

MASSACHUSETTS GAMING COMMISSION SURROUNDING COMMUNITY PETITION ANALYSIS



COMMUNITY:
APPLICANT:

TOWN OF BOLTON
PPE CASINO RESORTS MA LLC

11/20/2013

INTRODUCTION AND OVERVIEW

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.

1. PROXIMITY

Legal Framework

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)

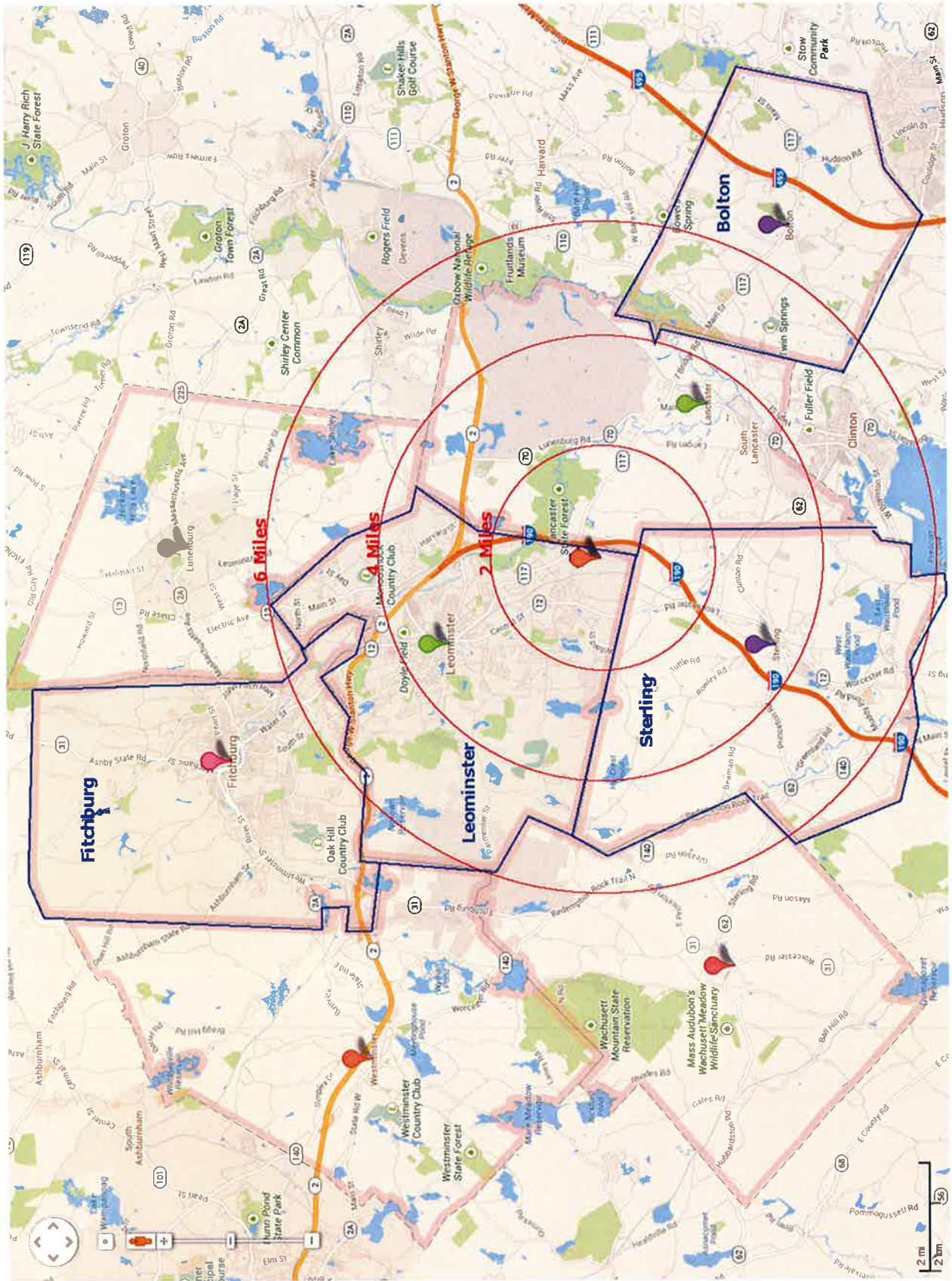
Executive Summary

The Town of Bolton claims that it is five miles to the east of the proposed facility and is closer than a number of communities that have already reached an agreement with the Applicant.

The Applicant argues that the Town of Bolton is more than five miles away from the facility, that its town center is approximately 8 miles from the facility, and that comparisons to other communities that have reached agreement with Bolton are irrelevant.

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.)¹

¹¹ See "Surrounding Communities Amendments" document included in December 12, 2012 Commission Meeting Packet.



A. COMMUNITY PETITION

The Town of Bolton lies five miles to the east of the proposed facility. A map showing the proximity of Bolton and the Applicant's proposal is attached as Exhibit A. An annotated copy of Bolton's Base Map and Zoning Map is attached as Exhibit B.

Bolton is bisected by Route 495, running north and south, and by State Route 117, running east-west. The Town has 5,350 residents and is primarily a residential community. The Bolton Center National Historic District runs west of Route 495 along Route 117 (Main Street) for approximately a mile. Two-thirds of the homes that were in the historic district in 1830 are still lived in today. See Exhibit B.

Historically an agricultural community, Bolton remains home to a number of large, working apple orchards. Bolton, together with the neighboring towns of Lancaster and Stow, is part of the Nashoba Regional School District. The district's high school is located on Route 117, west of Route 495, as is access to Bolton other schools: Florence Sawyer School and Emerson School.

Bolton is in Close Proximity to the Leominster site

As illustrated by Exhibit A, at the Lancaster line the Town of Bolton is only 5 miles from the site of the Proposal. Although Bolton does not share a border with Leominster, the center of Bolton is closer to the Jungle Road site than the center of other towns that the Applicant has already designated surrounding towns:

	Distance to Proposed Facility
Bolton	8.1 miles
Lunenburg	8.8 miles
Westminster	13.6 miles
Townsend	14.5 miles

Lancaster, of course, is closer to the proposed facility but nearly all traffic that approaches Leominster from Lancaster will have first come through Bolton. Route 117 provides ready access between Bolton and the host community and, as traffic levels illustrate, is the route that thousands of commuters and others daily take from the west to Route 495.

B. APPLICANT RESPONSE

THE TOWN IS NOT IN PROXIMITY TO THE PROJECT

Leominster and the Town do not share a border and the Project site is more than 5 miles from the closest border of the Town. The driving distance between the Project's site and the town hall and center of the Town is approximately 8 miles. The Petition attempts to establish proximity by comparing the distance from the Project to the Town and the distance between the Project and other neighboring communities that PPE has executed Surrounding Community Agreements with (Lunenburg, Westminster and Townsend). The Town's argument misses the purpose and intent of the Commission's regulations on Surrounding Communities.

Under the Commission's regulations there are three methods for a neighboring community to be designated a Surrounding Community - by the applicant's designation in its application; by the applicant entering into a Surrounding Community Agreement; and by petition to the Commission. (See 25 CMR 125.01(1).) The criteria for establishing a Surrounding Community (25 CMR 125.01(2)(b)) only applies to the Commission's determinations under the petition process. This process of designating Surrounding Communities encourages applicants and communities to reach agreement consensually in an effort to promote regional cooperation in the development of a gaming facility that is unique from other large scale developments where neighboring communities generally have no input into zoning and planning decisions made by other jurisdictions. This is consistent with the intent of the Expanded Gaming Act and the Commission's Phase 2 application that encourages applicants to reach out to regional development organizations and other local businesses across jurisdictional lines.

PPE worked hard to reach out to neighboring communities, regional development and marketing organizations, communal organizations and businesses throughout the North Central Massachusetts area with the goal to meet the regional development intent of the statute and regulations. Those efforts resulted in agreements with 5 neighboring jurisdictions to allow them to benefit from the development of the Project without regard to whether they qualify as Surrounding Communities under the criteria established for the petition process. To give credence to the Town's argument that it should be designated a Surrounding Community because PPE entered into Surrounding Community Agreements with communities that are less proximate than the Town would undercut PPE's good faith efforts to promote regional cooperation and the intent and purpose of the Commission's regulations.

Accordingly, the Town is not in proximity to the Project. However, if the Commission were to find that the Project was in proximity to the Town, the Town has not and cannot demonstrate that the Project is likely to cause any significant and adverse impacts on the Town.

C. RPA ANALYSIS

None

D. ENF ANALYSIS

None

E. CONSULTANT ANALYSIS

None

F. APPLICATION

2-30

The Project is sited directly off I-190 and Route 117 in an existing commercial industrial area. A portion of the site is an existing gravel pit operation and adjacent neighbors include two plastics manufacturers, Wal-Mart and Lowes Home Improvement. The closest residential neighborhood, Liberty Commons in Leominster, and PPE have entered into a Letter of Agreement which outlines among other items, a means for PPE and the Homeowners Association to communicate and address issues such as traffic, trash and security.

G. OTHER**NOVEMBER 14, 2013 – COMMUNITY COMMENTS AT PUBLIC MEETING**

23 The town of Bolton doesn't adjoin
24 Leominster, but the gaming establishment is
1 proposed on the far side of Leominster. And we
2 are actually closer to the gaming establishment

3 than four of the five surrounding communities
4 which have already reached agreements with the
5 applicant.

NOVEMBER 14, 2013 – APPLICANT COMMENTS AT PUBLIC MEETING

5 MR. WEINBERG: While they are
6 setting up the AV here, let me just start by
7 saying good morning. As you all know, I'm Joe
8 Weinberg, managing member for PPE.
9 I thought I would start a little bit
10 just by an introduction to how we've approached
11 the issue of surrounding communities. There's
12 no precedent for this anywhere in the state,
13 other than trying to interpret the statutes.
14 We took the approach of looking are our, I'm
15 going to call them, neighboring communities.
16 And how could we work with our neighboring
17 communities to try to make the benefits of our
18 project available to our region and really try
19 to approach this as a project that would
20 benefit the region.
21 From the standpoint of the technical
22 requirements of a surrounding community which
23 requires or outlines that you're a surrounding
24 community if you meet a number of tests. It's
1 not just you have a border that is adjacent but
2 it really gets more into is there a significant
3 adverse impact that you are going to have on
4 that community.
5 And we truly believe that we are not
6 going to have a significant adverse impact on
7 any of the communities around us. As you know,
8 the statute also looks at if there are any
9 adverse impacts, how do you weigh that against
10 the positive benefits of the project. And I
11 think the Commission, the state, the people of
12 Massachusetts who voted for this gaming act, if
13 they believed that the net benefits were
14 negative, we probably wouldn't be sitting here
15 today.

16 So. what we did you see on the map
17 here, you see Leominster in the middle. And
18 then we have eight communities who we have been
19 contacted by or in touch with regarding what I
20 will call these cooperation/surrounding
21 community agreements.
22 You can see to the east is Lancaster
23 and Bolton. Lancaster is the only community
24 that actually shares a border with the casino
1 project itself. In fact, we have entered into
2 a signed a surrounding community agreement with
3 Lancaster.
4 CHAIRMAN CROSBY: That's a completed
5 agreement?
6 MR. WEINBERG: Completed. And I
7 actually have it to give to John today. We
8 also have four other completed agreements with
9 Lunenburg, Townsend, Westminster and Princeton.
10 Just to address one of the final
11 comments from Bill recently, the statute
12 encouraged these amicable negotiations with
13 neighboring communities. And you have to start
14 and try to put them together as you are able to
15 do it. I think us and any other developer who
16 felt like by being amicable to work out one of
17 these cooperation surrounding community
18 agreements that if it was going to be held as a
19 prejudicial evidence that anyone else who is in
20 the same area is entitled to the same status as
21 a surrounding community, we and I don't think
22 anyone would undertake these type of amicable
23 agreements.
24 The idea is to try to create this
1 sphere of cooperation, but if it is going to
2 come back to haunt you that you've actually had

3 these constructive discussions, you've
4 negotiated agreements but that is going to
5 prejudicial to you with those who do not want
6 to negotiate in good-faith or you just can't
7 come to agreement, I don't think that's what
8 the statute says. I don't think that's what
9 the intent was. And I think it's impractical
10 if that were the intent, because then you get
11 into constantly riding in the circle.
12 So, our approach has been to try to

13 work with our neighbors, to try to work through
14 the benefits of the project. There's been one
15 consistent concern we've heard from everybody
16 we've dealt with and that's been traffic.
17 And we believe that the traffic
18 impact on the local roads, and I'll be getting
19 to that in a moment, are going to be
20 negligible. We think most of the traffic is
21 going to come off the state roads, the state
22 highways.

2. INFRASTRUCTURE

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

The Town of Bolton argues that Route 117 provides ready access to the proposed establishment for traffic off Route 495 and that according to the applicant at least a quarter million new vehicle trips can be expected to pass through Bolton annually. Bolton contests the projections made by the Applicant and states that it expects that as many as 30% to 45% of the patrons will actually reach the Applicant's facility by traveling Route 117 through Bolton (compared to the 11% projected by the Applicant). Thus, the number of annual vehicle trips traveling through Bolton could approach 1 million. Bolton argues that those that regularly travel Route 2 will avoid it and instead will utilize the Massachusetts Turnpike, Route 495, then Route 117. Bolton also argues that Route 117 is a heavily congested roadway with an approximately three hour rush hour between 4 – 7 p.m. where traffic slows from 10-15 miles per hour.

The Applicant states that its market study and traffic study show that there will be very limited impacts to roadways in the Town and that these impacts will be solely limited to Route 117. The Applicant noted that “[t]raffic studies completed to date show that the Project will increase volumes at the Route 117/I-495 Northbound Ramps intersection by only 2.2%. (An estimated 54 PM peak hour vehicle trips will be added to the existing 2480 vehicle trips passing through the intersection as reported by the Town.)” Similarly, the Applicant argues that the addition of 54 PM peak hour Project trips on the western edge of Bolton represents a very modest 3.3% increase in traffic volumes and that the same peak hour trips between I-495 and Route 110 will use less than 2% of the capacity of Route 117. Further, the Applicant argues that its traffic is countercyclical and is after the PM commuter peak hour. Finally, the Applicant notes that the attractiveness of Route 2 as an option will improve with planned improvements in Concord.

A peer review , conducted by Woodard & Curran and Transportation Engineering Planning and Policy, of the Applicant's Traffic Impact Study, found the study to reflect professional practice and that the proposed project appears to have minimal traffic impacts. However, as noted by

Green International, the Traffic Impact Study completed by the Applicant did not evaluate traffic concerns outside of the borders of Leominster.

The Regional Planning Agency, Montachusets Regional Planning Commission discussed the project at a meeting in August, but did not file comments with MEPA as part of the Project's ENF filing. According to Green International, the Commission's traffic consultant, "[i]n that meeting, various issues were identified for the purpose of potential analysis in the MEPA project. These included the Route 117 corridor in Lancaster as well as several of the Route 2 interchanges including those in Westminster.

Green International finds that:

"The Stantec traffic study examined locations only within Leominster. The information provided in the study or other sources within the Application does not provide a substantial amount of information relative to the potential traffic impact on Bolton."

"Comments from MassDOT, and contained in the ENF Certificate, indicate that at a minimum, the DEIR should include both signalized intersections at the I-495 / Route 117 interchange in the Town of Bolton. This is directly due to the levels of casino-generated traffic as presented to date by the Applicant that would travel to the project site in Leominster via I-495 and Route 117 from the south and east, respectively. It should be noted that MassDOT also requested additional supporting documentation in relation to the Applicant's forecasts."

"The proposed casino is located on Jungle Road that is in close proximity to Route 117 and I-190 all in Leominster. Route 117 connects Leominster with the town of Bolton (traveling through Lancaster). The Leominster / Lancaster town line is approximately 0.3 miles to the east of the project site, and the Lancaster / Bolton town line is approximately 4.6 miles further east. The Stantec study estimated that the casino could approximately 500 vehicle trips during the Friday PM commuter peak and approximately 750 vehicle trips during the anticipated Saturday peak times of the casino."

"The Stantec report assumes that 10% of the site traffic will use Route 117 to the east of I-190, though more detailed market analysis / trip distribution figure presented by the project proponent indicates that approximately 13.5% of the site traffic will use Route 117 to the east of I-190, with approximately 11% traveling through the Town of Bolton. There was no study of Route 117 to the east of I-190 submitted thus far by the Applicant to evaluate the potential impacts of this additional traffic."

“Route 117 is the primary route through Bolton that would be used to access the Leominster site. It is primarily a two lane highway. Based on general observations and knowledge of the corridor, it operates with constraints at certain intersections (in particular, at the I-495 interchange, at Wattaquodock Hill Road in the Bolton Town Center, and the intersections with Route 70 and at Route 110 in Lancaster) during the weekday peak periods as well as during portions of Saturday.”

“Access connection – The proposed casino site is situated approximately 5 miles from the Bolton town line, and approximately 7.5 miles from the center of Bolton. Route 117 provides a direct route from the Town of Bolton to the casino site, and also provides a direct route through Bolton from I-495 to the casino site.”

“Projected changes level of service (LOS) – There was no analysis done for Route 117 in Bolton (or Lancaster) by the Applicant. However, there are times under existing conditions that congestion and motorists delays are experienced, particularly during weekday peak hours and some weekends periods. Based on the Applicant’s market study and estimated trip distribution pattern presented to the MGC, this would amount to approximately 56 vehicle trips during the PM peak hour and approximately 83 vehicle trips during the Friday/Saturday peak hours of the casino in on Route 117 near I-495 and building slightly as one moves west towards the casino. Those locations that currently experience long delays will continue to do so with the project. At these levels, there would not be a noticeable change in congestion and delays at the existing traffic signals along the route, however, it may have a noticeable at the key unsignalized intersections. As discussed below, there is a high probability that use of I-495 and Route 117 has been underestimated and these noted traffic increases would be greater.”

“Increased traffic volumes on local streets – Based on the Applicant’s 11-13% estimate on Route 117 (depending on corridor location), it would result in approximately 56-65 additional vehicle trips on the roadway during the PM peak hour and approximately 83-100 during the casino peak periods on Friday/Saturday evenings. At these levels, the increases in traffic on Route 117 are estimated to be approximately 3–7% during the different peak hours, depending on where one is along the Route 117 corridor.”

