



SMART GROWTH AND REGIONAL COLLABORATION

September 15, 2017

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

Dear Commissioner Stebbins:

On behalf of the Metropolitan Area Planning Council (MAPC), I am submitting the following economic development strategies regarding the use of the Gaming Economic Development Fund. MAPC's economic development work is guided by our regional plan *MetroFuture*¹ and the Comprehensive Economic Development Strategy (CEDS)². We believe that economic development should be promoted in a sustainable and equitable manner, and we support programs and funding opportunities that incorporate those values. In particular, we support programs that advance equity, provide high quality jobs with strong career pathways, and help lower-income communities and populations to prosper.

We acknowledge that there are other funds, including the Community Mitigation Fund, associated with gaming in addition to the Gaming Economic Development Fund. There are also Host and Surrounding Community agreements that will address some of the planning needs of the Host and Surrounding Communities most impacted by the development of casinos in the Commonwealth. We have therefore focused our efforts in developing strategies which we believe will be the highest impact within the priorities set forth for this fund.

In some cases, we have recommended that the money from this fund be assigned to existing state programs. However, in order to ensure that the funding benefits the Host and Surrounding Communities to the maximum degree, a certain percentage of any new revenue placed in these state programs must be assigned to applicants within the communities most directly impacted by the respective casino developments.

Strategies and programs are outlined below according to the priorities outlined by the Gaming Commission. It is important to note that these strategies are categorized by those most closely related to the Gaming Commission priorities, but in most cases each advances more than one priority. Throughout the letter, we reference specific examples of ideas and input that we have gathered from communities that will be directly impacted by casinos developed within the MAPC

¹ *MetroFuture* is MAPC's long-term plan for a more prosperous, equitable, sustainable region and guides all of our agency's work. *MetroFuture* identifies 65 goals for the region to achieve by 2030, categorized into six topic areas including Prosperity, Transportation, Sustainable Growth Patterns, Housing Choices, Community Vitality, and Environment.

² The CEDS is developed with funding from the U.S. Economic Development Administration (EDA) and is updated at least every five years. MAPC, as an EDA-designated Economic Development District, coordinates, strengthens, and aligns economic development work throughout the region with the goals and strategies as depicted in the CEDS. These goals and strategies in the CEDS fall into multiple categories: regional collaboration, strengthening key industry and businesses, workforce training and education, transit accessibility and walkability, and creating a diverse, resilient, and equitable economy. The CEDS not only provides a plan and vision for advancing economic development in the region, but also creates a framework that guides EDA funding decisions.

region. We also acknowledge that we are submitting a number of ideas that will likely exceed the capacity of this fund.

Workforce Development

Regarding workforce development, MAPC believes in the importance of maintaining a strong supply of educated and skilled workers of all ages to encourage businesses to locate and expand here. We have identified the importance of workforce development programs tailored to quality jobs with career pathways as a particular strategy within the CEDS.

Two critical components of workforce development in Massachusetts are the Workforce Competitiveness Trust Fund (WCTF) and the Massachusetts High Demand Scholarship. The WCTF has provided thousands of unemployed individuals with the skills needed to meet current workforce demands. The fund trains workers for in-demand jobs and creates pathways to better-paying jobs. It is particularly targeted at improving outcomes for low-income individuals and low-wage workers. Investment in this fund could help to support workers in casino jobs, service sector jobs that support the casino, as well as other low-income individuals living and working in the Host and Surrounding Communities in order to enhance their financial stability and improve their career pathways. The WCTF often funds regional partnerships that include local businesses, community-based organizations, and educational and workforce development organizations. The additional monies placed in this fund should particularly reward efforts to place low income workers from under-served communities in jobs with strong career pathways. Many of the Host and Surrounding Communities are Gateway Cities or face similar challenges of disinvestment. In other cases, the Host or Surrounding Communities may have strong public transit connections with communities or neighborhoods that are under-served and in need of better job opportunities. Supporting the WCTF with monies from the Gaming Economic Development Fund would help to advance the following priorities as outlined by the Gaming Commission: workforce training and regional economic development initiatives.

The Massachusetts High Demand Scholarship awards scholarships to community college students at public post-secondary institutions who choose to major in high-demand fields such as engineering, technology, and healthcare. It is critical to guide and encourage our college students to choose career fields that will provide future employment stability by matching the needs of employers already located in our Commonwealth and those we hope to attract with the many advantages present in Massachusetts. The Massachusetts High Demand Scholarship helps to do just that. Unfortunately, this program has seen steadily decreasing funding and would benefit from additional monies from the Gaming Economic Development Fund. This fund ties together a number of the Gaming Commission priorities including workforce training, higher education scholarships, and Science, Technology, Engineering, and Math (STEM).

