

COMMUNITY IMPACT FEE, MG&E Brockton

Payment	Upon Award of License	Pre-Opening	Year 1	Year 2	Year 3	Year 4	Year 5	Years 6-10	Year 11-15
<i>Planning/Permitting/Legal Fees</i>		\$2,129,000							
<i>Community Enhancement Fee</i>		\$3,000,000							
<i>Public safety, schools and housing</i>		\$2,000,000							
<i>Tax Payments (minimum)</i>			\$8,000,000	\$8,000,000	\$8,000,000	\$8,000,000	\$8,000,000	\$8,000,000	\$8,000,000
<i>Community Impact Fee (min)</i>			\$1,500,000	\$1,500,000	\$1,500,000	\$1,500,000	\$1,500,000	\$1,500,000	\$1,500,000
<i>Community Foundation (min)</i>			\$500,000	\$500,000	\$500,000	\$500,000	\$500,000	\$500,000	\$500,000
<i>Infrastructure Payment</i>		\$11,200,000							
<i>Additional Annual Payment</i>			up to \$1,500,000						
<i>Shaw Center Study</i>	\$25,000								
<i>Entertainment District Study</i>	\$100,000								
<i>Rush Rewards</i>			\$50,000	\$50,000	\$50,000	\$50,000	\$50,000	\$50,000	\$50,000
Total w/o Tribal Casino		\$18,450,000	>\$10,300,000						
Total with Tribal Casino			>7,050,000						

Community Services Impact Analysis, Brockton Resort Casino: Brockton, MA

Prepared for:
Mass Gaming & Entertainment, LLC

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Community Services Impact Assessment, Brockton, Massachusetts

Table of Contents

INTRODUCTION.....	2
COMMUNITY BACKGROUND	2
COMMUNITY IMPACT ASSESSMENT	3
METHODOLOGY	4
SECTION ONE: IMPACTS ON CITY OF BROCKTON, INCLUDING SCHOOLS AND HOUSING.....	5
HOUSEHOLD AND POPULATION IMPACT.....	5
SCHOOL IMPACT	5
HOUSING IMPACT.....	6
CONCLUSION.....	7
SECTION TWO: IMPACTS ON PUBLIC SAFETY	8
MUNICIPAL SERVICES INFRASTRUCTURE	8
<i>Police Operations</i>	8
<i>Fire Operations</i>	9
<i>Emergency Medical Services</i>	9
COMPARATIVE ANALYSIS	9
CONCLUSION AND IMPLICATIONS FOR BROCKTON.....	12
DISCLAIMER.....	13

INTRODUCTION

This report assesses potential community impacts from the introduction of a resort casino in Brockton, MA. Specifically, the report addresses the incremental effect on schools, housing, and public safety.

The Brockton Resort Casino will be located at the current Brockton Fairgrounds and is planned to include a gaming floor, 250 hotel rooms, restaurants, sundry retail, multifunction event and entertainment space, back of house areas, and surface and structured parking. The casino is estimated to have 2,100 slot machines and 124 table games (including poker). The Brockton Resort Casino is expected to draw approximately 4.6 million annual visitors to the area and ongoing operations are estimated to employ 1,500 people.

Community Background

Located on the southern edge of the Boston Metro Area, Brockton was once home to a thriving shoe manufacturing industry at the turn of the 20th Century. Like many other communities, Brockton has faced a number of challenges as manufacturing jobs have left the community. According to the Commonwealth of Massachusetts Labor and Workforce Development website, the Brockton labor force was 48,096 in June of 2015 with an unemployment rate of 6.8%. This is over two points higher than the state as a whole (4.6%) for the same time period. Additionally, the median household income in Brockton was only \$49,645 in 2014, 27% lower than statewide figures. Population figures have remained stable at approximately 94,000, as new immigrant communities have settled in Brockton. While this has provided the city with a population base, there has also been a need for increased services as new families move to the area. This is illustrated in the Brockton School District where approximately 90% of children receive free or reduced lunch and 40% are English Language Learners (ELL).

