

3/1

March 1, 2014

Massachusetts Gaming Commission  
84 State Street, 10<sup>th</sup> Floor  
Boston, MA 02109

Delivery by Adobe PDF via email to [mgccomments@state.ma.us](mailto:mgccomments@state.ma.us)

**Subject: MGM Springfield/Memorial Ave West Springfield**

To whom it may concern,

LivableStreets Alliance would like to express our strong desire and support for the MGM Casino project in Springfield to include extensive multi-modal transportation improvements as part of its transportation mitigation efforts. In particular, this project is an opportunity to greatly increase the connectivity and accessibility between West Springfield and downtown Springfield for pedestrians and bicyclists.

LivableStreets Alliance is a Boston-based organization that promotes complete streets as a way to improve accessibility and livability, and as a way to support economic development in our urban areas. Complete streets are designed to serve everyone, no matter how they choose to travel, whether it be by walking, bicycling, taking transit, or driving an automobile. By rethinking and redesigning our streets, we not only give people more options about how to get around, we can also reduce existing automobile congestion and future demand for automobile trips.

This latter point is particularly important to the MGM Springfield project. One of the main selling points of the MGM proposal is that it is in one of the most densely populated urban areas in the Pioneer Valley, one that already provides a variety of options for getting around, including Amtrak, PVTA, and regional buses, as well as convenient roadway access in a prominent downtown location. We strongly agree with comments by MassDOT, MEPA, and the PVPC that this project should identify and rectify barriers to walking and bicycling in the area, particularly along routes that would bring people to and from the development. These types of improvements would reduce the demand for automobile trips to and from the development, lessening the impact on roadway congestion and the amount of off-street parking that would need to be built.

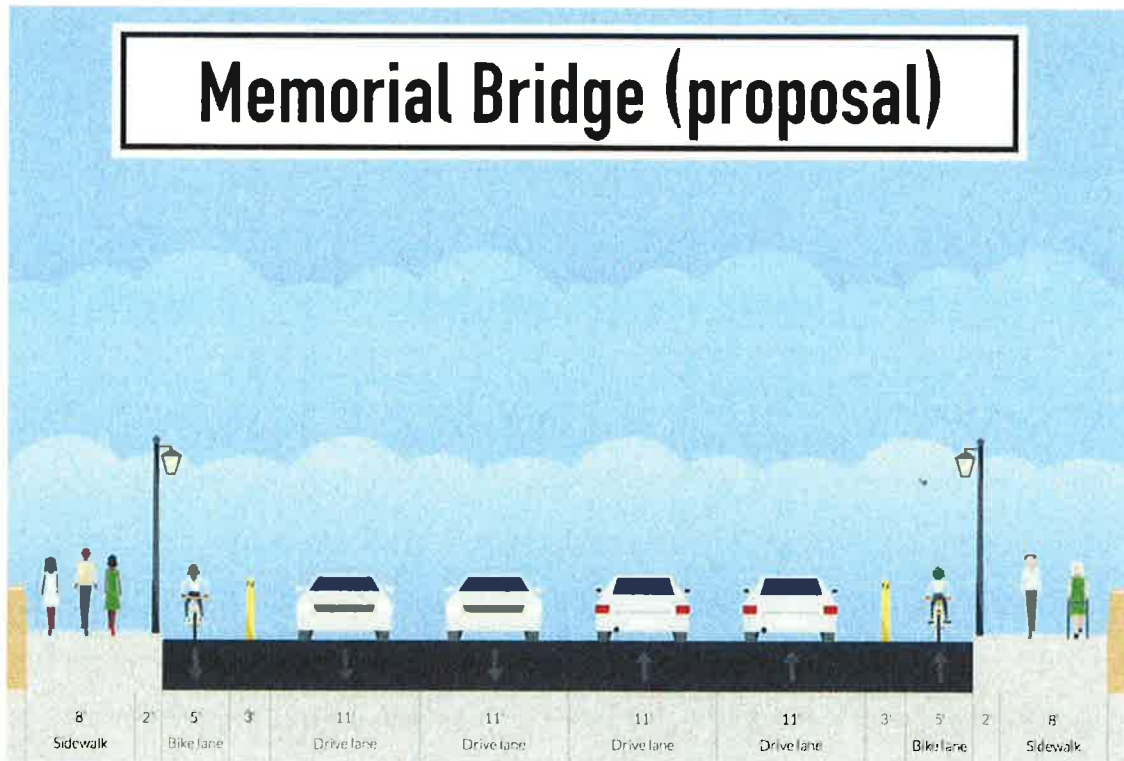
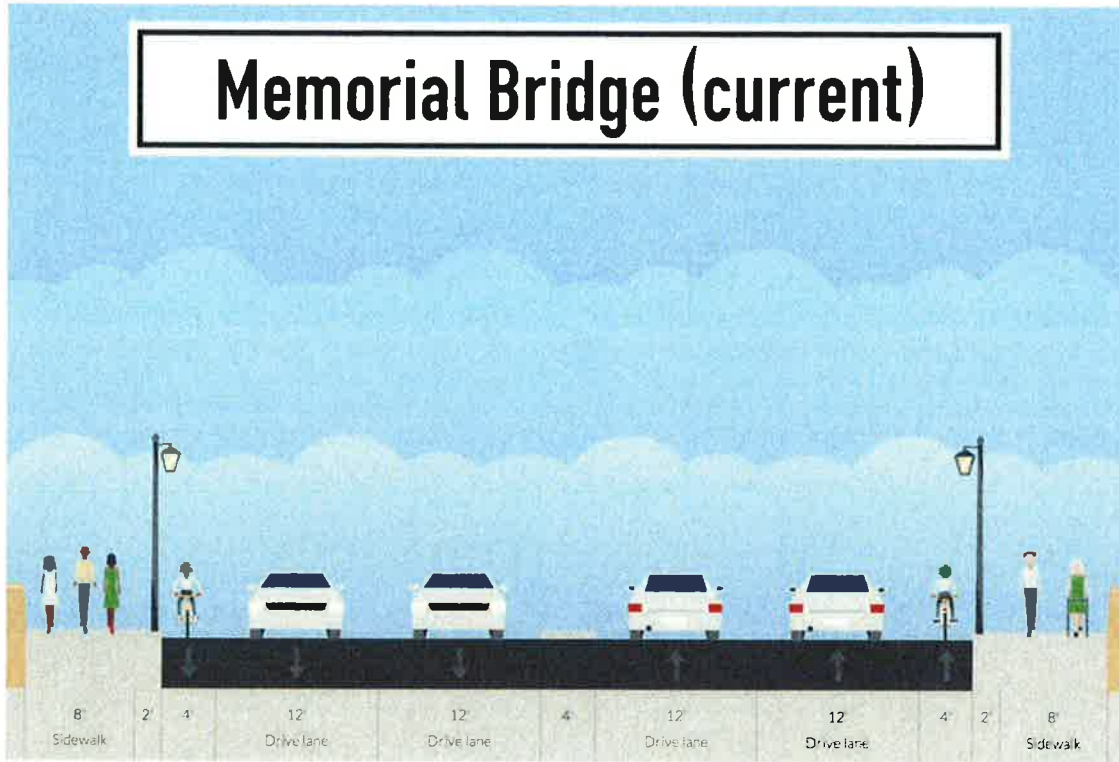
One particular route that could be greatly improved for walking and bicycling is Memorial Ave in West Springfield and the Memorial Bridge, feeding into downtown Springfield. This is a key gateway into Springfield and is only a few blocks away from the MGM site, and of all the routes into the city is the one that could most easily be made much more pedestrian and bicycle friendly.

