

# MASSACHUSETTS GAMING COMMISSION SURROUNDING COMMUNITY PETITION ANALYSIS



**COMMUNITY:**  
**APPLICANT:**

**TOWN OF BRIDGEWATER**  
**RAYNHAM PARK LLC**

11/20/2013

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## INTRODUCTION AND OVERVIEW

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

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

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

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

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

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

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# 1. PROXIMITY

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## Legal Framework

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

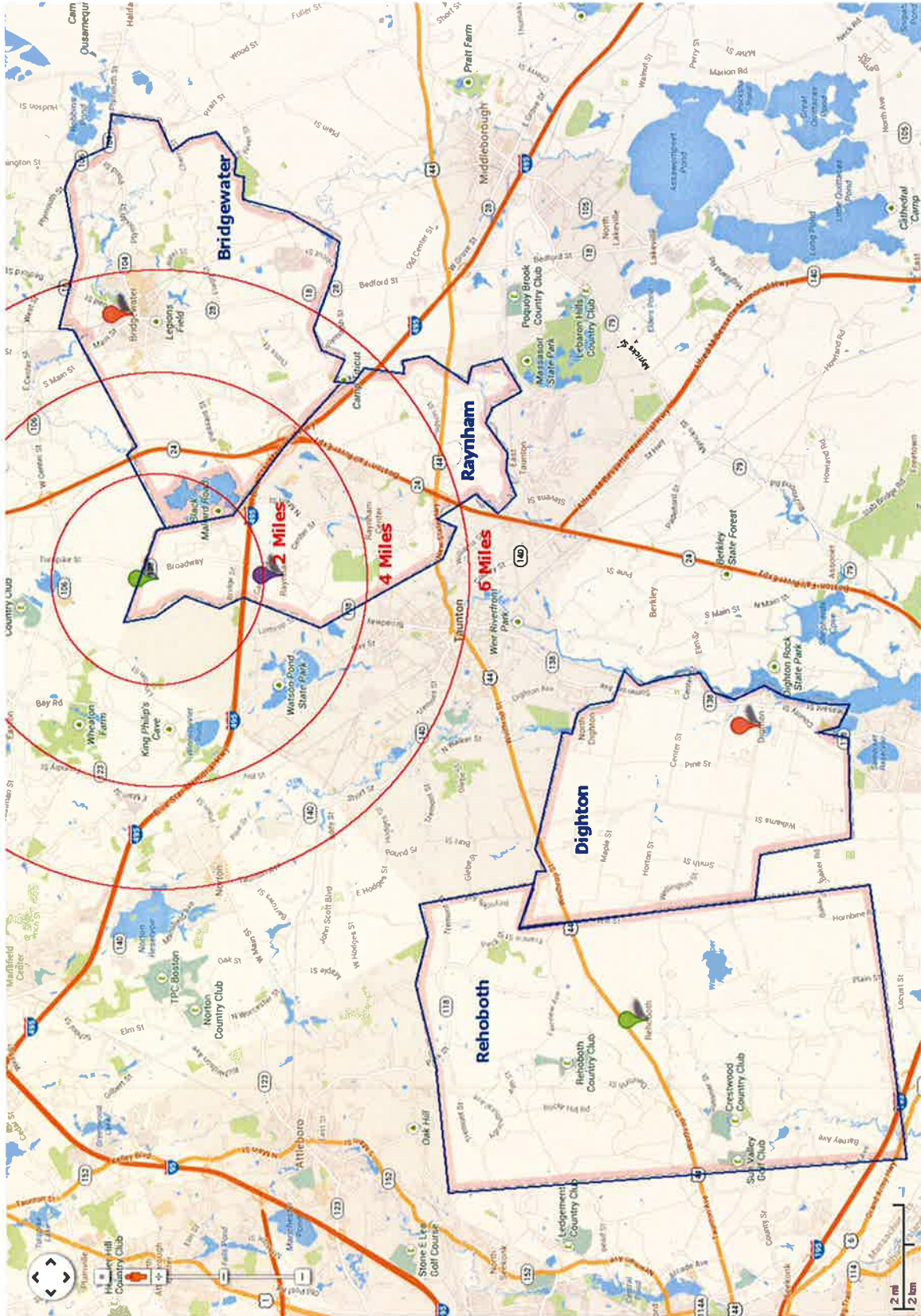
Bridgewater states that “[o]ther than the City of Taunton, Bridgewater and Raynham share a border far greater than any other town.” The Applicant’s Nearby Communities Impact Report states that the proposed facility is approximately 1 mile from Bridgewater’s town line (two miles by road) and approximately 4.2 miles to the Municipal Center.

Google Maps provides an estimate commuting distance of 7.9 miles and 17 minutes between the site of the proposed facility and Bridgewater town hall, using Routes 138, 106, and 28.

During the Commission’s deliberation on surrounding communities policies, the Commission rejected establishing a mileage based threshold for determining which communities are surrounding communities. But noted that the legislature had offered amendments on such a mileage based standard (establishing a standard of 2 miles, 3 miles or 5 miles distance from a gaming facility as determination of surrounding community status or the need for a hearing.)<sup>11</sup>

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<sup>11</sup> See “surrounding communities amendment” document included in December 12, 2012 Commission Meeting Packet.



## **A. COMMUNITY PETITION**

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Other than the City of Taunton, Bridgewater and Raynham share a border far greater than any other town. We share sensitive ecological resources. We share responsibility for emergency response to heavily travelled Route 24 and Interstate 495. We also host Route 104, which is a major east-west connection from the south coast to the Raynham area. And we share a regional school district.

## **B. APPLICANT RESPONSE**

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None

## **C. RPA ANALYSIS**

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None

## **D. ENF ANALYSIS**

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None

## **E. CONSULTANT ANALYSIS**

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None

## **F. APPLICATION**

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None

## **G. OTHER**

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### **NITSCH ENGINEERING REPORT**

#### **Summary of Findings - Proximity**

The Site is located in the northern portion of Raynham approximately 0.1 miles from the Easton town line, and is also within one (1) mile of Bridgewater, West Bridgewater, and Taunton. The following points summarize the results of the Proximity impact analysis:

- The Site is located approximately 0.1 mile from the Taunton City Line along Route 138.

- The Site is located approximately one (1) mile from Bridgewater Town Line as the crow flies, but over two (2) miles by road (Route 138 to Route 106) through Easton.
- The Site is located approximately one (1) mile from the West Bridgewater town line as the crow flies. There are many routes from the Site to West Bridgewater, however there are no direct roadway connections.
- The closest residential neighborhood outside of Raynham is located on Prospect Hill Street in Taunton. Prospect Hill Street is a dead-end street off of Bridge Street and Elm Street, which are accessed from Route 138 in Raynham). The neighborhood is isolated by Route 495 and is separated from the Site by the railroad right-of-way that runs along the western boundary of the Site. The Project does not include any work west of the railroad right-of-way.
- The closest residential homes and businesses in Easton are located approximately one (1) mile north of the Site on Route 138, which is separated from the Site by the Hockomock Swamp.
- The Hockomock Swamp Area of Critical Environmental Concern (ACEC) runs along the northern portion of the Site. The Hockomock Swamp ACEC is located in Raynham, Bridgewater, West Bridgewater, Easton, Taunton, and Norton.

#### Summary of Proposed Mitigation – Proximity

The following actions are proposed to mitigate the potential proximity impacts to the nearby communities:

- Due to its rural location, the selection of the existing developed Site for the proposed Raynham Park Casino Project avoids substantial impacts to nearby communities through proximity. The Site is isolated by Route 495 and Raynham to the south, the Hockomock Swamp to the north and east, residential neighborhoods to the southeast located within Raynham, and the railroad right-of-way to the west.
- Due to the Site's proximity to the ACEC, the Project will provide more than the required stormwater mitigation under the Massachusetts Department of Environmental Protection (MassDEP) Stormwater Standards. The Project will reduce the amount of impervious area and will provide a substantial improvement in the water quality of stormwater runoff discharging to the ACEC.

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## 2. INFRASTRUCTURE

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### Legal Framework

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

### Executive Summary

The Town of Bridgewater claims that the “developer’s study fails to identify any destination traffic coming from the south or east through Bridgewater, yet it is self evident that the applicant’s project will generate at least some traffic from the south coast area....We question the thoroughness of a study that fails to account for any traffic coming from a population of roughly 175,000 year-round residents. Of particular concern to Bridgewater is an intersection at Route 104 and Elm Street East.” Additionally, the Town indicates a concern that Bridgewater will experience greater strain on its first responders to incidents on Routes 24 and Routes 495. Further, Bridgewater notes that 60 % of its mutual aid calls are generated from Raynham. In Bridgewater’s testimony before the Commission, Bridgewater stated “an increase in traffic on Routes 24 and 495 as the applicant concedes will generate additional emergency calls for Bridgewater as the first responder. Since 2006, our fire department has responded to almost 500 calls on Routes 24 and 495. Since 2006, our police department has responded to over 300 calls to the most westerly part of Route 104. Since 2006, our fire department has responded to almost 100 calls for mutual aid to Raynham with whom we have a mutual aid agreement. An increase in traffic to and from the applicant’s proposed facility will require additional resources from the town of Bridgewater.”

The Applicant states that both its Nearby Communities Impact Report and its Traffic Impact Study conclude that Bridgewater is not likely to experience impact from the construction or operation of the Raynham Park gaming establishment. The Applicant’s Nearby Communities Impact Report concludes that “[u]se of minor local roadways to access the Site is anticipated to be minimal.”

The Commission contracted with the Old Colony Planning Council to conduct an analysis of impacts likely to be experienced by nearby communities. In its analysis, the OCPC stated that “[t]he Traffic Impact Study highlights the fact that the proposed project is sandwiched between Interstate 495 and Route 24 and claims that 70% of the trips generated by the proposed project

will use those limited access highways. Although a large amount of the traffic is expected to utilize Interstate 495 and Route 24, the local road network will still be a viable option for patrons and employees and therefore should be included in the expanded study area. Specifically, the study area should analyze traffic impacts ... on Route 104 in Bridgewater....” The OCPC also noted that the Applicant’s Nearby Communities Impact Report “does not take into account potential public safety impacts that may be experienced by surrounding communities as a result of the Project....The responsibility of responding to these traffic related issues will be addressed by the community in which the issue occurs.”

The Environmental Notification Form Certificate (ENF) for the Project did not include any recommendation to study intersections in Bridgewater.

Green International finds that:

“The Nitsch traffic study examined locations essentially along Route 138 in Raynham north of Route I-495. 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 Bridgewater.”

“Comment letters and memoranda prepared by MassDOT and the two area regional planning agencies: Old Colony Planning Council (OCPC) and the Southeastern Region Planning & Economic Development District (SRPEDD) were reviewed to obtain any potential insights or concerns related to the proposed casino and the impact on Bridgewater.”

“MassDOT comments to date have been in relation to the ENF filed by the Applicant. In that comment letter, the DOT comments focused on Route 24, Route 106 as well as the Applicant’s forecasts methods. DOT did not mentioned any potential concern relative to Route 104 in the Town of Bridgewater nor called for the Applicant to include any in subsequent environmental studies. One possible reason is that Route 104 west of Bridgewater center is not under MassDOT jurisdiction with the exception of the area of the Route 24 interchange.”

“In contrast to MassDOT, both regional planning agencies: Old Colony Planning Council (OCPC) and the Southeastern Regional Planning and Economic Development District (SERPEDD) have commented to MEPA that the Applicant’s study has not adequately evaluated a broad enough area including the Route 104 corridor in Bridgewater. Both have called for it to be included in subsequent MEPA analyses.”



“As part of the Green analysis, information contained in the Nitsch traffic study as well as other information such as the Market Analysis included in the RP application were reviewed for relevant information. Additionally, data and reports available through MassDOT and the regional planning agencies were reviewed to obtain additional information to help address the factors. Prior to the review of the factors with respect to Bridgewater’s petition, a brief summary of information relative to the proposed Raynham casino is provided.”

“The proposed slots casino in Raynham is to be located off Route 138 on the site of the former Greyhound Racing site. The site is currently active with Simulcast activity as well as other unrelated activities (i.e. trash hauling business) occurring. Route 138 is a State owned and maintained in this area two lane highway. North of the site is Route 106 in Easton. The Route 106 intersection with Route 138 is currently signalized and id planned for some improvements by the MassDOT. Route 106 connects Easton with West Bridgewater to the east. Route 106 also intersects with Route 24 approximately 1.3 miles from Route 138. Approximately 1.5 miles south of the site is the Route138 interchange with I-495. Elm Street intersects Route 138 approximately 1.3 mile south of the site and the intersection is controlled by a traffic signal.”

“The Nitsch study estimates that the proposed casino project will result in a total traffic generation of approximately 7,500 over the course of the day with a net new number of trips being approximately 5,850. The Nitsch study estimates total site weekday PM peak trips to be 1,123 vehicle trips with a net new number of trips during the PM peak hour of approximately 960. They did not complete an analysis of Saturday conditions when one expects the casino to be at its peak level of activity. It should be noted that MassDOT has raised questions related to the trip forecasting methods and results. Our review of casino trip making in general as well as compared to the other proposals currently under review also would suggest that the casino project related trip generation might be stated low in the Nitsch study.”

“The town of Bridgewater is located to the east of Raynham and is a bordering community. Elm Street that is located south of the project site on Route 138 provides a connection to Route 104 in Bridgewater. Route 104 is a State numbered route that passes through Bridgewater and later intersects with Route 106 in East Bridgewater where that route continues to the east providing access to communities such as Halifax, Plympton and Kingston. Within Bridgewater, Route 104 connects in the town center where it intersects with Routes 18 and 28 – two routes that provide connections to Middleborough and Lakeville. Route 104, which comes under town jurisdiction west of the Town center, intersects with Route 24 as well. Based on data from the Old Colony Planning Council, Elm

Street east of Route 138 in Raynham carries approximately 4,200 vehicles per day while Route 104 just west of the Route 24 interchange was observed to have a daily volume of approximately 9,800 vehicles. One pattern that has been noted in past studies is that a relatively large movement of motorists travel between the I-495/Route 138 interchange and the Elm Street-Route 104 section avoiding the Route 104/Route 24 interchange to I-495 movement.”

“The Nitsch study notwithstanding being limited in study area and questions pertaining to trip forecasting, projected approximately 5% of the casino traffic to use Elm Street to and from the east. Our review of the analysis and information provided by the Applicant as well as information from the regional planning agencies would suggest that this movement may be between 5% and 8%. Based on these percentages and presuming the Nitsch forecasts are reasonable correct in terms of total site traffic, results in daily and weekday PM peak hour estimates of added traffic on Elm Street and Route 104 in Bridgewater of approximately 375 to 600 over the day and 55 to 90 during the PM peak hour. Again, the Applicant did not provide an analysis of peak Saturday conditions but based on our assessment, the Saturday peak hour added volumes to Elm Street due to the casino could exceed 100 vehicles.”

“The relative traffic increases in Elm Street east of Route 138 and on Route 104 between Elm Street and the Route 24 interchange were calculated based on the potential added trips to the streets. This results in an estimated daily increase of between 8 and 14% on the Elm Street section and a 4% to 6% increase on the Route 104 section. The weekday PM peak hour increases would be between 10% to 17% on Elm Street and 6% to 10% on the subject Route 104 section. At these levels, the increases could be noticeable and may result in changes in operating conditions at key locations, particularly unsignalized intersections.”

“Access connection – The proposed casino site is situated approximately 9 miles to Bridgewater Center. The route between the Town Center and the proposed casino site would be via Route 104 to Elm Street to Route 138, which could be considered fairly direct if not exactly.”

“Projected changes level of service (LOS) – There was no analysis done for Route 104 in Bridgewater by the Applicant. Between the Town’s center and Elm Street, Route 104 is a two lane arterial that provides access to commercial properties, office parks and residential land uses. As discussed above, the casino development could result in between 55 and 90 vehicle trips added to Route 104 during the weekday PM peak hour. There was no analysis completed for this corridor by the Applicant so the current operating levels are not fully known. However, analysis provided by the OCPC shows that the Route 104 intersection

with Elm Street is currently operating poorly (LOS 'F') while the signals at the Route 24 interchange ramps are operating at LOS 'D' or better. An increase by 90 vehicles trips could potentially alter the levels of service although the Route 24 ramp intersections would continue operating at acceptable levels but the motorist delays at the unsignalized intersection of Route 104 with Elm Street could be significantly increased. Again, there was no peak Saturday analysis completed by the Applicant making it difficult to assess this factor."

