



Massachusetts Gaming Commission
RFA-2 Application Review
Category 2 License for Slots Parlor

Report to the Commissioners for: Category # 5 - Mitigation

**Commissioner Gayle Cameron
February 21, 2014**

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1. Introduction

The questions and responses included in the Mitigation Category 5 portion of the RFA-2 application were sorted into groups that addressed similar issues for the purpose of a comprehensive evaluation. The groups identified are outlined below as Criteria 1 through 4, consisting of: Community Support, Traffic and Offsite Impacts, Measures to Promote Responsible Gaming and Address Problem Gaming and Promote and Enhance Lottery.

Criteria

Category 5 is comprised of 4 Criteria:

- Criterion 1 (Questions 5-3 to 5-21): **Community Support**
- Criterion 2 (Questions 5-1, 5-2 to 5-33 to 5-38): **Traffic and Offsite Impacts**
- Criterion 3 (Questions 5-23 to 5-32): **Measures to Promote Responsible Gaming and Address Problem Gambling**
- Criterion 4 (Questions 5-22): **Protect and Enhance Lottery**

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

- 5-1 Infrastructure Costs
- 5-2 Impacts and Costs
- 5-3 Community Impact Fee
- 5-4 Host Community Agreements
- 5-5 Election Materials
- 5-6 Mitigation
- 5-7 Election Related Advertising
- 5-8 Negative Advertising
- 5-9 Contributions
- 5-10 Request for Contribution
- 5-11 Public Outreach
- 5-12 Public Support
- 5-13 Non Profit and Community Partnerships
- 5-14 Executed Surrounding Community Agreements
- 5-15 Designation of Surrounding Community w/o Executed Agreement
- 5-16 Declined Communities
- 5-17 Mitigation
- 5-18 Executed Live Entertainment Venue Agreements (ILEV)
- 5-19 Declined ILEV Agreements
- 5-20 Cross Marketing Agreements
- 5-21 Exclusivity with Entertainers
- 5-22 Protect and Enhance the Lottery
- 5-23 On Site Resources for Problem Gambling
- 5-24 Problem Gambling Signage
- 5-25 Self Exclusion Policies
- 5-26 Identification of Problem Gambling
- 5-27 Credit Extension Abuse
- 5-28 Code of Ethics
- 5-29 Metrics for Problem Gambling
- 5-30 Advertising Responsible Gambling
- 5-31 Treatment and Prevention
- 5-32 Historical Efforts Against Problem Gambling
- 5-33 Traffic Control Measures
- 5-34 Traffic for Special Events
- 5-35 Snow Removal
- 5-36 Housing
- 5-37 School Population
- 5-38 Emergency Services Available

2. Overall Rating (Provisional)

<p>Introduction</p> <p>The RFA-2 review process consisted of: a review of the Category 2 applications, applicants’ presentations to MGC, environmental documents, public comment letters received through MGC, and site visits by subject matter experts and commissioners.</p> <p>The review group consisted of the follow: MGC staff: Mark Vander Linden, Director of Research and Problem Gambling; independent reviewers and gaming consultants from GMC Strategies, Green International, Michael & Carroll and Problem Gaming Solutions; and the Coordinator – Pinck & Co., Inc.</p>	
S	<p>Leominster PPE</p> <p>Applicant was effective in reaching agreements with host and surrounding communities. Strong support from public officials. Public opposition was registered at public hearings and through comment letters/emails.</p> <p>Proposed site is located in close proximity to an underutilized interstate highway. Applicant identifies roadway and transit related mitigation to include: accommodating bike and pedestrians on Jungle Rd, providing new traffic signals, extending local bus lines and providing a shuttle to the commuter rail station. Comments received from MassDOT on proposed mitigation and access plans indicate that some refinements and additions to the program will be required. Potential review by FHWA was noted for recommended modifications to the interchange with I-190.</p> <p>Applicant outlined their Responsible Gaming Plan from Maryland Live! facility. Applicant expressed support for strong Responsible Gaming Program and agreed to comply with any MGC regulations to be developed in this area.</p> <p>Applicant executed an agreement with the MA State Lottery.</p>
VG	<p>Plainville SGR</p> <p>Applicant was effective in reaching agreements with host and surrounding communities and created a model agreement that was used by other applicants. Host community referendum was passed by a wide margin; negligible opposition was registered at public hearings and through public comment/emails received by the MGC.</p> <p>Proposed site is located close to a major interstate highway interchange. Applicant’s preferred site access improvements are currently under review with MassDOT and Federal Highway and alternatives are being considered. Applicant committed to implement mitigation in the form of offsite roadway improvements, in addition to those required for improved access to the site.</p> <p>Applicant integrated responsible gaming practices into their casino and racing operations in many jurisdictions. Practices meet and exceed the American Gaming Association (AGA) reasonable code of conduct. Applicant agreed to comply with any MGC regulations to be developed.</p> <p>Applicant executed an agreement with the MA State Lottery.</p>
S	<p>Raynham RP</p> <p>Applicant was effective in reaching agreements with host, surrounding and nearby communities. Host community referendum was passed by a wide margin and negligible opposition was registered at public hearings and through public comment/emails received by the MGC.</p> <p>Proposed site is located some distance from a highway interchange. Applicant identifies limited roadway and transit mitigation. Additional offsite intersection improvements may be required.</p> <p>Applicant outlined responsible gaming policies and procedures at the Parx Casino in Pennsylvania. Applicant agreed to comply with any MGC regulations to be developed.</p> <p>Applicant executed an agreement with the MA State Lottery.</p>

3. Criteria Ratings

	Leominster PPE	Plainville SGR	Raynham RP
1. Community Support	<p>Sufficient</p> <p>Applicant made a concerted effort to gather support in the host and surrounding communities, including the task of negotiating Host and Surrounding Community Agreements, which is unique to Massachusetts. Applicant did an effective job, and reached agreements with a number of neighboring communities, including one whose petition to the MGC for designation as a Surrounding Community was denied. There was more public opposition to this proposal than to those submitted by other applicants.</p>	<p>Very Good</p> <p>Applicant took the community and public support requirements of the Phase 2 Application seriously and made proactive efforts to negotiate and secure surrounding community agreements with neighboring towns. Elements of these agreements were modeled elsewhere. Applicant also demonstrated strong support among residents, businesses, and community organizations and received negligible opposition in public hearings and written comments. The Host Community referendum passed by a wide margin.</p>	<p>Very Good</p> <p>Applicant addressed the surrounding community requirements and negotiated surrounding community agreements with a number of neighboring towns and committed significant annual sums to these communities if a license is awarded. In addition, Applicant entered into Nearby Community Agreements that require impacts to be measured in the future and mitigated by the Applicant. The host community referendum passed by a wide margin and there was negligible opposition at public hearings.</p>
2. Traffic and Offsite Impacts	<p>Very Good</p> <p>Applicant responded very well to the questions with the information clearly presented and addressed identified needs as well as desired goals. The access plan is clearly developed. The applicant identifies both roadway and transit related mitigation actions including reconstructing Jungle Road to accommodate bicycles and pedestrians, providing new traffic signals, updating existing traffic signal operations, extending public transit and providing a direct shuttle to the Fitchburg commuter rail station as well as to Downtown Leominster. Additional improvements to the I-190 interchange may be required per review comments from MassDOT, which may necessitate review and approval by FHWA. MassDOT also indicated that proposed signal locations may need to be modified during the permit review stage.</p>	<p>Sufficient</p> <p>Applicant provided complete responses to the questions in the application relating to the study of traffic impacts and proposed mitigation. The Applicant will implement mitigation actions proposed for two off-site intersections. The Applicant has initiated discussions with the local transit authority to bring service to the site but has made no commitments to date to participate in implementation. The applicant's preferred site access plan calls for direct access from Route 1, requiring a break in the existing median. If this access proposal (currently under review with state and local permitting agencies) is not permitted, alternative access to the site (via the existing jug handle turn) may require development of an alternative mitigation action, most likely in the form of lane re-alignments, signal modifications and enhanced</p>	<p>Sufficient</p> <p>The information provided by the Applicant related to traffic impacts, mitigation, public transportation and special event traffic control was not clearly presented. The feasibility of the proposed access plan to the site on Route 138, whether for Phase 1 or Phase 2 was not clearly delineated. Since the application was filed with the MGC, the Applicant filed a Draft EIR in which a number of issues in the application's traffic analysis were addressed including an expanded study area and the intent to discuss public transportation with the two regional transit authorities serving the area. In terms of mitigation, there were no firm commitments to implementation of off-site roadway or public transportation mitigation actions.</p>

		signage at this location. Approval by FHWA may be required if changes to the I-495 access ramps are needed to support the site access plan, which may extend the timeframe to complete final permit approval.	
3. Implement Measures to Promote Responsible Gaming (RG) and Address Problem Gambling	Sufficient	Very Good	Sufficient
	Applicant generally addressed questions by referencing their RG Plan that has been operationalized in their Maryland operation. They also repeatedly referenced values and principles in support of a strong RG program, including willingness to comply with any MGC RG rules or regulations that will be developed. The Applicant fell short by not providing any MA site specific plans to address questions. However, without knowing what exactly the MGC regulation will be, the applicant's level of specificity could be viewed as appropriate/sufficient.	Applicant has experience in operating and integrating RG practices into their casino and racing operations. The responsible gambling practices appear to meet and in a number of cases exceed the American Gaming Association (AGA) responsible code of conduct. The applicant deferred some responses to "TBD" pending the MGC's requirements.	The applicant's responses acknowledged RG requirements of the MA Expanded Gaming Act. Details provided of RG practices reflected operations in applicant's Pennsylvania Parx Casino's RG plan approved by the Pennsylvania Gaming Control Board. Thus, the applicant's general responses to the MGC RG question reflected actions, policies, and procedures underway at the Parx Casino. The RG practices described appear to be sufficient and comparable to most other U.S. casino operations. The applicant stated in several responses to RG questions they would comply with any MGC RG regulation.
4. Protect and Enhance Lottery	Sufficient	Sufficient	Sufficient
	Applicant executed an agreement with the MA State Lottery.	Applicant executed an agreement with the MA State Lottery.	Applicant executed an agreement with the MA State Lottery.

