran and women-owned business enterprises, which is highly valued by both our partners in our diverse host and surrounding communities and our own corporate principles. Moreover, MSM will offer a unique Regional Business Partnership Program that extends both our brand and benefits to local and regional retailers. In a matter of weeks, more than 60 local retailers from the region have expressed interest in participating in the program, we anticipate that this number will only grow. Given that tens of millions of dollars is currently circulating within this program, participation of these affiliated retailers will broaden the options where guests can utilize their points and bring new customers to these local businesses

### **3-15 LOCAL SUPPLIERS**

Mohegan Sun Massachusetts (MSM) is committed to the inclusion of local suppliers in the construction and FFE portions of our projects. Under the Host Community Agreement (HCA) with the City of Revere, MSM has committed that at least 10% of the total employee worker hours in each trade will be by Revere residents. , respectively. Together with our construction manager and the building trades council, we will first focus on effective and comprehensive outreach to Massachusetts businesses. We will next develop a qualified list of Massachusetts based trade contractors and suppliers from which we will solicit construction bids. We will work diligently to source specific portions of the work to local small, women and minority business enterprises. We are also committed to identifying and working with local, regional and minority vendors in all aspects of construction project and operations

### **3-16 LOCAL BUSINESS OWNERS**

Mohegan Sun Massachusetts (MSM) is committed to working with local business owners to provide goods and services for the destination resort. Our Host Community Agreement specifically requires MSM to use best efforts to purchase \$10 million dollars in goods and services from vendors and companies with a principal place of business in Revere. Mohegan Sun has a long history of developing partnerships with vendors in our host communities and we are proud of the relationships that we have developed around our Connecticut and Pennsylvania operations. Our philosophy of buying local has translated into more than \$500 million spent annually in goods and services from local vendors near our Connecticut and Pennsylvania resort casinos, a philosophy we intend to replicate here in Massachusetts. This philosophy includes developing a vendor database, community outreach with a significant number of events to meet business owners and outreach to chambers of commerce and other area business organizations.

### **3-18 PROMOTING REGIONAL BUSINESSES**

Mohegan Sun Massachusetts (MSM) understands the importance of supporting businesses regionally, and that is one of the reasons that we have agreed to a regional goal for economic development in our Host Community Agreement (HCA) with the City of Revere. Our confidence in our ability to promote regional businesses comes from Mohegan Sun's success in accomplishing this in both Pennsylvania and Connecticut where we have spent nearly \$500 million annually in goods and services from local vendors surrounding our facilities in those states. Likewise, unlike our competitors, because of the proximity of our Connecticut facility, we already have a variety of significant relationships with Massachusetts businesses, which we will work with at MSM, and which will also help serve us as ambassadors and verifiers with other Massachusetts businesses.

### **3-19 VENDOR SUPPLIED**

Preliminary spending estimates show that the Mohegan Sun Massachusetts (MSM) destination resort will make expenditures for a wide variety of goods and services totaling more than \$100 million annually. The list of products and services is extensive and will reflect the region's attributes. Our restaurants will seek local meats and New England seafood, regional produce, linens and supplies. Our retail operations will pursue clothing, jewelry, electronics, women's shoes and accessories; it will include newspapers, sundries, books and magazines. MSM will require tens of millions of dollars in supplies and services such as paper products, copiers, computers, landscaping and legal services. As stated elsewhere in this application and in our host agreement, MSM will be making best efforts to keep these purchases regional and local and to provide significant representation from the minority, veteran and women's enterprises.

#### **3-19-01**

**Mohegan Sun Massachusetts**

\$ in Thousands Cost of Goods - Retail Cost of Goods - F&B Cost of Goods - Casino Related Operating Exp. and Supplies Outside Services Promo / Direct Marketing Expense Rent Expense Repairs and Maintenance Special Events and Promotions Other Misc. Total	Rough Estimates for Line items Involving Vendor Purchasing				
	Year 1	Year 2	Year 3	Year 4	Year 5
	17,100	17,955	18,494	18,864	19,241
	27,173	28,510	29,438	30,026	30,627
	1,725	1,794	1,904	1,942	1,981
	9,342	9,624	9,914	10,113	10,316
	10,000	10,200	10,404	10,612	10,824
	10,724	11,048	11,380	11,608	11,840
	18,961	18,961	18,961	18,961	14,940
	2,500	2,550	2,601	2,653	2,706
	5,147	5,303	5,462	5,572	5,683
	1,817	1,827	1,843	1,849	1,855
	104,489	107,772	110,401	112,199	110,014

**3-24 LOCAL AGREEMENTS**

Mohegan Sun Massachusetts (MSM) understands that the success of the tourism industry is a critical part of the regional economy and lifestyle, and it is committed to partnering with local tourism entities and business organizations. More than 60 local businesses have expressed a documented interest in becoming part of the Mohegan Sun Points Partnership Program. MSM will be a complement to the Eastern Massachusetts tourist experience and, accordingly, the Greater Boston Convention and Visitors Bureau has agreed to partner with MSM. In addition, we expect to enter into agreements with the Massachusetts Convention Center Authority regarding the Boston Convention and Exhibition Center and the Hynes Convention Center. We have also begun discussions with Massachusetts Port Authority concerning the increased demand at Logan Airport and enhancing international tourism. MSM’s Host Community Agreement (HCA) with the City of Revere requires MSM to use best efforts to purchase not less than \$10 million in goods and services from vendors with a principal place of business in Revere. The HCA also requires MSM to use best efforts to purchase not less than \$50 million in goods and services from vendors with a principal place of business within a 15-mile radius of Revere City Hall

**3-25 CROSS MARKETING**

The size and the unique and extraordinary offerings of the Mohegan Sun Massachusetts (MSM) destination will draw inquiries from visitors inside and outside of the region. This effect places MSM in the position to espouse the many attributes of Eastern Massachusetts, including the North Shore, and to make regional tourism more prominent. MSM has developed a cross-marketing plan to take advantage of this important opportunity. This plan includes the Mohegan Sun Points Partnership Program; a Ground Shuttle Program; Persona Communication/Employee Training; Online Regional Reservations; Online Regional Marketing/Advertising initiatives; Direct Mail; and Virtual Concierge Kiosks

Using our plan, we have begun efforts to cross-market with specific institutions. Our Impacted Live Entertainment Venue Agreement specifically requires both MSM and the CitiCenter to

cross-market each other's institutions. We have had cross-marketing partnership discussions with the Greater Boston Convention and Visitors Bureau and the Massachusetts Convention Center Authority. We also have had similar discussions with organizations on the North Shore like the North of Boston Convention and Visitor's Bureau and the North Shore Alliance for Economic Development. In addition, we have signed up more than 60 small businesses near Revere in our points program and our Host Community Agreement specifically requires us to cross-market with businesses locally and throughout the region

### **3-30 REGIONAL ECONOMIC PLAN COORDINATION**

Mohegan Sun Massachusetts (MSM) will be consistent with the planning goals of the City of Revere, as evidenced by the zoning for the site and the City of Revere FY 2010-2015 Strategic Plan. Since 1996, Revere has anticipated and planned for the development of all or a portion of the MSM site for expanded gaming. On December 9, 2013, following unanimous recommendation of the Revere Planning Board, the Revere City Council affirmed this objective by voting unanimously for a zoning amendment intended to facilitate the as-of-right development of the MSM project and by adopting a separate Council Order entitled, "A Resolution Affirming Support for a Gaming Establishment Located off of Winthrop Avenue." As noted in the Certificate on the Draft Environmental Impact Report, DEIR, for the Project, the DEIR demonstrated consistency with Executive Order 384, the Commonwealth's Sustainable Development Principles, the City of Revere FY 2010-2015 Strategic Plan, and the Boston Regional Metropolitan Planning Organization Journey to 2030 Plan. Specifically, the Certificate noted that "The project is generally consistent with the economic development and job creation goals of these plans, as well as the placement of projects within access to transit locations, and the implementation of sustainable design measures."

### **4-14 SERVING THE SURROUNDING COMMUNITY**

Mohegan Sun Massachusetts (MSM) will be a premier full-service destination resort through which our hospitality team, products and our amenities will serve as benchmarks and catalysts for growth in the entire eastern Massachusetts area. Additionally, our non-gaming amenities will complement the culture that already exists in the region, eliciting interest and attracting visitors from our surrounding community

### **4-33 STIMULATING RETAIL ACTIVITY**

To date, MSM has affiliated with over 60 local retailers from Revere to Lynn who have expressed interest in accepting "Mohegan Sun Momentum Points" as currency to be used in their retail establishments. Given that tens of millions of dollars is currently circulating within this program, these affiliated retailers will broaden the options where guests can utilize their points.

The 40 acre campus uniquely integrated into Revere’s long history of beachfront leisure and sports minded action with and surrounding communities as local destinations worthy of additional entertainment for guests. Much like the Mohegan Sun property in Connecticut, this resort will invite guests to stay for multiple days and allow for easy trips to area attractions and the many arts and music festivals that take place from Boston to Salem to Cambridge and beyond

#### **4-33-01 STIMULATING RETAIL ACTIVITY**

##### **Stimulating Retail Activity**

Mohegan Sun Massachusetts (MSM) will create a highly desirable destination experience for residents of the Commonwealth, out-of-state guests and international visitors and its accessibility will drive more visitation and higher revenue for the Commonwealth.

To date, MSM has affiliated with over 60 local retailers from Revere to Lynn who have expressed interest in accepting “Mohegan Sun Momentum Points” as currency to be used in their retail establishments. Given that tens of millions of dollars is currently circulating within this program, these affiliated retailers will broaden the options where guests can utilize their points. Attachments 4-33-02 and 4-33-03 provide additional detail regarding this program.

The 40 acre campus uniquely integrated into Revere’s long history of beachfront leisure and sports minded action with views of the waterscape and the beach on one side and the excitement of racing on the other – and beyond the property, MSM will market the amenities of Revere and surrounding communities as local destinations worthy of additional entertainment for guests. Much like the Mohegan Sun property in Connecticut, this resort will invite guests to stay for multiple days and allow for easy day trips to area attractions and the many arts and music festivals that take place from Boston to Salem to Cambridge and beyond.

MSM has introduced a new marketing program that will directly benefit local businesses and tourist attractions throughout the Eastern Massachusetts region.

The MSM Points Partnership Program will enable guests to receive additional discount and redemption opportunities at participating local businesses and destinations in Eastern Massachusetts. MSM anticipates generating tens of millions of dollars of rewards points which will be available annually for redemption at participating partners.

While virtually every casino operator has a player’s club card program, rewards are typically only redeemable at the retail, hotel, food and beverage outlets located within the resort. This program will cut participating local businesses in on the exciting action at MSM while giving guests new options for redeeming their Momentum Rewards points and assisting area businesses.

MSM will be a true regional destination and a true partner with local business. This unique marketing program will enable us to further promote tourism and economic growth throughout Eastern Massachusetts and directly drive business into the region.

Mohegan Sun has a long history of developing valuable partnerships with local businesses and tourist destinations in the regions where it operates. Under this business partnership model, MSM guests will be able to use Momentum Rewards as a cash equivalent at participating regional establishments to encourage additional patronage. Most any retail business that deals in goods and services is eligible to participate.

Joint promotional opportunities will also be available, such as the inclusion of participating businesses in MSM advertising campaigns. This includes direct mail, print and broadcast advertising, and onsite advertising to provide additional marketing and awareness for regional businesses and attractions. Employee discounts will also be available.

## **HIRING**

### **3-02 EMPLOYEES**

Mohegan Sun offers competitive benefits for all full-time positions, including health, dental, vision, paid time off, 401K and tuition reimbursement among others. In addition, we have a world class, friendly culture that recognizes the efforts of our employees in a multitude of different ways. At Mohegan Sun, our team is the reason we are the most successful and well-known gaming brand in New England, and we make sure that they know it.

### **3-06 PLAN FOR WORKFORCE DEVELOPMENT**

Mohegan Sun Massachusetts (MSM) has entered into a Host Community Agreement with the City of Revere (HCA) ensuring the City and its surrounding communities are provided preference in hiring, training and promotion. MSM has agreed to make best efforts to use the existing labor force in Revere and from within a 15 mile radius when hiring for new jobs.

Furthermore, as stated in the HCA, and, consistent with G.L. c. 23K, we have committed to reaching agreements with organized labor groups, as well as ensuring that the workplace is free of workplace harassment and/or discrimination.

Finally, Mohegan Sun has experience hiring in new gaming markets, and we hire in a way that is substantively different from other prospective gaming companies in the Commonwealth. We focus less on an applicant's technical skills and more on their interpersonal skills and ability to provide outstanding guest service. This method opens up opportunity to many who otherwise may not have thought to apply

### **3-06-01 PLAN FOR WORKFORCE DEVELOPMENT**

Mohegan Sun Massachusetts (MSM) negotiated a Host Community Agreement (HCA) with the City of Revere, included here as Attachment 3-06-02, which will provide not only residents of Revere but of the Greater Boston region with the benefit of new jobs and career opportunities. Items excerpted below from the HCA were agreed upon and will be a part of the MSM experience;

### Recital

9. The Parties acknowledge the Project will result in at least 2,500 construction jobs and approximately 4,000 permanent jobs.

1. Construction Employment. The Developer shall ensure that its general contractor or construction manager for the Project and those engaged by said general contractor or construction manager, on a craft-by-craft basis, shall use best efforts to meet the following goals:

(a) at least ten percent (10%) of the total employee worker hours in each trade shall be by bona fide residents of the City;

(b) at least twenty five percent (25%) of the total employee worker hours in each trade shall be by minorities; and

(c) at least ten percent (10%) of the total employee worker hours in each trade shall be by women.

2. Permanent Employment.

(a) The Developer shall use best efforts to ensure that at least twenty percent (20%) of the total permanent workforce for the Project shall be bona fide City residents.

(b) The Developer shall use best efforts to ensure that at least seventy-five percent (75%) of the total permanent workforce for the Project shall be individuals who reside within a fifteen (15) mile radius of Revere City Hall, 281 Broadway, Revere, Massachusetts 02151.

(c) The Developer's workforce shall be unionized and organized in accordance with Section 18(18) of Chapter 23K.

(d) The Developer shall provide a hiring preference for current and former Suffolk Downs Racetrack employees in accordance with the spirit of Section 90 of Chapter 194 of the Acts of 2011.