"Increased traffic volumes on local streets – Based on the above, it is estimated that PM peak hour increases on Elm Street to range from 10% to 17% during the weekday PM peak hour while Route 104 increases would range from 6% to 10%. Daily traffic increases would be generally similar. These levels of increase would likely be noticeable and would be considered moderately high."

"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 it is not known where specifically materials would be obtained from, however, with I-495, nearby with a direct connection to Route 138 and relatively short distance between I-495 and the site, it is anticipated that most longer haul trips would be via these two routes. In addition, construction traffic including the facility that materials are procured from would be controlled to a degree by the Applicant. Thus, the heavy vehicle traffic impact and consequently, road infrastructure impact on Route 104 should be minimal."

"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. There is currently no local public transit that operates along Route 138 to serve the site. There is a commuter rail station in Bridgewater with some parking. The Applicant has not proposed nor committed to encouraging transit use or providing such things as shuttles between the site and transit stations. Based on the suburban location of the proposed casino site, we would expect minimal use of public transit. Consequently, at this time, we do not believe that there would be any significant adverse impacts on transit ridership or station parking as a result of the proposed casino."

"Significant peak vehicle generation on State and Federal highways – The State highway that passes through Bridgewater and would be of potential concern is Route 104. As indicated, the estimated weekday PM peak trip generation related to casino trips would be between 55 and 90 vehicle trips. While Saturday peak analysis was not completed, we would estimate site trips potentially added to Route 104 during this time to be greater than 100 vehicle trips. These levels of

added trips to the two lane Route 104 highway would likely be noticeable and could be considered significant.”

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

## **A. COMMUNITY PETITION**

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Traffic. The developer's study fails to identify any destination traffic coming from the south or east through Bridgewater, yet it is self evident that the applicant's project will generate at least some traffic from the south coast area. We question the thoroughness of a study that fails to account for any traffic coming from a population of roughly 175,000 year-round residents. Of particular concern to Bridgewater is an intersection at Route 104 and Elm Street East. If subject to significant additional traffic, we will need funding to make improvements (see Old Colony Planning Council Memorandum, October 23, 2013, Section 2.1 Transportation, attached).

Additionally, Bridgewater is a first responder to Routes 24 and 495 in the areas that pass through the town. An increase in traffic, as the applicant's projections suggest, will place greater burden on both Bridgewater's Police and Fire Departments. Furthermore, currently 60% of our mutual aid emergency medical and fire calls are generated from Raynham. Additional traffic generated at high-crash points such as highway on and off ramps in any part of Raynham will directly negatively impact Bridgewater.

## **B. APPLICANT RESPONSE**

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First, as part of its Phase 2 Application, Raynham Park submitted a Nearby Communities Impact Report and a Raynham Slots Casino Traffic Impact Study, both prepared by Nitsch Engineering, and both of which conclude that the Community is not likely to experience impact from the construction or operation of the Raynham Park gaming establishment.

Second, the local Regional Planning Agency ("RPA"), the Old Colony Planning Council (OCPC), issued a Report on October 23, 2013, which is attached hereto, which also contains no finding of significant impact to the Community by the construction or operation of the Raynham Park facility.

## C. RPA ANALYSIS

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### OLD COLONY PLANNING COUNCIL

The Traffic Impact Study conducted by Nitsch Engineering (ENF filing) included existing and future traffic, safety, and operational conditions analyses of Route 138 and its intersections including and between Route 106 in Easton and Interstate 495 in Raynham. According to the study, the proposed project is expected to be built in three Phases over a period of 7 years; however, the final phase (Phase 4), which includes the addition of the proposed South Coast Rail Commuter Rail station, was not included in the future analysis due to the uncertainty of the project. Access and egress to the site would be via the three existing curb cuts on Route 138 and the project is expected to generate 7,541 net new vehicle trips on an average weekday.

In order to offset the traffic impacts related to the proposed project, the project proponent has committed to the following mitigation measures:

- Timing changes to the Foundry Street (Route 106) & Turnpike Street (Route 138) intersection project (Mass DOT #606071)
- Installing a fully actuated traffic signal at the Main entrance
- Widening of Route 138 in front of site
- Creation of a Transportation Demand Management Program

The Traffic Impact Study highlights the fact that the proposed project is sandwiched between Interstate 495 and Route 24 and claims that 70% of the trips generated by the proposed project will use those limited access highways. Although a large amount of the traffic is expected to utilize Interstate 495 and Route 24, the local road network will still be a viable option for patrons and employees and therefore should be included in an expanded study area. Specifically, the study area should analyze traffic impacts on Route 106 in Easton and West Bridgewater; on Route 104 in Bridgewater; and Route 138 in Easton as those corridors provide access to the proposed site from Route 24. In addition, due to its proximity to Route 24, Route 138 is used as an alternative route from Route 128 when there is an incident on Route 24. Therefore, the Route 138 corridor has the potential to be impacted by the proposed project and should be reviewed closely to ensure that there are no negative impacts.

Future public transportation connections should be an important component for this proposed project. Large public transportation vehicles are harder to maneuver, require more space, operate on their own schedule, and therefore, require different provisions than a passenger motor vehicle. As such, the local Regional Transit Authorities Greater Attleboro Taunton Regional Transit Authority (GATRA) and Brockton Area Transit Authority (BAT) should be consulted to improve upon the conceptual designs, discuss potential service enhancements, and to plan for potential fixed route interconnectivity.

Bicycling and walking and the simplest forms of transportation and afford basic mobility to all. They offer to our communities a great number of benefits that improve the quality of life beyond just transportation alone. MassDOT's new Complete Streets design initiative is aimed accommodating all transportation system users to ensure the highest level of multimodalism. As such, the project should include bicycle and pedestrian circulation site plans, which should include, but not be limited to: conceptual site sidewalk locations; crosswalk locations, bicycle lanes, and secure storage areas in order to ensure that the proposed project provides for safe and realistic bicycle and pedestrian travel.

Traffic and safety impacts related to this project may not be fully apparent following the first opening of the facility; therefore a commitment from the proponent to continue working with MassDOT, the host community, the surrounding communities, and the regional stakeholders to ensure that all issues are addressed is important.

**SOUTHEASTERN REGIONAL PLANNING AND ECONOMIC DEVELOPMENT DISTRICT****Traffic**

This report documents the estimated traffic demand resulting from the proposed Raynham slot parlor proposed at the site of the former Raynham Dog Track in Raynham, Massachusetts. The traffic distribution analysis in this report was based on a simplified mathematic model which is inspired by the gravitational theory of Newtonian Physics assuming that the number of trips is directly proportional to the total population of the places (in this case, we used city and town as places) and inversely proportional to the travel time between the casino as a destination and the places as origins. The analysis evaluates the trip distribution pattern from over 3.2 million people in major cities and towns within portions of the state of Massachusetts and Rhode Island that have the highest likelihood of trip origins. We assume the further away the community is the less likely people will come to consume at the casino by surface transportation.

This analysis does not evaluate the casinos' market share among the existing and future casino sites because it is not within the scope of this study and, in essence, that type of study is more complex and requires more data of casino customers and business operation. By the time more data is available, the data in this report could be expanded to include more assumptions.

The proponent's estimate of 7541 trips/day generated by the facility was utilized in this analysis. This number could increase or decrease based upon future phases or increased competition.

SRPEDD's analysis was not detailed enough to find a measurable deterioration in the level of service at locations in other communities in the SRPEDD region (i.e. Lakeville, Berkley, Dighton and Rehoboth) attributable to the Raynham facility, although no significant impact is expected.



## D. ENF ANALYSIS

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The ENF includes a transportation study that provides an analysis of the project's traffic impacts and identifies a number of transportation improvements to address the transportation impacts resulting from the Full Build development. Based on the ENF analysis the Proponent has committed to a mitigation program consisting of traffic signalization along Route 138, associated geometric improvements and a Transportation Demand Management (TDM) Program.

Access and egress to the site will be via three existing curb cuts on Route 138 that will be modified and improved for the project. The Proponent has proposed an actuated traffic signal at the main boulevard entrance (the primary entrance to the site) from Route 138. The north curb cut will be under stop control and would be designed as a service-only entrance/exit. The south curb cut will be designed to restrict left-turns out of the site,

The project has the potential to generate 5,800 new adt on weekdays. Therefore, 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 TDM 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.

### Study Area

The transportation study includes an evaluation of the study area transportation network and presents an analysis of existing and future Build and No-Build conditions for each intersection. The trip distribution is expected to be roughly 50 percent from the north of the site and 50 percent from the south of the site, with a majority of the trips from the north via Route 24 and a majority of the trips from the south via Interstate 495 (I-495). The following intersections are included in the study area:

- Route 138 (Turnpike Street)/Route 106 (Foundry Street) intersection;
- Route 138 (Broadway)/Raynham Park North Driveway intersection;
- Route 138 (Broadway)/Raynham Park South Driveway/Robinson Street intersection;
- Route 138 (Broadway)/Elm Street East/Elm Street West intersection;
- Route: 138 (Broadway)/I-495 Northbound Ramps intersection; and
- Route 138 (Broadway)/I-495 Southbound Ramps intersection.

The following intersections which may be impacted by the proposed casino, should be included in the revised TIAS as requested by MassDOT:

- Route 24/West Center Street (Route 106) intersection;

- Route 138 (Washington Street)/Turnpike Street intersection; and
- Route 138 (Washington Street)/Belmont Street intersection.

The DEIR should include the gravity model employed to develop trip distribution assumptions, backup documentation and a clear explanation of how percentages were derived. In addition, the gravity model should be employed to consider the extent to which the proposed casino resort in Taunton could affect trip distribution.

## E. CONSULTANT ANALYSIS

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### 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 Bridgewater.

#### 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: Bridgewater

The Town of Bridgewater has submitted a petition to be designated as a “Surrounding Community” with respect to the proposed Raynham Park Slots Casino. The following summarizes our review with respect to the above factors.

- Applicant Traffic Study

The Applicant (RP) has submitted a traffic study by their consultant (Nitsch) 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 Nitsch traffic study examined locations essentially along Route 138 in Raynham north of Route I-495. 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 Bridgewater.

- RPA/MassDOT Comments

Comment letters and memoranda prepared by MassDOT and the two area regional planning agencies: Old Colony Planning Council (OCPC) and the Southeastern Region Planning & Economic Development District (SRPEDD) were reviewed to obtain any potential insights or concerns related to the proposed casino and the impact on Bridgewater.

MassDOT comments to date have been in relation to the ENF filed by the Applicant. In that comment letter, the DOT comments focused on Route 24, Route 106 as well as the Applicant's forecasts methods. DOT did not mention any potential concern relative to Route 104 in the Town of Bridgewater nor called for the Applicant to include any in subsequent environmental studies. One possible reason is that Route 104 west of Bridgewater center is not under MassDOT jurisdiction with the exception of the area of the Route 24 interchange.

In contrast to MassDOT, both regional planning agencies: Old Colony Planning Council (OCPC) and the Southeastern Regional Planning and Economic Development District (SERPEDD) have commented to MEPA that the Applicant's study has not adequately evaluated a broad enough area including the Route 104 corridor in Bridgewater. Both have called for it to be included in subsequent MEPA analyses.

Notes:

The major route of potential concern in Bridgewater is Route 104.

The Town of Bridgewater did not submit any comments to MEPA as part of the ENF review but the RPA of which Bridgewater is a member did submit comments.

- GREEN Analysis

As part of the Green analysis, information contained in the Nitsch traffic study as well as other information such as the Market Analysis included in the RP application were reviewed for relevant information. Additionally, data and reports available through MassDOT and the regional planning agencies were reviewed to obtain additional information to help address the factors. Prior to the review of the factors with respect to Bridgewater's petition, a brief summary of information relative to the proposed Raynham casino is provided.

The proposed slots casino in Raynham is to be located off Route 138 on the site of the former Greyhound Racing site. The site is currently active with Simulcast activity as well as other unrelated activities (i.e. trash hauling business) occurring. Route 138 is a State owned and

maintained in this area two lane highway. North of the site is Route 106 in Easton. The Route 106 intersection with Route 138 is currently signalized and id planned for some improvements by the MassDOT. Route 106 connects Easton with West Bridgewater to the east. Route 106 also intersects with Route 24 approximately 1.3 miles from Route 138. Approximately 1.5 miles south of the site is the Route138 interchange with I-495. Elm Street intersects Route 138 approximately 1.3 mile south of the site and the intersection is controlled by a traffic signal.

The Nitsch study estimates that the proposed casino project will result in a total traffic generation of approximately 7,500 over the course of the day with a net new number of trips being approximately 5,850. The Nitsch study estimates total site weekday PM peak trips to be 1,123 vehicle trips with a net new number of trips during the PM peak hour of approximately 960. They did not complete an analysis of Saturday conditions when one expects the casino to be at its peak level of activity. It should be noted that MassDOT has raised questions related to the trip forecasting methods and results. Our review of casino trip making in general as well as compared to the other proposals currently under review also would suggest that the casino project related trip generation might be stated low in the Nitsch study.

The town of Bridgewater is located to the east of Raynham and is a bordering community. Elm Street that is located south of the project site on Route 138 provides a connection to Route 104 in Bridgewater. Route 104 is a State numbered route that passes through Bridgewater and later intersects with Route 106 in East Bridgewater where that route continues to the east providing access to communities such as Halifax, Plympton and Kingston. Within Bridgewater, Route 104 connects in the town center where it intersects with Routes 18 and 28 – two routes that provide connections to Middleborough and Lakeville. Route 104, which comes under town jurisdiction west of the Town center, intersects with Route 24 as well. Based on data from the Old Colony Planning Council, Elm Street east of Route 138 in Raynham carries approximately 4,200 vehicles per day while Route 104 just west of the Route 24 interchange was observed to have a daily volume of approximately 9,800 vehicles. One pattern that has been noted in past studies is that a relatively large movement of motorists travel between the I-495/Route 138 interchange and the Elm Street-Route 104 section avoiding the *Route 104/Route 24 interchange to I-495 movement*.

The Nitsch study notwithstanding being limited in study area and questions pertaining to trip forecasting, projected approximately 5% of the casino traffic to use Elm Street to and from the east. Our review of the analysis and information provided by the Applicant as well as information from the regional planning agencies would suggest that this movement may be between 5% and 8%. Based on these percentages and presuming the Nitsch forecasts are reasonable correct in terms of total site traffic, results in daily and weekday PM peak hour estimates of added traffic on Elm Street and Route 104 in Bridgewater of approximately 375 to 600 over the day and 55 to 90 during the PM peak hour. Again, the Applicant did not provide an analysis of peak Saturday conditions but based on our assessment, the Saturday peak hour added volumes to Elm Street due to the casino could exceed 100 vehicles.

The relative traffic increases in Elm Street east of Route 138 and on Route 104 between Elm Street and the Route 24 interchange were calculated based on the potential added trips to the streets. This results in an estimated daily increase of between 8 and 14% on the Elm Street section and a 4% to 6% increase on the Route 104 section. The weekday PM peak hour increases would be between 10% to 17% on Elm Street and 6% to 10% on the subject Route 104 section. At these levels, the increases could be noticeable and may result in changes in operating conditions at key locations, particularly unsignalized intersections.