“In light of several factors including the relatively close proximity that Bolton is to the proposed casino site; the direct route that Route 117 provides between I-495 and the project site, and the “reach” of the casino being between 60 and 90 miles and that there would not be any other nearby competing facility, it is conceivable in our opinion at this stage that the Applicant’s trip projections

to/from the east along Route 117 may be low. Furthermore, based on graphics presented by the applicant showing the market analysis, there are many communities in southeastern Massachusetts that would more likely use I-495 and Route 117 to access the project site, rather than the route assumed by the applicant (I-95 and Route 2). It is likely that patrons of the site would avoid the I-95/Route 2 route due to the more congested conditions often experienced on I-95 relative to I-495, and the several “bottlenecks” along Route 2 in the towns of Lincoln, Concord, and Acton (i.e. traffic signals along Route 2 and/or the Concord Rotary). While this needs further review in the MEPA process, the potential exists that peak hour traffic would increase beyond the 3-5% estimated by the applicant. It is conceivable that Route 117 in Bolton could provide access for 20 percent of more of the casino related trips. If that were to occur, the increases in traffic on Route 117 would exceed 5% and approach and exceed 10% during certain periods and become a more significant and measurable impact.”

“Anticipated degradation on infrastructure – The Applicant has stated that construction related heavy vehicle traffic would be controlled and remain on the area’s major roadways. With I-190 adjacent to the site, this would be expected to provide the major route of access for transporting materials to the site, particularly long haul trips. However, there is the potential for I-495 use and with that, the potential for Route 117 to be used by “non-local” construction traffic. While it is fairly early in the process to know definitively the sources of materials, construction traffic and the source of materials, would be controlled to a large degree by the Applicant. This would be important with respect to minimize the potential use of Route 117 by this type of traffic.”

“Significant peak vehicle generation on State and Federal highways – The two highways of concerns in this factor as it relates to the Town of Bolton would be I-495 and Route 117. Based on the applicant’s market analysis results, 7.8% of all traffic is expected to use I-495 south the Route 117 interchange in the Town of Bolton. As discussed above, it is likely that the applicant’s market study underestimates the additional traffic volume on I-495, due to the desire to avoid more congested conditions on I-95 and Route 2. However, at 8% of the total site generation or even if double, the peak level of casino traffic on I-495 south of Route 117 would be as low as 40 vehicle trips to as high as 135 vehicle trips. Given the current levels of volume on I-495, the relative increases would be small.”

“For Route 117, the amount of casino traffic could range from approximately 11% near I-495 to approximately 13% between the Town Center and Route 110 – again based on the Applicant’s studies. This results in peak flows on Rote 117 of 56 to approximately 100 vehicle trips depending on the corridor location and peak

time period. If the Applicant's projections are underestimated as discussed above, the increases on Route 117 in Bolton would range from approximately 100 to 150 vehicle trips during either the weekday PM peak of the Friday/Saturday peak hours of the generator. These estimated increases as well as the relative increases to the current roadway volumes would be measurable and become more significant."

"As a result of the level of casino related traffic estimated to pass through the Town of Bolton while traveling to the casino site, based on the information that has been reviewed and evaluated, and based on the above factors considered in this surrounding community evaluation, it is our opinion that there would be a significant and adverse traffic impact."

A. COMMUNITY PETITION

As detailed below, the Town of Bolton will be significantly and adversely affected by the Proposal. Route 117 through Bolton provides ready access to Leominster from Route 495 and the large volume of traffic and accompanying public safety issues that the Town currently experiences will be exacerbated by the Proposal.

Current Conditions on Route 117

Although Route 117 is a state highway it has been maintained by the Town of Bolton since the 1950s (except where the road crosses Route 495). Route 117 west of Route 495 is a two-lane road that includes turning lanes only at only two intersections in Bolton.

Currently, Route 117 carries a massive volume of traffic through Bolton to and from the west, most of which is headed north and south on Route 495 and with one third continuing east on Route 117. Bolton's 2006 Master Plan noted: "At a primary intersection in town, Main Street at Wattaquadock Hill Road, approximately 23,800 vehicles travel daily along Main Street east of Wattaquadock Hill Road and 19,100 vehicles travel west of it." In addition to automobiles, Route 117 is also used by many large trucks seeking a "short cut" to Route 495.

Attached as Exhibits C & D are traffic counts on Route 117 at the north-bound and south-bound exits from Route 495, which were conducted by the Highway Division of the Massachusetts Department of Transportation on October 10, 2013. They reveal that during the peak morning rush hour on Route 117, 1,494 cars head east with 724 (49%) turning south on 495, 301 (20%) headed north on 495 and 468 (31 %) continuing east on Route 117 toward Stow.

The evening rush hour on Route 117 is similar with 800 cars exiting from 495 North onto Route 117 during the peak hour, and 199 cars exiting from 495 South. While the peak hours for the north and south exits differ slightly, the net result is a nearly three hour evening rush hour on Route 117 in Bolton between 4PM and 7PM. Along the one mile stretch from Route 495 west to the intersection between Main Street and Wattaquadock Hill Road traffic slows to 10-15 miles per hour.

West of Wattaquadock Hill Road, traffic speed increases but the high volume makes entry onto to Route 117 from driveways, cross streets and Nashoba Regional High School extremely difficult. Attached as Exhibits E & F are a 2010 analysis and a traffic count by the Central Transportation Planning Staff of the Boston Regional Metropolitan Planning Organization of the intersection of Routes 117 and 110, a location close to the Lancaster line. The peak-hour, through-traffic count headed west into Lancaster was 897. The speed and volume of traffic at that location has resulted in an intersection with a much higher than average "crash rate." See Exhibit E, p. 4.

The volume of traffic on Route II7 requires police personnel to assist traffic exiting the Florence Sawyer and Emerson Schools and the Nashoba Regional High School nearly every day. Local residents often make long detours on Bolton's narrow back roads to avoid traffic slow-downs on Route II7.

On a daily basis, the evening backup on Route 117 west-bound causes traffic exiting from 495 North to back up the ramp onto the shoulder of the interstate, creating a severe public safety hazard. MassDOT is currently widening the exit ramp onto Route 117 to seek to address this issue.

The Applicant's Proposal

As detailed in its RF A-2 Application and in public statements to the Commission, the contours of Applicant's Proposal are as follows: The Applicant plans a gaming establishment on Jungle Road in Leominster that will operate 24 hours a day, seven days a week. Expectations are that it will draw 2,400,000 visitors annually, with the "vast majority" coming from outside the local area but within a 60 mile radius. The Applicant claims considerable experience in this field. It advised the Commission, in its initial presentation, "We know how to draw traffic to our projects."

The facility will include 1,250 slot and video poker machines with a total of 1,400 gaming positions. In addition to a large central bar, three restaurants are planned. A 430-seat music venue will feature live performances six or seven nights per week and according to the Applicant "will be a magnet for entertainment and tourism patrons."

Parking initially will consist of 936 surface spots. According to the Applicant, the Proposal will result in 8, 130 new vehicle trips daily. No distribution of this traffic over the 24 hours the facility will be open was provided by the Applicant. The Applicant has also failed to detail the anticipated volume or timing of bus traffic to its facility.

The Applicant's traffic impact study states, however, that "casino weekday traffic peak occurs on Fridays and the absolute peak hour occurs on Saturday evenings. Casino traffic volumes are high during the afternoon commuter and early evening hours and may be even higher during late evening hours on Fridays and Saturdays." See PPE 5-02-02 Traffic Impact Study, p. 17.

Potential future expansion outlined by the Applicant includes a 264 room hotel with a 750 space parking structure and 16,400 square feet of meeting and exhibition space. See PPE 4-12-01 Master Plan.

Errors and Oversights in Applicant's Analysis: Source of Casino Traffic

The traffic study filed by the Applicant (PPE 5-02-02 Traffic Impact Study) includes, at pages 22-24, a trip distribution analysis. Potential patrons within a 90 minute drive from the proposed facility were identified and weighed based on income level, travel distance and presence of competing facilities.

"Contributions from each community were then combined based on the likely route patrons would use to travel from home to the Leominster site." PPE 5-02-02 Traffic Impact Study, p. 22 (emphasis supplied). The resulting analysis is shown in Figure 11 of the traffic report, which is reproduced on the attached as Exhibit G.

The conclusion of the trip distribution analysis is that patrons will reach the proposed facility by the following routes:

Route 117 from the west (downtown Leominster)	1%
Route 117 from the east (Lancaster/Bolton)	11%
Route 190 from the north (Route 2)	72%
Route 190 from the south (Worcester)	16%

A close reading of Exhibit G (Figure 12) reveals the source of the unlikely claim that 72% of patrons will arrive by traveling south on Route 190 from Route 2. The area in light blue is designated as arriving from I-190 South and Route 2 east. This area includes all the high population centers to the east of Leominster including the City of Boston, the western suburbs and South Shore towns down to Duxbury. For every one of the cities and towns in eastern Massachusetts in light blue on Figure 12, the Applicant is claiming that every single resident who visits the facility will travel east on Route 2 to Route 190 South.

Such a claim is counter to common sense and to the experience of those who live and regularly travel west of Boston. Individuals with ready access to the Mass Pike make use of that road. By contrast, Route 2 between Route 95 and the Concord rotary – with multiple stop lights and long delays - is to be avoided, unless no alternatives exist. Attached as Exhibit H is an illustration of two routes to the proposed facility from Boston. The "likely" route identified by the Applicant is marginally shorter than using the Mass Pike but in reality far slower because of the many traffic lights and ongoing construction delays on Route 2 through Concord. It is unlikely that any savvy travelers from Boston, the suburbs along the Pike or the South Shore will take Route 2 to Route 190 South, much less that every single visitor will, as the Applicant claims.

Once the Leominster-bound traveler reaches the Mass Pike exit at Route 495 the route to the proposed facility leads through Bolton. Exhibit I illustrates the alternatives available to a potential patron who has reached the intersection of Routes 90 and 495. Taking Route 117 through Bolton saves nearly 14 miles over the 495/2/190 alternative and almost 16 miles over the 495/290/190 choice.

Correcting the Applicant's trip distribution analysis to coincide with reality will make a significant difference in what percentage of visitors use Route 117 through Bolton to reach the facility. The close-in Boston suburbs contain large populations and great wealth. The Town of Bolton estimates that between 30% and 45% of patrons will actually reach the Applicant's facility by traveling Route 117 through Bolton.

Errors and Oversights in Applicant's Analysis: Applicant's "Smoothing" of Trip Distribution Data

With the justification that employee trips will be drawn more heavily from Leominster and not all patron trips will originate at or return to residences, the Applicant "smoothed" the data as follows:

	Calculated	"Smoothed"
Route 117 from the west (downtown Leominster)	1%	9%
Route 117 from the east (Lancaster/Bolton)	11%	10%
Route 190 from the north (Route 2)	72%	60%
Route 190 from the south (Worcester)	16%	20%
Old Mill Road	---	1%

See PPE 5-02-02 Traffic Impact Study, pp. 23-24. These arbitrary adjustments ignore the fact that visits that originate from workplaces will overwhelmingly come from the Route 495 area as well as Boston suburbs with access to the Mass Pike, and go through Bolton on Route 117.

Errors and Oversights in Applicant's Analysis: Overly Narrow Traffic Analysis

Perhaps because of its flawed trip distribution analysis, the Applicant confined its traffic impact study to the area of Route 117 immediately adjacent to the proposed facility. See PPE 5-02-02 Traffic Impact Study, p. 3. This analysis is so narrow as to be meaningless. The conclusion there "are no capacity constraints along Route 117 which would need to be addressed to mitigate project related traffic impacts," PPE 5-33-01 Traffic Control Measures, is only true in relation to the 14 mile stretch of Route 117 west of Route 190.

The Applicant should couple a sincere estimate of traffic flow with a traffic study of the entire 8-mile length of Route 117 from Route 495 to Route 190.

Tellingly, in the Certificate of the Secretary of Energy and Environmental Affairs on the Environmental Notification Form for this Proposal (a copy of which is attached as Exhibit J) the Secretary repeated comments from MassDOT that the traffic study in the Environmental Impact Statement should be expanded and include the intersection of Routes 117 and 70 in Lancaster as well as the Route 117 and Route 495 north-bound and south bound ramps in Bolton. Id. p. 9.

MassDOT's comments in Exhibit J independently confirm what Bolton residents know instinctively: vehicles from the Proposal will have a significant impact on traffic on Route 117 in Bolton.

Bolton's Transportation Infrastructure Will Be Significantly and Adversely Affected

It is beyond dispute that Route 117 will provide ready access to the proposed establishment for traffic off Route 495. The Applicant's traffic impact study concedes that its Proposal will result in a quarter million new vehicle trips annually through Bolton (11% of 2.4M). As detailed in Section IV(A) above, the unjustified assumptions in Applicant's trip distribution analysis result in the understating the actual volume of traffic that will pass through Bolton by a factor of three or four. Whether the number of new annual vehicle trips resulting from the proposal is 250,000 or 1,000,000 or something in between, however, that new traffic have a profound adverse impact on Bolton and will continue to degrade the quality of life for Bolton residents.

With traffic crawling through Bolton Center every evening the level of service is already poor on Route 117. Because the scope of Applicant's traffic impact study was so narrowly constrained, no information was generated on intersections in Bolton. It is certain, however, that additional traffic volume will degrade the level of service at intersections on Route 117 in Bolton, including Mechanic Street (the sole access to the Florence Sawyer and Emerson Schools) and at Green Road, adjacent to the Nashoba Regional High School. See Exhibit B. The intersection of Routes 110 and 117 is already in need of an upgrade, see Exhibit E, and more traffic will make that need more urgent.

The fact that weekday peak traffic at the facility will coincide with the evening rush hour and that many weekday visitors will be coming from work, will mean even more pronounced rush hour delays in Bolton and cause more pressure on Bolton's narrow and historic side streets as locals take detours to avoid Route 117. As noted above, MassDOT's recommendation that the traffic study in the Environmental Impact Statement should be expanded to include the Route 117 and Route 495 north-bound and south bound ramps in Bolton, Exhibit G , p. 9 , is evidence of its concern that the Proposal's potential impact on those intersections has been overlooked.

B. APPLICANT RESPONSE

THERE ARE NO SIGNIFICANT AND ADVERSE IMPACTS ON THE TRANSPORTATION INFRASTRUCTURE OF THE TOWN

PPE's market study and traffic study show there will be very limited impacts to roadways in the Town and that these impacts will be solely limited to Route 117 as a link between the Project and I-495. Project related traffic impacts along Route 117 will be less than one vehicle per minute (less than one eastbound vehicle every two minutes and less than one westbound vehicle every two minutes) during the weekday afternoon commuter peak hour.

The Petition draws attention principally to the Route 117/I-495 interchange at the eastern side of Town and the Route 110/Route 117 intersection at the western side of Town. Detailed operations analysis results are not provided for the Route 117/I-495 interchange, however, commuter peak hour congestion is reported. The interchange, while located in the Town, is owned and maintained by MassDOT. The Town notes that MassDOT is in the process of making improvements to this interchange to help better manage existing traffic demands. MassDOT has asked PPE to further study the expected impacts of the Project at this interchange as part of the Environmental Impact Report that will be prepared for the Project as required by the Massachusetts Environmental Policy Act.

Traffic studies completed to date show that the Project will increase volumes at the Route 117/I-495 Northbound Ramps intersection by only 2.2%. (An estimated 54 PM peak hour vehicle trips will be added to the existing 2480 vehicles trips passing through the intersection as reported by the Town.) Generally, a 10% increase in traffic volumes is necessary to realize a full letter-grade change in level of service (LOS) at a signalized intersection. (Intersection operating levels of service can be determined applying procedures described in the Highway Capacity Manual on a scale of A to F with A representing free flow conditions and F representing heavily congested conditions.) Consequently, Project related traffic impacts at this location are not significant. Regardless, the limited impacts will occur on a roadway segment that is owned by the Commonwealth of Massachusetts and not the Town.

The Town has provided detailed traffic volume data and operations analyses for the Route 110/Route 117 intersection at the western edge of Town. A traffic safety study completed for the Town by the Commonwealth's Central Transportation Planning Staff notes 1630 PM peak hour vehicles per hour entering this intersection. It also reports that the intersection operates at LOS C during the PM peak hour. Not related to the Project, improvements are currently proposed that will result in the intersection operating at LOS B under future conditions. The addition of 54 PM peak hour Project trips at this location, less than one vehicle per minute, represents a very modest 3.3% increase in traffic volumes. With baseline operations expected to be at LOS B, the added volume will have only nominal impacts on traffic delays and congestion and will not result in a full letter-grade change in level of service at any intersection.

As noted above, the Route 117 roadway segment between I-495 and Route 110 is also expected to carry 54 PM peak hour casino related vehicle trips. However, along this segment there are no signalized intersections that would impede through traffic volumes. The Town reports that it does use police details at certain school driveways to help traffic exit school property during peak school hours. Since these details are being used under existing conditions and Project traffic during key school hours is less than the average hourly Project trips, the need for these details cannot be associated with casino traffic.

In the absence of any signalized locations to analyze that would interrupt traffic flow, the capacity of the two-lane roadway segment from I-495 to Route 110 can be considered. The theoretical capacity of a two-lane, two-way highway per the Highway Capacity Manual is 2800 vehicles per hour. The anticipated 54 added vehicle trips associated with casino will use less than 2% of this capacity. This modest change will not significantly and adversely affect roadway operations.

The above traffic analyses repeatedly refer to a 54 vehicle per hour traffic increase on Route 117. This is the expected traffic increase based on total PM peak hour traffic generation for the Project of 504 Friday, commuter peak hour trips with 11.1% of these trips using Route 117 from I-495 to the Town/Lancaster town line. Project traffic is countercyclical- peak casino traffic is between 8 pm and 11 pm, after the PM commuter peak hour with nominal traffic volumes during the AM commuter peak hour. Project traffic generation will be less than 54 trips during weekday commuter peak periods.

The Petition questions the 11.1% share of site trips assigned to Route 117 given the greater population density of municipalities east of I-495. This figure is derived from a market study that forecasts annual casino visits by municipality. The study assumes that a Category 1 casino will be constructed in eastern Massachusetts reducing traffic to the Project from areas closer to the Category 1 casino. Consequently, communities east of I-495 will not contribute as heavily to the Leominster "market" as their populations indicate.

Another factor to consider in deriving the 11.1% figure is route assignment. Use of Route 117 was assumed to be the most convenient route for casino access for motorists who are already on I-495. However, motorists traveling from a greater distance who are less familiar with the more local roadways are likely to be reluctant to use Route 117. (This will be particularly true during the weekday PM commuter peak hour when volumes are heaviest.) The traffic study therefore assumes that much of the casino traffic generated east of Route 128 will follow major routes using Route 128 to reach Route 2 or I-90 and then follow these roads west to I-190. In fact, for a trip from Logan Airport to the Project site, the typical in car GPS system routes the driver to I-90 to Route 128/I-495 to Route 2 to I-190. The attractiveness of Route 2 is likely to increase over time as improvements at Crosby Corners in Concord are completed and others are initiated at the Concord rotary and, most importantly, the regular repeating Project patron avoids the commuter

peak traffic on Rt. 117. Consequently, the 11.1% share of casino trips assigned to Route 117 for the PM peak hour is reasonable

C. RPA ANALYSIS

MONTACHUSETT REGIONAL PLANNING COMMITTEE

REGIONAL REVIEW OF ENVIRONMENTAL NOTIFICATION FORM (ENF) FOR INFORMATIONAL PURPOSES: LIVE! CASINO, JUNGLE ROAD, LEOMINSTER

G. Eaton summarized the following: According to the proponent, the following issues are relevant to the proposed development of a slots-only-casino on Jungle Road, Leominster:

...