(e) Throughout the Term of this Agreement, the Developer shall employ one or more full-time



employees to promote awareness of employment and business opportunities at the Project for City residents and businesses, including, without limitation, the job opportunities and local business, purchasing and economic development initiatives set forth in this Agreement, as well as to undertake outreach to neighborhood groups in the City.

(f) The Developer agrees to comply with the job creation and employment commitments listed in the attached Exhibit E [see below].

(g) The Parties acknowledge that the Project is an important public policy initiative that requires the involvement of the entire community and adjoining communities. In that regard, the Developer shall work with the City to devise a plan to hold a jobs fair to promote the opportunities at the facility and shall work with the City to devise a network of training and recruitment partners. The Developer shall work with the City and other communities in the vicinity of the Project to encourage expansion of access to employment for minorities, women and veterans and other disadvantaged groups and generally to expand local employment opportunities. The Developer shall establish a protocol which shall be submitted to the City annually to define and assess these employment and other opportunities for City residents.

(h) The Developer shall meet annually with the City's Mayor to monitor and assess the Developer's progress in implementing the objectives listed in Section 2.E.2.

### **Exhibit E**

#### **The Developer's Quality Job Creation and Employment Commitments**

The Developer shall impose a local hiring program for both construction and permanent jobs at the Project that will include the following components:

##### Construction Jobs:

- Host and maintain a central job bank website (in English and Spanish) as a micro-site within the larger Project website.
- The Developer shall demonstrate to the City its efforts to provide construction employment opportunities to City residents.
- The Developer will utilize best efforts to use the existing labor force in the Commonwealth, and in particular the existing labor force in the City, when hiring for new construction jobs, as required by Chapter 23K.
- In furtherance of specific goals for the utilization of minorities, women and veterans on construction jobs, the Developer shall send to each labor union or representative of workers with which the Developer has a collective bargaining agreement or other contract or

understanding, a notice advising the labor union or workers' representative of the Developer's commitments, as required by Chapter 23K.

Permanent Jobs:

- Establish, fund and maintain human resource hiring and training practices that promote the development of a skilled and diverse workforce and access to promotion opportunities through a workforce training program that: (i) establishes transparent career paths with measurable criteria within the gaming establishment that lead to increased responsibility and higher pay grades that are designed to allow employees to pursue career advancement and promotion; (ii) provides employee access to additional resources, such as tuition reimbursement or stipend policies, to enable employees to acquire the education or job training needed to advance career paths based on increased responsibility and pay grades; and (iii) establishes a program or partnership to provide off-site child day-care, all as required by Chapter 23K.
- Host and maintain a central job bank website (in English and Spanish) as a micro-site within the larger Project website.
- The Developer will provide City residents with advance notice of hiring activities by publishing announcements in local newspapers approximately four (4) to eight (8) consecutive weeks prior to initial hirings.
- Residents of the City and all our surrounding communities (as defined in Chapter 23K)) will be given first priority to apply for jobs during a specified "advance period," such advance period to be established jointly by the Developer and the City.
- Written flyers in English and Spanish will be distributed to local community-based organizations in the City and surrounding communities to inform people about local advance period hiring and the Developer shall use best efforts to otherwise notify residents in the low income neighborhoods in the City proximate to the Project of potential job opportunities.
- The Developer will maintain a minimum of two (2) computers on-site to ensure that residents without computers can research and apply online for jobs at the Project.
- During the Term of this Agreement, the Developer will hold job fairs at the Property to make City residents aware of job opportunities available at the Project.
- The Developer will utilize best efforts to use the existing labor force in the Commonwealth including those workers described in Chapter 194 of the Acts of 2011, Section 90 as it relates to the former employees at Wonderland Park, See Attached \_\_\_\_\_, and in particular the existing labor force in the City, when hiring for new jobs, as required by Chapter 23K.

- The Developer will make best efforts to ensure that twenty percent (20%) permanent employees at the Project are City residents and 75% of part-time employees reside within fifteen (15) miles, as more particularly set forth in the Agreement.
- In furtherance of specific goals for the utilization of minorities, women and veterans permanent jobs, the Developer shall send to each labor union or representative of workers with which the Developer has a collective bargaining agreement or other contract or understanding, a notice advising the labor union or workers' representative of the Developer's commitments.
- During the Term of this Agreement, the Developer shall use best efforts to work with the City's schools to establish school to work programs for hospitality jobs.
- During the Term of this Agreement, the Developer shall support the efforts of and actively engage with the Commission and community colleges to develop the Massachusetts Community College Workforce Training Institute and Massachusetts Casino Careers Training Institute at community colleges in the Commonwealth.
- During the Term of this Agreement, upon request by the City, the Developer shall provide the Community Advisory Board with information regarding its contracts with organized labor, including hospitality services, the number of employees employed at the gaming establishment, including detailed information on the pay rate and benefits for employees and contractors, and the Developer's plans to ensure labor harmony during all phases of the construction, reconstruction, renovation, development and operation of the gaming establishment.
- Consistent with the corporate policy of the Developer to provide equal opportunity for all applicants and employees, the Developer will not discriminate on the basis of race, color, religion, sex, national origin, age, disability, sexual orientation, gender identity or expression, or veteran status. This policy applies to all areas of employment including recruitment, hiring, training, promotion, compensation, benefits, transfers and social and recreational programs.

The Developer shall implement a training and development program for permanent jobs at the Project that will include the following components:

- Provide opportunities for team members to pursue personal and professional growth, to enjoy satisfying careers, to participate in training and development programs and to celebrate success including rewards and recognition for superior performance against measurable goals.
- Provide new employees with learning programs, as well as specialized training courses

customized to meet employee learning needs.

If a position requires serving alcoholic beverages, authorizing complimentary alcoholic beverages, or managing a food and beverage operation, that employee must obtain an alcohol awareness certification card. All table games employees, valet attendants, limo drivers and security team members must also possess this certification.

Provide an educational assistance program that reimburses employees ninety percent (90%) of tuition costs up to a maximum of Three Thousand Dollars (\$3,000) per year for pre-approved undergraduate classes or up to a maximum of Four Thousand Dollars (\$4,000) per year for pre-approved graduate study at an accredited college or university.

Provide regulatory and compliance training.

Implement a code of commitment to employees.

### **3-10 ORGANIZED LABOR CONTRACTS**

Mohegan Sun Massachusetts (MSM) has met with and received unprecedented and unparalleled support by a large number of unions in the cities of Revere and Boston. In a very short time we have finalized a form of Project Labor Agreement with the Building and Construction Trades Council of the Metropolitan District as well as the New England Regional Council of Carpenters. We have also executed a signed Memorandum of Agreement with the International Brothers of Electrical Workers, United Auto Workers, Teamsters and LIUNA that also represents the interest of an additional five unions. Further illustrating the support MSM has received from labor are letters of support and endorsement received from the Teamsters, Building and Construction Trades, Sheet Metal Workers, United Food and Commercial Workers, International Brotherhood of Electrical Workers, Laborers Local 22, Boston Labor Council and the Carpenters.

### **3-11 LABOR HARMONY**

Mohegan Sun Massachusetts (MSM) has met with and received unprecedented and unparalleled support by a large number of unions in the cities of Revere and Boston. In a very short time we have finalized a form of Project Labor Agreement with the Building and Construction Trades Council of the Metropolitan District as well as the New England Regional Council of Carpenters. We have also executed a signed Memorandum of Agreement with the International Brothers of Electrical Workers, United Auto Workers, Teamsters and LIUNA that also represents the interest of an additional five unions. Further illustrating the support MSM has received from labor are letters of support and endorsement received from the Teamsters, Building and Construction Trades, Sheet Metal Workers, United Food and Commercial Workers, International Brotherhood of Electrical Workers, Laborers Local 22, Boston Labor Council and the Carpenters.

### **3-12 EMPLOYEE RETENTION RECORD**

Mohegan Sun prides itself on the quality of the job applicants we attract, the quality of team members we employ, and our ability to retain our employees. Statistics from the 2013 East Region Hospitality Comp Data Survey show that year-to-year turnover within hospitality companies throughout the Northeast was approximately 40.4%. Comparatively, Mohegan Sun properties in Connecticut and Pennsylvania showed turnover of 4.69% and 23% respectively. In a recent Employee Opinion Survey carried out by independent group, Sterling Research Group LLC, 94.1% of Mohegan Sun employees responded that they enjoy their job. We pride ourselves on developing a culture that encourages personal growth, career development, promotion and overall satisfaction every day. Transfer and promotion opportunities are the priority to keep our team members engaged and motivated within our organization. We believe that we have created a company where our employees do not just find a job, they find a career.

### **3-13 ETHNIC DIVERSITY**

Mohegan Sun is a minority-owned business that is governed by a 100% minority Tribal Council. Accordingly, we take great pride in our commitment to having and promoting ethnic diversity and our record of doing so in Connecticut and Pennsylvania is outstanding. Although our Connecticut and Pennsylvania facilities are located in areas that are not as diverse as the Greater Boston region, nearly 41% of our employees are non-white and we have an almost equal representation of female to male employees. We have already adopted a diversity plan and statement for Mohegan Sun Massachusetts (MSM) that is similar to the diversity plans we used in Pennsylvania and Connecticut. This plan includes a commitment to hiring and promoting the most qualified persons into available positions at MSM. We provide all applicants and employees with equal opportunity in recruitment, selection, appointment, promotion, training, delegation, discipline and separation. At MSM, as with our other properties, we will foster a work environment that is fair and impartial in all of its relations with all persons, regardless of race, color, religious creed, age, sex, ancestry, sexual orientation, national origin, AIDS or HIV status or non-job related disability.

## **ECONOMIC IMPACT**

### **COMMISSION SUMMARY OF INNOVATION GROUP REPORT**

***Mohegan Sun Revere***  
**Everett Impact Analysis**  
Exhibit 9 to Response to Petition

This report states that a wealth of evidence exists to contradict the proposition that gaming harms local businesses by permanently substituting for other expenditures. The report cites three factors which suggest that the casino project will benefit local businesses:

- Casino visitors stopping at local retail outlets (mostly gas stations) for goods and to some extent restaurants, and long-distance patrons staying at area hotels; even in markets with casino hotels, non-casino hotels enjoy boosts in occupancy.
- The influx of casino employees will generate demand at local businesses, an effect that can be enhanced when casinos implement bonus or discount programs with their employees to encourage use of local businesses.
- Purchases by the casino for goods and services from small local businesses will provide increased demand and income for these small local businesses.

The report points to several research studies and statistics to support its claim that casinos are good for local businesses, including food and beverage establishments:

- Research by Kathryn Hashimoto and George Fenich found that local restaurants tended to thrive after a casino opened nearby. They noted, "When casinos are developed, all aspects of the local food and beverage business increase." The researchers also found that casinos opening in Atlantic City reversed a downward trend in local business, and that the reason local restaurant owners opposed casinos was not because their business would be hurt but because the competition would force them to offer better wages and benefits for employees.
- Research by the Federal Reserve Bank of St. Louis indicates that the evidence on the impact of casinos on local businesses is "generally positive."
- Research by Nancy Reeves and Associates on the impact of the *Grand Casino Mille Lacs* and *Grand Casino Hinckley* concluded that, "With the opening of *Grand Casino Hinckley* in 1992, the hospitality business in Hinckley was transformed from a rest stop for travelers to a tourist destination. In addition to the casino complex, with its 1,275 jobs, Hinckley has added 11 new businesses and expanded 4 more since 1992, adding 87 new jobs."
- Authors of a 2004 study by the Center for Policy Analysis, University of Massachusetts Dartmouth, stated that "the net economic welfare benefit [of riverboat gaming in Biloxi/Gulfport, Mississippi] is better quality, wider selection, increased overall sales and employment in eating and drinking establishments."
- Economists at the University of Missouri and Washington University concluded that casino gambling in Missouri had a net positive annual impact on Missouri output.
- Penn State University economist Adam Rose has stated that "the preponderance of empirical studies indicate claims of the complete 'cannibalization' of preexisting local

restaurants and entertainment facilities by a mere shift in resident spending is grossly exaggerated.”

The report also presents six case studies supporting such assertions

The report notes that an employee discount program developed in partnership with local businesses can have the following benefits:

- Supports local merchants and retailers by encouraging employees to patronize them
- Serves as a benefit to casino employees that increases their loyalty to the casino
- Can result in casino employees recommending local businesses to casino patrons
- Can increase employee spending at local businesses by 144% (see full report for details on assumptions underlying this estimate)

The report concludes with recommended steps that the casino developer and the local community can take in order to create maximum value for the host community.

### **2-18 REVENUE GENERATION**

Mohegan Sun Massachusetts' (MSM) projection for estimated municipal and state tax revenues to be generated by the destination resort casino (collectively) is \$1.64 billion in the first five years of operation

### **3-01 STUDIES AND REPORTS**

We have provided three independent studies to support our response to this question. The studies include:

- Economic & Fiscal Impacts of the Proposed Mohegan Sun Massachusetts (MSM) destination resort casino – a detailed estimation of the potential Economic and Fiscal (tax) impacts attributable to the proposed MSM destination resort. The study presents the significant amount of one-time and ongoing economic impacts offered by MSM and outlines the fiscal impact generated by such economic impacts.
- Impact on Entertainment Venues, the Arts and Cultural Institutions – a review of the impact that a destination resort casino can have on local cultural institutions and entertainment venues. The study outlines the various steps that can ensure that local cultural institutions benefit from the introduction of a resort such as MSM.
- Impact on Small and Local Businesses – a review of the impact that a destination resort casino has on local businesses. The study provides various best practice recommendations to enable the creation of maximum value for the host community

### **3-21 PROJECTED BENEFIT FOR REGIONAL BUSINESSES**

**3-21-01 PROJECTED BENEFIT FOR REGIONAL BUSINESSES**

Pursuant to the market study completed by PKF Consulting and dated December 18, 2013, provided as Attachment 3-21-02, Accordingly, the study found that approximately \$290 million would be spent at regional businesses during the first five years of operations (refer to Figure 3-21a below).

	Operational Year - Average Case ("Base Case")					
	Year 1	Year 2	Year 3	Year 4	Year 5	TOTAL
# of Patron Trips	7,802,863	7,880,892	7,959,701	8,039,298	8,119,691	39,802,443
Capture Rate to Spend at Local Businesses	35.00%	35.00%	35.00%	35.00%	35.00%	
Average Spend	\$ 20.00	\$ 20.40	\$ 20.81	\$ 21.22	\$ 21.65	
Total Estimate Spend at Regional Businesses	\$ 54,620,041	\$ 56,269,566	\$ 57,968,907	\$ 59,719,568	\$ 61,523,099	\$ 290,101,182

*Figure 3-21a - Average Case / "Base Case" Spend at Regional Businesses*

Best Case and Worst Case scenarios (providing a 30% premium or 25% reduction on the Average / Base Case scenario respectively) are presented in Figures 3-21b and 3-21c. The range for regional spend based on these scenarios is \$217 million to 377 million in the first five years of operations.