These improvements could start by reconstructing Memorial Ave from Union Street to the rotary as a true complete street, with generous sidewalks, street trees, highly visible crosswalks, countdown pedestrian signals, and cycle tracks or bike lanes, along with new pavement and upgraded traffic signals.

These types of improvements would continue through the Memorial Ave rotary, for which MassDOT currently has a project to reconfigure with wider sidewalks, ADA-compliant ramps, crosswalks, new lane markings, and signage. This existing project will fill a key gap in the pedestrian network between West Springfield and Springfield where there are currently no curb ramps or crosswalks. It will also improve efficiency and safety of the rotary for automobiles, similar to the roundabout-style improvements at the South End Bridge rotary in Agawam. All that would need to be added to that plan is improved bicycle accommodation through the rotary. This could be done by widening sidewalks to the maximum extent in order to include a cycle track around the outside of the rotary, and including bicycle ramps at the ends of the project to allow bicyclists to transition between the rotary cycle track and Memorial Ave and the Memorial Bridge. (We are happy to provide examples of this type of design if needed.)

Continuing onto the Memorial Bridge, we would ask MassDOT to enhance bicycle accommodation, preferably by reallocating space to add cycle tracks along the bridge (either sidewalk or roadway level), or if that is not possible, by restriping the bridge with buffered or traditional bike lanes, along with proper guidance at the intersections at each end. Cycle tracks and/or bike lanes should also then be added on one or more routes from the Memorial Bridge to the project site. For example, the current curb to curb width of the bridge is 60'. By removing the flush median and restriping the roadway, there is currently room for 4 11' travel lanes (2 in each direction, as there is today) and an 8' buffered bike lane in each direction (5' bike lane + 3' hashed buffer). If some sort of physical separation were added in the buffer zone, for example plastic posts or a raised curb, these bike lanes could be converted into cycle tracks.

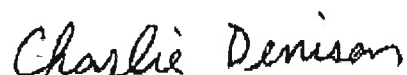
Here is a before and after illustration of the roadway changes that could be made to the bridge:



MGM Springfield will clearly result in an increase in pedestrian and bicycle demand along the Memorial Avenue/Memorial Bridge route linking downtown Springfield with West Springfield. Casino employees and patrons residing in the Merrick section of West Springfield could easily choose to walk/bike to the development site if safe and convenient infrastructure were provided. The residents of the 52 market rate apartment units proposed as part of the MGM development may also seek to cross the river to West Springfield for work or to patronize businesses located in the Century City Plaza, not the least of which being Big Y and PriceRite, the closest two significant grocers to downtown Springfield. (Certainly other residents of the downtown area who currently walk to these supermarkets would benefit from any improvements as well.) The improvements described for walking and bicycling would close gaps in the roadway network between West Springfield and Springfield, facilitating increased pedestrian and bicycle use while also accommodating the increase in demand as a result of the MGM Springfield development. We hope that you will support these efforts to maintain the bridge both literally and figuratively between these two communities as part of the MGM Springfield development.

Thank you for considering our input as this project moves forward. If you have any questions on the above comments and suggestions, please contact Charlie Denison, Advocacy Committee Chair, LivableStreets Alliance, who may be reached at 617.852.6125 and [charlie@livablestreets.info](mailto:charlie@livablestreets.info).

Sincerely,



Charlie Denison  
Advocacy Committee Chair

CC:

Mr. Michael Mathis, President, MGM Springfield [mmathis@mgmresorts.com](mailto:mmathis@mgmresorts.com)

Mr. Charles Irving, Davenport Companies [cirving@dnpt.net](mailto:cirving@dnpt.net)

Mr. Kevin Dandrade, Principal, The Engineering Corp [kdandrade@theengineeringcorp.com](mailto:kdandrade@theengineeringcorp.com)

Mr. Frank DePaola, Highway Division Administrator, MassDOT [frank.depaola@state.ma.us](mailto:frank.depaola@state.ma.us)

Mr. Albert Stegemann, District 2 Highway Director, MassDOT [albert.stegemann@state.ma.us](mailto:albert.stegemann@state.ma.us)

Mr. Lou Rabito, Complete Streets Engineer, MassDOT [luciano.rabito@state.ma.us](mailto:luciano.rabito@state.ma.us)

Mayor Edward C. Sullivan, Town of West Springfield [esullivan@west-springfield.ma.us](mailto:esullivan@west-springfield.ma.us)

**Bratton-Davies, Marianne (MGC)**

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**From:** Ken Parsons <kjpars@crocker.com>  
**Sent:** Monday, March 03, 2014 11:48 AM  
**To:** MGCcomments (MGC)  
**Subject:** Big E

Gentlemen;

As a exhibitor and supporter of the Big E for more than 50 years I want to express my concern that your decisions could affect it's continued successful operation. The Big E is one of the very few if not the only State Fair type of fair in this country operating without direct state support. The Big E by comparison with astute management shares a portion of ticket sales with the town of West Springfield. It also continues to support industry and agriculture with an emphasis on youth programs through the year. Being placed in a competitive disadvantage could threaten the Big E's ability to continue to operate in this manner.

Thank you,  
Kenneth Parsons  
140 Mill Valley Rd.  
Hadley, MA 01035

3/3

**Bratton-Davies, Marianne (MGC)**

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**From:** Rosemary Tracy Woods <artforthesoulgallery@gmail.com>  
**Sent:** Monday, March 03, 2014 3:30 PM  
**To:** MGCcomments (MGC)  
**Subject:** Small Business - Support MGM

I am a small business and I strongly support MGM. I think it would be great and an added attraction for travelers to the area., as today, what does Downtown Springfield have to offer? A few places or points of interest, but that is not attracting the customer base that is needed to sustain small business.

I know that local artist would benefit, MGM has been very active in the community, and I think they will continue to partner with community.

--  
Rosemary Tracy Woods  
Creating Art in Downtown Springfield  
413-301-6314  
Purchase 3 books from the Springfield Heritage Series and receive a free totebag

3/4

**Bresilla, Colette (MGC)**

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**From:** MGC Website <website@massgaming.com>  
**Sent:** Tuesday, March 04, 2014 9:25 AM  
**To:** MGCcomments (MGC)  
**Subject:** Contact the Commissioner Form Submission

**Name**

Deborah Manning

**Email**

[debmanning29@gmail.com](mailto:debmanning29@gmail.com)

**Subject**

Springfield location

**Questions or Comments**

Mass Gaming Commission

To whom it may concern,  
I'm writing to express my concern about the location of the western MA casino project in downtown Springfield. As a resident of Longmeadow, I am very concerned about the negative impact I think a casino would have on our town as well as the city. I am not against casinos in general but I am very opposed to one being built so close to my home. I had no say, as I am not a resident of Springfield, about something that will most certainly affect the life of me and my family. Of all the possible locations in western MA, I don't think picking the most congested area of Springfield is a smart choice. Traffic is already a major issue heading north on rt 5 and 91N without a casino right off 91. I'm also concerned about increased crime and the effect on gambling addictions in the area which is a very real problem in the greater Springfield area. Drunk driving is another concern, will MGM be serving free drinks like many other casinos? There are many possible solutions to Springfield's problems, but unfortunately I don't believe building a casino here is one of them. In fact, in the long run, I believe building a casino in downtown Springfield will create much bigger problems that will forever change the character of the city and surrounding towns. I am completely opposed to a casino being built in downtown Springfield.

