

MASSACHUSETTS GAMING COMMISSION SURROUNDING COMMUNITY PETITION ANALYSIS



COMMUNITY:
APPLICANT:

CITY OF FITCHBURG
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

Although Fitchburg and Leominster share a border, Fitchburg and the proposed gaming facility are not as proximate. As noted in the Fitchburg petition, “the distance to the gaming establishment is less than 10 miles.” The proponent notes that “[t]he project is located approximately 6.5 miles from the nearest City neighborhood” and notes that the driving time to Fitchburg’s downtown (18 minutes), “is approximately the same time it takes to drive from the location of the project to the City of Worcester, which clearly is not in proximity to the Project”. 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

¹ See “Surrounding Communities Amendment” document included in December 12, 2012 Commission Meeting Packet.

A. COMMUNITY PETITION

A. THE CITY BORDERS THE HOST COMMUNITY AND IS IN CLOSE PROXIMITY TO THE PROPOSED GAMING ESTABLISHMENT (M.G.L. c. 23K, §§ 4(33) and 17(a); 205 CMR 125.01(2)(b)(1)).

1. The City is contiguous to the Host Community and both communities share a 7 1/2 mile border that extends for some distance generally along State Route 2, as demonstrated in Exhibit 1 attached hereto and incorporated herein.

2. The City and Host Community are geographically located in Northern Worcester County and are primarily interconnected by State Routes 2, 12 and 31. In fact, State Route 12 provides a direct primary route between the City and the proposed gaming facility. Please refer to Exhibit 2 attached hereto and incorporated herein.

3. The commuting time by car from the City's downtown to the Host Community's downtown center is less than 15 minutes. The center of the City from the center of the Host Community is approximately 5 miles and the distance to the proposed gaming establishment is less than 10 miles. The driving time from the City's downtown to the gaming facility is estimated at approximately 18 minutes; and from the southern border of the City, including residential areas, in less than 10 minutes. It is worth noting that over 87% of City residents who commute do so via automobile, according to the U.S. Census Bureau's 2010 Census. Moreover, the Massachusetts Bay Transportation Authority and Montachusett Regional Transit Authority (MART) interconnect the City and Host Community via a 7 minute train ride and 15 minute bus trip, respectively. The Montachusett Regional Planning Commission ("MRPC") concurs with the information appearing in this Paragraph 3.

B. APPLICANT RESPONSE

THE CITY IS NOT IN PROXIMITY TO THE PROJECT

Although Leominster and the City share a border, the City is located to the north of Leominster and the Project is located in the far south of Leominster. The Project is located approximately 6.5 miles from the nearest City neighborhood and 9 miles to the center of the City. The City's Petition notes that it takes 18 minutes to drive to the site of the Project from the City's downtown. That is approximately the same time it takes to drive from the location of the Project to the City of Worcester, which clearly is not in proximity to the Project. The City is not in proximity to the Project. However, if the Commission were to find that the Project was in proximity to the City, the City has not and cannot demonstrate that the Project is likely to cause any significant and adverse impacts on the City.

C. 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 – 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 City of Fitchburg argues that “not an insignificant amount of “7,800 projected vehicle trips per day (“VPD”) will travel through the City.” It also notes that “[t]he primary access route to the slot parlor... including residents of New Hampshire, are slated to be Route 2 and 12, which transverse the City.” The City notes that Route 12 is a heavily congested roadway with approximately 22,000 VPD near Leominster approximately 30,000 VPD on Route 12 near Route 2.

The Applicant argues that “[t]he market study and traffic studies show there will be almost no measurable traffic impacts on the City’s primary thoroughfares (Route 12 and Route 31)”. The Applicant notes that “[t]he Project will add only two PM peak hours vehicle trips to Route 12... and eight PM peak hours vehicle trips to Route 31. These 2 PM peak hours and 8 PM peak hours projections compare to the theoretical 2,800 vehicle per hour capacity of a two-lane, two-way highway. The Applicant also states that the Project traffic will not result in any change in operation level of service at any intersection in the City.

Other analyses conducted on this project impact do not state that Fitchburg traffic infrastructure will be significantly and adversely impacted. For example, according to the minutes of the August 27, 2013 meeting of the Massachusetts Regional Planning Council (“MRPC”), although significant concerns were raised about traffic on Route 117 in Lancaster and Bolton and the MRPC analysis recommends the study of those intersections, no intersections in Fitchburg were recommended for study. The MRPC did note potential likely increase in traffic from “Route 12 to the north to NH” and noted that impacts on Route 2 within a 45 minute drive time should be addressed. The City of Leominster peer review of the Proponents traffic plan indicated no significant impact on Fitchburg transportation infrastructure.

The Applicant's Application contains numerous sections that demonstrate that the plans to market up to 60-100 vph including New Hampshire . The Applicant notes that it selected its proposed location due to strategic location at I-190 and Route 117 (2-28).

The Applicant notes that it intends to leverage 1,000 hotel rooms within 10 miles of the property. The Applicant will also market to local customers (2-37).

The Applicants also discusses the recent improvements to Route 117 and the proximity to Route I-190, Route 2 and I-495 (4-23 and 4-3.)

Green International noted 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 Fitchburg.”

“MassDOT comments to date have been in relation to the ENF filed by the Applicant. In that comment letter, the DOT has not mentioned any potential concern relative to State highways in the City of Fitchburg nor called for the Applicant to include any in subsequent environmental studies. One possible reason is that Route 12 in Fitchburg is not under MassDOT jurisdiction.”

“Stantec projects that 80% of the site traffic will use I-190 with 60% oriented to/from the north connecting to Route 2. Only 10% of the casino traffic is projected to travel to/from the west along Route 2. There is no clear information presented by Stantec as to how much of that would travel through the City of Fitchburg. There was no study of Route 2 or areas further east-west along Route 2 submitted thus far by the Applicant. There is some question as to the amount of site traffic forecasted to/from the west and north including Fitchburg. Based on information reviewed, it is conceivable that more than 10% of casino traffic trips could be oriented to/from this general area. “

“Route 12 is primary route through Fitchburg 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 between Route 2 and the downtown area during weekday peak periods as well as during portions of Saturday. A section of the roadway near Route 2 and into Fitchburg has undergone recent improvements by MassDOT, however, it remains a two lane arterial for the most part as right of way constraints exist and acquisition by the City was not accomplished. The regional planning agency has identified several high crash locations along the route north of Route 2. The Route 2/Route 12

interchange remains a concern in the region. Route 12 connects with Route 31 in the center of Fitchburg, which Route 31 continues north and provides connections to communities in southern New Hampshire. As a result of remaining a two lane arterial with a number of access drives and intersecting ways, current congestion issues will remain in the future regardless of the proposed casino.”

“Access connection – The proposed casino site is situated approximately 9 miles to downtown Fitchburg. There is no direct route connection between the City and the casino site, however, Route 31 to Route 12 runs into Leominster and then connects with Route 117 in Downtown Leominster. One could also connect with Route 2 at Route 12, travel to I-190 and then to Route 117. In any event, while Fitchburg is proximate to Leominster, the City’s level of direct connectivity in relation to traffic and access to the casino should be considered low.”

“Projected changes level of service (LOS) – There was no analysis done by the Applicant for Route 12 in Fitchburg. The southern portion of Route 12 was recently improved by MassDOT but within Fitchburg, it remains a two lane arterial. Consequently, there are times under existing conditions that congestion and motorists’ delays are experienced. If one presumes 5% of the casino traffic would travel along Route 12, this would amount to approximately 25 vehicle trips during the PM peak hour and approximately 40 vehicle trips during the Friday/Saturday peak hours of the casino. Those locations that currently experience long delays will continue to do so with the project, however, at these levels of added traffic, there would not be a noticeable change in congestion and delays. While we believe that there is a reasonable possibility that more casino related traffic would be oriented to the west and north (including Fitchburg Route 12) than was predicted by Stantec, the likelihood of a negative change in LOS even if the estimated traffic was doubled, would be small. Again, many of the key locations presently experience low levels of service during peak periods.”

“Increased traffic volumes on local streets – Based on the noted 5% estimate on Route 12 one could assume from the Stantec study, it would result in approximately 25 additional vehicle trips on the roadway during the PM peak hour and approximately 40 during the casino peak periods Friday and Saturday evenings. Compared to the current route 12 volumes, the increase in traffic on Route 12 is estimated to be approximately 1-2 % during the PM peak hour. This would typically be considered a small impact.”

“In view of several factors including the relatively close proximity that Fitchburg is to the site (i.e. less than 10 miles and less than 30 minute drive); its population level; 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 west and north in this region may be low. This should be further reviewed in the MEPA process since the Applicant provided limited supporting information in this analysis area."

"However, if the Applicant's projections are off by a factor of 2 for example, it would result in 20% to/from the west and north and potentially 10% site traffic finding its way to Route 12 north of Route 2. If 10% were assumed to travel through Fitchburg, that would result in 50 to 76 new vehicle trips occurring in the same three time periods noted above. These new trips would increase Route 12 peak hour volumes by approximately 2-4% depending on where one is along the corridor. "

"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. At this time the source of construction materials is not known. However, with I-190 and Route 2 nearby, it is anticipated that the longer material delivery trips would be via these two routes. In addition, construction traffic, including the facilities for construction material, would be controlled to a degree by the Applicant. Thus, the impact on Route 12 and Route 31 should be minimal. Further, major portions of these two routes have been resurfaced in the recent past and are generally designed to accommodate truck traffic. Consequently, it is not expected that degradation of the road infrastructure of Routes 12 and 31 in Fitchburg would occur as a result of the casino construction."

"Adverse impacts on transit ridership/station parking – The Applicant did not provide any estimate as to the level of casino trips would be via transit, the Applicant has committed to working with the regional transit authority to extend service to the site and has also committed to operating a direct shuttle between the commuter rail station off Nashua Street in Leominster to the site. That said, it is our opinion that transit usage would be low and not create any problems in terms of bus loading capacity or parking problems at the rail station."

"Significant peak vehicle generation on State and Federal highways – The two State highways (but under City jurisdiction) that pass through Fitchburg and would be of potential concern include Route 12 and Route 31. Based on the Applicant's traffic projections as well as the potential higher level of additional traffic volumes discussed above, the proposed casino would not result in a significant peak generation on the State highway located in the City of Fitchburg."

"While there will undoubtedly be some casino related traffic originating from Fitchburg as well as passing through the City, it is not evident based on the

combined information that has been presented, reviewed and evaluated that the facility would likely cause a significant and adverse traffic impact on the subject roadways. The surrounding community determination will need to be based on other factors including geographic proximity to the site and host community and operational concerns other than traffic.”