Efforts to place workers who are in low income and under-served Host or Surrounding Communities as well as low income and under-served communities that have clear public transit access to Host and Surrounding communities should be emphasized.

Green Jobs

The Massachusetts Clean Energy Center (MassCEC) has provided green job training programs that prepare unemployed and underemployed people for jobs in the fast-growing clean energy industry cluster. Through the Learn and Earn program, MassCEC allows providers to conduct classroom instruction and to provide summer job opportunities to students interested in pursuing a clean energy job in the future. They also have a successful Women in Clean Energy program that is designed to help low and moderate income female workers to build careers in the clean energy industry.

Through MassCEC's grant program, the Economic Development and Industrial Corporation leads the Metro Boston Green On-the-Job Training (GOJT) Collaborative, a partnership of clean energy employers, municipalities, workforce boards, career centers and training providers who train and place underemployed and unemployed residents from 64 communities in Metro Boston in on-the-job training experiences leading to full-time permanent employment. Additional grant funding to MassCEC from the Gaming Economic Development Fund would help to expand or create additional cross-sector partnerships to advance Gaming Commission priorities such as the workforce development priorities along with green jobs promotion, STEM, and summer jobs.

Tourism Promotion/Cultural & Recreational Attraction Promotion

MAPC recognizes the importance of supporting arts and culture as both a community development and economic development tool. Efforts to support arts and culture are under-funded across the Commonwealth, and although a certain percentage of the taxes on gross gaming revenue are already being directed to the Mass Cultural Council, MAPC supports additional funding from the Gaming Economic Development Fund being directed to MCC. MCC's grant programs support cultural activities that have the capacity to revitalize communities, stimulate income, create or enhance jobs, and attract tourism. The creation of an entertainment complex within Wynn Boston Harbor may adversely affect existing tourism attractions, such as the Lynn Auditorium, a large Art Deco building that defines the civic heart of Lynn, and the 1,800 seat Chevalier Theatre in Medford. Additional funding for MCC programs, including the Cultural Facilities Fund, would help to support these existing institutions after the casino is developed.

Some of the Host and Surrounding Communities within the MAPC region have already been talking with one another in order to identify regional approaches to attracting more tourists to their region. For example, Foxborough, Wrentham, and Plainville have already developed a concept to work together around regional tourism. We are strongly supportive of multi-community proposals that address jobs, tourism, and transportation issues.

Regional Economic Development Initiatives

As a Regional Planning Agency, MAPC believes in the critical importance of linking smart growth with economic development. We have worked with a number of our communities, including those surrounding the Wynn Casino Development in Everett, to map out Priority Development Areas (PDA) and Priority Preservation Areas (PPA). PDAs identify sites with the most significant economic

and mixed-use development potential. Communities who have conducted forward-thinking land use planning should be supported in their efforts to implement these plans. Some of the monies from the Gaming Economic Development Fund should go to the Host and Surrounding Communities that have mapped PDA's and PPA's, identified sites for economic development and multi-family housing production, and worked to update zoning to encourage redevelopment and investment. Since the funding is limited, it should be actively targeted at those communities that are pursuing implementation of PDA and PPA planning.

In particular, some of this funding should augment efforts to plan for and build affordable housing. Many of the employees working at the casino will need access to affordable workforce housing. In addition, the investment associated with the casino has the potential to inflate rents and sales prices in the vicinity, leading to displacement. This is a particular concern in the communities surrounding the Wynn Casino, where some of the increasingly rare "naturally occurring affordable housing" (NOAH) can be found. Since the funding is limited, the monies from the Gaming Economic Development Fund can go towards providing technical assistance to implement housing plans, towards funding the preservation of existing affordable housing stock, and towards necessary design work for the infrastructure that could support this type of development. This could be done through existing municipal rehab programs or through grants to Community Development Corporations (CDC's) and Community Action Agencies (CAA's). We feel that affordable workforce housing is a critical piece of economic development in Massachusetts. If we want to fill jobs, workers need to be able to find affordable homes within a reasonable distance of their place of employment. Rewarding communities who have thoughtful planning practices in place and who are driven to produce and preserve affordable housing is a strategy to support the economic development efforts of the Host and Surrounding Communities.

These resources could be added to a new fund explicitly for these purposes and managed by the Gaming Commission.