	Operational Year - Average Case ("Base Case")					
	Year 1	Year 2	Year 3	Year 4	Year 5	TOTAL
# of Patron Trips	10,143,722	10,245,159	10,347,611	10,451,087	10,555,598	51,743,176
Capture Rate to Spend at Local Businesses	35.00%	35.00%	35.00%	35.00%	35.00%	
Average Spend	\$ 20.00	\$ 20.40	\$ 20.81	\$ 21.22	\$ 21.65	
Total Estimate Spend at Regional Businesses	\$ 71,006,053	\$ 73,150,436	\$ 75,359,579	\$ 77,635,439	\$ 79,980,029	\$ 377,131,536

*Figure 3-21b - Best Case / "Upside Case" Spend at Regional Businesses*

**3-21-02 MARKET STUDY**

**Introduction**

PKF Consulting was retained to conduct research and prepare estimates of gaming revenue for the Mohegan Sun Massachusetts casino resort ("the Casino" or "the Resort") proposed for development on a site at Suffolk Downs Racetrack in Revere, Suffolk County, Massachusetts. It has been assumed that the Resort will open on January 1, 2016.

Based on the preliminary master plan for the project, the following uses/facilities have been assumed for the Resort:



- A casino (“the Casino”) with approximately 4,000 slot machines, 100 table games and 20 poker tables (4,720 gaming positions). The Casino will be de-signed to enable expansion to 5,000 gaming positions.
- Two attached hotels totaling between 500 and 550 rooms.
- Approximately 100,000 to 150,000 square feet of purpose-built dining, lounge, entertainment and retail space (“RDE”).
- A spa of 10,000 square feet.
- Adequate structured and surface parking, with valet service offered.
- The Mohegan Sun Player’s Club frequent player program.

The casino and casino hotel will be operated by MGA Gaming MA, LLC (MGA). The RDE and second hotel will be integrated with the casino facility and will be operated by tenants selected by MGA to enhance the overall attraction factor for the casino facility. This new casino entertainment facility would be in competition with a number of existing casino operations in the region and others assumed for development in the Commonwealth of Massachusetts and elsewhere as described herein. In terms of the subject casino resort in Revere competing with Mohegan Sun’s existing resort in Uncasville, Connecticut, Mohegan Sun provided the following position statement:

“The Project’s market standing is both strengthened and at the same time protected through a covenant with majority owner Brigade Capital Management. On one hand, the Project will solicit customers and create its own separate and distinct database; however, that effort is to be supported in an awareness campaign using the existing Mohegan Sun database, which numbers in the millions. The campaign will target existing Mohegan Sun Connecticut database customers and this effort is to be refreshed on a regular basis. Additionally, the covenant prohibits Mohegan Sun Connecticut and its affiliates from marketing to Mohegan Sun Massachusetts customers more aggressively than that which is undertaken by the Massachusetts Project itself. The Brigade agreement calls for a neutral third party review to ensure adherence to these terms and prohibits Mohegan Sun from engaging in any competing business in a specified radius.”

### **Scope of Services**

In completing this assignment, we performed numerous tasks. Specifically, we:

- Discussed the project and its elements with you and obtained information concerning the timing and scope of the project;
- Visited and toured the area around Suffolk Downs;

- Obtained and reviewed historical gaming facility and revenue data for the existing casinos in relevant areas bordering Massachusetts;
- Gathered information concerning the possible development of other gaming facilities in Massachusetts and elsewhere;
- Analyzed historical lodging supply and demand data for selected Massachusetts counties from Smith Travel Research;
- Gathered and analyzed various demographic and economic data for the Boston area;
- Prepared projected levels of gaming revenues for the proposed casino resort; and
- Prepared this report summarizing our findings, conclusions and estimates of gaming revenue.

**SECTION II: MARKET AREA REVIEW**  
**PROPOSED MOHEGAN SUN MASSACHUSETTS**  
**REVERE, SUFFOLK COUNTY, MASSACHUSETTS**  
**DECEMBER 2013**

The purpose of this section is to review pertinent economic and demographic data to determine the current economic climate in the subject market area, its potential for growth and the degree to which it could support the subject casino resort as envisioned.

**AREA OVERVIEW**

Revere and Suffolk Downs, in which the proposed Mohegan Sun Massachusetts casino resort is to be located, are located in Suffolk County. The City of Boston, which is also the state capital of Massachusetts, is located in Suffolk County as well. Neighboring Middlesex and Norfolk Counties and the southern portion of Essex County comprise the other major population concentrations in the Boston area. The following map indicates the relative locations of these four counties and Suffolk Downs in the greater Boston area. Boston is the largest city in New England and is the financial and commercial hub of the region.



The site of the proposed casino resort is adjacent to Suffolk Downs, a thoroughbred racetrack that spans both East Boston and Revere, Massachusetts. The casino will be located in the Revere portion of the racetrack property, as the City of Revere previously passed a referendum approving a casino development. The relationship of the property to downtown Boston and its “close in” suburbs can be seen on the map on the following page.

**3-33 ENTERTAINMENT AND ATHLETIC EVENTS**

Mohegan Sun is one of the most successful presenters of entertainment in the United States. The Mohegan Sun Arena in Connecticut has hosted nearly every “A” list musical act nationally and has developed a reputation for delivering a world-class experience to millions of visitors. We have also distinguished ourselves in the field of sports entertainment through ownership of the Connecticut Sun WNBA professional basketball team and as host to some great professional boxing bouts and mixed martial arts fights. In building Mohegan Sun Massachusetts (MSM), we are respectful of legislation that seeks to protect the great not-for-profit and municipally owned venues of the Commonwealth, particularly those venues in the Greater Boston region such as Citi Center with which we will share a customer base. We have elected to forego a large theater or arena setting and intend to create several smaller spaces to generate excitement instead. Likewise, we hope to partner with neighboring Suffolk Downs racetrack to help boost the racing industry

**4-11 NON-GAMING AMENITIES**

The Shops at Mohegan Sun Massachusetts (MSM) will provide the perfect complement of shopping, dining and entertainment options for this world-class destination resort. The restaurant offerings will include fast casual and fine dining, convenience, coffee, and late night options. The casual dining choices will range from buffet style to sports bars, pizza, and deli. Fine dining offerings are expected to include celebrity chef concepts, steak and seafood, contemporary American and Italian options. Guests will also have both sit-down and on-the-go breakfast options for coffee, pastries, and late-night casual dining choices such as sandwiches, pizza and desserts.

Boston-based developers, New England Development and Finard Properties, will be the retail development team tasked with the responsibility of ensuring that guests that are shopping, dining and enjoying the entertainment are well cared for. By partnering with Mohegan Sun, they will be programing and overseeing the non-gaming amenities, including a second hotel that will be an important part of this project. A world class spa, dazzling clubs and lounges, jewelry stores, and clothing stores will entice the hotel and casino guests to stay that extra day or night. Additional entertainment options such as smaller music venues and high tech arcade options will entertain those looking for fun of another flavor

#### **4-11-01 NON GAMING AMENITIES**

##### **Non-Gaming Amenities**

The Shops at Mohegan Sun Massachusetts (MSM) will provide the perfect complement of shopping, dining and entertainment options for this world-class destination resort. The restaurant offerings will include fast casual and fine dining, convenience, coffee, and late night options. The casual dining choices will range from buffet style to sports bars, pizza, and deli. Fine dining offerings are expected to include celebrity chef concepts, steak and seafood, contemporary American and Italian options. Guests will also have both sit-down and on-the-go breakfast options for coffee, pastry and bagels, and late-night casual dining choices such as sandwiches, salads, pizza and desserts.

Additionally, a world-class spa will be integrated within the surrounds of MSM as well – providing a relaxing and rejuvenating refuge for guests looking to “get away”. We plan to have spa treatment rooms that are internal and subdued, and spa treatment rooms with glass walls open to the outside. We will offer traditional massages, skin and body, and salon treatments. The spa will also offer light therapy, aromatherapy, vitamin infused showers, etc. We will provide a focus on health and wellness, and a focus on meditation and mindfulness. The spa will integrate with F&B menu and with business meeting planning. We will contemplate treatment gardens and roof-top yoga. The spa will be a destination and complement the surrounding amenities.

Boston-based developers, New England Development and Finard Properties, will be the retail development team tasked with the responsibility of ensuring that MSM guests that are shopping,

dining and enjoying the entertainment are well cared for. These two firms have decades of experience creating exciting, world-class retail experiences, which have been part of the New England landscape (and beyond). By partnering with Mohegan Sun, they will be programing and overseeing the non-gaming amenities, including a second hotel, that will be such an important part of the destination resort's offerings. A world class spa and dazzling clubs to entertain those over 21 will entice hotel and casino guests to stay that extra day or night. Additional entertainment options such as smaller music venues and high tech arcade options will entertain those looking for fun of another flavor.

Retail shopping opportunities for guests will include, for men and women, fine apparel & fashion, accessories and jewelry. Specialty shops will offer shopping options such as skin and hair care, travel and gift accessories, fine liquors, chocolates, cigars, intimates and eyewear. New England Development and Finard Properties – in partnership with Mohegan Sun – will provide the ideal balance of dining, shopping, gaming, hospitality, and spectacular entertainment and in doing so, ensure the success of the MSM development. MSM will be home to the newest Mohegan Sun Kids Quest type amenity available. This childcare/adventure center will be a place where kids are physically and mentally engaged. This amenity will allow parents to relax while the kids are in fully secure surroundings engaging in creative play, arts and crafts and many other incredible activities.

#### **4-14-01 SERVING THE SURROUNDING COMMUNITY**

Mohegan Sun has the opportunity to create a destination resort experience built from the ground up in the Greater Boston Region of Massachusetts. As New England's leading gaming company, we know the ins and outs of operating in the region and have very deep, very specific knowledge of the regional experience that the market needs. Our knowledge comes from our direct experience in creating and operating the kind of place people will want to visit here in the Northeast. That means conducting business with the New England values of honesty, transparency, community and a solid sense of value. It means focusing Mohegan Sun Massachusetts (MSM) on the people with whom we will work and the people to whom we will extend our hospitality, because the experience is about them, not us.

#### **World Class Experience**

Anchored by approximately 600 rooms in two hotels, one positioned as a spa and meeting lodging and the other a gaming-centric hotel, MSM will feature a 150,000 sq. ft. of complementary public space. Visitors will be treated to a variety of dining options ranging from the fast and casual to delightful gourmet, with efforts underway to partner with unique and interesting brands. In addition, the overall retail offerings will feature tenants similar to the quality and variety at Mohegan Sun in Connecticut with more than three times the quantity of offerings.

Known worldwide as a premier destination, Mohegan Sun's Connecticut resort has a track record as one of the world's most amazing destinations with some of New England's finest dining, hotel accommodations and retail shopping. With our new destination in Revere, eastern Massachusetts will have the convenience of this world-class experience close to home.

## **Jobs**

Mohegan Sun is committed to using the existing labor force in the Commonwealth; as such we plan to host a series of "Working At" sessions to explain what it is like to work for Mohegan Sun.

## **Local Spend**

The wealth of non-gaming amenities at MSM will require a considerable number of suppliers for continuing operations. Based on the proximity of our Connecticut facility, we have existing vendor relationships throughout Massachusetts and are fully prepared, in accordance with the requirements of our Host Community Agreement, to continue focus on businesses within our Host Community.

Attachment 4-14-06 identifies the current list of Mohegan Sun vendors that are based in Massachusetts. Mohegan Sun has a proven track record of commitment within the communities in which we do business. Between Connecticut and Pennsylvania, Mohegan Sun spends \$500 million dollars annually with local and regional suppliers, and we are committed to further growth of expanded vendor relations in Massachusetts as well, particularly within eastern Massachusetts and in our Host Community and Surrounding Committees. This spending commitment will encourage local businesses to bid to become vendors, allowing successful vendors to grow their businesses and hire more employees.

Mohegan Sun has begun working with local businesses and business groups and will continue to work with all regional Chambers of Commerce and minority business groups to hold "Working With" vendor fairs to raise awareness and explain the steps to successful vendor participation with Mohegan Sun. Mohegan Sun is committed to making our destination resort work for the surrounding business community.

Attachments 4-14-02, 4-14-03, 4-14-04 and 4-14-05 provide examples of press releases and other media documents used by Mohegan Sun in the past to demonstrate our strategy planned for similar efforts in the region.

## **4-19 QUALITY OF AMENITIES**

Mohegan Sun Massachusetts (MSM) will be in a league of its own, set apart by its design, its high attention to detail, and its unique amenities, which will range from a destination spa to a greenhouse supporting farm-to-table dining. Its energetic, modern design will set it apart from nearby facilities like those in Atlantic City, New York and Connecticut. Mohegan Sun Resort

and Casino in Connecticut set the bar for quality of design at the time of its construction in the late 90s and was the first casino hotel to be recognized with national architectural design awards.

Designed with two key markets in mind, the project includes a destination resort hotel and a separate boutique hotel at a more modest price point. The project will require the excellent planning and programming skills, and are key to the continued success of the Mohegan Sun project in Connecticut. Unlike the high rise tower casinos and “big builds” that have little to no communication nor reference to their natural surroundings, MSM will establish a respectful relationship between itself and its surroundings thus reestablishing Revere as a thriving destination

## **5-02 IMPACTS AND COSTS**

### **5-02-04 MARKET STUDY**

#### **SECTION I: INTRODUCTION & SCOPE OF SERVICES PROPOSED MOHEGAN SUN MASSACHUSETTS REVERE, SUFFOLK COUNTY, MASSACHUSETTS DECEMBER 2013**

##### **Introduction**

PKF Consulting was retained to conduct research and prepare estimates of gaming revenue for the Mohegan Sun Massachusetts casino resort (“the Casino” or “the Resort”) proposed for development on a site at Suffolk Downs Racetrack in Revere, Suffolk County, Massachusetts. It has been assumed that the Resort will open on January 1, 2016.