A. COMMUNITY PETITION

C. CITY TRANSPORTATION INFRASTRUCTURE WILL BE IMPACTED BY THE DEVELOPMENT AND OPERATION OF THE GAMING FACILITY (M.G.L. c. 23K, §§ 4(33) and 17(a); 205 CMR 125.01(2)(b)(2)).

14. In its Environmental Notice Form1 submitted pursuant to the Massachusetts Environmental Policy Act, PPE estimates that it expects an increase of over 7,800 vehicle trips per day ("VPD") as a result of the Project, as demonstrated in Exhibit 6 attached hereto and incorporated herein. Not an insignificant amount of such traffic will travel through the City. . .

15. In its RFA-2 Application, PPE projects that much of that traffic will use State Route 117 and I-190, each of which are interconnected by major and minor arterials traversing the City. .

16. In its RFA-2 Application, PPE projects that the primary market for the Project will be the population living within 60 miles of the Project site. Moreover, PPE projects that a secondary market will extend to a 100 mile ring and include customers traveling by car from New Hampshire.

17. The primary access routes to the slot parlor, identified in Paragraph 16 herein, including residents of New Hampshire, are slated to be State Routes 2 and 12, which traverse the City, and have been identified by MRPC. As with those arterials identified in Paragraph 15 herein, these additional routes are interconnected by major and minor arterials within the City including the John Fitch Highway and State Route 31.

18. According to the City's Public Works Director, arterials servicing the City and Host Community are heavily congested already, particularly during peak commuting times, and particularly include City roads servicing Fitchburg State University, the area's largest undergraduate institution. According to MRPC, traffic volume was counted at 21,900 VPD on Water Street, State Route 12 near Water Street's intersection with Nichols Street, Leominster in 2003. This compares with 22,000 VPD on a count taken in 2012 at the same intersection. Traffic volume increases as one travels on Rt. 12/North Main Street, Leominster to State Route 2. In 2009, volume was at least 29,800 VPD at State Route 12 and Erdman Way, near State Route 2 - traffic volume proceeding northbound was similar.

19. City roads and streets are currently in need of reconstruction, resurfacing and renovation without the increased use contemplated by the Project. Recognizing this, the City most recently received \$1,132,000 under the Chapter 90 local roads program administered by the Commonwealth; however, this is far below the demonstrated need of \$2,250,000 per year, according to the City's Public Works Director.

B. APPLICANT RESPONSE

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

The market study and traffic studies show there will be almost no measurable traffic impacts on the City's primary thoroughfares (Routes 12 and 31). Any new traffic generated by the Project on these routes would be drawn from communities in northern Massachusetts and southern New Hampshire located just north of the City. Communities located north of the City along Route 12 will generate approximately 0.4% of the Project trips while communities located along Route 31 will generate approximately 1.5% of the Project trips. The Project will generate an estimated 504 Friday commuter peak hour vehicle trips. Accordingly, the Project will add only two PM peak hour vehicle trips to Route 12 (one new vehicle every half hour) and eight PM peak hour vehicle trips to Route 31 (one new vehicle every seven and one-half minutes). Since the theoretical capacity of a two-lane, two-way highway per the Highway Capacity Manual is 2800 vehicles per hour, the anticipated traffic increases will not have a perceptible impact on traffic operations. The additional Project related traffic on Route 12 and Route 31 is less than 0.1% and 0.3% of the capacity of a two-lane highway, respectively.

The "significance" of the Project related traffic increases can also be measured against state standards for determining significant impacts. Under the Massachusetts Environmental Policy Act (MEPA) the minimum level of review is the filing of an Environmental Notification Form (ENF). Filing of an ENF is only required of projects that generate at least 1000 vehicle trips per day. Projects generating fewer than 1000 vehicle trips, per the MEPA standard, are assumed to not have significant traffic impacts. Projects generating up to 3000 vehicle trips per day may also be deemed by the MEPA office to not have significant traffic impacts. The proposed Project will generate approximately 8,430 vehicle trips per day (4,215 trips each way) with the majority of traffic using I-190, Route 2 and Route 117 in the immediate vicinity of the Project. However, Route 12 in the City will see an increase of only 34 vehicles per day, a figure that is far below the MEPA review threshold of 1000 trips per day. Likewise, Route 31 in the City will see an increase of only 125 vehicle trips per day, fall far short of the MEPA definition of significant impacts. Consistent with this analysis, the MEPA certificate on the Project requires review of 12 different intersections as far away as Route 2 and 1-495 (14 miles) but does not require evaluation of Route 12 or Route 31 in the City. Considering the limited magnitude of the Project's traffic impacts with respect to the substantial capacity of the roadway system and the insignificance of the projected traffic increases when compared to MEPA review thresholds, the anticipated impact to the City's streets certainly does not meet the "significant and adverse impact" standard required by the gaming regulations.

On every measure of traffic identified in the Commission's regulations (205 CMR 125.01(2)(b)(2)), the City's Petition fails. The Project's traffic will not result in any changes in

operating level of service at any intersection in the City. (A volume increase of approximately ten percent will generally change roadway operating levels of service by a full letter grade. As noted above, project traffic will use less than one percent of the capacity of the major roadways in the City.) The increased volume of trips on the City's streets is almost unmeasurable. The small number of additional vehicles will not degrade the City's infrastructure and there are no anticipated heavy trucks or other types of vehicles servicing the Project that will use the City's infrastructure. The traffic study prepared by engineers for PPE that is the basis for these conclusions has been reviewed and endorsed by an independent peer reviewer for Leominster. The independent engineers agree that the traffic increases associated with the Project will generally be concentrated on the regional highway system with only nominal impacts on more local roads as quantified above.

Paragraphs 14 to 17 of the Petition contain broad statements of facts about the Project and the roads around the City but do not demonstrate a significant and adverse impact on the City's infrastructure. For example, PPE acknowledges that there will be approximately 8,430 vehicle trips per day generated by the Project (4,215 round trips); PPE acknowledges that the City is not directly impacted by the major roads accessing the Project (I-190); PPE acknowledges that the primary market is within 60 miles of the Project; and PPE acknowledges that there will be some traffic from New Hampshire. But nowhere in its Petition has the City provided any evidence to refute the findings of PPE's traffic study or Leominster's peer review that shows the traffic generated by the Project will not have a significant and adverse effect on the City. We note that the Project site abuts a mixed-use development anchored by a WalMart supercenter store. The MEPA documents for this mixed-use development indicates that it generates 25,040 vehicle trips per day on a Saturday, nearly three times the traffic generation of the proposed Project. Similar to PPE's project, MEPA did not consider the City an effected area for the WalMart anchored mixed-use development.

Moreover, the City notes that there is currently heavy congestion on certain roadways during peak commuting times. But again, the City identifies an existing problem that has no nexus between the Project and any impacts on the City. The Project's peak times are between 8 and 11 pm, well after any peak commuting times and, as noted above, normal Project traffic is barely measurable and will not have any significant and adverse impact on the City's roadways during peak commuting times.

The City's own numbers invalidate its claim to be a Surrounding Community. Paragraph 18 of the City's Petition notes a number of intersections that average about 22,000 vehicles per day. As noted above, the traffic study shows that there will be up to 125 cars per day generated by the Project travelling through the City on any one route. The total number of cars from the Project would approximate 0.6% of the traffic at an intersection that presently handles 22,000 vehicles per day. Again this projected impact is neither significant nor adverse.

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 " ofthe facility
10. After 7PM at nigh t 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 Vicoloid 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 (1-495) Southbound Ramps; [in Bolton]
- Route 117 and the 1-495 Northbound Ramps; [in Bolton]
- 1-495 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 Fitchburg.

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 level to another may not necessarily 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.
- Adverse impacts on transit ridership/station parking – This factor would examine the amount of transit use would result from the proposed casino and could affect bus or rail transit as well as parking at a rail station.
- 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: Fitchburg

The City of Fitchburg has submitted a petition to be designated as a “Surrounding Community” with respect to the proposed Leominster Slots Casino. 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 Fitchburg.

- 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 Fitchburg.

MassDOT comments to date have been in relation to the ENF filed by the Applicant. In that comment letter, the DOT has not mentioned any potential concern relative to State highways in the City of Fitchburg nor called for the Applicant to include any in subsequent environmental studies. One possible reason is that Route 12 in Fitchburg is not under MassDOT jurisdiction.

The MRPC did not make formal comments to MEPA as part of the ENF review process. 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 in Lancaster as well as several of the Route 2 interchanges including those in Westminster. Mentioned also were that Route 12 and Route 13 to points north to southern New Hampshire should be studied. However, there were no specific comments reflected in the meeting minutes that would indicate issues or concerns in Fitchburg. **Again, MRPC did not submit any comments to MEPA.**

Notes:

The major routes of potential concern in Fitchburg are Route 12 and Route 31 with portions under State and portions under City jurisdiction.

The City of Fitchburg 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 Fitchburg'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 does connect Leominster with Lancaster with the town border located approximately __ miles to the east. The Stantec study estimated that the casino could generate approximately 8,100 vehicle trips on a peak weekday with peak hour vehicle trips estimated to be 500 during the Friday PM commuter peak and approximately 750 vehicle trips during the Friday and Saturday anticipated peak times of the casino.

Stantec projects that 80% of the site traffic will use I-190 with 60% oriented to/from the north connecting to Route 2. Only 10% of the casino traffic is projected to travel to/from the west along Route 2. There is no clear information presented by Stantec as to how much of that would travel through the City of Fitchburg. There was no study of Route 2 or areas further east-west along Route 2 submitted thus far by the Applicant. There is some question as to the amount of site traffic forecasted to/from the west and north including Fitchburg. Based on information reviewed, it is conceivable that more than 10% of casino traffic trips could be oriented to/from this general area.

Route 12 is primary route through Fitchburg 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 between Route 2 and the downtown area during weekday peak periods as well as during portions of Saturday. A section of the roadway near Route 2 and into Fitchburg has undergone recent improvements by MassDOT, however, it remains a two lane arterial for the most part as right of way constraints exist and acquisition by the City was not accomplished. The regional planning agency has identified several high crash locations along the route north of Route 2. The Route 2/Route 12 interchange remains a concern in the region. Route 12 connects with Route 31 in the center of Fitchburg, which Route 31 continues north and provides connections to communities in southern New Hampshire. As a result of remaining a two lane arterial with a number of access drives and intersecting ways, current congestion issues will remain in the future regardless of the proposed casino.

