



Massachusetts Gaming Commission

RFA-2 Application Review

Category 1 License for Casino: Region C—MG&E Brockton

Report to the Commissioners for: Category # 4—Building and Site Design

Commissioner Lloyd Macdonald

April 26, 2016

This page intentionally left blank

Contents

1. Introduction

- Criteria ----- 4
- Rating System ----- 4
- RFA – 2 Category # 4 Question List ----- 5

2. Overall Rating ----- 6

3. Criteria Rating Summary ----- 8

4. Review Detail

- Criterion 1 Demonstrate Creativity in Design and Overall Concept Excellence ----- 12
- Criterion 2 Gaming Establishment of High Caliber with Quality Amenities in Partnership with Local Facilities ----- 15
- Criterion 3 Compatibility with Surroundings ----- 19
- Criterion 4 Utilize Sustainable Development Principles in the Construction and During the Life Cycle of the Facility --- 24
- Criterion 5 Security ----- 28
- Criterion 6 Permitting ----- 30
- Criterion 7 Other ----- 32

5. Appendix

- A. Basis for Evaluation of Architectural Design Quality
- B. Design Memo
- C. Program and Cost Comparisons, MG&E Brockton and MGM Springfield
- D. Sustainability Memo
- E. Transportation Memo
- F. Schedule

1. Introduction

Criteria

- Criterion 1 (Questions 4-1 to 4-9): **Demonstrate Creativity in Design and Overall Concept Excellence**
- Criterion 2 (Questions 4-10 to 4-22): **Gaming Establishment of High Caliber with Quality Amenities in Partnership with Local Facilities**
- Criterion 3 (Questions 4-23 to 4-36): **Compatibility with Surroundings**
- Criterion 4 (Questions 4-37 to 4-59): **Utilize Sustainable Development Principles in Construction and During the Life Cycle of the Facility**
- Criterion 5 (Questions 4-60 to 4-68): **Security**
- Criterion 6 (Questions 4-69 to 4-77): **Permitting**
- Criterion 7 (Questions 4-78 to 4-79): **Other**

Rating System

Color coding and rating explanation

INSUFFICIENT	Failed to present a clear plan to address the topic, or failed to meet the minimum acceptable criteria of the Commission.
SUFFICIENT	Comprehensible and met the minimum acceptable criteria of the Commission; and/or provided the required or requested information.
VERY GOOD	Comprehensive, demonstrates credible experience and plans, and /or excels in some areas.
OUTSTANDING	Uniformly high quality, and demonstrates convincing experience, creative thinking, innovative plans and a substantially unique approach.

Question List

Criterion 1. Demonstrate Creativity in Design and Overall Concept Excellence

- 4-1 Overall Theme
- 4-2 Relationship with Surroundings
- 4-3 Architects, Engineers, and Designers
- 4-4 Color Rendering
- 4-5 Schematic Design
- 4-6 Proposed Landscaping
- 4-7 Alternative Presentation
- 4-8 Parking
- 4-9 Transportation Infrastructure

Criterion 2. Gaming Establishment of High Caliber with Quality Amenities in Partnership with Local Facilities

- 4-10 Gaming
- 4-11 Non-Gaming Amenities
- 4-12 Exhibition Spaces
- 4-13 Conference Space
- 4-14 Serving the Surrounding Community
- 4-15 Entertainment Venues
- 4-16 Public Spaces
- 4-17 Description of Hotel
- 4-18 Other Facilities
- 4-19 Quality of Amenities
- 4-20 Art
- 4-21 Tourism Diversity
- 4-22 Diversified Regional Tourism

Criterion 3. Compatibility with Surroundings

- 4-23 Egress from Gaming Establishment Site
- 4-24 Adequacy of Existing Transportation Infrastructure
- 4-25 Transit Accommodation

- 4-26 Parking Facilities
- 4-27 Adjacent Land
- 4-28 Delivery of Supplies and Trash Removal
- 4-29 Signage
- 4-30 Minimizing Noise and Lighting
- 4-31 Integration with Surrounding Venues
- 4-32 Site Improvements
- 4-33 Stimulating Retail Activity
- 4-34 Extreme Weather
- 4-35 Regional Water Facilities
- 4-36 Sewage Facilities

Criterion 4. Utilize Sustainable Development Principles in the Construction and During the Life Cycle of the Facility

- 4-37 LEED Certification
- 4-38 Compliance with Environmental Standards
- 4-39 Stretch Energy Code
- 4-40 Alternative Fuel Vehicles
- 4-41 Storm Water
- 4-42 Water Conservation
- 4-43 Energy Efficient Equipment
- 4-44 Energy Efficient Gaming Equipment
- 4-45 Lighting
- 4-46 On-Site Energy Generation
- 4-47 Off Site Renewable Energy
- 4-48 Building Envelope and HVAC
- 4-49 Energy Consumption Monitoring
- 4-50 Advanced Building Controls for Energy Use
- 4-51 Centralized Heating and Cooling
- 4-52 Shifting Peak Energy Use

- 4-53 Net Zero Energy
- 4-54 Sustainable Building Construction
- 4-55 Ongoing Sustainable Site Operations
- 4-56 Testing of Clean Energy Technologies
- 4-57 Energy Contracts
- 4-58 Public Education on Clean Energy, Sustainability, and Waste Management
- 4-59 Grid Failure

Criterion 5. Security

- 4-60 Surveillance
- 4-61 Emergency Evacuation
- 4-62 Emergency Response
- 4-63 Regulatory Accommodations
- 4-64 Remote Regulatory Surveillance
- 4-65 Excluding Minors
- 4-66 security of Premises
- 4-67 History of Security
- 4-68 Computerized Accounting and Auditing

Criterion 6. Permitting

- 4-69 Permit Chart
- 4-70 Permit Chart Attachments
- 4-71ENF
- 4-72 EOEEA Certificate (ENF)
- 4-73 EIR
- 4-74 EOEEA Certificate (EIR)
- 4-75 Environmental Assessment, Findings, and Impact Statement
- 4-76 Host Community Zoning
- 4-77Permit Appeals

Criterion 7. Other

- 4-78 Other Uses of Facility
- 4-79 Property Description

2. Overall Rating: Sufficient

Each of the 79 questions which comprise Category 4 roll up were grouped into one of seven Criteria summarized on the following page. In turn, the seven Criteria roll up into this Overall Rating for Category 4, Building & Site Design. All criteria are not created equal. Criteria 1 through 4 are considered most important to Building & Site Design because they establish the critical elements for each applicant's proposal. Criteria 5 and 6 are considered "threshold" criteria necessary for an applicant to realize a compliant development. Criterion 7 contains information related to the site and contingent future uses and provides a basis for the boundary description of the gaming establishment to be included in the license.

MG&E has submitted an Application that is 'sufficient' in almost all respects. Taken as a whole, it is solidly sufficient. There is nothing especially exciting about the proposed casino/hotel, although the exterior design creatively seeks to evoke the look and feel of a New England manufacturing city like Brockton. There are no significant design deficiencies.

MG&E intends the casino to be a regional destination, offering first class gaming, hotel and dining options. In conjunction with the Shaw's Center and Campanelli Stadium, the casino is intended to anchor an entertainment district. The masonry exterior recalls mill buildings and historic properties.

The Gaming Establishment consists of three main elements:

- Casino floor and associated food and beverage (F&B) venues
- Multi-purpose ballroom and associated conference/meeting rooms
- Hotel and spa.

These are well arranged to support the different uses, but the overall design is inward focused from the surrounding community. A potential opportunity is lost or delayed by not incorporating the adjacent historic Brockton Fairgrounds Exhibition Hall in the gaming establishment.

The size of the proposed casino and hotel facility is approximately 466,000 square feet, at an estimated construction cost of approximately \$295,000,000. This cost does not include furnishings, fixtures, gaming equipment or land costs. A cost comparison between MG&E Brockton and MGM Springfield casino, indicates that the quality of amenities will be similar.