4. Review Detail

Criterion 1: Community Support

Host Community Agreement
 Surrounding Community Agreements
 Impacted Live Entertainment Venues

The evaluation of this criterion focused on the overall local and regional support the Applicant’s proposed project received during the application and review process. How communities view these proposed projects is an important element in Category 2 reviews. These are going to be new facilities and a new industry for all three communities and their neighbors, and how these developments are perceived by residents, elected officials, and local businesses must be closely considered. Evaluation of Community Support included an assessment of the process and outcomes undertaken in negotiating and securing both agreements with their Host Communities as well as their outreach, negotiation and agreements with their surrounding communities and regional entertainment venues. This evaluation recognized that the Host Community Agreement and Surrounding Community Agreement requirements of the Mass. Gaming law are the first of their kind in the country and thus a new process for each of these applicants to undertake. In addition to the information submitted in the original applications and subsequent community negotiations, evaluation also included an assessment of the community support and opposition to each proposed project that was displayed in public hearings in the host and surrounding communities and/or submitted to the Commission.

GROUPING OF QUESTIONS BY SIMILARITY			
Group 1 – Content of Agreements (Host Community)	5-3 Community Impact Fee 5-4 Host Community Agreements 5-6 Mitigation	All questions relate to the applicants’ negotiated Host Community Agreements and their commitments to address all impacts. See Appendix A; Host Community Agreement Summary	
Group 1 Rating	Leominster PPE	Plainville SGR	Raynham PR
	Very Good	Very Good	Very Good
The requirement to negotiate and execute binding agreements with local host communities is a first of its kind in the gaming industry nationally, and thus a new concept and requirement for the applicants. All three applicants took this requirement seriously and negotiated and reached Host Community Agreements (HCA) in a timely fashion that were all approved by local referenda. All HCAs meet the statutory and regulatory requirements of the law and the MGC. All HCAs commit to mitigating all impacts created by construction and operation of a Category 2 facilities and each applicant also signed its “Commitment to Community Mitigation” as part of the application. All HCAs			

	include a Community Impact Fee and other financial and tax commitments and agreements to cover a range of costs incurred by the host community related to the process. While the structure and amounts of these financial commitments vary slightly, they fall within a similar range. It is not viewed as the role of this evaluation to measure or compare the quantity or quality of specific elements of the agreements, as they were negotiated and agreed upon by the two parties and approved by the voters of their communities. The approach undertaken by all Applicants and their intent to meet their obligations to their host communities demonstrates their commitment to this new requirement of the Massachusetts Gaming laws.		
Group 2 – Host Community Agreement Election-related Information	5-05 Host Community Agreements – Election Materials 5-07 Election Related Advertising 5-08 Negative Advertising 5-09 Contributions 5-10 Request for Contribution	These questions requested submission of factual information related to the election.	
Group 2 Rating	Leominster PPE	Plainville SGR	Raynham PR
	Sufficient	Sufficient	Sufficient
	Each Host Community demonstrated that the commitments included in the agreements are acceptable as evidenced by agreements signed by local officials and the referenda vote in each Host Community. All applicants addressed the questions related to the local elections and provided the required documentation.		
Group 3 – Public Support and Outreach	5-11 Public Outreach 5-12 Public Support	These questions relate to the Applicant’s connection to and support from both their host community and surrounding communities. Evaluation of these questions incorporate the public input from the public hearings held in the surrounding and host communities.	
Group 3 Rating	Leominster PPE	Plainville SGR	Raynham PR
	Sufficient	Very Good	Very Good
	Local support for the applications varied somewhat, with certain applicants receiving less opposition at public meetings than the others. Generally, all three HCAs received significant local support in the referendum votes. All applicants made efforts at public outreach and sought public support from residents and local and regional businesses.		
Group 4 –Surrounding Communities	5-14 Executed Surrounding Community Agreements 5-15 Designation of Surrounding Community w/o Executed Agreement 5-16 Declined Communities 5-17 Mitigation	All questions relate to the Applicants’ approach to identifying and negotiating with surrounding communities, a key element of the gaming legislation and the application process.	

Group 4 Rating	Leominster PPE	Plainville SGR	Raynham PR
	Very Good	Very Good	Very Good
<p>While the requirement to reach out to and negotiate surrounding community agreements is unique to Massachusetts' application process and thus new to the applicants, all followed the process and reached agreements with the designated communities. One applicant took a more proactive approach to this effort than the others, designating surrounding communities and reaching agreements with all in a timely fashion. While no applicant failed to meet the requirements of these questions, Plainville reached agreements with all of their designated communities and required no petitions to the MGC and never approached binding arbitration with any community; their agreements largely served as the model for the agreements reached by the other applicants and their surrounding communities. A key element of some surrounding community agreements was a commitment to address demonstrated mitigation needs after assessing impacts once a venue was opened and operational for one year. Surrounding Community Agreements include commitments to address impact and mitigation issues in a variety of ways and in some cases after studies can determine actual impact. As part of its RFA-2 Application, each applicant signed its "Commitment to Community Mitigation" form attesting to its agreement to commit to mitigation plans entered into as part of host community and surrounding community agreements. Add: Fitchburg Agreement/Leominster, Letters from the Community/Plainville/Raynham</p>			
Group 5 – Regional Venues	5-13 Non Profit and Community Partnerships 5-18 Executed Live Entertainment Venue Agreements 5-19 Declined ILEV Agreements 5-20 Cross Marketing Agreements 5-21 Exclusivity with Entertainers	All questions relate to the applicants' addressing concerns of nearby entertainment venues or other regional attractions.	
Group 5 Rating	Leominster PPE	Plainville SGR	Raynham PR
	Sufficient	Sufficient	Sufficient
<p>These questions in the application will apply more significantly to Category 1 applicants than Category 2. All Category 2 applicants propose relatively small entertainment elements at their facilities and any acts or activities at these locations as described in the applications are unlikely to have a negative impact on other regional facilities or attractions. All applicants addressed the questions and reached agreements in varying forms with regional attractions that address non-compete or cross marketing issues.</p>			

*These questions derive from the gaming regulations, G.L. c. 23K are specifically called out in §18 (8) as objectives each Applicant proposes to advance, and that the Commission shall evaluate and issue a statement of findings.

5-03 Community Impact Fee - Describe and identify the applicable section of the executed host community agreement, between the applicant and the host community, for the payment of a community impact fee including the timing as to when the fee will be paid in the event that the applicant is awarded a gaming license.			
Overall Comments on all Applications	All applicants met the basic requirements of the question response. While each HCA varies slightly, the total value of all elements of community benefit payments fall within a similar range.		
	Leominster PPE	Plainville SGR	Raynham PR
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> Annual payments to municipality as % of Gross Gaming Revenue with annual increases after 10 years In addition, real and personal property tax obligations Minimum guarantees 	<ul style="list-style-type: none"> Annual payments of fixed dollar amount for first five years followed by % of Gross Gaming Revenue In addition, real and personal property tax obligations 	<ul style="list-style-type: none"> Annual mitigation payment fixed for first four years then escalating not to exceed 1% of Gross Gaming Revenue. In addition, real and personal property tax obligations. Additional minor enhancements/betterment payments.
Existing and past practices supporting commitments	N/A	N/A	N/A

5-04 Host Community Agreements - Attach all host community agreements, including any appendices or attachments, into which the applicant has entered.			
Overall Comments on all Applications	Responses provided the required or requested information.		
	Leominster PPE	Plainville SGR	Raynham PR
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • Agreement Attached. • Executed in accordance with statute. 	<ul style="list-style-type: none"> • Agreement Attached. • Executed in accordance with statute. 	<ul style="list-style-type: none"> • Agreement Attached. • Executed in accordance with statute.
Existing and past practices supporting commitments	None. MA is the first jurisdiction to require HCAs.	None. MA is the first jurisdiction to require HCAs.	None. MA is the first jurisdiction to require HCAs.

5-06 Mitigation – Describe how the applicant proposes to address host community impact and mitigation issues as set forth in the host community agreement during both the construction and operation of the proposed gaming establishment.			
Overall Comments on all Applications	All HCAs outline commitments to address impact and mitigation issues. In addition, as part of its RFA-2 Application, each applicant signed the “Commitment to Community Mitigation” form attesting to its agreement to commit to mitigation plans entered into as part of host community and surrounding community agreements.		
	Leominster PPE	Plainville SGR	Raynham PR
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • HCA requires applicant to make all infrastructure improvements required by local Planning Board. • Applicant solely responsible for utility upgrades • Applicant will construct Police substation (in addition to required State Police facilities). • Applicant will prepare security plan and evaluate after commencement of operations and implement any necessary changes or additional measures. 	<ul style="list-style-type: none"> • HCA defines construction period mitigation and describes permanent traffic mitigation measures. • HCA commits to paying for all transportation improvements required by locally issued Special Permit. 	<ul style="list-style-type: none"> • HCA details applicant’s commitment to work with HC to identify and mitigate costs incurred by the town in direct relation to construction and operation per the terms of the HCA. • HCA defines that future mitigation will be based on studies. Any rejection of all or part of the studies will lead to mediation for resolution.
Existing and past practices supporting commitments	None. No other jurisdiction requires mitigation agreements or HCAs.	None. No other jurisdiction requires mitigation agreements or HCAs.	None. No other jurisdiction requires mitigation agreements or HCAs.

5-05 Host Community Agreements – Election Materials - Provide the summary of the host community agreement that was provided to the voters along with a description of the election at which the project was approved of by the voters, including the date of the election, the polling procedures, and a certified copy of the election results provided by the city or town clerk.

Overall Comments on all Applications	Responses provided the required or requested information.		
	Leominster PPE	Plainville SGR	Raynham PR
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • Election procedures and results included. • Application describes voting procedures. • Certified election vote was provided. 	<ul style="list-style-type: none"> • Election procedures and results included. 	<ul style="list-style-type: none"> • Election procedures and results included.
Existing and past practices supporting commitments	None. No other jurisdiction requires local referendum vote.	None. No other jurisdiction requires local referendum vote.	None. No other jurisdiction requires local referendum vote.

5-07 Election Related Advertising – Attach a copy of all M22 forms filed in accordance with G.L c.55, §22 relative to expenditures made by the applicant with intent to influence the outcome of the host community ballot question and/or the M101 BQ and M102 forms filed relative to the forming and funding by the applicant of a host community related ballot question committee as prescribed by the [Office of Campaign and Political Finance](#). (Please provide these items as attachments 0-00-01 *et seq.*) State the total amount of money the applicant spent on advertising or organizing for a favorable election outcome.