Sincerely,  
Deborah Manning

3/4

**Bresilla, Colette (MGC)**

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**From:** Brenda Brown <Brenda.Brown@bhninc.org>  
**Sent:** Tuesday, March 04, 2014 9:03 AM  
**To:** MGCcomments (MGC)  
**Subject:** Applicant notification

I just realized I could email my concerns regarding Casino in Springfield, MA

Following are my concerns:

South End is not appropriate for Casino or any area of Springfield.

There are large number of tenants that reside on side streets that will be affected by Casino. These tenants do not have ability to move to other apartments that will be in their price range. Where will the go????? There few low income or no apartments left in Springfield for poor or low income. The Springfield hotels are filled with homeless and there have been no plans to move them; nor is there construction for low income apartments. Building owners are highly likely to take action to have tenants removed by selling the building to be made into Condo for major corporations to use or current landlords will reconstruct building for condo, or other money making projects. This behavior will also take place when I 91 is reconstructed. Allegedly there are so many buildings destroyed by hurricane but large number rebuilt with restaurants and public health buildings like Day Care, health clinics.

It is unfortunate that Palmer where the land is open, spacious, no building to be destroyed, place where casino, parking, apartments for employees and condo, hotel rooms are available for the more fortunate can be built. Easy access from I 90. Peter Pan can provide transportation for employees who reside from other local communities to Casino. Perhaps the Gaming Commission can encourage open land acreage to set up for Casino but not destroying cities that have so many unaddressed issues that will be worsen by Casino presence.

This email is from Brenda Brown whose position is Crisis Clinician  
[Brendabrown112@comcast.net](mailto:Brendabrown112@comcast.net) please use for reply.



3/4

**Bresilla, Colette (MGC)**

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**From:** MGC Website <website@massgaming.com>  
**Sent:** Tuesday, March 04, 2014 2:45 PM  
**To:** MGCcomments (MGC)  
**Subject:** Contact the Commissioner Form Submission

**Name**

Amy Appell

**Email**

[Discodaisy411@comcast.net](mailto:Discodaisy411@comcast.net)

**Subject**

Really?!

**Questions or Comments**

How is it that you wouldn't want a casino in your neighborhood, yet you have made it your mission to put one in ours? You are increasing crime and addiction for our children...is that ok with you, seeing as they aren't your children? I hope that by pretending Springfield is your city, you will make different decisions....

3/5

161 Longhill Street  
Springfield MA 01108  
March 5, 2014

State Gaming Commission  
84 State Street, 10<sup>th</sup> floor  
Boston MA 02109



RE: MGM plans for Springfield casino

Dear Madam/Sir:

In your consideration of MGM plans for a casino in Springfield, please keep in mind the historical heritage of Springfield. The city has been a major player in USA history, as a visit to our history museum will remind you. Part of its historical heritage are certain buildings currently threatened by MGM's casino plans. In particular there are new structures proposed at the sites of the 1846 Union House at 1132-1142 Main Street and the 1907 YWCA building at 22-30 Howard Street. These buildings should be spared; they could easily be incorporated into MGM's plans, in a way similar at least to their proposal for our magnificent Armory.

Please keep in mind that neighboring Connecticut casinos saw their revenues drop by a third last year.

Please keep in mind the priceless architectural treasures lost across the Commonwealth, due to the demolitions of Progress, the sacrificial victims to [temporary] boosts to the economy; there have been so many lost treasures never to be replaced.

Hoping that you will be remembered as guardians of our civic fabric and not the servants of the corporate wrecking balls, I am

Sincerely yours,  
  
Allen Agnitti

cc.: Bruce Stebbins  
City Counselor Kenneth Shea

3/12

**Bresilla, Colette (MGC)**

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**From:** NoCasino Springfield <nocasinospringfield@gmail.com>  
**Sent:** Wednesday, March 12, 2014 9:30 AM  
**To:** Crosby, Steve (MGC); McHugh, James (MGC); Cameron, Gayle (MGC); Zuniga, Enrique (MGC); Stebbins, Bruce (MGC); Blue, Catherine (MGC); Ziemba, John (DOT); MGCcomments (MGC); Driscoll, Elaine (MGC); Gale.Candaras@masenate.gov; Brian Ashe  
**Subject:** False Endorsement

To the members of the MA Gaming Commission:

We would like to point out to you a gross misrepresentation that was made by Mr. Gregory Schmutte of American International College at the West Springfield Surrounding Community Hearing.

Excerpt from the MA Gaming Commission transcript for Monday March 3 Public Hearing in West Springfield MA ( p 143):

**"MR. SCHMUTTE:**

**Good evening, Commissioners. My name's Gregory Schmutte. I'm a vice president for Institutional Effectiveness at American International College and I'm here to lend my support personally, as well as speak on behalf of the area colleges in support of MGM coming to Springfield and I will be brief."**

**- p 147**

He then went on to name the 8 colleges.:

- American International College
- Springfield College
- Bay Path College
- College of Our Lady of the Elms College
- Springfield Technical Community College
- Holyoke Community College
- Westfield State University
- Western New England University

When we called three of those colleges ( AIC, Elms, and Bay Path) and asked if they had endorsed the project in any way, two of their public relations offices adamantly denied taking any position on the issue whatsoever and had no knowledge of Mr. Schmutte's claim. Only AIC endorsed the project and is hoping to be involved in a training program with MGM along with STCC. The others have no interest in taking a position on the project.

So, we ask you to amend the record and disregard any notion that all the local colleges are endorsing the casino project.

Thank you for your time,  
The members of NoCasinoSpringfield  
(Submitted by Ted Steger, Email Administrator)

3/16

**Bresilla, Colette (MGC)**

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**From:** rorossen@aol.com  
**Sent:** Sunday, March 16, 2014 8:49 AM  
**To:** MGCcomments (MGC)  
**Subject:** MGM

This has been quite a learning curve for all of us. West Springfield's dash to the polls without enough time to get the word out has stuck them in a dangerous position. Yes, they will feel the impact of an MGM more than Springfield itself. You know as well as me, the agreement with the BIG E, and with Six flags up the street made Hard Rocks the number one location. With Foxwoods tumbling in CT, We need a company financially fit like a Hard Rock even if it's not located in West Springfield. I think with the Gaming commissions' and everyone's else's mistakes made, we should not allow an MGM. Springfield 's Mayor Sarno has not made Springfield a safe destination. Will they put barbed wire fence around it for security. Trust me, if I want a night out in a Casino, it won't be in Springfield. PS" YOU ASK FOR COMMUNITY SUPPORT YET NEVER REPLY. Awesome set-up you guys have.

Ronald O Rossen  
West Springfield

Sent from Windows Mail

3/25

**Bresilla, Colette (MGC)**

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**From:** Vinson Stringer <vstringer@broughtonconstruction.com>  
**Sent:** Tuesday, March 25, 2014 12:41 PM  
**To:** MGCcomments (MGC)  
**Cc:** msmith3@mgmresorts.com  
**Subject:** FW: Written Testimony/Support For MGM Springfield

Mr. Michael Mathis, I received the invite to support you and MGM Springfield before the Commission on April 1, 2014. The distance and schedule has once again prevented me from making an appearance in person. Please accept the written testimony below which was previously forwarded. With all sentiments, opinions, observations and conclusions contained in the written testimony still a direct and accurate reflection of mine. You have my permission to submit the written testimony to the Commission on April 1, 2014. All the best as you proceed through the process. Should there be a need to contact me. I will respond promptly. Anticipating one day when the schedules allow. To meet you and MGM Springfield staff. THANKS!!!!