The site plan provides adequate access/egress for patrons and employees arriving by car and adequate parking in a three level garage and at grade. Pedestrian circulation on the site will need to be further developed as the design progresses. MG&E will evaluate the viability of a shuttle bus between the MBTA downtown station and the casino and will work with the local transit agency to integrate the site into local bus routes.

The existing off-site transportation network was evaluated using accepted procedures, but will need to be expanded through the Massachusetts Environmental Policy Act (MEPA) process. The primary access is from Route 24 along Route 123 (Belmont Street) to West Street and Forest Avenue into the site. MassDOT has preexisting plans in place to reconstruct Belmont Street. MG&E will upgrade West Street and Forest Avenue. The roadway and signal improvements proposed by MG&E are estimated to cost 10.2 million dollars.

Where specific information on sustainability and security is lacking in the Application there is normally a performance standard that will need to be met as the initial design concepts are further developed. For example, information on specific sustainability measures is limited, but MG&E has committed to certify the casino as LEED Gold. Further, in terms of security, MG&E has provided protocols used at their other casinos (surveillance, communication and security plans) that will be used in Brockton, tailored to MGC regulations.

MG&E provided adequate information on water, wastewater and stormwater infrastructure. The City can provide water and MG&E is proposing approximately 1 million dollars of off-site sewer improvements to connect to the City's system. The stormwater management

S

system will retain runoff to provide 50% of irrigation needs and meet DEP stormwater standards.

Permitting for the project is straight forward, primarily because the 46-acre site was previously developed as the Brockton Racetrack and Fairgrounds. It is relatively open with few structures of any size. The MEPA process needs to be completed, followed by a MassDOT permit for off-site roadway construction and local permits from the Brockton Planning Board and DPW. There are no tidelands, wetlands or other sensitive environmental features that require extensive permitting.

In terms of schedule, the critical path runs through completion of the MEPA process, the MassDOT permit and the time needed to complete off-site roadway construction. The current schedule calls for an opening in June 2019, with the possibility of an earlier opening at the end of 2018, if the permitting process can be accelerated.

The most positive aspects of the Application are listed below:

1. MG&E's parent company, Rush Street, has a track record in the type of casino proposed in Brockton and appears to understand the market.
2. The development team that has been assembled has experience designing casinos and has strong local technical support.
3. Based on construction costs per square foot, the MG&E Brockton casino is similar to the MGM Springfield casino.
4. MG&E has committed to a certified LEED Gold facility, which requires a significant commissioning effort. Further, Rush Street has built a LEED Gold casino in Pennsylvania.
5. Despite a close vote in Brockton approving the casino, the City administration—significantly including the Superintendent of Schools—is unqualifiedly supportive.
6. The City Administration has created a zoning overlay district that allows the casino to be constructed 'by right'.

As the design and permitting processes proceed, the following issues should be further developed.

1. The proposed building and site plans are inward focused and, as presently configured, do not create positive interaction with surrounding commercial uses. A \$100,000 commitment has been made to prepare an Entertainment District study. This study should be accelerated, with input from MG&E, to build excitement and a vision for future development.
2. Additional transportation improvements/commitments should be considered through the MEPA process for Belmont Street/Kenelworth Avenue and Route 27/West Street.
3. Additional mitigation should be considered through the MEPA process to improve water conservation and to protect the City's Silver Lake reservoir system.

3. Criteria Rating Summary

<p>1. Demonstrate Creativity in Design and Overall Concept Excellence</p>	<p>S</p>	<p>The Applicant intends the casino to be a regional destination offering first class gaming, hotel and dining options and, in conjunction with the Shaw Center and Campanelli Stadium, anchor an entertainment district. The masonry exterior recalls mill buildings and historic properties.</p> <p>The Gaming Establishment consists of three main elements:</p> <ul style="list-style-type: none"> • Casino floor and associated food and beverage (F&B) venues • Multi-purpose ballroom and associated conference/meeting rooms • Hotel and spa. <p>These are well arranged to support the different uses, but are inward focused. A potential opportunity is lost or delayed by not incorporating the historic Brockton Fairgrounds Exhibition Hall in the gaming establishment.</p> <p>Parking and transportation infrastructure are discussed in Criterion 3.</p>
<p>2. Gaming Establishment of High Caliber with Quality Amenities in Partnership with Local Facilities</p>	<p>S</p>	<p>The Applicant proposes an inward-focused gaming floor including 2,990 gaming positions (2,100 slot machines, 100 live table games, and a 24-table poker area) in a 91,000 square foot casino floor. Non-gaming amenities include a full complement of food and beverage offerings, convenience retail, and a 250-room hotel with an additional restaurant and a spa, health club and pool. A multi-function ballroom with meeting space is located between the hotel and casino floor. The multi-function space of 12,200 square feet could accommodate up to 1,000 patrons for certain programming, including live entertainment.</p> <p>The size of the proposed casino and hotel facility is approximately 466,000 square feet, at an estimated construction cost of approximately \$295,000,000. This cost does not include furnishings, fixtures, gaming equipment or land costs.</p> <p>A comparison of the program and the costs was made between MGC Brockton and MGM Springfield as summarized in Appendix A and suggests that the quality of amenities in the MG&E casino will be similar to MGM.</p>

<p>3. Compatibility with Surroundings</p>	<p>I/S</p>	<p>The site plan provides for adequate access and egress to the casino and hotel for cars, busses and taxis. Adequate circulation and parking are also provided. Pedestrian circulation is not adequately described on the site plan and will need to be further developed as the design progresses.</p> <p>The existing off-site transportation network was evaluated using acceptable procedures. For the area intersections studied to date a reasonable package of mitigation measures has been proposed for a total cost of \$10.2 million dollars. In addition, MassDOT is planning to upgrade Route 123 (Belmont Street) from Route 24 to West Street, the main access to the casino. Further traffic mitigation should be considered at several locations through the on-going MEPA process.</p> <p>In terms of transit, the Applicant is considering shuttle bus service, including connections to the BAT downtown station and integration of existing bus routes with a stop at the casino.</p> <p>The site plan is generally positive on the neighborhood side by pulling the buildings away from the property edge to allow for a landscaped buffer. However, on the commercial side a large parking area separates it from potentially compatible uses. The Applicant will fund a \$100,000 study of an entertainment district in the vicinity of the casino, which should address this issue. However, the plan as currently configured does not incorporate the neighboring institutions.</p> <p>Among the most commonly articulated complaints received during the public comment process with regard to the application related to the proximity of the site to the Brockton High School. The High School is less than a quarter mile from the site. The proximity is made more concerning because the proposed casino lies along the routes that the students from the residential neighborhoods to the north and the east of the casino employ to walk to and from school.</p> <p>Brockton’s water and wastewater utilities should be able to support the casino development with the mitigation measures proposed in the Application along with additional water conservation measures.</p>
<p>4. Utilize Sustainable Development Principles in the Construction and During the Life Cycle of the Facility</p>	<p>S</p>	<p>The responses to Sustainability questions are consistent with the conceptual nature of the plan development at the time of the RFA-2 Application. On the positive side, the Applicant has committed to achieve LEED Gold certification through the US Green Building Council. In support of this commitment, the Applicant has included a LEED checklist identifying 62 credit points at this time; has assembled a team of well-qualified design professionals in this area; and has previously achieved LEED Gold on another casino facility. The commitment to 3rd party commissioning for both the envelope and the HVAC system is also seen as a positive.</p> <p>On the less positive side, there are limited details in support of the sustainability commitments (likely due to the early stage of design) and the Applicant has not committed to on-site energy generation and has committed only to purchase the minimum required amount of renewable green power after the first two years.</p> <p>The Applicant has provided a concept plan for the proposed stormwater utilities, but no supporting calculations. The plan must comply with State Stormwater Standards and is reasonable at this early stage of design. Water conservation measures are also reasonable to achieve a 35/50% reduction in potable water for normal uses and irrigation respectively. Further reductions should be evaluated in the MEPA process to avoid additional stress on the Silver Lake reservoir system.</p>

