



## Legislative Affairs

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The Honorable Stanley C. Rosenberg  
State House, Room 320  
Boston, MA 02133

June 15, 2010

### **Re: Energy Efficiency, Smart Growth and Resort Style Casinos – Senate Draft Expanding Gaming Proposal**

Dear Senator Rosenberg:

Mass Audubon thanks you and the Massachusetts Senate for providing the opportunity to comment on draft expanded gaming legislation, which includes the licensing of resort style casinos. While Mass Audubon holds no official position on the moral, social and/or cultural implications of casino gambling in Massachusetts, we do have serious concerns over the potential environmental impacts of any proposed mega-development on the landscape of the Commonwealth, particularly in rural Massachusetts.

We define a mega-casino development as similar to the Las Vegas-style destination resort casino that was proposed in Middleborough by the Mashpee Wampanoag Tribe. Partnered with the Malaysian based Genting Group that bankrolled Foxwoods in Connecticut, they envisioned: 4,000 slot machines, and 180 game tables; a 1,500 room hotel; ten restaurants; an “entertainment venue” of 10,000 seats; a spa, golf course, and water park; an 80,000 square foot convention center, retail shops, and a warehouse; 10,000 parking spaces; and more. Although plans for any particular casino are not set, such a development could encompass hundreds of acres or possibly even thousands of acres of land.

Mass Audubon has advocated for provisions to ensure that any destination resort casinos built in the Commonwealth are held to the highest environmental and efficiency standards and that state funding be contingent upon meeting smart growth and LEED criteria. We support the provisions in the Senate draft bill that requires consideration during the license application process of sustainable development principles, LEED criteria, US Environmental Protection Agency efficiency standards for electrical equipment, and procurement of ten percent of annual energy consumption from renewable sources. We also suggest further requirements that any large casino meet sustainability and energy efficiency criteria in order to get a license, as resort style casinos are potentially some of the largest single developments in the Commonwealth.

Although not addressed at this time, Mass Audubon would like to highlight that if any casino is built on tribal reservation trust lands approved by the US Department of the Interior’s Bureau of Indian Affairs it would be exempt from virtually all federal, state, and local laws, including environmental laws unless required in a state/tribal compact. If a state/tribal compact is developed, we would urge the Governor and General Court to make certain that all aspects of environmental and land use protections are addressed in the compact.

Thank you again for providing the opportunity to voice support for inclusion of smart growth and energy efficiency criteria in the final version of Senate expanded gaming legislation.

Sincerely,

**Jennifer Ryan, Legislative Director**

*Mass Audubon works to protect the nature of Massachusetts for people and wildlife. Together with more than 100,000 members, we care for 32,000 acres of conservation land, provide educational programs for 200,000 children and adults annually, and advocate for sound environmental policies at local, state, and federal levels. Mass Audubon's mission and actions have expanded since our beginning in 1896 when our founders set out to stop the slaughter of birds for use on women's fashions. Today we are the largest conservation organization in New England. Our statewide network of 43 wildlife sanctuaries welcomes visitors of all ages and serves as the base for our conservation, education, and advocacy work. To support these important efforts, call 800-AUDUBON (283-8266) or visit [www.massaudubon.org](http://www.massaudubon.org).*