Based on the preliminary master plan for the project, the following uses/facilities have been assumed for the Resort:

- A casino (“the Casino”) with approximately 4,000 slot machines, 100 table games and 20 poker tables (4,720 gaming positions). The Casino will be de-signed to enable expansion to 5,000 gaming positions.
- Two attached hotels totaling between 500 and 550 rooms.
- Approximately 100,000 to 150,000 square feet of purpose-built dining, lounge, entertainment and retail space (“RDE”).
- A spa of 10,000 square feet.
- Adequate structured and surface parking, with valet service offered.
- The Mohegan Sun Player’s Club frequent player program.

### **5-02-05 ECONOMIC IMPACT**

#### **1.1 Economic Impacts**

Mohegan Sun Massachusetts will generate significant economic impacts as one-time development expenditures, annual operational expenditures, and annual ancillary spending by casino patrons at outside businesses ripple through the local, regional, and state economies. Suffolk County and the State of Massachusetts will benefit from new economic activity, jobs, and employee salaries and wages.

The Casino’s development period will generate one-time impacts of \$821 million in total economic activity in Suffolk County and \$1.0 billion in the State of Massachusetts, as shown in Figure 1.1.

Figure 1.1: Summary One-Time Economic Impacts Attributable to Mohegan Sun Massachusetts (\$ Millions in 2016 Dollars & Total Jobs)

Description	Suffolk County	MA State
Total Economic Impact	\$821	\$1,048
Total Jobs Impact	4,478	7,335
Total Salaries & Wages Impact	\$321	\$469

Source: Tourism Economics (2013)

Annual operational expenditures at Mohegan Sun Massachusetts, along with annual ancillary spending by Casino patrons, will generate considerable *ongoing* economic impacts. In the Casino’s first year of operations, Suffolk County will benefit from \$482 million in total economic activity, more than 4,500 total jobs, and \$194 million in employee salaries and wages. The State of Massachusetts will benefit from \$616 million in total economic activity, including \$256 million in employee salaries and wages, supporting nearly 5,600 total jobs, as shown in Figure 1.2.

Figure 1.2: Summary Economic Impacts Attributable to Mohegan Sun Massachusetts Operations & Ancillary Casino Patron Spending in the First Year of Operations (\$ Millions in 2016 Dollars & Total Jobs)

Description	Suffolk County	MA State
Total Economic Impact	\$482	\$616
Total Jobs Impact	4,521	5,586
Total Salaries & Wages Impact	\$194	\$256

Source: Tourism Economics (2013)

### 1.2 Fiscal (Tax) Impacts

The economic impacts outlined above will also generate significant fiscal (tax) impacts as they cycle through the local, regional, and statewide economies. In its first year of operations,



Mohegan Sun Massachusetts will generate nearly \$217 million in gaming taxes and Massachusetts Gaming Commission funding. Mohegan Sun Massachusetts’ development period will generate a one-time impact of \$50.0 million in state and local tax revenues, while annual operations and casino patron ancillary spending will generate \$124.0 million in state and local tax revenues in the Casino’s first year of operations.

Figure 1.3: Summary One-Time and Annual Tax Impacts Attributable to Mohegan Sun Massachusetts (\$ Millions in 2016 Dollars)

Description	One-Time Impacts	Annual Impact (First Year of Casino Operations)
Gaming Taxes (25% of Gross Gaming Revenue)	NA	\$214.5
Gaming Commission Funding (\$600 per slot machine)	NA	\$2.4
<b>Total Gaming Tax Revenue</b>	<b>NA</b>	<b>\$216.9</b>
Social Insurance Taxes	\$0.7	\$0.4
Sales	\$16.4	\$35.4
Property & Corporate Taxes	\$15.4	\$78.5
Personal Income Tax	\$15.8	\$8.9
Excise and Fees	\$1.6	\$0.8
<b>Total State and Local Taxes</b>	<b>\$50.0</b>	<b>\$124.0</b>

Source: Tourism Economics (2013)

## MITIGATION

### 3-31

In addition to the significant economic development benefits outlined in Section 3 of this application, Mohegan Sun Massachusetts (MSM) will provide numerous community enhancements to benefit its host community of Revere, surrounding communities and the Commonwealth. Unlike our competitors, MSM will provide direct support for the preservation of the Commonwealth’s horse racing industry by providing a much-needed revenue stream in the form of ground lease payments to the Suffolk Downs racetrack. Building off of its location adjacent to a rapid transit station, MSM will set a new standard of excellence in sustainable design for gaming development projects. With a commitment to achieve LEED NC v2009 Gold Certification, MSM will be sustainably designed, energy efficient, environmentally conscious, and healthy for its employees and visitors. . MSM will also enter into agreements with its Surrounding Communities, as required by M.G.L. c. 23K, which will specify additional benefits to be provided, including access to funds from a state community mitigation fund.

### **3-31-01 OTHER COMMUNITY ENHANCEMENTS**

In addition to the significant economic development benefits outlined in Section 3 of this application, Mohegan Sun Massachusetts (MSM) will provide numerous community enhancements to benefit its host community of Revere, surrounding communities and the Commonwealth. Many of these are memorialized in the Host Community Agreement (the HCA) with the City of Revere, included as Attachment 3-31-02. MSM will also enter into agreements with its Surrounding Communities, as required by M.G.L. c. 23K, which will specify additional benefits to be provided, including access to funds from a state community mitigation fund. The development of MSM will provide numerous significant public benefits, included but not limited to the following:

#### **Capital Investments**

- o An estimated \$45 million in Infrastructure Improvements: Significant transportation improvements to the surrounding roadway network that will not only improve existing conditions and accommodate the additional resort-generated trips as documented in the HCA, including: (1) Route 1A at Boardman Street, Waldemar Avenue, Tomasello Drive and Furlong Drive – infrastructure improvements, widening, and signalization; (2) Route 1 at Route 16 – commitment to permit, design and construct improvements and signalization providing new access points between those two roadways, as well as find and complete a long-range study; (3) Route 16, Route 145, Harris Street – widening and lane enhancements; (4) Donnelly Square – redesign of intersection to provide for relocation of MBTA bus stops and turn-in lanes (subject to MBTA approval) as well as pedestrian, utility and Beachmont streetscape improvements; (5) North Shore Road/Revere Beach Parkway/Tomasello Drive – design and implementation and signal and pedestrian improvements; (6) Copeland Circle/Route 1 – channelization, signalization and pedestrian improvements; and (7) bicycle and pedestrian improvements in several locations.

- o Additional Infrastructure Improvements in Boston. Additional improvements in the City of Boston will be completed in connection with the MSM project – each of which will be documented in a Surrounding Community Agreement with Boston. As with all of the off-site infrastructure, these improvements will be subject to the review and approval of the entity that owns the improvement.

- o Funding for Athletic Field and Community Center in Revere: MSM will contribute a total of \$3 million to the City of Revere for renovation of a football field and construction of a new youth center, as well as provide designs for the youth center.

- o Strengthened MBTA Connection: Improved access to the MBTA Beachmont Station, including upgraded pedestrian and bicycle connections to MSM. Subject to further discussions

with the MBTA, MSM is also considering some improvements to the Beachmont MBTA Station to assist passengers using the station and to strengthen its connection to the project site.

- o Water Transportation Contribution: MSM is committed to supporting water transportation in the vicinity of the destination resort and is investigating options to participate in this effort.

### **Economic Benefits and Other Community Enhancements**

- o Securing the future of Massachusetts' Racing Industry: Ground lease payments by Mohegan Sun will provide a much-needed revenue stream for the Suffolk Downs racetrack, helping secure the future of the Commonwealth's horse racing industry, which directly and indirectly supports a significant number of jobs in the state. This commitment furthers the statutory goals of the Gaming Act. Without such support, maintaining horseracing at the Suffolk Downs racetrack would not be economically feasible.

- o Support for Local and Regional Businesses: MSM has committed to using best efforts to spend \$10 million annually on goods and services from vendors and companies in Revere, and \$50 million annually within 15 miles of Revere City Hall, and also intends to partner with Revere, Boston, Chelsea, and Winthrop area hotels, restaurants, entertainment venues and tourism organizations to attract visitors and boost the local economy. This unprecedented commitment is unlike anything that has been committed to by our competitors and will ensure that MSM benefits area businesses.

- o Payments to the City of Revere: The HCA provides for up to \$33 million in initial payments, and guaranteed minimum annual payments escalating from \$25 million to \$30 million during first four years of resort operations, with a potential for annual payments to grow beyond \$50 million based on gross gaming revenues.

- o Supporting local business through the expansion of MSM Points Partnership Program: To date, MSM has obtained documented interest from over 60 local retailers from the region regarding accepting "Mohegan Sun Momentum Points" as currency to be used in their retail establishments. Given that tens of millions of dollars is currently circulating within this program, participation of these affiliated retailers will broaden the options where guests can utilize their points and bring new Mohegan Sun customers to these local businesses.

- o Annual Business Development Grant: MSM will provide an annual grant in the amount of \$250,000 to a Revere non-profit or governmental entity to promote economic development in the City of Revere.

- o New Tax Revenues: MSM will generate significant new tax revenue at the state and

local levels in the form of income tax, sales taxes, hotel taxes, food and beverage taxes, as well as taxes on gross gaming revenues and new real and personal property tax revenues.

- o **Publicity for Tourism Attractions:** MSM will provide visitors with information about area attractions that will promote tourism throughout the region.
- o **Partnership with CitiCenter:** The CitiCenter Performing Arts Center (including the Wang, Shubert, and Emerson Colonial theaters), a 77 year old non-profit, has entered into a partnership agreement with MSM pursuant to which the two entities will collaborate on entertainment and cultural activities.
- o **Additional Community Benefits:** In collaboration with the City of Revere, MSM will establish a Community Advisory Board to provide additional community benefits (e.g., inclusion of local vendors) relevant to project impacts and to generally benefit the host community and its residents.
- o **Sponsorship for MBTA Extended Hours.** MSM intends to participate in the MBTA's recently announced pilot program to extend the T's subway and bus service for two additional hours per day at a sponsorship level to be determined in discussions with the MBTA. MSM will update the Gaming Commission and provide documentation of any sponsorship agreements with the MBTA once finalized.
- o **Ground Shuttle Connection Program.** In an effort to tie MSM to its surrounding communities and to limit vehicle trips to the site, MSM will operate a 24 hour shuttle service connecting the resort to Revere and other nearby business districts, nearby tourist and cultural attractions, area hotels, and regional transportation hubs.
- o **Art Program.** In recognition of the importance to MSM of the Community of Revere, local artists, and Revere's history, art will be displayed throughout the destination resort. These exhibits may take the form of rotating art displays, allowing for local community involvement. Public art spaces can be provided to display pieces created by students at local schools, and the wider community of all ages, further strengthening the ties between MSM and the community.

### **Extensive Employment Benefits**

- o **New Jobs:** Approximately 2,500 construction jobs and approximately 4,000 permanent resort jobs, the latter of which will encompass more than 39 job categories such as hotel/resort personnel, facility employees, food and beverage, gaming, racing, and management and operation and will include full job training, benefits and opportunities for career advancement.
- o MSM will host and maintain a central job bank website (in English and Spanish) as a micro-site within the larger MSM website.

- o MSM will utilize best efforts to use the existing labor force in the Commonwealth, and in particular the existing labor force in the City of Revere, when hiring for new construction jobs, as required by Section 18(17) of the Gaming Act.
- o MSM will hold job fairs proximate to destination resort site to make potential employees aware of job opportunities.
- o MSM will establish, fund and maintain human resource hiring and training practices that promote the development of a skilled and diverse workforce and access to promotion opportunities through a workforce training program that: (i) establishes transparent career paths with measurable criteria within the gaming establishment that lead to increased responsibility and higher pay grades that are designed to allow employees to pursue career advancement and promotion; (ii) provides employee access to additional resources, such as tuition reimbursement or stipend policies, to enable employees to acquire the education or job training needed to advance career paths based on increased responsibility and pay grades; and (iii) establishes a program or partnership to provide off-site child day-care, all as required by Section 18(9) of the Gaming Act.
- o MSM will provide Revere residents with advance notice of hiring activities by publishing announcements in local newspapers approximately four to eight consecutive weeks prior to initial hirings.
- o Host and surrounding community residents will be given first priority to apply for jobs during a specified “advance period,” and written flyers in English and Spanish will be distributed to publicize this period.
- o MSM will use best efforts to work with the Public Schools Department to establish school-to-work programs for hospitality jobs at vocational or public high schools in the host community.
- o Commitment to Workforce Training: MSM will work with the City of Revere to bring off-site employment training courses to the city and will consult with the city, the Massachusetts Casino Careers Training Institute and the associated community colleges to examine the feasibility of operating a satellite community college campus in Revere.
- o MSM will provide opportunities for team members to pursue personal and professional growth, to enjoy satisfying careers, to participate in training and development programs and to celebrate success including rewards and recognition for superior performance against measurable goals.
- o MSM will provide an educational assistance program that reimburses employees 90%

of tuition costs up to a maximum of \$3,000 per year for pre-approved undergraduate classes or up to a maximum of \$4,000 per year for pre-approved graduate study at an accredited college or university.

### **Green Design and Environmental Benefits**

- o **Sustainable Design/Green Building:** MSM will set a new standard of excellence in sustainable design for gaming development projects. With a commitment to achieve LEED NC v2009 Gold Certification, the resort will be sustainably designed, energy efficient, environmentally conscious, and healthy for its employees and visitors. Innovative technologies are currently being explored to determine what works best with the MSM project as well as what might set a visible example for those visiting the site.
- o **Off-site Photovoltaic Investment:** We are working with the City of Revere to identify one or more schools or other public buildings in Revere on which we could install an off-site PV array to provide energy savings for Revere.
- o **Commitment to Grease Recycling:** As we have done for several years at Mohegan Sun Connecticut and Mohegan Sun Pocono Downs, we will work with vendor(s) to pick up our used fryer (yellow grease) and GRU (brown grease) from MSM and recycle this product for Bio Diesel.
- o **Water Quality Improvements:** Improved stormwater management on the destination resort site, which will lead to enhanced water quality reaching Sales Creek, the Belle Isle Inlet, and Rumney Marshes ACEC.
- o **New Bicycle and Pedestrian Connections:** To enhance local and regional connectivity, MSM will improve bike and pedestrian circulation and access. The MSM project includes provision of on-street bicycle accommodations to connect Constitution Beach, Belle Isle Marsh, and Revere Beach along the Bennington Street corridor, along with connections to and through the i.e. project site from the Suffolk Downs MBTA station and from Winthrop Avenue. On-site pedestrian paths and aesthetically pleasing open spaces will encourage pedestrian activity and access, including at the site entries.
- o **Bicycle Amenities:** The MSM project includes bicycle parking, showers for employees, covered bicycle storage, and short-term bicycle parking. MSM has also committed to providing one or more bike sharing stations in conjunction with the future deployment of Hubway or an alternative bike-sharing network in the vicinity of the destination resort and at Revere Beach.