8. Traffic study Is being prepared
 - a. Interstate 190 and State Route 117 are now at 30-35% of capacity
 - b. At build-out Casino road capacity reaches up to 50%
 - c. All development, at build *out*, of the slots-casino and all other commercial areas in the Jungle Road vicinity will utilize up to 75% of the roads' capacity
9. There will be an estimated 8,100 cars per day "in-and-out " of the facility
10. After 7PM at night traffic picks up
11. The building will be smaller than the Wal Mart building located on Jungle Road and the new development will generate less traffic than the existing Wal Mart
12. 2 million visitors per year are anticipated
13. The market area is anticipated to be those households within a 40 minute travel time after the three, large casinos in MA open in eastern, south-central and western Massachusetts

Transportation Department Comments and Review

1. The study area should include numerous intersections in both Leominster and Lancaster that have the potential to be impacted by the development. Intersections that should be reviewed and considered include :

- Rt 117 /Rt 12 in Leominster
- Rt 117 /Viscoloid Ave in Leominster
- Rt 117/Willard St in Leominster
- Rt 117/Lowes in Leominster
- Rt 117/Transfer Station Road in Leominster
- Rt 117 /Jungle Road in Leominster
- Rt 117/1-190 SB On & Off Ramp in Leominster
- Rt 117/1-190 NB On & Off Ramp in Lancaster
- Rt 117/N. Main St in Lancaster
- Rt 117/Rt 70 N (Lunenburg Rd) in Lancaster
- Rt 117 /Rt 70S (Main St) in Lancaster
- Rt 117 /Harvard Rd in Lancaster
- Rt 117 /Rt 110 in Bolton
- Rt 117/1-495 in Bolton

- Jungle Rd/Oid Mill Rd in Leominster
- Willard St/Oid Mill Rd/Beth Ave in Leominster
- Rt 12/Willard St in Leominster
- Rt 12/Beth Ave/Grant St in Leominster
- Vicoloid Ave/Johnson St in Leominster
- Johnson St/Mechanic St in Leominster
- Mechanic St/Commercial Rd/Leominster Connector in Leominster
- Leominster Connector/Nashua St in Leominster

2. The intersections listed above are located along other potential routes to the development that should be considered for review and analysis. The ENF states that traffic will use Route 117 east and west of the site as well as 1-190 north and south. However, the following roads/routes do provide alternative connections to Route 117 and could likely see increases in traffic. These routes are as follows:

To the East :

- Rt 117 to 1-495: truck and chartered bus traffic
- Rt 117 to Rt 110: access to the north to Rt 2 in Harvard
- Rt 117 to Rt 70S (Main St)
- Rt 117 to Rt 70 N (Lunenburg Rd) : access to the north to Rt 2

To the West

- Rt 117 to Willard St to Rt 12
- Rt 117 to Viscoloid Ave to Johnson St to Mechanic St to the Mall at Whitney Field and Rt 2
- Rt 117 to Rt 12 to Mechanic St to Rt 2
- Rt 117 to Rt 12 to the north to NH
- Rt 117 to Rt 13 to the north to NH

3. The safety conditions within the study area should be investigated thoroughly. With a nearly 50% (7,700 new vehicles) estimated increase in ADT on Route 117 for this proposed project, an increase in the number and severity of crashes may occur on Route 117 and on the roadways listed above. Based on a review of MassDOT crash data over a 3-year period from 2008-2010 there are at least three high crash locations on the major streets that would be used to access Route 117 and one on Route 117. A comprehensive safety study based on the most recent 3-year period and on crash reports obtained locally should be completed that will reveal the existing crash experience of these roadways. The study would reveal any additional safety improvements that need to be implemented and the MassDOT crash data needs to be verified and updated.

4. Impacts along State Route 2 both east and west of and within a 45 minute "drive time" for patrons of the establishment (as stated by the proponent in a phone conversation between proponent and MRPC staff on Friday, August 23, 2013) should be addressed by the proponent through the ENF process. The 45 minute "drive time" to Jungle Road along State Route 2

extends from Orange to Concord (see map, below) . Interchange improvements and safety issues should be addressed by the traffic engineer for the proponent.

5. Although the project will not meet or exceed review thresholds related to air quality the nearly 50% increase in ADT has the potential of substantially increasing the length of vehicle queues thus increasing vehicular delay and engine idle time on the Route 117 intersections. Traffic flow improvements should be studied and implemented to compensate for the additional traffic at these intersections.

6. Future build out conditions for the impact study should include potential development at the Lowes site as well as the property across from Lowes that would be accessed through the existing traffic signal.

7 . Route 117 provides direct access to the east to 1-495 in Bolton. This would seem to be a prime access route for traffic from the southeastern part of the state. Bus services, both regular and chartered, as well as trucks seeking to access the development are also likely to utilize this connection. These impacts need to be reviewed and addressed.

8 . Bus and shuttle service connections from the North Leominster Commuter Rail Station will impact intersections and road conditions on the routes used to reach the site . These routes should be examined and identified.

9. Pedestrian and bicycle connections are mentioned for Jungle Road as part of the development. However, no facilities currently exist on Route 117 for bikes and pedestrians . Improvements and facilities are needed to make bike and pedestrian access viable.

10. If special events, i.e . concerts, etc., are planned at the site, special planning should be conducted to address potential impacts.

11. The MRPC is currently conducting a corridor profile for Route 117 in Lancaster. Potential improvements to identified issues will be recommended. Coordination with the town of Lancaster should be conducted as part of the overall mitigation process .

D. ENF ANALYSIS

The project site is located adjacent to the Interstate 190 (I-190)/Route 117 interchange. According to the ENF, access to the site will be provided via Jungle Road, which intersects Route 117 at a signalized intersection approximately 600 feet northwest of the I-190 southbound ramps. The site is located in an area that is experiencing significant growth as evidenced by the upgrading of Route 117 to accommodate retail development in the corridor.

The project has the potential to generate 8,130 new unadjusted vehicle trips on weekdays, including 500 new vehicle trips during the weekday PM peak hour and 530 new vehicle trips during the Saturday midday peak hour. The project requires a Vehicular Access Permit from MassDOT. Development of an effective transportation access and mitigation plan is critical to avoid potentially significant impacts to the regional transportation system and state roadways. Project planning should place equal emphasis on roadway improvements and TOM measures and pursue creative solutions to encourage both patrons and employees to use alternative modes of transportation. MassDOT provided detailed comments on the project and analysis required to assess impacts and develop adequate mitigation.

Comments from MassDOT state that the proposed Study Area for the traffic analysis should include, at a minimum the following intersections:

- Jungle Road and Route 117; [in Leominster]
- Jungle Road and Site Driveway(s); [in Leominster]
- Jungle Road and the WalMart Site Driveway; [in Leominster]
- Jungle Road and the secondary WalMart Site Driveway; [in Leominster]
- Jungle Road and Old Mill Road; [in Leominster]
- Route 117 and the 1-190 Southbound Ramps; [in Leominster]
- Route 117 and the 1-190 Northbound Ramps; [in Leominster]
- Route 117 and Route 70; [in Leominster]
- Route 117 and the Interstate 495 (I-495) Southbound Ramps; [in Bolton]
- Route 117 and the 1-495 Northbound Ramps; [in Bolton]
- I-495 and the Route 2 Interchange; and, [in Leominster]
- I-190 and the Route 2 Interchange. [in Leominster]

The Town of Westminster requests that the intersection of Routes 2 and 140 be included in the study area.

Roadway and Signalization Improvements

The ENF provides preliminary concepts for on-site vehicular access and for off-site roadway, traffic and safety improvements that will be developed in consultation with MassDOT and the

City of Leominster. It identifies improvements along Jungle Road and its intersection with Route 117 including the following:

- Installing a signal at the Jungle Road /WalMart Driveway and coordinating it with the existing signal on Route 117;
- Providing a dedicated left-turn lane on Jungle Road northbound at the main WalMart driveway;
- Providing a dedicated left-turn lane on Jungle Road westbound at Old Mill Road;
- Widening Jungle Road to provide minimum four-foot wide shoulders/bike accommodations;
- Installing a sidewalk along one side of Jungle Road; and
- Providing a raised median along Jungle Road to create a boulevard effect.

E. CONSULTANT ANALYSIS

GREEN INTERNATIONAL AFFILIATES, INC.

In response to MGC request, Green International Affiliates, Inc. (GREEN) has undertaken an evaluation of the petitions for being designated as a *Surrounding Community* with respect to the casino proposals. As part of the development of casinos in Massachusetts, a community may be designated as a Surrounding Community as per 250 CMR 125.00. The regulation specifies a number of considerations or factors to guide the determination of the designation and one of them include various traffic related impact factors. A number of communities have petitioned the MGC requesting designation in part or whole due to traffic related factors. These petitions that were received and remain in the review process include Fitchburg, Sterling, Bolton, Bridgewater, and Dighton. This report summarizes the evaluation of traffic impacts relative to Bolton.

Evaluation Process

The regulation identifies various factors related to transportation and traffic impacts to be considered in the evaluation. These include:

- Access connection
- Projected changes in level of service (LOS)
- Increased volume on local streets
- Anticipated degradation of infrastructure
- Adverse impacts on transit ridership/station parking
- Significant peak vehicle trip generation (weekdays/weekends) on state and federal highways

In relation to the ‘Anticipated degradation of infrastructure’, the potential likelihood of construction related traffic impacts on the roadway system located in the community petitioning for designation was ascertained as it is the heavier construction type vehicles that would affect the condition of road infrastructure.

In many cases, the Applicant’s traffic study did not extend far into nearby communities. In those situations, additional research was conducted to identify known traffic levels, relative safety conditions, connectivity, and potential level of impact. In addition, the written reviews completed by the regional planning agencies (RPAs) and MassDOT in the MEPA process were taken into account as well relative to the applicable areas of concern.

- Access connection – This looks at the physical link between the site and the community as well as the approximate distance to the center of the community.
- Projected changes level of service (LOS) – This defines an operating condition of a roadway or intersection. The levels range from LOS ‘A’ to LOS ‘F’ with the highest level with minimal or short motorist delays being LOS ‘A’ to the lower levels that would represent very long motorist delays & potential capacity constraints at LOS ‘E’ and ‘F’. A change from one to another may not signify a problem.
- Increased traffic volumes on local streets – This examines the level of traffic volume that is estimated to occur due to the project onto local streets. In this evaluation, local streets would consider non-interstate or interstate-like facilities. They could be local arterials or collector type roads both State numbered routes or not.
- Anticipated degradation on infrastructure – Degradation of a roadway generally relates to the pavement or driving surface. It is affected not just by the number of vehicles, but the level of heavy vehicle traffic.
- Significant peak vehicle generation on State and Federal highways – This will identify the estimated casino related traffic that is expected to be added onto State and Federal highways that would also be located in the potentially affected community.

Petitioning Community: Bolton

The Town of Bolton has submitted a petition to be designated as a “Surrounding Community” with respect to the proposed “Live! Casino Massachusetts” Slots Casino proposed in Leominster. The following summarizes our review with respect to the above factors.

- Applicant Traffic Study

The Applicant (PPE) has submitted a traffic study by their consultant (Stantec) that provided their assessment of traffic conditions resulting from the proposed casino. The study was completed as part of the Applicant's effort to obtain acceptance by the host community. It was later submitted as part of the Environmental Notification Form (ENF) to MEPA that begins the State's environmental study process.

Note:

The Stantec traffic study examined locations only within Leominster. The information provided in the study or other sources within the Application does not provide a substantial amount of information relative to the potential traffic impact on Bolton.

- RPA/MassDOT Comments

Comment letters and memoranda prepared by MassDOT and the Montachusett Regional Planning Commission (MRPC) were reviewed to obtain any potential insights or concerns related to the proposed casino and the impact on Bolton.

MassDOT comments to date have been in relation to the ENF filed by the Applicant. Comments from MassDOT, and contained in the ENF Certificate, indicate that at a minimum, the DEIR should include both signalized intersections at the I-495 / Route 117 interchange in the Town of Bolton. This is directly due to the levels of casino-generated traffic as presented to date by the Applicant that would travel to the project site in Leominster via I-495 and Route 117 from the south and east, respectively. It should be noted that MassDOT also requested additional supporting documentation in relation to the Applicant's forecasts.

The MRPC did not make formal comments to MEPA as part of the ENF review process. However, the casino project was discussed at an August meeting of the MRPC. In that meeting, various issues were identified for the purpose of potential analysis in the MEPA project. These included the Route 117 corridor to I-495 in Lancaster and Bolton as well as several of the Route 2 interchanges including those in Westminster.

Notes:

The major route of potential concern in Bolton is Route 117 with portions under State and portions under Town jurisdiction.

The Town of Bolton did not submit any comments to MEPA as part of the ENF review.

- GREEN Analysis

As part of the Green analysis, information contained in the Stantec traffic study as well as other information such as the Market Analysis included in the PPE application were reviewed for relevant information. Additionally, data and reports available through MassDOT and the MRPC were reviewed to obtain additional information to help address the factors. Prior to the review of the factors with respect to Bolton's petition, a brief summary of information relative to the proposed Leominster casino.

The proposed casino is located on Jungle Road that is in close proximity to Route 117 and I-190 all in Leominster. Route 117 connects Leominster with the town of Bolton (traveling through Lancaster). The Leominster / Lancaster town line is approximately 0.3 miles to the east of the project site, and the Lancaster / Bolton town line is approximately 4.6 miles further east. The Stantec study estimated that the casino could approximately 500 vehicle trips during the Friday PM commuter peak and approximately 750 vehicle trips during the anticipated Saturday peak times of the casino.

The Stantec report assumes that 10% of the site traffic will use Route 117 to the east of I-190, though more detailed market analysis / trip distribution figure presented by the project proponent indicates that approximately 13.5% of the site traffic will use Route 117 to the east of I-190, with approximately 11% traveling through the Town of Bolton. There was no study of Route 117 to the east of I-190 submitted thus far by the Applicant to evaluate the potential impacts of this additional traffic.

Route 117 is the primary route through Bolton that would be used to access the Leominster site. It is primarily a two lane highway. Based on general observations and knowledge of the corridor, it operates with constraints at certain intersections (in particular, at the I-495 interchange, at Wattaquadock Hill Road in the Bolton Town Center, and the intersections with Route 70 and at Route 110 in Lancaster) during the weekday peak periods as well as during portions of Saturday.

The following summarizes our analysis against the factors in 250 CMR 125.00:

- Access connection – The proposed casino site is situated approximately 5 miles from the Bolton town line, and approximately 7.5 miles from the center of Bolton. Route 117 provides a direct route from the Town of Bolton to the casino site, and also provides a direct route through Bolton from I-495 to the casino site.
- Projected changes level of service (LOS) – There was no analysis done for Route 117 in Bolton (or Lancaster) by the Applicant. However, there are times under existing conditions that congestion and motorists delays are experienced, particularly during weekday peak hours and some weekends periods. Based on the Applicant's market study and estimated trip distribution pattern presented to the MGC, this would amount to approximately 56 vehicle trips during the PM peak hour and approximately 83 vehicle trips during the Friday/Saturday

peak hours of the casino in on Route 117 near I-495 and building slightly as one moves west towards the casino. Those locations that currently experience long delays will continue to do so with the project. At these levels, there would not be a noticeable change in congestion and delays at the existing traffic signals along the route, however, it may have a noticeable at the key unsignalized intersections. As discussed below, there is a high probability that use of I-495 and Route 117 has been underestimated and these noted traffic increases would be greater.

- Increased traffic volumes on local streets – Based on the Applicant’s 11-13% estimate on Route 117 (depending on corridor location), it would result in approximately 56-65 additional vehicle trips on the roadway during the PM peak hour and approximately 83-100 during the casino peak periods on Friday/Saturday evenings. At these levels, the increases in traffic on Route 117 are estimated to be approximately 3–7% during the different peak hours, depending on where one is along the Route 117 corridor.

In light of several factors including the relatively close proximity that Bolton is to the proposed casino site; the direct route that Route 117 provides between I-495 and the project site, and the “reach” of the casino being between 60 and 90 miles and that there would not be any other nearby competing facility, it is conceivable in our opinion at this stage that the Applicant’s trip projections to/from the east along Route 117 may be low. Furthermore, based on graphics presented by the applicant showing the market analysis, there are many communities in southeastern Massachusetts that would more likely use I-495 and Route 117 to access the project site, rather than the route assumed by the applicant (I-95 and Route 2). It is likely that patrons of the site would avoid the I-95/Route 2 route due to the more congested conditions often experienced on I-95 relative to I-495, and the several “bottlenecks” along Route 2 in the towns of Lincoln, Concord, and Acton (i.e. traffic signals along Route 2 and/or the Concord Rotary). While this needs further review in the MEPA process, the potential exists that peak hour traffic would increase beyond the 3-5% estimated by the applicant. It is conceivable that Route 117 in Bolton could provide access for 20 percent or more of the casino related trips. If that were to occur, the increases in traffic on Route 117 would exceed 5% and approach and exceed 10% during certain periods and become a more significant and measurable impact.

- Anticipated degradation on infrastructure – The Applicant has stated that construction related heavy vehicle traffic would be controlled and remain on the area’s major roadways. With I-190 adjacent to the site, this would be expected to provide the major route of access for transporting materials to the site, particularly long haul trips. However, there is the potential for I-495 use and with that, the potential for Route 117 to be used by “non-local” construction traffic. While it is fairly early in the process to know definitively the sources of materials, construction traffic and the source of materials, would be controlled to a large degree by the Applicant. *This would be important with respect to minimize the potential use of Route 117 by this type of traffic.*

- Significant peak vehicle generation on State and Federal highways – The two highways of concerns in this factor as it relates to the Town of Bolton would be I-495 and Route 117. Based on the applicant’s market analysis results, 7.8% of all traffic is expected to use I-495 south the Route 117 interchange in the Town of Bolton. As discussed above, it is likely that the applicant’s market study underestimates the additional traffic volume on I-495, due to the desire to avoid more congested conditions on I-95 and Route 2. However, at 8% of the total site generation or even if double, the peak level of casino traffic on I-495 south of Route 117 would be as low as 40 vehicle trips to as high as 135 vehicle trips. Given the current levels of volume on I-495, the relative increases would be small.