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

- Access connection – The proposed casino site is situated approximately 9 miles to downtown Fitchburg. There is no direct route connection between the City and the casino site, however, Route 31 to Route 12 runs into Leominster and then connects with Route 117 in Downtown Leominster. One could also connect with Route 2 at Route 12, travel to I-190 and then to Route 117. In any event, while Fitchburg is proximate to Leominster, the City’s level of direct connectivity in relation to traffic and access to the casino should be considered low.
- Projected changes level of service (LOS) – There was no analysis done by the Applicant for Route 12 in Fitchburg. The southern portion of Route 12 was recently improved by MassDOT but within Fitchburg, it remains a two lane arterial. Consequently, there are times under existing conditions that congestion and motorists’ delays are experienced. If one

presumes 5% of the casino traffic would travel along Route 12, this would amount to approximately 25 vehicle trips during the PM peak hour and approximately 40 vehicle trips during the Friday/Saturday peak hours of the casino. Those locations that currently experience long delays will continue to do so with the project, however, at these levels of added traffic, there would not be a noticeable change in congestion and delays. While we believe that there is a reasonable possibility that more casino related traffic would be oriented to the west and north (including Fitchburg Route 12) than was predicted by Stantec, the likelihood of a negative change in LOS even if the estimated traffic was doubled, would be small. Again, many of the key locations presently experience low levels of service during peak periods.

- Increased traffic volumes on local streets – Based on the noted 5% estimate on Route 12 one could assume from the Stantec study, it would result in approximately 25 additional vehicle trips on the roadway during the PM peak hour and approximately 40 during the casino peak periods Friday and Saturday evenings. Compared to the current route 12 volumes, the increase in traffic on Route 12 is estimated to be approximately 1-2 % during the PM peak hour. This would typically be considered a small impact.

In view of several factors including the relatively close proximity that Fitchburg is to the site (i.e. less than 10 miles and less than 30 minute drive); its population level; 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 west and north in this region may be low. This should be further reviewed in the MEPA process since the Applicant provided limited supporting information in this analysis area.

However, if the Applicant’s projections are off by a factor of 2 for example, it would result in 20% to/from the west and north and potentially 10% site traffic finding its way to Route 12 north of Route 2. If 10% were assumed to travel through Fitchburg, that would result in 50 to 76 new vehicle trips occurring in the same three time periods noted above. These new trips would increase Route 12 peak hour volumes by approximately 2-4% depending on where one is along the corridor.

- 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. At this time the source of construction materials is not known. However, with I-190 and Route 2 nearby, it is anticipated that the longer material delivery trips would be via these two routes. In addition, construction traffic, including the facilities for construction material, would be controlled to a degree by the Applicant. Thus, the impact on Route 12 and Route 31 should be minimal. Further, major portions of these two routes have been resurfaced in the recent past and are generally designed to accommodate truck traffic. Consequently, it is not

expected that degradation of the road infrastructure of Routes 12 and 31 in Fitchburg would occur as a result of the casino construction.

- Adverse impacts on transit ridership/station parking – The Applicant did not provide any estimate as to the level of casino trips would be via transit, the Applicant has committed to working with the regional transit authority to extend service to the site and has also committed to operating a direct shuttle between the commuter rail station off Nashua Street in Leominster to the site. That said, it is our opinion that transit usage would be low and not create any problems in terms of bus loading capacity or parking problems at the rail station.
- Significant peak vehicle generation on State and Federal highways – The two State highways (but under City jurisdiction) that pass through Fitchburg and would be of potential concern include Route 12 and Route 31. Based on the Applicant’s traffic projections as well as the potential higher level of additional traffic volumes discussed above, *the proposed casino would not result in a significant peak generation on the State highway located in the City of Fitchburg.*

Concluding Opinion

The critical area that we are contending with at the moment is: ‘what defines a significant impact or change’. We do not fully concur with the arguments presented in the PPE response as MEPA’s 1,000 trip criteria for filing an ENF does not define a criteria limit of no impact vs. impact. The adding 100 vehicle trips being the general peak hour increase that would signify a likely change in operating condition is also a very general statement and would not be applied in most cases. For example, if a location was nearly at the point of changing from one level of service to a lower level, much fewer trips than 100 could trigger that change. Conversely, one could add more than 100 vehicles in the hour on a multilane roadway and it would not likely alter the level of service.

While there will undoubtedly be some casino related traffic originating from Fitchburg as well as passing through the City, it is not evident based on the combined information that has been presented, reviewed and evaluated that the facility would likely cause a significant and adverse traffic impact on the subject roadways. The surrounding community determination will need to be based on other factors including geographic proximity to the site and host community and operational concerns other than traffic.

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 – 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 Lunenberg
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 is 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

Fitchburg states that the “potential of increased traffic congestion associated with a two-year construction phase of the Project is inevitable” and that the Applicant has not shared the construction mitigation plan with the City.

The Applicant argues that Fitchburg cannot demonstrate that noise or environmental issues will have a significant and adverse impact on the City given the distance between the Project and the City. The Applicant states that it will “direct its construction team to avoid local roads and to utilize the major highways for all construction traffic.”

The ENF requires the applicant to include a construction discussion in the Draft Environmental Impact Report in order to minimize impacts.

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. At this time the source of construction materials is not known. However, with I-190 and Route 2 nearby, it is anticipated that the longer material delivery trips would be via these two routes. In addition, construction traffic, including the facilities for construction material, would be controlled to a degree by the Applicant. Thus, the impact on Route 12 and Route 31 should be minimal. Further, major portions of these two routes have been resurfaced in the recent past and are generally designed to accommodate truck traffic. Consequently, it is not expected that degradation of the road infrastructure of Routes 12 and 31 in Fitchburg would occur as a result of the casino construction.

A. COMMUNITY PETITION

D. THE CITY WILL LIKELY EXPERIENCE ADVERSE CONSTRUCTION TRAFFIC IMPACTS (205 CMR 125.01(2)(b)(3)).

20. In its RFA-2 Application, PPE identified the need for a construction mitigation plan but has not yet shared the subject plan with the City, nor has the City's input been solicited in the development of the mitigation plan.

21. For the same reasons identified under the Section C herein, the potential of increased traffic congestion associated with the two-year construction phase of the Project is inevitable.

B. APPLICANT RESPONSE

THE CITY 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 City.

All construction of the Project will occur on site. The City has not and cannot demonstrate that noise or environmental issues, if any, caused by the Project will have a significant or adverse impact on the City, especially in light of the distance between the Project and the City. Moreover, PPE will direct its construction team to avoid local roads and to utilize the major highways for all construction traffic. The only Project construction traffic that would utilize City streets is traffic going to businesses participating in the construction process - a net benefit to the City.

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.

G. OTHER

None

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

Fitchburg anticipates an increased demand for housing due to the affordable nature of its existing housing stock and notes that further inspections and timely enforcement of housing units will strain City resources. Fitchburg notes this expert studies indicate that a greater proportion of problem gamblers come from lower socio-economic strata and the incidence of addictive gambling is greater within a 10-mile radius of a gambling facility. As the City is within such a 10-mile radius and has a significant population that is at the lower end of the socio-economic strata, it states that social services provided by the City will be strained beyond capacity.

Fitchburg also notes that it is likely to experience a significant increase in mutual aid requests from Leominster for fire and EMT services.

The Applicant responds that there is significant vacant housing stock in Leominster and that the City of Leominster's peer review indicated that the Applicant's commitment to local hiring should have no adverse impact on the local housing stock throughout the region. The Applicant states that the Project will not create any significant need for new housing in the City in response to the concern about additional inspections personnel. Further, the Leominster Police and Fire Departments issued letters stating that they do not expect any mutual aid assistance from the City. Further, it notes that Leominster will build a police substation in the Facility, in addition to State Police presence and Gaming Commission presence. Finally, in regard to the concern about problem gamblers, the Applicant argues that significant expenditures in excess of \$15 million per year will be utilized to address problem gambling.

The ENF stated that the City of Leominster has adequate water capacity and sewer capacity for the Project.

The Montachusett Regional Planning Commission noted the significant number of foreclosed and distressed properties, and doubling up in housing in Fitchburg and stated that the host community and surrounding communities should use this new job generating facility as an opportunity to connect employees with available homes reversing disinvestment and stimulating reinvestment in neighborhoods throughout the Montachusett Region thus stabilizing neighborhoods.

Mark Vander Linden commented on existing research related to the connections to problem gambling and lower socio-economic strata an proximity to a gaming facility. He concluded that:

“Problem gambling rates and proximity to gaming availability: Many studies have found a relationship between proximity to gambling venues and the prevalence of problem gambling. In 1998, analysis of the U.S. Gambling Impact and Behavior Study data found that location of a casino within 50 miles was associated with approximately double the rate of pathological gambling (Gerstein et al., 1999).”

“Socioeconomic inequality: There is a small body of research that explores whether gambling acts as a form of regressive taxation, where poorer people contribute disproportionately more to gambling revenue than people with higher incomes . A total of 22 studies have examined this issue, with all but two finding that gambling was indeed economically regressive. Although it is clear that lower income people contribute proportionally more of their income to gambling than do middle and high income groups, it is important to recognize that in most of these studies average annual expenditure on gambling still tends to increase as a function of income class. Thus, total gambling revenue is still primarily contributed by middle and higher income groups.”

“Burden on social Services: It seems logical to conclude that the increase in persons with gambling disorders would create a burden on the City’s social service agencies. However, as pointed out by Dr. Williams, the bulk of the impacts tend to be social/nonmonetary in nature because only the minority of problem gamblers seek or receive treatment, and only a minority typically have police/child welfare/employment involvement. That being said, it is difficult to accurately predict the actual impact as ultimately it will vary between jurisdictions depending on the type of gambling introduced and the magnitude of the change. For example, a new casino in a small community with limited prior exposure to gambling has a much larger impact than if the casino was introduce in

a large city that already had easy access to gambling options to a range of gambling options.”

“Dr. Robert Williams, a Principal Investigator on the SEIGMA team, conducted an exhaustive review of research that focused on the social and economic impacts of gambling in a study prepared for the Canadian Consortium for Gambling Research. He concluded that the overall impact of gambling in a particular jurisdiction in a specific time period ranges from small to large, and from strongly positive to strongly negative. That being said, in most jurisdictions, in most time periods, the impacts of gambling are mixed, with a range of mild positive economic impacts offset by a range of mild to moderate negative social impacts.”