5. Security	S	<p>In responding to the Security, Monitoring, Surveillance and Emergency Procedures questions, the Applicant does not typically provide information specifically tailored to the proposed Brockton casino. This is consistent with the approach taken by other applicants in other regions and is in part based on the early stage of design and programming. The Applicant does respond to questions by stating that the applicable local and state codes and regulations will be followed (e.g. building and fire codes, surveillance regulations). Further, the Applicant provides the following examples from their other facilities, specifically in Pennsylvania, that addresses these questions:</p> <ul style="list-style-type: none"> • Surveillance Plan • Crisis Management and Communication Plan • Security Department Standard Operating Plan <p>The Applicant provides a designated area for MGC operations and shows the area on the floor plans. Also included is a discussion about controlling minors at access points to the casino and training of security staff on identifying minors. There are no metrics provided on the history/success of security at other casinos operated by the Applicant. There is a central monitoring system (CMS) that the Applicant uses in Pennsylvania to design, purchase and install equipment and infrastructure and the Applicant proposes to use the same system at the Brockton casino. They have also provided a standard organization chart for their IT Department that includes 11 positions.</p> <p>Given the Applicants experience in developing security plans at other casinos and the ongoing review of these plans by Commission staff to insure compliance with state and local codes and regulations, the responses to Criterion 5 questions are sufficient.</p>
6. Permitting	S	<p>The permitting process for the casino is straightforward. Once the MEPA process is complete, the only significant state permit is from Mass DOT for the roadway improvements. As noted, the MassDOT is already committed to a significant upgrade of much of Belmont Street between the Route 24 interchange and the casino site. The local process includes site plan review by the Planning Board and a stormwater permit from the DPW. The project is permitted by-right under the Brockton Zoning By-Laws.</p> <p>In terms of schedule, the critical path runs through completion of the MEPA process, the MassDOT permit and the time needed to complete off-site roadway construction. The current schedule calls for an opening in June 2019, with the possibility of an earlier opening at the end of 2018, if the permitting process can be accelerated.</p>
7. Other	S	<p>The Applicant has a limited, general response to the potential alternative use of the facility and has provided adequate documentation regarding ownership of the proposed gaming facility land.</p>

4. Review Detail

Criterion 1: Demonstrate Creativity in Design and Overall Concept Excellence

This criterion addresses the overall concept and design approach proposed by the Applicant and, additionally, offers an opportunity for the Applicant to address the spirit of the gaming legislation: “recognizing the importance of the Commonwealth’s unique cultural and social resources and integrating them into new development opportunities.” This is a holistic criterion, comprised of nine questions, to address Massachusetts Gaming Commission goals related to distinctive design that reflects Massachusetts culture and values; high quality design; respect for context; and sustainable solutions. The questions within this criterion are grouped in order of importance as follows:

GROUPING OF QUESTIONS BY IMPORTANCE		
Group 1— Design Approach	4-1 Overall Theme 4-2 Relationship with Surroundings 4-4 Color Rendering 4-5 Schematic Design 4-6 Proposed Landscaping	These questions capture the key elements of Criterion 1: the applicant’s description of its overall concept for the Casino development; an image of that proposed concept; and the schematic design documentation that illustrates the proposed building and site development and highlights its distinguishing features.
Group 2— Supporting Elements	4-3 Architects, Engineers & Designers 4-8 Parking 4-9 Transportation Infrastructure	The proposed Design Team is secondary to the approach presented in the questions above. Parking and Transportation Infrastructure information are an important aspect of the overall concept. As presented in this criterion they are considered descriptive; the evaluation of these items is more fully considered under Criterion 3 below.
Group 3— Optional Deliverable	4-7 Alternative Presentation	This item is optional. Presentations to be considered include video, virtual tours, and models. These media may add some clarity, but the graphics provided under Group 1 must adequately describe the vision and the concepts.

Criterion Rating	S	<p>There is no unique theme articulated although there is a coherent design philosophy stated, which is to employ forms, shapes and materials compatible with Brockton’s industrial past. The masonry exterior recalls mill buildings and historic properties, but this is not articulated by the Applicant. The Applicant does intend the casino to be a regional destination, offering first class gaming, hotel and dining options. It is also envisioned to anchor an entertainment district and references its proximity to the Shaw’s Center and Campanelli Stadium.</p> <p>A potential opportunity is lost or delayed by not incorporating the historic Brockton Fairgrounds Exhibition Hall in the gaming establishment. The parcel where the building is located spatially impinges on the gaming establishment site adjacent to a circulation road in the rear of the Spa and Hotel. The casino turns its back on this handsome New England building, instead of embracing it as a prominent design feature. The privacy of the lawn and pool area adjacent to the spa is potentially compromised by the downward vantage point from the southerly side of the Exhibition Hall.</p> <p>The Gaming Establishment consists of three main elements:</p> <ul style="list-style-type: none"> • Casino floor and associated food and beverage (F&B) venues • Multi-purpose ballroom and associated conference/meeting rooms
-------------------------	----------	---

	<ul style="list-style-type: none"> • Hotel and spa. <p>These are well arranged to support the different uses, but are inward focused. For example, based on the floor plan, the F&B offerings have limited connection to and visibility from the exterior. Most F&B venues only have access directly off the gaming floor. There is a restaurant planned adjacent to the hotel which will be accessible without passing through the gaming floor.</p> <p>The loading and back-of-house facilities are well situated to efficiently serve the primary F&B, hotel and ballroom uses.</p> <p>There are two external entrances to the casino, one from the main surface parking area and one from the garage. Both bring patrons directly to the gaming floor. There is a third internal entrance to the gaming floor from the hotel, past the ballroom.</p> <p>The hotel and spa have one entrance from the main surface parking area and internal access to the gaming floor and ballroom.</p> <p>See Appendix A and B for design background information.</p> <p>Parking and transportation infrastructure are discussed in Criterion 3.</p>
--	---

Group 1 Rating	
4-1 Overall theme 4-2 Relationship with Surroundings 4-4 Color Rendering 4-5 Schematic Design 4-6 Proposed Landscaping	<ul style="list-style-type: none"> • The gaming establishment will occupy the former Brockton Fair Grounds, situated off West Street and Forest Avenue between a low-rise commercial strip and single family residential neighborhoods. • The site organization, as represented in plans and renderings, provides for a significant landscaped buffer (100-200 feet) to the residential neighborhood to the east; surface parking for employees is located between this buffer and the building; and structured parking is located to the south with additional surface parking for patrons located to the west. • The Applicant’s claim that buildings are set in a “park-like setting” is supported by planted buffers to the east, south, and west but undercut by the extent of surface parking fronting the main approach roads. • The design’s masonry exterior recalls mill buildings and historic industrial properties. • The Applicant intends the casino to be a destination resort, with an estimated 4 to 5 million patrons visiting the site every year. • A potential opportunity is lost or delayed by not incorporating the historic Brockton Fairgrounds Exhibition Hall in the gaming establishment.

Group 2 Rating 4-3 Architects, Engineers & Designers 4-8 Parking 4-9 Transportation Infrastructure	S	<ul style="list-style-type: none"> • The architect, Kale Juba Wald, has significant casino experience, including the LEED Gold Certified Rivers Casino in Des Plaines, IL for the same client. • Overall, the design team appears to have a proven core of design and development professionals supplemented by firms with appropriate experience and local knowledge. • There will be 3,003 total on-site parking spaces. <ul style="list-style-type: none"> ○ 1,407 parking spaces in a grade-plus-three level parking garage. ○ 1,596 at-grade parking spaces. • The parking space per gaming position ratio of 1 should be sufficient based on industry standards. • There is adequate on-site vehicle circulation for patrons, employees, buses and taxis. • The number and location of handicapped-accessible parking spaces, preferred parking spaces for low-emitting and fuel-efficient vehicles, charging stations for electric vehicles, and carpool/vanpool/car-sharing parking spaces have not been defined. • There are 6 existing gas stations within approximately one mile of the project site for vehicle refueling. • Disabled vehicle assistance will be provided by the on-site security and staff, who will patrol the site 24/7.
Group 3 Rating 4-7 Alternative Presentation	N/A	<ul style="list-style-type: none"> • There were no alternative presentations provided (which has been common with prior applicants).