Overall Comments on all Applications	Responses provided the required or requested information.		
	Leominster PPE	Plainville SGR	Raynham PR
Application Commitments (e.g., targets, processes, plans)	Disclosed that it spent \$288,627.26 as of 9/27/13. Indicated it would make another timely filing. Did not submit form M22, but did submit forms M101 BQ and M102 confirming the total expenditure.	Disclosed that it spent 0. M22 form submitted.	Disclosed on application that it spent \$24,223.47. M22 form submitted.
Existing and past practices supporting commitments	N/A	N/A	N/A

5-08 Negative Advertising – Since November 22, 2011, has the applicant, any person or entity with a financial interest in the applicant, anyone acting at the direction or request of the applicant or anyone acting at the direction or request of a person or entity with a financial interest in the applicant made any monetary or in-kind contribution, directly or through an intermediary, to any entity, group or person who was urging voters to cast a negative vote in any election governed by G.L. c. 23K, §15(13)? If yes, please use attachment “0-00-01 Contributions” to state the name of the donor, the date of the monetary or in-kind contribution, the amount or nature of the contribution and the name and address of the recipient of the contribution.

Overall Comments on all Applications	Responses provided the required or requested information.		
	Leominster PPE	Plainville SGR	Raynham PR
Application Commitments (e.g., targets, processes, plans)	None according to applicant.	None according to applicant.	None according to applicant.
Existing and past practices supporting commitments	N/A	N/A	N/A

5-09 Contributions – Attach a copy of all Form M119 prescribed by the [Office of Campaign and Political Finance](#) that have been filed by the applicant in accordance with G.L. c.23K, §47. Further, in accordance with 205 CMR 108.02, disclose all political contributions, community contributions, or contributions in kind made by an applicant or qualifier to a municipality or a municipal employee of the host community from January 15, 2013 through the date of submission of this application. (Please provide these items as attachments 0-00-01 *et seq.*)

Overall Comments on all Applications	Responses provided the required or requested information.		
	Leominster PPE	Plainville SGR	Raynham PR
Application Commitments (e.g., targets, processes, plans)	Attachment stated none to report.	Attachment listed all charitable contributions. None appear to be a 'municipality or a municipal host community.	M119 filed indicating \$7409.46 spent on special election cost reimbursements to Town of Raynham.
Existing and past practices supporting commitments			

<p>5-10 Request for Contribution – Subject to the exemptions identified in 205 CMR 108.03(4), identify all requests of which the applicant is aware for any thing of substantial value, as defined by 205 CMR 108.03(1), made to an agent or employee of the applicant or any qualifier by persons or persons listed in 205 CMR 108.01(1) from January 15, 2013 through the date this application is filed. Each request identified shall include the name of the person who made the request, the date the request was made, and the nature of the request. (Note- the Commission is only interested in requests that are related in some fashion to the Massachusetts project, be it the nature of the request or the individual making the request. The Commission is not seeking disclosure of requests solely related to the applicant’s business in other states or internationally. For example, a request received by the applicant to sponsor a youth sports team in Massachusetts should be disclosed. However, a similar request by an individual unconnected to Massachusetts to sponsor a youth sports team in Nevada need not be disclosed.)</p>			
Overall Comments on all Applications	Responses provided the required or requested information.		
	Leominster PPE	Plainville SGR	Raynham PR
Application Commitments (e.g., targets, processes, plans)	None according to applicant.	List of contributions to response.	List of contributions to response.
Existing and past practices supporting commitments	N/A	N/A	N/A

5-11 Public Outreach – Provide a description and documentation for all public outreach efforts that the applicant has made to local communities.			
Overall Comments on all Applications	Each demonstrated extensive efforts to inform/engage local communities.		
	Leominster PPE	Plainville SGR	Raynham PR
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> Series of public forums - 5 hours of detailed review before city council and zoning board on proposed project. Meetings with key business groups i.e. chambers, local restaurants and lodging, civic/community groups and educational institutions Ballot question committee - homeowners/ campaigns reps present at dozen of community meetings Interviews Newspaper/online adds/Social media 	<ul style="list-style-type: none"> Applicant listed all corporate and citizens efforts over 15 years by current track operator, i.e. Lions Club, Rotary Club, Athletic Leagues, Mentoring Programs and Chambers of Commerce. Hosted six forums. Hosted two sessions with business and community organizations and leaders 	<ul style="list-style-type: none"> Applicant held community forums, meetings with nearby by towns i.e. – Easton, Taunton, Bridgewater and Lakeville. Newspapers adds, postcard mailers Letters to town depts. and media advisories
Existing and past practices supporting commitments	New project – no previous ties to communities.	Extensive existing workforce in the community at Plainridge Raceway. New applicant presently sponsors all endeavors previously sponsored by Plainridge Raceway.	Extensive sponsorships of projects important to the host and neighboring communities over decades.

5-12 Public Support – Describe in detail the public support for the project the applicant has obtained in the host and surrounding communities in addition to that reflected by the host community vote, including the names and affiliations of all individuals, including elected officials, organizations and groups that have given public support to the project, and describe any agreement relationships with local organizations.			
Overall Comments on all Applications	All applicants received support and local referendums passed by significant margins. Facilities in Plainville and Raynham have been present in their communities for many years.		
	Leominster PPE	Plainville SGR	Raynham PR
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> Referendum Vote received 61% approval. Endorsements by homeowners, trade unions, public safety unions, chambers, regional stakeholders and public officials Letters of endorsement by unions; local paper endorsement; 10 MOUs attached to response. At public hearing there was public support and public opposition from host community and surrounding community residents. 	<ul style="list-style-type: none"> Referendum Vote received 76% approval. Local support from elected officials, businesses community organizers; public support letters. Applicant made concerted effort at gaining support, which proved effective. Significant public support and very little public opposition at public hearings. 	<ul style="list-style-type: none"> Referendum Vote received 86% approval. Significant support from local residents, communities, business organizations, Applicant has had presence in community for 70 years and is viewed very favorably Letters of support i.e. public officials, unions, businesses, colleges, farms, public safety depts. and chambers of commerce Significant public support and very little public opposition at public hearings.
Existing and past practices supporting commitments	New Applicants.	Benefit of goodwill toward Plainridge Raceway.	Extensive list of examples by the Carney Family.

5-13 Non Profit and Community Partnerships – Describe and provide evidence of partnerships with or other support for non-profit and community groups in the host community.			
Overall Comments on all Applications	All applicants have developed partnerships with community groups and non-profits. Existing facilities in Plainville and Raynham have years of public support and relationships.		
	Leominster PPE	Plainville SGR	Raynham PR
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • Number of partnerships i.e. community groups, education, training relationships; marketing agreements, local and regional business developments; • 11 MOUs included in application. • Applicant provides the same response for this question as for Question 5-12. 	<ul style="list-style-type: none"> • Penn/SGR has a number of partnerships – with community organizations • Local support switched from Plainridge to Penn/SGR • Lead supporter in – Plainville Athletic League Golf Tournament; Lions Club, Fall Festival Plainville; United Methodist Church Community Pantry Program; Plainville Public Library Inventory Needs • Spent \$12. 7 million in all other jurisdictions in 2012 for non-profit community groups. 	<ul style="list-style-type: none"> • Raynham has many community partnerships and deep roots in Raynham, and the region. • Applicant commits to maintaining relationships and support for organizations developed by Raynham Park over the years.
Existing and past practices supporting commitments	Applicant relatively new to region but it is clear applicant performed significant outreach.	Many examples of community partnerships by Plainridge Raceway.	Numerous examples by owners of Raynham Park/Carney Family.

5-14 Executed Surrounding Community Agreements – Provide a copy of all executed surrounding community (SC) agreements.			
Overall Comments on all Applications	Applicants each took different approaches to reaching out to surrounding communities and reaching agreements with them. This assessment does not evaluate the nature or content of negotiations with surrounding communities, rather the approach taken by the applicant and the outcome of that process.		
	Leominster PPE	Plainville SGR	Raynham PR
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • Applicant designated no communities as SCs for Phase 2 application. • Applicant acknowledged discussions with neighboring communities on issues of “mutual interest and cooperation.” • SCAs reached with Lunenburg, Westminster, Princeton, Lancaster and Townsend. • Three communities petitioned the MGC for SC designation – Fitchburg, Bolton, and Sterling. Bolton was designated and an agreement was reached. • Sterling and Fitchburg were denied. • Despite denial, Applicant agreed to designate Fitchburg as a SC 	<ul style="list-style-type: none"> • Wrentham, Mansfield, North Attleboro, Foxboro all designated on October 2nd for Phase 2 application filing. • Agreements reached after the application deadline but before the extended MGC deadline w/ Wrentham, North Attleboro, and Mansfield. • Agreements call for mitigation based on results of impact study conducted one year after commencement of operations. • Also include commitments for job fairs, local vendor agreements and cross-marketing agreements. • Agreement reached with Foxboro to avoid arbitration. • No community petitioned the MGC for SC designation by this applicant 	<ul style="list-style-type: none"> • Applicant designated Taunton and Easton as SCs in application. • Reached SCA with Taunton during extension granted by MGC. • After submittal of Phase 2 application, Applicant reached “Nearby Community” agreements with Berkley, Lakeville, Rehoboth, West Bridgewater and Middleboro. • Agreement reached with Easton and Bridgewater avoiding arbitration.
Existing and past practices supporting commitments	None. No other jurisdiction required SCAs.	None. No other jurisdiction required SCAs.	None. No other jurisdiction required SCAs.

5-15 Designation of Surrounding Community w/o Executed Agreement – List all municipalities that the applicant wishes to designate as a surrounding community in accordance with 205 CMR 125.01(1)(a) with which no surrounding community agreement has been executed as of the time of the filing of this application. Please briefly describe the nature of the discussions with any identified community. Please attach the notice of such designation that was provided to the chief executive officer of the community in accordance with 205 CMR 125.01(1)(a).			
Overall Comments on all Applications	Question relates to status at time of RFA -2 submission.		
	Leominster PPE	Plainville SGR	Raynham PR
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> Applicant did not designate any SC in the Phase 2 Application. 	<ul style="list-style-type: none"> Applicant designated Foxboro as a SC in Phase 2 Application. 	<ul style="list-style-type: none"> Easton was designated as a SC in Phase 2 Application.
Existing and past practices supporting commitments	None. No other jurisdiction required SCAs.	None. No other jurisdiction required SCAs.	None. No other jurisdiction required SCAs.