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

Lynn D. Sweet Consulting Group noted:

“We find that it cannot be determined from the submitted materials and our independent evaluation that the City of Fitchburg will be significantly and adversely affected by the operation of the gaming establishment after its opening due to housing impacts resulting from the facility. In fact, the additional jobs should add to the employment base of Fitchburg and may also address issues of a declining population and vacancy. Based on the unemployment rate, the housing vacancy rate, and the skill level of most jobs that the Slots Parlor will create, it is safe to conclude that very few of the 500-700 new jobs will be filled by personnel moving to the area. In fact most jobs will be filled by persons who live in the area and therefore already have housing.”

“It is noted in Section 23 of the Fitchburg petition that the current housing affordable stock is reported to be somewhat distressed and this statement includes Fitchburg Housing Authority units and concerns over being able to provide adequate inspectional services. The Fitchburg Housing Authority is now under an extensive review and a fiscal audit that was ordered by the state in 2012 for “severely neglected and misused properties, lengthy waiting lists, an unacceptable

vacancy rate and a lack of management over site”. Therefore, their situation appears to be separate and unique from the City’s Inspectional Services Department. In addition, the City of Fitchburg is a Community Development Block Grant entitlement community and therefore receives federal funding on a yearly basis for a variety of services including home repair and code enforcement. According to the “Year 39 CDBG Action Plan” revised 5/30/2013, among other funds, they have allocated \$65,000 for an elderly home repair program and \$180,000 for Board of Health Code Enforcement. With the current number of units just completed and in development in the City, it appears that the City Inspectional Services department does have the capacity to monitor housing conditions in its general housing stock.”

“Therefore, given the likelihood that the majority of workers will be from the immediate area and the City appears to be keeping up with inspecting the general housing stock, we conclude that the City of Fitchburg will not be significantly and adversely affected by the operation of the gaming establishment after its opening due to housing impacts resulting from the facility.”

“Social Service Organizations: Given that both Fitchburg and Leominster are Gateway Cities, they have developed an extensive network of organizations to serve residents’ needs. Furthermore, we note that the Host Community Agreement sets forth the creation of a Leominster Community Foundation which will receive \$50,000 yearly. A portion of these funds could be used to support social service organizations which address needs in both cities. We have noted a number of the many social service and housing organizations on Table 6 below:”

A. COMMUNITY PETITION

B. THE CITY'S POPULATION IS VIRTUALLY IDENTICAL TO THAT OF THE HOST COMMUNITY AND, IN CERTAIN CATEGORIES, THE CITY FACES MORE SEVERE SOCIO-ECONOMIC CHALLENGES (M.G.L. c. 23K, §§4(33) and 17(a); 205 CMR 125.01(2)(b)).

7. The City is the third largest city in Worcester County, Massachusetts.

8. Like the Host Community, the City has been designated a "Gateway City" pursuant to M.G.L. c. 23A, §3A. To be designated as such under the statute, the community must have a -population between 35,000 and 250,000, with an average household income below the state average and an average educational attainment rate also below the state average. With the exception of the Springfield metro area, the City and Host Community are the only Gateway Cities that are connected at their border. See Exhibit 5 attached hereto and incorporated herein for complete demographic data for each the City and Host Community prepared by the Massachusetts Housing Partnership.

9. The City's and Host Community's population are virtually the same: 40,898 people reside in Fitchburg and 40,411 are residents of Leominster. See Id.

10. The City, however, has a poverty rate at least double that of the Host Community, at 19.4%. Further, 16.5% of City residents receive food stamps or SNAP benefits. See Id.

11. The City's median household income is \$47,101, far short of the Commonwealth's average of \$64,081 and \$9,161 per household less than the Host Community average income of \$56,262. See Id.

12. The median age of City residents is 34.7 years, while that of the Host Community is 40 years. See Id.

13. Only 13.5% of the City's residents possess a bachelor's degree- significantly fewer than the 17.9% of Host Community residents with a similar degree. See Id.

E. CITY PUBLIC SAFETY, HOUSING AND SOCIAL SERVICE NEEDS WILL BE ADVERSELY IMPACTED UPON OPENING OF THE PROJECT (205 CMR 125.01(2)(b)(4))

22. The City and Host Community deliver emergency response, police and fire protection to each other pursuant to mutual aid agreements; see Exhibit 7 attached hereto and incorporated herein. An increase in the provision of such services in the Host Community and in neighboring communities, as a result of calls made to the Project, will place strains on the City's ability to

provide timely services to its citizens. Unlike some of the neighboring communities, the City's fire department and the Host Community Fire department are completely staffed by full-time firefighters and EMTs and therefore it is more likely that mutual aid request from the Host Community would first be answered by the City's fire and rescue apparatus.

23. As acknowledged by PPE in its RFA-2 Application, the City anticipates an increased demand for housing due to the affordable nature of its existing housing stock, including those units which the joint City and Host Community Housing Authority, described in Paragraph 6, makes available. According to the City's Housing Director, there are currently 2,673 private market multi-family dwellings, with 8,910 apartment-units, within the City. The ability to inspect such units and coordinate compliance with Commonwealth and City sanitary and building codes is dependent upon adequate City staffing levels to timely conduct these public safety duties. The City's current building and code staffing levels are well below the municipal standards for inspectors per 10,000 residents and with the potential increase of occupied housing units due to the project, further inspections and timely enforcement to ensure public safety and health will be strained throughout the City.

24. The City houses many of the social agencies that serve the northern portion of Worcester County, notably including the Montachusett Opportunity Council ("MOC") which has identified Project impact needs such as employment/workforce training, youth employment and financial education. Expert studies have demonstrated that a greater proportion of problem gamblers come from the lower socio-economic strata and the incidence of addictive gambling is greater within a 10-mile radius of a gambling facility. Moreover, expert studies reveal that frequent and problem gambling become more common as socio-economic status decreases. As noted, the City is clearly within a 10-mile radius of the proposed slot parlor and has a significant population that is at the lower end of the socio-economic strata and hence it is logical that social services provided by the City will be further strained beyond capacity.

B. APPLICANT RESPONSE

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

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

The City asserts that since the City and Leominster are commonly known as Sister Cities or Twin Cities that justifies being declared a Surrounding Community. Similarly the City asserts that since the two cities' housing authorities pool their demographic information for federal reporting requirements and grant applications and because they share a Management Services Agreement, there is a justification to be a Surrounding Community. While these circumstances provide an interesting yet tangential tie of commonality between Leominster and the City, the Petition provides no facts or other information to tie these connections to the Project.

The Live! Casino Impact Assessment prepared by B&S Consulting for Leominster reviewed the housing stock and likely impact on housing in Leominster. The report noted that most of the Project's jobs can be filled by people who already live in Leominster or the surrounding area and that there is significant vacant housing stock in Leominster. PPE has committed to hire from the local region and therefore the additional employees should have no adverse impact on the local housing stock throughout the region, including the City. Typically, there is a very positive impact in local and regional economies from more local residents having jobs and added buying power. Considering the distance between the City and the Project and the availability of housing in Leominster, there is no evidence that there will be a measurable, much less a significant and adverse, impact on the housing stock in the City.

The City states that its current staffing levels for enforcing building and other codes are well below municipal standards. As demonstrated above, the Project should not create any significant need for new housing in the City. In fact, the Project's operations will help address the current staffing deficiency with additional tax dollars from well-paid residents working at the Project; from new tax revenues at other amenities that the Project intends to cross market with, including Great Wolf Lodge; and from revenue generated by businesses in the City that will provide goods and services to the Project.

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 City's assertions in paragraph 22 of 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.

In addition, the Project will place no burden on any utility infrastructure of the City such as water, sewer, electrical and gas services. These utilities will be provided directly by Leominster and private providers. Furthermore, PPE will be improving the existing storm water and drainage in the Project's area.

Finally, as to the suggestion in Paragraph 24 of the City's Petition that problem gaming will impact the City's social services, Section 56 and Section 59-2(k) of the Expanded Gaming Act provides for certain fees from the casinos, as well as 5% of gaming tax receipts to be deposited into a Public Health Trust Fund to be used for addressing this important issue. The Commission has stated it intends to spend in excess of \$15 million per year, approximately 30% of total existing national expenditures, to address problem gaming in the Commonwealth. Therefore, it is not anticipated that the cost associated with problem gaming will become the burden of local jurisdictions, nor is there evidence that given the amount of gaming currently available in the region, and the limited size of the Category 2 facility, that the Project is anticipated to create any significant number of new problem gaming cases. If anything, the amount of new resources that will be available in the Commonwealth should help address not only new issues, but assist those existing cases of Commonwealth residents suffering from addictions.

We empathize greatly with the City's current problems of unemployment, crime and demand for social services. However, these are pre-existing conditions that have no causal relationship to the Project. We note the paradox in the Petition that the City cites its high unemployment rate and demand for jobs, yet then raises concern that people might actually want to live in the City.

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

MARK VANDER LINDEN

On October 31 the Commission received a surrounding community petition from the City of Fitchburg, MA (“City”). In their Statement of Reasons they cite numerous ways they will be impacted should PPE Casino Resorts MA, LLC (PPE) locate a gaming facility in Leominster, MA. Below, in italics, I provide a summary of research (Williams, Rehm, Stevens,2011) in response to select social and economic reasons, that may provide some assistance as the Commission considers the petition.

“City public safety, housing and social service needs will be adversely impacted upon opening of the project.” (24) Expert studies have demonstrated that a greater proportion of problem gamblers come from the lower socio-economic strata and the incidence of addictive gambling is greater within a 10-mile radius of a gaming facility. Moreover, expert studies reveal that frequent and problem gambling become more common as socio-economic status decreases. As noted, the City is clearly within a 10-mile radius of the proposed slot parlor and has a significant population that is at the lower end of the socio-economic strata and hence it is logical that the social services provided by the City will be further strained beyond capacity.”