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 Bridgewater Center. The route between the Town Center and the proposed casino site would be via Route 104 to Elm Street to Route 138, which could be considered fairly direct if not exactly.
- Projected changes level of service (LOS) – There was no analysis done for Route 104 in Bridgewater by the Applicant. Between the Town’s center and Elm Street, Route 104 is a two lane arterial that provides access to commercial properties, office parks and residential land uses. As discussed above, the casino development could result in between 55 and 90 vehicle trips added to Route 104 during the weekday PM peak hour. There was no analysis completed for this corridor by the Applicant so the current operating levels are not fully known. However, analysis provided by the OCPC shows that the Route 104 intersection with Elm Street is currently operating poorly (LOS ‘F’) while the signals at the Route 24 interchange ramps are operating at LOS ‘D’ of better. An increase by 90 vehicles trips could potentially alter the levels of service although the Route 24 ramp intersections would continue operating at acceptable levels but the motorist delays at the unsignalized intersection of Route 104 with Elm Street could be significantly increased. Again, there was no peak Saturday analysis completed by the Applicant making it difficult to assess this factor.
- Increased traffic volumes on local streets – Based on the above, it is estimated that PM peak hour increases on Elm Street to range from 10% to 17% during the weekday PM peak hour while Route 104 increases would range from 6% to 10%. Daily traffic increases would be generally similar. *These levels of increase would likely be noticeable and would be considered moderately high.*
- 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 it is not known where specifically materials would be obtained from, however, with I-495, nearby with a direct connection to Route 138 and relatively short distance between I-495 and the site, it is anticipated that most longer haul trips would be via these two routes. In

addition, construction traffic including the facility that materials are procured from would be controlled to a degree by the Applicant. Thus, *the heavy vehicle traffic impact and consequently, road infrastructure impact on Route 104 should be minimal.*

- 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. There is currently no local public transit that operates along Route 138 to serve the site. There is a commuter rail station in Bridgewater with some parking. The Applicant has not proposed nor committed to encouraging transit use or providing such things as shuttles between the site and transit stations. Based on the suburban location of the proposed casino site, we would expect minimal use of public transit. Consequently, at this time, *we do not believe that there would be any significant adverse impacts on transit ridership or station parking as a result of the proposed casino.*
- Significant peak vehicle generation on State and Federal highways – The State highway that passes through Bridgewater and would be of potential concern is Route 104. As indicated, the estimated weekday PM peak trip generation related to casino trips would be between 55 and 90 vehicle trips. While Saturday peak analysis was not completed, we would estimate site trips potentially added to Route 104 during this time to be greater than 100 vehicle trips. *These levels of added trips to the two lane Route 104 highway would likely be noticeable and could be considered significant.*

### Concluding Opinion

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



## **F. APPLICATION**

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### **2-26**

As described by the Fine Point Group in its Raynham Park Market Study (included as 2-26-2), “Located within a 90 minute drive of over 5 million adults, Raynham Park is the ideal location for a slot parlor in Massachusetts. Conveniently located along Route 138, just minutes from Interstate 495, Raynham Park is easily accessible to gamblers from all over New England. This ideal site location will enable Raynham Park to recapture a very large number of Massachusetts gamers who have been taking their gaming business out of state. Estimated recapture rates, determined by the Fine Point Group, range from 60% of total estimated gross gaming revenue to 44% of estimated gross gaming revenue.

### **2-28**

Raynham Park estimates that it will invest approximately \$1.5 to \$2 million in roadway infrastructure to mitigate traffic impact for the towns of Raynham and Easton. Furthermore, Raynham Park will be financing the renovations and improvements to the Brockton Fairgrounds if the conditions are met under which there will be harness racing at the Fairgrounds.

### **2-30**

Raynham Park’s facility will be developed in two phases. The first phase will include renovation of a portion of the existing building to allow continuation of existing simulcast operations and to provide a temporary slots casino. As reflected in the construction schedule included in 2-30-02, the construction period for the temporary casino conversion will be approximately six months, and it is anticipated that Raynham Park will be prepared to open its temporary casino six months from the issuance of a Category 2 license by the Commission. The construction period for the second phase will start at the same time as the temporary and the construction period will be approximately eighteen months, resulting in a projected opening of the permanent facility twelve months after the opening of the temporary casino. Construction mitigation measures are included in Raynham Park’s plan in the areas of air quality and noise, storm water/erosion and control, dewatering, and construction and demolition debris.

### **2-32**

The core usage of the Parx Raynham facility will be as a slot parlor. It will operate year round, 24 hours a day. In addition to the slot parlor, the facility will contain multiple bars and restaurants as well as an entertainment venue. The venue will have a full schedule of entertainment with a mixture of larger acts as well as a regular schedule of smaller acts meant to provide reasons for our guests to visit. The restaurants will include a sports bar that will become a main destination in the area for people to have fun and watch a game. We will also have a high end restaurant as well as another name brand casual venue. The goal will be to always have reasons in addition to the slot floor for our guests and visitors to the area to visit Parx Raynham.

Given this usage for the facility, we do not expect to see a significant seasonality. Our experience in Pennsylvania supports this expectation.

**2-34**

Parx Casino Raynham will deploy a sophisticated marketing plan that will develop and cultivate new players, recapture Massachusetts play that is leaving the state and reward those guests who build loyalty with the property.

**2-36**

While most components of Raynham Park’s marketing plan can and will be applied to attract out-of-state visitors, the only portion which specifically focuses on out-of-state visitors is the portion which addresses marketing of patrons on Parx Casino’s database. Because it will represent only a very small portion of its gaming and non-gaming revenues Raynham Park has not modeled out-of-state revenues on a best, average and worst case scenario.

**4.23**

Regional access to the proposed Raynham Park Casino is achieved by utilizing Interstate 495 (I-495) predominantly from the east, west and south and Route 24 from the north. Local roadways, including Route 138, Route 106 and Route 104 provide access to the site from the nearby municipalities of Taunton, Bridgewater, Easton, Mansfield, Norton and West Bridgewater. As part of the project development, the access and egress will be modified to include a fully-actuated traffic signal as part of a planned main boulevard entrance to and exit from the site located approximately halfway between the existing north and south curb cuts. The Greater Attleboro Regional Transit Authority (GATRA) operates a route in the nearby cities and towns of Mansfield, Norton, and Taunton. A park-and-ride facility is located along Route 106 in West Bridgewater adjacent to the interchange with Route 24. No bus service is planned as part of the project.

**4.24**

The existing transportation facilities in the vicinity of the site are generally adequate to accommodate the needs of the facility. Because the project is sandwiched between I-495 and Route 24, use of local roads will be minimal. Nevertheless, as part of implementation of its host community agreement with the Town of Raynham, Raynham Park has agreed to an extensive Roadway Mitigation Program designed to remedy any inadequacies to the transportation infrastructure. These include the widening of Broadway (Route 138), the installation of a new traffic signal, the creation of a new driveway into the site and the retiming of certain other traffic signals. A complete copy of the Roadway Mitigation Program is included as Exhibit 4-24-02.

**G. OTHER**

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**NITSCH ENGINEERING REPORT**

The Project Site will be primarily accessed via regional highways and primary access roads. The impact on local roadways is minimal and no major impacts are anticipated on local roads in nearby communities.

**Summary of Findings – Transportation**

The following points summarize the results of the Transportation impact analysis:

- Regional access to the Site is provided by Interstate 495 (I-495) from the east, west, and south and Route 24 from the north.
- Interstate 495 intersects Route 138 in Raynham, which provides direct access to the Site and will not impact nearby communities.
- To access the Site from Route 24, patrons will travel on Route 106 to Route 138, travelling through the Towns of West Bridgewater and Easton.
- Use of minor local roadways to access the Site is anticipated to be minimal.
- MassDOT has prepared 25% design plans for improvement to the Route 136/106 intersection. These plans include adding turning lanes and generally improving the geometry and function of the intersection.

**Summary of Mitigation - Transportation**

The following actions are proposed to mitigate the potential transportation impacts to the nearby communities:

- The proponent is proposing a traffic signal at the main boulevard Site entrance/exit, which will facilitate access and egress and reduce impacts on local roadways within the Town of Raynham. The intersection of Route 138 and Route 106 in Easton and the proposed MassDOT improvement project to this intersection has been studied as part of the planning for the development of the Site.
- This intersection will require additional improvements/mitigation than the currently planned improvement project for this intersection.
- The required improvements at this intersection will be coordinated with the Massachusetts Department of Transportation (MassDOT) and the Town of Easton.

**November 14, 2013 – Community Comments at Public Meeting**

21 MR. DUTTON: My name is Michael  
 22 Dutton. I am the town manager of the town of  
 23 Bridgewater. Thank you for this opportunity to  
 24 testify on the town of Bridgewater's petition

1 to be named a surrounding community.  
 2 For reasons set forth in the  
 3 petition we filed on October 31, we urge the  
 4 Commission to find that Bridgewater will

5 experience significant impacts due to the  
6 operation of the facility. The applicant has  
7 already designated every other town abutting  
8 Raynham a surrounding community but not the one  
9 with the second longest common border and the  
10 shared school district. My testimony today is  
11 short.

12 CHAIRMAN CROSBY: Thank you.

13 MR. DUTTON: That always scores  
14 points. We are adding information to our prior  
15 petition as follows. Number one, an analysis  
16 of the applicant's nearby community impact  
17 report dated September 2013 finds two critical  
18 flaws. First, the applicant contends that the  
19 site is located approximately one mile from the  
20 Bridgewater line. That's correct. But over  
21 two miles by road via Routes 138 and 106. This  
22 ignores the most direct route which is Route  
23 138 South to Elm Street in Raynham to Route 104  
24 in Bridgewater, which is a primary east-west  
1 roadway which transects most of Bridgewater.  
2 Similarly, the study makes no  
3 reference to travel over Route 104 Westbound to  
4 Route 138 North as a means of accessing the  
5 proposed facility.

6 Number two, the applicant refers to  
7 the report issued by the Old Colony Planning  
8 Council, the regional planning organization,  
9 which fails to find any impact, significant  
10 impact to Bridgewater. This report simply is a  
11 review of the applicant's nearby community  
12 study, which we find flawed and does not  
13 analyze any data or independently generated  
14 reports.

15 In fact, the OCPC report itself

16 suggests the applicant should expand its  
17 traffic study area to include Route 106 and  
18 Route 104 through Bridgewater, because it  
19 believes that the local roadways will be  
20 significantly impacted.

21 Also, in 2012 Mass. DOT commissioned  
22 an OCPC study specifically to review Route 104  
23 in Bridgewater for bottlenecks and to make  
24 recommendations for roadway improvements. We  
1 clearly already have a highly congested  
2 roadway, which will be impacted by additional  
3 east-west traffic generated by the slots  
4 facility.

5 Number three, an increase in traffic  
6 on Routes 24 and 495 as the applicant concedes  
7 will generate additional emergency calls for  
8 Bridgewater as the first responder. Since  
9 2006, our fire department has responded to  
10 almost 500 calls on Routes 24 and 495. Since  
11 2006, our police department has responded to  
12 over 300 calls to the most westerly part of  
13 Route 104. Since 2006, our fire department has  
14 responded to almost 100 calls for mutual aid to  
15 Raynham with whom we have a mutual aid  
16 agreement.

17 An increase in traffic to and from  
18 the applicant's proposed facility will require  
19 additional resources from the town of  
20 Bridgewater.

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## 3. DEVELOPMENT

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### Legal Framework

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

Bridgewater's petition does not include any concerns regarding the development of the facility.

The Applicant's Nearby Communities Impact Report states that "[d]ue to their distance from the Site, there are not anticipated to be construction impacts to Bridgewater..." Further, the Applicant notes that its Traffic Management Plan will "require construction-related traffic to access the Site using I-495 and Route 138 through the Town of Raynham to eliminate construction period traffic impacts to the nearby communities."

The ENF calls on the Applicant to recommend mitigation of construction impacts in its draft Environmental Impact Report (DEIR).

Green International noted: - "The Applicant has stated that construction related heavy vehicle traffic would be controlled and remain on the area's major roadways. At this time it is not known where specifically materials would be obtained from, however, with I-495, nearby with a direct connection to Route 138 and relatively short distance between I-495 and the site, it is anticipated that most longer haul trips would be via these two routes. In addition, construction traffic including the facility that materials are procured from would be controlled to a degree by the Applicant. Thus, **the heavy vehicle traffic impact and consequently, road infrastructure impact on Route 104 should be minimal.**"

## **A. COMMUNITY PETITION**

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None

## **B. APPLICANT RESPONSE**

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First, as part of its Phase 2 Application, Raynham Park submitted a Nearby Communities Impact Report and a Raynham Slots Casino Traffic Impact Study, both prepared by Nitsch Engineering, and both of which conclude that the Community is not likely to experience impact from the construction or operation of the Raynham Park gaming establishment.

Second, the local Regional Planning Agency ("RPA,"), the Old Colony Planning Council (OCPC), issued a Report on October 23, 2013, which is attached hereto, which also contains no finding of significant impact to the Community by the construction or operation of the Raynham Park facility.

## **C. RPA ANALYSIS**

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None

## **D. ENF ANALYSIS**

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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 what operations will continue during construction and, if so, how parking and other needs will be accommodated during construction.

## **E. CONSULTANT ANALYSIS**

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None

## **F. APPLICATION**

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### **2-10**

Raynham Park’s facility will be developed in two phases. The first phase will include renovation of a portion of the existing building to allow continuation of existing simulcast operations and to provide a temporary slots casino. As reflected in the construction schedule included in 2-10-02, the construction period for the temporary casino conversion will be approximately six months, and it is anticipated that Raynham Park will be prepared to open its temporary casino six months from the issuance of a Category 2 license by the Commission. The construction period for the second phase will start at the same time as the temporary and the construction period will be approximately eighteen months, resulting in a projected opening of the permanent facility twelve months after the opening of the temporary casino. It is estimated that the temporary casino project will require 143,000 construction hours, and the permanent casino project 728,750 construction hours – for a total of 871,750 construction hours.

### **2-30**

Raynham Park’s facility will be developed in two phases. The first phase will include renovation of a portion of the existing building to allow continuation of existing simulcast operations and to provide a temporary slots casino. As reflected in the construction schedule included in 2-30-02, the construction period for the temporary casino conversion will be approximately six months, and it is anticipated that Raynham Park will be prepared to open its temporary casino six months from the issuance of a Category 2 license by the Commission. The construction period for the second phase will start at the same time as the temporary and the construction period will be approximately eighteen months, resulting in a projected opening of the permanent facility twelve months after the opening of the temporary casino. Construction mitigation measures are included in Raynham Park’s plan in the areas of air quality and noise, storm water/erosion and control, dewatering, and construction and demolition debris.

### **2-37**

Because the vast majority of Raynham Park’s gaming patronage is projected to be in-state, all of Raynham Park’s Market Plan (2-37-02) focuses on in-state visitors, with the exception of portions designed to attract out-of-state persons on Parx Casino’s database.

### **4-25**

Land has been reserved in the southwestern portion of the Site, adjacent to the railroad, for the potential future Raynham Park commuter rail station. Service to Raynham Park Casino would be part of the MBTA’s effort to extend rail service to southeastern Massachusetts. The Owner will continue to coordinate with the MBTA.

### **4.31**

The Site is located in a rural area and is surrounded almost entirely by woods, wetlands, or industrial development. Although there are no commercial attractions in the immediate vicinity of Raynham Park, there are restaurants located along Route 138 between the project site and major access highways. The proposed project includes the installation of a fully-actuated traffic signal on Route 138 at the main boulevard entrance, which will improve access between the site and the nearby restaurants. The proposed project includes a Roadway Mitigation Program which will improve access between the site and the nearby restaurants on Route 138 by installing a traffic signal, widening Route 138 and creating a main site driveway.

### 5.33

The proposed Project may add approximately 5,800 trips per day to the existing Site for an estimated total of 7,500 trips per day. A traffic management plan will be prepared for the construction phases of the Project. The plan will likely recommend the use of 495 to avoid trips through Easton and the Route 138/106 intersection. Construction deliveries to the Site will use only non-local roadways, and will be scheduled to occur during non-peak traffic periods. A final traffic management plan will be coordinated with MassDOT, the Town of Raynham, and the Town of Easton. Efforts to encourage public transportation via commuter rail service to the Site are part of Phase IV of the Project.