### **5-17 MITIGATION**

## **5-17-01 MITIGATION**

### **Mitigation**

Mohegan Sun Massachusetts (MSM) is committed to working with the communities proximate to the resort with respect to the resort's: (i) economic benefits to the region and the commonwealth; (ii) local and regional social, environmental, traffic and infrastructure impacts; (iii) impact on the local and regional economy, including the impact on cultural institutions and on small businesses in communities; and (iv) cost to the communities. The issues under consideration by MSM and the surrounding communities go far beyond traffic impacts and include lottery mitigation, compulsive gambling problems, workforce development and community development and other community impact and mitigation issues.

Of course, working with our neighbors is not just about mitigating impacts. It is also about making certain that the City of Revere and the entire region can fairly benefit from the economic benefits that will be generated by the resort.

This is why MSM has agreed to partner with potentially hundreds of local businesses to participate in MSM's "Points Partnership Program." This program should generate millions of dollars of new revenue to retail establishments in the region. As one example of the power of this program, in a matter of weeks, MSM already has enrolled more than 60 local retailers – from beauty parlors to corner delis to family-run Italian restaurants to "witch" history museums in Salem to French bistros to community banks – from Revere to Lynn in the program. As further detailed in our response to question 5-06 and Attachments 5-06-02 and 5-06-03, retailers participating in the program may accept "Mohegan Sun Momentum Points," which patrons of the resort earn, and then are free to spend as a cash-equivalent at local businesses. MSM also is committed to working with local businesses in these communities, including developing cross-marketing strategies with local restaurants, small businesses, hotels, retail outlets and live entertainment venues and adopting employee discount programs to encourage MSM's 4,000 employees to shop at these local establishments.

Further, MSM has agreed in principle on the terms of a Surrounding Community Agreement with the City of Chelsea.

MSM expects this agreement to be executed shortly. The Draft Surrounding Community Agreement with the City of Chelsea is provided as Attachment 5-17-02 and is explained in greater detail in our response to Question 5-15.

In addition to Chelsea, MSM and Suffolk Downs' representatives have been in discussions with Boston, Winthrop, Lynn, Salem, Saugus, Malden, and Medford regarding each community's potential status as a surrounding community. MSM has designated Chelsea, Winthrop and

Boston as “Surrounding Communities” as defined in the Expanded Gaming Act, Chapter 23K, and assuming that negotiations can be completed successfully, expects to execute a “Surrounding Community Agreement” with each of these communities in the near future. Discussions with Lynn, Salem, Saugus, Malden, and Medford are at various stages, but are progressing constructively and positively.

The issues presented by Boston, Chelsea and Winthrop, given the locations of those communities and their proximity to the resort, call for individual Surrounding Community Agreements with each. Since many of the issues raised by the remaining communities are common and since so many communities share an interest in resolving a limited number of regional traffic issues the source of which is in one community but the impacts are experienced in another, and because regional mobility, with or without the Resort, has been a complex regional issue for many years, MSM is proposing to execute one omnibus Surrounding Community Agreement with Lynn, Salem, Saugus, Malden, and Medford. Under this plan, all signatory communities would be eligible to draw from a pool of funds provided by MSM for the purpose of studying and advancing issues related to the resort, whether they are significant issues that may be unique to that community or issues of a more regional nature. The pool would be centrally administered by a regional agency to be agreed to by the parties. This approach will assure that resources are being put to good use, that efforts are not duplicative, and that regional issues of import to the many are being evaluated. In addition to the pooled funds, MSM is prepared to work with each potential surrounding community on issues of concern to that particular community.

- o Route 1A and Route 107 are the only corridors in Lynn expected to carry regional (external) resort trips to/from the North. Both roadways serve a relatively small part of the Resort catchment area.

- o There are no roadway corridors in Malden that would be expected to carry regional (external) resort trips to/from the North, other than the short section of Route 1 that passes through Malden north of Copeland Circle.

- o I-95 north, Route 128 and Route 1 are the corridors in Lynn expected to carry regional (external) resort trips to/from the North. Both roadways serve a relatively small part of the resort catchment area. It is expected that the resort trips on these regional routes would be through trips rather than trips joining or leaving the highway in Peabody.

- o Route 1A and Route 107 are the corridors in Salem expected to carry regional (external) resort trips to/from the North. Both roadways serve a relatively small part of the resort catchment area.



o Route 1 and Route 107 are the corridors in Saugus expected to carry regional (external) resort trips to/from the North. The regional (external) resort trips on Route 1 would be predominantly through trips rather than trips joining or leaving Route 1 in Saugus, with the exception of limited contribution from Route 129/Water Street and Farm Street/Main Street carrying resort trips from Wakefield. Route 107 has limited access within Saugus.

o Other than a small number of trips from Wakefield, there is very limited potential for resort traffic from outside Saugus to use the local roadway network as short cuts.

o There are no roadway corridors in Winthrop that would be expected to carry regional (external) resort trips.

There is no potential for resort traffic from outside Winthrop to use the local roadway network as short cuts.

## **OTHER**

### **4-30 MINIMIZING NOISE AND LIGHTING**

Overall resort lighting levels will be lower, in keeping with the more neighborhood nature of the resort. In order to create lighting solutions that are sensitive to the surrounding community, the lighting design created for the facility will minimize light trespass and reduce sky-glow. High-efficiency LEDs and low-level site lighting will ensure comfort and safety for patrons and staff while limiting unwanted light pollution. Parking facilities will implement similar solutions to ensure that spaces are safely lit for patrons and staff, while limiting the amount of light pollution emitted.

#### **4-30-01 – MINIMIZING NOISE & LIGHTING**

With respect to the resort's existing surroundings, noise and lighting created by the facility's amenities have been addressed through the conscientious choice of material to limit both factors.

#### **Light Reduction**

Site lighting will follow the spirit of dark sky lighting standards to reduce upward vectored light and light pollution. In order to create lighting solutions that are sensitive to the surrounding community, the lighting design created for the facility will minimize light trespass and reduce sky-glow. High-efficiency LEDs and low-level site lighting will ensure comfort and safety for patrons and staff while limiting unwanted light pollution. Parking facilities will implement

similar solutions to ensure that spaces are safely lit for patrons and staff, while limiting the amount of light pollution emitted.

Site wayfinding elements and signage will utilize the latest in LED technology, all feature vertical backlit elements will use significantly less energy and allow dynamic and transitional lighting applications. Elements during the day can be lit to match the daylight while the same elements at night can take on a twilight effect. The result is a more integrated lighting program that does not overpower the surrounding landscape.

### **Noise Reduction**

An ambient sound level measurement program was conducted to document existing “baseline” conditions surrounding the proposed project. Existing noise sources include: vehicular traffic on local roadways, trains, aircraft, wind and leaf noise, pedestrian conversation and foot traffic, rooftop and residential mechanical equipment located on the surrounding buildings, and sound from the existing Suffolk Downs racetrack. Mechanical equipment and other stationary noise sources will meet the applicable City of Revere requirements.

With appropriate mitigation (listed below), we believe that the resort is not expected to introduce significant outdoor mechanical equipment noise into the surrounding community.

The recommended mitigation efforts included in the analysis are as follows:

1. Each emergency generator will be fitted with a critical-grade exhaust silencer and sound- attenuating enclosure. Routine testing of generators will be scheduled during daytime hours only when background sound levels are higher.
2. The CUP cogen engine exhaust ducts will be fitted with critical-grade exhaust silencers, and any proposed ventilation openings in the CUP building will contain acoustical louvers.
3. Noise barrier walls will enclose the CUP cooling towers and emergency generators as well as the rooftop air-handling units.

At this time, mechanical equipment and noise controls are conceptual in nature and, during final project design, will be specified to meet the applicable City of Revere, MassDEP, and other applicable noise limits. Additional mitigation may include the selection of quieter units, acoustical louvers, screening walls, mufflers, or equipment enclosures, as needed.

The included technologies will prevent excess light and noise pollution from adversely affecting the gaming facility and the Revere community as a whole.

The LEED checklist is provided as Attachment 4-30-02 for reference.

## **4-35 REGIONAL WATER FACILITIES**

Water service exists in Winthrop Avenue along the north of the site including MWRA transmission lines and local City of Revere service lines. The project site is currently served by three water stubs that are connected to the City water line in Winthrop Avenue. We have several programs in place which will reduce water demand (notably rainwater harvesting and greywater recycling). The City has verified that adequate pressure exists. We will continue to coordinate with the City of Revere regarding providing water service for the development

#### **4-36 SEWAGE FACILITIES**

There is existing sanitary sewer service located close to the project site in Winthrop Avenue. There is sufficient capacity at the MWRA treatment plant to accommodate the resort's wastewater flows. There are a number of potential routes by which resort sanitary sewage could ultimately be directed to the MWRA for treatment. Mohegan Sun will coordinate sanitary sewer connections and any necessary upgrades or relocations with the applicable authorities.

#### **4-36-01 SEWAGE FACILITIES**

##### **Sewage Facilities**

Municipal sanitary sewer service for the resort will most likely be provided by the City of Revere in conjunction with the Massachusetts Water Resources Authority (MWRA). Mohegan Sun will evaluate the possibility of reuse of the existing Concentrated Animal Feeding Operation (CAFO) wastewater line that discharges to the Boston Water and Sewer Commission (BWSC) system in conjunction with the MWRA. The existing CAFO will be substantially discontinued. There is sufficient existing capacity at the MWRA treatment plant to accommodate the resort's wastewater flows.

Sanitary sewer mapping obtained from City records show a number of potential routes by which resort sanitary sewage could ultimately be directed to the MWRA for treatment. There is an existing 8 inch gravity sewer line located in Winthrop Avenue that is owned and maintained by the City of Revere. This line connects to a 20" gravity sewer line that runs westerly through an easement, through the recently completed Police and Fire Department facilities and residential and industrial areas, before it connects to a larger 36" gravity line in Revere Beach Parkway which ultimately connects to the MWRA system. The MWRA line flows to the MWRA's Deer Island Treatment Facility. Wastewater generation for the MWRA system has generally declined over the past 10 years. The 10 year total wastewater generation average for the MWRA system is 362 million gallons per day. The 10 year dry day wastewater generation average for the MWRA system is 317 million gallons per day. The MWRA's NPDES permit limits the dry day wastewater flow to the Deer Island Wastewater Treatment Plant to 436 million gallons per day.

Mohegan Sun will coordinate sanitary sewer connections and any necessary upgrades or relocations with the applicable authorities.

Wastewater generation estimates for the resort were developed based on wastewater generation rates from MassDEP (310 CMR 15.2), Title 5 of the State Environmental Code. There are no flow factors for casino uses in 310 CMR 15.2. Reasonable assumptions for flow rates were made for gaming uses based on similar types of uses. For instance, project engineers concluded that a wastewater flow factor for gaming positions was most similar to the wastewater flow factor for a Lounge or Tavern as described in Title 5. Therefore, a wastewater flow factor of 20 gallons per seat was used for gaming positions. Wastewater flow factors for other uses in the resort were applied to the size of the different uses to develop flow estimates. These rates represent “worst-case” maximum daily flows. Actual flows are expected to be considerably lower due to the inclusion of efficient design features (e.g., low-flow water fixtures and equipment). The daily discharge for the resort is estimated as 243,213 gallons per day. See Attachment 4-36-02 for the Sanitary Sewer Flow Estimates Calculation Sheet for the Resort. This flow represents a small percentage of the City of Revere and MWRA system wastewater generation flows.

The resort will utilize a number of methods to minimize sewage generation. For example, plumbing fixtures will be low-flow or waterless, and low-flow fixtures will be used in hotel guest bathrooms. Relative to normal plumbing fixtures, the use of low-flow fixtures and equipment in resort buildings, coupled with public education and rainwater harvesting and reuse and greywater reuse are currently anticipated to reduce water use considerably with a concomitant reduction in wastewater generation.

All new sanitary sewer facilities will be installed per the State Plumbing Code. Any drainage waters collected from garages (e.g., snow melt, etc.) will be collected in a plumbing waste system, pass through an approved oil/sediment trap, and then discharge to the sanitary system.

Aging infrastructure in municipal sanitary sewer lines has resulted in infiltration and inflow (I/I) of extraneous clean water. As a result the City is currently under a consent decree from EPA restricting new connections. Mohegan Sun acknowledges the governmental policies regarding offsetting wastewater flow increases with many-fold reductions in I/I (e.g., 10:1 I/I reduction, and associated fees, in Revere). Mohegan Sun will comply with applicable I/I mitigation requirements. Meeting the I/I removal targets ensures that the MWRA treatment facility at Deer Island continues to have adequate capacity to accept the resort’s wastewater flows and that the added wastewater flows for the resort are within the applicable MWRA flow allotment. Mohegan Sun is fully committed to working with the relevant officials to provide mitigation to offset new wastewater flows from the resort.

Attachments 4-36-03 and 4-36-04 illustrate the City of Revere’s Sanitary Sewer System in relation to the site.

#### **4-41 STORM WATER**

The project will greatly improve stormwater quality at the site. Currently, the site is developed with paved parking areas, material storage areas, and a Concentrated Animal Feeding Operation (CAFO) occupied by horse stables. The majority of the site is paved. Stormwater management on the site is provided by a stormwater management system that was installed when the site was developed in the 1930s, long prior to the development of stormwater best management practices and stormwater management guidelines. The majority of the site drains directly to Sales Creek with little or no water quality treatment. The proposed project will result in a significant reduction in the amount of impervious surface. The CAFO will be removed from the project site. All of the stormwater generated by the project will be collected by a closed collection system and treated consistent with the State Stormwater Management Guidelines. There will be very little surface parking associated with the project. The majority of stormwater generated by the project's impervious surfaces will be generated by the building's roof, which is essentially clean water. The project will also incorporate a rainwater harvesting tank to collect and reuse stormwater generated by the building roof.

#### **4-41-01 REGIONAL WATER FACILITIES**

The project will greatly improve stormwater quality at the site. Currently, the site is developed with either paved parking areas, material storage areas, or a Concentrated Animal Feeding Operation (CAFO) occupied by horse barns and stables. The majority of the site is paved. Stormwater management on the site is provided by a stormwater management system that was installed when the site was developed in the 1930s, long prior to the development of stormwater management best management practices and stormwater management guidelines. The majority of the site drains directly to Sales Creek with little water quality treatment (See attached 4-41-06.)