Brockton is a city looking to support new development throughout the community. There are currently a number of major downtown development projects underway including City Hall, downtown residential buildings, and an education hub that will host numerous local universities and colleges. With these revitalization projects already moving forward, the city would benefit greatly from the additional attraction of a resort casino development.

In addition to downtown development projects, Brockton is also making strides to support local housing and community development activities. The Brockton Redevelopment Authority releases an annual action plan which outlines the housing and community development priorities for the upcoming fiscal year. The 2015 draft identifies a wide range of objectives including public services to aid lower income families and individuals, enhanced crime prevention and job creation through economic development. The report highlights the need for the improvement of commercial building facades, enhancement of public safety, housing rehabilitation assistance to low and moderate income households and mechanisms to prevent further destabilization of marginal neighborhoods.

The funding provided by the resort casino through the Host Community Agreement and additional hotel, meal, water/sewer taxes and fees combined with the fiscal benefits from

increased sales and property taxes from anticipated other development will significantly enhance the provision of municipal services in Brockton. In addition to the funding provided by the resort casino development, many residents will benefit from an increased household income due to the estimated 1,500 permanent jobs needed to operate the casino and hotel as well as the temporary construction jobs needed to build the facility.

Community Impact Assessment

The following community impact assessment draws upon social science research as well as data analysis conducted by the Innovation Group. The increased local services and costs as a result of casino gaming operations generally fall into three categories: 1. those arising from population and development growth, 2. those arising from the impacts of increased visitation and traffic, and 3. social impacts resulting from problem gambling. Host communities should anticipate impacts similar in kind to other commercial development of similar scope and visitor potential. It is estimated that the resort casino will attract 4.6 million visitors per year, which serves as the basis of the impact analysis regarding local government services.

Overall, the benefits to the community of the resort casino are likely to significantly outweigh the costs. The resort casino will transform a currently vacant property into a regional attraction, drawing visitors to the area and providing jobs to local community members. Mass Gaming & Entertainment has committed to give a local hiring preference pursuant to the Host Community Agreement, providing employment opportunities for local residents.

The development of a resort casino in Brockton will have a small but positive impact on population and the local housing market. Increased local employment opportunities may increase the ability for residents to purchase new homes, filling vacant housing stock and consequently increasing real estate tax revenue to the city. It is projected that a small number of families with children will re-locate to Brockton for employment, and a small number of students will have a negligible impact on the Brockton School District. Furthermore, these families will also have the opportunity to purchase homes in the area, further filling vacant housing stock, increasing property values, and generating local real estate taxes. Additionally, there is the potential for crime to go down due to increased visitation to the area, new local jobs, development of a long time vacant site and additional anticipated development.

The potential for increased social service caseloads should be planned for, although it is possible that Brockton could see a reduction in social service caseload given the employment and economic benefits of gaming development, as well as the unprecedented increase in funding for problem gambling services at the state level under the Expanded Gaming Act that will accompany gaming development in the region. Dedicated funding of problem gambling prevention and treatment services through the Public Health Trust Fund is projected to total \$15-\$20 million annually, far higher than any other state in the country. Furthermore, given long-established casinos in Connecticut and Rhode Island, the new Massachusetts facility in Plainville, and the anticipated casino in Everett, the addition of gaming in Brockton is not expected to lead to an increase in prevalence rates in the local area.

Moreover, the construction and operation of the resort casino will generate additional positive economic impacts spurred by local employment and spending that are not included in this report.

An analysis of the economic impact associated with the development of the Brockton Resort Casino is being conducted by The Innovation Group, as requested by the RFA-2 Application for a Massachusetts Gaming License.