## G. OTHER

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### NITSCH ENGINEERING REPORT

The Project will be constructed in three phases as described in Section 1.5. Construction of Phase 1 of the Raynham Park Casino will begin promptly after the gaming license is obtained and all other necessary permits and approvals are received and finalized. The approximate timeframes for each phase of construction are provided below:

#### Phase 1 – Temporary Casino

Start Date	After Award of License
Design/Build & Permit Schedule	4 ½ Months
Construction Schedule	5 ½ Months

#### Phase 2 – Permanent Slot Casino:

Start Date	After Award of License
Design/Build & Permit Schedule	9 Months
Construction Schedule	12 ½ Months

#### Phase 3 – Entertainment Expansion and Hotel:



Start Date	Market Dependent
Design/Build & Permit Schedule	TBD
Construction Schedule	TBD

### Summary of Findings - Construction

The Project will follow all applicable laws and regulations during construction activities. The following points summarize the results of the Construction impact analysis:

- Potential construction impacts to the nearby communities include construction vehicle traffic, air quality, noise, erosion and sediment, and stormwater.
- Due to their distance from the Site, there are not anticipated to be construction impacts to Bridgewater, West Bridgewater, Norton, and Middleborough.
- There is the potential for directly adjacent portions of Taunton to be affected by some construction activities, specifically air quality and noise conditions at the Site. Construction period traffic, air quality, noise, erosion and sediment, and stormwater may also impact the Town of Easton. Proposed mitigation for these impacts are outlined in Section 3.3.2 Due to the observed groundwater and bedrock information and the minimal proposed cuts, construction dewatering (removing groundwater from excavations) is anticipated to be limited. If dewatering is necessary during construction, including the discharge of stormwater that is removed from excavations, trenches, foundations, vaults, or other similar points of accumulation, the project will include design specifications and details for all dewatering practices will be installed and maintained to comply with Part 2.1.3.4 of the Construction General Permit.

### Summary of Mitigation - Construction

The following actions are proposed to mitigate the potential Construction impacts to the nearby communities:

The Proponent will work with the Towns of Raynham and Easton to prepare a Traffic Management Plan to minimize potential construction traffic impacts. The Plan will require construction-related traffic to access the Site using I-495 and Route 138 through the Town of Raynham to eliminate construction period traffic impacts to the nearby communities. Construction deliveries to the site will occur only during nonpeak periods.

- The Project will pursue United States Green Building Council's Leadership in Energy & Environmental Design (LEED) certification for the project which has requirements for construction including recycling demolition and construction waste, and addressing indoor air quality.
- The construction contract will require contractors to pursue a number of measures to reasonably reduce potential emissions and minimize impacts from construction vehicles, such as:
  - Monitor construction practices to minimize unnecessary transfers and mechanical disturbances of loose materials.

- Use appropriate mufflers on equipment, and properly maintain intake and exhaust mufflers.
- Use muffling enclosures on continuously-operating equipment (e.g., air compressors and welding generators).
- Use the most quiet construction operations, techniques, and equipment, where feasible.
- Turn off idling equipment.
- Erosion and sedimentation controls are proposed to minimize the construction related impact of the proposed project on surrounding and downstream areas. Since this project will disturb more than one acre of land, a National Pollutant Discharge Elimination System (NPDES) Stormwater Construction General Permit (CGP) is required.
- The CGP requires the development and implementation of a Stormwater Pollution Prevention Plan (SWPPP) for construction activities, which is a detailed erosion and sediment control plan that indicates the structural and non-structural erosion and sediment controls that will be employed, as appropriate, to control erosion on the construction sites. These measures include such items as temporary seeding, mulching, silt fences, check dams, and storm drain inlet protection. The SWPPP also includes provisions that these erosion control measures be inspected regularly to ensure that they are functioning properly.
- The Proponent will reuse or recycle demolition and construction materials to the greatest extent feasible.
- Construction procedures will allow for the segregation, reuse, and recycling of materials. Materials that cannot be reused will be transported in covered trucks by a contract hauler to a licensed facility. All construction related traffic will be directed to Route 495 via Route 138 in Raynham to minimize traffic impacts to nearby communities.

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## 4. OPERATION

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### Legal Framework

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

Bridgewater's "critical concern, and one not contemplated by the Expanded Gaming Act and its regulations, is the potential impact on Bridgewater's shared regional school district." Bridgewater expressed a concern that Raynham, with additional contributions from the Applicant, could dissolve the Regional School District." Further, higher contributions from Raynham could negatively impact educational opportunities in Bridgewater. Bridgewater also expressed concern that its lower housing costs could lead to greater school enrollment.

The Applicant provided no response to the concern about regional school budgets. However, in its Nearby Communities Impact Report, it states that "[b]ased on the history of the Site, the size of the Project and the Site's proximity to residential neighborhoods in nearby communities, there will be minimal negative impacts to the housing market in the nearby communities."

The OCPC stated that "it seems unlikely that there would be a major housing impact associated with a slot parlor on the surrounding communities. Under the maximum jobs scenario of 600 new jobs, almost all of the positions (consisting of both mostly unskilled and semi-skilled jobs) would be able to be filled by applicants within a 30 minute commute of the site without requiring the construction of new housing and new families into the surrounding communities" but that this result "cannot be guaranteed."

Neither the Commission's internal staff nor outside consultants have determined a method to verify whether Bridgewater's concerns about regional school budgets and participation by Raynham are likely. There is no reference to contributions to school budgets in Raynham's Host Community Agreement.

Lynn D. Sweet Consulting Group noted:

“We find that it cannot be determined from the submitted materials and our independent evaluation that the communities surrounding Raynham will be significantly and adversely affected by the operation of the gaming establishment after its opening due to housing impacts resulting from the facility.”

“Old Colony Planning Council document examined vacant units in a 20 mile radius around the site and concluded that it seems unlikely that there would be a major housing impact associated with a slots parlor on the surrounding communities.”

## **A. COMMUNITY PETITION**

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None

## **B. APPLICANT RESPONSE**

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First, as part of its Phase 2 Application, Raynham Park submitted a Nearby Communities Impact Report and a Raynham Slots Casino Traffic Impact Study, both prepared by Nitsch Engineering, and both of which conclude that the Community is not likely to experience impact from the construction or operation of the Raynham Park gaming establishment.

Second, the local Regional Planning Agency ("RPA"), the Old Colony Planning Council (OCPC), issued a Report on October 23, 2013, which is attached hereto, which also contains no finding of significant impact to the Community by the construction or operation of the Raynham Park facility.

## C. RPA ANALYSIS

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### OLD COLONY PLANNING COUNCIL

#### Housing Needs Analysis

Nitsch Engineering's "Nearby Communities Impact Report for Raynham Park" as it pertains to housing is very limited and only includes the following statement: "Based on the history of the Site, the size of the Project and the Site's proximity to residential neighborhoods in nearby communities, there will be minimal negative impacts to the housing market in the nearby communities." Obviously, it is difficult to conduct an analysis of housing needs from this information alone. Data from the 2007-2011 U.S. Census Bureau's American Community Survey (ACS) shows that there were 588,171 housing units located in 63 communities within a 20 mile radius of the site. Of those 588,171 housing units, 6.9% (or more than 40,000 units) were vacant, which indicates that at that time there was adequate vacant housing available to meet the demand associated with the 600 new jobs that are expected to be created by the new slot parlor. It is unclear however how many of the vacant units are affordable, how many bedrooms each may have, and precisely where they are located. It should be noted that the data utilized in the ACS is estimated, is 2-6 years old, and was collected during the height of the most recent economic downturn.

Utilizing this data, it seems unlikely that there would be a major housing impact associated with a slot parlor on the surrounding communities. Under the maximum jobs scenario of 600 new jobs, almost all of these positions (consisting of both mostly unskilled and semi-skilled jobs) would be able to be filled by applicants within a 30 minute commute of the site without requiring the construction of new housing and the introduction of new families into the surrounding communities. While this may be a likely scenario, it cannot be guaranteed. It should be noted that many communities surrounding the slot parlor have a number of undeveloped and unprotected parcels of land that could be developed into housing to support employees of the slot parlor.

Based on this information, it is recommended that communities investigate conducting a thorough housing analysis so that they may get a clearer sense of the current housing situation to determine, what, if any impacts they may receive as a result of the project.

#### Economic Development and Fiscal Impact Analysis

The Economic Impact Study conducted by Marquette Advisors examined what the direct, indirect and induced financial impacts would be on a local and statewide basis if a slot parlor was constructed at the Raynham Park site. The study states that "casino gaming has generated desperately needed revenue for state and local governments, throughout the U.S." and goes on to state that "casino gaming and ancillary development components provide major benefits in the form of jobs, wages and benefits." The study looks at how the following four aspects of

economic development will be impacted as a result of this project: employment, revenue, tourism, and the local business community. Employment: This project will generate a number of new jobs that are sorely needed in Bristol County. Still struggling from the most recent economic downturn, the unemployment rate in Bristol County was 9.3% in August 2013, which was the highest county unemployment rate in the state. The construction phase of this project alone is expected to create 720 direct jobs at the site and another 680 jobs from indirect or induced impacts. Construction related jobs are well-paying jobs (averaging more than \$50,000 annually) and are expected to last approximately 18 months. The project is also expected to create 804 permanent jobs at the slot parlor, which would make it the eighth largest employer in the county. A majority of these jobs are unskilled or semi-skilled, hence the pay is lower (approximately \$30,871 annually or \$42,298 if based on full-time employment) than the aforementioned construction jobs.

Revenue: The project will generate revenue through a variety of sources at the state and local levels. The facility itself is expected to generate \$122,500,000 in gaming taxes annually, \$3,815,000 in income tax annually, and \$10,500,000 in food, beverage and retail taxes annually. The facility will also pay the Town of Raynham \$2,500,000 million annually in property taxes, as well as pay taxes on approximately \$33,000,000 in supplies and services they are expected to consume annually. Lastly, visitors to the site are expected to patronize local businesses, such as hotels, restaurants, gas stations and shops, which is expected to generate another \$6,970,000 in taxes annually.

Tourism: The Study notes that the slot parlor is expected to draw approximately 2,281,250 annual visitors. Naturally many of these visitors will also patronize other businesses while in the area. In particular, visitors travelling from a distance are especially beneficial in terms of economic development, as they may utilize hotels, restaurants, fuel stations and other retail establishments. The study notes that the facility is estimated to attract approximately 1,910 customers per day from beyond a one-hour driving distance, and estimate that approximately 10% of these customers will stay overnight in a nearby hotel. The study notes that "this equates to an average of 96 occupied hotel rooms per night, based on an average of two adults per room. Off-site hotel revenues attributable to tourism is estimated at \$5,431,200 annually, based on an average rate of approximately \$155 per occupied room."

Local Business Community: The study states that surrounding business should not suffer as a result of this project, rather they are expected to benefit from it. The study states that the facility will consume \$33,000,000 annually in goods and services (gaming supplies, food and beverages, retail goods, maintenance supplies, security, etc.) to support its ongoing operations. It is expected that they would consume these goods and services locally, but it does not state that as fact. OCPC recommends that communities work with the project proponent and their local business community to ensure that local businesses receive preference in supplying these goods and services.

While the author of the study, Marquette Advisors, offers a broad range of consulting services tailored to the gaming and hospitality industries, it should be noted that the figures used in the study are estimates based on formulas, programs and results from casinos throughout the country and are not unique to one particular place.

#### Water Resources

**Water Supply:** The site currently utilizes a water supply source outside of the Old Colony region, as it is currently serviced by the North Raynham Water District, which owns and operates its own public wells. It should be noted that the proposed project is pursuing LEED certification, and as such the project will use low-flow water fixtures which will reduce future sanitary flows compared to current fixtures at the existing facility. It is not anticipated that the project will need to utilize water sources from communities within the Old Colony region. If additional water supply is needed, an opportunity exists to utilize water produced from the Aquaria Desalination Plant in Dighton.

**Wastewater:** The site currently also utilizes wastewater treatment outside of the Old Colony region, as it is currently serviced by the Raynham Sewer Department. The site is serviced by a private onsite sanitary sewerage pump station that discharges to a municipal pump station across Route 138 from the site. Both pump stations are relatively new, as they were installed 7 to 8 years ago. The Town of Raynham has an intermunicipal agreement with the City of Taunton; under this agreement, the Town of Raynham's sewer collection system discharges to the wastewater treatment facility owned and operated by the City of Taunton. The site currently has a permit to discharge 23,000 gallons per day to the Raynham sewer collection system. The proponent is currently discussing the existing permitted flows versus the proposed flows, and how the phasing of the project may impact the city's available allotments within their agreement with Taunton. It is not anticipated that the project will need to utilize wastewater sources from communities within the Old Colony region.

**Stormwater Management:** Stormwater will be improved as a result of this project. Currently the site's stormwater runoff discharges into the Hockomock Swamp substantially unmitigated and untreated. Through the following measures a net positive impact on the Hockomock Swamp will occur; a reduction in the impervious surface on-site by approximately 17.8 acres, a reduction of impervious surfaces within the Riverfront and within the Buffer Zone to the Swamp, an upgrade to the drainage collection system to meet current standards, the construction of a series of gravel wetlands along the Swamp to provide water quality treatment.

#### Public Safety

Nitsch Engineering's "Nearby Communities Impact Report for Raynham Park" as it pertains to public safety is limited to just two paragraphs. It states that "the site will be serviced primarily by Town of Raynham Police and Fire for response to a call at the facility" and goes on to state that "there is not anticipated to be a significant impact on the public safety departments in nearby



communities." The only data contained within the report are response times to the facility from police and fire departments in the surrounding communities.

This report only references impacts to the potential facility and does not take into account potential public safety impacts that may be experienced by surrounding communities as a result of the project. The most notable public safety impact that surrounding communities will mostly likely suffer is from traffic related issues, such as accidents, speeding, medical emergencies etc. that will result from the increased traffic that will be coming to and from the facility. The project proponent has noted that approximately 50% of the traffic to and from the facility will be coming from the north, meaning that there will be an increased amount of traffic on roadways outside of Raynham leading to the site. The responsibility of responding to these traffic related issues will be addressed by the community in which the issue occurs. This will cause each community's public safety departments to be taxed more than they currently are, which will likely lead to increased costs.

## **SOUTHEASTERN REGIONAL PLANNING AND ECONOMIC DEVELOPMENT DISTRICT**

### Housing

The 2011 data further show that there is adequate vacant and affordable housing available to meet the demand associated with the 411-600 new jobs projected to be created by Raynham Park. Of the 588,171 housing units within a twenty mile radius of Raynham Park, 6.9% (in excess of 40,000) are vacant.

Furthermore, 173,394 units of housing within that area are classified as rental units and the vacancy rate among rental units is 4.4% of the housing stock, or 8,152 vacant units.

The impact of jobs and housing associated with the slot parlor on surrounding communities is expected to be negligible. Under the maximum jobs scenario of 600 new jobs, virtually all of these positions can be filled by job seekers within a half hour commute of the site without requiring the construction of new housing and the introduction of new families into the surrounding communities.

The availability of existing labor force within a reasonable commute will have a negligible impact on local school systems because the jobs will be filled mostly by existing residents of the region.

Outside of the host community of Raynham, the largest numbers of workers are likely to come from the bigger regional communities within easy commuting distance, such as Taunton, Brockton and Attleboro.

*(NOTE: The expected minimal impact on housing and schools associated with the Raynham Park slot parlor cannot be assumed to be equivalent for a category 1 commercial resort casino or Native American casino, where the labor force skill requirements are more diverse and the number of workers will be as much as ten times larger.)*

### Public Safety

SRPEDD has not completed its analysis of the potential impacts to public safety services provided by the surrounding cities and towns.

## SOUTHEAST REGIONAL PLANNING AGENCY

\*Note that the below report concerns both Raynham and Plainville.

### Public Safety Impacts Related to Potential Slots Casino in the SRPEDD Region

Research conducted for public safety impacts, specifically drunken-driving and increased ambulance calls resulted in findings from existing slot casinos around the United States. While it is easy to assume impacts likely due to a potential casino opening, this is not realistic in terms of hard data. The best source is to draw from existing casinos.

SRPEDD reached out to the Region V EMS Director regarding data for the following concerns:

- ✓ Number of ambulance calls per month on State highways due to drunk driving.
- ✓ Average call for response on secondary roads within communities (for potential slots casino).
- ✓ Extra costs/impacts to communities for ambulance dispatch.

Please see below for partial response to the above questions.

*The state EMS office is gathering the information on accidents that EMS responded (including suspected alcohol/ drug use. They are classified together so they cannot separate alcohol and drugs) to in the communities around Plainville and Raynham. The Gaming Commission/SRPEDD/communities need to realize that these numbers for incidents involving alcohol/ drugs are not hard numbers because it relies on the EMS providers and how they input the information. It is also noted that there are many, many variables with obtaining these types of data requests. NOTE: As of report date, SRPEDD is waiting on the State EMS Office to provide additional data.*

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The following is an excerpt (specifically for public safety impacts) from a report prepared by Problem Gambling Solutions, Inc., dated May 27, 2013 for the Town of Plainville.