Problem gambling rates and proximity to gaming availability: *Many studies have found a relationship between proximity to gambling venues and the prevalence of problem gambling²*

- *In 1998, analysis of the U.S. Gambling Impact and Behavior Study data found that location of a casino within 50 miles was associated with approximately double the rate of pathological gambling (Gerstein et al., 1999).*
- *In a separate U.S. national-level study, Welte et al. (2004) determined that the location of a casino within 10 miles of an individual’s home is independently associated with a 90% increase in the odds of being a problem or pathological gambler.*
- *Shaffer, LaBrie and LaPlante (2004) examined county-level prevalence estimates from the 2000/2001 survey in Nevada in relation to casino availability and found that the four counties with the greatest access to casinos had the highest problem gambling rates, and the four with the least availability had the lowest rates.*

² Williams, R.J., Volberg, R.A. & Stevens, R.M.G. (2012). *The Population Prevalence of Problem Gambling: Methodological Influences, Standardized Rates, Jurisdictional Differences, and Worldwide Trends*. Report prepared for the Ontario Problem Gambling Research Centre and the Ontario Ministry of Health and Long Term Care. May 8, 2012. <http://hdl.handle.net/10133/3068>

Socioeconomic inequality: *There is a small body of research that explores whether gambling acts as a form of regressive taxation, where poorer people contribute disproportionately more to gambling revenue than people with higher incomes³. A total of 22 studies have examined this issue, with all but two finding that gambling was indeed economically regressive. Although it is clear that lower income people contribute proportionally more of their income to gambling than do middle and high income groups, it is important to recognize that in most of these studies average annual expenditure on gambling still tends to increase as a function of income class. Thus, total gambling revenue is still primarily contributed by middle and higher income groups.*

Burden on social Services: *It seems logical to conclude that the increase in persons with gambling disorders would create a burden on the City's social service agencies. However, as pointed out by Dr. Williams, the bulk of the impacts tend to be social/nonmonetary in nature because only the minority of problem gamblers seek or receive treatment, and only a minority typically have police/child welfare/employment involvement. That being said, it is difficult to accurately predict the actual impact as ultimately it will vary between jurisdictions depending on the type of gambling introduced and the magnitude of the change. For example, a new casino in a small community with limited prior exposure to gambling has a much larger impact than if the casino was introduced in a large city that already had easy access to gambling options to a range of gambling options.*

Dr. Robert Williams, a Principal Investigator on the SEIGMA team, conducted an exhaustive review of research that focused on the social and economic impacts of gambling in a study prepared for the Canadian Consortium for Gambling Research. He concluded that the overall impact of gambling in a particular jurisdiction in a specific time period ranges from small to large, and from strongly positive to strongly negative. ***That being said, in most jurisdictions, in most time periods, the impacts of gambling are mixed, with a range of mild positive economic impacts offset by a range of mild to moderate negative social impacts.***

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

³ Williams, R.J., Rehm, J., & Stevens, R.M.G. (2011). *The Social and Economic Impacts of Gambling*. Final Report prepared for the Canadian Consortium for Gambling Research. March 11, 2011.

LYNN D. SWEET CONSULTING GROUP

This letter is in connection with the proposed Category 2 gaming facility with 1,250 slots in Leominster, MA (the “Subject Property”) and the City of Fitchburg petition to the Mass Gaming Commission on October 30, 2012 to be designated as a Surrounding Community. You have asked us to take a brief look at concerns expressed by the City of Fitchburg with respect to potential housing impacts.

Methodology

We have received the Host Community Agreement, the portion of the gaming legislation related to Surrounding Communities, City of Fitchburg Petition and summary of proposed jobs for the Subject Property. We have also contacted industry experts. We ran Census ACS reports and Esri reports and performed internet research. We also performed internet research to identify social services organizations in Leominster and Fitchburg.

Conclusion

We find that it cannot be determined from the submitted materials and our independent evaluation that the City of Fitchburg will be significantly and adversely affected by the operation of the gaming establishment after its opening due to housing impacts resulting from the facility. In fact, the additional jobs should add to the employment base of Fitchburg and may also address issues of a declining population and vacancy. Based on the unemployment rate, the housing vacancy rate, and the skill level of most jobs that the Slots Parlor will create, it is safe to conclude that very few of the 500-700 new jobs will be filled by personnel moving to the area. In fact most jobs will be filled by persons who live in the area and therefore already have housing.

Research

Based on the information provided by the Applicant and HLT (MGC’s technical reviewer), it is our understanding that but for the “pre-opening team” from the applicant to get the operation and training started, most workers will be drawn from the local area. Industry experts engaged by the MGC (HLT) have indicated that travel time and distance to work is dependent on housing choices and travel conditions. They also state that In House-training includes substantial regulatory training for problem gaming, ethics, etc. There will be some expansion to the local economy unrelated to the proposed gaming facility due to the growth of Fitchburg University and the expansion of the commuter rail.

The Host Community Agreement states that there will be 500-700 jobs created by the new Slots Parlor.

Table 1 below shows the population growth for Fitchburg as compared to Leominster and Massachusetts over time. It shows that Fitchburg lost over 5% of its population form 1990-2000 and regained 3% from 2000-2010.

Table 1

	1990	2000	Change 1990- 2000	2010	Change 2000- 2010
Fitchburg	41,194	39,098	-5.1%	40,318	3.1%
Leominster	38,145	41,297	8.3%	40,759	-1.3%
Massachusetts	6,016,425	6,349,097	5.5%	6,547,629	3.1%

Table 2 below shows the Household Growth for Fitchburg as compared to Leominster and Massachusetts over time. It shows that Fitchburg’s household growth rate is somewhat lagging as compared to Leominster and Massachusetts.

Table 2

	2000	2010	Change 2000-2010	% Change 2000-2010	2017
Fitchburg	14,942	15,165	223	1.5%	15,649
Leominster	16,489	16,767	278	1.7%	16,343
Massachusetts	2,443,580	2,547,075	103,495	4.2%	2,637,121

Table 3 below compares unemployment rates over the past 11 years. It shows that Fitchburg’s unemployment rate is significantly higher than the Massachusetts state average and is somewhat higher than Leominster.

Table 3

UNEMPLOYMENT RATES - PAST 10 YEARS					
Period	Year	Fitchbur g	Leominste r	Massachusett s	United States
August	2013	10	9.6	6.8	7.3
Jan-Dec	2012	10	8.8	6.7	8.1
Jan-Dec	2011	11	9.6	7.3	8.9
Jan-Dec	2010	11.7	10.7	8.3	9.6
Jan-Dec	2009	11.1	10.2	8.2	9.3
Jan-Dec	2008	7.3	6.5	5.3	5.8
Jan-Dec	2007	6.4	5.5	4.5	4.6
Jan-Dec	2006	6.8	5.7	4.8	4.6
Jan-Dec	2005	7	5.9	4.8	5.1
Jan-Dec	2004	7.1	6.4	5.2	5.5
Jan-Dec	2003	7.9	6.9	5.8	6

Table 4 below shows the number of persons in the labor force, and the number of persons employed. For the past two years there have been over 1,800 persons unemployed in Fitchburg. Therefore, the additional jobs being added as a result of the Subject Property will be beneficial to the local economy.

Table 4

Fitchburg			
Year	Month	Labor Force	Employed
2013	August	18,264	16,435
2012	Annual	18,465	16,614
2011	Annual	18,684	16,626
2010	Annual	18,837	16,637
2009	Annual	19,162	17,031
2008	Annual	18,581	17,220
2007	Annual	18,454	17,279
2006	Annual	18,557	17,299
2005	Annual	18,443	17,149
2004	Annual	18,598	17,281
2003	Annual	18,892	17,408

Table 5 compares housing vacancy rates and illustrates that Fitchburg has 2,647 vacant units and a higher vacancy rate than Leominster. According to the 2012 ACS, the majority of vacancies are rental units. Therefore, there are housing units that could be absorbed in the event workers do move to the area to work at the Subject Property.

Table 5

Housing Occupancy & Vacancy						
	Fitchburg		Leominster		Massachusetts	
	Number	Percent	Number	Percent	Number	Percent
Total housing units	17,327		17,994		2,809,746	
Occupied housing units	14,680	84.72%	16,870	93.75%	2,524,028	89.83%
Vacant Units	2,647	15.28%	1,124	6.25%	285,718	10.17%

New and Planned Housing Developments

In Fitchburg, there are several new apartment developments that have recently opened and several in the pipeline that we have noted below. In addition, with regard to homeownership development there are number of unfinished condominium developments that have stalled so if the homeownership market picks up there are more permitted units ready to come on line.

- **Riverside Commons, 245 River Street (Old mill/box factory)**
When complete: 170 units.

Project: Two phased 40R Smart Growth rental units; 1st wing is open, 2nd wing in progress. The will be 25% of units affordable at 80% AMI (43 units) and the remainder (127 units) will be market rate

Developer: M.D.P

- **470 Main Street**

Project: 30 units, 70%-80% market rate and remainder affordable

Developer: Twin Cities CDC

- **Fitchburg Place, 16 Pritchard Street**

Project: Former Groop Towers, previously owned by Fitchburg Housing Authority.

Redeveloped in 2012: 88 subsidized elderly rental units. Currently at full occupancy.

Developer: Winn

- **Private Student Housing near Fitchburg State**

- 75 Day Street

Project: 40 Suites

- Simons Hall, 45 North Street

Project: 70 Suites

- **Fitchburg Commons-Mixed Use/ Market Rate, North & Main (Downtown)**

Project: 62 units, 1st floor retail

Developer: Ted Carmen, Concord Square Development

It is noted in Section 23 of the Fitchburg petition that the current housing affordable stock is reported to be somewhat distressed and this statement includes Fitchburg Housing Authority units and concerns over being able to provide adequate inspectional services. The Fitchburg Housing Authority is now under an extensive review and a fiscal audit that was ordered by the state in 2012 for “severely neglected and misused properties, lengthy waiting lists, an unacceptable vacancy rate and a lack of management over site”. Therefore, their situation appears to be separate and unique from the City’s Inspectional Services Department. In addition, the City of Fitchburg is a Community Development Block Grant entitlement community and therefore receives federal funding on a yearly basis for a variety of services including home repair and code enforcement. According to the “Year 39 CDBG Action Plan” revised 5/30/2013, among other funds, they have allocated \$65,000 for an elderly home repair program and \$180,000 for Board of Health Code Enforcement. With the current number of units just completed and in development in the City, it appears that the City Inspectional Services department does have the capacity to monitor housing conditions in its general housing stock.

Therefore, given the likelihood that the majority of workers will be from the immediate area and the City appears to be keeping up with inspecting the general housing stock, we conclude that the

City of Fitchburg will not be significantly and adversely affected by the operation of the gaming establishment after its opening due to housing impacts resulting from the facility.