For Route 117, the amount of casino traffic could range from approximately 11% near I-495 to approximately 13% between the Town Center and Route 110 – again based on the Applicant’s studies. This results in peak flows on Rote 117 of 56 to approximately 100 vehicle trips depending on the corridor location and peak time period. If the Applicant’s projections are underestimated as discussed above, the increases on Route 117 in Bolton would range from approximately 100 to 150 vehicle trips during either the weekday PM peak of the Friday/Saturday peak hours of the generator. *These estimated increases as well as the relative increases to the current roadway volumes would be measurable and become more significant.*

Concluding Opinion

As a result of the level of casino related traffic estimated to pass through the Town of Bolton while traveling to the casino site, based on the information that has been reviewed and evaluated, and based on the above factors considered in this surrounding community evaluation, it is our opinion that there would be a significant and adverse traffic impact.

F. APPLICATION

2-19

Based on the assumption that the Project opens July 1, 2015, the Region A & B Category I Facility opens January 1, 2018 and the Region C Category I Facility opens January 1, 2019, the projected best, average and worst case revenue projections for the first 5 years of the project's operations are noted in 2-19-1. Please note the Market Study completed by Signature Advisory Services uses a January 1st, 2016 date for opening of the Leominster facility. The study was completed prior to determining that the facility could be completed by July 1, 2015. The 5 year revenue estimates calculated are still accurate, they just occur earlier than originally contemplated.

2-23

Neither the Applicant nor any of its members have interests in any gaming establishment within 300 miles of the proposed Massachusetts Live! Casino in Leominster. A related entity currently has an application pending for a casino license in Philadelphia, Pennsylvania, slightly more than 300 miles from the Leominster location. Applicant considers the Philadelphia market separate and distinct with no impact by one facility on the other.

2-26

PPE selected Leominster as the ideal location for the Category 2 license due to its strategic location off I-190 in North Central Massachusetts. This location compliments the planned sites for the three Category 1 licenses, and ensures the maximization of revenues to the Commonwealth, including maximizing the recapture of gaming revenue currently leaving the Commonwealth. PPE projects that \$95.1 million of gaming revenue, or approximately 10.8% of its total currently projected gaming revenue spent by Massachusetts residents out-of-state will represent repatriated Massachusetts dollars, prior to the opening of the Category 1 licensed facilities. Approximately \$459.2 million of repatriated gaming revenues are projected between PPE's Leominster facility and the three Category 1 Licensed facilities once open, or approximately 52.47% of money Massachusetts residents spend.

2.28

PPE selected the project site due to its strategic location at I-190 and Route 117 in North Central Massachusetts and the substantial infrastructure and capacity in place to accommodate the Project. Therefore, PPE anticipates nominal capital investment requirements outside the project site boundaries.

2-32

Massachusetts Live! Casino's primary market will be the adult population which lives within a 60 mile radius of the project. Its secondary market will be the adult population within a 100 mile radius of the project and tourists traversing North Central Massachusetts. The marketing plan for

the Project will be a comprehensive program to maximize revenues during all day and week parts and seasons, and includes a mix of regional advertising, targeted database marketing programs, (including our LIVE! Online Casino, play for free internet site), partnership with regional community organizations, and regional and state tourism agencies, gaming and retail promotions, nightly entertainment, bus and tour business, year round banquet sales and VIP programming.

2-35

The Project will provide significant benefits to both the Commonwealth and local economies. PPE will create 1207 direct jobs and over 600 indirect and induced spin-off jobs. During construction, the project will create \$212.9 million in total economic output. After opening, the project will employ over 600 direct employees and create 352 indirect jobs and generate approximately \$1.1 billion in taxes and fees to Commonwealth and local governments during its first ten years. PPE anticipates that approximately \$18.5 - \$21.5 million in goods and services will be purchased for operations on an annual basis, and that approximately 86% of that total will be spent within the Commonwealth of Massachusetts. PPE has already begun an outreach program to local businesses and will continue to outreach to local businesses through website registration, vendor fairs, local chambers of commerce and media advertising to encourage bidding on casino contracts and to maximize participation by local and Commonwealth businesses in Project contracts.

2-36

Massachusetts Live! Casino's primary market will be the local/regional suburban demographic. Its secondary market will focus on out-of-state business. Efforts to attract out-of-state visitors will be focused on localized advertising, including accessing Maryland Live!'s database. These marketing programs would include targeted direct mail / internet campaigns, promotions and giveaways, live entertainment, partnership with local community organizations, VIP events, and year round banquet sales. The Leominster location positions Massachusetts Live! as an appealing alternative for VT, NH, and ME customers that are currently traveling much further to casinos in CT, NY, and RI. Massachusetts Live! will also leverage close to 1,000 hotel rooms located at 8 existing hotels within 10 miles of the property to attract out of State visitors. Additionally, out of State customers would potentially be attracted to the Massachusetts Live! property through bus programs. Currently, the Maryland Live! Casino utilizes bus programs with national operators including Abbott, Academy, DC Trails, Martz, Stagecoach, Fullerton, Stouts, Raritan Valley, Trailways, and Coach to attract customers from VA, NC, PA, DE, NJ, and NY. Some of these same operators will also be available to service regional bus groups at Massachusetts Live!.

2-37

Massachusetts Live! Casino will be where the suburban locals choose to play. PPE will deploy a sophisticated marketing plan that develops and maintains loyal and frequent local casino customers. The overall plan will comprise Brand Management, Localized Multi-media Advertising, Database Management, Local Sponsorship, Community Events, Integrated

Promotions and Events, Fluid nightly Entertainment Programs, Comprehensive Communications, Bus and Tour Operations, Banquet and Convention Sales, Rewards Club Management and VIP Player Services. As such, the attached marketing plan in section 02-34-01 will be the driving plan for the In-State market.

4-23

The Project site enjoys convenient access from the regional roadway system allowing traffic to leave the project site without significantly impacting the local roadway system. The site abuts Interstate Route I-190 and the site entrance is located fewer than 4,000 feet from the I-190/Route 117 interchange by way of Route 117 (another state highway) and Jungle Road. Route 117 was recently reconstructed to include a minimum four-lane, median-divided cross section with additional turn lanes and traffic signals provided at major intersections. The improvements include double left-turn lanes into Jungle Road from Route 117 westbound, and double right-turn lanes for traffic leaving Jungle Road and returning to the I-190 interchange. Jungle Road was also rebuilt for a short distance south of Route 117 to provide a connection to a Wal-Mart Supercenter store. Jungle Road, south of the Wal-Mart Supercenter, will be widened and reconstructed to accommodate travel demands generated by the proposed slots facility. Cyclists and pedestrians will be accommodated within the reconstructed roadway. PPE will also work to extend the regional bus route, which presently connects downtown Leominster and the Wal-Mart store, to the proposed slots facility.

4-23-02

See Traffic Impact Study – Attached

4-24

The roadway system serving the project site has sufficient capacity to accommodate the traffic expected to be generated by the proposed development. Route 117 was recently widened and traffic signals were installed to serve expected traffic demands associated with a large retail development located just north of the proposed slots facility site, as well as significant background traffic growth. The traffic growth expectations considered in the roadway design process were never realized and the roadway system now has more than adequate capacity to serve the needs of the proposed facility. Independent of these findings, the Applicant will improve signage on Route 117 and install a new traffic signal on Jungle Road to better control site access. Also, Jungle Road in the site vicinity will be widened from its existing two-lane cross section to create a boulevard adding sidewalks and bike lanes to safely accommodate all travel modes. An extension of the existing bus route serving the site is proposed, as well as shuttle bus connections to downtown Leominster and Leominster's commuter rail station. Vehicle refueling facilities are not proposed on the project site, but are presently available at existing service stations located along Route 117. A new service station has been permitted and is being constructed directly opposite Jungle Road on Route 117, which can serve future slots facility

patron vehicle refueling needs. Electric vehicle charge stations will be provided on the project site.

4-24-02

See Traffic Impact Study – Attached

4-25

PPE will promote the use of alternative modes of transportation, including public transportation, with various infrastructure improvements and operational strategies. From an infrastructure perspective, Jungle Road will be widened to create accommodations for pedestrians and bicyclists. The proposed slots facility site plan incorporates a drop-off/pick-up area to accommodate public transit buses and shuttle buses that will be operated by the Applicant. These shuttle buses are expected to link the site with downtown Leominster and the Leominster MBTA commuter rail station. PPE will also work to extend the existing Montachusett Regional Transit Authority bus route that serves the area to the casino entrance.

4-31

Massachusetts Live! provides excellent access to the entire region's commercial districts due to its strategic location off I-190 and proximity to Route 2 and I-495.

5-2

A full traffic impact assessment of the proposed project has been prepared describing existing and future transportation system operating conditions with the proposed project built. The report also describes the mitigation measures that will be employed to reduce and mitigate anticipated vehicular traffic impacts. PPE expects to bear the full cost of mitigating project related traffic impacts imposing no cost on the host community and surrounding communities or the Commonwealth. This commitment will be solidified through preparation of the required MEPA Environmental Impact Report and related Section 61 Findings.

5-03-01

Host Agreement

5-33

The roadway system serving the Project site has sufficient capacity to accommodate the anticipated 8,130 daily vehicle trips expected to be generated by the proposed development. Route 117 was recently widened and traffic signals were installed to serve expected traffic demands associated with a large retail development located immediately north of the proposed slots facility site. That improvement anticipated background traffic growth, as well. Those significant traffic growth expectations were never realized and the roadway system now has more than adequate capacity to serve the needs of the proposed facility. Notwithstanding these findings, PPE will improve signage on Route 117 and install a new traffic signal on Jungle Road to better control site access. Jungle Road will also be widened from its existing two-lane cross

section to create a boulevard and adding sidewalks and bike lanes to safely accommodate all travel modes. An extension of the existing bus route serving the site is proposed, as well as shuttle bus connections to downtown Leominster and Leominster's commuter rail station. A construction management plan will be developed with state and local officials: to minimize construction traffic generation during peak traffic hours; to limit truck traffic to approved, designated routes; and, to ensure that construction workers park only on the site and/or in designated remote parking facilities. Written response Traffic Impact Study Construction Mitigation Package PPE Casino Resorts MA, LLC Final Application.

G. OTHER

NOVEMBER 14, 2013 – COMMUNITY COMMENTS AT PUBLIC MEETING

MR. DELANEY: Good morning, Mr.
 9 Chairman, members of the Commission. The
 10 reason that the town of Bolton asked to speak
 11 to you with regard to our petition is because
 12 that this is such an important issue to the
 13 town.
 14 Route 117 affects every aspect of
 15 life in Bolton. We're a town of 5000 people
 16 and already 23,000 cars a day go through it.
 17 In our petition, we attached a statement from
 18 our police chief who noted that the volume of
 19 calls we have is equivalent of a town four
 20 times our size, because of the volume of
 21 traffic we're already dealing with on Route
 22 117.
 ...
 12 Another extreme position that
 13 Cordish has taken was they have minimized
 14 traffic coming east on 117 in their traffic
 15 analysis. Looking through their traffic impact
 16 study, we identified it as Exhibit G in our
 17 petition, I think it is also figure 12 in their
 18 traffic study -- figure 11, excuse me. What
 19 they did in order to reach the conclusion that
 20 only 11 percent of the traffic headed to
 21 Leominster was going to go through Bolton, they
 22 have this is bizarre graphic, which says
 23 everyone from Boston, every single person from
 24 Boston, every single person from the South
 1 Shore is going to go up around Route 2.
 2 Some folks will do that. Some GPS's
 3 will tell you to go that way. But I think if
 4 you go through what people in Bolton know is if
 5 you take Route 2 through Concord, you do that
 6 once. And then you're going to find other
 7 routes.
 8 I work in Boston. I never would
 9 take Route 2 in Concord to get here even if the
 10 GPS says it's a mile or two miles shorter. So,
 11 they have grossly underestimated -- excuse me.
 12 This is Don Lowe, our town administrator who
 13 actually signed our petition. They have

14 grossly underestimated the volume of traffic.
 15 This is all proprietary data of theirs. They
 16 haven't pushed back.
 17 All they have said is no, it's 11
 18 percent. We're not going to explain. And
 19 really we're not going get that many people
 20 from Boston. But they didn't explain their
 21 data. They didn't do an analysis, for example,
 22 even if Bolton is right and half of that inner
 23 Boston traffic went out the Pike, the number
 24 would only be 13 percent.
 1 They didn't do that because we
 2 suspect we're right. And it's going to be --
 3 the volume of traffic is going to be 30 or 40
 4 percent coming on 117. And the map illustrates
 5 that as the direct access by a transportation
 6 infrastructure is 117 from 495.
 7 In concluding, I think the question
 8 to ask Cordish is if not Bolton who? Who would
 9 be a surrounding community to this project?
 10 Because we think we are the most affected with
 11 the possible exception of Lancaster.
 12 The reason that we say that is that
 13 every car that comes out of Lancaster has
 14 already gone through Bolton. And while
 15 Lancaster has some issues related to proximity,
 16 Bolton has massive issues related to the
 17 traffic slowdowns. And by the time traffic
 18 gets to Lancaster, it's flowing smoothly. They
 19 have two difficult intersections in Lancaster,
 20 we have six in Bolton. And we are also every
 21 night, we are dealing with essentially a three-
 22 hour delay for a mile west of 117. And that's
 23 ignored in their materials.
 24 So, the question again is if not
 1 Bolton then who would be a surrounding
 2 community under their analysis? Thank you.
 3 CHAIRMAN CROSBY: All right. Thank
 4 you very much. The question on the table, I
 5 guess, that we will be considering probably
 6 next week is whether or not to judge Bolton as
 7 a surrounding community, right? Whether or not

8 to deem Bolton as a surrounding community. You
 9 said the question is if not Bolton, who? But
 10 that's not really the question, right?
 11 MR. DELANEY: I'm sorry, Mr.
 12 Chairman. I was being a little rhetorical.
 13 The argument that they're making is Bolton,
 14 rush-hour will only be a couple of cars or 50
 15 cars a minute -- excuse me an hour through
 16 here. So, they're not going to be

17 significantly affected. The point I was trying
 18 to make is that under that analysis no town is
 19 significantly affected by this establishment.
 20 CHAIRMAN CROSBY: So, your
 21 conclusion is that you think Bolton ought to be
 22 deemed a surrounding community?
 23 MR. DELANEY: Yes.
 24 CHAIRMAN CROSBY: Thank you.

NOVEMBER 14, 2013 – APPLICANT COMMENTS AT PUBLIC MEETING

23 But the approach we have taken in
 24 the agreements we have executed, the five that
 1 we have executed, has been as opposed to us
 2 trying to convince you that our traffic studies
 3 are correct, and the town trying to convince us
 4 that their projections are correct, the
 5 implication of the traffic, because no one
 6 thinks the traffic is going to cause a level of
 7 service impacts on the local roads, the main
 8 issue has been over the public safety costs.
 9 That if there are more accidents or more DUIs,
 10 a lot of the towns have limited public safety
 11 officials. So, they were concerned about
 12 overtime costs for police or fire.
 13 CHAIRMAN CROSBY: Excuse me, from
 14 what I've picked up, the biggest issue was
 15 actually the flow of traffic and how much that
 16 was going to affect people's lives. It also
 17 included the demand for public safety services.
 18 But I would have said, just from what I've
 19 heard that that was secondary.
 20 MR. WEINBERG: I will tell you in
 21 our discussions, the primary -- Bolton may be
 22 the only exception, but even in those
 23 discussions -- I want to take you through it
 24 because you have to have a flavor of the issues
 1 that are being discussed.
 2 The primary concern has been the
 3 cost of police and fire responding to accidents
 4 caused by there being increased traffic. I
 5 will show you in a second as we go through the
 6 local roads. The increase in traffic we're
 7 having on local roads doesn't exceed two
 8 percent, 117 is the exception. But the other
 9 local roads that go through Sterling or
 10 Fitchburg or Westminster or Princeton, there's

11 a negligible impact on the flow of traffic or
 12 the increase in traffic.
 13 So, the way we dealt with it in the
 14 five agreements that we've done was we've said
 15 that we will pay for any responses -- actual
 16 costs of any response that your fire or police
 17 have to our customers. And some, they bill us
 18 for whatever they believe legitimately is
 19 caused by additional events caused by
 customers
 20 of the casino. In other instances, we've tried
 21 to do a formula which basically looks at the
 22 number of traffic incidents on the roads --
 23 It's all public data. -- for the 12 months
 24 prior to the opening of the facility, and then
 1 the 12 months after the casino opens.
 2 And while from a practical
 3 standpoint, we would not be responsible for the
 4 causation for all of that because there has got
 5 to be something else going on in the region, we
 6 have agreed in those incidents that we would
 7 whatever it is, we'll take responsibility for
 8 any increase in accidents on the road based on
 9 that formulaic comparison.
 10 That's allowed to get out of the
 11 cycle of having to argue over is our traffic
 12 report correct or do you need to go do lots of
 13 other studies because you can spend money on
 14 lots of other studies, they're just more
 15 projections on what it's going to be. So, in
 16 those five agreements that we've done where
 17 it's a very rational look at okay, how do you
 18 make sure you can't argue with it. You look at
 19 actual data.
 20 Before we leave this, this shows a
 21 one-, three- and five-mile circumference around

22 the gaming site. As you can see, the only
23 communities that are within five miles for the
24 most part of the casino not of Leominster but
1 of the casino is Lancaster and Sterling.
2 There's a little bit of Lunenburg and a small
3 bit of Bolton. You get to the next --
4 COMMISSIONER MCHUGH: Why did you
5 pick one, three and five miles?
6 MR. WEINBERG: Just to show a range
7 of proximity, because really -- And I'm going
8 try to get into this as we go through the
9 upcoming slides, clearly as you radiate out
10 from the facility, the potential impacts
11 diminish. Our traffic does not have a lot of
12 peak flow to it. We are a 24-hour operation.
13 If anything our traffic is countercyclical to
14 the normal midweek rush-hour periods.
15 So, morning and afternoon drive
16 times are low peak periods for the casino
17 traffic. So, you really have traffic being
18 dispersed along the lots of different roads and
19 coming at a lot of different times and mainly
20 off-peak periods. Clearly, as you radiate out
21 from the facility, it's hard to argue that
22 there's lots of measurable impacts.
23 This slide just shows Fitchburg --
24 I'll get into addressing the individual
1 communities in a second. This shows the road
2 network. You'll be able to see these directly
3 from the handout I gave you, and the type of
4 traffic that we project we'll be putting on the
5 local roads. As you'll see whether it's 13
6 coming down through Townsend and Lunenburg
or
7 12 and 31, 140, 12 and 62 through Sterling, the
8 amount of traffic generated by the facility is
9 less than one percent, one, two percent. It's
10 very negligible traffic coming through the
11 local arteries. The projection that most of
12 the traffic will come down 90, 2 and then 117.
13 This next slide shows --
14 CHAIRMAN CROSBY: Excuse me one
15 second. I see it looks like one 117 says 11
16 percent. And 2 is 37 percent --
17 MR. WEINBERG: I am going to make it
18 easier for you to see that in a second. This
19 is the trip route utilization overview. In
20 looking at -- And this kind of addresses the