The report is titled; “The Impacts of Gambling on Local Citizens.”

Public service impacts that appeared most relevant to local citizens, with the opening of the Proposed slot parlor was:

Police activity may increase by 2% to 10% placing some additional demand on the Plainville Police Department. The majority of the increased activity is expected to result from a larger volume of motor vehicle incidents, an increase number of property crimes, and an increase in domestic dispute calls.

The opening of the proposed slot parlor at the Plainridge Racecourse is anticipated to result in a 5% to 10% increase in Fire Department activity primarily due to increases in emergency medical service (EMS) calls. Much of that increase is anticipated to be related to increased visitation to the slot parlor from inside and outside of the town.

Table 1.

**SUMMARY TABLE OF IMPACTS ON LOCAL CITIZENS**

Impact Area	Increase	Mixed or No Impact	Decrease	Comments
<b>HEALTH &amp; SOCIAL</b>				
Problem Gambling Prevalence	X			Estimated 35% to 45% increase (prevalence increases with increased proximity to gambling venue)
Child Abuse and Neglect	X			Small increase
Suicide Rate	X			Small increase
Crime Rate	X			Small increase; primarily in non-violent crimes
Vehicle Accidents	X			Small increase related to driver fatigue and DUI
Unsafe Sex (STDs)	X			Magnitude difficult to estimate
Domestic Violence	X			Small increase in reports; actual magnitude difficult to estimate
Divorce	X			Small increase
<b>PUBLIC SERVICE</b>				
Police Department	X			Likely increase in total activity ranging from 2% to 10%
Fire Department	X			Likely increase in total activity ranging from 5% to 10%, primarily due to increases in EMS calls
<b>ECONOMIC</b>				
Government Revenue	X			Increased government revenue through taxes
Employment		X		Small spike in local employment during construction and early operation, but over time gains will either level off or slightly decrease
Bankruptcies		X		Small decrease during construction but by 2017 rates may slightly increase
Property Values		X		No significant changes in property value

*Note: Negative impacts are primarily related to an estimated 44% increase in problem gambling prevalence within 10 miles of the slot parlor (net gain of 1.62 additional problem gamblers for every 100 adults). Because a minority of problem gamblers has police/child welfare/employment/health service involvement their impact on the community is tempered. Additionally, gambling may be one of several factors that contributed to an individual's behaviors creating social and economic costs (i.e., the mental health and substance abuse comorbidities of problem gamblers are additional contributing factors).*

**Alcohol-Related Accidents:** Driving under the influence is another possible ill effect of casinos and racinos (race tracks at which slot machines are available for gamblers). A recent study found that rural or moderately sized counties with casinos saw an increase in alcohol-related fatalities.<sup>116</sup>

**Table 7. Town of Plainville Crime Data Fiscal Years 2010 to 2012<sup>149, 150, 151</sup>**

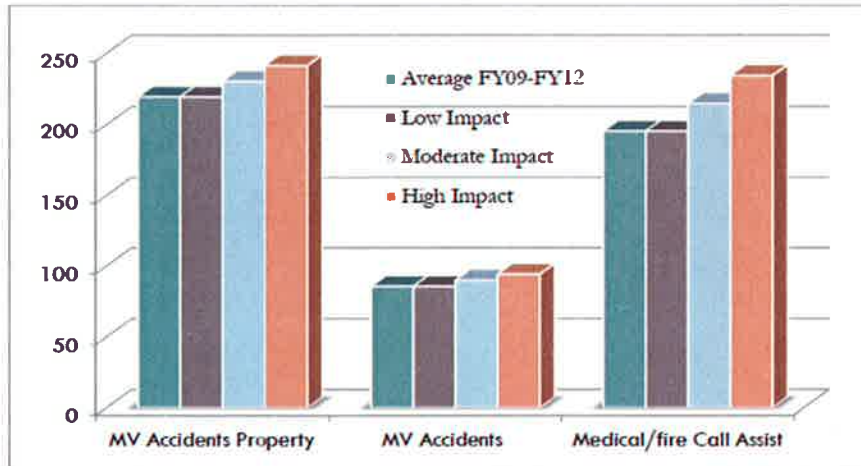
Type	FY10	FY11	FY12	Type	FY10	FY11	FY12
9-1-1 Calls	1978	2208	2626	Motor Vehicle Accidents (property)	214	221	208
Property Crimes	324	272	302	Motor Vehicle Accidents	89/1	89/1	92/0

**THE IMPACT OF GAMING ON LOCAL CRIMES**

				(Total/Fatal)			
Person Crimes	857	500	479	Officer Generated Activity	4,185	3652	3659
Burglar Alarm Calls	342	347	377	Medical/Fire Call Assist	195	195	123
Various Complaints	2,340	2052	2075	Domestic Violence - Incidents	101	99	92
Domestic Violence – Violations/ Service	5/30	11/30	6/38	Domestic Violence - Arrests	10	17	18
Total Arrests/Protective Custody	142/25	196/24	159/22	Total Incidents	8,701	10,138	10,083

*Notes: Property Crimes include: House breaks, larceny, shoplifting, & vandalism. Crimes Against the Person include, Assault & Battery, Sexual Assaults, Threats, Robbery & Annoying Phone Calls.*

Figure 9. Town of Plainville Police Department: FY09-FY12 Average Motor Vehicle Incidents and Medical/Fire Call Assists and Predicted Impact Post-Slot Parlor



Note: Low impact based on no changes from past four year average. Moderate and high impacts based on reports of approximately a 5% to 10% increase of total police activity found from SEIG reviewed studies. For medical/fire calls, 10% to 20% increase based on discussions from survey of nine fire departments conducted by the Town of Plainville’s Fire Chief Joubert.

### Fire and Emergence Medical Service

The research on the impact of gambling expansion as related to fire and emergence medical assistance service within communities reveal mixed findings. For some jurisdictions, the introduction of a casino or gaming expansion is accompanied by improved fire and emergence medical service (EMS) response times and capabilities, secondary to increased government revenues related to gaming expansion and greater budget allocations to local fire departments and other first responder services.<sup>154</sup> There are also examples in the literature where gaming expansion has been associated with negative impacts on fire department services. For example, in 1997, town officials of Montville estimated a yearly financial casino-related impact of nearly \$1 million as a result of increased costs for police, fire protection, and school spending. The majority of this spending was attributed to the construction of Mohegan Sun.<sup>155</sup> North Stonington has also reported an increased demand for fire services since the opening of the local casino resulting in the town instituting a \$140,000 financial incentive and longevity program in order to maintain adequate staffing levels.

In anticipation of the Plainridge Racecourse expansion to add a slot parlor, additional parking, and other facilities, Theodore Joubert, Chief of the Town of Plainville Fire Department, conducted an informal survey of nine fire departments identified as servicing communities that “represent the same populous for the area” where a racino was developed. From this effort, Chief Joubert

concluded that he could reasonably expect a 10% to 20% increase in EMS calls, a 5% to 10% increase for services in general, and a slight increase in fire related calls. One notable exception was a report from the Fire Chief covering the Saratoga Gaming & Raceway where the Chief reported 10 significant fire related incidents related to the nearby racino.

**Baseline Indicator Data**

**Table 8. Town of Plainville Fire Department Records Fiscal Years 2010 to 2012** <sup>156,157,158</sup>

Type	FY10	FY11	FY12
EMS calls are requests for medical aid	799	885	1061
Fire calls include structure fires, car fires, brush fires	36	182	233
Service calls include fire alarm maintenance, inspections	226	1042	1165
Hazardous calls include fuel leaks, odor investigations, suspicious items	74	156	78
Good intent – including cancelled in route, smoke scare, nothing found	107	-	-
False – including CO detectors, smoke det., sprinkler activation, heat det	210	-	-
Other – inspections, citizen complaints, mutual aid, fire alarm maint./work	799	-	-
Miscellaneous calls include lifting assists, pre-inspection assistance, public education		339	181
<b>Total Incidents / Activity</b>	<b>2402</b>	<b>2604</b>	<b>2588</b>

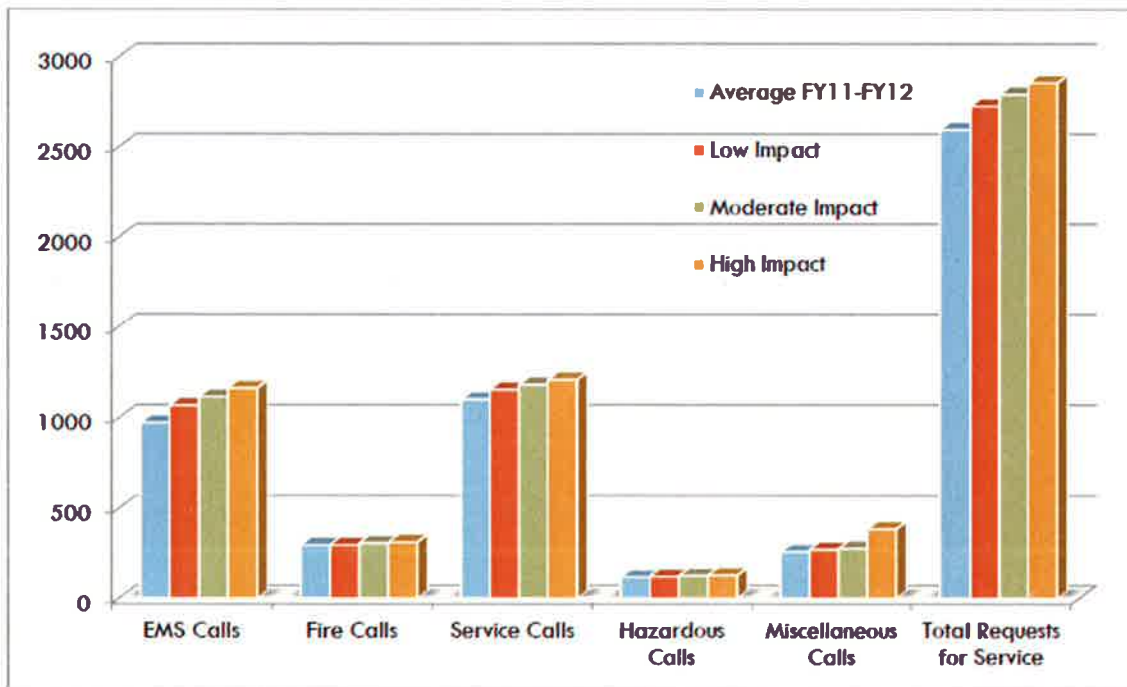
**Predicted Impact**

The opening of the proposed slot parlor at the Plainridge Racecourse is anticipated to result in a 5% to 10% increase in total Fire Department activity including a 10% to 20% increase in EMS calls. Much of that increase is anticipated to be related to increase Racecourse visitation from inside and outside of the Town. The higher racecourse visitation rates create the probability for more EMS calls by virtue of increasing the number of persons within the Department’s catchment area during racecourse business hours and by higher traffic volume.

The main issue the Plainville Fire Department faces is the distance between its one station, located downtown, and the location of the cross-town racecourse. A service call to the Plainridge Racecourse has a response time of approximately 6 to 8 minutes to cover a distance of roughly three miles. This response time does not meet the National Fire Protection Association standards for fire related calls but does meet the standard for EMS response time (maximum of 8 minutes). Chief Joubert stated his community would benefit from a sub-station in the northeast area of the Town with an engine and ambulance in order to provide better service to the new developments and northeastern area of the Town.

The implications for the citizens of the Town of Plainville depend on how the increased demand for fire and EMS services are resolved. With no additional infrastructure to the Town’s Fire Department, the new developments on the Town’s northeastern area will likely experience less than ideal response time. Further complicating increased calls to the northeast is the Department’s current level of staffing where four responders are on duty at any one time. A call across town removes resources away from other areas of the Town. If a sub-station was developed on the northeast part of town, with an additional engine, ambulance, and crew, the Fire Department would be significantly expanded and Fire Department services to Town citizens would improve.

**Figure 10. Town of Plainville Fire Department: FY11-FY12 Average Activity and Predicted Impact Post-Slot Parlor Expansion**



*Note: For Emergency Medical Services (EMS) calls, 10% to 20% increase estimated, for fire calls 0% to 5% increase estimated, for all other calls, 5% to 10% increase estimated; all estimates based on discussions from survey of nine fire departments chiefs of towns and cities that developed a racino where the fire departments and area population sizes approximated that of the Town of Plainville. Survey conducted by the Town of Plainville’s Fire Chief Joubert and communicated to investigator on May 6, 2013.*



## DATA SOURCES (outside of SRPEDD region)

### 1. LAW ENFORCEMENT STAFFING/PRESENCE

Host Community agreement could provide for a “sub-station” within the slots casino. Host Police Chief can determine the level of staffing needed and paid for “X” casino.

Specific information regarding relationships between State Troopers and Gaming Commission law enforcement personnel can be finalized.

Source: *Public Safety Impact Findings* (for a Category 2 Slots Casino) - (data source: B&S Consulting for proposed 1250 slot license casino in Leominster, MA)

### 2. Operating Slots/Racino

Resort Worlds Casino (Aqueduct) – South Ozone Park, Queens, NY – opened in 2011

“The neighborhoods around the racino have dodged the public safety woes that locals feared,” said Betty Braton, chairwoman of Community Board 10.

“The negative impact the community was most afraid of did not come,” she said.

Read more: <http://www.nydailynews.com/new-york/queens/local-impact-aqueduct-racino-article-1.1193091#ixzz2l2K6o3cC>

### *Do casinos increase the number of drunk drivers on local roads?*

Casinos are known for their fast-paced environments where customers are encouraged to let loose and have a good time. This often means enjoying alcoholic beverages that may be provided complementarily to the customer while gambling or enjoyed at a casino lounge or restaurant. The anecdotal evidence would indicate a connection between an increase in drunk drivers and casinos. Drunken driving arrests were reported to have nearly doubled in Bethlehem, PA, after the Sands Casino Resort opened in 2009 while they have remained consistent in a nearby non-casino county.

In 2009, Norwich, CT, located near two Indian gambling casinos (Foxwoods & Mohegan), reported that DUI arrests had more than doubled since 1992. The towns of Montville and Ledyard also experienced significant increases. Roughly 20 percent of the motorists in Montville, Ledyard and North Stonington arrested for DUI acknowledged to police that their last drink was at a casino. One such motorist was charged with manslaughter in March 2009 for allegedly causing a fatal accident by driving the wrong way on I-395.

In what is considered one of the first empirical studies on the subject, Chad D. Cotti and Douglas M. Walker explored whether there is a link between casino expansion and alcohol-related fatal traffic accidents. They found that in urban areas, casinos actually reduce the rate of DUIs, while the rate for suburban and rural areas increases. They believe the difference may be that in urban areas the shorter driving distances, availability of public transportation, and substitution of gambling for bar-hopping might account for the decreased rate, while the rate increase in less populated areas is caused by the increase in distance driven by alcohol-impaired drivers.

There are several ways in which governments respond to the problem of intoxicated driving. Public education campaigns can make people more aware of the dangers of drunk driving and the severe penalties for it. Strict enforcement and police tactics such as drunk driving check points are also effective. Ensuring that the proprietors of establishments that serve alcoholic beverage properly train their staff on how to detect and handle intoxicated patrons is also necessary to reduce the problem.

### Drunk Driving Fatalities

Many casinos provide their patrons with free alcoholic beverages as long as they are gambling. Indeed, like bars, casinos represent an increasingly popular form of nighttime entertainment. To the extent that alcohol is relatively cheap at many casinos, then one might expect there to be a link between casinos and drunk driving.