Methodology

The following assessment is based on quantitative and qualitative research, including interviews with Brockton officials, the collection of demographic data from the Census and Neilson-Claritas, and incident and budget data from local governments. Interviews were conducted with local officials in order to collect qualitative and quantitative data on the current operations for the City of Brockton. Each department provided budget data, including information on personnel and operations. A representative of The Innovation Group interviewed the following Brockton officials on May 18, 2015:

Robert Buckley – Chief of Staff, Mayor's Office

John Condon – Chief Financial Officer, City of Brockton

John Crowley – Chief of Police

Michael Thomas – Deputy Superintendent of Operations, Brockton Public Schools

Michael Williams – Fire Chief

SECTION ONE: IMPACTS ON CITY OF BROCKTON, INCLUDING SCHOOLS AND HOUSING

Household and Population Impact

In order to establish the number of new households and population, The Innovation Group assumed that 5.0% of the estimated 1,500 resort casino employees will move to Brockton for job opportunities totaling 75 employees. The household figure was then multiplied by the average household size for the state of Massachusetts in order to calculate the total population that will move into Brockton. As shown in the following table, the additional 75 households or 185 people that will re-locate to Brockton would increase the current population by 0.2%.

Brockton Resort Casino Impact on Households and Population

Number of New Employees	1,500
% of New Employees Moving to Brockton (*)	5.0%
New Employees Moving to Brockton (=)	75
Massachusetts State Avg. Household Size (*)	2.47
New Brockton Population (=)	185
% Increase of Total Population	0.2%

Source: Neilson Claritas, The Innovation Group

School Impact

Based on this household increase and Massachusetts household metrics, the increase to Brockton school enrollment is estimated to be approximately 31 children. The number of new households was multiplied by the percentage of households with children. This figure was then multiplied by the average number of children per family household (i.e., households with children) and then the average percent of school age children in the population.

Brockton Resort Casino Impact on Brockton School Enrollment

Number of New Households		75
Number of Households With Children	28%	21
Number of Children per Household	1.85	39
School age Children	80%	31

Source: Neilson Claritas, The Innovation Group

Currently, over 17,000 students are enrolled in Brockton Public Schools, and the additional 31 children should be easily incorporated into the local school district. Further, as discussed in the next section, absorption of excess housing supply has the potential to lead to greater real estate tax revenues for the city which will help accommodate the additional students. The following provides an overview of recent enrollment trends in the Brockton School District.

Brockton School District School Enrollment as of April 1, 2015

	2012	2013	2014	2015
Pre-School	310	334	320	331
Grades K-5	7,907	8,096	8,289	8,369
Grades 6-8	3,742	3,846	3,917	3,944
Grades 9-12	4,356	4,755	4,860	4,795
Total	16,315	17,031	17,386	17,439

Source: Brockton School District

Housing Impact

The additional households that are projected to locate in the Brockton area will have a small, but positive impact on the housing market. New households will support the current and future development of housing in the community.

Brockton was hit hard by the mortgage crisis in 2008 and continues to lag behind the rest of Massachusetts in recovery. According to an article titled, “Brockton at Center of Massachusetts Foreclosure Crisis” in the The Enterprise from May 5, 2014, 134 of every 1,000 units in Brockton were distressed. This is an improvement from 2013 figures, which were nearly double at 279 per 1,000 units. In comparison, the statewide rate was 44 per 1,000 units.¹ Properties are classified as distressed if a foreclosure petition has been filed or an auction scheduled in the previous year, or if it has been bank-owned for up to two years.

Although there are a large number of distressed properties, the number of housing units in Brockton has grown at a higher rate than the population, households and families. Five year projections estimate that the growth of housing units, families, and households will occur at the same rate. Currently, the number of housing units is 7% greater than the number of households in Brockton, denoting an adequate number of units. Further, additional families moving into Brockton will help absorb the excess supply, increasing property values. According to the Nielson/Claritas data, the number of housing units is projected to grow by 579 units by 2020 in Brockton, which will be sufficient to absorb the 150 households that will be locating into Brockton.

¹ <http://www.enterprisenews.com/article/20140505/News/140508300>

Brockton Population and Housing Trends

	2000/2010 Census	2015 Estimated	2020 Projected
Population	93,810	93,766	94,625
Percent Change		-0.1%	0.9%
Households	33,303	33,600	34,129
Percent Change		0.9%	1.6%
Families	22,479	22,687	23,048
Percent Change		0.9%	1.6%
Housing Units	35,552	35,959	36,538
Percent Change		1.1%	1.6%

Source: Nielson/Claritas

Brockton has higher than average rates of renter-occupied housing than both Massachusetts and the United States. Ongoing operations will create an estimated 1,500 new jobs in the region, providing stable employment for existing residents that can support homeownership, increasing homeownership figures throughout Brockton.