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**From:** Vinson Stringer [mailto:vstringer@broughtonconstruction.com]  
**Sent:** Tuesday, March 04, 2014 8:01 AM  
**To:** 'mgccomments@state.ma.us'  
**Cc:** 'msmith3@mgmresorts.com'  
**Subject:** Written Testimony/Support For MGM Springfield

Broughton Construction is a MBE General Contractor doing commercial construction in the Mid Atlantic region. One of the company's past project performance is the execution of interior scopes of work on the first 4 floors in the Gaylord Hotel. The Gaylord Hotel is located at National Harbor in Prince Georges County Md. This location is the site of the new MGM Grand.

Having followed the process for MGM Grand to obtain permission from the Md. Gaming Commission. I attended all public hearings leading up to the award. During that time frame I have been impressed with the outreach for employment opportunities with MGM Grand and participation for construction jobs. MGM Grand has shown and demonstrated a commitment to local hiring for entry level positions with upward mobility to professional employment opportunities throughout the company. Their show of concern for the community, schools and non profits in the area is and has been an act of good faith action from a corporate neighbor.

As a company poised to participate in the building of the new MGM Grand at National Harbor and vetted by MGM Grand. The Broughton Construction Company has been more than pleased with the way MGM Grand personnel. Has taken the time to make sure Broughton Construction has everything needed to qualify for construction opportunities at National Harbor. The care and attention to detail shown by MGM Grand was open and made it possible for all local and small businesses to take advantage of the limitless employment and contracting opportunities.

I am unable to make a public appearance in support of MGM Grand in Springfield. However, let this serve as notice to the many who will benefit from MGM Grand and their commitment to Springfield. Should there be a need I can be reached anytime. If not you have my word. The citizens of Springfield will be greatly appreciative of the commitment by MGM Grand to those who live, work and play in Springfield.

Vinson Stringer  
Business Development Coordinator  
**BROUGHTON CONSTRUCTION COMPANY, INC.**



3/26

**Bresilla, Colette (MGC)**

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**From:** MGC Website <website@massgaming.com>  
**Sent:** Wednesday, March 26, 2014 8:20 AM  
**To:** MGCcomments (MGC)  
**Subject:** Contact the Commissioner Form Submission

**Name**

Corinne Squier

**Email**

[cas.1953@verizon.net](mailto:cas.1953@verizon.net)

**Phone**

(413)348-1147

**Subject**

Springfield Ma

**Questions or Comments**

As a concerned citizen of western Ma, that drives through Springfield everyday I don't think that Springfield can handle the traffic that would be generated by a casino. You can drive anywhere in Springfield and there are violations all over the place. The people crossing streets don't watch for traffic they just cross when and where they want. A casino in Springfield is just asking for trouble

## Balcom, Darian (MGC)

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**From:** Ted Steger <tsteger@gmail.com>  
**Sent:** Monday, March 03, 2014 9:02 PM  
**To:** MGCcomments (MGC); Crosby, Steve (MGC); Blue, Catherine (MGC); Ziemba, John (DOT); Zuniga, Enrique (MGC); Cameron, Gayle (MGC); McHugh, James (MGC); Stebbins, Bruce (MGC)  
**Subject:** Electronic version of PPT  
**Attachments:** MGC PPT\_030314.pptx

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Commissioners:

Thank you again for coming to Western Mass to hear our concerns about casinos and the process. I'm attaching a PPT that contains the links to the source material in the presentation.

As I'm sure you noticed, the casinos supporters all had a direct financial interest in the proposal, and did their best to ingratiate themselves with MGM. We the people oppose the casino, and we hope this presentation will help you to see the light as well.

I ask you to pay special attention to slides 24-25 which contain some common sense regulations to limit problem gambling.

Thanks for your time and attention,  
Ted Steger  
Longmeadow, MA

## Easy Money?: Why Springfield is better off without a convenience casino

Rizzuto: *We have a question from Walter, of Ludlow, who asks, "How can MGM expect to compete in an area with six casinos - two in Rhode Island, two in Connecticut, two in New York State - in a 90-mile radius?"*

Mathis: **This casino is really for Western Mass.**

This is really the battleground for customers who would go to the tribal casinos. We're confident about the business plan and that the MGM brand is strong enough that we're going to be able to keep business here.

-Interview of MGM Springfield President Michael Mathis ending the charade of the "destination resort" casino

Prepared for the Mass Gaming Commission by NoCasinoSpringfield

1

## Five Criteria for Granting a Casino Monopoly in Western Mass

- Mitigation
  - Community Support
  - Responsible Gambling
- Revenue
- Economic Development / Jobs
- Building and Site Design
- Overview

2

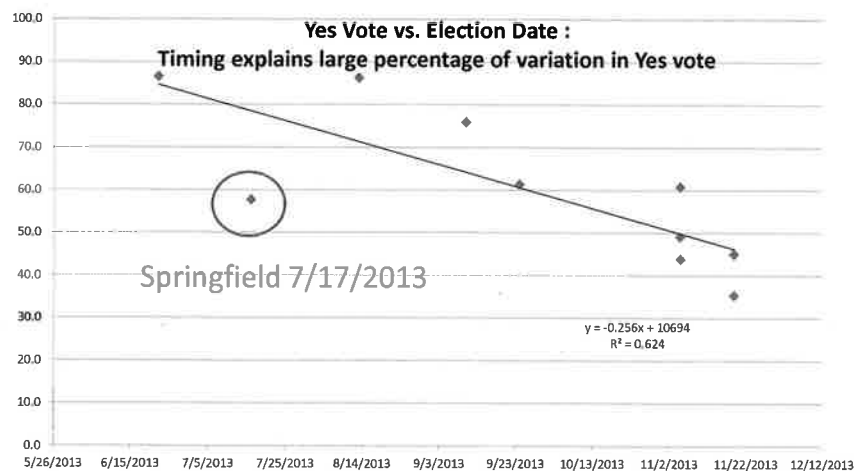


## Community Support: Does Greater Springfield really want a casino?

- Referendum in July 2013 was not meant to gauge Springfield's preference as to whether to have a casino, it was engineered to elicit a yes vote - and it still was the lowest passing vote in the state
  - Ballot extremely one sided with not one mention of costs or negative impacts of a casino
  - Timed for low turnout by anti-casino voters (Second lowest turnout percentage in the state at 24.7%)
  - Overwhelming spending advantage by yes side, but still was the lowest passing margin in the state.
  - Mayor used questionable tactics to coerce City Employees into a yes vote.

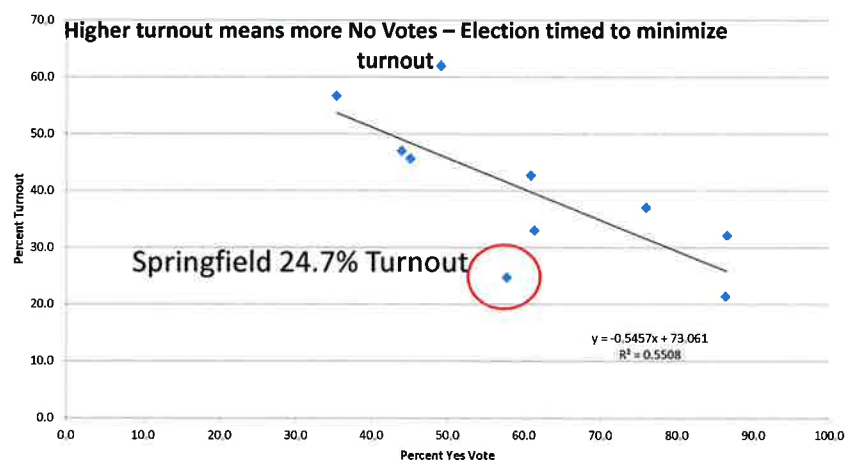
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## Community Support: The more people learn about casinos the less they like them