5-16 Declined Communities – Identify any community that requested a surrounding community agreement or sought to discuss its status as a prospective surrounding community, which the applicant declined. Please explain the reasons for declining and describe the nature of the discussions or negotiations the applicant had with the community.			
Overall Comments on all Applications	While there were no “declined” communities identified by any applicant at the time of submittal October 4 th , two applicants had multiple communities petition the MGC for designation as SCs. , Each applicant had one community designated by the MGC as an SC.		
	Leominster PPE	Plainville SGR	Raynham PR
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> No communities designated as “declined” in Phase 2 application. Sterling, Fitchburg and Bolton petitioned the MGC for SC status and Bolton was designated by MGC. 	<ul style="list-style-type: none"> None. No communities designated as “declined” in Phase 2 applications. No communities petitioned MGC for SC designation. 	<ul style="list-style-type: none"> None. No communities designated as “declined” in Phase 2 applications. Dighton and Bridgewater petitioned MGC for SC status and Bridgewater was designated by MGC.
Existing and past practices supporting commitments	None. No other jurisdiction required SCAs.	None. No other jurisdiction required SCAs.	None. No other jurisdiction required SCAs.

5-17 Mitigation – Describe how the applicant proposes to address surrounding community impact and mitigation issues as set forth in the surrounding community agreements during both the construction and operation of the proposed gaming establishment.			
Overall Comments on all Applications	Surrounding Community Agreements include commitments to address impact and mitigation issues in a variety of ways and in some cases after studies can determine actual impact. As part of its RFA-2 Application, each applicant signed its “Commitment to Community Mitigation” form attesting to its agreement to commit to mitigation plans entered into as part of host and surrounding community agreements.		
	Leominster PPE	Plainville SGR	Raynham PR
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> Applicant’s SCAs provide small impact fee and % of GGR to be shared equally among SCs Funds are expected to cover any mitigation issues in the SCs Applicant commits to reimbursement of public safety expenses that can be demonstrated to be directly associated with applicant’s activities. 	<ul style="list-style-type: none"> Applicant’s SCAs commit to studying impacts one year after commencement of operations; any identified traffic impacts to be mitigated by Applicant Commits to host job fairs in communities, local hiring, local vendors etc. 	<ul style="list-style-type: none"> SCA Agreements provide annual community impact fee that is expected to cover mitigation of all traffic, safety and social impacts Nearby Community Agreements with other towns commit to studying impacts one year after commencement of operations and Applicant will pay for mitigation; and disputes on impacts will go to binding arbitration.
Existing and past practices supporting commitments	N/A	N/A	N/A

5-18 Executed Live Entertainment Venue (ILEV) Agreements – Provide a copy of all impacted live entertainment venue agreements executed in accordance with 205 CMR 126.01(1)(a).			
Overall Comments on all Applications	Applicants all addressed nearby entertainment venues with either an ILEV agreement or Cross-Marketing Agreement; given the size of the entertainment space anticipated in each of the Category 2 applicants proposals, it is unlikely that any will have an impact on local venues; cross-marketing agreements are appropriate and sufficient to address any concerns from existing facilities.		
	Leominster PPE	Plainville SGR	Raynham PR
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> None. Applicant entered into cross marketing agreements but no ILEV agreements. 	<ul style="list-style-type: none"> Applicant listed two ILEV agreements with Mass. Performing Arts Coalition and Live Nation. 	<ul style="list-style-type: none"> After submittal of Phase 2 application, Applicant entered into an agreement with South Shore Music Circus after SSMC petitioned MGC for ILEV designation.
Existing and past practices supporting commitments	N/A	N/A	N/A

5-19 Declined ILEV Agreements – Identify any venue that requested an impacted live entertainment venue agreement or sought to discuss its status as a prospective impacted live entertainment venue, which the applicant declined. Please explain the reasons for declining and describe the nature of the discussions or negotiations the applicant had with the venue.

Overall Comments on all Applications	No ILEV requested an agreement from any of the Applicants for the Phase 2 application process. Live entertainment venues are likely to see more impacts from Category 1 developments than from Category 2.		
	Leominster PPE	Plainville SGR	Raynham PR
Application Commitments (e.g., targets, processes, plans)	None.	None.	None. (After Phase 2 Application, South Shore Music Circus contacted the applicant for ILEV designation and an agreement was subsequently reached.)
Existing and past practices supporting commitments	N/A	N/A	N/A

5-20 Cross Marketing Agreements – List all cross-marketing agreements with impacted live entertainment venues the applicant has entered. If more space is needed, please use an attachment.

Overall Comments on all Applications	Response provided the required or requested information.		
	Leominster PPE	Plainville SGR	Raynham PR
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • Agreement with DCU Center in Worcester for cross marketing and regional marketing efforts. • Letter of Cooperation with Fitchburg State University President on a range of topics including supporting cultural affairs at FSU. 	<ul style="list-style-type: none"> • Applicant entered into ILEV agreements with Mass. Performing Arts Coalition and national promoter Live Nation that includes cross-marketing commitments. 	<ul style="list-style-type: none"> • After submittal of Phase 2 Application, Applicant was contacted by South Shore Music Circus and an agreement was reached.
Existing and past practices supporting commitments	N/A	N/A	N/A

5-21 Exclusivity with Entertainers – Provide a statement as to whether the applicant intends to incorporate a geographic exclusivity clause into agreements with its entertainers engaged to perform at a venue within its proposed Massachusetts gaming establishment. If so, please explain the nature of the agreements.			
Overall Comments on all Applications	Response provided the required or requested information. Similar to 5-18 and 5-20 above, exclusivity for entertainers is much more likely to be an issue with the Category 1 applicants, since the Category 2 applicants will have only minimal entertainment space and will not pursue talent/entertainers that are likely to be booked at larger area venues.		
	Leominster PPE	Plainville SGR	Raynham PR
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • Applicant intends to focus on local and regional entertainers at its Leominster facility and imposes no exclusivity on such performers. • Applicant indicates that at other facilities when national acts/headliners are booked, Applicant does impose a 90 day/90 miles exclusivity restriction. • Standard procedure at other location, but not explicit here 	<ul style="list-style-type: none"> • Applicant does not intend to impose any geographic exclusion on entertainers. 	<ul style="list-style-type: none"> • Applicant does not intend to impose any geographic exclusion on entertainers.
Existing and past practices supporting commitments	<ul style="list-style-type: none"> • Applicant imposes a 90 day/90 miles exclusivity restriction at other facilities, per above. 	All entertainment agreements preclude any exclusivity.	No geographic exclusion for entertainers at PA facility.

Criterion 2: Traffic & Offsite Impacts

The evaluation of this criterion focused on the Applicant's responses to questions grouped below regarding the adequacy of the existing infrastructure, traffic management and impacts related to housing, school population and emergency services. Of particular importance are Traffic Management (Group 2) questions. Traffic is an issue of great importance to the general public and comments on development activities often focus on the traffic impacts on the community. The Massachusetts Environmental Protection Agency (MEPA) process provides a forum for the public to comment on existing traffic conditions and concerns related to impacts due to the proposed development. Although the three Category 2 Slot Parlor Applicants studied a limited geographical area, the MEPA process will allow the public to comment on a broader area which could result in an expanded study area. Comments received from public agencies during the MEPA process, including MassDOT, highlight issues that may need to be resolved during the permitting process for site access and/or off-site traffic mitigation. Each of the three Category 2 slot parlor Applicants is in various stages of the MEPA process. If degradation of traffic operational conditions will result from the proposed development, the Applicant must mitigate those affected operational deficiencies. Agreements to mitigate traffic impacts are also incorporated into host and surrounding community agreements. It is also in the interest of the Applicant to ensure convenient and safe access and egress for its customers. The adequacy of infrastructure and ability to accommodate existing and site generated traffic is also associated with site location and access to the regional and interstate highway systems.

GROUPING OF QUESTIONS BY SIMILIARITY			
Group 1 – Impact Assessments and Costs	5- 1 Infrastructure Costs 5-2 Impacts and Costs	These questions relate to the applicants’ adequately identifying the potential impacts and required infrastructure improvements and then the costs associated with them, for off-site mitigation items.	
Group 1 Rating	Leominster PPE	Plainville SGR	Raynham RP
	Sufficient	Sufficient	Sufficient
Each of the applicants provided their respective estimate of impacts or needs. Each of them, in general, indicated that infrastructure or mitigation required as part of the permitting process would be covered even if specific actions were not identified at the time of application.			
Group 2 – Traffic Management Plan	5-33 Traffic Control Measures 5-34 Traffic for Special Events 5-35 Snow Removal	These questions relate to mitigating the off-site traffic impacts and managing the site’s traffic access and parking supply. As requested, the mitigation actions should address public transportation, special events, construction period impacts and snow removal plans.	
Group 2 Rating	Leominster PPE	Plainville SGR	Raynham RP
	Very Good	Sufficient	Sufficient
The Leominster application provided a clear description of their approach and commitments to traffic mitigation. The Leominster proposal commits to extending the Montachusett Regional Transit Authority (MART) bus route to the casino as well as to providing a direct shuttle between the Fitchburg commuter rail station and downtown Leominster to the casino. In addition, Leominster has committed to redesigning Jungle Road, which forms its key access to the site, to a <i>Complete Streets</i> condition consistent with current			

State policy to encourage bike and pedestrian access, with these improvements to be paid for/done by the applicant. Various intersection/signal improvements along Route 117, including at the I-190 ramp intersections are identified as part of the proposed mitigation program. MassDOT has commented that they may want to see modifications to the proposed intersection and ramp access improvements, and noted that review and approval from FHWA may be needed for modifications to the interchange with I-190. The Leominster proposal also presents preliminary information on construction phasing and the maintenance of traffic access along Jungle Road during that period. Snow removal can occur on-site with no or minimal impact on operations. Any special events held at Leominster casino are expected to be limited in size and not anticipated to require additional traffic control.

The Plainville application indicated several intersection mitigation actions including signal timing and minor lane configuration changes. Plainville indicated that they are willing to discuss with the Greater Attleboro Regional Transit Authority to extend public transportation but provided no commitment to facilitate the new service including financial contribution. The current preferred plan for access is not resolved for the Plainville site. Depending on the final access plan, which is currently under review with state and local agencies, additional mitigation at nearby intersections may be necessary. MassDOT approvals will be needed for the final access plan and off-site mitigation program to receive permits. If modifications to the I-495 interchange ramps are required for the plan, FHWA will also need to review and approve the plans. While the application implied no major events would be held at the site, Plainville did indicate in public meetings the possibility of holding fairs and festivals. However, Plainville did not discuss the need, if any, for additional traffic management. Snow removal was not clearly addressed, however, de-icing methods were noted and with the proposed parking garage, the need for snow removal as well as its impact is greatly reduced.

The Raynham application provided less detail in identifying specific mitigation or clearly presenting a feasible access plan that illustrates minimizing impacts on the traveling public. The application indicated that there are no plans for encouraging public transportation or committing to bringing local bus service to the site. Snow storage is proposed to be done on site consistent with the Applicant's Pollution Control plan.