There has not been published work that has studied the relationship between casinos and DUI arrests in the United States. However, one study examined casinos and alcohol-related traffic fatalities (“ARFAs”). The 2010 study by Cotti and Walker examined data from 1990 to 2000, a period that covers much of the recent US commercial casino expansion outside of Nevada and New Jersey. Their findings indicate that there is indeed a relationship between the existence of casinos and ARFAs. However, the relationship appears to be related to miles driven. In short, the study finds that ARFAs increase by 9.2 percent for casino counties with patrons do not have to drive as far, and they often have alternatives to driving, such as taking a cab, bus, or other public transportation. In addition, the authors suggest that urban casinos may serve as a substitute for bars and nightclubs, at which the average patron may consume more alcohol than at casinos

### First Responder Services

The impact of *non-criminal* demands on local law enforcement and other first responders is often overlooked or given secondary consideration in gambling impact studies. What are the impacts from an entertainment venue that operates 24-hours, 7 days a week in terms of additional police and ambulance service calls?

Within the first year after the Horseshoe Casino Cleveland opened in Ohio, the city incurred \$3.1 million in additional expenses related to the police department largely due to increased visitors and activity in its downtown area.<sup>407</sup> According to the *Maryland Gazette*, the creation of a special county police unit for the area was necessary to keep a lid on problems in the vicinity of the new Maryland Live Casino in Hanover.

Spectrum’s Connecticut gambling impact study found that the City of Norwich felt significant impacts from Indian gaming casinos eight miles away. City officials estimated casino-related costs to be anywhere from \$1 million to \$2.5 million a year. They include: A 27 percent increase in motor vehicle accidents from 1991 to 2004. An increase in police overtime from \$85,000 in

1991 to more than \$280,000 in 2008. A 76 percent increase in calls for service from people needing police from 1992 to 2004.

In some communities, local police and fire departments may be required to purchase additional equipment and provide specialized training for their workers. Government may reduce these costs by requiring gambling establishments to share the costs. To minimize the impact on local police, gambling establishments may be required to maintain certain levels of in house security personnel or establish a fee for service arrangement to cover when additional police service may be desired or required. Governments may impose additional tax assessments on gambling establishments to offset additional law enforcement costs.

*Source: Spectrum Gaming Group, October 2013 (NOTE: Spectrum's report was prepared for the State of Florida Legislature).*

#### Lessons Learned (this article is in response to a potential casino in Milford, MA)

In Ledyard, where the town had no say in the casino, Mayor John Rodolico said the relationship between the casino and town is just starting to get on good terms.

Montville Mayor Ronald McDaniel said there have been very few negative effects from Mohegan Sun, which he noted “learned many lessons” from how Foxwoods opened.

Bob Steel, a former congressman who represented eastern Connecticut, said the entire region changed when casinos came to the area.

“They are an overwhelming presence in the area,” Steel said. “From traffic to schools being concerned about a gambling culture, I think it runs the whole gamut.”

Overall, these Connecticut towns had a much different experience than Milford will likely see because their casinos were built on tribal land.

Neither town gained much revenue from the developments since tribal land is tax-exempt and no host agreement was required. Also, the state divvies up the 25 percent of the slot machine revenue it receives from the casinos among all the cities and towns across the state, regardless of proximity to the casinos.

While officials in the host and surrounding towns acknowledged many negative effects to their communities, most also said there could be big benefits if Milford plays their cards right.

There are a variety of areas where, whether Connecticut officials had a positive or negative feeling about the casinos, everyone agreed there have been major impacts.

## Traffic

“The most immediate effect was the increase of traffic on (Ledyard’s) roads,” Rodolico, the mayor, said. “They’ve had tens of thousands of people going there from the day they opened.”

While the majority of the traffic runs through ramps created specifically for the casinos, Rodolico said they still see an impact on their local roads.

Norwich, located about 8 miles from the casinos, has seen many effects from them and, according to a 2009 casino impact study done by the state, has seen an estimated \$1 million to \$2.5 million a year in casino-related expenses.

Along with the increased traffic comes more pressure on the police and ambulance services in the area.

“Our police force has expanded by about 25 percent since the casinos opened, which is directly a result of increased traffic,” said Rodolico.

He also noted that before the casinos opened, the city ambulance service was running about 300 responses a year and ambulances would last for 15 to 20 years. Now, the ambulance service responds to upwards of 1,000 calls a year and the life expectancy of ambulances has gone down by about a third

You can think of a casino as a small city,” said Connecticut State Police spokesman Lt. Jay Paul Vance. “Everything you experience in a small city is what we experience at the casinos.”

Vance said they see everything from minor thefts and assaults to money laundering and counterfeit bills.

“Interesting enough, it’s not overwhelming,” Vance said. “When you look at the thousands of people going in and out every day and see a handful of crimes.”

Vance did note a spike in drunk driving arrests and crashes since the casinos opened.

Source: March 24, 2013 Metrowest Daily News Article “Lesson from Connecticut Casino Experience.”

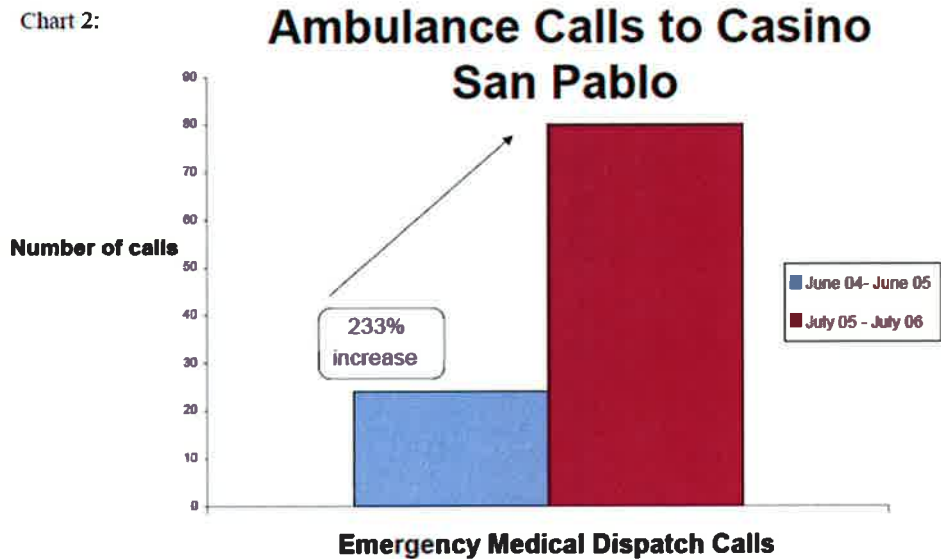
## Emergency Responses at Casino - (Lytton San Pablo Slot Casino located in San Pablo, CA)

Police, Fire and EMS responses **increased** after the installation of the slot machines (2004-2006).

Emergency calls increased from 203 in 2004 to 895 in 2006. Ambulance calls increased from 24 in 2004 to 80 in 2006.

Increases in Emergency Calls to the Casino: 341%

Increases in Ambulance Calls to the Casino: 233%



Source: Gambling with Our Future: Casino San Pablo’s Impact on Local Communities One Year after the Introduction of Slot Machines. Report prepared by The East Bay Coalition Against Urban Casinos, 2006.

## **D. ENF ANALYSIS**

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The ENF indicates thru the northern portion of the site is located within the Hockomock Swamp ACEC. The Hockomock Swamp is the largest freshwater swamp in Massachusetts, and comprises approximately 17,000 acres in Easton, Bridgewater, Norton, Raynham, Taunton, and West Bridgewater. The wetlands in this area act as a large reservoir and serve as the headwaters for the Town River, which flows into the Taunton River. The wetlands and floodplains are hydrologically connected, with an extensive underlying system of medium- and high-yield aquifers. According to the ENF, the project will be designed to improve the existing condition of the site located within the ACEC, including restoring native vegetation and providing significant improvement to the storm water quality that is discharged to the ACEC. The DEIR should specifically address how improvements in stormwater quality will benefit the ACEC.

## **E. CONSULTANT ANALYSIS**

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### **LYNN D. SWEET CONSULTING GROUP**

This letter is in connection with the proposed Category 2 gaming facility with 1,250 slots and 175,000 square feet of gaming floor area in Raynham, MA (the “Subject Property”) and the Southeastern Regional Planning and Economic Development District (“SRPEDD”) “Impact Analysis” and the Old Colony Planning Council (“Old Colony”) “Technical Analysis”. You have asked us to take a brief look at information in these documents discussing potential housing impacts on the potential surrounding communities.

#### **Methodology**

We have reviewed the Host Community Agreement, the portion of the gaming legislation related to Surrounding Communities, SPREDD “Raynham Park Impact Analysis: Surrounding Communities” dated November 5, 2013 and the Old Colony “Technical Analysis of Proposed Raynham Park Slot Parlor” dated October 23, 2013 and proposed FTE’s. We have also contacted industry experts. We ran Census ACS reports and Esri reports.

#### **Conclusion**

We find that it cannot be determined from the submitted materials and our independent evaluation that the communities surrounding Raynham will be significantly and adversely affected by the operation of the gaming establishment after its opening due to housing impacts resulting from the facility.

#### **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.

We were provided with a FTE analysis that shows there will be 400-600 jobs created by the new Slots Parlor. In addition, the host agreement states that they will give preference to employees who previously worked at the Raynham dog track.

The SRPEDD document concludes that the impact of jobs and housing associated with the slot parlor on surrounding communities is expected to be negligible. They go on to cite vacancy rates and unemployment rates for the area.

The SRPEDD document examined vacant units in a 20 mile radius around the site and concluded that it seems unlikely that there would be a major housing impact associated with a slots parlor on the surrounding communities.

As a means of checking on their data, we looked at current information available from the Massachusetts Department of Workforce and Labor Development as show in Table 1 below. This table shows that Raynham as of August 2013 has a 7.1% unemployment rate and Taunton, the community directly south of Raynham 7.6%. In addition, for both communities there are approximately 2,848 job seekers.

**Table 1**

Unemployment-Past 10 Years				Unemployment-Past 10 Years			
Raynham				Taunton			
Year	Labor Force	Employed	Unemployed	Year	Labor Force	Employed	Unemployed
2013*	7,726	7,180	546	2013*	30,322	28,020	2,302
2012	7,759	7,282	477	2012	30,793	28,415	2,378
2011	7,873	7,304	569	2011	31,153	28,500	2,653
2010	7,847	7,228	619	2010	31,158	28,207	2,951
2009	7,978	7,354	624	2009	31,251	28,291	2,960
2008	8,060	7,648	412	2008	31,306	29,355	1,951
2007	8,034	7,701	333	2007	31,013	29,436	1,577
2006	7,981	7,648	333	2006	31,000	29,336	1,664
2005	7,791	7,462	329	2005	30,645	29,068	1,577
2004	7,602	7,237	365	2004	30,439	28,756	1,683
2003	7,216	6,854	362	2003	30,840	29,012	1,828

**\*Period through August 2013**

Table 2 compares housing vacancy rates for Raynham and Taunton as of the 2007-2011 ACS. Therefore, looking at these two communities alone, there are 2,290 housing units that could be absorbed in the event workers do move to the area to work at the Subject Property.

**Table 2**

Housing Occupancy & Vacancy				
	Raynham		Taunton	
	Number	Percent	Number	Percent
<b>Total housing units</b>	5,025		23,803	
<b>Occupied housing units</b>	4,739	94.31%	21,799	91.58%
<b>Vacant Units</b>	286	5.69%	2,004	8.42%



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**

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### **2-32**

The core usage of the Parx Raynham facility will be as a slot parlor. It will operate year round, 24 hours a day. In addition to the slot parlor, the facility will contain multiple bars and restaurants as well as an entertainment venue. The venue will have a full schedule of entertainment with a mixture of larger acts as well as a regular schedule of smaller acts meant to provide reasons for our guests to visit. The restaurants will include a sports bar that will become a main destination in the area for people to have fun and watch a game. We will also have a high end restaurant as well as another name brand casual venue. The goal will be to always have reasons in addition to the slot floor for our guests and visitors to the area to visit Parx Raynham. Given this usage for the facility, we do not expect to see a significant seasonality. Our experience in Pennsylvania supports this expectation.

### **3.2**

Raynham Park plans to employ 804 persons (460 full-time employees and 344 part-time employees) in its permanent facility and 603 persons (348 full-time employees and 255 part-time employees) in its temporary facility. The full-time employees will receive a full package of benefits. Raynham Park has assured that it will provide a high number of quality jobs in the gaming establishment by developing estimated wage levels for the various positions in the gaming establishment. The average wage level for salaried employees in the gaming operations is projected at approximately \$80,000.00. The average wage level for hourly employees in gaming operations is projected to be approximately \$27,000.00, with some of these employees eligible for tips.

### **3.4**

Raynham Park will make contact with all appropriate local, state and federal agencies in the surrounding areas to lay out the jobs available and qualifications required so that they in turn can start making plans to search their databases for unemployed and underemployed candidates. Raynham Park envisions that this would include the labor and workforce development section of the Massachusetts Government and the network of One-Stop Career Centers located throughout the Commonwealth. Furthermore, as indicated in the response to 3-03-01, Raynham Park has an MOU with M.C.C.T.I. to coordinate with the Institute in its attempts to attract qualified unemployed and underemployed persons. Finally, Raynham Park intends to provide specific attention to prior employees of the greyhound track which operated previously at the Raynham Park site and hire back as many of these former employees, including unemployed and underemployed, as possible.

### **3.6**

If Raynham Park is awarded a final Category 2 gaming license, Raynham Park and its contractors will work closely with the Town of Raynham to provide preference for the

employment of town residents and former employees of the now closed Raynham Greyhound Track in the construction and operational phases of the gaming establishment. Prior to the construction and operations phase of the project, Raynham Park will hold a job fair for residents at which it will publicize its employment needs and explain its hiring processes. In addition, Raynham Park will make a good faith effort to use local vendors where cost and quality of goods and services are competitive. Raynham Park will advertise and work with the Taunton Area Chamber of Commerce to promote opportunities for local businesses. Raynham Park will also utilize union labor in the construction of the gaming establishment and will make periodic compliance reports to the Town of Raynham. In regards to work force development utilizing local residents, the MGC can be assured that Greenwood Racing has a record that is second to none. Overall, Raynham Park will meet or exceed the local hiring record of Greenwood Racing in Pennsylvania with 80% of its employees residing within 15 miles and 65% within 10 miles of the gaming facility.

#### **4-26**

Raynham Park's facility is surrounded by surface parking which will assure more than adequate patron parking for the various phases of casino development. The proposed project will utilize existing paved parking areas, but will improve layout, circulation, and pedestrian access from the parking areas to the building. Parking in all phases of development is distributed around the facility providing convenient access for patrons and employees to the multiple entries of the facility.

#### **4-30**

The casino is positioned in the center of the site and located over 800 feet from potential adjacent development south or east of the site. Perimeter activity is limited to vehicular circulation or parking. The northern and eastern edges of the site are bounded by natural preserve and cannot be developed. Site lighting will include light cutoffs at perimeter edging of the site.

#### **4-35**

The North Raynham Water District maintains the Town of Raynham's water system. Several wells provide water and it is stored in a tank in North Raynham. Arrowhead Lane Water Filtration Plant treats the water prior to distribution. The existing capacity of the municipal system appears adequate. The impact of the proposed facility's water usage results in the following upgrades: the existing water pit will be removed and the six inch water line will be replaced with a new ten inch water service throughout the site. In addition, a new ten inch fire protection water service will be constructed to provide water for the building's fire protection system and hydrants at the site.

### **5.1**

The research and design completed for the Project Site have not identified any costs that would be incurred by the Host Community of Raynham for either construction or operation of the gaming establishment. Any mitigation for traffic, utilities, etc. that is required to support the

project will be paid for by Raynham Park under the Host Community Agreement. As to the surrounding community of Easton, Raynham Park is currently in negotiations with Easton for a surrounding community agreement, but it is not expected that Easton will bear any infrastructure costs

#### **5-2**

Raynham Park has commissioned the preparation of three studies; 1) Nearby Communities Impact Report; 2) Environmental Notification Form; and 3) Traffic Impact Study to address the impacts and costs to the host community, surrounding communities, and the Commonwealth. Overall, Raynham Park will fund all casino impacts identified by the ENF or the Nearby Communities Impact Report and it is not expected that any casino impacts will result in any costs to either Raynham or Easton. Furthermore, no additional costs or impacts have been identified for the Commonwealth.