4

## Community Support: Turnout Matters



5

## Community Support: Bought and Paid for

- MGM's [campaign finance report](#) and [real estate transactions](#) demonstrate the strategy of buying off key constituencies
- Used MGM Maryland employees and mini-vans with MD plates to drive people to the polls
- Local Media conflicts limited true public debate prior to the referendum

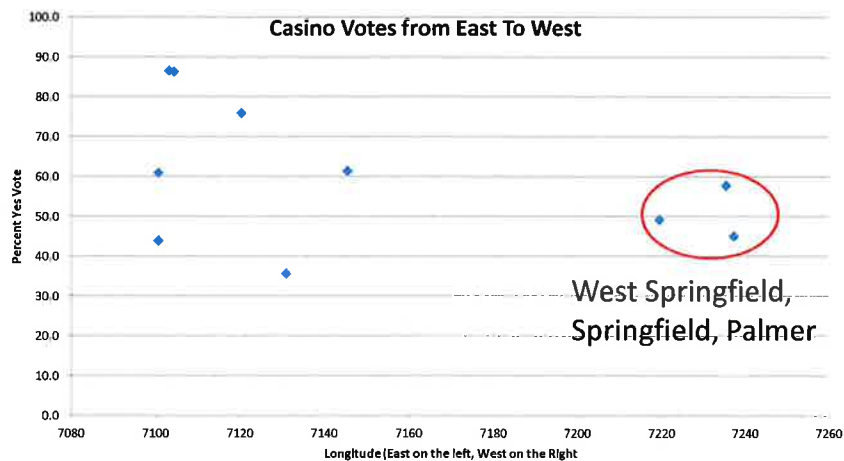
6

## Community Support: More WM residents vote against casinos than for them

- Taken together, Western Mass residents have opposed casinos at the ballot box by a margin of almost 2000 votes (West Springfield, Springfield, Holyoke, Palmer)
- East Longmeadow Town Meeting voted by at least a 20 point margin to oppose any casino in Western Mass
- Longmeadow Town Meeting voted by at least a **60** point margin to oppose a casino in Springfield
- Longmeadow School Board voted 7-0 to oppose a casino in Springfield

7

## Western Mass: Clearly the least enthusiastic region



8

## Western Mass: Clearly the least enthusiastic region

- Western Mass Mitigation deals woefully inadequate – tiny North Stonington, CT gets \$885,000/yr but says it doesn't come close to covering costs
- Repeal the Casino Deal Petition Signatures:
  - Springfield 1490
  - Longmeadow 1206 (10% of registered voters!)
  - West Springfield 760
  - Northampton 667
  - Amherst 797

9

## Is Springfield Enthusiastic about having MGM here?

- 3 “big name” events held by MGM
  - Pit Bull – Not sold out despite MGM buying large chunk of tickets
  - Professional Bull riding (A huge number of empty seats)
  - Boyz II Men (“The event drew 1,600 fans to the 2,600-seat hall”)

10

## Responsible Gambling

- MGM proposes to have an “on-site” treatment facility for gambling addicts
  - This is equivalent to AA holding meetings at the corner bar
- 30-60% of gambling revenue comes from [problem gamblers](#)
  - What is the casino industry’s motivation to curb problem gambling?
- The recent statement by Mark Vander Linden that problem gambling rates may fall after the introduction of casinos is contradicted by every major study - the majority of which show problem gambling rates double within 10 miles of a casino
- Iowa’s problem gambling rates tripled after introducing casinos. Let’s not make the same mistake
- Accessibility is the [primary driver of problem gambling](#). The best way to reduce problem it is to keep casinos out of our state

11

## Revenue – but what about costs???

- According to MGM’s “best case scenario”, Western Mass residents will lose \$192.7 million per year
- That is \$192.7 million /year (\$57 / visit) that is not spent at local restaurants, and businesses.
- ““The casino industry does not have an impact on economic growth at the state level,” concludes a 2007 study by economics professors [Douglas Walker](#) of the [College of Charleston](#) and [John Jackson](#) of [Auburn University](#). "The average state should not expect any long-term growth effects from legalizing [casino gambling](#).”

12

## Revenue – but what about costs???

- What about Costs?
  - “Costs to government go up as gambling addiction rises (doubling within casino feeder markets), bankruptcies climb (18 to 42 percent higher in area around casinos, Kindt said) and crime rates go up (about 10 percent a year). That means costs to government of \$3 for every \$1 in gambling revenue.
  - Lost sales tax revenue, lost income tax revenue, lost lottery revenue
  - Increased welfare, social safety net costs
  - Increased embezzlement: 400% increase in embezzlement cases near CT Casinos
  - Explains why almost all casino revenue estimates for states that introduce them are wildly over estimated (see Ohio Case Study slide)
  - Does that sound like a good deal for the state?

13

## Economic Development: Jobs

- A question never asked by the MGC / City of Springfield: How many jobs will be lost because of MGM Springfield?
  - Most analyses “fail to consider the costs of casino gambling. Research by John Kindt, a business professor at the University of Illinois, concludes that nationwide, 1.5 jobs are lost for every job casinos create.”
  - That means about a net loss of 1500 jobs
- Studies have shown that **casinos do not lower the unemployment rate** – they transfer jobs from the businesses shutting down around the casino. The net number of jobs doesn’t change.

14

## Economic Development?

- Under its optimistic projections submitted to the MGC in their application, MGM projects 42% of its visitors (Western Mass residents) to spend \$0 outside of the casino
- In the same application, MGM projects 50% of its visitors to spend just \$4 per visit outside the casino
- Does this sound like a recipe for economic development?
- A 2007 survey found that just 17% of economists believe a casino produces more benefits than costs

15

## Economic Development: The Costs

- MGM projects \$53.5 million in spending outside the casino
- With more realistic "convenience casino" assumptions (as in Detroit where 80% of visitors come from neighboring counties) that figure drops by at least 20%
- Convenience casinos create a "huge money sucking vacuum", not an engine
  - Casinos use restaurants, etc. as loss leaders to undercut local competition, forcing business closures and job losses
- There's a reason Monaco, Aruba and other countries restrict or forbid locals from gambling in their casinos

16

## Economic Development: The Human Costs

- ~20,000 additional problem gamblers in Greater Springfield based on gambling addiction rate doubling within 10 miles of a casino
- In CT, 4 people were killed by drunk drivers who had their last drink at Mohegan Sun.
- According to a Spectrum Gaming report, the State Police Barracks near Mohegan/Foxwoods consistently leads the state in DUI investigations with 1/3 more than the next highest troop.
  - “In Ledyard, nearly one out of four arrests involved casino patrons. In North Stonington, the figure was nearly one out of three. And in Montville, it was one of five.”
- Fatal accidents up sharply near the casino, down elsewhere in the state
- Casinos preferentially prey on the poor
  - “Ten percent of those who live in the most disadvantaged neighborhoods are problem gamblers as compared to about one percent of those who live in the least disadvantaged neighborhoods”
- Increase in public corruption convictions 1-2 years before gambling introduced to the state

17

## Building and Site Design

- Every precedent shows that placing a casino in an urban setting is a long-term loser for the city (Detroit, Atlantic City).
- Impact of I-91 construction + casino construction will cost local business and residents time and money
- DEIR was completely inadequate as it did not address the highest problem area along I-91 Exits 1-3
- DEIR estimates of No-Build case flawed