21 comments from the selectman from Bolton.
When
22 you look at what routes people are going to
23 use, our traffic people looked at the most
24 likely, quickest routes to the casino.
1 Most of our traffic, given what we
2 have to look at in terms of what is going to be
3 the full build-out of the gaming business in
4 Massachusetts. So, when you know there's going
5 to be a facility in the Boston area, one in the
6 south side and one to the west, a predominant
7 amount of our traffic is going to come from the
8 mid-part of the Beltway in the north, and then
9 north and south on 190. That is how we got to
10 our trip utilization. So, we show kind of
11 where we believe people are coming from and
12 what route they would take from each market.
13 I think it is also helpful in terms
14 of looking at will this facility create any
15 kind of material significant adverse impacts on
16 any of the surrounding communities. The
17 location that we are building in is a
18 commercially zoned area. It has been
19 identified both by Leominster and the
Wachusett
20 Regional Planning Commission for intense
21 commercial development.
22 So, whether it's the casino or it's
23 other types of developments, this area has
24 already been slated for development and is
1 targeted by the region. This slide compares
2 the traffic that the facility will generate in
3 terms of trip generation and this looks at
4 midweek peak hour. And it looks at a number of
5 different comparisons.
6 The first the NED mixed use
7 development. There had originally been several
8 years ago a regional mall planned for this
9 location. So, this identifies what that would
10 have generated in terms of peak traffic. There
11 is an existing Walmart across the street from
12 the proposed gaming site. And their peak
13 traffic is about double what the gaming
14 facility is projected to have.
15 We've also provided comparisons to a
16 typical strip shopping center, 160,000 square
17 feet, a supermarket and Lowe's which is also in
18 the area of the casino. So, when you compare

19 it to other commercial uses that are targeted
20 for this area, the gaming facility does not
21 generate excessive peak traffic.
22 This is probably easier to look at
23 in terms of this looks at the trip distribution
24 on the local roads. So, what percentage of the
1 site trips are coming through each community
2 and each of the local roads. You can see with
3 the exception of Lancaster and Bolton that all
4 of the other communities have less than two
5 percent of the trips coming through their
6 communities.
7 You can also see why we took the
8 approach of trying to just treat everybody in a
9 similar framework. Because really the traffic
10 that is coming through the local roads are give
11 or take relatively the same through each of
12 these communities.
13 CHAIRMAN CROSBY: Well, not quite.
14 MR. WEINBERG: What's that? With
15 the exception of Lancaster and Bolton, right.
16 And in those instances, we're looking at about
17 11 percent of the local trips coming through
18 those communities.
19 And this looks at the daily increase
20 in traffic versus current condition through
21 each of these communities. Similar to the
22 prior slide, it shows you that the increases
23 are also in the two percent range with the
24 exception of Lancaster you'll see about an
1 eight percent increase in traffic on 117. And
2 Bolton will see an increase of about four
3 percent.
4 The reason why the increase in
5 Bolton is less than Lancaster is that this is
6 an increase in traffic. So, they have a much
7 higher volume of traffic today coming through
8 Bolton than Lancaster. So, the additional --
9 actually if you go to the next slide, Jeff.
10 COMMISSIONER MCHUGH: This is the
11 percentage over the existing.
12 MR. WEINBERG: Right. So, you have
13 compare to what is the existing state and what
14 is the impact of the incremental traffic that
15 we're adding to the roads.
16 The other thing that needs to be
17 kept in mind is that for instance through the
18 MEPA process, one of the things we're looking

19 at is the intersection -- This was required
20 under our ENF scoping -- was looking at the
21 intersection of 495 and 117. So, issues of
22 traffic improvements that are required under
23 MEPA if there are any, that will be something
24 that will be looked at as part of our
1 environmental impact review that's something
we
2 are responsible for outside of the surrounding
3 community agreements.
4 So, if there are traffic
5 improvements that are needed to be made under
6 the MEPA process, we're required to make that.
7 So, that is not an issue in terms of the road
8 improvements under the MEPA process under
the
9 surrounding community agreement.
10 Moving on from traffic for a moment.
11 Some of the other items that have been outlined
12 in some of the petitions by the communities for
13 surrounding community designation have
implied
14 that somehow we will put some stress on the
15 infrastructure of these towns. And that is
16 simply not true. All of our utility
17 infrastructure, water, sewer is being provided
18 by the city of Leominster. We will be
19 improving the drainage in the area.
20 Right now the area that we are at
21 actually has a lack of storm water and drainage
22 controls. So, we are going to be putting in
23 state-of-the-art systems and really improving
24 the drainage issues in the area. Electricity
1 and gas are coming from the National Grid
2 provider. And there is plenty of capacity.
3 There had been a statement in the
4 Sterling petition that we were somehow
5 impacting their aquifer. We provided a letter
6 from the Department of Public Works from the
7 city of Leominster stating that this area is
8 being served today solely from the capacity of
9 the city of Leominster. It is not impacting
10 the aquifers of Sterling.
11 From a traffic standpoint,
12 construction traffic we will mandate that our
13 construction activities happen on the major
14 roads unless of course the contractor is
15 located in one of these local communities,

16 which is one of the things that we are trying
 17 to do which is to hire as many local people as
 18 possible.
 19 Obviously, noise from construction.
 20 We are in a commercial industrial area. So,
 21 there is no overflow or impact from
 22 construction noise to any of these communities.
 23 From a traffic standpoint, there is
 24 no road, including 117, where we are
 1 diminishing the level of service of the road.
 2 190 which is our major artery that we are off
 3 of its way underutilized at this point. It's
 4 only using about 30 percent of its capacity.
 5 So, we have that infrastructure available to
 6 us.
 7 From a public safety standpoint, we
 8 are building a police substation as part of the
 9 facility for the Leominster Police. That is in
 10 addition to the state police and Mass. Gaming
 11 presence.
 12 CHAIRMAN CROSBY: I was going to ask
 13 about clarification. I've heard concerns. So,
 14 what you are committed to is that you will
 15 build enough to provide a substation in
 16 addition to that space which is required for
 17 the Massachusetts State Police in the Gaming
 18 Commission?
 19 MR. WEINBERG: Absolutely. If
 20 anything, we undersold the amount of existing
 21 regulatory and state and local presence. But
 22 to clarify, absolutely we will have both what
 23 we are required to do under the statute for the
 24 Gaming Commission, the State Police as well
 as
 1 a new substation for the city of Leominster
 2 Police force. And that is a written obligation
 3 under our host agreement.
 4 And then another item that is
 5 included in some of the petitions is a concern
 6 over social aspects regarding problem gaming.
 7 As you all know, the facilities will be paying
 8 a lot of money and a big portion of the tax
 9 goes towards addressing problem gaming issues.
 10 In fact, the state will be spending a
 11 disproportionate percentage of what's being
 12 spent in the entire nation.
 13 So, if anything we believe that
 14 there will be more resources available for

15 addressing these social issues that exist
 16 today. Of course, we are surrounded by states
 17 and gaming facilities. So, we just believe
 18 that given the size of our facility that if
 19 anything, collectively between the facility
 20 operators and the state, we will be bringing
 21 more resources to this issue.
 22 In fact, the state has 12 state-
 23 funded programs to address problem gaming.
 One
 24 of those is located in the city of Fitchburg.
 1 So, the state is already funding those programs
 2 in the region.
 3 COMMISSIONER MCHUGH: Before we
 4 leave this slide, what do you mean by the first
 5 no level of service increase on any local or
 6 state roads?
 7 MR. WEINBERG: Roads are given
 8 letter designations, A, B, C, D and F -- It
 9 skips E -- which indicates at what level of
 10 operation it is at. A being the best level of
 11 operation. F obviously being failing. So,
 12 typically you need to move from one letter
 13 designation down in level of service, I think,
 14 the typical rule of thumb is 10 percent
 15 increase in the traffic. And not only that but
 16 that causes it to then not operate properly.
 17 But typically 10 percent is the threshold. So,
 18 there is no road that we are impacting to that
 19 degree that we are changing how the state
 would
 20 designate the level of service on those roads.
 21 COMMISSIONER MCHUGH: You have an 11
 22 percent increase on 117.
 23 MR. WEINBERG: It's not an 11
 24 percent increase on 117. It's 11 --
 1 CHAIRMAN CROSBY: Eight percent.
 2 MR. WEINBERG: That was 11 percent
 3 of the trips.
 4 COMMISSIONER MCHUGH: 11 percent of
 5 the trips.
 6 CHAIRMAN CROSBY: The generated
 7 trips, which nets to an eight percent increase
 8 over its present volume.
 9 COMMISSIONER MCHUGH: That's right.
 10 That's right.
 11 MR. WEINBERG: Eight percent in
 12 Lancaster and four percent in Bolton.

13 COMMISSIONER MCHUGH: So, I guess
14 I'm thinking -- I hear you. But I'm thinking
15 you add a drop of water to a full cup and it
16 overflows. That's not an exact analogy. But
17 the impact on an already overstressed road may
18 only be a slight increase. But that slight
19 increase may have a detrimental --
20 MR. WEINBERG: And that's why we
21 look at the peak traffic numbers. For
22 instance, in the Bolton, Lancaster area, we
23 project about 54 trips per hour during the peak
24 5:00 to 6:00. So, during the peak rush-hour
1 traffic, we project about 54 trips going
2 through that area.

3 Again, our traffic is typically
4 countercyclical to those rush-hour traffic.
5 So, we're talking about adding less than one
6 car a minute to the traffic. So, during those
7 stress periods, it really is not a terribly
8 significant increase in the traffic on the
9 road.
10 COMMISSIONER MCHUGH: I hear you.

3. DEVELOPMENT

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

The Town of Bolton argues that it is inevitable that a significant portion of the construction vehicles will use the short cut from 495 through Bolton.

The Applicant states that it “will direct its construction team to avoid local roads and to utilize the major highways for all construction traffic.” Furthermore, it states that the “Town cannot demonstrate that any noise or environmental issues, if any, caused by the Project will have a significant or adverse impact on the Town.

Green International found that “[t]he Applicant has stated that construction related heavy vehicle traffic would be controlled and remain on the area’s major roadways. With I-190 adjacent to the site, this would be expected to provide the major route of access for transporting materials to the site, particularly long haul trips. However, there is the potential for I-495 use and with that, the potential for Route 117 to be used by “non-local” construction traffic. While it is fairly early in the process to know definitively the sources of materials, construction traffic and the source of materials, would be controlled to a large degree by the Applicant. **This would be important with respect to minimize the potential use of Route 117 by this type of traffic.** “

A. COMMUNITY PETITION

Construction of the Proposed Facility Will Significantly and Adversely Affect Bolton

The Applicant has not quantified the volume or direction of truck traffic that will accompany construction of the proposed facility. As Police Chief Alfano notes, however, Bolton is already a "short cut" used by heavy commercial vehicles. See Exhibit K. Given the direct route Bolton provides from Route 495 to the site, it is inevitable that a significant portion of the construction vehicles needed to build the large facility proposed by the Applicant will come through Bolton.

B. APPLICANT RESPONSE

THE TOWN WILL NOT BE SIGNIFICANTLY AND ADVERSELY AFFECTED BY THE DEVELOPMENT OF THE PROJECT

Construction of the Project will take approximately 12 months to complete. It is anticipated that during the peak of construction, approximately 600 construction workers will be working on the Project site at any given time. For the reasons stated above, the trips generated by the Project during its construction will not have a significant or adverse impact on the Town.

All construction of the Project will occur on site. The Town cannot demonstrate that any noise or environmental issues, if any, caused by the Project will have a significant or adverse impact on the Town. Moreover, PPE will direct its construction team to avoid local roads and to utilize the major highways for all construction traffic.

C. RPA ANALYSIS

None

D. ENF ANALYSIS

The DEIR should include a discussion of construction phasing, evaluate potential impacts associated with construction activities (including but not limited to noise, vibration, dust, and traffic flow disruptions) and propose feasible measures to avoid or eliminate these impacts. The phasing plan should identify whether office and industrial operations will continue in the northern area of the site during construction and, if so, how parking and other needs will be accommodated during construction.

E. CONSULTANT ANALYSIS

None

F. APPLICATION

2-30

PPE believes the construction of Massachusetts Live! Casino will be completed within 12 months from receipt of all construction permits. The potential timeline is: January 1, 2014 – Gaming Commission issues Category 2 license July 1, 2014 – all construction permitting is completed and construction commences July 1, 2015 – Massachusetts Live! Opens The Project anticipates completion and opening in one phase. The Project is sited directly off I-190 and Route 117 in an existing commercial industrial area. A portion of the site is an existing gravel pit operation and adjacent neighbors include two plastics manufacturers, Wal-Mart and Lowes Home Improvement. The closest residential neighborhood, Liberty Commons, and PPE have entered into a Letter of Agreement which outlines among other items, a means for PPE and the Homeowners Association to communicate and address issues such as traffic, trash and security.

3-4

Leominster is a Gateway City, designated by the Commonwealth in recognition that the community has historically lagged state averages in educational performance and job growth. The Commonwealth has targeted Gateway cities for special assistance in obtaining business and economic development, with special emphasis on job creation. Massachusetts Live! will create over 1,200 direct jobs, approximately 600 during construction and 600 + during operations. The Company has entered into a Host City Agreement with Leominster which provides for job preference for qualified Leominster residents in construction and operations. The Company intends to also provide a preference in hiring from citizens of neighboring towns and cities in the North Central region. PPE has entered into MOUs with MCCCCTI and Fitchburg State University to provide workforce development and training, and with ARC of Opportunity to help identify disabled members of the community and to help train these citizens for work on the Project.

4-54

Tutor Perini Building Corp. is a leader in the field of sustainable construction. The Company has been committed to the green building movement since 1996, when they completed their first environmentally friendly project, the Shaklee World Headquarters. Since then, they have constructed many of the largest sustainable buildings in the Country, including CityCenter in Las Vegas, NV, which is currently one of the world's largest environmentally sustainable developments and includes six LEED® Gold Certified projects. Some of the sustainable strategies that may be implemented into the proposed Project to support LEED™ Certification are outlined below.

- Construction Activity Pollution Prevention
- Reduction of “Heat Island Effect”
- Record Keeping

- Construction Waste Management
- Regional Materials

5-33

The roadway system serving the Project site has sufficient capacity to accommodate the anticipated 8,130 daily vehicle trips expected to be generated by the proposed development. Route 117 was recently widened and traffic signals were installed to serve expected traffic demands associated with a large retail development located immediately north of the proposed slots facility site. That improvement anticipated background traffic growth, as well. Those significant traffic growth expectations were never realized and the roadway system now has more than adequate capacity to serve the needs of the proposed facility. Notwithstanding these findings, PPE will improve signage on Route 117 and install a new traffic signal on Jungle Road to better control site access. Jungle Road will also be widened from its existing two-lane cross section to create a boulevard and adding sidewalks and bike lanes to safely accommodate all travel modes. An extension of the existing bus route serving the site is proposed, as well as shuttle bus connections to downtown Leominster and Leominster's commuter rail station. A construction management plan will be developed with state and local officials: to minimize construction traffic generation during peak traffic hours; to limit truck traffic to approved, designated routes; and, to ensure that construction workers park only on the site and/or in designated remote parking facilities

5-37

The B&S Consulting Impact Assessment prepared for the City of Leominster states, "an increased demand on school services, or new teachers is not to be expected to result from the employee pool as those with children are likely to be in large part already in the community." The consultant's statement is based on their conclusion, with which we concur, the vast majority of Massachusetts Live! employees will be filled by people already living in Leominster or the surrounding North Central areas. The proposed casino location is in a commercial/industrial zoned area of the City of Leominster. There are no schools, churches playing fields or parks within one mile of the proposed casino.

4. OPERATION

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

The Town of Bolton argues that increased traffic volumes and the fact that the facility serves alcohol will increase the number of accidents and arrests or related mutual aid calls.

The Applicant includes letters from the Leominster police and fire departments stating that they do not expect any mutual aid from Bolton. Further, the Applicant notes the addition of a Leominster police station at the facility, in addition to State Police and Gaming Commission personnel. Finally, the Applicant notes that based on a review of crash data along 117, projected traffic would result in less than 3 incidents per year.

A. COMMUNITY PETITION

As detailed below, the Town of Bolton will be significantly and adversely affected by the Proposal. Route 117 through Bolton provides ready access to Leominster from Route 495 and the large volume of traffic and accompanying public safety issues that the Town currently experiences will be exacerbated by the Proposal.

The Proposal's Impact on Public Safety Will Significantly and Adversely Affect Bolton

Attached as Exhibit K is a memorandum from Bolton's Police Chief Vincent C. Alfano detailing the impact the Applicant's facility will have on Bolton's police operations and resources. As Chief Alfano explains, the Bolton Police Department is already stretched thin as a result of the volume of traffic on Route 117, which causes a call volume and activity level of a town with four times Bolton's population. The Proposal will exacerbate these issues:

Though the proposed Slot Parlor will be physically located on the Leominster/Lancaster line, I feel Routes 117, 495, and 85 through Bolton will be major feeder roadways for persons, commercial, and bus traffic to this location. Since the proposed hours of operation will be 24 hours a day, seven days a week, this impact will be felt in Town round the clock. We already experience significant call volume and traffic increase during the fall "tourist" season. Also, I anticipate a significant increase in our calls for "back-up" or mutual aid from our neighbor, the Lancaster Police Department. We are currently a primary responder to them for call for assistance of all types. As the proposed Slot Parlor will serve alcohol, we will experience an increase in the number and frequency of alcohol impaired operators passing through our community, and the associated risks to safety, particularly due to accidents and arrests.

In conclusion, the location and operation of a significant traffic draw such as a Slot Parlor, along the Route 117 corridor near Bolton will have major impact on our Police operations and resources, as well as directly affect the quality of life of our residents, and those that pass through our borders.

Exhibit K.

B. APPLICANT RESPONSE

THE TOWN WILL NOT BE SIGNIFICANTLY AND ADVERSELY AFFECTED BY THE OPERATION OF THE PROJECT AFTER ITS OPENING

The Town cannot demonstrate that it will be significantly and adversely affected by the operation of the Project.

In its Petition, the Town asserts that the Project will impact public safety. The only evidence of this impact is a statement from the Town's police chief who asserts that higher traffic volumes and the fact that the Project serves alcohol will increase the number of accidents and arrests or related mutual aid calls from Lancaster. The chief provides no evidence to support his conclusions.

Leominster public safety officials have confirmed that Leominster police, fire and EMT services will be able to address any incidents at the Project and do not expect any "mutual aid" assistance from the City [see attached letters from the Leominster Police and Fire Departments], thus disproving the Town's assertions in its Petition. In addition, PPE has agreed in its Host Community Agreement with Leominster to build a police substation at the Project for the Leominster police department, which will enhance public safety in the area. This is in addition to the space provided in the Project to the Massachusetts Gaming Commission staff and State Police.