Social Service Organizations:

Given that both Fitchburg and Leominster are Gateway Cities, they have developed an extensive network of organizations to serve residents’ needs. Furthermore, we note that the Host Community Agreement sets forth the creation of a Leominster Community Foundation which will receive \$50,000 yearly. A portion of these funds could be used to support social service organizations which address needs in both cities. We have noted a number of the many social service and housing organizations on Table 6 below:

Table 6

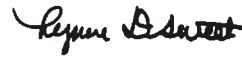
Name	Community	Area of Specialty
Children's Aid & Family Service, Seven Hills	Fitchburg	Family care, services and counseling
Cleghorn Community Center	Fitchburg	Family services, food pantry and assistance
Community Resources for Justice	Fitchburg	Supportive services for ex-offenders
Fitchburg Community Connections Coalition	Fitchburg	Service agency partnership
Fitchburg Housing Authority	Fitchburg	Subsidized housing
Habit Opco	Fitchburg	Substance abuse and mental health treatment
Horizons for Homeless Children	Fitchburg	Homeless children
Institute of Professional Practice	Fitchburg	Disability services
Key Program, Inc	Fitchburg	Youth supportive services
Life Skills, Inc	Fitchburg	Disability services
Luk, Inc.	Fitchburg	Substance abuse and mental health treatment
Mass Dept of Transitional Assistance	Fitchburg	Public assistance
Mass Rehabilitation Commission	Fitchburg	Disability services
Matson Community Services/ The Arc	Fitchburg	Disability services
Montachusett Opportunity Council	Fitchburg	Emergency housing and community services
North Center Wic Program	Fitchburg	Family and nutrition services
Our Father's House, Inc.	Fitchburg	Homelessness
Safeplan	Fitchburg	Domestic abuse prevention and treatment
Work, Inc.	Fitchburg	Disability services
Twin Cities CDC	Fitchburg	Housing and homeownership
Veterans Homestead	Fitchburg	Veterans Hospice
Beacon of Hope	Leominster	Disability services
Community Healthlink	Leominster	Substance abuse, mental health and homelessness treatment

Name	Community	Area of Specialty
Hero Homestead	Leominster	Homeless Veterans
Leominster Housing Authority	Leominster	Subsidized housing
Mass Dept of Children & Families	Leominster	Family welfare services
Montachusett addiction Council	Leominster	Drug addiction treatment
Spanish American Center	Leominster	Supportive services for multicultural population

We would be pleased to answer any questions you have in this regard.

Thank you for your time and attention.

Sincerely,
LDS Consulting Group, LLC



By: _____
Lynne D. Sweet, Managing Member

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

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 with 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

19 MR. DEVEREAUX: Good morning, Mr.
 20 Chairman, members of the Commission. My name
 21 is William Devereaux. I have addressed the
 22 Commission previously. To my right is John
 23 Barrett, the city solicitor for Fitchburg. And
 24 to his right is Matthew Feher who has also
 1 assisted me in this matter.
 2 I'm not going to regurgitate the
 3 memorandum that we gave to the Commission. I
 4 think we had adequately address the factors
 5 that are laid out in the statute as to why
 6 Fitchburg is a surrounding community. I would
 7 submit that it is not only a case that's been
 8 made, but it's a logical conclusion that
 9 Fitchburg is a surrounding community to
 10 Leominster and where the proposed gaming
 11 facility is going to be.
 12 I did read Cordish's memo that
 13 apparently was sent to you a day and a half
 14 ago. I am still trying to understand some of
 15 the logic of it. Basically, I do want to
 16 dispel a couple of notions. One is that we
 17 refuse to negotiate with Cordish. That is just
 18 not accurate. The Mayor did sit with
 19 representatives of Cordish and basically their
 20 position was that they are bringing nothing but
 21 good things. And that the town of Fitchburg
 22 should take what they offer.
 23 I note that in their memo they
 24 indicate that we shouldn't hold it against them
 1 that they have already made community
 2 agreements with I would submit other towns that
 3 have a compelling case that they are
 4 surrounding communities but not as compelling a
 5 case as Fitchburg. They don't want you to, I
 6 think the words were, use that against them.
 7 We're not here to create an
 8 adversarial situation at this point. But
 9 frankly, it is a task of admission that those
 10 are surrounding communities recognized by
 11 Cordish. And you can't be a surrounding
 12 community if you've agreed to essentially take

13 what they've offered but not be a surrounding
 14 community if you haven't.
 15 In essence, on the one hand we are
 16 not a surrounding community as I read their
 17 memo because various factors that they've
 18 cited, which I submit really don't hold water.
 19 But then we are a surrounding community because
 20 we are going to get all of these benefits. And
 21 I would submit to you that we're not here to
 22 say that convenience gaming is a bad thing.
 23 It's an entertainment venue. People have an
 24 absolute right, adults have a right to choose
 1 whether to patronize it or not.
 2 But there are going to be some
 3 negative consequences to it, despite the fact
 4 that Cordish doesn't seem to want to
 5 acknowledge that. And those negative
 6 consequences have to be weighed by this
 7 Commission.
 8 And I would submit to you that
 9 that's the reason we have the disbursement
 10 fund. To say that we haven't rebutted their
 11 traffic experts that we haven't obviously had a
 12 chance to examine. We don't even know what the
 13 foundation of their data is. To say that we
 14 haven't rebutted some of the other assertions,
 15 frankly, puts the cart before the horse.
 16 If we are a surrounding community
 17 and we get a disbursement, we can get
 18 independent experts that can address those
 19 concerns and bring to you intelligent
 20 information that you can weigh. I can tell you
 21 that Fitchburg hopes, the door is always open,
 22 if we can have meaningful discussions with
 23 Cordish and reach an agreement, we would like
 24 to do that.
 1 But in the meantime, we're going to
 2 protect the city's interests. And I do hope
 3 the Commission will protect the city's interest
 4 by finding that it is a surrounding community.
 5 And then we'll go through the process. We will
 6 get information to present to the Commission.

7 If we have to go through the arbitration
8 process, we would be prepared to do that. I
9 don't have anything further, unless the

10 Commission has some questions.

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. DEVEREAUX: Good evening,
 16 Mr Chairman, members of the Commission. My
 17 name is William Devereaux. I'm here
 18 representing the city of Fitchburg. I sort
 19 of come at this from a unique perspective,
 20 I guess, because I represented entities on
 21 both sides of this issue. I represented
 22 the Narragansett Indians and the Harrah's
 23 Casino, when they sold a casino.
 24 Represented the city of -- city of Fall
 1 River when it was looking at a potential
 2 casino.
 3 One thing that, on behalf of
 4 Fitchburg I want to thank the Commission
 5 for, is the focus on mitigation to
 6 surrounding communities. And as was
 7 already stated by a number of witnesses,
 8 Fitchburg is also a gateway community, and
 9 Fitchburg is definitely going to be
 10 affected, hopefully in positive ways, but I
 11 think we also have to be realistic that
 12 there are going to be some negative aspects
 13 to a gambling venue, and those have to be
 14 addressed.
 15 And Fitchburg has a concern about
 16 that because, presently, the dialogue with
 17 Cordish, and we've heard very good things
 18 about Cordish, and frankly it seems that
 19 they are a good company. But their
 20 dialogue with the city of Fitchburg has not
 21 exactly been overwhelming. We would ask
 22 the Commission to monitor how Cordish deals
 23 with the surrounding communities, because
 24 so far -- and we hope that there's some

1 progress, but there really hasn't been much
 2 progress to report to you in terms of
 3 Fitchburg's discussions with the Cordish
 4 company. And that makes me focus on just a
 5 couple of points.
 6 The Act -- the Massachusetts Gaming
 7 Act is different than many other states.
 8 In that, within the law there has to be a
 9 concern in agreements, mitigation
 10 agreements with surrounding communities.
 11 Massachusetts, like many New England
 12 states, has a very strong, local community
 13 government. There's 351 cities and towns.
 14 So yes -- and there's probably
 15 people in Leominster that are related, have
 16 family members in Fitchburg and vice-versa,
 17 and it's good to have economic development.
 18 But how to you address some of the negative
 19 concerns? That is a significant issue for
 20 the city of Fitchburg.
 21 One thing I would like to mention
 22 too is, what you're talking about here is a
 23 convenience gaming facility. That's a
 24 totally different animal from a resort
 1 casino. So you have to be realistic about
 2 what -- what the pluses are going to be and
 3 what some of the negatives are going to be.
 4 The plus is the economic
 5 development. But the negatives are,
 6 whether there's 10 cars going at one hour
 7 or a hundred cars, there's going to be wear
 8 on the roadways, because convenience
 9 casinos are the types of facilities where
 10 people go only for several hours, and they

11 either eat, drink, gamble and they leave.
12 So there's a lot of in and out traffic that
13 happens at a facility like that, and you
14 have to be concerned about that.
15 The other thing that Fitchburg is
16 concerned with, and we've looked at some
17 studies, problem gambling, while's it's not
18 an epidemic, it is significant enough that
19 you have to be concerned about that. And
20 in the surrounding communities there's
21 studies that show within a 10-mile radius,
22 the people that are in the lower
23 socioeconomic strata are the ones that are
24 adversely affected to a greater degree.
1 And if you look at Fitchburg, Fitchburg has
2 a 19-percent poverty rate, and it has an
3 unemployment rate that's a bit greater than
4 Leominster. So those are significant
5 concerns for the city of Fitchburg.
6 I know that Cordish says there's
7 going to be a lot of economic energy and
8 redistribution. But, frankly, most of that
9 in the public sector goes either to the
10 state or Leominster. There has to be some
11 significant address that's made to the
12 surrounding communities to make this
13 project really work. Everyone talks about
14 team work. Well, Cordish has got to get on
15 the bus, too, and recognize that there's
16 other communities that are involved here.
17 In terms of Fitchburg being a
18 surrounding community, which is the last
19 thing I'm going to address, I would ask you
20 to consider -- I think it's not only
21 legally correct, but I think it's common
22 sense that Fitchburg is, under the
23 definition of the statute, a surrounding
24 community. It's contiguous. It's border
1 runs along the same common border with
2 Leominster. The population is almost
3 identical, the demographics are very
4 similar. In fact, as I mentioned, the
5 poverty rate is higher in Fitchburg than it
6 is in Leominster, and there's going to be
7 an increase in traffic.
8 Now one thing that I did, to do a
9 little due diligence, the only facility of
10 this type that you can look at that would

11 be similar is in Lincoln, Rhode Island, and
12 that's Twin River, which has been, what
13 they call the racino for over 20 years.
14 So I called the CEO and asked him
15 about the positives and the negatives.
16 And, certainly, his town gets a significant
17 amount of money from that casino. But he
18 did tell me, it's not so much police.
19 There will be extra police calls. But it's
20 your fire and your rescue. In one year he
21 said he had 800 calls, rescue calls to the
22 facility. And that could be from slip and
23 falls to suspected heart attacks, you name
24 it, and they have to respond.
1 Now, some people will say, well,
2 that's Leominster's issue. Well, no, it
3 isn't, because you have mutual aid
4 agreements with all the surrounding towns.
5 So if there is a rescue, for instance, in
6 Leominster that's making another call,
7 somebody from Fitchburg or Lancaster's
8 going to have to respond to that. So
9 there's going to be a ripple effect based
10 on mutual aid agreements.
11 Lastly, there's got to be some
12 positive way to address, whether it's with
13 the Fitchburg State or other entities that
14 are already straying, I mean, the public
15 health aspect is significant. What are you
16 going to do about the problem gambling,
17 because that is going to happen? Because
18 people from -- I submit, you're not going
19 to get people flying in on planes to go to
20 this casino. You'll get people from around
21 here, but the people flying in aren't
22 coming here. They're going to go to either
23 Mohegan Sun or wherever they build in
24 Boston. They're going to go to the resort
1 casinos where they can stay overnight and
2 they can spend a few days. You're going to
3 get convenience gamblers here, and there is
4 an affect. You're not going to get the
5 heavy tourist dollar. You will get some
6 dollars, but you are going to get that
7 negative effect.
8 The city of Fitchburg is very
9 concerned about that and is asking this
10 Commission to consider that and watch how,

11 if any, dialogue develops with The Cordish
12 Companies. Thank you.