2015 Occupied Housing Units by Tenure

	Brockton	Massachusetts	United States
Owner-Occupied	56%	62%	65%
Renter-Occupied	44%	38%	35%

Source: Nielson/Claritas

Conclusion

Mass Gaming & Entertainment will focus on recruiting local residents of the area as outlined in the Host Community Agreement. This will provide a wide array of job opportunities to the residents of Brockton. There will be a small number of new residents that relocate to Brockton for job opportunities. This is expected to have a small but positive impact on a city the size of Brockton.

The development of the Brockton Resort Casino will have the following impacts on the local communities:

- Add estimated 1,500 permanent jobs to support casino and hotel operations
- Brockton's population is projected to grow by 75 households (equating to 185 people)
- The School District will need to accommodate an estimated 31 students

SECTION TWO: IMPACTS ON PUBLIC SAFETY

The following section provides an overview of the current municipal services, including police, fire, and EMS followed by an analysis of the impact the resort casino development will have on these services. A city of Brockton's size will be able to manage the increased need for services that resort casino operations will entail.

Municipal Services Infrastructure

The City municipal services infrastructure is more than sufficient to service a development the size of the Brockton Resort Casino. The City has 30 departments and an annual budget of approximately \$350 million. Like many other communities throughout the United States, Brockton has been facing budget issues as the Commonwealth of Massachusetts has cut unrestricted aid to the community as the cost of health insurance and city pensions increase.

The Mayor's Budget Commentary letter from FY 2015 outlines priorities that include maintaining the current level of public safety services, including police and fire. While budgets were increased in order to address personnel issues, capital investment projects continue to be removed from the annual budgets. The following provides budget data from the 2016 budget forecaster for the city as a whole, as well as police and fire.

Budget Forecaster FY 2016				
	2013	2014	2015	2016
City of Brockton	\$316,042,426	\$327,397,355	\$339,102,005	\$349,033,970
Police	\$17,512,066	\$18,538,973	\$20,808,426	\$22,390,467
Fire	\$20,428,295	\$21,232,160	\$21,969,332	\$22,941,712

Source: City of Brockton

Budget limitations have impacted all areas of local government, including emergency services such as police, fire, and EMS. The City of Brockton has been forced to do more with less over a number of years, which is a challenge that predates the development of the proposed resort casino. An overview of current operations and budgetary needs are provided in the sections below and are followed by the impact analysis.

Police Operations

There are a total of 207 budgeted personnel in the Brockton Police Department which include 186 police officers and 21 civilians. Currently there are three vacancies in the department, two police officers and one civilian. There are a total of 40 supervisors which includes the Police Chief. In comparison to other Massachusetts communities, Brockton has a slightly lower number of officers per capita. For example, Quincy has approximately 0.23 officers per resident while Brockton has 0.20 officers per resident.

The Police Headquarters is located at 7 Commercial Street, approximately two miles from the site. This station is open 24 hours a day, seven days a week.

Brockton Police are operating with limited resources and are in need of additional funds for personnel and capital projects. In a conversation with Police Chief John Crowley, he highlighted

the call for a new police station to replace outdated facilities. As noted above, Brockton has slightly less police officers per capita than neighboring communities.

According to the 2016 budget forecaster, the Police Department's budget will continue to grow to over \$22 million in order to cover current services needs but will receive limited funds for capital investment.

Fire Operations

Fire protection will be provided by the City of Brockton. Currently there are a total of 188 employees in the department, including 172 firefighters and 16 civilians. The department responds to approximately 22,000 to 23,000 calls per year, which are primarily medical calls. The Fire Department provides emergency medical services (EMS) and advanced life saving support services (ALS) in conjunction with the local ambulance service, American Medical Response (AMR).

There are six fire stations and nine companies in Brockton, including Station No. 6, located approximately two blocks from the Brockton Fairgrounds. According to Fire Chief Michael Williams, the Brockton Fire Department is currently operating with limited personnel and looking to increase staffing so each station has 4 firefighters on each shift. Currently, they are operating at 3 each shift in many locations, including Station No. 6. In addition to staffing issues, the Brockton Fire Department has recently had to retire a tower and an engine that have not been replaced due to budget constraints.