Summer Jobs

Summer jobs programs help teens and young adults, many from low socio-economic status communities get the skills and experience needed to find and keep jobs. Communities provide employment, mentoring, and character-building activities for youth through community collaboration with local organizations, city government, community parks and businesses. Funding currently comes through grants and partnerships with local businesses. Jobs range from clerical jobs and parks to jobs at local law offices, banks and insurance companies. Jobs could also be at businesses that directly support or have synergy with the casino development. An added benefit of summer jobs program is that local communities are able to create and bolster relationships with local businesses by establishing connections through programs such as these while at the same time providing much-needed mentoring and skills development for local youths. Although there are an extensive amount of applicants for these programs, there is not enough funding to hire most of them. This is particularly the case in Lynn where they always have more applicants for their summer programs than they can support. Their program typically gets 300-400 applicants and they can only fund 120 participants. Monies from the Gaming Economic Development Fund should

be directed to under-funded summer job programs that the Host and Surrounding Communities already have in place.

Support for Small Businesses

The CEDS also speaks to the critical importance of creating policies and programs that support current and prospective small business owners. Some provisions to support small businesses have been put in place through Surrounding Community & Host Community agreements negotiated between individual communities and the casino developers. In the case of Wynn Resorts Limited (Wynn), these provisions include the use of local contractors and suppliers in its project, consulting with local business groups and chambers of commerce on economic opportunities, advertising for and hiring local workers, and maintaining a proprietary concierge program to promote the cultural, historical, and entertainment attractions in the region. In some cases Wynn has also agreed to coordinate with local communities to include local charities and nonprofits in its charitable donations and to offer local businesses the opportunity to market their goods and services to Wynn's employees via the WE Save Program. These provisions should be strengthened to ensure that they are taking place and are consistently implemented across all of the Host & Surrounding Communities.

MAPC also strongly supports the Small Business Technical Assistance (SBTA) Program. The Small Business Technical Assistance Grant Program helps small businesses to succeed in underserved communities in the Commonwealth, particularly low- to moderate-income communities and communities of color. It is particularly well suited to serve many of the small businesses within the communities surrounding the Wynn Casino development. The program provides funding to not-for-profit grantees, including CDC's or Community Development Financial Institutions (CDFIs), who offer a range of technical assistance and financial services to small business clients. The fund helps to build operational capacity and skills of organizations that are providing technical assistance, education, and access to capital to small businesses, including many owned by women, minorities and veterans. MAPC has done a Health Impact Assessment on this fund and found that in addition to the economic benefit, the program also provides a protective health benefit for business owners, small business employees, and residents in the communities that the SBTA program serves. Between FY2014 and FY2018 there has been a decrease of \$1.25 million (or 62.5%) in funding for this program. The funding could be utilized for business planning, education, and access to capital for small businesses impacted by the Casino development.

Small businesses in many of these communities also have a need to upgrade their building stock as many of the commercial buildings are the biggest contributors to greenhouse gases and in many cases are also vulnerable to the impacts of climate change. Some of the funding from the Gaming Economic Development Fund could be used to support municipal programs that would administer no interest loans or loans with principal buy-downs for upgrades of small commercial properties of businesses, in order to reduce energy-use or add resiliency elements.

Agricultural Development

The CEDS also makes the case for the importance of supporting local agriculture and the agriculture industry in the region. MAPC recently led development of the Massachusetts Local Food Action Plan, which includes strategies for supporting agricultural development programs. One program that should be prioritized for additional funding from the Gaming Economic Development Fund is the Healthy Incentives Program (HIP).

The Healthy Incentives Program (HIP) matches SNAP purchases of local fruits and vegetables when participants are shopping at farmers markets, farm stands, mobile markets, and CSA farm share programs. Customers who use SNAP dollars on farm fresh fruits and vegetables at participating HIP retailers will see the amount of their purchase instantly added back to their EBT card. The program not only increases the purchasing power of lower-income residents, but it has the additional benefit of bolstering farmers markets and thereby supporting local farms. The HIP program is funded through 2020 through a federal grant, but MAPC believes that this program should be established and made permanent through Massachusetts state law. A certain percentage of the additional funding should be dedicated back to the Host and Surrounding Communities in order to support agricultural development in the communities that will be most impacted.

Thank you for the opportunity to submit these strategies. We look forward to the opportunity to continue this conversation.

Sincerely,

A handwritten signature in black ink, appearing to read "Marc Draisen". The signature is fluid and cursive, with a large initial "M" and "D".

Marc Draisen
Executive Director