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.

MR. MCNUTT: Thank you,
21 Commissioners, for this opportunity. My
22 name is Ryan McNutt. I'm the director of
23 housing for the city of Fitchburg. I also

24 lived in the city of Fitchburg. I'd like
1 to reiterate and echo some of the comments
2 that were made by Mr. Devereaux, who was
3 representing the city of the Fitchburg.
4 This -- obviously, having six to 800
5 jobs come into our region is going to be a
6 benefit for Leominster, Fitchburg, all of
7 the surrounding communities. I mean, it's
8 something that every economic professional
9 has fought for, is to get jobs into your
10 community. So I mean, we're definitely
11 very eager to see the impacts in the
12 positive sense of having this many jobs
13 come into our community.
14 But I've seen the comments from The
15 Cordish Companies and their executives in
16 the newspapers, and they are pretty loudly
17 stating that they don't believe that
18 there's going to be any negative impacts in
19 any of the surrounding communities. And as
20 the economic development and housing
21 professional for the city of Fitchburg,
22 that really gives me a lot of pause for
23 concern, because a large part of my job
24 deals with a lot of social services aspects
1 of Fitchburg in terms of affordable housing
2 and lower wage -- you know, individuals
3 that are making, you know, 60 percent of
4 varying median income, or 40 percent of
5 varying median income. Some people make 30
6 percent of varying median income.
7 What I suspect is many of these 600
8 jobs are going to be folks that are going
9 to make 40 to 60 percent of varying median
10 income. And Fitchburg is a very affordable
11 and attractive community, because the rents
12 are very low and it is so affordable.
13 So, I mean, we're a similar size
14 community from Leominster. They have about
15 40,000 people, we have 40,000 thousand
16 people. We share a lots of resources being
17 both gateway cities, contiguous gateway
18 cities. We also share federal entitlement
19 grants. I manage the CDBG and the home
20 programs for the city of Fitchburg, which
21 is a participating jurisdiction with the
22 city of Leominster. So I see in my job
23 every day, the bleed-off effects, both

24 positive and negative, that go back and
 1 forth between the cities of Fitchburg and
 2 Leominster. That's why they're known as
 3 little twin cities.
 4 So, again, I just want to, you know,
 5 share my enthusiasm for the positive
 6 impacts this -- this project may have for
 7 our region, but I also urge the
 8 Massachusetts Gaming Commission to pay very
 9 close attention to the executives of
 10 Cordish Companies and what there saying,
 11 and how they don't believe there's going to
 12 be any adverse effects on the neighboring
 13 communities. I mean, that, to me, just
 14 seems a little too yellow brick road, and
 15 not enough of the actual conditions of our
 16 roads, you know.
 17 I mean, there is some common sense
 18 about what happens when you build one of
 19 these convenience gaming resorts in a
 20 community. And the impacts can be very
 21 positive, but over the life of this project
 22 there's going to be adverse societal
 23 effects as well, and Fitchburg will
 24 definitely experience those. Thank you

MS. FARIAS: Hi. Thank you for
 14 joining us today and hearing all sides of
 15 the argument for the casino, or the slots
 16 parlor coming into Leominster.
 17 My name is Suzanne Farias. I am
 18 current chair of the Johnny Appleseed Trail
 19 Association, our RTC in the area. And I am
 20 also general manager at The Double Tree by
 21 Hilton in Leominster, so I'm wearing two
 22 different hats today.
 23 I am a 24-year veteran of the
 24 hospitality industry in this area. And
 1 during that tenure, I have actually seen
 2 companies come and go. Okay. We've had
 3 General Electric in Fitchburg, we've had
 4 Nova Corporation, we've had the Army base
 5 close in Devens, only to have
 6 MassDevelopment put in all of the
 7 development into the Devens area touting
 8 that they were going to find new businesses
 9 to come into our region. And really what

10 they did is, they stole our businesses from
 11 Leominster and Fitchburg, which has
 12 exacerbated our the unemployment problem in
 13 the area. That's unfortunate, because it
 14 would be nice if we were good stewards and
 15 we could work together to make this area
 16 great.

17 On the flip side, the slots does
 18 propose to bring in jobs, but it also
 19 brings in revenue that is desperately
 20 needed in this area. The social services,
 21 that income in this area that can then
 22 reach out to the people, who are in need in
 23 our area, will have a grave impact from
 24 this development.

1 The residual effect alone on
 2 tourism, okay, our goal as far as in RTC is
 3 to get people to get off the highway, stop,
 4 see what we have in our area. And we've
 5 accomplished that through the Johnny
 6 Appleseed Trail Association in the tourism
 7 center on Route 2. People go through once,
 8 but when they stop, okay, to go to the
 9 bathroom or stretch their legs, at least
 10 we're making a statement that there's more
 11 to our area than they're -- they're just
 12 driving through. So we've given them an
 13 opportunity to come and stop at another
 14 time.

15 With the development of Great Wolf
 16 Resorts in Fitchburg, and now the potential
 17 slots, okay, we're giving them more reason
 18 to stop and get off the highway. And
 19 believe it or not, that is going to have a
 20 residual effect. People are going to be
 21 using the other services in this area.
 22 Being in the hospitality industry, I
 23 have seen people who have those, quote,
 24 minimum wage jobs. Some of minimum wage
 1 workers make more than our managers in the
 2 tipped environment, first of all. Second
 3 of all, they don't spend it where they
 4 work. So if you think all these people are
 5 going to go and get jobs working in the
 6 slots and then go back and spend it trying
 7 to make their fortune, that's not the case.
 8 What it is going to do is, it's going to
 9 take unemployed people, give them a sense

10 of accomplishment, and it's going to have
 11 them have expendable cash to then use
 12 within our area.
 13 You know, I don't relish the fact
 14 that all of you have to make this decision.
 15 That you're seeing diverse sides from both
 16 sides of the argument. But, quite frankly,
 17 I think this project has a huge benefit to
 18 our area. More so than if it were placed
 19 in another area throughout the state.
 20 That's it.

MR. BARRETT: City solicitor for the
 17 city of Fitchburg. First, I'd like to
 18 thank you, Mr. Chairman, and Commissioners
 19 for coming out to our area. The city of
 20 Fitchburg, you know, feels that if this
 21 will be a good thing for the area, it's to
 22 be welcomed, but we have reservations. We
 23 have concerns, because we feel that the
 24 secondary affects that seem to have been
 1 addressed in the Expanded Gaming Act are
 2 not being addressed by the proponent.
 3 Namely, the surrounding community
 4 agreements.
 5 We're -- it's now October 21st. We
 6 still -- and thankfully you folks did
 7 extend the time for negotiating the
 8 surrounding community agreements to
 9 October 31st, but I sadly have to report we
 10 have not made much progress in trying to
 11 come to some agreement with Cordish.
 12 I'm not going to try to review,
 13 because I think you've already had
 14 two-and-a-half hours of the debate, the pro
 15 and con of the benefits or the negative
 16 effects. I think you folks are probably
 17 more familiar with many of those than most
 18 of us here are.
 19 But one of the concerns I have is a
 20 -- is sort of organic disconnect that I
 21 think The Cordish Companies are having with
 22 respect to their experience in Maryland and
 23 what their proposal is here in north
 24 Worcester County.
 1 My understanding that in Maryland
 2 their operation is basically countywide.

3 In Maryland it's a county operation. My
 4 understanding of Anne Arundel County has a
 5 population of about 500,000. I'm sorry I
 6 don't know what the size of it is but I --
 7 geographically, but I suspect it's at least
 8 as large as north central Massachusetts or
 9 maybe even as large as Worcester County,
 10 since counties here in Massachusetts are
 11 much smaller.
 12 But their approach there is
 13 countywide. Here it's individual city.
 14 But the gaming -- Expanded Gaming Act
 15 recognized that, I think by recognizing
 16 that there should be surrounding community
 17 agreements. And to date -- now, to date,
 18 it was reported that proposals have been
 19 sent out to all of the eight surrounding
 20 communities. I'm not sure if the gentleman
 21 knew, but to date Fitchburg has not
 22 received a proposed agreement.
 23 We had some discussions and we made
 24 a proposal that was not, you know,
 1 well-received by Cordish. We're still
 2 willing to meet. They have proposed that
 3 we go down to Maryland to see their
 4 operations there. It's not an issue with
 5 respect to how good a facility that they
 6 operate and how nice it is. It's more --
 7 our concern is -- has to do with the
 8 secondary effects.
 9 As been mentioned previously before,
 10 Fitchburg has a very high percentage of its
 11 population that's low income. We have
 12 concerns about our housing situation.
 13 Traffic, while it may not be as -- as
 14 dramatic as the traffic affect on Lancaster
 15 or Sterling, we expect there will be
 16 residual traffic issues as well, given the
 17 close connection that Fitchburg and
 18 Leominster has.
 19 If you ever tried to commute from
 20 Fitchburg to Leominster on Route 12, South
 21 Street, Merriam Street during rush hour,
 22 you'll know what it could be like. So the
 23 people are not only going to be coming down
 24 Route 2 and Route 190, they're going to be
 1 coming down Route 31 and Route 12 through
 2 Fitchburg to go to this facility.