Subsequent to the Application, the Applicant filed a Draft Environmental Impact Report (DEIR) with MEPA. As part of the DEIR, comments that had previously been submitted by the two affected regional planning agencies, MassDOT and several of the communities in proximity to the project site were required to be addressed. This included expanding the study area. While the study area was expanded and an increased number of intersections were evaluated and identified for potential mitigation, the Applicant does not commit to provide any off-site road mitigation – similar to the study attached to the Application. Also, in the DEIR, the Applicant has modified the approach to public bus transportation indicating a willingness to work with the local transit agencies, although the Applicant does not make any firm commitments in relation to participating in public transportation as a way to reduce overall traffic impact.

It should be noted that each applicant has indicated that they would be responsible for any further identified mitigation resulting from further MEPA review and the Surrounding Communities process. Post opening monitoring studies have been proposed by each applicant.

Group 3 – Other Potential Impacts	5-36 Housing 5-37 School Population 5-38 Emergency Services Available	The intent of these questions was to assess the impact of increased population in the community. Where these are relatively small facilities compared to Category 1 venues, the impact in these areas is not likely to be considerable.	
Group 3 Rating	Leominster PPE	Plainville SGR	Raynham PR
	Sufficient	Sufficient	Sufficient

<p>The Category 2 venues will be smaller than Category 1 facilities. As a result, none of the applicants predicted significant impact in any of these categories. Housing and school populations are not likely to experience any measureable impact. The applicants' conclusions were confirmed by MGC consultants and Regional Planning Agencies for Southeastern Massachusetts. In terms of emergency services, little impact is predicted, but all applicants acknowledged the importance of close working relationships with municipal officials. Each provided evidence that they have worked to establish relationships prior to submitting applications.</p>
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*These questions derive from the gaming regulations, G.L. c. 23K are specifically called out in §18 (8) as objectives each Applicant proposes to advance, and that the Commission shall evaluate and issue a statement of findings.

5-01 Infrastructure Costs - Identify the infrastructure costs to the host and surrounding communities from construction and operation of a gaming establishment. May reference response to question 5-2 (See related agreement in section B. Signature Forms).			
Overall Comments on all Applications	Each applicant provided and/or agreed to pay for all required infrastructure costs.		
	Leominster PPE	Plainville SGR	Raynham PR
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> Noted "NO" known costs to infrastructure for either "Host" or "Surrounding" communities Applicant will pay for or do improvements to re-construct Jungle Road, including signage and traffic signals Applicant will also pay for any additional improvements required as part of the MEPA process 	<ul style="list-style-type: none"> Noted "NO" known costs to infrastructure for either "Host" or "Surrounding" communities Stated that any mitigation for traffic, utilities, etc. will be paid for by Applicant Noted that an estimated \$4,000,000 will go to roadway, traffic signal and signage improvements 	<ul style="list-style-type: none"> Noted that to date there have not been any costs identified that the "Host" or "Surrounding" communities would incur. Any mitigation for traffic, utilities, etc. will be paid for by Applicant.
Existing and past practices supporting commitments	N/A	N/A	N/A

5-02 Impacts and Costs - Provide completed studies and reports showing the proposed gaming establishment's: (i) cost to the host community and surrounding communities and the Commonwealth for the proposed gaming establishment to be located at the proposed location, and (ii) local and regional social, environmental, traffic and infrastructure impacts.			
Overall Comments on all Applications	Each applicant provided copies of various studies, reports and documents although there was limited, clear information provided on the details of the potential costs. At this stage in the planning of the projects, all responses were judged to be sufficient.		
	Leominster PPE	Plainville SGR	Raynham PR
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • Included a Traffic Impact Study • Included an Impact Assessment • Included a Woodard and Curran Report 	<ul style="list-style-type: none"> • Included an Impact Study • Included an Economic Impact Study • Stated that \$4,000,000 would be spent on Infrastructure improvements 	<ul style="list-style-type: none"> • Included the ENF • Included a Nearby Community Impact Report • Included an Economic Impact Report • Stated that \$1,500,000 is the estimated Infrastructure costs
Existing and past practices supporting commitments	N/A	N/A	N/A

5- 33 Traffic Control Measures – Describe the plans for traffic control measures the applicant proposes for the gaming establishment complex and the surrounding areas, the expected total vehicle traffic generated by the site, and plans for mitigating vehicle trips to and from the site both during construction and operation of the facilities. Further, describe efforts to encourage public transportation options to access the site, and pedestrian access and amenities of the site and surrounding area.			
Overall Comments on all Applications	Applicants complete more analysis as part of the MEPA process. The MEPA Process, State, Local Permits process will ultimately determine what traffic control measures will be required.		
	Leominster PPE	Plainville SGR	Raynham PR
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • Applicant committed to: improve signal timing at the I-190 ramp intersections with Route 117 • Improvements proposed on Jungle Road as a “Complete Street” - will accommodate bike and pedestrian movement along Jungle Road • A new signal on Jungle Road at the Walmart Drive to ensure driveway not blocked • Discuss extending the MART bus route from Walmart to the casino • Post opening study to determine level of impact created by casino and any further required mitigation • Provide a shuttle between casino and the commuter rail station in Leominster • Plan for construction phasing and the maintenance of traffic along Jungle Road during construction 	<ul style="list-style-type: none"> • Access is predicated on breaking Route 1 median, providing turn lanes and installing a new traffic signal on Route 1 at site drive and the I-495 southbound off-ramps. All of these require approval by MassDOT and Fed Highway. Plan, if approved, may have a negative impact on Route 1 operations and general traveling public • If preferred access plan not approved, further mitigation is likely necessary at the major intersections near the site • Committed to making improvements (signal timing) at two off-site intersections, • Applicant agreed to work with the Greater Attleboro Taunton Regional Transit Authority (GATRA) to modify existing route to serve the site, provided no firm commitment • Applicant agreed to construct a sidewalk along drive to Route 1 • Committed to post opening study to determine level of impact created by casino and any further required mitigation 	<ul style="list-style-type: none"> • The studies and responses submitted with the application included a substantially inadequate traffic study area that leaves questions relative to impacts and mitigation. Applicant subsequently agreed to a larger study area in MEPA process • The point of access would likely impact public travel but Applicant has indicated that traffic signal, turn lanes and Route 138 widening to be implemented • The one identified impact location in the Application (Route 138/Route 106) is already programmed for improvements by MassDOT over the next year or two • The Applicant indicated in the application that there are no plans for accommodating local bus service. Plan drawings submitted are unclear if the existing privately run ‘Park and Ride’ will continue to be accommodated • The site plans presented do not illustrate any substantial pedestrian accommodation on or off-site • The Applicant indicates construction traffic to use non-local roads – in “non-peak times” but maintenance of access plans not presented • The DEIR that was filed December 31, 2013 and available for review in January 2014 included a much larger study area with more intersections evaluated. The Applicant modified the manner in which site traffic was forecasted. The site traffic

			forecasts included in the DEIR are significantly lower than the traffic estimates presented in the study attached to the application. The revised traffic estimates area based on trips rates used in the Plainville study and as a result we consider them to be a low estimate of traffic – similar to the finding for the Plainville site. Saturday analysis was not complete and this was identified as a deficiency in the study attached to the application. Finally, there were no further tangible commitments for mitigation proposed by the Applicant in the DEIR even though a larger study area was evaluated.
Existing and past practices supporting commitments	N/A	N/A	N/A

5- 34 Traffic for Special Events – Describe the applicant’s plans for accommodating special events and the traffic those events may generate.			
Overall Comments on all Applications	The extent of special events proposed; the potential capacity or demands; and if large events are proposed - were traffic controls plans presented that are clear and realistic.		
	Leominster PPE	Plainville SGR	Raynham PR
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • No major (large) special events are being planned for. The entertainment venue is relatively small (i.e. 430 seats) and anything significant would tend to occur in non-peak travel periods. • Applicant will coordinate with locals related to traffic control if found necessary. 	<ul style="list-style-type: none"> • No facilities for special events have been incorporated into the design and nothing major is expected. Indicated in public meetings that there could be some larger special events to occur on the track infield (i.e. craft fair, etc.), • No discussion of adequacy or need for traffic control is provided. 	<ul style="list-style-type: none"> • Stated in application that no special events are planned that would create any other demands beyond current projections or requiring any further actions, and • The facility plan includes relatively large multipurpose floor space. Details of use and any traffic control not presented.
Existing and past practices supporting commitments	N/A	Applicant indicated at public meetings that small local groups have met at the site previously and are likely to continue to do so.	Applicant does not present any statement or supporting information except for relying on “past history” of site.

5- 35 Snow Removal – Describe the applicant's snow-removal plans.			
Overall Comments on all Applications	It should be noted that in general, the peak casino demands have been shown to occur during non-winter periods so impact on parking supply could be minimal.		
	Leominster PPE	Plainville SGR	Raynham PR
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • Snow to be stored on remote areas of parking lot, and • With plan showing 1601 spaces, there is sufficient room to store snow on site and have enough parking remain to meet the demands. 	<ul style="list-style-type: none"> • No substantive information provided. Not stated that snow would be stored on-site. • De-icing treatment methods are discussed. • Site has a parking garage for 2/3 of total supply that will reduce the snow impact and/or its removal. 	<ul style="list-style-type: none"> • Applicant indicated that there will be designated area on site for snow storage. Not specific as to location but will be developed as part of the Pollution Prevention Plan for the facility.
Existing and past practices supporting commitments	N/A	N/A	N/A

5- 36 Housing - Provide an assessment of the likely impact on the housing stock in the host and surrounding communities resulting from the new jobs the gaming establishment provides, and the steps the applicant plans to take to remedy any negative impacts.			
Overall Comments on all Applications	None of the applicants predicted any measurable effect given the size of the planned facilities and anticipated number of employees. This will likely be a more significant factor in Category 1 applications.		
	Leominster PPE	Plainville SGR	Raynham PR
Application Commitments (e.g., targets, processes, plans)	Impact assessment conducted by B&S Consulting, retained by Leominster. No significant impact according to report. Assertion that jobs are likely to be filled by local and surrounding communities and affordable housing stock's available. Small facility. Applicant asserts that housing values have increased in other jurisdictions where they operate according to applicant.	Applicant predicts no measurable effect. Employees will most likely come from local community.	Applicant predicts 'no discernable effect.' Unclear if applicant completed a study.
Existing and past practices supporting commitments	N/A	N/A	N/A