The proposed project will result in a significant reduction in the amount of impervious surface. The majority of new impervious surface water will be created by the building's 525,000 square foot (approximately) roof, runoff from which is essentially clean water. The remaining impervious surface will consist of access driveways, including Tomasello Drive. The CAFO will be eliminated from the project site. There will be very little on-site surface parking. The majority of on-site parking will occur underneath the building. Therefore, there will be limited amounts of pollutants generated by parked vehicles that would be conveyed off-site or to Sales Creek. Stormwater generated by the building roof will be effectively clean water and will not carry the pollutant load typically experienced by site access driveways and parking areas. The site access driveways will include a closed drainage system that collects and provides water quality treatment consistent with the Stormwater Management Guidelines. The Existing Drainage Areas Plan and Proposed Drainage Areas Plan are provided as Attachments 4-41-04 and 4-41-05 respectively. Some surfaces will be routed to on-site bioretention basins or other low impact development best management practices that will provide enhanced treatment for

phosphorus, nitrogen, and bacteria. All of the stormwater generated by the project will be collected by a stormwater collection system and treated consistent with the State Stormwater Management Guidelines. The Checklist for Stormwater Report and Stormwater Guidelines Narrative are provided as Attachments 4-41-02 and 4-41-03 respectively.

The project will include the use of rainwater harvesting tanks. These tanks will collect stormwater generated by the building roof and reuse it either in the building for cooling tower water or toilet flushing.

The project will utilize a portion of the existing CAFO system for stormwater management. The existing CAFO will no longer exist on the site. Therefore, the CAFO settling basin will be cleaned and utilized as a stormwater detention basin. The detention basin will collect stormwater generated by approximately one-half of the building roof. Stormwater routed to the detention basin will be stored and released to Sales Creek. The majority of this stormwater will be clean water generated by the building roof, even prior to being treated by the detention basin.

Overall, the quality of stormwater generated by the site will be much improved over the existing condition. The reduction in pollutant discharges from the site will result in improved water quality in Sales Creek prior to its discharge to the Belle Isle Marsh.

Groundwater recharge will be provided as appropriate. Soil conditions on site are urban fill with high groundwater which limits the project's ability to provide groundwater recharge. There will be a reduction in impervious surface on the project site which will increase the amount of stormwater that infiltrates into the ground.

Anticipated best management practices to be used on the project site include the following:

o Structural Pretreatment

- Deep sump catch basins
- Oil/grit separators
- Proprietary separators
- Sediment forebay
- Vegetated filter strips

o Treatment

- Rain gardens/bioretenion
- Bioretention basins

o Conveyance

- Natural drainage channels
- o Infiltration
  - Subsurface structures (where appropriate)
- o Alternative
  - Green roof

Attached for reference is the LEED Checklist as Attachment 4-41-07.

#### **4-66 SECURITY OF PREMISES**

At Mohegan Sun, we have gained transferrable operational experience in security and the prevention of unlawful behavior in our Connecticut, Pennsylvania and New Jersey (managed) properties. This experience has resulted in the development of policies, procedures and unparalleled coordination with law enforcement agencies to deter or reveal any attempts at unlawful activity. We utilize a dual approach of active patrol techniques and closed circuit television, internally and externally, throughout our properties. An onsite Director of Security heads up a team of well-trained security representatives working across the establishment and ensures excellent cooperation and coordination with the law enforcement authorities.

We also advocate the use of leading technologies to support our primary security responsibility - the protection from and the elimination of, any element or agent that may jeopardize the welfare and security of the guests and employees of the establishment.

#### **4-67 HISTORY OF SECURITY**

Mohegan Sun owns and operates two gaming facilities in the States of Connecticut and Pennsylvania. At both facilities we have established a solid working relationship between our security and surveillance departments and the local law enforcement agency. The primary objective of this Mohegan Sun/law enforcement agency collaboration is to promote and enhance public safety at our venues. Our unique approach to information-sharing allows us to maximize the ability of onsite security and law enforcement to recognize and interdict unlawful activity at the earliest point possible.

#### **4-71-03 PROJECT CHANGES**

##### **Project Changes**

On October 18, 2013, the Project received a Certificate on the Draft EIR from the EEA Secretary which stated that the Draft EIR “adequately and properly complies with the Massachusetts Environmental Policy Act.” Since issuance of the Secretary’s Certificate on the Draft EIR, there have been several important changes to the Project. First, since the Draft EIR was submitted, Mohegan Sun has become the casino operator for the Project, taking over from Caesars Entertainment.

On November 5, 2013, referenda were held in both East Boston and the City of Revere pursuant to the Gaming Act. The original project received a positive vote in Revere and a negative vote in East Boston. Mohegan Sun Massachusetts (MSM), the new Proponent, will honor that community’s vote on land use for the Boston portion of the Suffolk Downs property. As a result, MSM has developed an alternative proposal that will not involve siting a gaming facility in Boston, but will instead reconfigure the Project so the gaming facility will be located entirely on the Revere portion of the Suffolk Downs property (to be ground leased from Sterling Suffolk Racecourse, LLC). This part of the property is approximately 39.7 acres, more than enough area to accommodate a world-class gaming resort. What remains unchanged is a commitment to build the most environmentally friendly resort casino in the world. MSM is in the process of completing a Notice of Project Change and will file with MEPA by the end of January.

The Draft EIR for the original project was filed with MEPA on September 3, 2013 and was the result of extensive study and outreach to impacted communities and relevant state and local agencies and contains detailed analysis of transportation, environmental, and infrastructure impacts. Subsequent to filing the Draft EIR, the Project was reconfigured to be located entirely on the Revere portion of the Suffolk Downs property and was modified to meet the objectives and design goals of MSM. This reconfiguration and redesign includes a reduction in the number of planned gaming positions (from 6,000 to 5,000), which will result in lower trip generation and reduced traffic-related impacts. The proposed gaming space is now 171,812 square feet, reduced from 338,330 square feet.

Proposed space for restaurants and bars has increased from the original proposal, from 74,440 square feet to 92,200 square feet. Flexible meeting and event space has remained mostly the same, increasing slightly from 38,110 square feet to 44,800 square feet.

Similar to the original proposal, the revised Project includes two hotels, and while the original proposal involved a total of 450 keys and 353,140 square feet of hotel space, the revised Project proposes between 450 and 550 keys and approximately 369,554 square feet of hotel space. The revised Project involves approximately 102,000 square feet of retail and retail circulation space, up from approximately 30,000 square feet in the original proposal. Spa/fitness space remains mostly the same, and at 12,100 square feet is up only slightly from the original 10,000 square feet.



Support, loading, back-of-house, and utility spaces now total 167,600 square feet, up from 133,065 square feet. Similar to the original proposal, the revised Project includes a rooftop greenhouse proposed at 5,000 square feet versus the original 5,656 square feet. In total, the revised Project is 965,066 square feet, a decrease of 17,475 square feet from the original proposal at 982,741 square feet.

**Table 1**

**Comparison of Revised Project Program to Original Proposal (square feet)**


\*Includes racing.

NOTE: This table shows programmatic spaces; thus, structured parking is not included. Mohegan Sun is planning a structured parking facility underneath the casino for approximately 4,200 cars (1.66 M square feet). Surface parking for 270 cars will also be provided on-site. Caesars previously included a parking garage of 840,880 square feet and surface parking for 5,100 parking spaces in total.

**4-72 EOEEA CERTIFICATE (ENF)**

**Attachment – Certificate**

**5-02-01 IMPACTS AND COSTS**

Mohegan Sun Massachusetts (MSM) has commissioned several studies that extensively analyze the potential costs and local and regional social, environmental, traffic and infrastructure impacts

of the resort. MSM has reviewed these studies in great depth. MSM has used the specific findings of all of these studies to tailor location-specific mitigation measures in the existing and proposed host and surrounding communities by agreements.

A brief explanation of the studies submitted by MSM thus far follow below:

A. The “Crime and Casinos” study was commissioned in 2009 and drafted by the Innovation Group. The study examines the relationship between the development of casinos and crime rates. The study concludes that no empirical evidence supports the conclusion that the resort would result in city-wide increases in major crimes. Recommendations for minimizing the impact of the casino on the surrounding neighborhoods include: providing adequate on-site security, especially in the parking areas, additional police patrols in the area around the casino, proactive monitoring of problem gaming, and a crime reporting system designed to capture and identify casino related crimes. MSM will adopt these recommendations and has a proven track record in successfully implementing the same or similar measures at its resorts in Connecticut and Pennsylvania. This study is provided as Attachment 5-02-02.

B. “Impacts of a Casino at Suffolk Downs on Small Local Business” also was prepared by the Innovation Group and analyzes the experience of local businesses in the area of similar gaming resorts. Case studies within the study include: Shreveport, Louisiana, New Orleans, and Cleveland. The study recommends an “outside oriented” approach in order to create success for local businesses, as well as community wide marketing of local businesses. As explained in great detail in the responses to Questions 3-14, 5-01, 5-17, and elsewhere, MSM’s “Business Partnership Program” and “Points Partnership Program” are the industry exemplar of local business partnerships. These programs will (1) generate millions of dollars in revenue for local businesses by offering retailers the opportunity to accept “Mohegan Sun Momentum Points” earned by resort patrons as a cash-equivalent; and (2) partner to develop cross-marketing strategies and discount programs to create a vastly expanded customer base for local retailers. MSM is uniquely positioned to implement the recommendations of this study. This study is provided as Attachment 5-02-03.

C. The “Market Study with Gaming Revenue Projections” study was completed by PKF Consulting USA (PKF). PKF visited the host and surrounding communities, and analyzed the gaming markets within and outside of Massachusetts. PKF concluded that the region around the resort is highly suitable for the development of the resort, given the growing and prosperous nature of the surrounding area, while complemented by a stable economy and visitor base. PKF projected that gaming revenue in the resort’s first year of operation would be \$808.4 million and that at maturity will be \$1 Billion. This study is provided as Attachment 5-02-04.

D. The “The Economic & Fiscal Impacts of the Proposed Mohegan Sun Massachusetts Casino” study was produced by the firm, Tourism Economics. The study analyzed the economic impacts of the resort in the greater region. Tourism Economics predicts that the development of

the resort will create an overwhelmingly positive ripple effect through the local, regional, and state economy. These positive multiplier effects will be caused through development expenditures, annual operating expenses of the resort, and substantial ancillary spending at local businesses. Additionally, Tourism Economics projected that the resort would produce a wide array of benefits for the Commonwealth from the influx of jobs, higher salaries, and economic development, as well as increased tax income. This study is provided as Attachment 5-02-05.

E. The “School Impact & Mitigation Analysis for a Proposed Casino in Revere, Massachusetts” was drafted by Professor Clyde W. Barrow, Ph.D., Director of the Center for Policy Analysis, University of Massachusetts-Dartmouth, and David R. Borges doing business as Pyramid Associates. The study confirms that the population is unlikely to increase in the communities around the casino due to the available labor pool to fill resort jobs that currently exist in the Greater Boston-Revere area. This robust existing labor pool makes it unlikely that there will be a significant in-migration of population (school-age or otherwise) to the neighborhoods around the resort – a different scenario than that facing more rural gaming resorts. This study is provided as Attachment 5-02-06.

F. The “Lottery Impact & Mitigation for a Proposed Casino in Revere, Massachusetts” study also was completed by Professor Barrow and Mr. Borges. Professor Barrow and Mr. Borges conducted case studies in jurisdictions that have introduced expanded gaming and analyzed the impact of expanded gaming on the state lotteries in those jurisdictions. The study concludes that many jurisdictions experience small declines in lottery profits over a short term. However, the research further concludes that state lottery profits recover and eventually exceed prior record sales just two-to-four years after the introduction of expanded gaming.

The study determined that the lottery aid and mitigation provisions of Chapter 23K provided sufficient protections that will offset any potential short-term reductions in state lottery profits. As detailed in the response to Question 5-22, MSM is fully committed to fulfill its duties as a state lottery agent, and will aggressively promote lottery games in its marketing materials and with prominent placement of kiosks in the resort. This study is provided as Attachment 5-02-07.

G. The Draft Environmental Impact Report (“DEIR”) was filed with MEPA on September 9, 2013 and noticed in the Environmental Monitor on September 11, 2013. This DEIR was the result of extensive study and outreach to impacted communities and relevant state and local agencies and contains detailed analysis of traffic, environmental and infrastructure impacts of the resort. The two volumes of the DEIR are included as Attachments 5-02-08 and 5-02-09. Subsequent to filing the DEIR, the proposed project was reconfigured to be located entirely on the Revere portion of the Suffolk Downs property and was modified to meet the objectives and design goals of Mohegan Sun Massachusetts. This reconfiguration and redesign included a reduction in the number of planned gaming positions, which will result in lower traffic counts and fewer traffic-related impacts. Because of the similarities in the program and

project location and due to the similarities in traffic patterns, we are expecting the same proportion of our traffic to come from Route 1A in the same direction, and that the impacts of the project will affect the same overall geographical area that we previously studied. Because fewer gaming positions are now planned, we believe that the estimates in the DEIR are very conservative. As a result, the DEIR is still a relevant study of the potential project impacts. As is the normal course of conduct under MEPA and pursuant to the MEPA regulations, we will file a Notice of Project Change (“NPC”) describing the material changes to a Project and expect to do so at the end of January.

H. Section 5 and Appendix A of the DEIR include evaluations of the existing transportation conditions surrounding the project, as well as projected future conditions generated by the resort. Additionally, the DEIR describes the improvements to the transportation system and other mitigation measures that will be undertaken to mitigate impacts, and improve longstanding background traffic conditions. The traffic analysis contained in the DEIR has been reviewed by MSM’s consultant since the filing of the DEIR to reflect changes in the project, and those modifications are contained in answers 4-23, 4-24, 4-25, and 4-26 and included here a Attachments 5-02-10, 5-02-11, 5-02-12, 5-02-13, to this response. Reference is also made to the Host Community Agreement with the City of Revere (Attachment 5-04-01 Revere HCA), which provides a detailed list of infrastructure improvements to be completed by MSM in connection with the project, as well as the projected costs of those improvements. More detailed explanation on the infrastructure improvements, traffic, environmental and other mitigation measures to be undertaken by MSM are provided in the response to Questions 3-31, 4-23, 4-24, 4-25, 5,01, 5-04, 5-33, and 5-34 and will continue to be evaluated through the MEPA process.