Criterion 2: Gaming Establishment of High Caliber with Quality Amenities in Partnership with Local Facilities

This criterion seeks to understand the proposed amenities, quality of finishes, customer experience, and the interrelationship of the Casino with the community and supports the objective of 23K §18 (5). The Commission is required to evaluate how the Applicant advances the objective of building a gaming establishment of high caliber with a variety of quality amenities and operate in partnership with local hotels and dining, retail and entertainment facilities. The questions within this criterion are grouped in order of importance as follows:

GROUPING OF QUESTIONS BY IMPORTANCE		
Group 1—Description of Facilities	4-10 Gaming Amenities 4-11 Non-Gaming Amenities 4-15 Entertainment Venues 4-16 Public Spaces 4-17 Description of Hotel 4-19 Quality of Amenities*	These questions provide an overall assessment of the product offered by the applicant, including appearance and quality of amenities. These items relate most directly to the gaming legislation requirements. Questions specifically called out in G.L.C. 23K, Gaming Regulations are noted with a *.
Group 2—Other Amenities	4-12 Exhibition Space 4-13 Conference Space 4-18 Other Facilities	These questions describe other amenities, including exhibition space, conference or meeting space, child care space, and other amenities. The first two questions address whether the project will compete with existing exhibition and conference venues.
Group 3—Socio/Economic/Cultural	4-14 Serving the Surrounding Community 4-20 Art	These questions address how the Casino integrates with the community as a neighbor and a business. This set is considered important to creating a gaming establishment of high caliber.
Group 4—Tourism	4-21 Tourism Diversity 4-22 Diversified Regional Tourism	These questions are mentioned in the Statute as set out below. The team considered them but recognized these are more fully considered in Category 3, Economic Development and are not as much a factor in Category 4, Building and Site Design.

Criterion Rating	S	<p>The Applicant proposes an inward-focused gaming floor including 2,990 gaming positions (2,100 slot machines, 100 live table games, and a 24-table poker area) in a 91,000 square foot casino floor. Non-gaming amenities include a full complement of food and beverage offerings, convenience retail, and a 250-room hotel with an additional restaurant and a spa, health club and pool. A multi-function ballroom with meeting space is located between the hotel and casino floor. The multi-function space of 12,200 square feet could accommodate up to 1,000 patrons for certain programming, including live entertainment.</p> <p>The size of the proposed casino and hotel facility is approximately 466,000 square feet, at an estimated construction cost of approximately \$295,000,000. This cost does not include furnishings, fixtures, gaming equipment or land costs.</p> <p>The quality of amenities, according to the Applicant will 'exceed industry standards'. The Applicant further uses the SugarHouse Casino in Philadelphia as a comparable to 'set the standard'. A comparison of the program and the costs was made between MGC Brockton and MGM Springfield as summarized in Appendix C. The construction cost was estimated at \$633/square foot for MG&E and \$667/square foot for MGM. These numbers suggest that the quality of amenities in the MG&E casino will be similar to MGM.</p> <p>MG&E has an agreement to cooperate with Brockton 21st Century, which represents Shaw's Center and Campanelli Stadium. They have also committed to fund an entertainment district study and promote their Rush Rewards Program.</p>
-------------------------	----------	---

Criterion 2: Gaming Establishment of High Caliber with Quality Amenities in Partnership with Local Facilities (cont.)

Group 1 Rating		<ul style="list-style-type: none"> The inward-focused gaming floor includes 2,990 gaming positions (2,100 slot machines, 100 live table games, and a 24-table poker area) in some 91,000 square feet (sf). The average of 30.4 sf per gaming position is consistent with other properties and affords some flexibility for the final layout of the gaming floor. Non-gaming amenities include a full complement of food and beverage (F&B) offerings but only convenience retail. There are 6 restaurants in the casino and one in the hotel for a total of 770 seats. The Applicant does not propose a dedicated entertainment venue. However, the multi-function space of 12,200 sf may accommodate up to 1,000 people for certain programming including live entertainment. (Events larger than 1,000 would utilize nearby venues.) A 250-room hotel property is directly connected to the gaming floor and offers an additional restaurant, spa and health club, pool, and multi-function ballroom/meeting space. The size of the proposed casino and hotel facility is approximately 466,000 square feet, at an estimated construction cost of approximately \$295,000,000. This cost does not include furnishings, fixtures, gaming equipment or land costs. A comparison of the program and the costs was made between MGC Brockton and MGM Springfield as shown on the attached tables. The construction cost was estimated at \$663/square foot for MG&E and \$667/square foot for MGM. These numbers suggest that the quality of amenities in the MG&E casino will be similar to MGM.
4-10 Gaming Amenities	S	
4-11 Non-Gaming Amenities		
4-15 Entertainment Venues		
4-16 Public Spaces		
4-17 Description of Hotel		
4-19 Quality of Amenities		
Group 2 Rating		<ul style="list-style-type: none"> There is no dedicated exhibition space proposed; special exhibits and/or trade shows could be accommodated in the ballroom and conference area located between the gaming floor and the hotel.
4-12 Exhibition Space	S	
4-13 Conference Space		
4-18 Other Facilities		
Group 3 Rating		<ul style="list-style-type: none"> The application offers new F&B opportunities for the surrounding community. However, with the overall hotel and gaming facility set back from the street edges, attraction to the F&B venues would be as part of the “destination” experience and the Applicant does not provide a description of how its F&B offerings complement or compete with those available in the surrounding communities. The Applicant envisions an Art Program for sculpture and painting by local artists similar to its program implemented at Riverwalk Casino, Vicksburg, MS. The program would be administered by an Art Program Panel.
4-14 Serving the Surrounding Community	I	
4-20 Art		
Group 4 Rating		
4-21 Tourism Diversity	S	
4-22 Diversified Regional Tourism		

- | | | |
|--|--|---|
| | | <ul style="list-style-type: none">• The Applicant has made an annual commitment of a minimum of \$50,000 to their Rush Rewards Program in the form of gift cards, gift certificates, or store/restaurant discounts. |
|--|--|---|

Criterion 3: Compatibility with Surroundings

This criterion solicits the applicants' plans on mitigating impacts to traffic, local services, and utilities. It also examines the relationship of the casinos with the local businesses in terms of how the casinos will support these establishments. The questions within this criterion are grouped in order of importance as follows:

GROUPING OF QUESTIONS BY IMPORTANCE		
Group 1—Transportation Adequacy, Mitigation, Improvements	4-23 Egress from Gaming Establishment Site 4-24 Adequacy of Existing Transportation Infrastructure 4-25 Transit Accommodation 4-26 Parking Facilities	Taken together, the questions of this group highlight the importance of an adequate transportation infrastructure and traffic mitigation plan to the success of the casino development. Question 4-25, transit, is derived from the gaming statute G.L. c. 23K, §18 (8). It requires that each applicant advance transit use as a means to reduce traffic and that the Commission shall evaluate the results. Questions 4-23, 4-24, and 4-26 are closely tied to 4-25 and are therefore included in this group.
Group 2—Neighborliness, Impacts on Surroundings	4-27 Adjacent Land 4-30 Minimizing Noise and Lighting 4-31 Integration with Surrounding Venues 4-32 Site Improvements	The questions in this group address how the proposed development relates to its surroundings. It considers potential impacts such as noise, lighting, and shadows on adjacent properties and potential benefits such as site improvements associated with this scale of development.
Group 3— Utilities, Services, Misc.	4-28 Delivery of supplies and trash removal 4-29 Signage 4-33 Stimulating Retail Activity 4-34 Extreme Weather 4-35 Regional Water Facilities 4-36 Sewage Facilities	These questions capture important issues related to utilities and logistics. They warrant careful consideration but are not considered as important as the questions in Groups 1 and 2.