Additionally, in reviewing current crash data along Route 117 and applying it to the proposed increase in traffic from the Project, Project traffic would result in less than 3 additional incidents per year, hardly a significant and adverse impact.

Leominster Fire Department

I am aware that the proposed slots parlor to be constructed in Leominster consists of a 100,000 square foot building containing 1,250 slot machines and 4 restaurants. This proposed building will be equipped with both a fire sprinkler and fire alarm system.

It is the anticipation of the Leominster Fire Department that this structure will not generate a large volume of fire calls and we anticipate handling them with our on duty resources. I do not expect an increase in mutual aid for fire calls at this location.

The Leominster Fire Department is the ambulance provider for the city, and is currently trying to staff a second ambulance due to call volume. Calls for emergency medical assistance have increased in recent years and I do expect the slots parlor to add to this. It is my feeling and anticipation that revenue received from the host agreement will be used to increase our

ambulance coverage. If that is correct, I do not anticipate an increase in mutual aid for medical calls.

Leominster Police Department

The Leominster Police Department has entered into and held a mutual aid agreement via M.G.L. Chapter 40 section 80 for many years. Primarily this agreement is used for inter jurisdictional investigations involving undercover drug investigations with the City of Fitchburg and other surrounding city and towns.

Notwithstanding the mutual aid agreement, over my 35 years as a Leominster Police Officer, the primary agency we have relied upon for additional resources, has been the Massachusetts State Police. There are far and few times we have had the need to call upon another surrounding community, including the City of Fitchburg to assist us with resources that the Leominster Police Department did not already have at our immediate disposal.

The Leominster Police Department has consistently responded to all emergencies and calls for service in a timely efficient manner. We pride ourselves on having a professional and dedicated department capable of responding 24 hours a day with sufficient resources and manpower.

C. RPA ANALYSIS

Relevant to housing impacts, as indicated above, the document does not clearly indicate the anticipated number of employees, local hires or incoming households. The effects of the housing downturn have been especially persistent, sustained and penetrating in the Montachusett region . Mass Housing Partnership and the Warren Group report there are more than 1,000 foreclosed properties in the region . There are 356 foreclosed homes in Fitchburg and 201 foreclosed homes in Leominster. These units are removed from the market and unavailable as housing for long periods of time. Foreclosed properties are only gradually being returned to the market. Former owners who stay in the area frequently find housing by doubling up with friends or family and there is anecdotal evidence that some household members are splitting up to obtain housing . There is also some anecdotal evidence that developers are beginning to test the waters for returning to the housing market for new construction (surveyors are in the field, more land for sale signs appearing, etc.) but not for existing foreclosed or distressed properties. Should development take place the proponent, the host community and the "surrounding communities" should use this new job generating facility as an opportunity to connect employees with available homes reversing recent disinvestment and stimulating reinvestment in neighborhoods throughout the Montachusett Region thus stabilizing neighborhoods.

D. ENF ANALYSIS

The project will increase water demand by 26,627 GPD for a total of 28,513 GPD. The site is served by the City of Leominster municipal water system. There is an existing water main located in Jungle Road along the site frontage. Comments from MassDEP indicate that the DEIR should include revised water usage projections. The DEIR should detail the method and provide supporting data to demonstrate how these calculations were developed. MassDEP states that if the DEIR provides sufficient data to confirm the estimated water usage presented in the ENF the City of Leominster has adequate capacity for this water supply.

The ENF indicates that the existing infrastructure has adequate capacity to supply the project. New sewer mains were installed in Jungle Road and New Lancaster Road in 2007 as part of a large scale commercial development near the project site. The new sewer mains flow by gravity to a pump station located at the end of Lancaster Street that discharges to a force main that runs along Lancaster Road and finally~ by gravity flow, to the City of Leominster Wastewater Treatment Facility. The project proposes to extend the 12-inch sewer along Jungle Road approximately 1,500 linear feet to the project site.

E. CONSULTANT ANALYSIS

None.

F. APPLICATION

3-1

The Project will provide significant benefits to both the Commonwealth and Local economies. PPE will create 1,207 direct jobs and over 600 indirect and induced spin-off construction jobs. During construction, the Project will create \$212 million in total economic output. After opening, the Project will employ 600+ direct full-time equivalent employees and create 352 indirect induced jobs and generate approximately \$1.1 billion in taxes and fees to the Commonwealth and Local governments during its first ten (10) years. PPE expects to have a positive impact on local cultural institutions and small businesses in the region. PPE has entered into a Memorandum of Understanding with Fitchburg State University to support the University's cultural activities through joint marketing efforts. PPE projects 2.4 million visitors to the casino in its first year, 75% of which are originating from outside the host and surrounding North Central community areas. These casino visitors are excellent new prospects for enjoying the cultural and attractions offerings in the region. In addition, these new visitors to the region are expected to provide local restaurants, hotels, retail stores and attractions with new sources of business. In addition, PPE has entered into an agreement with the University of Massachusetts system to fund one million dollars per year into a program – M3D3 – which will provide seed grant monies to Massachusetts-based technology start-up companies utilizing plastics and related materials to develop medical devices. This program is expected to fund approximately ten (10) companies each year and be the catalyst for creating thousands of new, hi-tech jobs and millions of dollars of new tax revenue for the Commonwealth, while supporting the region's brand as an "Innovations and Hi-Tech" corridor.

3-2

PPE anticipates that it will create 600+ full-time equivalent jobs with benefits. Pay rates will vary based upon position, but benefits will be consistently applied and all will include health and retirement benefits. Jobs will be available in all areas, including finance, accounting, marketing, information technologies, human resources, food and beverage, facilities, security, surveillance and gaming operations. PPE will employ extensive outreach efforts to maximize employment in the local region, including ensuring diversification of its employee base. Competitive wages will be offered in order to attract and retain a qualified workforce based on a regional wage study PPE will conduct after selection by the Massachusetts Gaming Commission.

3-4

Leominster is a Gateway City, designated by the Commonwealth in recognition that the community has historically lagged state averages in educational performance and job growth. The Commonwealth has targeted Gateway cities for special assistance in obtaining business and economic development, with special emphasis on job creation. Massachusetts Live! will create over 1,200 direct jobs, approximately 600 during construction and 600 + during operations. The Company has entered into a Host City Agreement with Leominster which provides for job

preference for qualified Leominster residents in construction and operations. The Company intends to also provide a preference in hiring from citizens of neighboring towns and cities in the North Central region. PPE has entered into MOUs with MCCCCTI and Fitchburg State University to provide workforce development and training, and with ARC of Opportunity to help identify disabled members of the community and to help train these citizens for work on the Project.

3-21

PPE will generate incremental revenues to businesses in the region through a number of opportunities. First, in the expected case, spending at the casino with a variety of vendors providing goods and services accounts for \$15.4 - \$18.3 million. Employees working at the facility and living in the region are expected to spend approximately 30% of projected salaries of \$6.0 - \$6.6 million for goods and services. Other contributors include visitors from outside the area that will spend money in the region, which accounts for an additional \$3.5 - \$4.5 million. Revenue for regional businesses is expected to grow \$25.0 - \$29.4 million as a result of casino activity. Figures are represented in the following table for expected worst and best case scenarios.

4-2

The City of Leominster has a rich architectural and cultural history with primary focus in the downtown area and neighborhoods. One of the particularly advantageous points of our project site is that the Project is located a significant distance from downtown, from the majority of residential neighborhoods, and is located within an industrial zone adjacent to pre-engineered metal structures, a stone quarry, and adjacent to Interstate 190. To access the project site from Interstate 190 and the downtown of Leominster, the intersection at New Lancaster Road and Jungle Road will be improved and enhanced access to the retail and commercial center located at this intersection.

4-35

The City of Leominster lies entirely within the Nashua River basin. It encompasses about 30 square miles of land. Much of the western half of the city includes state forest, watershed lands, and other protected open space. The City obtains its drinking water from the Distributing Reservoir system, including Haynes and Morse Reservoirs; the Fallbrook Reservoir at Wachusett Street; the Notown Reservoir system, including Goodfellow Pond and Simonds Reservoir; and the Southeast Corner Well Fields at Jungle Road. Leominster also has an emergency connection to the Wachusett Reservoir at Rte 110. PPE representatives met with the City of Leominster, Department of Public Works Assistant Director and the Business Manager, to review proposed utility connections to the Project. They confirmed that there is adequate flow and pressure in the existing system to serve the Project, without any adverse effects on the system. Taken from the City of Leominster 2012 Drinking Water Quality Report.

4-36

The City of Leominster operates a Waste Water Treatment Facility located at the intersection of Commercial Road and Mechanic Street. The Facility has a design capacity of 9.3 million-gallons-per- day (MGD) and the average daily flow varies between 5.7 and 5.8 MGD. The facility has the capacity to treat an additional 3.5 MGD of wastewater. The City owns and maintains a network of gravity sewers, pump stations and force mains that convey the wastewater to the plant for treatment. The average daily flow for the Project will be 54,400 GPD (0.054 MGD) of sewerage, far less than the available capacity of the Treatment Plant.

4-65

PPE takes seriously its responsibility to ensure minors are excluded from the gaming premises. All public access points to the facility will be controlled by the Security Department to prevent access to underage individuals to the facility. In addition to Security control of public access points, PPE will employ a series of additional measures to combat underage gaming, including working with any enforcement or remedial standards established by the Massachusetts Gaming Commission.

5-06 Host Agreement Mitigation

5-23

PPE Casino Resorts Massachusetts is committed to providing the highest standard of customer care and a responsible gaming venue. The PPE Casino Resorts Massachusetts, LLC Responsible Gambling Plan will provide the framework through which the facility ensures its practices are consistent with the community's expectations and that our operation will be conducted in a responsible manner. PPE Casino Resorts LLC will prominently post on signage throughout the facility, on every slot machine, all video monitors and all advertisements, a gambling assistance message to include a toll free telephone number and website address which a patron may wish to utilize if they believe they have a gambling or substance abuse problem. Additionally, PPE Casino Resorts makes available to its patrons brochures which help explain problem gambling issues to its patrons and Team Members. These brochures also provide information on places that can provide assistance in problem gambling related issues. Attached to this response is a Responsible Gambling Plan which governs the responsible gaming policies of another PPE Casino Resorts facility which would serve as a model for the Massachusetts facility. Any PPE Responsible Gambling Plan would be consistent with all regulations promulgated by the Massachusetts Gaming Commission.

5-26

PPE will train its team members on Responsible Gaming and Responsible Alcohol Service at a Team Member's initial orientation. At this initial training, each Team Member will be trained in all aspects of the PPE Responsible Gambling Plan. Additionally, each employee will receive annual refresher training on these same topics. By educating our Team Members through training, we will enhance their understanding of the impact of problem gambling. Attached to this response is a Responsible Gambling Plan, which governs the responsible gaming policies of

The Company's Maryland Live! Casino, which would serve as a model for the Massachusetts facility. Additionally, attached to this response is an example of the Problem Gambling Training material which will be offered by PPE. Any PPE Responsible Gambling Plan would be consistent with all regulations promulgated by the Massachusetts Gaming Commission.

5-31

PPE is committed to providing the highest standard of customer care and a responsible gaming venue. The PPE Responsible Gambling Plan will provide the framework through which the facility ensures its practices are consistent with the community's expectations and that our operation will be conducted in a responsible manner. An element of such a Plan is information on locations that can provide assistance to individuals seeking treatment. PPE will prominently post on signage throughout the facility, on every slot machine, and all video monitors, and in all advertisements, a gambling assistance message to include a toll free telephone number and website address, which a patron may wish to utilize if they believe they have a gambling or substance abuse problem. Additionally, PPE will make available to its patrons brochures which help explain problem gambling issues to its patrons and Team Members. These brochures also provide information on locations that can provide assistance in problem gambling related issues. The Company's Maryland Live! Casino participates in organizations, such as the Maryland Alliance for Responsible Gaming, which analyzes Problem Gambling issues along with members of regulatory agencies, the legislature, academia and the Department of Health and Mental Hygiene to develop programs and measures to combat problem gambling. PPE will follow this example. PPE will be an active participant in public and private partnerships which seek to address the issues of problem gambling in the state of Massachusetts and to develop treatment and prevention programs/solutions.

5-38

PPE has already established a good working relationship with local police, fire and Emergency Management Services. The local firehouse and emergency medical first responders are sufficiently staffed and equipped. The firehouse is located less than one mile from the proposed facility which assures a rapid response in case of an emergency. The local police department deploys between five and twelve officers per shift and anticipates a response time of between three to five minutes for calls for service. A police substation will be located within the proposed facility. This staffing level and response time is a more than adequate to meet the needs of the proposed facility. In addition to the availability of the aforementioned emergency services, PPE will maintain a staff of security officers trained in Cardiopulmonary Respiration (CPR), the use of automated external defibrillators (AED) and basic first aid.

G. OTHER

B&S CONSULTING REPORT

According to the National Center for Responsible Gambling, 1% or less of the population is affected by problem gambling. An important mitigation technique is on site counseling and training of employees to identify those with repetitive behavior and liable to get into gambling trouble.

- a. Local street crime has not increased due to gaming activity. Some early studies of the incidence of street crime blurred the difference of incidents in nearby areas and those larcenies or assaults that occur on the casino campus. When that distinction was made, the off-site incidence was found to be at historic low levels in Ledyard & Norwich Ct.
- b. Gaming has a high employee turnover rate and at Foxwoods about 3000 on average or 10% - 20% of the labor force per year, But for a new site like the ‘Live’ Slot Casino with limited competition turnover should be less.
- c. Spin off business serving the “drive” or primary market has been limited, minimal growth of local business on access routes has been observed.
- d. Gaming monopolies are ending as Gaming is trending to be a ubiquitous activity: slots in bars to on line gaming.
- e. The MGC through its license agreements will enforce the mitigation agreements through its licensing and revenue requirements.
- f. Gambling has been associated with certain poor health conditions. Future studies by the Gaming Commission will shed light on the relationship between health, age of player, and the casino environment.
- g. Mental Health conditions associated with problem gambling have required increased funding and the Mass Gaming act requires a portion of the revenue be set aside for study and treatment of those conditions. In addition each licensee will be required to participate and fund local problem gaming outreach and education efforts.

Predictable Demands on Public Services

- a. Funding for public improvements has been often limited, but the Mass Gaming Act and the Host Community Agreement that is in place between the City of Leominster and PPE/Cordish provides for complete funding for infrastructure and public service demands that are to be identified during the permitting process by the Planning Board. PPE is liable for all construction, design and permitting/inspection costs.
- b. Water and sewer: In discussions with city technical staff we have been advised that Woodward and Curran are the City’s engineering consultants who are and will be working with the developers (PPE/Cordish) to provide infrastructure services to the proposed facility on Jungle Road and elsewhere. Our own inspections reveal existing sewer and water services exist in Jungle Road and have been advised by the Public Works staff that sufficient capacity exists in Jungle Road that had been installed for Wal-Mart and other business in that area. That area is zoned MU1 (manufacturing) and has

been actively marketed by the City for new development. Our own flow analysis, prepared for Raynham indicates for the 1250 slots and 800+ restaurant seats we would expect the facility to generate about 25000 gals per day of water and sewer demand. Public Works advises B&S, 28,000 gals per day are set aside for this project.

- c. Highways. The project site on Jungle Road is served by an intersection fully developed with timed signalization and a double left hand turn. Clearly this was designed with further development beyond the present Wal-Mart et al, in mind. Again we are advised that “Woodward & Curran” will be working with traffic engineers to review any timing adjustments that maybe required for the existing signals or their timing. With the expected level of traffic for the facility, B&S does not anticipate major expenditures being required for this intersection. However a fully developed intersection at the driveway of the Casino and Jungle Road and widening of Jungle Road to a standard section (42’ wide is recommended) Our work at Foxwoods, Mohegan Sun, Raynham and Twin Rivers have provided us with the following factors to estimate traffic generation on a daily basis and for the peak hour. We have found that by comparing the varying number of gaming positions at those facilities to traffic counts about 4 to 5 daily trips (Foxwoods/Mohegan) occur per gaming position. Applying that ratio to the 1250 slot machines results in about 5620 expected daily trips at Jungle Road. For Peak Hour Traffic between 5pm – 6pm we expect about 0.3 - 0.4 Trips per slot machine, or about 500 ins and outs in that hour. In comparison consider the following trip factors for the average Wal-Mart and Lowes.

Wal-Mart

Sat: 1,120 Trips

Week day: 870 Trips

Lowes

Sat: 590 Trips

Week day: 310Trips

Besides the intersection of Lancaster Street and Jungle Road several streets have been identified as requiring study and possible upgrade as a part of the Host Community Agreement. Traffic analysis underway by Woodward and Curran, consultants for the Planning Board of Leominster, include: Old Mill Road & Beth Avenue, Central Street and Grant Street near Sunrise Assisted Living. Also Litchfield Street & Central Street, Lancaster at Viscoloid Avenue and Howard Streets, Lancaster Street at Johnson Street, and Willard Street at Jungle Road and between Central Street & Lancaster Street. These studies are underway and will be overseen by the Planning Board. Thus it is our opinion while many Leominster residents will visit the facility, the majority of patrons will come from that 30 to 60 mile primary market circle, mainly arriving from I-190 onto Route 117 and turning left onto Jungle Road.

- d. Police and Fire

i. The Host Community agreement provides for a 430 sq. ft. police substation within the facility. While additional police officers for the force are not part of the agreement, the Police Chief will determine the level of shift staffing that will be assigned and paid for by the PPE management. Specific information as to the relationships between State Troopers and Gaming Commission enforcement personnel has not been finalized between them. That inter- jurisdictional relationship will set the parameters for requirements for local police staffing.

ii. CRIME: Off property street crime has not appreciable increased due to gaming activity as reported in Police reports by Connecticut State police. The Foxwoods Casino opened in Ledyard in 1992; Mohegan Sun opened in Montville in 1996. Uniform Crime Reports (UCR) data show that since the casinos opened, index (serious) crimes have increased overall in Ledyard, Montville, Norwich, North Stonington, and Preston combined. Index crimes are murder, rape, robbery, aggravated assault, burglary, larceny, and motor vehicle theft (MVT). The increase in these crimes occurred primarily on casino premises. General studies of the incidence of street crime blurred the difference of incidents in nearby areas and those larcenies or assaults that occur on the casino campus. When that distinction was made, the off-site incidence was found to be at historic low levels (Ledyard)

The proposed on site police substation is highly recommended to mitigate against the incidence that may occur even at the smaller sized slot casino. Please note that the older ages of the majority of slot players, as opposed to younger players for full casinos, mitigate against the level of activity seen in Ledyard at Foxwoods. In 2000 there were about 6100 gaming positions at Foxwoods and about 565 incidents of larceny on the casino premises during the year or about a .09 ratio. That rate includes attempts to cheat at the tables or machines or not paying for a tab. At a smaller facility that ratio will be less. If one were to assume a similar ratio, for “Live! Casino” at 1250 slots or positions at years end 112 larcenies would have occurred or about 2 per week. However, in the similar facilities, such as in the Maryland Live! Facility, visited by the Police Chief, with an onsite police presence, area crime incidents reduced 25%.
▶ Thus B&S concludes what will be observed at the “Live! Casino” will be a fraction of the .09 rate, or a decrease in the area due to continuous Police presence. The Leominster Police Department was very open in supplying crime event data for the last 2 years and for the last 6 years. Mapping provided indicate areas of concentrated incidents occur downtown and at the Whitney Field Mall area. The new Wal-Mart has experienced an uptake in larcenies and this is very similar to the experience of Raynham with their new Wal-Mart.