Updated information regarding the water, wastewater, and stormwater impacts of the resort will be provided as part of the updated answers to Questions 4-35, 4-36, and 4-41 that are due to the Massachusetts Gaming Commission on January 21, 2014.

### **5-02-06 SCHOOL IMPACTS**

#### **EXECUTIVE SUMMARY**

Dr. Clyde W. Barrow, Director of the Center for Policy Analysis at the University of Massachusetts Dartmouth, and doing business as Pyramid Associates, LLC, a limited liability company registered in the Commonwealth of Massachusetts (see Appendix A), was retained to prepare a written analysis of the potential impact on local schools of a proposed resort casino in Revere, Massachusetts.

The Consultant conducted a review of the extant scholarly and grey literature, which assesses the impact of casinos on school capacity, construction, teaching staff, and curriculum. The Consultant also conducted an analysis of existing labor availability to determine whether the proposed resort casino will require labor immigration into the local workforce area that would impact existing school capacity and curriculum in the host and surrounding communities.

Based on this information, the Consultant concludes that:

...

- The Consultant concludes that since an extensive search of academic literature in two widely utilized data bases could find no academic research on the impact of casinos on schools, this finding suggests that school impacts have not been a significant problem associated with the introduction of casino gaming.

The Consultant also conducted an extensive review of “grey literature,” which consists of studies and reports by private consultants and government agencies. The Consultant did not find school impacts to be a concern in most of these studies, although:

- There has been a growing discussion of this issue in New England primarily due to the experience with the two casinos in southeastern Connecticut, where host and surrounding communities experienced a significant increase in the number of ESOL students and expenses associated with those students.
- The southeastern Connecticut experience and various anecdotes associated with these developments have been widely reported in the Massachusetts media and seem to be the basis for concerns about the potential impact of casinos on local school spending.
- However, the events in southeastern Connecticut appear to be *sui generis* and not so much related to the impact of casinos *per se*, but are the result of a peculiar confluence of rapidly expanding mega-casinos located in a sparsely populated area of Connecticut, which generated a county-wide labor shortage during a period of significant economic growth in the region.
- Consequently, the dramatic increases in ESOL students in this instance occurred only after casinos were unable to fill positions with area residents and began recruiting non-English speaking workers from New York City and Boston as well as from other countries in late 2001.1
- Moreover, since southeastern Connecticut’s two Indian casinos are located on sovereign lands, neither casino pays property taxes to its host community, nor are they required to share gaming revenues with the host or surrounding communities.

...

### ***Labor Availability and Workforce Diversity***

The Consultant conducted a labor market analysis that demonstrates:

There is a sufficient local labor pool to meet both the required (by host community agreements) and at-large employment needs of a Mohegan Sun Massachusetts casino.

- Thus, there is unlikely to be a significant influx of individuals and families from outside the region due to the sheer size of the unemployed labor pool within a 45-minute drive time of the gaming facility, with a significant portion of those individuals living within a quick walk, drive, or public transportation ride to the casino.

- Moreover, educational attainment levels, particularly in terms of individuals with a high school diploma, match well with the occupational and educational attainment distribution of casino jobs.
- Similarly, the ethnic, racial, national (foreign-born), and linguistic diversity of the local labor force, matches well with the workforce typical of a resort casino and, consequently, the opening of a casino in Revere, Massachusetts will not significantly alter the demographic character of the host and surrounding communities.

...

### **5-31 TREATMENT AND PREVENTION**

Over the last decade, Mohegan Sun has established a strong working relationship with the National Council on Compulsive Gaming and the state chapters where it has facilities. Our Chief Operating Officer, Ray Pineault, is the Treasurer of the National Council on Compulsive Gaming. We have had a strong relationship with the Massachusetts Council on Compulsive Gambling (Massachusetts Council) for over a decade. Going forward we remain committed to the Massachusetts Council and the Massachusetts Gaming Commission (Commission) to cooperate in the creation of informational materials, including brochures, support help taglines and self-exclusion policies and processes to make certain that patrons with gambling-related problems can find help easily and without fear of embarrassment. We are also committed to local providers and our relationship with them will not be limited to just a referral. Mohegan Sun Massachusetts (MSM) will follow up with the service providers on each self-exclusion to determine whether they sought treatment and the length of time they continued treatment so that we can include this information in our statistical feedback to the Massachusetts Council and the Commission in order to enhance future programs/efforts

Specific traffic control and operations strategies include the use of physical barriers and channelizing devices, additional traffic control personnel both onsite and at critical offsite intersections, public notice through public information efforts, advertising of alternate routes, increased use of public transportation and the resort's ground shuttle operation and other efforts

### **5-36 HOUSING**

#### **5-36-03 PROPERTY VALUE STUDY**

##### **PROPERTY VALUE IMPACTS**

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###### **Introduction**

There has been a significant amount of debate in the local and national press as to the impact of a casino on property values in the immediate vicinity of a casino, and the topic has been part of

the public discourse over a potential new casino at Suffolk Downs. Based on our analysis and on a review of the literature and research the weight of the evidence tends to support an increase in property values.

The factors that support an increase in property values include:

1. Increased demand for housing as a result of additional employment generated by the casinos.
2. Increase attractiveness of the area for commercial establishments which hope to draw demand from the large volumes of visitors drawn to the casinos.
3. Local communities in the vicinity of a casino are able to improve services and/or reduce property tax levels due to payments from the casino.
4. The amenities provided by the casino in terms of entertainment and F&B will provide an incentive for certain individuals who value these amenities to look at purchasing homes in the area.
5. Property speculators who recognize the likelihood of property value increases and seek to benefit from this.
6. Revitalization of communities and specific areas within communities that have needed cleaning up, capital investment, or an entertainment anchor, etc., which then functions as a catalyst to create a spillover effect on adjacent properties that then experience increased property values.

On the other side of the coin, those who suggest casinos cause a decline in property values point to concerns over crime<sup>1</sup> and traffic as the controlling factor. It should be pointed though that there is no evidence for increased crime and traffic issues are generally mitigated through infrastructure investment by the casino itself or by the local municipality often subsidized by funds from the casino. The following presents both anecdotal and quantitative information on the impact on property values in the immediate vicinity of a casino.

### Evidence Supporting Property Value Increases

The most comprehensive study on residential property value impacts related to casino development can be found in “Betting on the Future: The Economic Impact of Legalized Gambling” by the Rappaport Institute for Greater Boston and Dartmouth College published in January of 2005<sup>2</sup>. This analysis looked at data for 365 Indian casinos located in 156 different counties in 26 separate states. To make the analysis more relevant to the debate over casino legalization in Massachusetts, the authors added a number of counties with greater populations and counties which were home to larger casinos to serve as analogs to what the more populous communities in Massachusetts might experience.

The Rappaport study indicates that casinos are associated with population, employment and house price increases and unemployment declines. The exception is for the most populous casino counties where these beneficial impacts are more muted and where unemployment actually increased. The latter is more likely due to macroeconomic issues in these counties rather than the presence or lack thereof of a casino. The following table is reproduced from the Rappaport analysis.

	All casino-counties	Large -capacity casino counties	Populous casino counties	Average effect
Population growth (%)	5	8.6	8.1	7.2
Total employment (%)	6.7	14.9	5.7	9.1
Unemployment (%)	-0.3	-1.2	0.5	-0.3
House prices (increase)	\$5,869	\$8,924	\$7,083	\$7,292

This analysis suggests that there is a positive impact on house prices and therefore property values.

A recent dissertation found similar effects. In “The Impact of Casino Gambling on Housing Markets: A Hedonic Approach”<sup>3</sup> (2007), Mike Wenz states that “Using data from the 1990 and 2000 U.S. Census of Population and Housing, the estimated net benefit of casino gambling at year 2000 levels was approximately 2% of household value, or about \$2,000-\$3,000 per household for households living near a casino. Additionally, there are positive spillover effects to neighboring in-state regions and no significant costs to out-of-state border regions.” The dissertation also found that benefit declines as population increases.

So while both these analyses see a benefit in terms of increasing housing property values, they differ in the degree, and both see less benefit with increasing population in the surrounding area.

Research on the impact on the value of commercial real estate is scant, and the one study available in the academic literature concludes that casinos have a positive impact. A study on the effects of casinos in downtown Detroit found a significantly positive influence on retail property values from casino development.<sup>4</sup> The effect was shown to be stronger within a 5-mile radius of the casinos, suggesting that casinos have a complementary, rather than substitution, effect on other businesses.

In addition to the quantitative evidence there is also some qualitative and anecdotal evidence to support increasing commercial property values as a result of casinos development.

As part of its evaluation of the Argosy Riverboat in Lawrenceburg, Indiana the Indiana Gaming Commission<sup>5</sup> and its consultants conducted a focus groups with community leaders including



representatives of law enforcement, local business leaders (retail, restaurant, hotel, convention) from both Rising Sun and Lawrenceburg, and Social services providers (from or serving Rising Sun and/or Lawrenceburg). All three groups stated emphatically that the presence of the riverboat had increased commercial property values. In the summary the evaluation stated “Property tax reassessment increased assessed values and reduced tax rates”.

In addition, Browne, M.N. and N.K. Kubasek, in an article entitled “Should We Encourage Expansion of the Casino Gambling Industry?”<sup>6</sup>, concluded that:

“Virtually every community that has welcomed casinos has witnessed a sharp increase, occasionally almost instantaneously, in property values.”

### Case Studies

To determine if gaming had an effect on property values, we compared median housing values in a number of communities from 1990 and 2000 census data<sup>7</sup>. These locations were selected for two primary reasons, first they were in operation prior to 2000 but not in 1990. This allowed the effect on housing values to be assessed by comparing data from the 1990 and 2000 census (using data for the 2010 census was not considered as appropriate given the housing crash that occurred in 2007-2008 and from which housing values have not yet recovered) and secondly for the availability of local housing value data. To determine what effect gaming had on property values, we compared the change in property values surrounding the casino to those of a control group. The control group was a similarly situated locality that did not have any gaming facilities operating during the time period. By examining the different growth rates for the gaming and non-gaming locations, we can begin to understand if the introduction of gaming has an effect on surrounding property values.

### Wheeling, West Virginia

Wheeling Island is a greyhound racetrack that, at the time of this case study, featured 2,400 slot machines, 6 restaurants and a 151-room hotel. It is located in Wheeling, West Virginia. The control community chosen was Morgantown, WV, located to the southeast. Housing value growth in this case study did not appear as stratified as in the other locations. Here the city and county which was host to a casino saw an increase in median housing values in the time period by 43% and 46%, respectively. The control city and county increased housing values by 37% and 48%, respectively. The two do not appear to be markedly different.

The census tract hosting the racetrack saw an increase in housing values of 44%. Again, the increase was not particularly different from the other locations. In this instance, it would appear that the racetrack had little to no impact on housing values in the immediate area.

### Wheeling Island Median Housing Values

	1990	2000	Percent Change
Census Tract	\$28,800	\$41,400	44%
Wheeling	\$47,000	\$67,100	43%
Ohio County	\$48,800	\$71,400	46%
Morgantown	\$69,500	\$95,000	37%
Monongalia County	\$64,600	\$95,500	48%
West Virginia	\$47,900	\$72,800	52%
United States	\$79,100	\$119,600	51%

Source: U.S. Census.

### Black Bart Casino

The second location is Willits, CA, which is home to Black Bart Casino. The facility opened in 1996 and features over 200 slot machines. The control group is Ukiah, CA, which is located in the same county as Willits but does not have a gaming venue.

Housing values in Willits saw a 56% increase as compared to Ukiah, which only saw an increase of 30% between 1990 and 2000. Willits saw increases well above the county’s increase of 37%.

### Black Bart Casino Median Housing Values

	1990	2000	Percent Change
Census Tract	\$105,400	\$136,500	30%
Willits	\$82,600	\$129,000	56%
Ukiah	\$113,300	\$146,900	30%
Mendocino County	\$123,900	\$170,200	37%
California	\$195,500	\$211,500	8%
United States	\$79,100	\$119,600	51%

Source: U.S. Census.

### Isle of Capri Casino

Located in Bettendorf, Iowa, the Isle of Capri casino is in a residential area. The casino opened in 1995 and offered 1,000 slot machines, blackjack, roulette, Let It Ride and Caribbean Stud Poker. The control group chosen is Burlington, IA, a similarly sized city located 95 miles southwest of Bettendorf.

Median housing values in Iowa increased significantly during the study period. While the U.S. increased by just over 50%, Iowa saw a gain of 80%. Neither of our study areas saw gains quite as high as the state’s average.

### The Downs at Albuquerque

The Downs at Albuquerque is an operating racetrack that introduced gaming in 1999. The facility offers slot machines and video poker. The control location is Las Cruces, NM, which is located about 200 miles south of Albuquerque. The city does not have a gaming facility.

During the study period, housing values in New Mexico rose 54% which was slightly higher than the national average of 51%. The area directly surrounding The Downs at Albuquerque saw a 47% gain in housing values compared to the city’s increase of 49%. The county in which The Downs is located saw an increase of 50%. For the control groups, city and county median housing values increased by only 34% and 35%, respectively.

These figures indicate that as compared to a location without gaming, such as Las Cruces, property values increased more rapidly in the city and county with gaming facilities available. For the census tract that hosted the casino, property values did not rise as much as those in the city and county generally. However, the difference is extremely slight, and property values in the neighborhood with the racetrack were already significantly much lower than the city or county average before gaming was introduced.

#### The Downs at Albuquerque Median Housing Values

	1990	2000	Percent Change
Census Tract	\$64,000	\$94,150	47%
Albuquerque	\$85,900	\$127,600	49%
Bernalillo County	\$85,300	\$128,300	50%
Las Cruces	\$68,300	\$91,200	34%
Dona Ana County	\$67,300	\$90,900	35%
New Mexico	\$70,100	\$108,100	54%
United States	\$79,100	\$119,600	51%

Source: U.S. Census.

Note: The census tract containing the Downs at Albuquerque from 1990 was split into two census tracts for the 2000 census. The 2000 census tracts have median house values of \$94,500 and \$93,800. The average of the two new census tracts' housing values was used in these computations.

### School Expenditures and Property Values

According to Massachusetts’ legislation, the local Education Fund is to receive 14% of the tax revenues while the Gaming Local Aid Fund is to receive 25%. It can be assumed that a portion of the 25% will be distributed to various community education systems. These additional funds will benefit the school systems, which in turn will increase the value of the community’s housing market. This result, assuming that the school funding generated by casino gaming is accretive to overall school funding, in a self reinforcing system as the byproduct of increased property values is improved funding for schools as they are largely funded by property tax assessments. The following provides some evidence for this effect.