Criterion Rating	I/S	<p>Transportation</p> <p>The site plan provides for adequate access and egress to the casino and hotel for cars, buses and taxis. There is also an appropriate distinction between patron and employee access/egress. Based on industry standards, adequate parking will be provided on-site in a garage and at-grade. The Applicant will need to evaluate the adequacy of the distance between the main entrance on Forest Avenue and the garage to ensure that queues waiting to enter the garage do not back up to Forest Avenue. The Applicant will also need to develop a pedestrian plan for the surface parking to account for safety and convenience.</p> <p>The adequacy of the existing off-site transportation network was evaluated using acceptable procedures including baseline and projected traffic volumes, trip generation rates and modeling. The original study area was expanded based on comments from the City and will be expanded again as part of the MEPA Process. For the area intersections studied to date a reasonable package of mitigation measures has been proposed. This primarily includes roadway and traffic signal improvements to Forest Avenue and West Street, the estimated total cost of which is \$10.2M. In addition to these improvements, MassDOT is planning to upgrade Route 123 (Belmont Street) from Route 24 to West Street, the main access to the casino.</p> <p>The Applicant should undertake the following as part of the ongoing MEPA process:</p>
-------------------------	------------	--

1. Evaluate the safety issues at the Route 27/West Street intersection and consider mitigation that may improve conditions.
2. Evaluate mitigation measures for the Belmont Street/Kenelworth Avenue intersection where 15% of the traffic will pass.
3. West Street in front of the casino is planned to be reconstructed using a new curved alignment. This new alignment will complicate the alignment further north on West Street through the Belmont Street intersection. The Applicant should reevaluate the proposed realignment of West Street in front of the casino with respect to the Belmont Street intersection.

In terms of transit, the Applicant is considering shuttle bus service, including connections to the Brockton Area Transit Authority (BAT) downtown station and the integration of existing bus routes with a stop at the casino. These discussions with the BAT should continue. At a minimum, there should be accommodations for a local bus stop at the casino.

See Appendix E for transportation background information.

Impact on Surroundings

The 45-acre site is large and ‘square’ in shape allowing alternative building locations. The Applicant has chosen to align the buildings generally north/south toward the east side of the site. The front of the building on the west side will face a large surface parking area for patrons, the two main entrances and adjacent commercial/retail land uses. The back of the building, on the east side, has a smaller employee parking area for employees and a 100 to 200 foot landscaped buffer which is adjacent to a residential neighborhood.

I/S

The 1,407 space, three level garage (47% of the total 3003 spaces on site) is on the southern end of the buildings providing direct access to the casino gaming floor.

This is a reasonable site plan for an independent facility. It is generally positive on the neighborhood side by pulling the buildings away from the property edge to allow for a landscaped buffer and lighting that will not spill beyond the property. However, on the commercial side, a large parking area separates the casino from potentially compatible off-site uses at, for example, the Shaw’s Center, Campanelli Stadium and possible future venues along Belmont Street, West Street and Forest Street. It’s possible that the Applicant has considered future phases of development that could better activate the edges and address compatibility with commercial surroundings, but the Application is silent on this point.


The Applicant will fund a \$100,000 study of an entertainment district in the vicinity of the casino, but this will presumably take the proposed casino site plan as a given.

Among the most commonly articulated complaints received during the public comment process with regard to the application related to the proximity of the site to the Brockton High School. The High School is less than a quarter mile from the site. The proximity is made more concerning because the proposed casino lies along the routes that the students from the residential neighborhoods to the north and the east of the casino employ to walk to and from school.

Water and Wastewater Utilities

	<p>Brockton’s water and wastewater utilities should be able to support the casino development with the mitigation measures proposed in the Application together with additional water conservation measures to avoid added stress on the Silver Lake reservoir system. Infiltration/Inflow (I/I) reductions in the sewerage system will also be implemented in line with those typically required by the Brockton DPW.</p>
--	--

Group 1 Rating	I/S	<ul style="list-style-type: none"> • Primary access/egress is proposed along Forest Avenue with traffic signal control. • Secondary access/egress is via West Street. This driveway is proposed to function as a “right-in, right-out” driveway.
4-23 Egress from Gaming Establishment		<ul style="list-style-type: none"> • Potential for the third access/egress via a “right-in, right-out” driveway connection to Belmont Street. • Two additional vehicle access points from Belmont Street via Kenelworth Ave and Forest Avenues primarily for employees and service vehicles, though patrons may also use these driveways.
4-24 Adequacy of Existing Transportation Infrastructure		<ul style="list-style-type: none"> • The major highway for access/egress is Route 24 which has major connections to I-93, I-195, and I-495. • Belmont Street (Route 123) provides the most direct connection between the project site and Route 24. • The total trip generation rates were equivalent to 0.37 and 0.47 trips per gaming position during a typical Friday and Saturday peak hour, respectively. This is an appropriate trip generation rate.
4-25 Transit Accommodation		<ul style="list-style-type: none"> • Brockton Area Transit Authority (BAT) has 3 existing bus lines in the immediate vicinity of the proposed casino. • The applicant is evaluating the options of locating a new bus stop on-site for one or more existing BAT bus lines and providing a community shuttle bus loop connecting the site with the Brockton Area Transit Authority downtown station.
4-26 Parking Facilities		<ul style="list-style-type: none"> • Mitigation measures proposed by the applicant include major roadway widening, a roundabout, three new traffic signals, traffic signal improvements and a “Comprehensive” Transportation Demand Management (TDM) plan. • MassDOT owns and already has plans to reconstruct and improve Belmont Street (Route 123) with bicycle lanes and vehicular turning lanes at critical locations from the Route 24 interchange to West Street. • The section of Belmont Street between Angus Beaton Drive and West Street is on the “Long Range Plan” of the State Transportation Improvement Plan and will not be completed before the casino is opened. • Further mitigation measures may be required to address safety/capacity issues at the intersections of West Street/Pleasant Street/Route 27 and Belmont Street/Kenelworth Avenue/Brockton Fairgrounds Driveway. • The parking facilities are adequate as previously described in Criterion 1, Group 2. • Queuing of vehicles entering the garage will need to be evaluated to insure that a backup extending to Forest Avenue will not occur during peak periods. • There are no defined pedestrian paths between parking spaces and entrances to the proposed resort casino facility. • It is expected that the site plan and pedestrian access plan will be refined as the project moves forward

Group 2 Rating		
4-27	Adjacent Land	
4-30	Minimizing Noise and Lighting	
4-31	Integration with Surrounding Venues	
4-32	Site Improvements	

- The site is surrounded by commercial land to the north, west and southwest and residential land to the east and southeast.
- The Applicant makes reference to ongoing discussions with The Shaw Center and Campanelli Stadium and the possibility of creating an entertainment district with support from the City. No specifics are provided other than a commitment to fund a \$100,000 study on the entertainment district and to note that roadway improvements will facilitate connectivity with entertainment venues.
- Applicant estimates 4.9 million annual visits to the gaming establishment.
- Expectation that the casino property could serve as an “anchor” for future development.
- The Applicant makes no reference to the adjacent residential neighborhoods, but does provide a landscape buffer of between 100 and 200 feet between the casino and the neighborhoods and notes that the architecture will be ‘mindful of conservative New England heritage’.
- The proposed buildings have been located internal to the large 46-acre site, surrounded by surface parking and a garage.
- The location of the casino and hotel does not facilitate access to surrounding venues, other than by car.
- There are several driveways around the site to accommodate arrivals/departures of patrons, employees and supplies.
- The roadways boarding the ‘front’ of the site, West Street and Forest Avenue, will be reconstructed as part of the project. This new alignment should be reevaluated in light of the impact on the West Street/Belmont Street intersection.
- The project is ‘car’ oriented and not integrated with surrounding commercial, retail and entertainment venues.
- The project does offer landscaping that buffers the nearby residential properties and controlled lighting that will not spill beyond the property.
- The Applicant has committed to achieving LEED Sustainable Sites credit 8 Light Pollution Reduction
- The Applicant plans to coordinate with the City to develop a noise mitigation plan for construction and operations.
- The casino is approximately ¼ mile from the Brockton High School.