#### **5-15**

The Nearby Communities Impact Report prepared for Raynham Park concluded that the Town of Easton was the only “surrounding community” to the Project. Nevertheless, despite the findings of the Report, Raynham Park has also determined to designate the Town of Taunton as a “surrounding community.” Raynham Park has formally designated the Towns of Easton and Taunton as “surrounding communities” pursuant to Notices of Designation sent to both Towns on October 2, 2013 (5-15-01 and 5-15-02). Raynham Park has discussed and met with both Towns regarding the terms of a surrounding community agreement, and has held one formal negotiation session with each Town. While progress has been made with both, no agreement has been reached to date with either Town and Raynham Park plans to continue negotiations with both Towns following submission of its RFA-2 Application.

#### **5-16**

Raynham Park has not declined any nearby community which has requested a surrounding community agreement or sought to discuss its status as a potential surrounding community. Raynham Park has been contacted in one form or another by the following nearby communities:

- 1) Bridgewater
- 2) West Bridgewater
- 3) Middleborough
- 4) Lakeville
- 5) Dighton
- 6) Norton
- 7) Rehoboth
- 8) Berkley

In all cases, except Berkley, Raynham Park has met with each Town. In some cases, the Town has asked for information which will be provided as soon as possible. In other cases, the discussions were just exploratory. In a few cases, potential terms were discussed. In each case,

Raynham Park plans to follow up and continue discussions or negotiations after the RFA-2 Application is submitted to the Commission.

**5-17**

The impact and mitigation steps required by Raynham Park pertaining to the town of Raynham are established through the Host Community Agreement and the Traffic Impact Study. As to the surrounding community of Easton, Raynham Park is currently in negotiations with Easton for a surrounding community agreement which, when finalized, will address required Raynham Park impact and mitigation issues.

**5-23**

Raynham Park plans to make the following information accessible to those persons affected by problem gambling: (i) a list of problem gambling treatment providers; (ii) a directory of Gamblers Anonymous Massachusetts (or similar group) meetings and/or locations; and (iii) a directory of GAM-ANON Massachusetts meetings and/or locations. Besides the preceding treatment information, the Company plans to create and display Responsible Gaming brochures, Compulsive and Problem Gambling brochures and Self-Exclusion Program brochures.

**5-31**

Raynham Park plans to coordinate with local treatment providers and other vital stakeholders, especially the Massachusetts Council on Compulsive Gambling, regarding available treatment options. Raynham Park will also consult with local providers regarding the content, guidelines and advice in its Responsible Gaming brochures, Problem Gambling Procedures and Self Exclusion brochures. After coordinating with the local providers, Raynham Park will ensure that its staff is intensively trained regarding the available treatment options and the myriad of ways to seek assistance from local providers.

**5-36**

Based on its location, Raynham Park Casino is expected to have no discernible negative impacts on the housing stock in the Town of Raynham and the nearby communities. The casino site is considerably removed from residential areas and supported by excellent transportation infrastructure. Far from creating any negative impacts, the housing stock and home values surrounding Raynham Park should benefit from the proposed casino and entertainment facility and the over 800 quality jobs it will bring to the area.

**5-37**

Raynham Park will have no meaningful impact on surrounding school populations. Since nearly all of new jobs created by the project will be held by existing residents, Raynham Park will not produce any material influx of new school age children into the surrounding vicinity. Likewise, Raynham Park will have no impact on local schools, religious facilities, or public fields or parks, as no such locales are within a reasonable proximity of the facility's site.

**5-37.01**

Raynham Park will have no meaningful impact on surrounding school populations. While Raynham Park will create over 800 new jobs as part of its project, Raynham Park is committed to filling those jobs with local residents, beginning with those residents who formerly worked for Raynham Greyhound Racetrack but lost their jobs after state law banned dog racing. Since nearly all of the new jobs will be held by existing residents, Raynham Park will not produce any material influx of new school age children into the surrounding vicinity. Likewise, Raynham Park will have no impact on local schools, religious facilities, or public fields or parks, or the activities that take place at such locales, as no such places are within a reasonable proximity of the facility's site.

## **G. OTHER**

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### **NITSCH ENGINEERING REPORT**

The proposed project will be serviced primarily by the Town of Raynham municipal services and the Proponent will continue to work with Raynham throughout the licensing and permitting process.

#### **Summary of Findings – Municipal Services**

The following municipal services were reviewed for potential impacts on nearby communities: public safety (Police and Fire), Regional Water and Sewer Systems, Regional Stormwater Management, the housing market, retail, entertainment and service establishments, and social services. Once the Proponent receives input from nearby communities, this list will be updated.

##### *Police and Fire Service (Public Safety)*

The site will be serviced primarily by Town of Raynham Police and Fire for response to a call at the facility. As part of the traffic study, an analysis was performed to determine response times to the site (see figure below). This information is being used in the on-going discussions with the Town of Raynham.

The Site is currently a gaming operation facility featuring simulcast racing and has both food and alcohol services. The proposed project will maintain the simulcast racing and add slots, plus expand food and alcohol services and add an entertainment venue (Phase 2). Based on the Town of Raynham's experience with the Site when it was a fully functioning Dog Track with similar uses, there is not anticipated to be a significant impact on the public safety departments in nearby communities.

##### *Municipal and Regional Water and Sewer Systems*

The Site is currently serviced by the North Raynham Water District's water and Town of Raynham's sanitary sewer systems. The North Raynham Water District owns and operates its own public wells which are permitted by MA DEP. The Proponent is meeting with the District and will continue during the licensing process.

The proposed project is pursuing LEED certification. In order to comply with LEED credits, the Project will use low-flow water fixtures which will reduce future sanitary flows compared to current fixtures at the existing facility.

The Raynham Sewer Department operates and maintains the sewer collection system and pumps. The Site is serviced by a private on-site sanitary sewerage pump station that discharges to a municipal pump station across Route 138 from the Site. Both of these pump stations are new and were installed 7 to 8 years ago. The Town of Raynham has an intermunicipality agreement with the City of Taunton; under this agreement, the Town of Raynham's sewer collection system discharges to the Wastewater Treatment facility owned and operated by the City of Taunton.

The Site currently has a permit to discharge 23,000 gallons per day to the Raynham sewer collection system. The Proponent is currently discussing the existing permitted flows versus the proposed flows, and how the Phasing of the project may impact the City's available allotments within their agreement with Taunton. See Table 3-1 for design flows based on Title 5.

Title 5 flows are inherently conservative and actual flows are anticipated to be significantly lower. The Proponent will continue to work with the Town of Raynham regarding design flows versus actual flows, as well as the potential impacts on the sewer collection system and municipal pumps. At this time, it is anticipated that the Town of Raynham has sewer capacity for flows through Phase 2.

#### *Stormwater Management*

The Site's stormwater runoff currently discharges into the Hockomock Swamp substantially unmitigated and untreated. The Hockomock Swamp is an ACEC and will require a higher level of stormwater quality treatment of the stormwater runoff prior to discharge. The Project will meet all requirements of the MassDEP Stormwater Management Standards and will strive to provide a net positive impact on the receiving Hockomock Swamp.

The proposed project will reduce the impervious surfaces on site by approximately 17.8 acres (or 28%). There is a substantial reduction of impervious surfaces within the Riverfront and within the Buffer Zone to the Hockomock Swamp. The reduction of the impervious surfaces will reduce the quantity of runoff flowing to Hockomock Swamp. In addition to upgrading the drainage collection system to current standards, a series of gravel wetlands will be constructed along Hockomock Swamp to provide water quality treatment and some additional stormwater quantity mitigation. A 50-foot vegetated buffer will also be added along the Hockomock Swamp. This proposed stormwater management system is a substantial improvement over the existing conditions and will improve the water quality of the runoff from the Site.

#### *Housing Market*

Based on the history of the Site, the size of the Project and the Site's proximity to residential neighborhoods in nearby communities, there will be minimal negative impacts to the housing market in the nearby communities.



### *Retail, Entertainment, and Service Establishments*

The impact of the Project on the retail, entertainment, and service establishments is anticipated to enhance local businesses. Parx casino in Bensalem, PA has spawned the growth of the restaurant business along the major corridor on which the casino is located, as discussed below, and similar development is expected for Raynham.

Prior to the opening of Parx in December 2006, there were claims by some that the casino would take business away from local small businesses, like restaurants and shops, in the surrounding area, as had been experienced when casinos opened in Atlantic City. However, the experience has been the opposite of what was feared for Bensalem and experienced in Atlantic City. Since Parx opened in 2006, small businesses in the surrounding area and along Street Road have flourished. Township officials have advised often of the reports they have received from existing restaurants of significant increases in business volumes, and many new restaurants have opened in the wake of the casino's opening. In addition, since the casino's opening in December 2006, approximately 48% of its total spend (or approximately \$550 million) has been spent by Parx with local businesses for construction services and for operational goods and services. Through its community development office, Parx continues to conduct outreach efforts to local businesses in an effort to increase the volume of business awarded to small and local contractors and vendors.

### *Social Services*

As noted earlier during the discussion of impacts to Police & Fire Services, the proposed operation will be similar to when the Site was a fully functioning Dog Track with similar uses. Based on the past use of the site and the proposed use of the Site, an increase in the demand for social services is not anticipated in the nearby communities.

### Summary of Mitigation – Municipal Services

The following actions are proposed to mitigate the potential impacts to the municipal services of nearby communities:

- The Proponent is working with Town of Raynham to ensure that adequate Public Safety and Social Services resources will be dedicated to the Project Site to minimize reliance on Police and Fire in Easton.
- Based on the substantial improvement in water quality and quantity reduction, the project will substantially reduce the Site's impact on the Hockomock Swamp and therefore mitigate any potential impacts on nearby communities within the designated ACEC.

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## **5. OTHER**

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### **Legal Framework**

The community will be significantly and adversely affected by any other relevant potential impacts that the commission considers appropriate for evaluation based on its review of the entire application for the gaming establishment. 205 CMR 125.01(2)(b)(5)

### **Executive Summary**

n/a

**A. COMMUNITY PETITION**

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Education. Our critical concern, and one not contemplated by the Expanded Gaming Act and its regulations, is the potential impact on Bridgewater's shared regional school district. While we anticipate additional student enrollment from Bridgewater since Bridgewater's housing costs are less than our partner Raynham, we are most concerned about the impact to education of such large payments to Raynham under the Host Community Agreement.

With an additional \$1 million of unrestricted funds, Raynham has the ability to inflate its contribution to the regional district. While this is not necessarily a bad thing, I am concerned that such a move could negatively impact the educational opportunities available to Bridgewater children and have a significant economic impact upon the Town of Bridgewater. With an infusion of funds to Raynham and no funds to Bridgewater, the greater likelihood is that Raynham will seek to dissolve the Regional School District and Bridgewater will lose the benefits of being a member of a Regional School District without having the financial ability to address such a loss.

**B. APPLICANT RESPONSE**

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None

**C. RPA ANALYSIS**

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None

**D. ENF ANALYSIS**

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None

**E. CONSULTANT ANALYSIS**

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None

## **F. APPLICATION**

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### **4.26**

4.26 Raynham Park's facility is surrounded by surface parking which will assure more than adequate patron parking for the various phases of casino development. The proposed project will utilize existing paved parking areas, but will improve layout, circulation, and pedestrian access from the parking areas to the building. Parking in all phases of development is distributed around the facility providing convenient access for patrons and employees to the multiple entries of the facility.

### **4.35**

The North Raynham Water District maintains the Town of Raynham's water system. Several wells provide water and it is stored in a tank in North Raynham. Arrowhead Lane Water Filtration Plant treats the water prior to distribution. The existing capacity of the municipal system appears adequate. The impact of the proposed facility's water usage results in the following upgrades: the existing water pit will be removed and the six inch water line will be replaced with a new ten inch water service throughout the site. In addition, a new ten inch fire protection water service will be constructed to provide water for the building's fire protection system and hydrants at the site.

## **G. OTHER**

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### **NITSCH ENGINEERING REPORT**

This section provides an overview of issues that may not fall within previously defined categories.

#### Local Cultural Institutions

There are many cultural institutions in Massachusetts but none are located in the vicinity of the Project that would be impacted.

#### Area of Critical Environmental Concern

A review of the Massachusetts Geographic Information System (MassGIS) dated April 2009, indicates that the northern portion of the Site is located within the Hockomock Swamp ACEC. The Hockomock Swamp is the largest freshwater swamp in Massachusetts and comprises approximately 17,000 acres in Easton, Bridgewater, Norton, Raynham, Taunton, and West Bridgewater. This area also contains the FEMA 100-year floodplain and NHESP Priority Habitat for Rare Species, and is considered a critical area under the MassDEP Stormwater Management Standards. The Project will be designed to improve the existing condition of the site located within the ACEC, including restoration with native vegetation and a significant improvement to the stormwater quality being discharged to the ACEC. Based on the proposed stormwater management system improvements, there will not be an impact on the nearby communities within the ACEC.

#### FEMA Flood Zone

Based on the Flood Insurance Rate Maps for the Towns of Easton, Raynham, and Taunton (Community Panel Numbers 250053, 250061, and 2500066, respectively), the 100-year flood zone (Zone A) encroaches on the northern portion of the Site. The Zone A is considered Bordering Land Subject to Flooding under the Massachusetts Wetland Protection Act. The existing flood storage capacity will be maintained or appropriate compensation provided as required by regulations; there will not be an impact on the nearby communities.

#### Natural Heritage and Endangered Species Program

A review of the 13th Edition of the Massachusetts Natural Heritage Atlas prepared by the Natural Heritage and Endangered Species Program (NHESP), dated October 1, 2008, indicates that the northern portion of the Site is located within a Priority Habitat of Rare Species (PH 1392). The area within the habitat area is previously developed. The area closest to the Hockomock Swamp and within the Buffer Zone that is currently developed will be restored. In addition, the proposed gravel wetlands along the northerly limits of the development will extend the vegetated border. Since no work is being performed outside of previously developed areas,

there will be no impact to the habitat – in fact there will be an improvement. There will be no impact on the nearby communities.

#### Major Watersheds

The Site is located within the Taunton River Watershed. Massachusetts Department of Environmental Protection (MassDEP) and the Environmental Protection Agency (EPA) issued the Final Pathogen Total Maximum Daily Load (TMDL) for the Taunton River Watershed in June 2011. The TMDL is a “pollution budget” that identifies the sources of pathogens from direct and indirect discharges, determines the maximum amount of the pollutant that can be discharged to the Taunton River to meet water quality standards, and assigns pollutant load allocations to the sources. The Project includes pollutant reductions measures that are outlined in the TMDL, particularly for stormwater treatment and source control measures. Based on the proposed stormwater management system improvements, there will not be an impact on the nearby communities within the Taunton Watershed.

**NOVEMBER 14, 2013 – COMMUNITY COMMENTS AT PUBLIC MEETING**

21 Number four, the town of Bridgewater  
22 and the town of Raynham share a regional  
school  
23 district. A slots facility could be the single  
24 most important impact to Bridgewater for two  
1 reasons. One, a slots employee with children  
2 moving to the town of Bridgewater where homes  
3 are generally less expensive than Raynham will  
4 increase our assessment. That's the simple  
5 calculation.  
6 Second, the host community  
7 agreement, which has been approved by the  
8 voters in Raynham, will add \$1 million in  
9 unrestricted revenue to the town of Raynham.  
10 Added to the expected increase in property tax  
11 value, Raynham could conceivably have an  
12 additional \$2 million a year to devote the  
13 regional school district.  
14 While there is certainly nothing  
15 wrong with devoting resources to education, we  
16 are concerned that the new and sudden supply  
of  
17 unrestricted revenue will place Bridgewater at  
18 a distinct disadvantage including the  
19 possibility that the district would in fact  
20 break apart.  
21 We do not believe it was the intent  
22 of the Gaming Act to put communities in this  
23 position. In fact, we do not believe the issue  
24 of shared regional school districts was ever  
1 contemplated during the Act's drafting.  
2 However, it is the undeniable consequence,  
3 which could be addressed by a surrounding  
4 community agreement.  
5 I must acknowledge to the Commission  
6 that the applicant has receptive to discussing  
7 a nearby community agreement and has reached  
8 out to Bridgewater on a number of occasions.  
9 And we've had a number of sessions with them,  
10 albeit brief.  
11 And we are appreciative of these  
12 overtures, but we are firmly convinced that the  
13 residents of Bridgewater are more protected  
14 from any future impacts by being designated a  
15 surrounding community by the applicant or the  
16 Gaming Commission.