In “Using Market Valuation to Assess Public School Spending”, a working paper available on The National Bureau of Economic Research’s website, the authors concluded that for every \$1.00 increase in per pupil aid aggregate housing values increased by \$20.00. The authors further conclude that even though some of the increase in value reflects lower tax burdens, most of the increase reflects per pupil district expenditures.

Other sources cite that school quality/expenditures are correlated to higher property values.

From the “Federal Reserve Bank of St. Louis Review, May/June 2010” in an article titled “*Nonlinear Effects of School Quality on House Prices*”:

“Unlike most studies in the literature, we find that the price premium parents must pay to buy a house in an area associated with a better school increases as school quality increases. This is true even after controlling for neighborhood characteristics, such as the racial composition of neighborhoods. In contrast to previous studies that use the boundary discontinuity approach, we find that the price premium from school quality remains substantially large, particularly for neighborhoods associated with high-quality schools.”

From a paper entitled *Public School Funding and Performance*, written by John Mackenzie, at the University of Delaware:<sup>8</sup>

“School system quality, indexed by NAEP performance, is correlated with higher property values generally; therefore all residents in a community benefit from strong schools. The direct positive correlation between school taxes and property values is also proved. This positive correlation between local tax per housing unit and property values suggests that most of America is under- investing in public education.”

From a paper entitled *Housing Prices and the Quality of Public Schools: What Are We Buying?*, written by Theodore M. Crone in a Business Review for the Federal Reserve Bank of Philadelphia, September/October, 1998:

“Even though the overall relationship between school resources and student achievement is a matter of controversy, most researchers agree that when extra resources are used wisely, they can enhance the quality of education and thereby contribute to higher house prices. These extra resources might be used to improve academic achievement, but they might also be used to improve other dimensions of school quality, such as the physical attractiveness of the school or the range of extracurricular activities.”

### Summary of Case Studies

In none of the case studies we looked at, either in the neighborhood, the city or the host county, did we find any evidence that property values declined due to the presence of a casino

In the case of Wheeling and Albuquerque, there are no appreciable differences between median housing values in the census tract and the city or county averages. In no case did property values decline.

In two of the four cases (Willits and Bettendorf), property values near the casino did not rise as much as they did in the larger community. However, their growth rates were comparable to their respective control groups. Moreover, in the case of Bettendorf, the facility census tract experienced 61% growth in median house values and in Willits 30%. One factor that has to be kept in mind is that the areas around the facilities are established neighborhoods, whereas new suburban housing development would drive city-wide or county-wide averages up higher than would be expected in established neighborhoods.

It is likely that the degree of positive impact of a casino on property values is primarily related to the specifics of each case and any effect is, in all likelihood, dwarfed by broader economic factors affecting housing values nationally, regionally and at the neighborhood level. As previously discussed, some of the positive effects may be attributed to casinos' funding of school improvement programs.

The impact on housing is much more significant in smaller communities where the housing stock prior to the advent of a casino would be much smaller and where the proportion of single family homes is much greater than in major metropolitan area such as Boston. For example, many of the small communities in and around Foxwoods and Mohegan Sun in Connecticut saw housing shortages as casino employees looked for proximate housing. These communities also experienced illegal and indeed dangerous subdivision of single family homes into apartments and even boarding houses. Given the urban location of Suffolk Downs and the large supply of housing citywide, accessible easily by road and public transportation, we do not expect such problems to arise in the area around Suffolk Downs. We would however expect to see some increase in property values in the immediate neighborhood of the casino as discussed previously.

### Conclusion

The preponderance of evidence suggests that commercial property values increase after the introduction of casino gaming, especially in the vicinity of the casino. This can be attributed to the large influx of visitors to a specific area which provides greater commercial opportunities than would otherwise be available. The evidence for a positive impact on residential property values is less conclusive but in no case did we find evidence that property values in the vicinity of a casino, in a city or county hosting a casino declined.

### **5-37 SCHOOL POPULATION**

### **5-38 EMERGENCY SERVICES AVAILABLE**

### **5-38-01 EMERGENCY SERVICES AVAILABLE**

The Mohegan Sun Massachusetts (MSM) destination resort will be located entirely in the City of Revere (the City), which is admirably served by the men and women of the Revere Police Department and the Revere Fire Department. The resources of those departments and the mitigation of MSM's impacts on their operations are discussed in detail below.

#### **Revere Police Department**

The City of Revere Police Department (Revere PD) is led by Chief Joseph Cafarelli from a recently built, state-of-the-art headquarters located fewer than 1,000 feet from the entrance to MSM. Revere PD also has a new substation just off of Broadway in the business district.

The police force comprises 90 uniformed personnel, including Chief Cafarelli, an Executive Officer, a Senior Captain, three Captains, 12 Lieutenants, 17 Sergeants, and 55 patrol officers. Revere PD also employs 16 civilian personnel. For the current fiscal year ending June 30, 2014, the Revere PD budget is \$9,058,364. Attachment 5-38-02 is an organization chart for the Revere PD.

The current deployment plan for the Revere PD calls for a supervisor and 7 cars during day and evening shifts and a supervisor and 6 cars on the overnight shift from midnight to 8:00 a.m.

Revere PD resources will not be required to address criminal activity relating to the operation of MSM's gaming establishment or relating to games or gaming that occur inside MSM, as the Gaming Act gives exclusive jurisdiction for those items to the Gaming Enforcement Unit of the Massachusetts State Police (MSP) as set forth in G.L. c. 23K, § 6(f). As to all other policing matters, the Revere PD has concurrent jurisdiction with the MSP Gaming Enforcement Unit.

The Revere PD has expressed its intent to exercise its jurisdiction over the destination resort's property. It remains for the Revere PD and the Gaming Enforcement Unit to negotiate and agree upon the memorandum of understanding (MOU) contemplated by the Gaming Act (at G.L. c. 23K, § 6(f)) that will set forth procedures and responsibilities with respect to areas of shared jurisdiction. Topics that remain to be resolved in the MOU include procedures involving (i) first responder calls from MSM; (ii) emergencies occurring within MSM, including in the gaming area; and (iii) criminal investigations involving employees or patrons of a gaming establishment. The Gaming Act invites host community law enforcement to the place officers with the Gaming Enforcement Unit, and the Revere PD has expressed its intent to do so.

Beyond the officer to be assigned to the Gaming Enforcement Unit, the additional demands upon the Revere PD remain somewhat undetermined in advance of opening and operations of MSM, due in part to the fact that the MOU with the MSP has not been completed.

One factor that mitigates the potential for additional police work caused by incidents at the resort is the seriousness with which MSM's operator, the Mohegan Tribal Gaming Authority, approaches security. Many of the members of its security force are former law enforcement or military personnel. MTGA prides itself on having well trained employees who proactively interact with patrons to deescalate and resolve difficult situations. They are also trained to recognize the situations that require police involvement and do not hesitate to bring them in. A sense of the scope of MTGA's detailed planning for incident and emergency response can be gained from the Table of Contents to MTGA's Emergency Preparedness Plan, which is Attachment 5-38-03.

MSM has not asked Revere to take its commitment to public safety and security on faith. Through the Host Community Agreement, MSM is obligated to go far beyond the emergency response plan required by the Gaming Act (at G.L. c. 23K, § 25(j)) to reduce its impact on the public safety services of the City. Specifically, MSM is required to develop, implement and fund a plan that provides any necessary on-site security, fire and life safety services, including on-site emergency medical technicians. In addition, MSM must ensure that all of the on-site security, fire and life safety personnel, and its emergency medical technicians, ambulance services, and emergency management services, work closely with appropriate City departments and agencies. These obligations are set forth in Section 2.D.4 of the HCA, which is Attachment 5-04-01.

Beyond the property boundary, the Revere PD will face some additional demands due to the traffic passing through the City heading to and returning from MSM. This will include responding to traffic accidents involving MSM patrons and conducting anti-OUI operations. The impact of additional resort generated vehicle trips will be mitigated by the millions of dollars MSM will spend on infrastructure improves, as detailed in Section 2.A of the HCA. MSM has further committed to establish a Guaranteed Ride Home program at the resort to complement the extensive training of beverage servers, security, valet attendants and other personnel, which along with liquor service shut-off controls and other best practices, are designed to minimize the hazards of potentially intoxicated persons at the resort. The Guaranteed Ride Home program will help ensure that patrons who may be impaired do not operate a motor vehicle. MSM will prominently advertise and sponsor this service. This obligation, as set forth in Section 2.L of the HCA, will further mitigate the traffic patrol related demands on the Revere PD.

The additional policing impacts of the MSM destination resort are stipulated to and addressed in the HCA, Section 1.A.3 of which provides (emphasis added):

The Project may have an impact on public safety in the City and is expected to require additional expenditures by the City in order to provide police services to

the Project and the areas located near the Property. In addition to the relevant sections of Chapter 23K that address the provision of state and local police services to the Project, the Developer's payments to the City under this Agreement will provide the City with adequate resources to mitigate any such impacts.

The payments from MSM to the City are set forth in detail in Section 2.B of the HCA. They include up to \$33 million of Initial Payments due in annual installments of \$6 million or \$9 million prior to MSM's opening. Upon opening, the City receives the Community Impact Fee, which will never be less than \$25 million per year. Section 2.b.4 of the HCA sets forth the City's intent to use portions of the Community Impact Fee to mitigate the impacts of the project, including an appropriation of \$2 million for the Revere PD in the first year of MSM operations.

### **Revere Fire Department**

As stated on its website, the mission of the Revere Fire Department (RFD) is to “provide high quality emergency and life safety services within the confines of the City of Revere, by maintaining a specialized expertise in and placing highest priority on emergency response to all life safety situations, as well as proactive customer safety services.”

The RFD accomplishes this mission through its 102 members, including seven staff positions (Chief of Department Gene Doherty, a Senior Deputy Chief, and five Deputy Chiefs), 32 Officers (13 Captains and 19 Lieutenants) and 63 firefighters. For the current fiscal year ending June 30, 2014, the Revere FD budget is \$8,377,444. Attachment 5-38- 04 is an organization chart for the Revere FD.

This force is deployed from four active fire stations, including one fewer than 1,000 feet from MSM's main entrance. This station on Revere Beach Parkway houses both an engine company and a ladder company as well as a Deputy Chief. The Revere FD's other equipment includes three additional engine companies and another ladder company housed at the other three stations. Line operations are conducted through four groups, each of which is led by a Deputy Chief as officer in charge and includes 23 or 24 Officers and firefighters per shift.

The Revere FD is a member of MetroFire, an association of fire departments in the metropolitan Boston area, through the Revere FD has mutual aid relationships nearby municipalities and the Massport Fire Department to provide necessary support or coverage in the event of a major fire event at MSM.

The principal impact of MSM operations on the Revere FD will be with respect to medical calls. While ambulance service in Revere is provided through a contract with the Cataldo Ambulance company, the Revere FD sends an engine company to all ambulance calls. Data reported to the Massachusetts Fire Incident Reporting System indicate that about two-thirds of the department's 8,500 calls each year are rescue or emergency medical services calls.



However, MSM-related emergency medical calls to which the Revere FD will be required to respond will be limited to those occurring away from the resort itself, such as in automobile accidents involving MSM patrons. As noted above, the HCA requires MSM itself to provide on-site life safety services, including emergency medical technicians.

Moreover, as with policing impacts, MSM and Revere have stipulated in the HCA that development and operation of the destination resort is expected to require additional expenditures by the City for public safety and municipal services such as fire and emergency medical responses. , the City intends appropriate \$2 million for the department out of the Community Impact Fee that MSM will pay the City in the first year of operations. As noted above, the Community Impact Fee will never be less than \$25 million per year.

### **Revere Ambulance Service**

As noted, the City does not have its own ambulance corps. Like many North Shore cities and town, it utilizes a private firm, Cataldo Ambulance, to provide any necessary ambulance services. As reported by Fire Chief Doherty, the City's contract with Cataldo requires the company to respond to calls within 8 minutes. Cataldo directly bills the patient (or his or her insurance company), and the city incurs no cost. In addition, as seen above, the HCA requires MSM to provide on-site EMTs and to arrange ambulance services. Accordingly, there is no fiscal impact on the City as a result of additional ambulance service calls arising out of MSM operations.

## **G. OTHER**

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## 5. OTHER

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### **Legal Framework**

In determining whether a community is a surrounding community, the commission . . . will evaluate whether: . . . The community will be significantly and adversely affected by any other relevant potential impacts that the commission considers appropriate for evaluation based on its review of the entire application for the gaming establishment. 205 CMR 125.01(2)(b)(5)

### **Executive Summary**

N/A

**A. COMMUNITY PETITION**

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No relevant documents

**B. APPLICANT RESPONSE**

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No relevant documents

**C. RPA ANALYSIS**

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No relevant documents

**D. DEIR ANALYSIS**

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No relevant documents

**E. CONSULTANT ANALYSIS**

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No relevant documents

**F. APPLICATION**

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No relevant documents

**G. OTHER**

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No relevant documents

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## 6. POSITIVE IMPACTS

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### Legal Framework

In determining whether a community is a surrounding community the commission may consider any positive impacts on a community that may result from the development and operation of a gaming establishment. 205 CMR 125.01(2)(c)

### Executive Summary

See below.

### A. COMMUNITY PETITION

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No relevant documents

### B. APPLICANT RESPONSE

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The resort's impact on the regional job market, small businesses, and the local economy are overwhelmingly positive. MSM has committed to using best efforts not only hire resident 75% of its permanent workforce from communities within 15 miles of Revere City (including the City), but to purchase no less than \$50 million annually from local vendors. Revere Host Community Agreement §§ 1.E.2, 1.H.2. MSM also will stimulate small business growth throughout the region through its unique Points Partnership Program. These purchasing commitments will place a particular emphasis on utilizing minority, veteran and women-owned business enterprises. Id.

With local residents constituting three quarters of MSM' s total permanent workforce, the resort's employees will bring well-paid jobs and benefits back to their communities, spending money locally, increasing the tax base and creating positive multiplier effects throughout the region.

**C. RPA ANALYSIS**

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No relevant documents

**D. DEIR ANALYSIS**

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No relevant documents

**E. CONSULTANT ANALYSIS**

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No relevant documents

**F. APPLICATION**

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No relevant documents

**G. OTHER**

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No relevant documents