Group 3 Rating		
4-28	Delivery of supplies and trash removal	S
4-29	Signage	
4-33	Stimulating Retail Activity	
4-34	Extreme Weather	
4-35	Regional Water Facilities	
4-36	Sewage Facilities	

- The casino will have a three bay loading dock in the rear of the facility, remote from public circulation and adjacent to the back of house operations.
- Supplies will be received and waste will be removed from the loading docks.
- A single-stream recycling program will be employed, where recyclables are placed in a single container to be subsequently processed off site. Recyclables include paper products, glass, plastic, steel cans, and aluminum.
- Illuminated signage will incorporate LED lighting.
- Main entry sign will be an 85’ high pylon adjacent to Belmont Street and a second 10 feet high “monument” sign will be located along Forest Avenue.
- Applicant proposes gift card program with incentive dollars to purchase goods from local businesses.
- There are no plans for the casino to be available for community use in the event of extreme weather.

Water

- The water demand from the casino is estimated to be 115,000 gallons per day on average.
- The water demands projected for the project are reasonable and conservative.
- There is sufficient water supply to serve the MG&E Casino and other future development.
- There is good access to the water distribution pipes, but there is no indication of the ability to deliver water to meet normal and fire flow demands.
- As the design progresses, fire flow tests will need to be performed to insure that adequate water pressures and flows are available for normal and fire flow demands. If not, further mitigation will be required.
- Silver Lake, the main source of water for Brockton, was down over 40 inches in the summer of 2015 resulting in the need for water conservation measures according to the City’s Drought Management Plan.
- Mitigation to reduce water use, especially when the Silver lake system is stressed, could include a commitment to use Aquaria water from the desalinization plant and pay for the cost difference, gray water reuse and elimination of potable water use for irrigation.

Wastewater

- The projected wastewater flow from the casino is 105,000 gallons per day on average.
- The projected wastewater flows for the project are reasonable and conservative.
- There is sufficient capacity at the wastewater treatment plant to accept flows from the casino and other future development.
- The construction of a new 10-inch sewer, costing \$1 million and funded by the Applicant, will provide an adequate connection to the City’s system.
- The on-site mitigation measures offered will reduce extraneous flow into the sanitary sewers.
- Infiltration Inflow (I/I) reduction should be negotiated with Brockton’s DPW as mitigation.

Criterion 4: Utilize Sustainable Development Principles in the Construction and During the Life Cycle of the Facility

This criterion considers responses regarding sustainability, both in the process of design and construction and across the life cycle of the facility. This criterion is comprised of twenty-three questions covering a broad range of concerns—including overall approach to sustainable design for the building and site; energy codes; mechanical, electrical and plumbing approaches; specific equipment and systems; on-site and off-site renewable energy commitments; and ongoing sustainable practices. Group 1 questions focus on compliance with LEED and other sustainability standards along with renewable energy sourcing and Group 2, equal in importance to Group 1, focuses on conservation measures. The Group 3 questions are considered of lesser importance.

GROUPING OF QUESTIONS—GROUP 1 AND 2 OF EQUAL IMPORTANCE AND GROUP 3 OF LESSER IMPORTANCE		
Group 1— LEED, energy performance, and energy sources/renewables	4-37 LEED Certification* 4-38 Compliance with Environmental Standards 4-39 Stretch Energy Code* 4-46 On-site Energy Generation* 4-47 Off-site Renewable Energy* 4-53 Net Zero Energy 4-54 Sustainable Building Construction	These questions require the applicants to document their intent to design and construct a facility that meets contemporary energy performance standards for buildings of this type. On-site and off-site renewable energy commitments are important parts of gauging the broader environmental performance of the proposed gaming establishments and are related to the Commonwealth’s leadership position in renewable energy. Taken together, the Group 1 questions provide a comprehensive overview of sustainability and renewable energy sourcing. Questions specifically called out in G.L.C. 23K, Gaming Regulations are noted with a *.
Group 2— Site Systems and ongoing operations	4-41 Storm Water* 4-42 Water Conservation* 4-43 Energy Efficient Equipment* 4-48 Building Envelope and HVAC 4-49 Energy Consumption Monitoring* 4-50 Advanced Building Controls for Energy* 4-51 Centralized Heating & Cooling 4-55 Ongoing Sustainable Site Operations 4-59 Grid Failure	These questions focus on the energy efficiency and conservation as opposed to energy generation. They require the applicant to document the proposed systems for heating and cooling critical to a high-performance building. In addition, sustainable approaches to site design, storm water, water use (including irrigation), and ongoing operations are also addressed by these questions, and are considered important for buildings of this scale and their environmental footprints. Questions specifically called out in G.L.C. 23K, Gaming Regulations are noted with a *.
Group 3— Finer grain sustainable strategies	4-40 Alternative Fuel Vehicles 4-44 Energy Efficient Gaming Equipment 4-45 Lighting 4-52 Shifting Peak Energy Use 4-56 Testing of Clean Energy Technologies 4-57 Energy Contracts 4-58 Public Education on Clean Energy, Sustainability	These questions require the applicants to document specific sustainable strategies that may be considered at a finer grain than the overarching approaches in Groups 1 and 2. Accordingly, these are deemed of secondary importance under this criterion.

Criterion Rating	S	<p>The responses to Sustainability questions are consistent with the conceptual nature of the plan development at the time of the RFA-2 Application. On the positive side, the Applicant has committed to achieve LEED Gold certification through the US Green Building Council. In support of this commitment, the Applicant has included a LEED checklist identifying 62 credit points at this time; has assembled a team of well-qualified design professionals in this area; and has previously achieved LEED Gold on another casino facility. The commitment to 3rd party commissioning for both the envelope and the HVAC system is also seen as a positive.</p> <p>On the less positive side, there are limited details in support of the sustainability commitments (likely due to the early</p>
-------------------------	----------	---

	<p>stage of design) and the Applicant has only committed to purchase the minimum required 10% electric consumption from renewable sources after the first 2 years. See Appendix D for sustainability background information.</p> <p>The Applicant has provided a concept plan for the proposed stormwater utilities, but no supporting calculations. The plan must comply with State Stormwater Standards and is reasonable at this early stage of design. Water conservation measures of 35/50% reductions in potable water for normal uses and irrigation respectively are also reasonable and achievable. However, further reductions should be required to avoid additional stress on the Silver Lake reservoir system.</p>
--	---

	VG	<ul style="list-style-type: none"> • The Applicant commits to achieve LEED 2009 Gold Certification and provided a supporting LEED Checklist indicating 62 credit points (2 above the Gold threshold of 60). • The Applicant has achieved LEED Gold Certification at Rivers Casino in Des Plaines, IL and key members of the team were involved in that project. • The Applicant proposes to make the building LEED-EBOM “ready” with metering, monitoring, and control systems should Operating & Maintenance certification be considered after building is operational. • The proposed facility will comply with the Massachusetts Stretch Energy Code. • The RFA-2 application makes no commitment to generate energy on-site. • Renewable energy to be purchased with a commitment to purchase 35% of project’s electricity from renewable energy sources for 2 years (LEED credit EA-6). • The Applicant has committed to purchase the minimum required 10% electric consumption from renewable sources after the first 2 years. • However, the Applicant has no plans “to operate the project as a whole or any individual buildings at net zero energy”. • The Applicant’s plans for sustainable building construction are consistent with the LEED checklist and its underlying principles. Highlights include: <ul style="list-style-type: none"> ○ solid waste diversion ○ consideration for high recycled-content materials ○ consideration for locally-sourced materials ○ minimize impacts to indoor air quality
	S	<p>Group 1 Rating</p> <p>4-37 LEED Certification</p> <p>4-38 Compliance with Environmental Standards</p> <p>4-39 Stretch Energy Code</p> <p>4-46 On-site Energy Generation</p> <p>4-47 Off-site Renewable Energy</p> <p>4-53 Net Zero Energy</p> <p>4-54 Sustainable Building Construction</p>