18



## Overview

- The best option in terms of DUI rates, crime, traffic, gambling addiction, public health, income inequality and long-term well being of the state of Massachusetts is to not place a casino in Springfield
- Let's look at what has happened in other states

19

## Case Study: Illinois

- Riverboat gambling introduced in 1991 – 10 licenses
- Video Gaming added in 2009
- Online lottery sales added
- Currently attempting to add even more casinos
- Despite all these casinos, how is Illinois' fiscal and economic situation:
  - 11<sup>th</sup> worst debt per capita
  - 9<sup>th</sup> largest budget deficit
  - 10<sup>th</sup> highest unemployment
- Legislature is so addicted to cannibalistic revenue they keep going back to what is killing them

20

## Case Study: Ohio

- Drastically lower revenue than projected.
  - The Ohio Department of Taxation estimated in 2009, before the vote, that the casinos would generate \$1.9 billion in annual tax revenue.
  - The state hired Spectrum Gaming Group of Atlantic City, N.J., in 2011 to predict casino revenue, and the company determined that it would be about \$1.1 billion.
  - Kasich's revenue estimate of just under \$1 billion was the most conservative at any point since the casino proposal was put before voters in 2009. And it was still high.
  - The four casinos are on pace to gross about \$868 million this fiscal year, \$90 million less than what Gov. John Kasich's proposed budget anticipated in the spring.
- How many states have realized projected revenues from casinos? None that we can find.

21

## Case Study: Delaware

- The state legalized slots in 1995
- Once saturation point reached, revenue plummeted
  - Added table games and sports betting in 2010
  - Added online gambling in 2012
  - "Last year, the casinos threatened layoffs unless Delaware lowered their tax rate. Instead, Gov. Jack Markell gave the casinos \$8 million in subsidies."
  - Commission looking into lowering casino tax rate (which is something Steve Wynn is already trying to do in Mass)
- Delaware used tax payer money to **bail out** the casinos that were supposed to be economic development engines and job creators

22

## Case Study: Maryland

- The state projected \$700-800 million/year in slot revenue
  - 3 years after voter approval, slot revenue expected to be \$475 million **over 5 years!!!**
- In an attempt to scratch out more revenue, Maryland has allowed casinos to stay open 24 hours (after previously closing at 4 AM, and serve alcohol 24 hours/day)
- This **slippery slope** gets repeated over and over. Remember you're not voting to allow 1 or 3 casinos with the current regulations – you're opening Pandora's box

23

## Suggested Common Sense Regulations

- Require that all ATMs on premises have withdrawal limits similar to those off-site
  - This will reduce the ability of problem gamblers to spend more than they can afford
- Do not allow casinos to serve free alcohol period
  - If someone can afford to play the slots, they can afford to buy their own drink
  - This would increase public safety by reducing risk of DUI fatalities
  - It is admirable that you've decided to prohibit alcohol sales to 8 PM- 2 AM (draft regulations on MGC packet 2/20/14), but the free alcohol needs to go, and alcohol hours should be the same a local bars
  - A business that is predicated on lowering inhibitions and encouraging irrational behavior is not one that should be supported by the state
- Require that clocks be installed and visible from the slot machines to allow patrons to gauge the amount of time they've been playing

24

## Suggested Common Sense Regulations

- Enact the UK's [recent guidelines](#) to alert slot players when they've lost X number of dollars or they've been playing for 30 minutes
- Make the number of jobs, the minimum investment in the facility, the percentage of workers from Springfield a condition of the license
  - Revoke the license or fine MGM if it fails to live up to its promises
- Like Monaco or Aruba, limit the number of times per month a local resident may visit the casino.
  - Monaco bans all citizens
  - Aruba limits residents to 8 visits/month
  - This would limit problem gambling and ensure that a higher percentage of visitors would be from out of the region

25

## Summary: What is the precedent for a casino transforming a city/region/state positively?

- There is none
- Even MGM says that they're doing something unprecedented – so what's the basis for all of their promises? When has a casino ever rejuvenated a city?
- Q. What city is the template? A. There is none
- This is a big risk with little chance of reward, except for the millionaire and billionaires in Vegas and Dubai, of course
- The answer: [Repeal the Casino Deal](#)

26

## Balcom, Darian (MGC)

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**From:** John Miller <vze1rp5a@verizon.net>  
**Sent:** Sunday, March 30, 2014 6:03 PM  
**To:** MGCcomments (MGC)  
**Subject:** Preservation

**Categories:** Yellow Category

I understand that we can not save all of the historic buildings etc ...in Springfield, but to destroy unique or beautiful architectural treasures such as the glass ceiling in the rotunda at 73 State st is crazy, I am sure it could be worked into the MGM design and highlighted as part of Spflds history.

Thank you,  
John Miller  
Sent from my iPod

Dear Sir/Madame:

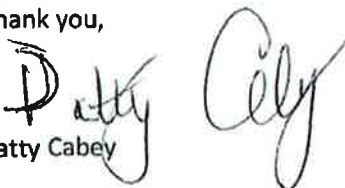
I received an update from the SPT on the plans for the MGM Casino and its effect on the Architectural history of our City. It distressed me to read that the original plans set forth by MGM contained preserving our structural history and since has changed to include only a fraction of the original plan.

The Union House on Main Street is the third oldest commercial building in downtown and is one of the few remaining Springfield commercial buildings in the Italianate style. The YWCA on Howard Street was designed by Eugene Gardner, one of the region's most prominent architect and serves as an example of early 20<sup>th</sup> century social service activity in the city. Lastly, the ornate lobby and glass ceiling in the rotunda of 73 State Street reminds us of the splendor and integrity of the businesses that once graced the South End of Springfield.

Springfield is rich in history and this needs to be protected. If you visit the gaming establishments in our neighboring state you see that they pay very close attention to honoring the Native American history. We need to follow that example and not only embrace the growth of Springfield by adding a Casino but also embrace the past with our architectural history.

I am writing to you to ask you to please think about our great City and all that it stands for and ask that MGM reconsider their plans for the Casino.

Thank you,

  
Patty Cabey

Lifelong Citizen of Springfield

2014 MAR 28 AM 11:54  
MASSACHUSETTS GAMING  
COMMISSION

**Bratton-Davies, Marianne (MGC)**

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**From:** Dan Kelly <danpkelly41@gmail.com>  
**Sent:** Saturday, March 01, 2014 5:54 PM  
**To:** MGCcomments (MGC)  
**Subject:** West Springfield Public Meeting

Dear Mass Gaming Commission,

Whereas I appreciate the fact that you will be holding a public input meeting in West Springfield on March 3, 2014, I am disappointed that you would schedule it on a Monday at 4:00pm when most members of the public would be unable to attend. This seems counter productive if you are truly looking for the public's input.

Thank you,

Dan Kelly  
West Springfield Resident

## Bratton-Davies, Marianne (MGC)

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**From:** MGC Website <website@massgaming.com>  
**Sent:** Saturday, March 01, 2014 6:55 AM  
**To:** MGCcomments (MGC)  
**Subject:** Contact the Commissioner Form Submission

### Name

Andrea MacGovern

### Email

[irishadvocate55@hotmail.com](mailto:irishadvocate55@hotmail.com)

### Phone

(413)363-5241

### Subject

safety concerns

### Questions or Comments

I have resided in Springfield for 58 years, had scary experience last night downtown, 9:45 PM, followed by an individual seeking money. NO police present in a 4 block area, very scary, I ran to my car and sped away. I will not venture out again. How will this area be safer with a casino added??? Our crime is up, not down. The police car, but are overwhelmed at this point.



