

To whom it may concern,

I am writing to ask that the BIA reject the Middleboro Mashpee land into trust application for the land located in Middleboro, Massachusetts.

Middleboro hired a lawyer experienced in Indian gaming law to write an IGA this IGA was rejected. The final IGA was largely written by people with no experience in this area of law/negotiation. The rejected IGA crafted by Dennis Whittlesey identified many impacts that were not codified in the final agreement. The final IGA provides revenues that are not sufficient to cover the costs of hosting an extremely large casino.

Police impacts

The Whittlesey agreement said:

Finally, the Town Police Department already has a serious need for a new central police station and that need likely will become critical with the increased demands imposed because of the presence of the Project within the Town. The current estimated cost for this station is \$6-8 million, and the Tribe will fund __ percent of such construction. However, it is also recognized that the Town Fire Department is required by law to provide fire protection and first responder emergency medical services at the Project Site.

I think we should assume that the casino will force us to build a new police station. This new building is estimated at \$6-8M **today**. By the time we get around to building it, and the extra demands of the casino are considered, I think Middleboro should plan on being **required** to spend \$8-\$12M in 5-10 years. This amount of money will be between one and two years worth of casino revenue. Given that the pittance we will be receiving each year will probably not even cover the annual expenses, this money will have to come from Middleboro residents directly.

Fire

Our legal obligation to be the first responder for Fire/EMS may **force** us to run an unprofitable ambulance service and carry 16 extra firefighter and EMS employees. I find it interesting that this obligation never made it into the final agreement though it was included in the accompanying cover letter.

It goes without saying that we will be required to re-open the North Middleboro fire station. This will automatically mean assuming the costs associated with manning it 24x7.

Schools

In addition, the experience of the communities adjacent to the large Connecticut casinos shows that there is a dramatic increase in the need for teachers with foreign language skills as determined by the specific national origins of various workers. In one such town, there now are 35 languages represented by students in the school system.

This increase represents a significant demographic shift that will incur costs both for the school and for the general government. At least the kids in the school will eventually become proficient in English, many of the parents probably never will. Even some local businesses may have difficulty when suddenly faced with a significant non-English speaking customer base.

The simple fact are costs that are incurred by a rapid demographic shift - and one that we should be

ready for. Between Foxwoods and Mohegan Sun, there are some [3000 Asian employees](#). It's reasonable to project similar numbers for the Mashpee Wampanoag casino and that a significant number will move to the region. They will need governmental and educational services. Schools, town government, and local businesses may need translation services to service these residents. It is only fair to them and us that we acknowledge this fact and prepare ourselves for the cost.

Housing

It is documented that employees at tribal casinos and hotels are often unable to secure housing within the immediate vicinity because affordable housing is simply not available to them. The Tribe acknowledges that this is a major problem for its Project development and will work with the Town to confront this issue on both short- and long-term bases.

Accordingly, the Town will examine the development of affordable housing, and if housing development is pursued then the Middleborough Housing Authority assisted by the Town's Office of Economic and Community Development will seek funding for such projects and commence housing construction once the Tribe secures the necessary governmental Project approvals at the state and federal levels. However, the Tribe agrees to work with the Town on these housing projects and will assist the Town in both securing funding or providing direct funding as necessary to allow the Town to meet the increased housing demands from the Project.

This tells me that the casino **will necessitate** that the town pursue affordable housing to accommodate the employees at the casino. This will put Middleboro in the unusual position of trying to develop affordable housing when most towns do their best to avoid it.

This will bring planning costs, school costs, DPW costs, and costs in virtually every department in town. The rejected Whittlesey agreement has a much more honest assessment of the impacts given the fact that it was limited by the woefully inadequate projections of most town departments. It also would have paid us 2 or 3 times what our agreement does.

Flotsam and Jetsam

The fejected agreement also include these stipulations **none of which were codified in the final IGA.**

- Tribe will fund the Town for customary health and safety inspections.
- Use of low emission vehicles for transporting workers and customers from off site parking locations using routes developed in conjunction with town planners to minimize in-town traffic impacts.
- **A special fund for negatively affected property taxes**
- Green buildings period - not where financially feasible
- No building higher than town water tower 345 feet
- Consideration for Thompson street, Picone farm as open space such as a golf course.
- Consideration for Muttok, Oliver Mill Park, and the Oliver and Washburn houses, The Robbins Museum of Archaeology, Tom Thumb Museum
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These snippets from the agreement are the difference between talk and action. The final agreement does not have **any** of these **requirements**. The closest thing is a statement that the Tribe will **try** to build green buildings **where economically feasible**.

What we have is an IGA produced by an expert in the field that included payments and recognition of negative effects on the town. None of these effects were codified in the final IGA which was based on an agreement crafted by Town Manager Jack Healey a man with absolutely no expertise in Indian law or contract negotiation.

Based on this lack of impact identification, it is a certainty that the Middleboro/Mashpee IGA will cause severe negative economic and social effects on the town of Middleboro. For that reason, it is imperative that the land into trust application is denied.

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