5- 37 School Population – Provide an assessment of the likely impact on school populations in the host and surrounding communities resulting from new jobs the gaming establishment provides, and the steps the applicant plans to take to remedy any negative impacts. Also, please describe the proximity and potential impact of the gaming establishment to local schools, religious institutions and facilities, and public fields and parks, including any plans designed to avoid interference with school buses, student drop-offs, local athletic events, and other education related activities, especially during peak student transportation hours.			
Overall Comments on all Applications	All of the applicants indicate there will be no impact. This will likely be a more significant issue for larger, Category 1 facilities.		
	Leominster PPE	Plainville SGR	Raynham PR
Application Commitments (e.g., targets, processes, plans)	No impact according to B&S study commissioned by Leominster.	No impact according to Ekay study commissioned by Plainville.	No meaningful impact according to applicant – no formal study referenced.
Existing and past practices supporting commitments	N/A	N/A	N/A

5- 38 Emergency Services Available – Provide an analysis of available police, fire and emergency medical services available to the gaming establishment complex, the adequacy of those resources, the steps the applicant plans to take to remedy any deficiencies, and the agreements the applicant has made with the service providers to ensure that the appropriate levels of protection are available.			
Overall Comments on all Applications	None of the applicants anticipate significant impact on existing public safety agencies. No formal studies were referenced. All acknowledge the importance of good working relationships with public safety personnel. Again, the demands will likely be more substantial with larger, Category 1 facilities.		
	Leominster PPE	Plainville SGR	Raynham PR
Application Commitments (e.g., targets, processes, plans)	Relationships established with local public safety representatives according to applicant. Applicant asserts that adequate resources exist in town, but there is no formal reference material.	Applicant refers to existing relationships with town. Applicant asserts there is no need for additional full-time personnel. Will hire additional public safety personnel (paid details) as required for specific events.	Applicant refers to existing relationships with town. No significant impact anticipated according to applicant. Applicant also indicates it is working with Raynham town officials to ensure no significant impact on Easton.
Existing and past practices supporting commitments	N/A	N/A	N/A

Criterion 3: Implement Measures to Promote Responsible Gaming and Address Problem Gambling

Criterion 3 included measures taken by the applicant to mitigate problem gambling and promote responsible gaming. Questions in this criterion focused on proposed activities in MA but also considers initiatives the applicant has undertaken at other operations. Mitigating problems by addressing problem gambling and promoting responsible gaming is a guiding value expressed in the mission statement of the Massachusetts Gaming Commission. The series of ten questions in criterion 3 are intended to capture the direct and indirect activities that an applicant will employ to mitigate problem gambling. It should be noted that while the MGC intends to adopt regulation that will aggressively work to promote responsible gaming and mitigate problem gambling, we also believe the successful applicant has the duty of seeing this carried out in all aspects of their operations.

GROUPING OF QUESTIONS BY SIMILARITY			
Group 1 – Direct efforts to mitigate problem gambling/promote responsible gaming	5- 23 On Site Resources for Problem Gambling 5- 25 Self Exclusion Policies 5- 26 Identification of Problem Gambling 5- 27 Credit Extension Abuse 5- 31 Treatment and Prevention	Represents activities the applicant will do on-site and in coordination with community providers.	
Group 1 Rating	Leominster PPE	Plainville SGR	Raynham PR
	Sufficient	Very Good	Sufficient
<p>Group 1 represents general activities the applicants will do on-site and in coordination with community providers to mitigate problem gambling and promote responsible gaming. All applicants agreed to comply with regulation(s) to be adopted by MGC. Generally applicants put forth the standard elements of accepted industry practices of responsible gaming programs within the US and in line with the American Gaming Association Responsible Gaming Code of Conduct. Plainville did a good job compared to others defining the onsite space for counseling services (Responsible Gaming Office). Plainville more clearly defines connections to community providers and the Massachusetts Council on Compulsive Gambling.</p>			
Group 2 – Processes and measures	5- 28 Code of Ethics 5- 29 Metrics for Problem Gambling 5- 32 Historical Efforts Against Problem Gambling	Includes questions relating to supporting processes to assure internal controls to mitigate problems are in place.	
Group 2 Rating	Leominster PPE	Plainville SGR	Raynham PR
	Sufficient	Very Good	Sufficient
<p>Group 2 includes questions related to supporting processes to assure internal controls to mitigate problems are in place and a demonstrated history of doing such. Plainville best described which metrics are collected and are in line with MGC priorities. Additionally, Plainville has a strong history of demonstrating a commitment to promoting responsible gaming</p>			

	and addressing problem gambling. Generally applicants did an adequate job of describing the code of ethics. None of the applicants adequately addressed the effectiveness of measures and processes.		
Group 3 – Indirect efforts to mitigate problem gambling/promote responsible gaming	5- 30 Advertising Responsible Gambling 5- 24 Problem Gambling Signage	Represents passive ways in which the applicant will work to promote responsible gaming and educate about problem gambling. Both questions in this category are important toward addressing problem gambling and promoting responsible gaming.	
Group 3 Rating	Leominster PPE	Plainville SGR	Raynham PR
	Sufficient	Sufficient	Sufficient
	Group 3 represents passive ways in which the applicant will work to promote responsible gaming and educate about problem gambling. Both questions in this category are important toward addressing problem gambling and promoting responsible gaming. All applicants provided sufficient responses to the questions that fell into this group. Responses appeared to be within common industry practice.		

*These questions derive from the gaming regulations, G.L. c. 23K are specifically called out in §18 (8) as objectives each Applicant proposes to advance, and that the Commission shall evaluate and issue a statement of findings.

5- 23 On Site Resources for Problem Gambling – Describe the on-site resources that will be accessible to those affected by gambling-related problems. (See associated agreement in section B. Signature Forms)			
Overall Comments on all Applications	All three applicants signed a <u>Public Health Mitigation</u> agreement (B. Signature Forms) which applies to this question. On site resources could mean much more than the on-site counseling center required in statute. Only one applicant fully addressed the requirement of on-site counseling space (Plainville). Leominster and Plainville both mentioned responsible alcohol service. Otherwise all applicants seemed to meet basic requirements.		
	Leominster PPE	Plainville SGR	Raynham PR
Application Commitments (e.g., targets, processes, plans)	<p>The applicant’s response, including the attachment 5-23-01, provided a very good overview of the responsible gambling plan including good detail regarding signage and employee assistance. Also a positive is the plan includes a policy on responsible alcohol service.</p> <p>There was no mention of on-site space for problem gambling counseling as required with the Expanded Gaming Act except to state the operator would comply with state requirements. The applicant appeared to build their response to this question, and the other RG questions, based upon their operations in Maryland as evidenced by repeated reference to coordinating with the Maryland Lottery.</p>	<p>General impression is that the responsible gaming plan for Plainridge Park Casino contained standard elements of a casino RG program with the addition to the MA specific requirement to provide space within the casino for independent counseling services (called Responsible Gaming Office). Also positive is the plan includes a policy on responsible alcohol service, unattended minors and specific role definition for RG.</p>	<p>The applicant’s “overview” response was limited to a general description of referral sources that would be accessible to patrons while the attachments provided a fuller description of responsible gambling practices.</p> <p>Responses suggest limited sophistication in understanding resources for problem gamblers as exemplified by referring to GA and Gam Anon as treatment and using the term “Compulsive and Problem Gambling” in describing their problem gambling awareness brochures (although, this may better reflect language used in Pennsylvania, within their statutes and RG regulations, than solely owned by the applicant).</p> <p>There was no mention of on-site space for problem gambling counseling as required with the Expanded Gaming Act.</p>
Existing and past practices supporting commitments	Measures defined are inline with practices in Maryland (Maryland Live).	Measures defined are in line with company practices elsewhere in the US	Measures defined are in line with practices at Parx in PA.

5- 24 Problem Gambling Signage – Describe the signs, alerts and other information that will be available in the gaming establishment complex to identify the on-site resources available for those affected by gambling-related problems. (See associated agreement in section B. Signature Forms)	
Overall Comments on all Applications	This question is included in the <u>Public Health Mitigation</u> agreement which was signed by all applicants. The rating is based on observations at site visits as well as narratives in the application. Plainville and Raynham are in line with current industry practices though they say they would comply

	with requirements promulgated by MGC. Leominster had a good response when combined with response to 5.23 though this wasn't observed in practice during the site visit to the Maryland facility.		
	Leominster PPE	Plainville SGR	Raynham PR
Application Commitments (e.g., targets, processes, plans)	Interestingly, the applicant addressed this question more thoroughly in their response to 5-23. However, they did refer back to their "Maryland Live! Casino Responsible Gaming Plan" as an attachment, which details their signage practices in their Maryland Casino. Taken together with the statement they would comply with all the rules and regulations promulgated by the MGC, their response can be considered complete and thorough. Appreciated reference to signage through multiple platforms including machines, web, and other traditional medium. Also mention of RG signage beyond posting the gambling helpline number.	Applicant's response appeared to represent common industry practices. Little information is provided about what the messages will be or who the target audience is.	The applicant stated they will comply with any advertising requirements promulgated by the MGC. Absent any guidance from the MGC, the applicant cited a host of signage actions that appeared to represent common industry practices.
Existing and past practices supporting commitments	Refers to RG Plan of Maryland Live!	Difficult to determine from the application if they will be replicating practices in other properties.	Following practices in Parx, PA.

5- 25 Self Exclusion Policies – Describe the exclusion policies that will be available for gaming establishment patrons and employees, including the process that will be utilized to notify individuals of the availability of self-exclusion and the steps that will be taken to assist those who request exclusion. (See associated agreement in section [B. Signature Forms](#))

Overall Comments on all Applications	This question is included in the <u>Public Health Mitigation</u> agreement which was signed by all applicants. Self- exclusion is clearly defined in the statute. So while the applicants propose how they will handle this, all generally state they will follow MGC guidance regulation.		
	Leominster PPE	Plainville SGR	Raynham PR
Application Commitments (e.g., targets, processes, plans)	Response provided procedures and practices for their Maryland property, which is a state run model, accompanied by statement that PPE would comply with any regulations or model required by the MGC. Taken together, the response adequately addresses the question and reflected values and practices consistent with good self-exclusion policies.	The applicant’s response appears to represent common industry standards with the addition of the value added capability to link self-exclusion information across all Penn National properties using “Marquee Rewards” player card system.	The response did not clearly address the question as it failed to describe the “process”. Rather, elements of self-exclusion policies were presented. However, the response suggested the “process” was not provided as the process would be based on MGC regulations rather than originating from the applicant.
Existing and past practices supporting commitments	Refers to practices outlined in RG plan for Maryland Live	Following a model used in other properties. Exclusion from one Penn property = exclusion from all Penn properties in addition to MA properties	None

5- 26 Identification of Problem Gambling – Describe the initial and ongoing training that will be used to help gaming establishment employees identify those who may have gambling-related problems, or self-identify, and assist them to obtain help for those problems.