17 As I mentioned earlier, all of the  
18 other abutting communities have been  
designated  
19 and we are perplexed why we, the community  
that  
20 bears 60 percent of the cost of the regional  
21 school district we share with the host  
22 community, why we would not be among those  
23 designated towns.  
24 So, I thank you very much for your  
1 time and your consideration and the time you  
2 put into what's obviously a time-consuming and  
3 difficult job. I don't envy the Commission at  
4 all. Thank you and I'm happy to answer any  
5 questions.  
6 CHAIRMAN CROSBY: Run the school  
7 district by me again. Why might the -- First  
8 of all, is there something in the host  
9 community agreement with Raynham that  
specifies  
10 money going to the consolidated school  
11 district?  
12 MR. DUTTON: No, quite the opposite.  
13 There's unrestricted, a \$1 million unrestricted  
14 payment to the town of Raynham that's  
included  
15 in the host agreement.  
16 Our feeling is that that money, any  
17 additional what I call unrestricted monies  
18 going into the host community, more power to  
19 the host communities. But it will put  
20 increasing pressure on our town, Bridgewater,  
21 who is a member of the regional school  
22 district, the two-town regional school  
23 district. It will put more pressure on our  
24 budget to match the available money that  
1 Raynham has to spend on their education.  
2 CHAIRMAN CROSBY: How does that  
3 work? Are you forced on a pro-rata basis to  
4 match all the money they put up?  
5 MR. DUTTON: Not necessarily forced  
6 on a pro rata basis, but certainly if the  
7 school committee votes a budget that is much  
8 larger than the current budget, primarily  
9 because Raynham can afford to pay that extra  
10 assessment, it will put pressure on Bridgewater

11 to try to match and to afford the additional  
 12 assessment that we would see.  
 13 COMMISSIONER MCHUGH: Are you paying  
 14 equal amounts now?  
 15 MR. DUTTON: It's not exactly equal.  
 16 I won't try to explain the educational funding  
 17 formula. That would be a disaster, but roughly  
 18 60 percent of the regional budget is what we  
 19 pay right now. Raynham pays roughly 40  
 percent  
 20 and that is in turn about 60 percent of our  
 21 total budget.  
 22 CHAIRMAN CROSBY: I'm sorry,  
 23 Bridgewater pays what percent of the regional  
 24 budget?  
 1 MR. DUTTON: About 60 percent.  
 2 CHAIRMAN CROSBY: What is the makeup  
 3 of the school committee?  
 4 MR. DUTTON: The makeup of the  
 5 school committee is roughly equal members  
 from  
 6 Bridgewater and Raynham. They are voted, I  
 7 believe, at-large.  
 8 COMMISSIONER MCHUGH: What is the

9 student population percentage?  
 10 MR. DUTTON: Percentage split is  
 11 roughly 60/40.  
 12 COMMISSIONER ZUNIGA: This is a  
 13 district regional at the high school level  
 14 only, correct?  
 15 MR. DUTTON: The district is  
 16 regional, entire region, all of the schools K-  
 17 12.  
 18 COMMISSIONER ZUNIGA: But this  
 19 dynamic of a breaking apart has been going on  
 20 in that region for a while, it's not new.  
 21 MR. DUTTON: It's not a new concept.  
 22 Our fear is that this could be the impetus to  
 23 actually break that apart, the financial  
 24 pressure on Bridgewater and more financial  
 1 independence of Raynham could force the  
 2 district to fall apart.  
 3 CHAIRMAN CROSBY: That's a creative  
 4 approach, which is not to pass judgment at all  
 5 on the pros or cons of it. Any other  
 6 questions?

### **NOVEMBER 14, 2013 – COMMUNITY COMMENTS AT PUBLIC MEETING**

4 MS. LEE: Good morning,  
 5 Commissioners. For the record there is  
 6 actually three of us Grace Lee for the  
 7 applicant. I have with me General Counsel for  
 8 Greenwood Entertainment and Racing, Tom  
 Bonner.  
 9 And then with me also is Tom Carney part of the  
 10 Carney Group.  
 11 I'm going to actually hand it over  
 12 to Mr. Bonner. He's been working with Tom  
 and  
 13 I in reaching out to all of the communities.  
 14 And he'll be able to give you -- If there are  
 15 no questions right now, I am going to have Mr.  
 16 Bonner give you an update of what we've done  
 17 and how we've approached this.  
 18 MR. BONEER: Thank you, Grace. Good  
 19 morning, Mr. Chairman, good morning,  
 20 Commissioners. I am a big fan of brief  
 21 presentations, but Mr. Ritter set the bar  
 22 extremely high. I don't think I can match his,

23 but we will be brief.  
 24 One of the things that I'd like to  
 1 emphasize to the Commission is that we  
 2 understand the significance of this process.  
 3 We've addressed it as a collaborative process.  
 4 We've included the communities in our meetings  
 5 that we've had.  
 6 One of the reasons that I think  
 7 we've been able to demonstrate an interest in  
 8 and a concern for this project is the  
 9 participation of the Carney family in our  
 10 project. These neighboring towns know the  
 11 Carney family. They know the operation. They  
 12 know what the Carney family businesses have  
 13 meant over the years. And I think that there's  
 14 a certain level of comfort that comes from  
 15 dealing with a known entity and quantity. So,  
 16 we are glad that they have been able to be a  
 17 part of the process.  
 18 The big picture, we have 11 towns



19 with whom we have had various  
communications.  
20 We've had one meeting with some towns. We  
have  
21 had four meetings with some towns. I have a  
22 meeting at 2:00 today with Grace and Tom  
Carney  
23 to meet with another town. So, we devoted our  
24 full effort to this once we got the October 4  
1 application behind us.  
2 We've designated four towns to date  
3 of the 11, Easton, Taunton, West Bridgewater  
4 and we just designated Middleboro on Monday.  
5 We have an executed surrounding community  
6 agreement with Taunton.  
7 That leaves five petitioners.  
8 Middleboro had petitioned you for recognition.  
9 But in the interim, we did recognize them. So,  
10 there's five towns that have petitioned the  
11 Commission for recognition. They are  
Berkeley,  
12 Dighton, Bridgewater, Rehoboth and Lakeville.  
13 You heard from Rehoboth, Bridgewater and  
14 Lakeville today. You know the status from the  
15 comments that were made today.  
16 With respect to Berkeley, we have  
17 been in detailed discussions about the  
18 possibility of Berkeley executing a nearby  
19 community agreement as distinguished from a  
20 surrounding community agreement. I am  
21 optimistic that we'll be able to report next  
22 week that we've reached an agreement with  
them.  
23 So, if we're successful with  
24 Berkeley and Lakeville as was just indicated,  
1 we'll knock another two off the list. The  
2 point is we are working hard; we're making  
3 progress. That covers nine.  
4 The other two towns I haven't  
5 addressed, Norton and Stoughton. Stoughton did  
6 not petition for surrounding community status  
7 because we had prior to the end date signed a  
8 nearby community agreement with Stoughton.  
So,  
9 they are off your radar screen and not to be  
10 worried about.  
11 The only other town with which we've  
12 had communication but no agreement and no

13 petition to you is the town of Norton. They  
14 haven't been back in touch with us. They had  
15 not indicated any interest in meeting with us.  
16 So, I have nothing to report with respect to  
17 Norton.  
18 The summary is there are nine towns  
19 who are either designated or have petitioned  
20 for designation. We have one agreement signed  
21 with one. We hope we are going to have  
22 agreements with two or three others. So, we  
23 are whittling down the list. I'd be happy to  
24 answer any questions that you may have. That's  
1 the summary of where we are. We continue to  
2 work on it.  
3 And knowing your schedule, although  
4 November 21 next week is an important date for  
5 designation, we then have another 30 days to  
6 try to get these deals done in whatever form  
7 these towns may present themselves following  
8 your actions next week.  
9 CHAIRMAN CROSBY: Excuse me. The  
10 accessorizing touch with the pen is a nice one.  
11 Say again where Rehoboth is. What  
12 is the status of Rehoboth?  
13 MR. BONNER: With Rehoboth, we have  
14 met with Rehoboth and have discussed and  
15 submitted to them a proposed nearby  
community  
16 agreement with Rehoboth.  
17 CHAIRMAN CROSBY: Which addresses  
18 this traffic on 44 issue?  
19 MR. BONNER: Yes. Based on  
20 discussions we had with Mr. Ritter, he had  
21 identified that same concern when we met. And  
22 the nearby community agreement that we sent  
to  
23 him addresses that.  
24 By the way, the format of the nearby  
1 community agreement is this wait-and-see  
2 approach. We enter into an agreement now. We  
3 agree that a year or so after opening we will  
4 agree with the town on what things to study.  
5 We will study those items.  
6 We will get that report results. We  
7 will then meet and agree or if we cannot agree,  
8 based on what you said last meeting Mr.  
9 Chairman, I believe that disagreement comes

10 back to the Commission for a decision under  
the  
11 arbitration section of the regulation. That is  
12 the general format of the nearby community  
13 agreement.  
14 CHAIRMAN CROSBY: Thank you.  
15 COMMISSIONER CAMERON: John is  
16 shaking his head no.  
17 MR. ZIEMBA: No.  
18 MS. BLUE: No. The arbitration  
19 provision under our regulations anticipates the  
20 arbitration occurring now to get through a  
21 surrounding community agreement. So, the  
22 applicant is free to agree to that in some form  
23 independently in their own agreement but will  
24 not be the arbitration under our regs.  
1 MS. LEE: Yes, I was going to  
2 correct Counsel. What we put into the nearby  
3 community agreements is the integration of  
4 those provisions to go through the arbitration  
5 process.  
6 I just wanted to back up so that the  
7 Commission understood exactly how we  
approached  
8 this process. We approached this process as  
9 the Carneys have always approached the  
10 surrounding communities and nearby  
communities  
11 as neighbors, just as neighbors.  
12 They've been neighbors with these  
13 communities as a facility for over -- almost  
14 half a decade. They continue to maintain those  
15 great relationships. So, in kind of going  
16 forward with that, Tom and I initially even  
17 before the application, and we were a little  
18 ambitious, before the application was due, we  
19 met with every community that reached out to  
us  
20 regardless of whether we thought they were  
21 significantly impacted, regardless of the legal  
22 analysis. That was subsequently going to have  
23 to be applied by this Commission.  
24 We wanted to understand exactly what  
1 the concern was. We also recognize that they  
2 were going to view the applicant's reports with  
3 a little bit of skepticism. So, we integrated  
4 into these meetings the RPAs, both SRPEDD  
and

5 Old Colony, to make sure that they had all of  
6 the information that we had available. We gave  
7 them access to our information. We wanted to  
8 make sure everybody had a comfort level that  
9 the information was objective.  
10 It is our information, It's  
11 information that we've submitted to MEPA. It  
12 was in our ENF reports. All of that  
13 information was made available per the  
14 regulations to all of these communities as well  
15 as to the RPAs.  
16 After listening to all of the  
17 communities, one of the consistent themes we  
18 heard by everyone around the facility is that  
19 they weren't certain what the impacts were  
20 going to be. And the anxiety was if they  
21 didn't do something then they were going to  
22 waive all of their rights, which is completely  
23 understandable because I think we all sit here  
24 today not certain about what the impacts are  
1 going to be significant, insignificant or  
2 otherwise.  
3 So, we formulated a nearby community  
4 agreement, which basically has the wait-and-see  
5 provision to actually analyze the impacts at  
6 that time. So, that's the approach with that  
7 we've been going forward with. That's the  
8 approach that we've kind of engaged everyone  
9 with. We've relied heavily on the RPAs'  
10 assessments to the extent that when SRPEDD  
11 finished their analysis and came out with  
12 Middleboro being significantly impacted per  
the  
13 regulations, we recognized them as well.  
14 So, this continues to be a  
15 collaborative process. We hope to wrap this up  
16 before the deadlines. And we had hoped that we  
17 could get all of this done before today, but we  
18 are still optimistic that hopefully we will get  
19 it done before the 21st.  
20 COMMISSIONER ZUNIGA: I forget if  
21 you gave this update, Mr. Bonner, but West  
22 Bridgewater. -- I'm sorry. You gave an update  
23 of West Bridgewater, what about Bridgewater?  
24 MR. BONNER: We met with Bridgewater  
1 yesterday. That was the second meeting that we  
2 had had with Bridgewater. We agreed to meet  
3 again next week to continue our discussion with

4 them.  
 5 The issue with Bridgewater is will  
 6 we designate them as a surrounding community.  
 7 We are still working through some of the data  
 8 they presented to us. You heard Mr. Dutton's  
 9 comments today. Taking a little different  
 10 views on traffic flows and where traffic will  
 11 come from, we will take that under advisement.  
 12 We just got that information yesterday.  
 13 It was that kind of information that  
 14 we got from West Bridgewater who we  
 originally  
 15 did not designate that led us to designate  
 16 them. They gave us some additional traffic  
 17 information that we didn't have from our  
 18 studies. So, we have shown we are receptive to  
 19 that information from the towns. And we have  
 20 to review what Bridgewater shared with us  
 21 yesterday.  
 22 CHAIRMAN CROSBY: In your wait-and-

23 see package, how do you anticipate that  
 24 suggestion in the statute that there is a  
 1 weighting of good effects versus negative  
 2 effects?  
 3 MS. LEE: I think in the agreement  
 4 we do take -- there is language in there about  
 5 the net negative impacts. So, the  
 6 contemplation of recognizing positive impacts  
 7 is in there. I can't tell you exactly today  
 8 how it will be quantified, but there is a  
 9 consideration for that.  
 10 CHAIRMAN CROSBY: We are looking for  
 11 some help on how to quantify.  
 12 MR. BONNER: So far, we've put the  
 13 words in the agreement. How we effect them  
 14 remains to be determined.  
 15 CHAIRMAN CROSBY: All right. We'll  
 16 try that too. Anybody else? Thank you.

### **OCTOBER 23, 2013 –PUBLIC INPUT MEETING IN EASTON MA**

MS. OAKES: Good afternoon, Mr.  
 15 Chairman and Commissioner. My name is  
 Helen  
 16 Oakes and I live at 892 South Street in  
 17 Bridgewater. I am also a member of local 580  
 at  
 18 Bridgewater State University with Unite Here. I  
 19 would like to say and put a good word in.  
 20 My husband was a Vietnam veteran who  
 21 lost his life to non-Hodgkin's lymphoma from  
 22 direct contact to Agent Orange. And he's been  
 23 gone seven years. And being a member of Unite  
 24 Here and working for Sodexo at Bridgewater  
 State  
 1 University has been a positive thing for me.

2 I have been one of those that has  
 3 helped to come up with our new increases for our  
 4 workers. I'm still in my home. I'm able to go  
 5 on vacations, even though I miss my husband,  
 but  
 6 yes.  
 7 I think a union is a positive to any  
 8 group of people. And I think if Mr. Carney gets  
 9 his slot machines into Raynham Park, then Unite  
 10 Here would be a good union for him to get  
 11 involved with. We do a lot of positive things  
 12 to help. Unions have a fair wage, healthcare  
 13 and lots of positives. That's it. Thank you.

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## **6. POSITIVE IMPACTS**

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### **Legal Framework**

In determining whether a community is a surrounding community the commission may consider any positive impacts on a community that may result from the development and operation of a gaming establishment. 205 CMR 125.01(2)(c)

### **Executive Summary**

The Applicant's Application includes a description of many positive impacts of the proposed facility including approximately annual tax revenue of \$137,800,000 to the state. The economic impact of the facility statewide will be the creation of nearly 1800 total job opportunities providing nearly \$73 million in annual employee earnings and approximately 800 persons employed from the area at the Facility. Further, it projects to purchase \$38 million annually in regional goods and services. In addition, regional businesses will realize between \$159-192 million per year in revenues.

**A. COMMUNITY PETITION**

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None

**B. APPLICANT RESPONSE**

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None

**C. RPA ANALYSIS**

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None

**D. ENF ANALYSIS**

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None

**E. CONSULTANT ANALYSIS**

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None

**F. APPLICATION**

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None

**G. OTHER**

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Attachments:

- Old Colony Planning Council Memorandum, October 23, 2013, Section 2.1  
Transportation