The Fire Department budget is projected to increase in FY 2016, reaching nearly \$23 million.

Emergency Medical Services

AMR Brockton, a private company, provides emergency and non-emergency medical transport service for the Brockton and Norwood, Massachusetts, areas. AMR Brockton employs approximately 110 paramedics and EMTs and handles about 38,600 calls annually.

Comparative Analysis

Based on The Innovation Group's experience and existing research, the local community should anticipate a small increase in Police, Fire, and EMS services once the resort casino has opened. To the extent that there is an increase in incidents due to the new volume of visitors coming into the city, these incidents are largely anticipated to be minor in nature. A city the size of Brockton, with a large police and fire department, will be able to handle the increase in services required for the operation of the resort casino. Moreover, as noted in the following discussion, the positive economic impacts may ultimately lead to a decrease in crime from the existing level.

The following provides an overview of pertinent qualitative data used to illustrate the impacts (if any) that casino development has had on other host communities.

Jeremy Margolis Study

On the issue of crime, Jeremy Margolis, who had served as Assistant U.S. Attorney in Chicago, Illinois Inspector General, and Director of the Illinois State Police, found in a 1997 study² that the chance of being victim of a crime decreases after casino development. Factors include an increase in employment brought by casinos, increased law enforcement resources, safer infrastructure with well-lit garages, and an increase in general tourism activity.

In testimony before the Pennsylvania Gaming Control Board (PGCB) in 2006, Margolis was asked to give an update of his seminal study. Margolis concluded, based on examining updated crime data from the F.B.I. as well as interviews with the Executive Director of the Illinois Crime Commission, the Illinois State Police, and the Illinois Gaming Board, that the situation is “really unchanged except for the maturation of the industry, the maturation of the regulatory process has probably settled things down more than it had settled when I completed my study in 1997. It’s just not an issue.”³

Indiana Report

While specific increase in police staffing varies from community to community, many communities find no need to increase police staffing, as shown below in the examples from Indiana. The Center for Urban Policy and the Environment at Indiana University-Purdue University has prepared 5-year evaluations of riverboat licensees in 2001 for the Indiana Gaming Commission which contain sections on community impacts.⁴ The following bullet points include summaries and excerpts from these reports with respect to police and fire protection.

Tropicana Evansville (formerly Casino Aztar):

- The Evansville Police Department reported no increases in crime since the riverboat opening in 1995. In fact, they reported a drop in crime in 1999 when compared to the previous year.
- According to the Evansville Police Department, no new police officers or firefighters were added and traffic control has not been a problem.

Majestic Star:

- Gary's Chief of Police reported no additional criminal activity surrounding the riverboat.

Horseshoe Hammond (formerly Empress Casino Hammond):

- The Hammond Police Department reported crime has fallen in most categories when compared to before the boat opened in 1996.

² Margolis, J. (December 1997). “Casinos and crime: An analysis of the evidence.” American Gaming Association.

³ PGCG hearing transcript, September 7, 2006, pages 22-23.

⁴ Center for Urban Policy and the Environment at Indiana University-Purdue University (in coordination with the Indiana Gaming Commission) (July 2001) <http://www.in.gov/gaming/reports/evaluations/majestic-5.pdf> and <http://www.in.gov/gaming/reports/evaluations/horseshoe-5.pdf>

Blue Chip Casino:

- According to Michigan City's chief of police, no additional criminal activity could be attributed to Blue Chip's presence.