<p>Group 2 Rating</p> <p>4-41 Storm Water 4-42 Water Conservation 4-43 Energy Efficient Equipment 4-48 Building Envelope and HVAC 4-49 Energy Consumption Monitoring 4-50 Advanced Building Controls for Energy 4-51 Centralized Heating & Cooling 4-55 Ongoing Sustainable Site Operations 4-59 Grid Failure</p>	<p>S</p>	<p>Stormwater</p> <ul style="list-style-type: none"> • The 46-acre site was previously developed as the Brockton Racetrack and Fairgrounds. • Except for a medium yield aquifer under the western portion of the site, there are no sensitive receptors on the site • Applicant must comply with DEP Stormwater Policy and Standards, but no calculations were provided. • The Applicant has committed to reduce the runoff rate (quantity) and pollutants (quality) with a combination of the following stormwater controls: <ol style="list-style-type: none"> 1. Deep sump catch basins with hoods. 2. A wet basin (approximately 1 acre) 3. Bio retention areas (rain garden and potentially a second wet basin) 4. Subsurface infiltration (approximately 2 acres) with pretreatment by proprietary stormwater quality units. • Despite the absence of drainage and water quality calculations, the Applicant has provided a concept site plan showing the key components of the stormwater plan. • At this stage of design, which is in the concept stage at less than 10%, the stormwater plan is reasonable. • A 35% reduction in potable water is proposed (3 LEED credits) and a 50% reduction of potable water use for irrigation is proposed (2 LEED credits). • The Applicant’s water conservation plans are reasonable to achieve the 35/50% reductions noted above. These goals should be required in the License as a minimum and substantiated as the design progresses. • The Applicant should commit to some combination of water conservation, stormwater or gray water reuse and/or purchasing water from Aquaria desalinization plant to avoid stress on the Silver Lake reservoir system, especially when water levels are 40 inches below full which requires conservation measures according to the Brockton Drought Management Plan. <p>Energy</p> <ul style="list-style-type: none"> • Applicant states that they will use Energy Star equipment “as applicable”. • Energy recovery systems are proposed for “ventilation systems with high outdoor air percentages” and co-generation systems will be considered, with specific locations and quantities to be developed in subsequent phases. • Applicant commits to envelope commissioning during construction, with 3rd party commissioning agent, including thermal performance (insulation) and air infiltration and to HVAC commissioning in accordance with LEED. The Applicant plans on-going building commissioning post-occupancy. • The Applicant plans for on-going monitoring via Building Management Systems (BMS) or Building Automation Systems (BAS); metering will provide data to the BMS/BAS so that data can be applied to on-going energy saving measures. • Further, the Applicant proposes a Measurement and Verification (M&V) system for short-interval data collection and monitoring to inform energy model. • The Applicant proposes a digital lighting control system to interface with the BMS/BAS and help manage lighting loads.
--	----------	---

		<ul style="list-style-type: none"> • The Applicant proposes Central Utility Plant (CUP) for facility-wide chilled and hot water and is considering cogeneration or Combined Heat and Power (CHP) but no specific plans are presented. • The Applicant identifies strategies for on-going sustainable but there is no mention of operational waste management, a recycling plan or on-site hazardous materials management. • The project will include emergency generators for the critical loads of the facility with uninterrupted power supply (UPS) intended to protect data and security equipment. • There is no discussion of whether or how the facility might be used for shelter during emergencies.
<p>Group 3 Rating</p> <p>4-40 Alternative Fuel Vehicles</p> <p>4-44 Energy Efficient Gaming Equipment</p> <p>4-45 Lighting</p> <p>4-52 Shifting Peak Energy</p> <p>4-56 Testing of Clean Energy Technologies</p> <p>4-57 Energy Contracts</p> <p>4-58 Public Education on Clean Energy</p>	<p>S</p>	<ul style="list-style-type: none"> • Applicant will “explore” opportunities to support use of alternative fuel vehicles including on-site security rover vehicles. • As an alternative to dedicated spaces for preferential parking, the Applicant highlights implementation of complementary valet parking at Rivers Casino in Des Plaines. • Applicant “committed to using the most energy-efficient technology” on the gaming floor. For example, the slot machines will include LCD monitors and LED lighting. • Commitment to energy-efficient lighting supported by: <ul style="list-style-type: none"> ○ LED fixtures ○ Dimming capabilities ○ Centralized, digital lighting controls ○ Integration with HVAC and BMS • The Applicant is considering on-site energy generation (e.g., co-generation) and demand-response initiatives. PV arrays are mentioned as under consideration but not otherwise indicated in the design drawings. • With respect to Clean Energy Technologies, the Applicant is “open to” potential opportunities for clean energy, including collaboration with Massachusetts CEC but does not provide specific commitments. • In other responses, Applicant has indicated a 2-year commitment to purchase 35% of electric consumption from renewable sources. • The Applicant has committed to purchase the minimum required 10% electric consumption from renewable sources after the first 2 years. • Applicant does not plan any public education or outreach related to sustainability

Criterion 5: Security, Monitoring, Surveillance, and Emergency Procedures

This criterion seeks to understand the security procedures of the facility, regulatory facilitation, operational transparency, and how the facility will respond to an emergency situation. The nine questions are grouped into three topics of equal importance.

GROUPING OF QUESTIONS BY EQUALLY IMPORTANT CATEGORIES		
Group 1—Security Features	4-60 Surveillance 4-65 Excluding Minors 4-66 Security of Premises 4-67 History of Security 4-68 Computerized Accounting and Auditing	These questions address the ability of the facility’s system and/or systems to oversee operations of the facility in an efficient manner in order to maintain the security and safety of the patrons, staff, and grounds; and to ensure that minors are not permitted inside the gaming facilities.
Group 2—Regulatory Coordination	4-63 Regulatory Accommodations 4-64 Remote Regulatory Surveillance	These questions require each applicant to address regulatory requirements.
Group 3—Emergency Procedures	4-61 Emergency Evacuation 4-62 Emergency Response	This section deals with internal procedures to be implemented during an emergency and what the facility will offer local and state authorities in the event of an emergency. These responses are important to local fire, police, and EMS services to determine the potential effect this facility would have on these services.