Overall Comments on all Applications	Leominster provided the most specific information and would satisfy guidelines anticipated at this time by MGC. Though the other two applications were less specific, they appeared to generally followed AGA Code of Conduct or accepted US standards.		
	Leominster PPE	Plainville SGR	Raynham PR
Application Commitments (e.g., targets, processes, plans)	Applicant's materials from their Maryland operation reflect adherence to the AGA Code of Conduct for Responsible Gambling. The RG training PowerPoint provided along with brief response to question addressed all points of the question. The training appears to meet industry standards for U.S. operations but could be greatly improved upon. For example, the training's format is limited to information dissemination and does not appear to build in any skills training components.	Very limited information was provided; only that applicant will train all employees on RG upon hire, then annually.	The content areas within the RG training program were described. No mention of evaluation. The RG training program description appears to reflect requirements as stated in the Expanded Gaming Act with little additional detail.
Existing and past practices supporting commitments	Refers to an online training course used in Maryland and the RG plan for Maryland Live.	Difficult to determine the extent to which this is being done elsewhere.	Does not appear to be any.

5- 27 Credit Extension Abuse – Describe the policies the applicant will use to ensure that credit extensions are not being abused by those with gambling-related problems.

Overall Comments on all Applications	There isn't a screening measure that can identify problem gamblers with certainty but applicants describe polices to mitigate problems related to credit extension to the greatest extent possible. All mentioned the possibility of voluntary credit extension restrictions.		
	Leominster PPE	Plainville SGR	Raynham PR
Application Commitments (e.g., targets, processes, plans)	Leominster adequately addressed the elements of this question. One strength of their response was the description of a program where persons may elect to be placed on credit extension restrictions without the requirement to be on the self-exclusion list. How patrons are informed of the credit extension restriction service was unclear. Refers to Responsible Gaming Plan but that doesn't appear to reference credit extension.	Information provided in overview was very limited; stated decisions made based on patrons ability to pay. Lacked objective detail as how "ability to pay" would be determined. Exhibit 3 of the Responsible Gambling Plan contained a "Personal Financial/Marketing Restriction Statement" where patrons can voluntary exclude themselves from credit extensions and check cashing services.	Information provided in overview was very limited; a policy detailing actions following a patron initiating Voluntary Credit Suspension was provided with the responsible gambling plan (policy #23 within draft RG plan) and within overview applicant stated desire not to extend credit to persons suspected of being a problem gambler. However, the response lacked written policies and procedures to withhold credit when action not initiated by patron via request to suspend credit. An interesting aspect of this applicant's response was there was a statement up front that they have not determined whether or not they will be issuing credit.
Existing and past practices supporting commitments	Propose they will follow model used in Maryland.	Difficult to determine from the evidence provided.	Difficult to determine from evidence provided.

5- 28 Code of Ethics – Provide a copy of the code of ethics employees, including senior managers, are required to follow and the process by which the code is promulgated.

Overall Comments on all Applications	A code of ethics was provided by each applicant. For each, the code of ethics applies to all business practices, not just problem and responsible gaming. Each applicant sufficiently met this requirement.		
	Leominster PPE	Plainville SGR	Raynham PR
Application Commitments (e.g., targets, processes, plans)	A code of business ethics was provided that focused on value statements. The Code provided few specifics regarding behaviors and consequences. The response failed to address how the code is promulgated (as asked in the question).	Good overview of the Code of Conduct. Appreciated the integration of a “whistle blower hotline” managed by a third party. Code of Ethics did not directly address problem gambling but was thorough in setting expectations, values, and procedures for reporting and responding to ethical violations.	The Code of Ethics and Business Conduct for their Pennsylvania operation was provided, as evidenced by several references to the Pennsylvania Gaming Commission. The Code of Ethics was extensive and complete although there was only one reference to “problem gambling”.
Existing and past practices supporting commitments	Models code of ethics for Maryland Live	Code of ethics is company wide and applies to all Penn employees.	Intends to adopt the code of ethics used by Parx.

5- 29 Metrics for problem Gambling – Describe the metrics the applicant will use to measure whether it is succeeding in its efforts to reduce gambling at its gaming establishment by those with gambling-related problems and the use to which those metrics will be put and provide the data those metrics have generated for each of the last five years at each of the applicant's facilities. Further, please describe how the applicant proposes to cooperate and support the Commission in the development of an annual research agenda as provided in G.L. c. 23K, §71.

Overall Comments on all Applications Plainville provided the most clear and complete response as it addressed several issues surrounding PG. Information provided by Raynham and Leominster was limited but sufficiently answered the question.

	Leominster PPE	Plainville SGR	Raynham PR
Application Commitments (e.g., targets, processes, plans)	<p>The applicant collects metrics on their patrons who entered their self-exclusion program but those metrics were not specified. Other than individuals on the self-exclusion list, no other metrics for problem gambling are being collected in conjunction to their operations in Maryland (no mention of casino operations outside of Maryland).</p> <p>The applicant stated a willingness to work with the MGC and others in support of RG and research agenda but no specifics were provided.</p>	<p>Applicant described four areas where metrics are collected. These are:</p> <ul style="list-style-type: none"> • A self-excluded person being detected in the facility • The over service of alcohol • Underage gambling • Unattended minors 	<p>Applicant stated they have not developed any metrics to evaluate their responsible gaming plan so was unable to address the question other than to state they would follow any requirements set in place by the MGC. They do “examine various trends” to see if they represent a “systemic breakdown”.</p>
Existing and past practices supporting commitments	Refers to Maryland Live program.	Submitted a Quarterly RG Report as evidence of practices at other Penn properties	None indicated

5- 30 Advertising Responsible Gambling – Describe the extent to which responsible gambling messages will be part of the applicant's advertising.			
Overall Comments on all Applications	All responses were satisfactory/ sufficient without any one applicant standing out.		
	Leominster PPE	Plainville SGR	Raynham PR
Application Commitments (e.g., targets, processes, plans)	In general, the applicant provided a satisfactory response. They referenced their RG advertising policies used in Maryland which appear to reach a level higher than most casino operations. Appreciate attention to casino team members. Also stated commitment to follow any requirements put forth by the MGC.	Applicant stated RG messaging will be on all adverting. However, no details were provided regarding (a) size or proportionality of RG message and (b) message content areas other than helpline number and other helpline information.	In general, the applicant provided a satisfactory response. However, no details were provided regarding (a) size or proportionality of RG message and (b) message content areas other than helpline number and other helpline information.
Existing and past practices supporting commitments	Plan will be modeled after Maryland Live.	Difficult to determine existing and past practices from evidence provided.	Difficult to determine existing and past practices from evidence provided.

5- 31 Treatment and Prevention – Describe the plans the applicant has to coordinate with local providers to facilitate assistance and treatment for those with gambling-related problems and plans to develop prevention programs targeted toward vulnerable populations as the term is defined by 205 CMR 102.02.

Overall Comments on all Applications	Plainville highlighted work with the MA Council to facilitate access to treatment and facilitate prevention initiatives but didn't mention collaborative efforts beyond that. Leominster's plan modeled after Maryland Live. Raynham expressed desire to work in this area, but few specifics were provided.		
	Leominster PPE	Plainville SGR	Raynham PR
Application Commitments (e.g., targets, processes, plans)	Applicant provided very similar response to other questions where they stated their commitment to addressing RG, referenced their responsible gambling plan for their Maryland operation, and their willingness to follow any requirements put forth by the MGC. No specific mention of efforts to connect with Massachusetts local providers.	Applicant stated intent to work with MA Council on Compulsive Gambling to facilitate access to treatment and on problem gambling prevention programs. No mention of collaborative efforts with local community providers and agencies, the Department of Public Health, or the MGC.	The applicant's response adequately expressed a desire to coordinate efforts with PG treatment and prevention providers and other stakeholders. Few specifics regarding how that coordination would occur.
Existing and past practices supporting commitments	Plan will be modeled after Maryland Live.	N/A	N/A

5- 32 Historical Efforts Against Problem Gambling - Describe the processes the applicant uses to address problem gambling at the other facilities it owns or controls, the effectiveness of those processes, and the metrics the applicant uses to determine the effects.			
Overall Comments on all Applications	What are the practices and processes at other facilities as well as an overall commitment to mitigate problem gambling. Plainville has the strongest demonstrated history but failed to some facets of the question. Leominster uses the Maryland programs as a model throughout their application which at times makes it difficult to understand the plan they have for MA specific activities.		
	Leominster PPE	Plainville SGR	Raynham PR
Application Commitments (e.g., targets, processes, plans)	Applicant referenced their Responsible Gambling Plan used in their Maryland facility to provide historical reference of their efforts to address problem gambling. What was not well described where two elements of the question: the effectiveness of those efforts and the metrics used to determine effectiveness.	Applicant demonstrated history in tending to RG and supporting problem gambling research and awareness efforts through involvement with NCPG and NCRG. The extent of the involvement is unclear from reviewing the overview response to the question. However, the applicant failed to respond to important facets of the question including: the effectiveness of those processes used to address problem gambling and the metrics the applicant uses to determine the effects.	Applicant failed to provide attachments as requested. Rather, the applicant describes a review process it follows in monitoring the implementation of their Compulsive and Problem Gambling (CPG) Plan used at its Pennsylvania operation. A strength within the applicants historical efforts to address PG is it use of a Responsible Gaming Committee. Overall, the response failed to reflect a robust history in efforts to address PG.
Existing and past practices supporting commitments	As described above.	As described above.	As described above.

Criterion 4: Protect and Enhance Lottery

In reviewing this criterion, it was noted that all applicants must agree to be MA State Lottery sales agents and, as such, will have executed agreements with the MA State Lottery. Applicants were asked to present plans, measures and steps they intend to take to avoid negative impact on revenues currently generated by the MA Lottery. They were also asked to give examples of joint marketing opportunities and strategies to increase lottery ticket sales.

GROUPING OF QUESTIONS BY SIMILARITY			
Group 1 – State Lottery	5-22 State Lottery	Only one question in this category.	
Group 1 Rating	Leominster PPE	Plainville SGR	Raynham PR
	Sufficient	Sufficient	Sufficient
	While none of the proposals were particularly creative or robust, all applicants indicated a commitment as required by law to work collaboratively with the State Lottery. All applicants have signed agreements with the State Lottery.		