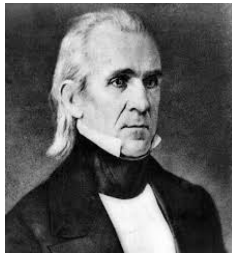
# UNION HOUSE

1132-1142 Main Street

*built:*  
1846

*architect:*  
Henry  
Sykes

*style:*  
Italianate



*President James Polk*

Union House is the third oldest commercial buildings left in Downtown. It was designed by regional architect Henry Sykes, who also designed the Mills-Stebbins Villa in Springfield and the Amherst College observatory. For many years, it was Springfield's finest hotel. In 1847, it hosted President James Polk during a trip through the Northeast. In his entourage were Attorney General Nathan Clifford and Secretary of State James Buchanan. The building continued as a hotel until the Great Depression and has been used for retail since then.

MGM will demolish this four-story building and replace it with a new four-story building with retail and restaurants on the ground floor and apartments above. The Historical Commission has asked that the building be adaptively reused for the same uses.



**SPRINGFIELD PRESERVATION TRUST**

74 Walnut Street, Springfield, MA 01105 | [springfieldpreservationtrust.org](http://springfieldpreservationtrust.org)

# TURNVEREIN BUILDING

79-83 State Street

*built:*  
c. 1888

*architect:*  
Unknown

*style:*  
Classical  
Revival



The Turnverein Society was a German-American social organization dedicated to promoting physical activity. The Springfield branch was established in 1855. After the group relocated, the building was used as offices and a new Classical Revival style façade was added in the late 1920s. The Historical Commission has asked that the facade be incorporated into the development.

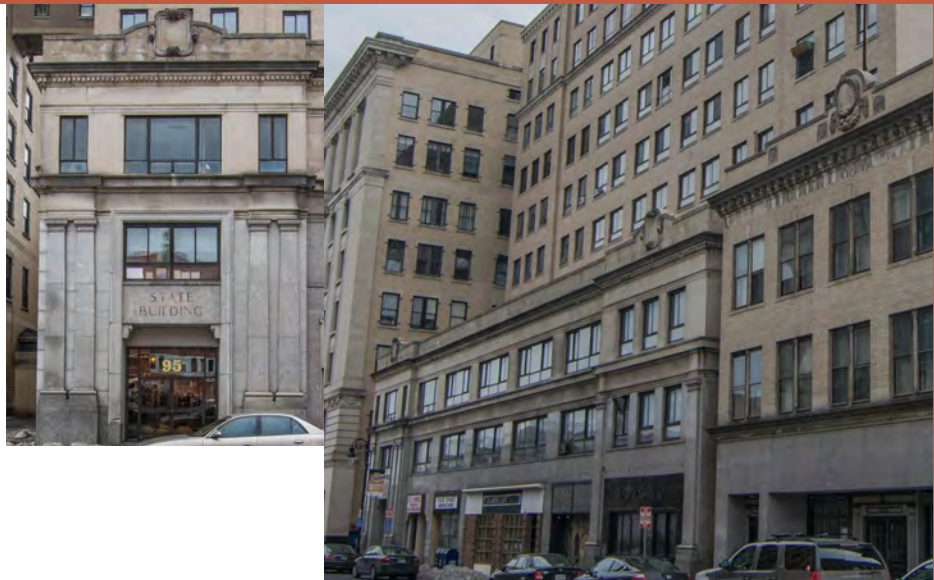
# STATE BUILDING

85-95 State Street

*built:*  
1929

*architect:*  
Burton  
Geckler

*style:*  
Classical  
Revival



The State Building was designed in the Classical Revival style by Burton Geckler as an annex to 1200 Main Street, the large office building next door. MGM will demolish the eleven-story building for its casino. The Historical Commission has asked that the façade of the first three stories be incorporated into the development.

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# UNITED ELECTRIC COMPANY

73 State Street

*built:*

1910

*architect:*

Thomas M.  
James

*style:*

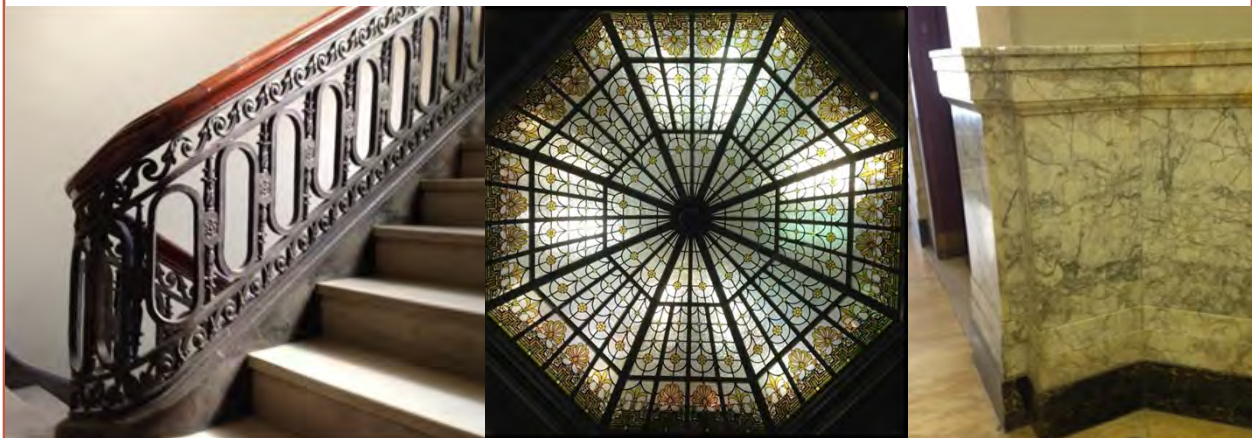
Beaux Arts



This building was constructed for the offices of the United Electric Company, which played a major role in providing electricity to Springfield. Electricity was first introduced in Springfield in 1881. The United Electric Company was founded in 1887. It operated until 1943 when it was consolidated into the Western Massachusetts Electric Company.

The building was designed in the Beaux Arts style by Thomas M James, a Boston architect who designed many eastern Massachusetts structures, including the Shubert Theatre.

MGM will demolish the building but retain the façade for its hotel. The Historical Commission has asked that its ornate lobby also be incorporated into the project.



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# YOUNG WOMEN'S CHRISTIAN ASSOCIATION

20-30 Howard Street

*built:*  
1907

*architect:*  
Eugene  
Gardner

*style:*  
Renaissance  
Revival



The YWCA has played an important role in the social welfare of the community since organized in 1875 as the Women's Christian Association, an auxiliary of the YMCA. Its initial goal was to provide room and board to women entering the work force. Later it expanded its activities to include nursery care, lectures, and classes.



*Ham House*

Important Springfield architect Eugene Gardner loosely modeled the building after Ham House, an important 17<sup>th</sup> century English country manor.

MGM will demolish the building. The Historical Commission has asked that its façade be incorporated into the south wall of the development.



**SPRINGFIELD PRESERVATION TRUST**

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# STATE ARMORY

29 Howard Street

*built:*

1895

*architect:*

Robert Wait &  
Amos Cutting

*style:*

Romanesque  
Revival



This imposing castle-like structure was built to house the state militia. It was designed in the Romanesque Revival style by Boston architects Robert Wait and Amos Cutting and supervised by local architect Eugene Gardner. Its large drill shed was severely damaged by the 2011 tornado and was demolished due to public safety concerns.

MGM will demolish the back half of the building and reuse the front half as a restaurant. The Historical Commission has asked that its back half also be retained.