3 So I know it's been a long afternoon
4 for you. I don't want to prolong it. But
5 that's -- the main point I'd like to leave
6 with is the fact that the Act does
7 recognize the fact that there are going to
8 be consequences to the surrounding
9 communities. And I, quite frankly, would
10 ask Cordish to take another look at what
11 they're doing with respect to dealing with
12 the concerns of the surrounding
13 communities. Thank you.

MR. ROSA: Thank you very much for
19 inviting me here this afternoon and
20 allowing me to speak. I know we heard a
21 lot about the reasons that Leominster wants
22 the slots license, so I'm going to be brief
23 and I'm going to try to put a different
24 spin on this.
1 I worked with The Cordish Company --
2 Companies and around the Cordish people for
3 about six weeks before I came to my
4 conclusion. One of the things I saw was
5 honesty. That they would hire local
6 people. Not just from Leominster, but give
7 preference to hiring local people in
8 Leominster. We have an unemployment rate
9 around 9.5 percent. We are a gateway city,
10 as you know. We have less bachelor's
11 degrees or higher than the average in the
12 state, and our income level is lower than
13 the average in the state.
14 So the first thing I saw when they
15 hired people, they hired local people,
16 Leominster people, and they also made a
17 commitment to hire veterans. And that's
18 very important to me because I'm a Vietnam
19 veteran and I know what veterans go
20 through. I'm on the Veterans' and Federal
21 Affairs Committee in Boston. I see how
22 many veterans are unemployed. And this
23 company has made a promise to the city of
24 Leominster, to the state, and to myself
1 personally, to hire veterans and people
2 with disabilities. That's important too.
3 So that was my first criteria.
4 The second criteria is education. I

5 know this sounds out of -- not normal, but
6 you wouldn't think that a slots parlor is
7 going to have to educate people, but they
8 are. This is a whole new workforce. We
9 don't have anybody trained in our area to
10 work in a gambling atmosphere or a casino.
11 So I arranged meetings with the
12 powers to be at Fitchburg State, and I
13 actually sat in on some of those meetings
14 with the managing partner, Joe Weinberg.
15 And he made a commitment to Fitchburg State
16 University that they would help set up a
17 program where they could bring people in to
18 train them.
19 He also met with President Asquino
20 of Mount Wachusett Community College.
21 That's a place I graduated from 40 years
22 ago and got me my start in life. And
23 that's important to the people that aren't
24 going to earn four-year degrees. And even
1 if you don't have a degree, they're going
2 to set up educational programs. So that
3 was my second criteria, hiring of people,
4 local people, surrounding community people
5 and education.
6 Now, the third thing that I looked
7 at, obviously, that, if this program was
8 good, if I was going to endorse it, it
9 would have to be great for Leominster. It
10 has to be, not good, it has to be great.
11 And I think this program's going to be
12 great. But because I'm a business owner,
13 small business owner, I'm worried about all
14 the rest of the communities around me.
15 This is my own personal thoughts,
16 these are my personal thoughts and
17 opinions, that this may be something that
18 you don't know. In one of the communities
19 around us, Fitchburg, for example, is
20 another gateway city, has the same
21 conditions as Leominster. That's two major
22 cities that could be affected by this
23 proposal. They also have a unemployment
24 rate of, I think, 10-plus, or at least in
1 the high nines. They have a huge workforce
2 looking for work. They have an abnormally
3 high amount of veterans like the city of
4 Leominster, and they have a disabled

5 population.
 6 So you can affect a hundred --
 7 almost 100,000 people in two communities,
 8 two of the gateway cities out of 26 in
 9 Massachusetts. This would -- this has
 10 never been done before, where we could
 11 affect two gateway cities.
 12 Now, I did business in Fitchburg for
 13 28 years. I was successful in Fitchburg.
 14 I recently sold my property, but I hold the
 15 mortgage, and I want Fitchburg to be
 16 successful. This is going to bring
 17 business, not only to Leominster, but a
 18 huge amount of business, I think, to
 19 Fitchburg that have their own regional
 20 airport. They're also having a major
 21 development with the Wolf Company,
 22 Wolf Lodges.
 23 So I think this could be a mini
 24 vacation destination for two or three days
 1 where you can even bring your kids, have
 2 fund all day and then have some adult
 3 entertainment at night. And together,
 4 collectively, we have -- with Worcester we
 5 have almost three, 400,000 people in the
 6 central Massachusetts location. That's not
 7 going to cannibalize --
 8 CHAIRMAN CROSBY: You're setting --
 9 MR. ROSA: -- anybody --

MR. MCKEEHAN: Mr. Chairman and
 11 members of the Commission, welcome to
 12 Lancaster and north central Massachusetts.
 13 We're very pleased that you're out here.
 14 I'm David McKeehan, the president of
 15 the North Central Mass. Chamber of Commerce
 16 representing. We're an organization with a
 17 1,000-member firms representing about
 18 30,000 employees in the Fitchburg,
 19 Leominster and surrounding communities.
 20 It's -- and I'm here today because the
 21 Chamber enthusiastically endorses this
 22 proposal by the Cordish company. We polled
 23 our members and there's strong support.
 24 This is -- this is clearly an
 1 important economic development project in
 2 this area that it has two gateway cities.

3 And as you've already heard, I'm the third
 4 speaker and you've heard it three times
 5 already, but the -- one of the highest
 6 unemployment rates in the Commonwealth.
 7 Certainly, this project is -- is an
 8 important one to us. It's going to have a
 9 tremendous spinoff effect on regional
 10 businesses during both the construction and
 11 the operation. And the preferences that
 12 Cordish has committed themselves to that
 13 you've heard from Representative Rosa is
 14 really important in terms of hiring, and
 15 also their preferences for local businesses
 16 and cooperating regional tourism marketing
 17 and cross-marketing with regional
 18 retailers, restaurants, hotels and
 19 attractions.
 20 Given the projected location of the
 21 three Category 1 casinos that we're reading
 22 about, Cordish's Massachusetts Live!
 23 location is a strategic choice, we think,
 24 for the Commonwealth. This location really
 1 maximizes revenue because of its central
 2 location, proximity to New Hampshire, and
 3 it will certainly eliminate, if not
 4 eliminate, mitigate the cannibalization
 5 that has already been mentioned from having
 6 casinos overlapping marketplaces that -- of
 7 those resort casinos that are going to be
 8 built.
 9 The Cordish Companies have acted
 10 responsibly with their -- in their dealings
 11 with the community so far, and we look
 12 forward to them being an excellent
 13 corporate citizen going forward.
 14 The important example is the venture
 15 that their application talks about in
 16 funding one-and-a-half million dollars a
 17 year to move new -- to move new medical
 18 device companies from patent to production
 19 and create thousands of additional
 20 high-tech jobs in this marketplace. This
 21 is -- this is really important because this
 22 region actually has one out of every three
 23 private sector payroll dollars comes from
 24 manufacturing here. We have the highest
 1 concentration in the state.
 2 So what -- what this casino

3 represents for us, with this added
4 enhancement that they have added for
5 economic development, is a diversification
6 of our employment base, but also a
7 reinforcement of the existing base that is
8 so important to our communities. Thank you
9 very much, and we hope that you'll come
10 back and -- with a positive message.

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. DAVID: I currently live in
5 Gardner, Massachusetts, and I am an
6 employee of The Arc of Opportunity in
7 Fitchburg, Mass. I've grown up the
8 majority of my life in Fitchburg. I
9 graduated from Fitchburg High. And I'm
10 just -- throughout time I've realized the
11 opportunities that would be available if
12 such a company were to establish here in
13 Leominster.
14 Every day I'm assigned with --
15 assigned with the assessment and
16 professional training of people I serve
17 through the Department of Developmental
18 Services and Mass. Rehabilitation
19 Commission. The men and women we place in
20 employment range from janitors at community
21 centers (phonetically) -- centers to
22 packaging specialist at manufacturing
23 facilities, to baggers at your local
24 supermarket, to dish cleaners at local
1 restaurants.
2 When I hear about the potential for
3 a new business to start up within the
4 community, immediately I think of the
5 possibilities. Possibilities for the
6 people we work for, the possibility of
7 jobs. A job brings someone a sense
8 purpose. It can provide variations of
9 prosperity, ranging from feelings of
10 self-worth to monetary stability, and even
11 new friendships within the community.
12 A variety of opportunities would
13 arise if such an establishment were to be
14 developed in the central location within
15 Massachusetts. Grant it -- it would grant
16 people the opportunity for such
17 prosperities. These prosperities are not
18 just limited to the individual, but can

19 stretch into the quadrant regarding other
20 small, local businesses. A new form of
21 entertainment can bring increased revenue
22 into the regional community, new supply
23 chains.
24 Such an economic expansion would
1 implement greater opportunities for local
2 business, developing further avenues for
3 employment for all individuals within the
4 surrounding towns. Thank you for your
5 time, and just remember the possibilities
6 for this region. Thank you.

MR. LEGER: Dave Leger, Leominster
11 resident. I -- business manager, Laborer's
12 Union, Local 39. I represent the
13 Leominster DPW and 400 construction workers
14 in the Fitchburg area.
15 Our area, we cover from Orange to
16 Lancaster. We don't have any major cities
17 in our area. We don't a Worcester, we
18 don't have a Boston, we don't have a
19 Lowell. So any construction jobs we get,
20 they're hard to come by. The only think we
21 have really down is Fort Devens, in which a
22 lot of those jobs all went north to New
23 Hampshire, at Fort Devens. They really
24 didn't treat us good over there.
I know Leominster, the Cordish group
2 will do the right thing when it comes to
3 building a place, and for the Leominster
4 DPW, they definitely, definitely, can use
5 some new equipment. And with the revenue,
6 hopefully, they can buy some of those
7 sanders and plowers that are getting very
8 old. Thank 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 City from the Project 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 City's residents at the Project and the purchasing and cross marketing opportunities for the City's businesses with the Project are positive impacts for the City.

PPE has received the endorsement of local and regional chambers of commerce, businesses, performing arts venues and attractions and has entered into agreements with those organizations to participate in regional marketing and cross-marketing programs. This is a strong message from the business community that the Project is anticipated to be a strong economic engine for the entire region. 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. As opposed to an adverse impact as suggested in Paragraph 24 of the City's Petition, these programs, particularly with Fitchburg State University, should significantly improve employment training, youth employment and financial education in the City.

PPE has also entered into a partnership with the University of Massachusetts Medical Device Development Center 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 City. 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

Attached

- Traffic Impact Study