*These questions derive from the gaming regulations, G.L. c. 23K are specifically called out in §18 (8) as objectives each Applicant proposes to advance, and that the Commission shall evaluate and issue a statement of findings.

5- 22 State Lottery – Describe the plans, measures and steps the applicant intends to take to avoid any negative impact on the revenues currently generated by the Massachusetts State Lottery, including cross-marketing strategies with the lottery and increasing ticket sales to out-of-state residents. Further, provide a written plan demonstrating the manner in which the lottery and keno games shall be made readily accessible to the guests of the gaming establishment including the designation of any lottery outlet retail floor space. (See associated agreement in section B. Signature Forms).			
Overall Comments on all Applications	Extent to which applicants have committed to working with the State Lottery to ensure mitigate any negative impact. All applicants have a written agreement with the Lottery.		
	Leominster PPE	Plainville SGR	Raynham PR
Application Commitments (e.g., targets, processes, plans)	Response identifies opportunity to cross market. Experience partnering with other state lotteries. Executed agreement in place with MA State Lottery.	Executed agreement in place with MA State Lottery. Experience partnering with lotteries in other jurisdictions.	Executed agreement in place with MA State Lottery. Indication of a plan to partner going forward.
Existing and past practices supporting commitments	Signed agreement with MA Lottery. Provided cross marketing examples.	Signed agreement with MA Lottery.	Signed agreement with MA Lottery.

Appendix A. Host Community Agreement Summary Matrix

	MUNICIPAL PAYMENTS	JOB/INVESTMENT	MITIGATION/INFRASTRUCTURE	OTHER
LEOMINSTER/PPE	<p>Total annual estimated payments of \$3.85 million</p> <p style="padding-left: 40px;">RE/Personal property tax payments of \$1 million</p> <p style="padding-left: 40px;">Annual Community Impact Fee of \$100,000</p> <p style="padding-left: 40px;">Community Benefit Payment of \$2.7 million (Increases after 10 years to 2.5% of GGR)</p> <p style="padding-left: 40px;">Annual \$50,000 grant to Leominster Community Foundation</p> <p>Applicant to pay legal fees in any dispute in which city prevails</p> <p>Responsible for all sales, meals, and excise taxes</p> <p>Pre-construction unrestricted grant of \$250,000</p>	<p>600 construction jobs</p> <p>500-700 FTE at full operations</p> <p>Commitments to hire local residents and union members</p>	<p>Applicant will make all infrastructure improvements required by Planning Board</p> <p>Applicant will construct police substation at facility</p> <p>Applicant will prepare public safety plan with Leominster public safety agencies</p> <p>Applicant responsible for mitigating all traffic impacts</p>	<p>Initial Limited Operations (time unclear)</p> <p style="padding-left: 40px;">Need to meet all requirements and receive all permits</p> <p style="padding-left: 40px;">Less than 800 slots</p> <p>Commitments to promote responsible gambling</p>
PLAINRIDGE/SGR	<p>Total annual estimated payments of \$4.3 million</p> <p style="padding-left: 40px;">RE/Personal Property Taxes: \$1.5 million upon commencement of operations</p> <p style="padding-left: 40px;">Community Impact Fee: \$100,000 annually (increased with more slots)</p> <p style="padding-left: 40px;">Host Community Payments of \$2.7 million annually for 1st 5 years; 1.5% of GGR in years 6-10; 2% of GGR after year 11</p> <p>Building and permit fees: Estimated at \$816,000</p> <p>Legal and other costs for evaluation and negotiation</p> <p>Responsible for all sales, meals, and excise taxes</p>	<p>300 construction jobs</p> <p>400 FTE at full commencement of operations</p> <p>Preference for Plainville residents</p>	<p>Applicant pay for all traffic improvements required by the Special Permit</p>	<p>Initial Limited Operations (time unclear)</p> <p style="padding-left: 40px;">Must meet all requirements of Special Permit</p> <p style="padding-left: 40px;">Less than 800 slots</p> <p style="padding-left: 40px;">1.5% of GGR during ILO period</p> <p style="padding-left: 40px;">\$500k in taxes during ILO period</p> <p>Commitments to promote responsible gambling</p>
RAYNHAM PARK/RP	<p>Total annual estimated payments of \$3.95 million</p> <p style="padding-left: 40px;">Annual mitigation fee of \$1 million, increasing in year 4 by 1.5% upon commencement of operations; capped at 1% of GGR after year 21</p> <p style="padding-left: 40px;">Annual payment to the town of \$100,000 for capital expenditures</p> <p style="padding-left: 40px;">Annual grant of \$15,000 for façade improvement along Rte 138</p> <p style="padding-left: 40px;">HCA does not address real estate and personal property taxes; In public hearing Parx officials estimated annual tax payments to be roughly \$2.7 million based on a \$125 million assessed valuation.</p> <p>Responsible for all sales, meals, and excise taxes</p>	<p>Minimum investment of \$125 million</p> <p>No specific job numbers in HCA</p> <p>Commitment to hire locally and use union labor in construction</p>	<p>Reimburse town for infrastructure improvements directly related to construction and operation of establishment</p>	<p>Applicant committed to limited operations in RFA-2 Application but does not reference it in HCA</p> <p>Commitments to promote responsible gambling</p>

Appendix B. Surrounding Community Agreement Summary Matrix

LEOMINSTER - PPE	Designated in Phase 2 App	Agreement Reached	Status	Notes
	None	n/a	n/a	n/a
	Designated Post-Phase 2 App	Agreement Reached	Status	Notes
	Lunenburg	Oct-13	Surrounding Community Agreement	Includes annual \$5,000 impact fee; share of future revenues equal for all SCs, reimbursement of public safety costs, hiring and vendor preferences
	Westminster	11/24/13	Surrounding Community Agreement	Includes annual \$5,000 impact fee; share of future revenues equal for all SCs, reimbursement of public safety costs, hiring and vendor preferences
	Princeton	11/4/13	Surrounding Community Agreement	Includes annual \$5,000 impact fee; share of future revenues equal for all SCs, reimbursement of public safety costs, hiring and vendor preferences
	Lancaster	11/8/13	Surrounding Community Agreement	One time \$200,000 Community Benefit payment; Annual payment of \$35,000; share of future revenues equal for all SCs; reimbursement of public safety costs; hiring and vendor preferences
	Townsend	Oct-13	Surrounding Community Agreement	Includes annual \$5,000 impact fee; share of future revenues equal for all SCs, reimbursement of public safety costs, hiring and vendor preferences
	Petition MGC Post-Phase 2 App	Agreement Reached	MGC Action	Status
	Bolton	12/19/13	MGC approved petition; Bolton designated a SC and Agreement reached	Community Impact Fee of \$35,000; Commitment to study traffic impacts, exclude trucks and buses from town and direct visitor to alternate routes; other provisions of cost reimbursement and share of future revenues consistent with other SCAs
	Fitchburg	12/20/13	MGC denied petition; Fitchburg not designated a SC; Applicant still reached Agreement with town	Includes annual \$5,000 impact fee; share of future revenues equal for all SCs, reimbursement of public safety costs, hiring and vendor preferences
	Sterling	No	MGC denied petition; Sterling not designated a SC	None

LAINVILLE - SGR	Designated in Phase 2 App	Agreement Reached	Status	Notes
	Wrentham	11/5/13	Surrounding Community Agreement	Requires baseline studies w/ detailed scope prior to commencement of ops and 1 year after commencement; job fairs and other cross marketing efforts; community meetings as requested
	Mansfield	10/31/13	Surrounding Community Agreement	Requires studies 1 year after commencement, no baselines; job fairs and other cross marketing efforts; community meetings as requested
	North Attleboro	10/24/13	Surrounding Community Agreement	Requires baseline studies prior to commencement of ops and 1 year after commencement Includes commitments for local hiring, cross marketing, periodic community meetings, charitable support
	Attleboro	10/31/13	Public Safety Agreement	Applicant will reimburse for all tangible and verifiable incremental costs directly attributable to any incident and Plainridge

PI	Foxboro	12/30/13	Surrounding Community Agreement	Creates \$250k escrow account to reimburse town for human services and public safety expenses not covered by Community Mitigation Fund; Commits to review impacts on traffic and water
	Designated Post-Phase 2 App			Notes
	None	n/a	n/a	n/a
	Petition MGC Post-Phase 2 App	Agreement Reached	MGC Action	Status
	None	n/a	n/a	n/a

RAYNHAM - RP	Designated in Phase 2 App	Agreement Reached	Status	Notes
	Easton	Jan-14	Surrounding Community Agreement	Annual community impact fee of \$362,500 (rising @ 2.5%/year after year 4) to be compensatory for all impacts on Easton; provides for hiring and vendor fairs in Easton and commitment to fund any necessary design and construction of improvements at two intersections; purchase of police cruiser
	Taunton	11/12/13	Surrounding Community Agreement	Annual community impact fee of \$200,000 (rising @ 2.5%/year after year 4) to be compensatory for all impacts on Taunton; provides for hiring and vendor fairs in Taunton
	Designated Post-Phase 2 App	Agreement Reached	Status	Notes
	Berkley	11/18/13	Nearby Community Agreement	No impact fee; study to be commissioned 1 year after commencement of operations
	Lakeville	11/18/13	Nearby Community Agreement	No impact fee; study to be commissioned 1 year after commencement of operations
	Middleboro	12/16/13	Surrounding Community Agreement	Annual community impact fee of \$50,000 (rising @ 2.5%/year after year 4) to be compensatory for all impacts on Middleboro; provides for hiring and vendor fairs in Middleboro and commitment to advocate for improvements to Middleboro rotary
	Rehoboth	11/18/13	Nearby Community Agreement	No impact fee; study to be commissioned 1 year after commencement of operations
	Stoughton	11/4/13	Nearby Community Agreement	No impact fee; study to be commissioned 1 year after commencement of operations
	West Bridgewater	12/18/13	Surrounding Community Agreement	Annual community impact fee of \$250,000 (rising @ 2.5%/year after year 4) to be compensatory for all impacts on West Bridgewater; provides for hiring and vendor fairs in West Bridgewater
	Petition MGC Post-Phase 2 App	Agreement Reached	MGC Action	Status
	Bridgewater	1/13/14	MGC approved petition and designated Surrounding Community; Agreement reached	Annual community impact fee of \$150,000 (rising @ 2.5%/year after year 4) to be compensatory for all impacts on Bridgewater; provides for hiring and vendor fairs in Bridgewater; community retains right to petition state/MGC for other reimbursements
	Dighton	No	MGC denied petition	None