**SPRINGFIELD PRESERVATION TRUST**

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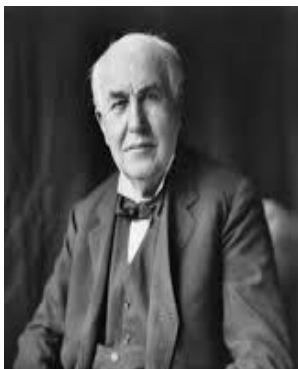
# EDISONIA THEATRE BLOCK

1156-1178 Main Street

*built:*  
1913

*architect:*  
Eugene &  
George  
Gardner

*style:*  
Classical  
Revival



This building was designed by father and son architectural firm of Eugene and George Gardner. Besides stores and offices, the structure housed one of Springfield's earliest motion picture theaters, named in tribute to Thomas Edison.

MGM will demolish this building and replace it with a new four-story building with retail and restaurants on the ground floor and apartments above. The Historical Commission has asked that the new building incorporate the façade of the Edisonia Theatre with its stucco and glazed terra cotta details.

*The Edisonia Theatre was named after Thomas Edison*



**SPRINGFIELD PRESERVATION TRUST**

74 Walnut Street, Springfield, MA 01105 | [springfieldpreservationtrust.org](http://springfieldpreservationtrust.org)

## **Questions for Host Community Hearing: Springfield/MGM April 1, 2014**

### **Category 1 Overall**

1. Please identify when you will provide the analysis requested by the Massachusetts Historical Commission and the Secretary of Energy and Environmental Affairs' DEIR Certificate. This analysis needs to address your assessment of the conditions of each of the listed historic buildings located within the project site and should include a description of how the project's design will avoid, minimize and mitigate impacts to these resources. Identify if your plan to address these comments will affect the current design concept for the casino site.

### **Category 2 Finance**

1. If your Springfield application is successful, you will have two additional large projects in your development pipeline:
  - A \$2.9 billion project in Macau (Cotai)
  - A \$925 million project in MarylandQuestion:
  - In general, how will Springfield fit into this development pipeline?
2. In general, can you discuss how you position and market a property located in a destination market (e.g. Las Vegas) compared to a regional market property (e.g. Detroit).
  - Specifically with regard to the Springfield opportunity can you elaborate on your current understanding of the market including your view of the competitive landscape and your ability to capture a fair share of that market?

### **Category 3 Economic Development**

#### **Jobs**

1. In your application you show Year 1 and Year 5 employment projections. Total FTEs for year 1 are the same as year 5. How do you account for these projections in light of eventual competition coming on-board (i.e., New York casinos)? Can you explain how you intend to maintain employment under increased competition?

2. If approved by the Commission, the MGM Springfield project will be one of the largest construction projects undertaken in the area. What work has MGM done to identify contractors/trades and sub trades from the region so local trade and construction workers will have the first opportunity for jobs? How will MGM and your general contractor work to ensure the MBE/WBE/VBE and MA residency requirements will be met?
3. Please quantify, to the extent possible at this stage, the financial commitment you are planning to make for pre-training, basic skills training, ESL and related programs during the project start-up and in the initial years of operation.
4. Please identify the job categories most frequently accessed by those residents who may be categorized as under-employed and unemployed? Have you tracked the career progression of the under-employed/unemployed in one or more of your facilities? Please provide examples.
5. MGM's commitment to ethnic diversity is commendable. Please provide additional detail as to how MGM seeks to ensure ethnic diversity in middle and senior management ranks.
6. You have made commitments in your application and the host community agreement to hire locally (in the City of Springfield and "surrounding area") with no more than 10% of workforce from "outside the region" as well as to favor local suppliers/vendors (in the City of Springfield and "Greater Springfield Area"). Can you define "surrounding area", "region" and "Greater Springfield Area" in the context of filling positions and procuring goods/services at the proposed gaming facility?
7. What consideration has been given/discussions held with City of Springfield and/or the Pioneer Valley Transit Authority (PVRTA) about public transit options to address MGM employee needs?



## **Category 3 Economic Development (cont'd)**

### **External Business**

1. Please comment on the likely impact MGM may have on the workforce from other hospitality businesses in the Springfield area (e.g., hiring away employees at other area businesses) and what role you may play in creating a positive impact on the region's workforce.
2. Please provide more detail on how you will assist Springfield-area and Massachusetts small businesses to supply the MGM operation through both construction and operational phases. What strategies do you plan to employ to allow small businesses to compete successfully for contracting opportunities?

### **Tourism**

1. Please clarify the statement in your application about supporting the Greater Springfield Convention and Visitors Bureau. Beyond financial support, what does MGM plan to do to engage with this and related marketing entities?

## **Category 4 Building & Site Design**

1. In the street elevation provided under 04-05-01, and your recently submitted RFC renderings, there appears to be a pedestrian bridge connecting the casino with the MassMutual center; but in renderings attached to question 4-04-01 the bridge is missing. Please clarify if a pedestrian bridge connecting your site to the MassMutual Center is included in the proposed project.
2. Please identify the proposed relocation site of the French Congregational Church building that currently sits on Bliss Street. Please clarify if the church will be where the employee daycare will be located.
3. Please describe your current efforts and future plans to coordinate with MassDOT on their 1-91 Viaduct Rehabilitation project. What are your plans to address concerns related to construction staging, maintenance of traffic and impacts on parking resources adjacent to the project site, Court House complex and other downtown facilities?
  - Your response to Question 4-27 Adjacent Land in the RFA-2 application indicated that you plan to temporarily use the City's North and South Garages located under the viaduct during construction of your project. What are your alternatives for offsite parking during construction if these facilities are not available?

## Category 5 Mitigation

1. Please explain how the free parking accommodation at your onsite garage will be managed: including access, timeframes for availability, and possible validation. Describe how you will coordinate with existing City or state parking facilities in the area that charge for usage, including the North and South parking garages under the I-91 Viaduct and Mass Municipal Center parking.
2. Please describe your proposed bus stop improvements along Main St and Union Street. Confirm if you have agreed to provide bus shelters and/or curb modifications at these locations as part of your project construction.
3. Please provide an update on your negotiations with the Massachusetts State Lottery. Have they agreed to utilize the Leap Forward software proposed in your application? Do you have a signed agreement with the Lottery addressing commitments to serve as a lottery sales agent?
4. We'd like you to provide more detail on how you will train new employees on problem gambling and responsible gaming; including specific methods to identify those who may have gambling-related problems and how to assist them to obtain help for those problems. (Related to question 5-26.)
5. In the response to question 5-27, you described how credit won't be extended to persons on the self-exclusion list but you do not describe how you will ensure it won't be extended to persons exhibiting gambling-related problems (and not on the Self Exclusion list). Please elaborate on your approach to this issue.

My name is Marjorie Hurst.  
I am a life-long resident of the city  
of Springfield an attorney, a former  
member of the Spfld. School Committee  
and currently, along w/ my  
husband, Frederick Hurst, am  
the owner of a community news-  
paper, ~~The~~ African American Point of View

We have believed from the  
beginning that MGM <sup>Springfield's</sup> proposal  
will have a positive impact on  
downtown Springfield, specifically  
and to ~~the entire city~~ <sup>entire city</sup> and region  
in general. ~~We~~

We believe it will spur employ-  
ment and we know from our inde-  
pendent research that the employment  
will be diverse.

We're convinced that combined  
with the ~~many~~ other economic  
development projects that are going  
on or about to begin in Springfield  
that the revitalization of the entire

in support of MGM

City is a good probability that should be favorably acted upon.

I not only speak from observation but from the very personal and business relationships that we have developed with MGM personnel over the past 2 years.

So, in closing, I urge you to take positive action on this proposal as soon as possible.