Criterion Rating	S	<p>In responding to the Security, Monitoring, Surveillance and Emergency Procedures questions, the Applicant provides limited information specifically tailored to the proposed Brockton casino. This is consistent with the approach taken by other applicants in other regions and is based in part on the early stage of design and programming. The Applicant does respond to questions by stating that the applicable local and state codes and regulations will be followed (e.g. building and fire codes, surveillance regulations, etc.). Further, the Applicant provides examples from their other facilities, specifically those located in Pennsylvania, which address these questions. These plan are intended to be used, tailored to Massachusetts regulations, and include:</p> <ul style="list-style-type: none"> • Surveillance Plan • Crisis Management and Communication Plan • Security Department Standard Operating Plan <p>The Applicant provides a designated area for MGC operations and shows the area on the floor plans. Also included is a discussion about controlling minors at access points to the casino and training security staff to identify minors. MGC staff will have “unfettered access” to the surveillance system and its transmissions. There are no metrics provided on the history/success of security at other casinos operated by the Applicant. There is a central monitoring system (CMS) used by the Applicant in Pennsylvania to design, purchase and install equipment and infrastructure and the Applicant proposes to use this same system at the Brockton casino. They have also provided a standard organization chart for their IT Department which includes 11 positions.</p> <p>Given the Applicant’s experience with developing security plans at other casinos and the ongoing review of these plans by Commission staff to ensure compliance with state and local codes and regulations, the responses to Criterion 5 questions are sufficient.</p>
-------------------------	----------	--

Group 1 Rating		S	<ul style="list-style-type: none"> • Applicant commits to compliance with 205 CMR 141.00 regarding Surveillance of the Gaming Establishment. • Overall surveillance plan to be submitted to the MGC for approval. • MGC to have “unfettered access” to the surveillance system and its transmissions. • Sample of a Surveillance Plan from an affiliated property attached to response (confidential). • Limited access points to casino floor with assigned security personnel at access points to ID “all necessary patrons.” • Training includes emphasis on underage identification. • Separate “under 30” line utilizing technology to scan ID for validity. • Mobile patrols to monitor suspicious activity and proactively check for unaccompanied/unattended minors. • Security Department Standard Operating Procedures (SOP) from affiliated property included (confidential). • Security team to follow industry-standard best practices and work closely with local, state, and federal law enforcement and Gaming Commission staff. • Daily tracking of statistics and ongoing meetings to review compliance and discuss “monthly and quarterly statistics” mentioned. No metrics or comparative statistics provided. • Applicant’s casinos in PA utilize a central monitoring system (CMS) which required them to work closely with the Pennsylvania Gaming Control Board to “design, purchase, and install the necessary equipment and infrastructure.” The Applicant proposes the same approach in Massachusetts. • Sample IT organization chart provided showing 11 staff and an outline of responsibilities.
4-60	Surveillance		
4-65	Excluding Minors		
4-66	Security of Premises		
4-67	History of Security		
4-68	Computerized Accounting and Auditing		
Group 2 Rating		S	<ul style="list-style-type: none"> • Applicant committed to providing space for regulatory staff and State Police in an area of approximately 500 – 750 sf which is shown on the floor plan. • General features of this space described as including: offices, cubicles, conference room, interview room (with electronic surveillance monitoring), access for unrestricted surveillance viewing, a fingerprinting workstation, and a temporary holding room. • Unrestricted access will be granted to authorized MGC personnel but, typically, remote access is restricted with access only in accordance with strict protocols. • Electronic/digital audit logs maintained to document remote access including individuals, camera, and areas authorized to view.
4-63	Regulatory Accommodations		
4-64	Remote Regulatory Surveillance		
Group 3 Rating		S	<ul style="list-style-type: none"> • The facility will be designed to meet or exceed applicable codes. • Fire and emergency access routes to be developed to meet local fire department requirements; fire lanes to be provided. • No specific features described but site and building design lends itself to access by emergency vehicles and we would not anticipate Applicant being unable to satisfy local fire department or other authorities having jurisdiction. • Applicant to establish an emergency response plan and discuss the plan with local, state, and federal authorities prior to opening. • Applicant attached a representative Crisis Management Plan and Crisis Management Communication Plan from an affiliated property as an example (confidential).
4-61	Emergency Evacuation		
4-62	Emergency Response		

Criterion 6: Permitting

This criterion addresses the permits required for the projects, the status of the permitting process, zoning and zoning compliance. The nine questions grouped into two topics of equal importance.

GROUPING OF QUESTIONS BY EQUALLY IMPORTANT CATEGORIES		
Group 1—Permitting	4-69 Permit Chart 4-70 Permit Chart Attachments 4-71 ENF 4-72 EOOEA Certificate on the ENF 4-73 Draft and Final EIR 4-74 EOOEA Certificate on the EIR's 4-75 Environmental Assessments, Findings and Environmental Impact Statements 4-77 Permit Appeals	The permitting questions request that the applicant provide a summary of the permits, copies of the permits and other related documentation. Key issues and the risks that may be associated with completing the permitting process within the anticipated schedule were evaluated.
Group 2—Zoning	4-76 Host Community Zoning	This criterion includes zoning requirements and how the project will meet them.

Criterion Rating	S	<p>The permitting process for the casino is straightforward. Once the MEPA process is complete, the only significant state permit is from MassDOT for the roadway improvements. The local process includes site plan review by the Planning Board and a stormwater permit from the DPW. The project is permitted by-right under the Brockton Zoning By-Laws.</p> <p>The critical path in the schedule runs through completion of the MEPA process, the MassDOT permit and the time needed to complete off-site roadway construction. The current schedule calls for an opening in June 2019, with the possibility of an earlier opening if the permitting process can be accelerated. See Appendix F, Schedule.</p>
-------------------------	----------	---

Group 1 Rating		S	<ul style="list-style-type: none"> • Permitting for the project is straight forward, primarily because the 46-acre site was previously developed as the Brockton Racetrack and Fairgrounds and there are no wetland recourses (e.g. wetlands, surface waters, flood plains). • At the Federal level, there is the need to obtain a General Permit for stormwater discharges during construction. This is a routine permit applied for before construction begins. • At the State level, there is the need to complete the MEPA process. The first step, filing an Environmental Notification Form (ENF) has been completed. The MEPA Unit has issued a scope of work for the next step, a Draft Environmental Impact Report (DEIR). The key scope items that will require additional impact analysis include: traffic and transportation, stormwater, air quality, water and sewer. After the DEIR is complete there will likely be a Final EIR, where comments on the DEIR will be addressed. • After the MEPA process (ENF, DEIR and FEIR) is completed state permits can be applied for and received. The only state permit that is anticipated is a Highway Access Permit from Mass DOT covering roadway and signal work and a Transportation Demand Management (TDM) Plan. • At the local level, the key permits will include Site Plan review by the Planning Board and a Stormwater permit from the DPW. Offsite roadway or sewer work may require an Order of Conditions from the Brockton Conservation Commission. • A permit chart and schedule was provided in the Application. • The critical path in the schedule runs through completion of the MEPA process, the MassDOT permit and the time needed to complete off-site roadway construction. The current schedule calls for an opening in June 2019, with the possibility of an earlier opening if the permitting process can be accelerated. See Appendix B. • The Commission will monitor the permitting process and schedule throughout design and construction.
4-69	Permit Chart		
4-70	Permit Chart Attachments		
4-71	ENF		
4-72	EOEEA Certificate (ENF)		
4-73	EIR		
4-74	EOEEA Certificate (EIR)		
4-75	Environmental Assessment, Findings, and Impact Statement		
4-77	Permit Appeals		
Group 2 Rating		VG	<ul style="list-style-type: none"> • On June 8, 2015, the Brockton City Council approved a Resort Casino Overlay District that includes the project site by a vote of 9 to Zero. • As noted by the City Solicitor in a letter dated September 14, 2015, the proposed resort casino is permitted by right under the Brockton Zoning Ordinance, Section 27.32-100.8(d), subject to site plan review by the Brockton Planning Board.
4-76	Zoning		

Criterion 7: Other

This criterion addresses pro forma information related to the site and contingent future uses. It is comprised of two unrelated questions grouped together.

GROUPING OF QUESTIONS BY IMPORTANCE		
Group 1—Other Questions	4-78 Other Uses of Facility 4-79 Property Description	These questions address the ability of the facility to be used for other proposes should gaming operations cease and the historic ownership of the property and any land options, agreements and/or environmental information.

Criterion Rating	S	The Applicant has given a satisfactory response to the potential alternative use of the facility and has provided adequate documentation regarding ownership of the proposed gaming facility land.
-------------------------	----------	--

Group 1 Rating	S	<ul style="list-style-type: none"> In the event gaming operations cease, the hotel, dining and event spaces could be repurposed to serve the community. The Applicant provided a land court plan and other documentation (Title information and Tax Assessor cards) showing the location of the proposed gaming establishment located at 600 Belmont Street in Brockton. The Land Court Plan shows the property as Lot 7, comprising 45.573 acres.
4-78 Other Uses of Facility 4-79 Property Description		