▶ Also B&S notes that there will be an increased demand for emergency response calls to the area due to the poorer health of the older patrons of the facility. It is recommended that during peak hours an ambulance unit be placed on standby at or near the casino.

e. Schools: As discussed below, it is not expected that the “Live! Casino” will need to import large numbers of employees if any. And if so those will be managers who have gained experience in working at other gaming or entertainment venues and will have

higher than average wage levels. Thus an increased demand on school services, or new teachers is not to be expected to result from the employee pool as those with children are likely to be in large part already in the community.

- f. Housing: Leominster has over 17,000 housing units of various types. Of that vacancy rates for Leominster for owner occupied and rental housing have hovered near 3% in general terms for a decade or about 500 units of housing. Also Leominster is a community of about 41,000 people of all ages, with about 20,200 in the work force, and in July of 2013, 1990 were unemployed or about 9.9%. The number of jobs at the “Live Casino” estimated by PPE/Cordish will be between 500 and 700, and they specify elsewhere that there will be 605 FTE’s. With unemployment at 1990 individuals in July 2013, the level of new jobs could be filled by folks in Leominster right now. Let’s assume, however, only 1/2 to 2/3 will be from the unemployed pool in Leominster. Whatever the actual number, it will create housing demand for a significant proportion of the vacant housing stock, of about 500 homes. When interviewing the Director of Housing Mr. Capoccia, he indicated Cordish committed to workshops with the HA to provide the HA clients with employment opportunities. As HA rents are limited to 30% of income this will help low income wage earners to keep or find housing as their rent will be tied to income, benefiting not only the Leominster Housing Authority and its clients. Job fairs will be held at locations such as the Allencrest Apartments on Viscoloid Avenue near the site. The HA currently has 1800 housing units in its inventory.
- g. Employment: Cordish executives have indicated that the proposed slot casino will employ 605 full time equivalent positions, with an average salary including benefits of \$48,000. Thus the majority of employees will have moderate incomes, very similar to the existing wage scale at local employers. Comparing the employment levels of other gaming establishments such as Twin Rivers, Yonkers, Foxwoods and Mohegan, B&E estimates that after the initial “hard opening” period, employment will stabilize at the 450 to 500 level. An interesting study prepared by the State of New York regarding employment at the Yonkers Casino calculated that for every one million dollars of slot revenue about 3 jobs resulted. Please refer to Table 8 below where estimates of PPE/Cordish facility revenue are calculated. Using a low of \$137,000,000 (at \$300 per machine) that will generate about 411 permanent jobs, at a higher revenue of 182,000,000 (\$400 per machine) creates 547 jobs. As a practical matter actual job numbers will be set by senior management in response to market conditions they face. Thus we see a relationship between revenue per machine and job creation. Later in the discussion of Regional Economy, spin off jobs are estimated. The actual number of spin off non-casino jobs will vary with the actual casino employment. The kinds of jobs to be expected include managers about 10% of the work force, technicians of various sorts: mechanics, electricians, information services, surveillance and security specialists, and gaming supervisors. Lower level wage earners will be wait staff, cleaning personnel and food service workers, about half of the work force. In addition to on site staff, about an equal number of vendors from the region and outside the region (see below Regional Economy) will serve to supply the facility will various kinds of goods and services.

- h. **PROPERTY VALUES** The impact on local property values, the geographic range of any impact can best be illustrated through the following graphics comparing the trends in property values in Leominster Mass and Ledyard, Ct, the main host community for the Foxwoods resort and Casino. Clearly the impact of the 2007 – 2008 economic down turn can be seen in reduced property values. Volatility of pricing is most pronounced in Ledyard, with both communities having adjusted to Market values over the last three years or so, now between \$150k and \$200k. Future impacts on housing in the Leominster market due to the slot parlor cannot be expected to be significant due to the small size of the facility, the availability of housing at affordable prices (around \$200,000) and the larger relative population of Leominster as compared to the towns surrounding the mega casino’s Foxwoods and Mohegan Sun.
- i. **Predictable Impacts on Regional Economy.** Conn Economic Research Center Inc. prepared an economic generation study for both Connecticut casinos in 2005 and updated it in 2007. The determined the “Spin Off effect factor” to be 1.107 non casino Jobs for every Casino Job. State wide spin off factor is an additional .74 non casino jobs not in the local area for every casino job. At that time in 2005 Casino employment was 20220 x 1.1.0 = 42603 total jobs within the County State wide additional jobs: 20220 x .74 = 14963 For Leominster the Cordish company tells us that on site jobs will be 605. At the factor determined for Foxwoods and Mohegan Sun those 605 jobs will result in another 665 non casino jobs in the nearby community. If we add in service jobs of a non-local nature add another 447 jobs. Total new employment: 1270 B&S has indicated before that after the initial year of operations we believe jobs levels will stabilize between 400 and 600, so say 500 for long term employment times the employment factor that will result in 1005 total permanent jobs.

5. OTHER

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

None

B. APPLICANT RESPONSE

None

C. RPA ANALYSIS

None

D. ENF ANALYSIS

None

E. CONSULTANT ANALYSIS

None

F. APPLICATION

None

G. OTHER

NOVEMBER 14, 2013 – COMMUNITY COMMENTS AT PUBLIC MEETING

6 The applicant says, well, Bolton,
 7 you don't understand how the regs. work. It
 8 doesn't really matter who we made agreements
 9 with. In fact, we are just going to look
 10 through the criteria and under your regs.,
 11 Bolton is not severely affected.
 12 That struck me is an odd argument
 13 but it's consistent with this extreme position
 14 that Cordish has taken. They did it in their
 15 RFA application where they named zero
 16 surrounding communities, named no one. They
 17 were then asked is there anyone who's proposed
 18 to be a surrounding community you rejected?
 19 They wouldn't answer that question in their
 20 materials. They said we're negotiating with
 21 people.
 22 As of the time they had filed their
 23 application, there had been zero outreach to
 24 the town of Bolton. But right after the
 1 election, we wrote them and said,
 2 congratulations. We'd like to be considered a
 3 surrounding community. Sent that by certified
 4 mail. They received it in Baltimore four days
 5 before their application. We weren't mentioned
 6 at all. Then we didn't hear from them until
 7 our town administrator reached out a week
 8 later. We didn't hear from them at all. The
 9 first contact with Cordish was the day of your
 10 Lancaster hearings.

11 So, I think the entity here that
 12 doesn't understand the regs. is Cordish,
 13 because they've done zero outreach to Bolton.
 14 Secondly, when their so-called
 15 outreach began, the form of the outreach was a
 16 form agreement that they have entered into with
 17 the other towns the terms of which they
 18 explained to us was if you sign this agreement,
 19 you're a surrounding town. If you don't sign
 20 this agreement, we're going to oppose your
 21 petition.
 22 We said, can't we separate these
 23 issues? Can't we just decide that we are a
 24 surrounding town and then we will work through
 1 the good-faith negotiations? Cordish's
 2 position was no. You sign the agreement and
 3 you're a surrounding town, otherwise you're
 4 not. I think that is consistent with this
 5 extreme position no one is a surrounding town.
 6 That they have picked this unique area of
 7 Massachusetts where no town is affected, will
 8 be adversely affected by their establishment.
 9 And I think that is inconsistent with the
 10 Legislature's intent. It's inconsistent with
 11 your rules.

NOVEMBER 14, 2013 – APPLICANT COMMENTS AT PUBLIC MEETING

11 CHAIRMAN CROSBY: Obviously, we are
 12 not competent to make these decisions by
 13 ourselves. So, this debate will be for the
 14 experts to talk about. We'll listen.
 15 The issue before us is whether or
 16 not certain towns should be deemed surrounding
 17 communities. And it sounds to me like your
 18 position at least in two or three of the cases

19 -- at least in two of the cases is not that
 20 they shouldn't be surrounding communities, but
 21 that you want to speak to the issue of the
 22 nature of the surrounding community agreement.
 23 Because if Townsend is a surrounding community,
 24 it seems like pretty logical that Lancaster or
 1 Bolton is going to be a surrounding community.
 2 MR. WEINBERG: Let me address that.

3 There is a difference between entering into a
4 cooperative amicable agreement with a town
5 under the statute, which is one of the ways a
6 community can be designated a surrounding
7 community versus where an amicable agreement
8 cannot be reached, then you have to go to okay
9 there is a test set down.
10 And there are certain parameters set
11 down under the statute. And we do not believe
12 any of the petitioning jurisdictions meet the
13 test of a significant adverse impact from the
14 facility.
15 If we go to the next slide, we
16 cannot ignore because there's a balancing act
17 of the positives, the negatives if any. When
18 you look at the positive impacts of the
19 facility in terms of jobs, we have over 1200
20 jobs construction, permanent direct and equal
21 number of indirect. We have a \$30 million
22 annual payroll. We have over \$20 million in
23 goods and services that we are buying in the
24 area on an annual basis. We have tremendous
1 support from all of the areas Chambers of
2 Commerce, businesses, attractions,
3 universities, community colleges, workforce
4 development, the venues in the area.
5 We have the program with the
6 University of Massachusetts where we're funding
7 between \$1 million and \$1.5 million a year to
8 grow new businesses in the medical device
9 industry and to get those companies to
10 manufacture in the north central area. We will
11 be a major charitable giver in the area.
12 So, there is tremendous positive
13 impact that the communities around us will
14 receive the benefit of and we want them to.
15 And that's why we're all doing this.
16 But when it comes to do they meet,
17 do the petitioning communities meet the test of
18 a surrounding community under the statute, what
19 we've done in an amicable way with any other
20 community is really not relevant.
21 CHAIRMAN CROSBY: Your position on
22 Lancaster is they don't actually qualify as a
23 surrounding community but you gratuitously have
24 done a surrounding community agreement with
1 them because of the way in which they have
2 negotiated with you?

3 MR. WEINBERG: We don't believe that
4 we have significant and adverse impacts on
5 Lancaster, but clearly they actually have a
6 border that touches where we are. So that was
7 one that we would say was very important to
8 come to terms with.
9 We would say after Lancaster, in the
10 terms of -- We want to reach amicable agreement
11 with all of the communities we share up there.
12 But when we believe that the terms are not
13 acceptable to us in terms of what has been
14 discussed, for instance take Bolton for
15 example. We have a final agreement that was
16 presented to their board of selectmen last
17 night or two nights ago. We have worked hard
18 to try to reach --
19 CHAIRMAN CROSBY: And what happened
20 with that?
21 MR. WEINBERG: They rejected it two
22 to one.
23 CHAIRMAN CROSBY: So, one of the
24 selectman thought it was okay and two thought
1 it wasn't?
2 MR. WEINBERG: Yes. And if you read
3 the comments, just so you have a flavor of the
4 difficult position everybody is in here, when
5 you read the comments that were in the paper
6 and I don't know if it was this morning, but I
7 just saw the article this morning, the comments
8 coming out of the selectmen, who I never met
9 with by the way -- The gentleman who made the
10 presentation, he made a lot of comments, I
11 never met with him. We met with the town
12 administrator. And we worked through an
13 agreement.
14 The comments from the selectmen were
15 not -- the agreement doesn't work because it
16 doesn't address this specific impact that we
17 have. The comments are we can do a better deal
18 or we should get what Leominster got. Or we
19 should get a larger piece of what Leominster
20 received. Or the facility is going to make a
21 lot of money. They ought to pay us more.
22 So, those are the types of
23 impressions out there that some of these boards
24 have. I'm just quoting what is in the paper.
1 I wasn't there. So, I can't say whether the
2 quotes are accurate or not. But that is what

3 was reported.
4 That is not what the intent of this
5 process was. It was to identify impacts to the
6 extent they are identifiable and to try to
7 address it. And that's what we have done.
8 For instance, just to give you a
9 sense, the agreement with Bolton -- By the way,
10 the agreement we have with all of these
11 communities on the issue of traffic and the
12 cost of that traffic, it self modulates. So,
13 the community gets compensated based on the
14 actual impacts they have. So, there is a
15 misunderstanding by, and I think there is a
16 misunderstanding in Bolton that somehow they
17 should get more than the other guy got because
18 if they have more traffic incidents the way we
19 have approached it, then they get more because
20 it's based on that actual experience.
21 Again, to answer your question, we
22 do not believe they meet the test or any of the
23 other petitioning communities meet the test of
24 a surrounding community. We think the fact
1 that we have signed and we've done a good job
2 of trying to bring other communities into the
3 fold and have negotiated successfully five
4 agreements, to hold that against seems to be
5 (INAUDIBLE) to the whole intent of the process.
6 COMMISSIONER MCHUGH: So, if I
7 understand your position, just to make sure I
8 do understand it, apart perhaps from Lancaster,
9 none of the communities is a surrounding
10 community within the meaning of the statute and
11 the regs. But you've negotiated agreements
12 with them, so you don't get to the factor test.
13 MR. WEINBERG: Exactly.
14 COMMISSIONER MCHUGH: And nobody
15 should against the you the fact that -- or use
16 as a precedent the fact that you entered into a
17 surrounding community agreement with a
18 community that is not really a surrounding
19 community.
20 MR. WEINBERG: You said it much
21 better than I did. Yes, I agree.
22 COMMISSIONER MCHUGH: No, I just
23 want to make sure I understand.
24 CHAIRMAN CROSBY: You did, Judge.
1 MR. WEINBERG: That's a very clear
2 summation. I'm happy to answer any questions.

3 CHAIRMAN CROSBY: What are the
4 essential terms of the deal with Lancaster, the
5 agreement with Lancaster same as the one you
6 put up before?
7 MR. WEINBERG: This is not the
8 Lancaster agreement, but I'll tell you --
9 CHAIRMAN CROSBY: But are they the
10 same?
11 MR. WEINBERG: Lancaster is slightly
12 different.
13 CHAIRMAN CROSBY: So, I'm asking
14 about Lancaster.
15 MR. WEINBERG: So, on Lancaster
16 there's an annual community impact fee payment
17 of \$35,000 per year. We agreed to pay them up
18 to \$200,000 to do road design on an
19 intersection that they believe they are having
20 issues with today. So, we agreed to fund the
21 road design work. Any improvement there we
22 will benefit from as well.
23 Then it has these additional
24 provisions. This is true of the five that we
1 have signed. There is a public safety response
2 cost reimbursement, which is we reimburse the
3 actual cost for police and fire responses
4 caused by our facility.
5 We have created what we call a
6 surrounding community benefit payment, which is
7 a rising scale of a percentage of our gaming
8 revenues over a breakpoint, which starts at .25
9 percent and rises to one percent. So, the idea
10 was that we achieve great results in the
11 facility that the communities will shared in
12 the benefits.
13 CHAIRMAN CROSBY: The .25 to one is
14 for each of the communities that signed this or
15 is this a pool?
16 MR. WEINBERG: It's a pool that
17 would be shared by those communities that enter
18 into --
19 CHAIRMAN CROSBY: And what is the
20 breakpoint?
21 MR. WEINBERG: The first breakpoint
22 is \$200 million. Cooperation in seeking funds
23 from the community impact fund from the state.
24 Local hiring preferences, local vendor
1 preferences for the facility, of course our
2 ongoing commitment for running a responsible

3 gaming program at the facility. Participation
4 in regional marketing and tourism and cross-
5 marketing programs with both the communities
6 and their businesses. Then we also provide for
7 the reimbursement of the town's cost in
8 negotiating the agreement with us.
9 COMMISSIONER STEBBINS: Do the local
10 hiring and local vendor preference dilute
11 anything that was in your agreement with the
12 city of Leominster?
13 MR. WEINBERG: It is all subject to
14 the host agreement. So, we believe that the
15 people we will be hiring and the businesses
16 that we will be doing business with that there
17 is not sufficient capacity in Leominster to
18 satisfy all of our needs. So, we believe that
19 there is a major opportunity for the whole
20 area.
21 CHAIRMAN CROSBY: Is there a
22 reopener of some sort in the Lancaster deal?
23 Take for example, if your estimation that the
24 eight percent increase doesn't move it from one
1 category down to another, if it did, if it were
2 15 percent instead is there any kind of a
3 reopener?
4 MR. WEINBERG: There is not a
5 reopener. One of the reasons for the
6 participation in the community benefit fund was
7 there may be some relationship between our
8 revenues that we are doing and the type of
9 traffic we're generating. So, that would
10 provide additional compensation to the
11 communities.
12 Of course, the community impact fund
13 that is being created under the gaming tax to
14 the state, that is really the very reason for
15 the use of those impact funds are things today
16 we can't sit here and say that is going to be
17 an issue. That fund is to address needs in the
18 future.
19 CHAIRMAN CROSBY: The way we've
20 characterize that fund is that it will be
21 available for unanticipated or unanticipatable.
22 The fact that your eight percent number by your

23 own discussion, the number of public safety
24 incidents you can claim one thing, somebody can
1 claim another. Nobody is going to really know
2 it until it's over. So, you put in a sliding
3 scale which seems eminently fair. You might
4 very well take the same approach towards
5 traffic.
6 COMMISSIONER ZUNIGA: I wanted to
7 ask about the MEPA process that you will be
8 required to do and follow through, can you
9 expound a little bit on what those improvements
10 may look like currently in that intersection?
11 MR. WEINBERG: Under the MEPA
12 process, we followed our ENF filing. Part of
13 that process is then there is a scoping in
14 terms of anything else the state wants us to
15 look at. That is also instructive on the whole
16 issue of the surrounding community agreements.
17 Because MEPA did not require us to
18 look at any roads in Sterling and Fitchburg or
19 any of these communities. There was one
20 intersection which they wanted us to look at
21 which the state is already looking at which is
22 the intersection of 495 and 117. And it's
23 really part of a potential revenue share in
24 whatever improvements.
1 If it is anticipated we are going to
2 cause -- And this will come out during our EIR,
3 to the extent that we are exacerbating the
4 problem there, then we would be required to
5 share in the cost with the state and other
6 users in any improvements at that intersection.
7 I have my traffic consultant just to make sure
8 I'm being accurate.
9 By the way, when the Walmart was
10 built in the same area, there was no
11 requirement to look at any roads by MEPA in
12 Fitchburg or in Sterling because it wasn't
13 anticipated that there would be any
14 exacerbation of problems with those roads. So,
15 that is also something that is very instructive
16 in terms of the validity of our traffic
17 projections.