The Enterprise

A recent article dated May 17, 2015 in The Enterprise, "Police: Casino Crime Worries Baseless," provided additional insight into casino impacts on communities. According to the article, "The Enterprise independently reached out to police departments from Maine to Mississippi, in places that have one or more casinos, of a similar size as the Brockton Proposal." The Enterprise's findings included the following:

- Researchers at Drexel University and Temple University analyzed 96 months of crime data in Philadelphia and concluded "that the operation of the casino had no significant effect on violent street felonies, vehicle crime, drug crime or residential burglary in the surrounding community." Additionally, Philadelphia Police Capt. Mike Cram said the study matched his experience as the leader of the police district that includes SugarHouse Casino. "If anything, crime went down because you had more people going into the neighborhood," Cram said.
- With respect to the Hollywood Casino Hotel & Raceway, opened in Bangor Maine in 2005, Police Sergeant Tim Cotton said there have been no problems with violent crime and the casino security "takes care of most of the problems." He further stated, "Honestly, it's not even something we think about. It's calls for service, but I cannot say it's been a public safety menace."
- Clyde Barrow, a casino expert and professor at the University of Texas-Pan American, says research supports the police officials' experience.

Des Plaines, Illinois

Like the case studies above, the introduction of a resort casino in Des Plaines, Illinois has had little to no impact on public safety. Located within a major metropolitan area, Des Plaines has a population of 59,000, which is approximately 2/3 the size of Brockton. Overall, the local officials who The Innovation Group contacted felt that the resort casino had very little impact on the local Police, Fire and EMS. Police Chief William Kushner stated in a conversation with The Innovation Group that "serious incidents are non-existent" at Rivers Casino.

In conversations with Fire Chief Alan Wax, he noted that the department has not had to add any staff or equipment in order to respond to the relatively small number of incidents at the resort casino. In fact, Chief Wax pointed out that the facility was built well, meeting local fire and building code, and additional resources have not been necessary to ensure patron safety.

Furthermore, the number of personnel for each department has stayed stable since the resort casino opened in 2011. In fact, both departments are operating with fewer personnel than the years before Rivers Casino opened due to budget personnel cuts in 2010.

Des Plaines Police and Fire Personnel Summary

	Police Department	Fire Department
FY2008 Authorized	131.25	104.5
FY 2009 Authorized	130	104.5
FY2010 Authorized	116	98.5
FY2011 Authorized	116	98.5
FY2012 Authorized	116	98.5
FY2013 Budget	116	98.5
FY2014 Budget	117	98.5

Source: City of Des Plaines 2012 and 2014 Budget

Conclusion and Implications for Brockton

An increase in Police and Fire calls will likely place some, but rather negligible added pressure on departments. Although currently understaffed and vying for City funding, this has been a problem for the departments before plans were put forward to develop a resort casino in Brockton.

The Brockton Resort Casino will occupy a currently vacant site and attract visitors to an area of town that previously lacked entertainment options. While additional visitation to the area will have a small increase on the need for services, there is great potential to decrease crime in the area by creating a destination and providing additional entertainment facilities.

Additionally, host communities, such as Des Plaines, did not need to increase personnel or equipment in order to maintain public safety as a result of the marginal increase in service. It is anticipated that a city the size of Brockton, with significantly more personnel and other resources than the City of Des Plaines, will easily be able to absorb the additional calls for service to the resort casino.

Positive impacts from increased tourism, jobs, and the re-use of a currently vacant property will be felt throughout the community.

DISCLAIMER

Certain information included in this report contains forward-looking estimates, projections and/or statements. The Innovation Group has based these projections, estimates and/or statements on our current expectations about future events. These forward-looking items include statements that reflect our existing beliefs and knowledge regarding the operating environment, existing trends, existing plans, objectives, goals, expectations, anticipations, results of operations, future performance and business plans.

Further, statements that include the words "may," "could," "should," "would," "believe," "expect," "anticipate," "estimate," "intend," "plan," "project," or other words or expressions of similar meaning have been utilized. These statements reflect our judgment on the date they are made and we undertake no duty to update such statements in the future.

Although we believe that the expectations in these reports are reasonable, any or all of the estimates or projections in this report may prove to be incorrect. To the extent possible, we have attempted to verify and confirm estimates and assumptions used in this analysis. However, some assumptions inevitably will not materialize as a result of inaccurate assumptions or as a consequence of known or unknown risks and uncertainties and unanticipated events and circumstances, which may occur. Consequently, actual results achieved during the period covered by our analysis will vary from our estimates and the variations may be material. As such, The Innovation Group accepts no liability in relation to the estimates provided herein.