TRANSCRIPT OF PUBLIC MEETING IN LEOMINSTER 10/21/2013

MR. LOWE: Donald Lowe, 17 Hughes
11 Street, Clinton. I'm the town
12 administrator for Bolton. I thank you for
13 not allowing the previous speaker to
14 cannibalize me.
15 Before I get started, I'd just like
16 to say I think the Commission should be
17 commended for -- both for having these
18 types of hearings, and for the quality of
19 your Web site. The information that you've
20 been getting up on the Web site is really
21 very timely, very helpful, and the work of
22 your ombudsman, who I've spoken with
23 several times has also been very, very
24 useful, so I --
1 CHAIRMAN CROSBY: Great.
2 MR. LOWE: -- I thank you for that.
3 CHAIRMAN CROSBY: Thank you.
4 MR. LOWE: I'm not here to speak in
5 opposition or in favor of this proposal.
6 I'm here to state that, while Bolton it is
7 not a touch town to Leominster, we are --
8 clearly, should be considered a surrounding
9 community.
10 I've been watching the papers and
11 I've been drawing some -- some comments.
12 And one of the comments from Cordish, from
13 Mr. Weinberg was, we know how to draw
14 traffic to our projects, and I believe him.
15 In another article, I read where
16 Mr. Weinberg dismissed local traffic impact
17 concerns. He said there'll be no
18 detectable increase in traffic on local,
19 secondary and tertiary roads, and that
20 Interstate 190 would handle almost all of
21 the traffic.
22 I don't believe that part. I've
23 lived -- I'm 54 years old. I've lived here
24 all my life and I know this area. This
1 project from a traffic standpoint will have
2 a significant impact on Route 117 in Bolton
3 and Lancaster. To try to bear that out --
4 I don't accept the argument that most of
5 the customers that will go to this
6 establishment are coming from the western
7 part of the state, or 90 percent of the
8 traffic is going to come off 190.
9 Just for the purpose of an

10 illustration, I went to Google Maps and I
11 plugged in the address of the town halls of
12 Milford, Natick and Framingham, assuming my
13 colleagues may like to play some slot games
14 as well. Every one of the Google Map
15 searches sends traffic through -- up 495
16 north over 117 west. They do not send you
17 to 290 to 190. Anybody that lives in this
18 area knows that you'd be backtracking if
19 you would do that. And people that also
20 know this area know you'll avoid Route 2 at
21 all cost, if you've experienced it a few
22 times.
23 So that is anecdotal evidence, but,
24 yet, I think it makes a point. I'd also
1 like to point out to the Commission that
2 the vote on Leominster, the successful vote
3 was September 24th. On September 26th I
4 sent a letter to Mr. Weinberg
5 congratulating Mr. Weinberg and Cordish on
6 their success. It was received at -- at
7 their headquarters in Baltimore on
8 October 1st. I was somewhat surprised to
9 see that we weren't listed in their
10 application as a community that had been
11 requested -- had requested to be considered
12 to be a surrounding community, since we had
13 that letter in three days before that
14 deadline.
15 It's now October 21st, and I'll be
16 having my first substantive discussion with
17 representatives from Cordish after this
18 meeting today. Three weeks seems to be a
19 bit long for that type of process when we
20 know that October 31st is the deadline.
21 I'm hopeful that I'll be able to work
22 something out amicably with Cordish. If
23 not, I will be availing -- the Town of
24 Bolton will be availing itself of the
1 process that you've established to petition
2 the Commission to designate us a
3 surrounding community.
4 And in closing, I'd just like to
5 say, the traffic studies that have been
6 shown state a 10-percent increase in
7 traffic, or 10 percent of the traffic going
8 to this facility, which isn't just slot
9 machines. I remind everyone, it's also --

10 it's also entertainment, it's also dining.
 11 So there's more than 1250 slot machines
 12 there. 10 percent of that traffic is not a
 13 reasonable expectation. Probably, 30
 14 percent is more like it.
 15 I invite any of the Commissioners
 16 when you go home today, if you're going to
 17 be going to 495 to go over 117 east to get
 18 back to 495, and tell me about the existing
 19 conditions, nevermind whatever exacerbation
 20 may be there. Because I guarantee you, if
 21 it were 10 percent, and I don't agree it
 22 is, that's an impact. 30 percent, which is
 23 probably more like it, I think, is an
 24 enormous impact. And I don't think it
 1 should prevent the project, necessarily,
 2 but I do think we deserve the status of a
 3 surrounding community. Thank you.

MR. HEALEY: Good afternoon. My
 24 name is Bob Healey and I am the chief of
 1 police for the city of Leominster. I'm a
 2 35-year veteran and a 50-year resident of
 3 the north Worcester County area. I list my
 4 address at 29 Church Street in Leominster,
 5 but I do reside in another community that
 6 claims it's an affected community,
 7 Fitchburg.
 8 The number one call for service
 9 locations for police officers in Leominster
 10 respond to is the Whitney Field Mall. It's
 11 the largest, oldest mall in the area, and
 12 we respond there, roughly, three to five
 13 times per day for crimes of juvenile crime,
 14 larcenies, shoplifting so on and so forth.
 15 We are also, you would have to say, the
 16 mecca for shopping in the area because we
 17 are surrounded mostly by smaller
 18 communities, and I say tongue in cheek, we
 19 are the affected community because they
 20 come to us. They come through Lancaster,
 21 Bolton, Fitchburg and they come a lot from
 22 Fitchburg, Lunenburg, Lancaster, Sterling
 23 so on and so forth.
 24 In the early 1980s former Mayor
 1 Richard Girouard had proposed the
 2 Jungle Road area for industrial development
 3 going so far as to wanting to change the
 4 name, Jungle Road, which we all in
 5 Leominster hold so dear, we all hung around

6 over there, to Corporation Drive. But as
 7 you can see, Corporation Drive certainly
 8 wasn't hold there. No industry is coming,
 9 and I doubt much would even come, if this
 10 proposal did not go forward.
 11 In the late 1980s, as Detective
 12 Aubuchon alluded to, the Pyramid Mall
 13 Company proposed a \$75 million mall there
 14 and that did not, of course, happen. So
 15 again I say, tongue in cheek, I'm not in
 16 favor of any mall, and I wouldn't suspect
 17 anybody else in this room would want
 18 another mall that would bring, certainly,
 19 more crime to that area. That's just what
 20 retail establishments do do.
 21 Now, I did travel to Maryland. I
 22 did. I was a guest of the Cordish company.
 23 They did show me around. I was able to
 24 meet the mayor of Anne Arundel County.
 1 Visited Baltimore, the casino. Met with
 2 the police chief there, fire chief, Chamber
 3 of Commerce, vendors. And coming away from
 4 that and doing my own reflection and study,
 5 and not wanting to, you know, beat a dead
 6 horse, but the Leominster Police Department
 7 often sits at the bottom of the totem pole
 8 for infrastructure funding. The Cordish
 9 company has graciously offered us 1,000
 10 square feet. I would certainly offer that
 11 to my colleague from Lancaster, if he needs
 12 to have an extra desk.
 13 I think that the revenue stream that
 14 is offered and promised towards Leominster,
 15 and as a police chief, what's important for
 16 me is to make my residents and officers
 17 know that we can respond there effectively,
 18 that the crime would be addressed, if any.
 19 And I'm not convinced, at all, for one iota
 20 that it would go up or down. I think it
 21 depends on the demographic and, certainly,
 22 the planning, and the relationship that you
 23 would have with the company operating the
 24 casino.
 1 I actually have -- I have a good
 2 relationship with them, a professional one
 3 with them. And having to see how they
 4 operate in Maryland, I am very, very
 5 confident that this project would be
 6 nothing but a benefit nor the community and
 7 plus for the officers of the Leominster
 8 Police Department. Again, thank you so

9 much for your time.

MR. VALLEE: Travis Vallee,
 22 79 Priest Street in Leominster, Mass. I'm
 23 here talking -- first, I'm going to talk
 24 for the Leominster Fire Union, Local 1841.
 1 We did meet with the Cordish company. Our
 2 union overwhelmingly support the project.
 3 As far as safety, people coming in and out,
 4 the rescues, we don't see an issue with it.
 5 We have other areas in the city that we
 6 take care of. There's no issues. There
 7 are private ambulance company also, if we
 8 have issues. Before we call mutual aid, we
 9 call a private ambulance company, so that
 10 shouldn't be much of an issue.
 11 The part about traffic and stuff, I
 12 do agree with the Lancaster and Bolton will
 13 be affected. As far as Fitchburg, my
 14 shop -- I'm also a business owner, and my
 15 shop is located on the main road from
 16 Leominster to Fitchburg, and traffic's
 17 always going towards Fitchburg backed up.
 18 People go through Leominster to get to
 19 Fitchburg, so that's where I want to stand
 20 with that issue. Leominster, people do
 21 come through Bolton and Lancaster, they
 22 will be affected traffic-wise. Fitchburg,
 23 I don't see an issue at all. People not
 24 from the area, if you check it out, I think
 1 you'll see the same thing. I was on the
 2 police department in Leominster seven
 3 years. I'm also a veteran. I've been on
 4 the fire department for 11 years.
 5 So the fire department, as far as
 6 the casino issue, we don't see any issue
 7 with our fire department. We're the
 8 largest fire defendant in this area, and we
 9 don't have an issue with the safety of the
 10 people coming to the casino. Thank you.

MS. CUTLER: Hi, I'm Ellen Cutler.

7 CHAIRMAN CROSBY: I'm sorry, your
 8 last name?

9 MS. CUTLER: Cutler, C-U-T-L-E-R.

10 CHAIRMAN CROSBY: Cutler.

11 MS. CUTLER: I live on 1887 Main
 12 Street, Lancaster, right on Route 117. We
 13 purchased our house 41 years ago before

14 I-190 was in there and 495 was a relatively
 15 new highway.

16 Traffic has increased over the years
 17 due to the Walmart store, now there's a new
 18 McDonald's, a new truck stop going in down
 19 the other side of the hill. And because of
 20 the increased traffic, we no longer can
 21 open our front windows in our house. We
 22 had to put an addition on the back of our
 23 house in order to be able to even hear the
 24 TV. And the traffic runs, basically from
 1 six in the morning to approximately eight
 2 o'clock at night constantly. And We've
 3 counted as many as 50 cars before we can
 4 even get out of our driveway. I feel with
 5 the casino it will be later traffic at
 6 night. So not only will we have traffic
 7 all day long, we'll be up all night with
 8 traffic coming and going on Route 117.
 9 Sometimes -- there's a traffic light in
 10 Bolton, down 110 and 117. At the traffic
 11 light there's right -- we're able to get
 12 out of our driveway, but it's been very,
 13 very difficult.

14 On October 7th -- well, 1st of
 15 October the Cordish company had proposed to
 16 buy 16 acres off Jungle Road for a slot
 17 parlor. And now on October 7th I see in
 18 the paper that they plan to buy an
 19 additional 10 acres for a casino and
 20 possibly a hotel, and parking for 900 plus
 21 cars, which is an additional cars on the
 22 road to their casino. I just want to know,
 23 how are they going to monitor the traffic
 24 when they say there won't be a traffic
 1 impact, when it already is an impact today
 2 and just going to compound it.
 3 Lancaster has the mall at Whitney
 4 Field, the mall where Kohl's is, the
 5 Walmart mall, but Lancaster does not
 6 receive any benefits for any of these
 7 business. But, yet, Lancaster has to
 8 maintain these roads, provide police and
 9 emergency services when there are accident
 10 issues on these roads. So I feel that it's
 11 really not beneficial to Lancaster or the
 12 people that live on 117 to have this
 13 proposal for a casino put in our area.
 14 Thank you very much.

MS. CHAMBERS: Hi. I'm
 22 Marilyn Chambers, and I live at Creamery
 23 Road, so my back yard is 117. So my house
 24 isn't that far. There's a bad corner right
 1 just before you get to my house from --
 2 coming from Bolton. There's been truck
 3 accidents there. And people do drive a lot
 4 faster on 117 than the signs say. You
 5 can't -- and between, I think, 4:30 and
 6 six o'clock every day there was a -- during
 7 the week there is a lot of traffic because
 8 people coming home from work from jobs.
 9 Also, I'm not very far from
 10 Main Street, and where Main Street goes
 11 into 117, I've waited 10 minutes there to
 12 get onto 117. We have no traffic lights.
 13 I think there's a blinking light, maybe,
 14 but there's no traffic lights there so
 15 you've got to wait until everybody gets out
 16 on 117.
 17 And one of the things is, I have
 18 disabilities and I have fallen several
 19 times, and the Lancaster Fire Department
 20 comes out and gets their exercise training
 21 by picking me up. And if there was a
 22 backup on Main Street, and then they're
 23 only right around the corner from my house,
 24 the fire department, they wouldn't be able
 1 to get up there unless they could, you
 2 know, get people to move.
 3 So that's what my concern is, the
 4 traffic on 117. That it's really bad and
 5 -- because I've been there 40 years so the
 6 traffic doesn't bother me, I'm used to it
 7 but it is very busy. You can sit there in
 8 the window and watch, and it's constant
 9 cars going both ways.
 10 So that was my main -- I have no
 11 feeling one way about the casino, but the
 12 traffic on 117 is my biggest. They should
 13 be -- and all the streets coming into 117,
 14 like Brockelman Road and Ponakan Road, and
 15 Route 70, Lunenburg Road, all those roads
 16 are going to have the same problem as we
 17 have on Main Street for traffic getting
 18 onto Main Street. And that was all I
 19 wanted to say. Thank you.

MS. FREIDA: Thank you,
 11 Mr. Chairman. I wasn't going to speak. My

12 name is Claire Freida. I am a city
 13 councilor in Leominster. I'm a 26-year
 14 elected official, six years on the School
 15 Committee, and 16 years representing the
 16 area that the casino is proposed. Four
 17 years as a councilor-at-large.
 18 I still live in the area that the
 19 casino is proposed. It's probably a
 20 quarter mile from my home. I've lived
 21 through the New England Development,
 22 massive mall situation. I lived through a
 23 divisive community that fought on both
 24 sides. There's a real passion when there's
 1 a big project that's proposed, and rightly
 2 so.
 3 The community voted to accept this
 4 proposal. It was a 60-percent vote. But
 5 the parts of it, there are five wards, 15
 6 precincts, and out of those -- that entire
 7 area, all but one was opposed to the
 8 casino, which is the area that I live in,
 9 and understandably people that are
 10 concerned surrounding the casino area. I
 11 travel 117 very often.
 12 I'm very proud of Leominster. We've
 13 worked hard in our city. We were bankrupt
 14 20 years ago, pretty near bankrupt. We've
 15 worked hard to produce tax incentives, keep
 16 our tax rate at a single tax rate. We work
 17 very diligently. We're very proud of our
 18 community. I don't believe that our
 19 citizens would have voted for something
 20 that is going to damage our community.
 21 We've worked closely with the
 22 Cordish company. I know that there's --
 23 there is perception that the counsel hasn't
 24 been involved. I think there was a
 1 laid-back approach because it was a
 2 referendum and none of the counsel wanted
 3 to influence the vote. So one on one, for
 4 anybody that called me, knew what my
 5 position was. I spoke with the company.
 6 Their assistance in a lot of the areas in
 7 the community seemed to be different than a
 8 lot of the other massive casino moguls are
 9 proposing in different areas.
 10 The people have spoken, it's our
 11 responsibility to watch -- we have
 12 regionalized a lot. I think the Chamber
 13 can reiterate. We coordinate with the
 14 Johnny Appleseed visitor center. We've

15 coordinated with water and sewer to the
16 town of Lancaster. We've participated
17 regionally. And I don't see this to be any
18 different.
19 117 is a problem. I don't think
20 anybody will dispute that. I travel to the
21 Cape, I come that way. But when I know
22 there's something going on at the Bolton
23 Fairgrounds that you can't get through, I
24 Route 2 to go -- it's a little bit longer,
1 but I'll take Route 2 to 495. There are
2 some alternative routes. I'm not expecting
3 that people should do that. But I do think
4 117 needs to be addressed. And I do
5 support that, and I think our community

6 would support that. That, to me, is the
7 largest mitigating issue you have to deal
8 with.
9 But Leominster is a very proud
10 community. We would not allow anything
11 that would hurt our children, hurt our
12 schools, hurt our community, because we're
13 much to proud of that. We've worked too
14 hard to get where we are.
15 So while I'm speaking in support, I
16 also speak in looking at the mitigation for
17 the surrounding community, particularly,
18 Bolton and Lancaster, and Sterling. Thank
19 you.

6. POSITIVE IMPACTS

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

The Applicant noted several positive impacts from the development including approximately \$20 million that may be spent annually on local goods and services.

A. COMMUNITY PETITION

None

B. APPLICANT RESPONSE

POSITIVE IMPACTS

25 CMR 125.01(2)(c) specifically states that in determining whether a jurisdiction qualifies as 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." In this case, the benefits to the Town will far exceed any negative impacts. PPE has committed to preferential hiring for Leominster and neighboring communities. In addition, the Project, which is expected to spend approximately \$20 million annually on goods and services, is committed to working with local businesses from those communities. The job opportunities for the Town's residents at the Project and the purchasing and cross marketing opportunities for the Town's businesses with the Project are positive impacts for the Town.

PPE has received the endorsement of local and regional chambers of commerce, businesses, performing arts venues and attractions and has entered into agreements to participate in regional marketing and cross-marketing programs with same. This is a strong message from the business community that the Project is anticipated to be a strong economic engine for the entire region, particularly for the tourist attractions in the Town such as the Nashoba Valley Winery and Bolton Orchards. PPE has entered into cooperation agreements with the Massachusetts Casino Careers Training Institute (representing the State's community college system) and Fitchburg State University, which includes agreements to work together on workforce development, internship programs and cross-marketing efforts between university cultural attractions and the Project. In fact, leaders of the Massachusetts Casino Careers Training Institute have visited Maryland to learn how PPE's affiliate has implemented joint ventures with the regional community college and its Maryland Live! casino and how this model can be applied in Massachusetts.

PPE has also entered into a partnership with the University of Massachusetts Medical Device Development Corporation to provide funding of up to \$1.5 million per year to support new high-tech business development in the north-central region, which includes the Town. This program is expected to generate 5,000 direct and 15,000 indirect jobs in the region. Therefore, the impact on public education in the community and the increased opportunities that will be created for students and graduates will be extremely positive and the Project's impact on the regional unemployment rate will be enormous.

C. RPA ANALYSIS

None

D. ENF ANALYSIS

None

E. CONSULTANT ANALYSIS

None

F. APPLICATION

None

G. OTHER

None